



# One JBT Guide to Ethical Conduct



# Table of Contents

## **Introduction to the One JBT Guide to Ethical Conduct**

One JBT Guide to Ethical Conduct

Message from the President and CEO

Our Expectations of You

- Professional Conduct in the Workplace
- The JBT Hotline
- Anonymity and Confidentiality
- Investigations
- No Retaliation

The Guide FAQs

## **Our Impact**

Diversity and Inclusion

Harassment and Discrimination

Human Rights

Health and Safety

Environment

## **Our Assets – Protecting Ours and Respecting Others**

Confidential Information

Protection of Assets

Insider Trading

Accurate Books and Records

- Special Responsibilities for Members of the Finance Team
- Records Retention

Fraud

Social Media

Legal Proceedings

## **Our Global Footprint – Integrity in Our Actions Around the World**

Improper Payments/Anti-Bribery

Antitrust and Fair Competition

Trade Compliance

- Anti-Boycott Laws

Political Contributions

Gifts, Favors, Gratuities and Vendor Relations

Conflicts of Interest

- Doing Business with and Supervising Family Members
- Outside Employment and Affiliations
- Jobs and Affiliations of Close Relatives

# Introduction

---

One JBT Guide to Ethical Conduct

Message from the President and CEO

Our Expectations of You

- Professional Conduct in the Workplace
- The JBT Hotline
- Anonymity and Confidentiality
- Investigations
- No Retaliation

The Guide FAQs







## One JBT Guide to Ethical Conduct

### Our Guide is Aligned with Our Values

#### **Integrity in Everything We Do** | **Accountability** | **Relentless Continuous Improvement** | **Teamwork**

Our core values express what we expect of each other and ourselves. They guide our behavior and serve as the foundation for our decision-making. In everything we do at JBT, we embrace and embody these values.

**Integrity in Everything We Do.** In all of our business dealings and in the communities in which we operate, we will conduct ourselves with honesty and fairness. This means doing the right thing, even if it means losing a business opportunity.

**Accountability.** We hold one another accountable for compliance with our rules and ethical business conduct and take ownership of our actions. We act ethically and respectfully at all times and raise questions or report concerns whenever we see something that does not feel right.

**Relentless Continuous Improvement.** We work tirelessly to improve our products, services and processes to ensure that we always win business by striving to meet the needs of our customers. We promote a culture that focuses on communication, innovation and improvements to best serve our customers.

**Teamwork.** We work together to achieve our goals, while fostering an environment that balances collaboration with individual contributions. We treat one another respectfully and support each other when difficult situations arise.

Each day we balance competing pressures at JBT and in our personal lives. Pressures to succeed. Pressures to be efficient. Pressures brought about by changing conditions or time constraints. We all balance a lot.

As you balance these competing pressures, you must remember that at JBT we conduct business according to our values. This includes how we respond to challenges and competing pressures in our day-to-day activities. At JBT, it is never appropriate or acceptable to act unethically while performing your job. Conducting JBT business with integrity is one of our core values – Integrity in Everything We Do.

Our values apply always and without exception. In line with one of our core values, we are all Accountable for any failure to conduct business for JBT with Integrity. Our Accountability extends to the JBT employees who work with us, to the outside vendors we use to support our business, and to all other third parties we engage with to carry out JBT business worldwide.

We have refreshed our One JBT Guide to Ethical Conduct to ensure we have a common understanding of what it takes to conduct JBT business with Integrity. The Guide is now available in 11 of the primary languages used locally by JBT employees worldwide. In this new version of our Guide, you will find our expectations for conduct that JBT employees and representatives must uphold when faced with specific issues. You will also find answers to some common questions that arise and resources for further guidance and reporting concerns.

The Guide is the foundation of our Ethics and Compliance trainings offered throughout the year. We encourage you to engage with our Ethics and Compliance team by completing the training programs when offered and to ask questions about anything you don't understand. This helps us with another fundamental core value at JBT – Relentless Continuous Improvement. As we continuously seek to meet the Ethics and Compliance obligations that impact our jobs, we must identify problems and inform management so that we can continue to improve our business.

Our Guide does not address every challenge that may arise. It contains principles to help you apply our values to everyday situations and is intended to serve as a reference tool for you to use while performing your job at JBT. At the heart of the Guide is the requirement to do the right thing, regardless of whether a specific situation is covered in the Guide. If you have the slightest doubt whether an action is appropriate you have the obligation to seek advice and to find out the answer. The Guide also identifies multiple resources, such as the JBT Hotline and our Speak Up Policy, that are available to you when you are in doubt.

JBT is a terrific company with a long history and a bright future. Conducting our business with ethics and in line with our values helps preserve JBT's reputation and our future opportunities.

Speaking for myself, and for all members of JBT's management team, we remain available to each of you to answer any questions or to address any concerns that you may have. Thank you for your dedication to the JBT values for all that you do.



**Brian A. Deck**

## Our Expectations of You

### What is Expected of Our Employees?

As JBT employees, we must always consider and respect our core values of Integrity in Everything We Do, Accountability, Relentless Continuous Improvement and Teamwork. In observance of these values, you are required to:

- Actively promote a culture of integrity.
- Conduct yourself according to the highest ethical and legal standards.
- Follow all policies, laws and regulations that apply to your job.
- Consider the appearance of your actions.
- Seek guidance whenever you have questions about our Guide, policy or law.
- Be accountable for your actions.
- Report any known or suspected violations of our Guide, policy or law.
- Continue to develop and refine your understanding of our Guide and the policies and laws that impact your job.
- Lead by example and demonstrate integrity in everything you do for JBT.

When you face an ethical dilemma, exercise reasonable judgment and ask yourself the following questions:

- Could it harm JBT's reputation?
- Is it illegal?
- Will it harm the environment or create a safety risk?
- Is it consistent with our Guide?
- Would I want to read about it in the news?
- Does it just feel wrong?

### What is Additionally Expected of Our Managers?

If you need further advice, seek guidance from your manager.

As a manager and leader at JBT, you have a responsibility to promote and demonstrate high ethical standards and JBT's core values. We each have an obligation to lead by example and provide direction for ensuring a culture centered on our value of Integrity. As a manager, always remember to:

- Do the right thing in business activities and model this behavior to others.
- Guard your words and actions – as a leader, your behavior will set the tone for the workplace culture that your employees will emulate.
- Be consistent – your actions could send “hidden messages” that may be interpreted as a way to “bend the rules.”
- Take action when violations of our standards are discovered.
- Never leave the impression that it is okay to compromise ethical standards to accomplish business goals.
- Promote a culture where employees feel comfortable asking questions and raising concerns.
- Never retaliate or tolerate retaliation against employees who ask questions or raise concerns in good faith.

**No one has the authority to make another JBT employee, or anyone working on JBT's behalf, violate our Guide, JBT policy or the law. Any attempt to direct or otherwise influence anyone to commit a violation is itself a violation of our Guide.**



## Professional Conduct in the Workplace

When in a JBT workplace, a customer site, a vendor site, a JBT-sponsored function or while traveling for JBT business, or at any other place you are representing the Company, all employees, and anyone working on JBT's behalf, are expected to act in a mature and professional manner at all times. Employees must maintain appropriate standards of conduct in order to protect each other's health and safety, to demonstrate respect to others, to maintain the quality of our goods and services, and to protect the property and goodwill of JBT.

The following list provides examples of unacceptable behaviors. This list is not intended to be complete, and JBT employees are expected to use their best judgement at all times.

- Fighting, hitting or threatening another individual or engaging in any other violence or intimidation.
- Any use of alcohol which impairs judgement and reflects negatively on JBT; this includes the use of alcohol at dinners, sporting events, or other off-site and Company-related meetings and events.
- Theft, deliberate destruction or unauthorized use of property belonging to JBT, a co-worker, a customer or others.
- Using abusive or obscene language or gestures.

Employees should direct questions or concerns about appropriate workplace conduct to their manager, Human Resources or the JBT Hotline.

## Our Ask of You

- Consider your surroundings. Even when you are not in the office or on Company property, you are still representing the Company when you are at client or vendor locations, conferences, meetings, professional organization events, dinners, sporting events, or other off-site and Company-related events.
- Maintain a professional demeanor. When you are representing the Company you should act appropriately and professionally. This means respecting others, including respecting differing opinions or beliefs, refraining from overuse or misuse of alcohol, and refraining from obscene language or gestures.
- Think first. Do not communicate a joke or comment or take any action which might be viewed as threatening, offensive, derogatory, disrespectful or insulting. What may seem funny or harmless to some people may be hurtful or degrading to others.
- Ensure your guests at any JBT-related functions understand the expectation to behave appropriately. JBT employees are responsible for the conduct of their guests.

## FAQ

**Q: While attending a JBT hosted group dinner with a customer's employees, I noticed that one of my colleagues was clearly drunk. At the end of the night, he offered to drive one of our customer's employees home. In that circumstance, what should I do?**

**A:** It would be best to try to prevent someone you know from driving under the influence of alcohol. In a Company-sponsored event where a customer may also be at risk, it is incumbent on JBT employees to take affirmative steps to address that risk. If you are not comfortable addressing the situation directly, asking the employee's supervisor, or the most senior company representative present at the event, to intervene will likely be most effective.



### To Learn More

- [Speak Up Policy](#)
- [Harassment and Discrimination Policy](#)
- [Workplace Violence Prevention Policy](#)



## Our Expectations of You

### The JBT Hotline

**JBT has established a hotline that may be used to report concerns about ethics, safety and other compliance issues if you are unable to use or are uncomfortable using other means of raising concerns, or where raising concerns has not resulted in appropriate action.** The JBT Hotline is available 24 hours a day, 7 days a week and may be accessed by telephone or the Internet. Multiple local dialing and language options are available, and anyone using the JBT Hotline may choose to remain anonymous, as permitted by local law.

The JBT Hotline is administered by an independent third-party who receives questions and concerns and promptly directs them to appropriate resources within JBT for follow-up. All questions and concerns are handled professionally and in a confidential manner. Your cooperation, honesty and truthfulness are critical to our process.

### When to Speak Up

Contact the JBT Hotline if you:

- Need advice or have a question.
- Wish to raise an issue or concern.
- Are not sure where to go for information.
- Raised an issue or concern and were not satisfied with how it was handled.
- Are uncomfortable using one of the other resources identified in our policies.

### Anonymity and Confidentiality

**When you make a report to the JBT Hotline, you may choose to remain anonymous, as permitted by local law.** If you choose to make your identity known, JBT will take every reasonable precaution to limit disclosure of your identity, consistent with conducting a thorough and fair investigation. To help maintain confidentiality you should avoid discussing the concern and your report with anyone who is not involved in the investigation.

### Investigations

**JBT takes all reports of possible misconduct seriously.** All matters will be investigated and JBT will make a determination whether the Guide, another Company policy or the law has been violated and take the appropriate action. You may be asked to participate in an audit or internal investigation. If this happens, you are always required to cooperate fully and communicate honestly.

You may also receive a request for documents or a request to meet with regulators or lawyers in connection with a legal proceeding or government investigation. If you receive such a request, and you do not know that a Company attorney is involved, you should immediately contact a Company attorney for assistance.





## Our Expectations of You

### The JBT Hotline:

**1-800-461-9330** Toll-free, confidential, anonymous, available 24/7

### On the Internet at:

[www.jbthotline.com](http://www.jbthotline.com)

### International Callers:

To speak with a local language operator, go to [www.jbthotline.com](http://www.jbthotline.com) on the Internet and select your country to obtain a list of local access numbers.

### Works Council:

Some jurisdictions are subject to a Works Council. For more information contact your HR representative.

## No Retaliation

**JBT will not tolerate retaliation against any employee who reports in good faith a potential violation of our Guide or the law.**

However, if a report is made in “bad faith,” the person making the report may be subject to disciplinary action. A report may be made in bad faith when it is false or misleading or made in a deliberate effort to get someone in trouble with a false report.



### To Learn More

- [Speak Up/Hotline Policy](#)
- [EU Whistleblower Policy](#)

## Why do we have a Guide?

The One JBT Guide to Ethical Conduct is the foundation of our commitment to conducting business with the highest levels of integrity. Our Guide is intended to serve as a resource for all employees in understanding the standards of behavior we are all expected to follow while conducting JBT business. It provides guidance to help us identify and to resolve ethical dilemmas and provides resources we should use when we have questions or concerns.

The Guide is not intended to serve as a contract, express or implied, nor does the Guide serve as an employment contract or alter the relationship between the Company and its employees.

## Who must follow our Guide?

Our Guide applies to all employees, officers and directors. We also expect everyone representing and working on JBT's behalf, including temporary employees, vendors, consultants, suppliers, agents, distributors and business partners, to understand and follow our Guide and to act in a manner that reflects our high ethical standards.

## Does our Guide explain all the standards I need to know?

Our Guide tries to capture many of the situations that individuals will encounter, and it offers guidelines to be applied in good faith using reasonable judgment. However, our Guide cannot possibly cover every situation that will confront us. JBT also has policies and procedures, such as the JBT Financial Standards, our Ethics and Compliance Policies and our internal controls, that go well beyond the standards that are reinforced in our Guide. In some cases, these policies and procedures may be more specific than the standards in the Guide, and you should follow those more specific policies and procedures. Ultimately, however, you are expected to adhere to both the letter and the spirit of the Guide, informed by your own common sense, good judgment and conscience. JBT promotes an environment that fosters open communication and encourages employees to ask questions, seek advice and raise all concerns. If you are ever in doubt about what you are doing or being asked to do, or if you become aware of an actual or potential violation of the Guide or the law, you should ask for help.

## What do I do when local laws vary?

As a global organization, JBT is governed by the laws and regulations of the countries where we operate. As a U.S.-based company with significant international operations, our employees around the world are also often subject to U.S. laws, regardless of where they operate. JBT employees and anyone who is working on JBT's behalf must abide by the laws that govern our business, and in some instances, there may be a conflict between the applicable laws of two or more countries. When you encounter such a conflict, it is critically important that you consult with a Company attorney to understand how to resolve the conflict properly.

## What are the consequences for violating our Guide?

Violations of our Guide may carry serious consequences, including disciplinary action, up to and including termination, and possible civil or criminal liability.

## FAQ

**Q: I observed conduct that seemed to violate our Guide. I feel I should report it, but I am nervous about what might happen if I do so. If I do make a report, what will the Company do to protect me from retaliation?**

**A:** If you report misconduct or raise a concern in good faith, JBT will investigate and protect you from any retaliatory actions. When an employee experiences retaliation – or conduct that appears to be retaliatory – this should be brought to the attention of Human Resources or reported to the JBT Hotline. Retaliation after making a report is serious misconduct and will not be tolerated at JBT.



### To Learn More

• [Speak Up/Hotline Policy](#)

# Our Impact

---

Diversity and Inclusion

Harassment and Discrimination

Human Rights

Health and Safety

Environment







## Diversity and Inclusion

At JBT, we strive to attract, develop and retain individuals who are as diverse as the customers and markets we serve. By embracing diversity of thought, culture and background, we create an inclusive work environment that fosters creativity and innovation.

### Equal Opportunity/Affirmative Action

JBT is committed to compliance with all equal opportunity requirements. Eligibility for employment or advancement is based solely on the relevant qualities of the candidate. Equal opportunity extends to all aspects of the employment relationship, including but not limited to hiring, promotions, training and development, working conditions, compensation and benefits. All employment decisions are made based on the individual's qualifications, without regard to race, color, religion, national origin, sex, age, disability, marital status, gender identity or sexual orientation.

### Fair Employment

JBT is committed to fostering workplaces that are safe and professional and that promote teamwork, diversity and trust. This includes the strongest commitment to providing equal employment opportunities for all persons.

### Respect for One Another

We have a duty to uphold JBT's high ethical standards by always treating each other with respect and by respecting each other's differences. JBT fosters a work environment in which we all should feel welcomed and valued. This gives our Company a competitive advantage and sets the foundation for JBT's role as a community and industry leader. We expect all JBT employees to treat each other with dignity and respect at all times. We encourage and value a culture of mutual respect, trust and open communication whereby all employees have an opportunity to be successful.

### FAQs

**Q. Does diversity and inclusion look the same for every country and every employee?**

**A.** No. Local laws, practices and customs may cause practices to vary slightly across JBT. JBT expects that the underlying commitment of creating a diverse, inclusive and safe workplace will remain constant across the Company.

**Q. I believe I was denied an opportunity based on a protected status, such as my race, color, religion, national origin, sex, age, disability, marital status, gender identity or sexual orientation. What should I do?**

**A.** Immediately contact Human Resources to report your concern. If you do not feel comfortable reporting the concern in person, you may make a complaint to the JBT Hotline.

### Our Ask of You

- Treat each other with dignity and respect at all times.
- If you witness a co-worker being treated unfairly, or if you have a concern, Speak Up immediately.
- Create and encourage a culture of mutual respect in everything you do.



### To Learn More

- [Harassment and Discrimination Policy](#)
- [Speak Up Policy](#)
- [Equal Employment Opportunity Policy](#)

We must ensure that our workplace is free from harassment. While the definitions of harassment and sexual harassment may vary from one country to another, at JBT harassment includes any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive or hostile work environment. It can take many forms, including physical actions, spoken and written remarks, symbols, and videos or pictures. Regardless of the form it takes, harassment negatively affects individual work performance and our workplace as a whole, and it will not be tolerated.

All employees are entitled to work in an environment free from discrimination. JBT will not tolerate any form of discrimination in connection with any term or condition of the employment relationship, including hiring, promotion and discipline, based on, but not limited to:

- Race or color
- Religion
- Sex
- Age
- Gender
- Disability
- Sexual orientation
- National origin or ethnicity
- Marital and family status
- Veteran status
- Any other characteristic protected by applicable law or regulation

We must always give qualified individuals a fair chance to succeed at JBT based solely on their qualifications, conduct and abilities.

## Definitions

**Discrimination:** The unjust or prejudicial treatment of different categories of people as it relates to various protected status classifications as defined below. Discriminatory conduct can include taking actions based on a person's protected status, such as not promoting someone due to their gender identity.

**Harassment:** Any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive or hostile work environment. It can take many forms, including physical actions, spoken and written remarks, symbols, and videos or pictures. Regardless of the form it takes, harassment negatively affects individual work performance and our workplace, and it will not be tolerated.

**Protected Status:** Protected status includes race or color; religion; sex; age; gender; disability; sexual orientation; national origin or ethnicity; marital and family status; veteran status; or any other characteristic protected by applicable law or regulation.\*

\*Protected Status in the One JBT Guide is defined by U.S. federal law. International jurisdictions may have alternative definitions.

## FAQ

**Q: My co-worker makes explicit statements about another employee's appearance. I find the statements offensive but don't know if I should approach my co-worker with my concern. What should I do?**

**A:** At JBT, everyone is responsible for maintaining an environment free from harassing or offensive conduct. If you feel comfortable doing it, you could speak with your co-worker about their conduct. If you are not comfortable with that approach, you can speak with your manager, Human Resources or report the conduct to the JBT Hotline.

## Our Ask of You

- If you experience harassment or discrimination Speak Up.
- If you witness another employee being harassed or discriminated against, you must report the behavior immediately to your manager, Human Resources or other senior JBT leadership.



### To Learn More

- [Harassment and Discrimination Policy](#)
- [Equal Employment Opportunity Policy](#)



## Human Rights

We are committed to respecting and supporting human rights, in our workplace, in our relationships with business partners and in our communities. We will not tolerate abuse of human rights in our operations.

At JBT we value an environment that is free from workplace aggression. With respect to our business partners, we communicate our policies and expectations to our suppliers and pursue partnerships with those who share our commitment to respecting human rights.

Human rights risks are not limited to certain countries or types of engagements. Each of us is responsible for escalating concern if we suspect or become aware of potential violations of human rights.

### Our Ask of You

- **Understand and follow the law and JBT policies.**
- Comply with all applicable laws pertaining to fair employment practices, as well as laws prohibiting forced and compulsory labor, child labor, employment discrimination and human trafficking.
- **Report possible violations.**
- If you witness a co-worker being treated inappropriately, or if you have a concern about a human rights violation, you should Speak Up immediately.
- Report any suspicions or evidence of human rights abuses immediately to your manager, Human Resources or the JBT Hotline.
- Promote diversity and inclusion and do your part to protect the rights and dignity of everyone with whom JBT does business.



### To Learn More

- [Human Rights Policy](#)

### FAQ

**Q: When I was visiting a new supplier, I noticed employees working there who seemed to be underage. When I asked about it, I did not get a clear answer. What are my next steps?**

**A:** The first step is to be on the lookout for human rights abuses and to raise any issues with the supplier. The next step is to report the incident to your manager and a Company lawyer so that they can follow up. JBT is committed to human rights and to the elimination of human rights abuses, including the use of child labor.



At JBT, we conduct our business with care for the health and safety of our employees, contractors and customers, as well as the people in the communities where we work. We implement our Health, Safety and Environment policies through corporate standards/management systems and appropriate business and site policies. Maintaining that commitment demands that all of us at JBT understand and comply with all safety and health laws and regulations applicable to our jobs.

We put safety first with the goal of preventing all injuries, occupational illnesses and environmental incidents in our workplaces. Our commitment to safe practices extends throughout our business – from suppliers to end-users. We are committed to providing our customers with products and services that are safe and reliable.

Safety is everyone's responsibility at JBT. We all are accountable for providing a safe working environment, which means that you should immediately report any unsafe conditions or activities to a Health, Safety and Environment representative, your manager or Human Resources. This includes violations of safety laws, local Health, Safety and Environment rules or security procedures; threats or acts of violence against Company employees, customers or property; vandalism; and the presence of weapons or prohibited substances on Company premises. It also includes reporting an unsafe condition you observe at a customer's facility where you are working.

## Our Ask of You

- Follow all applicable health and safety laws, regulations and Company guidelines for the location where you work.
- You are expected to halt work and immediately report Health, Safety and Environment concerns, especially if you:
  - Are asked to perform a task you consider unsafe.
  - Are asked to perform a job you think you are not properly trained to perform and that may harm you or others.
  - See someone performing a task that you think is unsafe or that the person is not properly trained to do.
  - Suspect that a piece of equipment or process is not operating properly and may be unsafe.
  - Observe or are made aware of an unsafe condition or a potential danger to yourself or others.

## FAQ

- Q. I have recently been promoted to a new position and my manager has asked me to start immediately. I am hesitant because I have not received the required training on the equipment I will be using. I have seen others use it and I am confident that I will be able to use it properly. Can I begin my new role and use the equipment with supervision until I receive the proper training?**
- A.** No, as a part of JBT's commitment to safety, no one should perform work with any equipment that they have not been properly trained to use. You should speak to your manager or an HSE representative and you should refuse to take over these new duties until you have been trained. If you are uncomfortable with this approach, you can contact the JBT Hotline.



### To Learn More

- [Health, Safety & Environment Policy](#)



## Environment

JBT operates in compliance with all relevant environmental laws and strives to use environmental best practices in all we do. We value our people and consider it important to contribute toward a safe and healthy global environment.

Sustainability is part of who we are and what we do every single day. We recognize progress involves a balance of environmental stewardship, social responsibility and economic growth. We provide work environments, products, services and solutions that make productive and efficient use of resources as we strive to achieve our vision. We believe this commitment supports the enduring success of our customers, stockholders and employees.

### Our Ask of You

- If you become aware of any violation of environmental law or any action that may appear to conceal such a violation, immediately report the matter to your manager or to the legal team.
- Maintain JBT standards and ensure reports are accurate and complete. This is especially important if you are involved with processes that affect the environment.



### To Learn More

- [Environmental Management Guide](#)

# Our Assets – Protecting Ours and Respecting Others

---

Confidential Information

Protection of Assets

Insider Trading

Accurate Books and Records

- Special Responsibilities for Members of the Finance Team
- Records Retention

Fraud

Social Media

Legal Proceedings





## Confidential Information

Information is one of JBT's most valuable resources. We all have a responsibility to protect information that is of a confidential or proprietary nature. Confidential information can include marketing plans, product specifications, customer lists, customer and supplier information, pricing guides, product enhancements and financial information. This applies both during and after employment. Likewise, we respect other companies' confidential information. Employees, JBT vendors and representatives who have confidential information entrusted to them by the Company's business partners and suppliers must not disclose that information outside of JBT or their companies and must restrict its use within JBT or their companies only to those individuals with a need to know.

### Definition

**Information:** Proprietary and confidential information including trade secrets, know-how and data not generally known in the relevant trade or industry, relating to JBT's products, processes, services and business practices and plans, including but not limited to research, development, inventions, formulae, manufacture, purchasing, accounting, engineering, marketing, strategic plans, merchandising, selling, pricing and information received from third parties under an obligation of confidentiality. Information also includes government classified information, which must be controlled according to federal regulations or other contractual agreements.

### Our Ask of You

- Only share confidential information on a need-to-know basis.
- Be careful when creating and storing confidential information to preserve its confidentiality.
- Use good judgment when discussing confidential information. You should never discuss confidential information when unauthorized persons might be able to overhear what is being said. For example, never have conversations discussing confidential information in public spaces or when using mobile phones in non-private spaces.
- Immediately report any theft, loss or unauthorized disclosure of confidential information to your manager.
- Speak Up if you notice any situation that you believe places the security of confidential JBT information at risk.

### FAQ

- Q: I frequently work with confidential information. May I share it with anyone who works at JBT?**
- A:** No. You may share confidential information with other JBT employees only to the extent they need access to that information to do their jobs. This requirement is especially important with our most sensitive types of confidential information.



### To Learn More

• [Protection of Information Policy](#)



## Protection of Assets

### Use of Time, Equipment and Other Assets

To be successful, every employee must make the best use of their time and the time of co-workers. All JBT employees are expected to fulfill their job responsibilities and devote the necessary time to their work. Those required to report the hours they work must do so truthfully and accurately. Telephone, e-mail and voicemail systems provided to employees should only be used when authorized by JBT, to the extent authorized by JBT, and to further JBT's business interests consistent with federal, state and local law and the highest standards of ethics. Personal communication using these systems should be kept to a minimum. All employees must use their best judgment to ensure Company assets are not misused or wasted. Company assets are intended to help employees achieve legitimate business goals. Careless, inefficient or illegal use of Company property hurts us all. JBT employees should be alert to any situations or incidents that could lead to the loss, misuse or theft of Company property and resources.

### E-mail, Internet and Computer Systems

All JBT employees should use computer and network systems appropriately at all times. Employees must take care to compose all e-mails, text messages and other electronic communications in the same professional manner as other written correspondence. Employees owe a duty to JBT, its customers and its associates to use these systems in a manner that will merit their continued faith and confidence in JBT.

While limited personal use of our computer and network systems is allowed, it must not detract from Company work. Employees may never use their computers, Company-issued mobile phones or network systems for improper purposes, such as:

- Communicating patently offensive or inappropriate messages containing profanity, pornography or other sexual material, racial slurs or comments that offensively address a person's age, sexual orientation, religious or political beliefs, national origin, military status or disability.
- Accessing or viewing sexually explicit or otherwise offensive material.

### No Expectation of Privacy

When using Company-provided technologies, such as computers, cell phones and voicemail, JBT employees and other authorized users should not expect information sent, stored or received to be private. JBT reserves the right to monitor and review employee and other user activities to make sure these resources are used appropriately. The Company also reserves the right to block access to inappropriate Internet websites and prevent the transmission of patently offensive or inappropriate e-mails or files that contain profanity, pornography or other sexual material, racial slurs or comments that offensively address a person's age, sexual orientation, religious or political beliefs, national origin, military status or disability.



## Protection of Assets

### Definition

**Asset:** A generic term which includes, but is not limited to, property and any information which the Company owns or has the right to use (e.g., hardware, VoIP, PC applications, engineering systems, networks, etc.).



### To Learn More

- [Losses of Company Assets – Reporting Procedure](#)
- [IT Security Policy](#)

### Our Ask of You

- Protect JBT assets from loss by theft, carelessness, misuse or waste.
- Do not leave JBT assets unattended, in plain view. All employees should use reasonable security measures to protect JBT assets.
- Report suspected incidents of theft or misuse of JBT assets to your manager or the JBT Hotline.
- Report all information security events to the JBT Help Desk.
- Protect informational assets by understanding and complying with JBT's policies on confidentiality.

### FAQs

**Q: What do I do if my Company phone or computer is lost or stolen?**

**A:** Immediately inform your manager by opening a ticket with the JBT Help Desk.

**Q: I have seen my co-worker using Company assets for their own personal or financial gain. What should I do?**

**A:** You must immediately inform your manager, Human Resources or the JBT Hotline about your concerns.



## Insider Trading

We must avoid insider trading, meaning we must not trade JBT's securities while in possession of material, nonpublic information about our Company. The same prohibition applies to trading the securities of another company with which JBT does business, such as one of our suppliers or business partners, when you have material, nonpublic information about that company.

**Tipping is also a violation of our Guide.** Do not disclose material, nonpublic information about JBT or another company to anyone outside JBT, including your family members or friends.

Insider trading and tipping are not only violations of our Guide, but also serious violations of U.S. securities laws and may expose any individuals involved to disciplinary actions, including termination, as well as potential civil and criminal prosecution. For more information, refer to JBT's Insider Trading Policy or contact a Company attorney.

### Definitions

**Inside Information:** Any non-publicly available information that would reasonably be expected to affect the price of the security or that would influence an investor's decision. Examples include:

- Financial statements or forecasts.
- Possible mergers, acquisitions or dispositions.
- Knowledge of forthcoming product developments.
- Changes in senior management.

**Material:** Information is "material" if a reasonable investor would consider the information important when deciding to buy, sell or hold that company's securities.

**Nonpublic Information:** Information is "nonpublic" until it has been disclosed and adequate time has passed for the securities markets to digest the information. Some examples of material, nonpublic information include:

- Advance notice of changes in senior management.
- Unannounced mergers or acquisitions.
- Significant pending or threatened litigation.
- Nonpublic financial results.
- Development of a significant new product.
- An unannounced stock split.

**Tipping:** Tipping arises when you disclose material, nonpublic information about a company to someone else, and that person trades a security of that company while they possess the information you provided.



## Insider Trading

### Our Ask of You

- All JBT employees are expected to understand and follow the law and JBT policies related to securities and confidential information.
- As a JBT employee you must never “tip” others by disclosing material, nonpublic information about the Company to someone else, including your family or friends.
- JBT employees, including their immediate family members, must never buy or sell stocks based on “inside information.”
- Use caution when discussing the Company in public, even if only speaking with other JBT employees. If others without access to the inside information could be within hearing distance, then inside information could leak and lead to tipping and insider trading.



To Learn More

• [Insider Trading Policy](#)

### FAQs

**Q: Who should I contact if I have questions or concerns about trading and securities?**

**A:** If you have questions about buying or selling securities, you may ask the Company’s investor relations team or a Company lawyer.

**Q: How do I report suspicions of insider trading?**

**A:** If you suspect that a coworker or third party acting on behalf of a JBT employee has committed, is committing or will commit insider trading, you should immediately report it to a Company lawyer or the JBT Hotline.

**Q: What are the consequences for insider trading?**

**A:** Insider trading is a serious offense and can include financial and criminal liability. You will also be subject to disciplinary action up to, and including, termination of your employment with JBT.

Our stockholders rely on us to maintain accurate and honest books and records. These documents form the basis for all of our public disclosure and governmental filings, and they allow us to give our stockholders and the public an accurate view of our Company's operations and financial standing. We also use these documents to analyze Company operations and make important business decisions.

As a result, we must each make sure that the information we submit in all Company records is complete, accurate and understandable. This includes, for example, all of the information we provide in payroll documents, timecards, travel and expense reports, performance records, sales information, customer and supplier information, and technical or design records.

JBT's books and records must accurately and fairly reflect its transactions and disposition of assets. JBT has established and maintains a comprehensive system of internal controls designed to ensure that:

- Transactions are conducted in accordance with management's authorization.
- Transactions are properly accounted for and accurately and promptly recorded.
- Assets and records of the Company are adequately safeguarded.

We must never make a false or artificial entry in Company records. None of us should ever establish any unrecorded Company funds or assets or any other type of "off-the-books" accounts. Any suspected accounting or auditing irregularities should be reported immediately to the Company's Controller, Chief Financial Officer, Audit Committee Chairperson or to the JBT Hotline. **No one will be retaliated against for making a good faith report of such matters.**

## FAQ

**Q: What do I do if I see a co-worker inaccurately reporting their time or expenses?**

**A:** If you feel comfortable doing so, you should immediately speak to your co-worker and remind them of JBT's policy on truthfully and accurately reporting time and expenses. If you are not comfortable speaking with your co-worker, you should immediately report the concern to your manager, the financial department or the JBT Hotline.

## Special Responsibilities for Members of the Finance Team

Employees on our finance team must ensure that the information we disclose in our public communications and periodic reports filed with the Securities and Exchange Commission is complete, accurate, fairly stated and made in a timely and understandable manner. In addition, employees on our finance team are required to:

- Help maintain reliable internal controls.
- Inform the Chief Financial Officer or VP of Internal Audit of, or report to the JBT Hotline, any transactions, events or circumstances that could have a material impact on the completion or accuracy of our Company's financial statements.
- Fairly and completely represent material facts or circumstances when interacting with those individuals who prepare our Company's financial statements and with our auditors.
- Ensure that those who perform accounting or financial reporting functions know and adhere to these principles and all applicable financial policies, legal and regulatory standards.

## Records Retention

At JBT, we generate a large volume of paper and electronic records each day. The business records that we work with must be maintained, retained and destroyed in accordance with all legal and regulatory record-keeping requirements and JBT's Information Management (Record Retention) Policy. Consult a Company attorney if you have specific questions about the retention period of a document, or if you have questions concerning the documents referred to in a legal hold notification. Destruction of documents subject to a legal hold notice, even inadvertently, could expose our Company, and you, to significant risks and could significantly compromise the Company's ability to defend itself in litigation.





## Accurate Books and Records

### Our Ask of You

- All JBT employees are expected to accurately report their time and employment-related expenses in a timely manner. If a JBT employee suspects fraudulent reporting, they must immediately report it to the finance department, their manager or the JBT Hotline.
- Comply with JBT's information management policies for all documents, files, electronic records and e-mails.
- Follow the retention periods specified in the Information Management (Records Retention) Policy.
- Follow the instructions in a "legal hold" record retention notification from a JBT attorney.



### To Learn More

- [Information Management \(Records Retention\) Policy](#)



## Fraud

No one at JBT should ever compromise our values of honesty and integrity by committing fraud. Fraud occurs when information is intentionally concealed, altered, falsified or omitted for individual benefit or the benefit of others. Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline). Even the appearance of fraud should be avoided.

Examples of fraud include:

- Falsifying expense reports.
- Altering manufacturing numbers to meet productivity goals.
- Presenting false medical information to obtain disability benefits.
- Falsely reporting time worked to earn more pay or to avoid discipline for being late or absent from work.
- Manipulation of bidding on public contracts, even at the request of a customer.
- Misrepresenting sales of products to obtain unauthorized pricing for a customer.
- Misstating financial information in our Company's books and records.
- Misrepresenting performance or safety data.
- Impersonating another person or misrepresenting your authority.

### Our Ask of You

- Employees are expected to act in an ethical manner when performing work for JBT.
- All JBT employees are required to immediately report fraud which they have become aware of or have a reasonable basis for believing.

### Definition

**Fraud:** Any willful or deliberate act committed with the intention of obtaining an unauthorized benefit, such as money or property, by misrepresentation, deception or other unethical means.

### FAQ

**Q: I have been asked by a colleague to approve an invoice for services that were not performed. What should I do?**

**A:** If you approve this false invoice, you are participating in fraud and false reporting. If a payment is made based on your approval, you are part of an event that may be considered theft. You should immediately report the request to your manager, Human Resources or the JBT Hotline.



### To Learn More

- [Anticorruption Policy](#)
- [Speak Up Policy](#)



## Social Media

JBT recognizes that social media is an integral part of the way our employees communicate with friends, family and colleagues. Social media can also be a useful means of marketing and thought leadership. All JBT employees must apply thoughtful rationale to their social media posts by following the JBT Social Media Policy.

Although personal information may be shared on social media, please use caution against:

- Disclosing JBT's intellectual property, including trade secrets and confidential and proprietary information.
- Misappropriating JBT's trademarks or trade names.
- Violating JBT policy by engaging in proscribed harassment, discriminatory or retaliatory behavior.

Anyone who identifies themselves as a JBT employee on personal social media accounts or posts must remember that any statements they make on social media may reflect on the JBT brand. Failure to adhere to JBT values, policies and legal requirements may lead to disciplinary action.

Remember, posts on social media and networking sites are permanent, transferable records that can impact our Company's reputation. Before posting an electronic message, always ask yourself if you would want the general public to read the message—because someday they may. For more information, please refer to our Social Media Policy.

Liking, sharing and re-posting JBT approved content is encouraged.

### FAQs

#### **Q: Can I post photos of our office get-together on social media?**

**A:** Yes, however it is important to ensure that the photo is up to the standards of all JBT policies. Please review the photo closely to ensure there is no confidential information displayed, and obtain the consent of people who appear in the photo.

#### **Q: May I identify myself as a JBT employee on my personal, non-professional social media accounts?**

**A:** Yes, however you must post a disclaimer stating that all views and opinions are your own. You are responsible for all of the information posted on your personal social media accounts and may face disciplinary actions if your actions negatively impact the Company.

### Our Ask of You

- Do not communicate on behalf of JBT unless you have been expressly authorized to do so by JBT's corporate communications or legal team.
- If you are contacted by the media, immediately forward the request or alert the Company's investor relations team or a Company attorney.
- Never post content or a photo containing confidential information without Company approval.



### To Learn More

- [Social Media Policy](#)
- [Social Media Policy for Select German Entities](#)



## Legal Proceedings

**Only make commitments you are authorized to make.** The Company has guidelines which outline the authority of colleagues to make commitments (e.g., entering into contracts) on JBT's behalf. If you are unsure who can make commitments on behalf of JBT, contact the legal team.

### Subpoenas and Government Inquiries

From time-to-time, JBT may receive requests for information from government agencies or in connection with legal matters. All such requests must be forwarded to the attention of a Company attorney immediately. You should not respond to a request for information from a subpoena or government official without prior approval from the legal team.

### Lawsuits and Claims

The legal team is responsible for managing JBT's litigation and claims and for providing or contracting for legal services to JBT. The legal team is solely responsible for hiring outside lawyers as needed. It is the responsibility of all JBT employees to maintain accurate and complete records and to supply them promptly and completely to Company attorneys when required for litigation. Normal record retention policies may be suspended by a Company attorney due to a litigation matter. Documents (including electronic data) relating to pending legal matters must be retained and cannot be destroyed without the approval of the legal team even if routine records management policies might otherwise permit.

### Our Ask of You

- Contact a Company attorney if you receive a request for information from a government official, administrative agency, court or a non-government or private party such as subpoenas requesting documents or testimony, letters or calls from attorneys or any other non-routine request for information.
- Contact a Company attorney if you are notified of any lawsuit, arbitration or other adversarial proceeding involving JBT.
- Report any claims or incidents, including significant property damage or injuries, which might give rise to a claim to a Company attorney.
- Never alter, falsify or conceal records or documents relevant to legal matters including litigation, arbitration, any adversarial proceeding or investigation.

### FAQ

**Q: I received a call from someone identifying themselves as a government official and demanding I send over documentation for one of our clients immediately. What should I do?**

**A:** Take the name, contact information and information regarding the request and immediately inform a Company attorney. Do not provide any additional information unless authorized to do so by the legal team.

# Our Global Footprint – Integrity in Our Actions Around the World

---

Improper Payments/Anti-Bribery

Antitrust and Fair Competition

Trade Compliance

- Anti-Boycott Laws

Political Contributions

Gifts, Favors, Gratuities and Vendor Relations

Conflicts of Interest

- Doing Business with and Supervising Family Members
- Outside Employment and Affiliations
- Jobs and Affiliations of Close Relatives







## Improper Payments/Anti-Bribery

No matter where in the world we operate, there is an anti-bribery law or policy that applies to our business. Most countries have anti-bribery laws that prohibit bribing a government official. Under some countries' laws, such as the United Kingdom's Bribery Act, bribing non-government officials (called "commercial bribery") is also a crime. In addition, all JBT employees, and anyone working on JBT's behalf, regardless of their location or place of business, must comply with the U.S. Foreign Corrupt Practices Act ("FCPA"). The FCPA makes bribery of foreign government officials a crime and applies wherever JBT conducts business.

To comply with anti-bribery laws, no employee, nor anyone working on JBT's behalf, should ever offer, directly or indirectly, any form of gift, entertainment or anything of value to a government official in order to:

- Obtain or retain business.
- Influence business decisions.
- Secure an unfair advantage.

Similarly, we must never offer or accept a "kickback." JBT also prohibits any act of commercial bribery. We may not retain a third party to engage in any activity that we are prohibited from participating in ourselves. This includes any agents, sales representatives, distributors and certain resellers.

Anticorruption laws are complex, and the consequences for violating these laws are severe. Remember never to give anything of value, even something you think is nominal, to a government official without first seeking the advice of a Company attorney. If you are unsure whether you might be dealing with a government official or have any other questions on complying with anti-bribery laws, you should contact a Company attorney for guidance. You should also review the Company's comprehensive Anticorruption Policy, which contains specific and detailed guidance about payments to government officials, the payment of gifts and entertainment expenses generally, and the retention of third parties such as consultants, agents, distributors and other intermediaries.



## Definitions

**Bribe:** What is a bribe? It can be easy to unknowingly cross a line even when your intentions are good. What might seem to be healthy relationship-building can cross over into bribery. Examples of a bribe can include:

- Cash and cash equivalents (gift cards or gift certificates).
- Gifts, entertainment and hospitality.
- Payment of travel expenses – especially when there is not a clear business purpose for the trip.
- Vacations.
- Offer of a job or other assignment in the future.
- Political contributions.
- Scholarships for a government official's child.
- Donations to a government official's charity.

**Commercial Bribery:** “Commercial bribery” refers to offering a bribe to our customers, suppliers or anyone working on their behalf with the intent to obtain or retain a business advantage.

**Government Official:** A “government official” includes a person who works for or is an agent of a government-owned or government-controlled entity. For purposes of anti-bribery laws, government officials include:

- Officers and employees of a government (federal, state or local) department, agency or instrumentality.
- Any person acting in an official capability for or on behalf of any government department, agency or instrumentality.
- Political parties, political party officials and candidates for public office.
- Officers and employees of government-owned commercial enterprises – which is common where state-ownership of commercial businesses is prevalent (such as in China).
- Officers and employees of public international organizations, such as the United Nations or the World Bank.

**Kickback:** A reward provided to an employee or business for making or fostering business arrangements.

## FAQs

**Q: We do business in a number of countries where many of the businesses and organizations are run by the state. How do I know if the person I am dealing with is a “government official”?**

**A:** In a situation like this, you should assume that all employees of state-owned organizations or companies, and their agents, are “government officials.” Numerous local and national laws apply when the government is involved, so ask a Company attorney for help.

**Q: In my country, it is common for businesses to provide nice gifts to their customers around the holidays. In fact, my contacts at some of our business partners expect to receive gift cards, an expensive food or wine basket, or electronics such as iPads. May I provide gifts to these individuals?**

**A:** While it is important to respect customs and traditions, we must not engage in any activity that could qualify or be seen as bribery. Just because other companies do something does not mean it aligns with the JBT values or policies. Any gifts given must comply with the Anticorruption Policy as well as the Gifts, Entertainment, Travel & Expense Policy. Examples of acceptable gifts include JBT-branded items (hats, pens, etc.) and non-lavish food items. Gifts should be directed to the recipient business and not to a specific individual.

## Our Ask of You

- Do not offer, give or accept bribes or accept or provide any other type of improper payments or benefits.
- Avoid even the appearance of making business decisions based on improper payments.
- Never use a third party to perform an act (such as paying money or giving a thing of value) that you, as a JBT employee, would be prohibited from engaging in directly under our policies.
- Report any suspicion of bribery or violation of the JBT Anticorruption Policy, whether it involves a JBT employee or a third party.



### To Learn More

- [Anticorruption Policy](#)
- [Gifts, Entertainment, Travel & Expense Policy](#)

JBT strictly adheres to what are called “competition” laws in many countries and “antitrust” laws in the United States. These are laws that protect markets around the world from anticompetitive behavior. Competition laws prohibit anticompetitive agreements, such as price fixing and efforts to unfairly eliminate competitors.

All JBT employees and anyone working on JBT’s behalf must be careful to avoid even the appearance of agreeing with a competitor to limit how we compete with one another.

It is important that we comply with all applicable competition laws when interacting with our suppliers and customers.

We must never use an unfair practice to take advantage of any party with whom we do business. Honesty and personal integrity must be our guide in all of our business activities. We must make only accurate statements about JBT and our products.

## FAQ

**Q: Recently, I had lunch with an old friend who is in sales at one of our competitors. We used to work together and decided to catch up on old times. The majority of the conversation was about our personal lives; however, we did speak about our current jobs. My friend began to share information with me about their market pricing strategy. I told him that we shouldn’t be discussing this information. What else should I do?**

**A:** You did the right thing by ending the conversation. However, the issue does not end there. Because competition laws take into account even the appearance of collusion, you should make it clear that this topic is off limits. Then, you should report the conversation to a Company attorney. Keeping our Company informed of such issues will help us deal with them appropriately – before they become larger problems.



### To Learn More

- [EU Competition Law Policy](#)
- [US Competition Law Policy](#)

## Our Ask of You

- JBT employees may never use, copy or give confidential or proprietary information to competitors. If you happen to obtain such information about a competitor, safeguard it and contact a Company attorney immediately.
- Be careful when communicating or meeting with competitors. Do not:
  - Discuss fees or other aspects of JBT’s pricing or compensation with competitors.
  - Discuss or agree with competitors to restrict the types of products or services offered by JBT.
  - Disclose confidential or misleading information about JBT.
  - Seek or accept inappropriate or confidential information to which JBT should not have access.

As these types of agreements may, under certain circumstance, violate competition laws, seek advice from a Company attorney before engaging in the following:

- Entering into an exclusive agreement with a customer or supplier.
- Setting the price or terms under which our customers or licensees can resell our products.

When dealing with customers, suppliers, business partners or competitors, we must:

- Provide accurate information when marketing and selling our products.
- Avoid making misleading, false or exaggerated claims concerning our products or those of our competitors.
- Do business in a straightforward and transparent manner.

## Trade Compliance

JBT delivers its products, services and technology to customers all over the world. Therefore, we must adhere to trade restrictions that apply to international trade. Whether a product or technology may be exported from one country to another depends on many factors, such as the nature of the item, its country of origin and destination, and its end use and end user. Trade restrictions take many forms, including restrictions on:

- Exports to a sanctioned country.
- Imports from, or dealings in property originating in, a sanctioned country.
- Travel to or from a sanctioned country.
- New investments in a sanctioned country.
- Transactions or shipping arrangements involving a sanctioned country or designated individuals and entities.

The Company has resources for assisting you with the identification of sanctioned countries and designated individuals and entities with respect to which export restrictions exist. Trade restrictions may also impose a requirement to obtain government licenses to export certain products or technology that may be considered to have a military use.

Contact your business controller or a Company attorney for information about these resources.

We are required to obtain any necessary licenses and verify the recipient's eligibility to receive any items sent outside the country of origin. Just as we are unable to trade with ineligible persons, entities or countries, we may not ask a third party to take part in this activity on our behalf.

Exporting goods or technology without the appropriate government approvals can result in the loss of export privileges, as well as civil and criminal penalties for the individuals involved and JBT. For guidance on export controls, please contact a Company attorney. If your job addresses importing, exporting or trade compliance matters in any respect, you should review JBT's OFAC Primer & Guidelines.

### Anti-Boycott Laws

At all times, we follow U.S. anti-boycott laws that prohibit us from participating in unsanctioned boycotts.

Requests to participate in a boycott may be difficult to identify. They may be spoken or written requests and are often contained in proposals originating out of countries that support the requested boycott but may also appear in letter of credit conditions and in shipping documents. Because violations of U.S. anti-boycott laws are serious, and can include civil and criminal penalties, you must report any suspected request to participate in an illegal boycott to a Company attorney. Ignoring or refusing the request is insufficient; the receipt of the request may be viewed and treated as a violation of anti-boycott laws if not properly reported. If you have additional questions, refer to JBT's Foreign Boycott Policy or seek guidance from a Company attorney.





## Trade Compliance

### Our Ask of You

- Understand the law and our policies. If you are involved in international business transactions, it is important that you know and comply with the requirements associated with the countries in which you do business. Trade regulations are complex and dynamic. If you have any questions, contact a member of our trade compliance team or a Company attorney immediately.
- Do not cooperate with unsanctioned boycotts. If you receive a request to participate in a boycott or are asked about our position on a boycott, contact a Company attorney immediately.

### Definitions

**Boycott:** A “boycott” occurs when one person, group or country refuses to do business with certain people or countries.

**Export:** An “export” is not only the transfer of a physical commodity — it can include the transfer of services or technology (such as technical data or other information) to a citizen of another country, even if such person is a JBT employee, by:

- E-mail.
- Face-to-face discussions, either in the U.S. or abroad.
- Visits to a JBT facility.

### FAQ

**Q: A supplier has asked that we send payments to a new address outside the country of business. I am suspicious that there might be something illegal or inappropriate going on. What should I do?**

**A:** You are right to be suspicious. This may be an effort to launder money or to otherwise avoid legal or tax requirements. You should contact a Company attorney without delay. If possible, until you hear otherwise, do not have any further discussions with the supplier about the request.



### To Learn More

- [OFAC Primer](#)
- [Import/Export Trade Compliance Policy](#)



## Political Contributions

JBT employees may make personal contributions to the causes of their choice. Employees are encouraged to participate in personal political activities, but your involvement must be on an individual basis, on your own time and at your own expense.

JBT time, assets or resources must not be used for political activity.

### Our Ask of You

- Understand and follow the restrictions around gifts and interactions with government officials.
- Do not use JBT time, assets or resources for political activities without first consulting with a JBT attorney.
- Never pressure others to contribute to, support or oppose any cause, political candidate or party, and do not solicit contributions or distribute political literature during work hours.



### To Learn More

- [Political Contributions Policy](#)

### FAQ

**Q: I went to a fundraising dinner for a candidate for a local government office. This candidate takes positions favorable to JBT's interests. Can I claim the dinner on my expense report?**

**A:** No. If you did this, it would be considered a political contribution from JBT. While you are free to attend political fundraising events as an individual, you must not use JBT assets or funds, or give the impression that you are representing the Company.

## Gifts, Favors, Gratuities and Vendor Relations

Business gifts and entertainment can build goodwill and can create lasting relationships, but they can also make it harder to be objective about the person giving or receiving them. Some gifts and entertainment can even be seen as bribes that can damage JBT's reputation and may violate the law, where their value to the recipient may be so great as to risk being considered an improper inducement.

"Gifts and entertainment" include anything of value, such as cash, use of vehicles or vacation facilities, stocks or other securities, meals, tickets and gift certificates. The potential list is endless – these are just examples.

Because gifts and entertainment can cross the line between goodwill and improper influence, JBT has adopted policies that ensure appropriate oversight exists that is summarized below. For a complete statement of that policy, please refer to JBT's Gifts, Entertainment, Travel & Expense Policy.

At JBT, it is critically important to remember the following when giving or receiving gifts and entertainment in connection with JBT business:

- All gifts and entertainment must be recorded properly in accordance with Company accounting and expense reporting policies.
- Some gifts and entertainment require pre-approval.
- Some gifts and entertainment are never acceptable.

### Proper Accounting

Any expenditure for a gift or entertainment must be accurately described in expense reports and accounting records and should be supported with adequate documentation to create an understandable record.

### Pre-Approval Requirements

JBT's Gifts, Entertainment, Travel & Expense Policy provides guidance on gifts and entertainment that are generally acceptable to give or receive. But for certain types of gifts and entertainment, prior written approval is required before proceeding, usually from the person responsible for approving your expense reports and in some cases by a Company attorney.

Some examples in this category include:

- Any type of gift or entertainment provided to a government official (who may be considered a government official may surprise you, see the Anticorruption Policy).
- Gifts and entertainment with a total value over U.S. \$100 (excluding meals, sporting events, public entertainment events or other customary forms of business entertainment when hosted by a JBT employee or representative).
- Any type of gift with a value over U.S. \$250.
- Any type of political or charitable contribution.

**CAUTION:** Never offer or provide any gift, entertainment or other item of value to a government official or employee of a government-owned enterprise without seeking prior approval from a Company attorney. If you find yourself in a situation that involves a request of a gift or entertainment by a government official or employee or an employee of a state-owned enterprise, contact a Company attorney immediately.





## Gifts, Favors, Gratuities and Vendor Relations

### Gifts and Entertainment That are Never Allowed

Certain other types of gifts and entertainment are simply wrong in a business environment, either in fact or in appearance, so that they are never permissible, and no one can approve these. As examples, JBT employees and representatives may never:

- Give any gift or offer entertainment that would be illegal or result in any violation of law.
- Accept, request or offer any gift of cash, bank checks, money orders, investment securities, loans, stock or stock options.
- Accept, request or offer anything as a “quid pro quo,” or with the expectation of getting any benefit in return for the gift or entertainment.
- Accept, request, offer or participate in any entertainment that is unsavory, sexually oriented and indecent or otherwise violates our commitment to integrity (including “adults-only” establishments, escort services or any sexual services).
- Provide excessive gifts or entertainment to parties at or near a time when a business decision or other determination that affects JBT’s business is pending.

- Provide gifts or entertainment personally to avoid having to seek approval or reporting requirements.
- Provide gifts or entertainment that have been requested or encouraged by the intended recipient.

For more guidance on gifts and entertainment that are acceptable, require approval or are prohibited, please refer to the Gifts, Entertainment, Travel & Expense Policy.

### Doing Business with Governments

We are mindful that special rules apply to contracts with governments and state-owned enterprises. We honor our contractual commitments to these customers and follow all applicable laws for transacting in the public marketplace. We hold ourselves accountable for meeting the obligations imposed by this type of business and ensure we act with honesty and integrity.

A few examples are laws and regulations that may restrict JBT employees or representatives from making contributions to political campaigns, contacting government employees during restricted periods, influencing legislative or executive action, giving anything of value or offering employment to government personnel. There are also requirements to report lobbying activity, which can be defined very broadly. You should work with a Company attorney if you have any questions about these issues.

## Gifts, Favors, Gratuities and Vendor Relations

### Our Ask of You

The important aspect to remember is that each of us must avoid even the appearance of a conflict of interest or lack of objectivity in our business judgments, so avoid any situation where it would appear to an outsider that your decisions could have been influenced because of business entertainment or gifts.



### To Learn More

- [Gifts, Entertainment, Travel & Expense Policy](#)

### Definitions

**Bribe:** Giving, offering or accepting things of value to or from anyone for an improper purpose.

#### Government Official:

- Any officer or employee of any national, state or local governmental body, department or agency, or political party and any candidate for political office.
- Any officer or employee of any entity owned or controlled by any national, state or local government, including those that are engaged in ordinary commercial activity.
- Any person acting in an official government capacity regardless of rank or position.
- Any officer or employee of a public international organization, such as the United Nations, UNESCO, the World Bank, the International Monetary Fund, the Asian Development Bank and similar institutions.
- Any person deemed to be a government official under applicable law or regulation.

If you are unsure whether an individual is a “Government Official,” you should seek assistance from a Company attorney.

**Thing of Value:** Anything that might benefit the recipient, either directly or indirectly. Examples include cash, employment, gifts, entertainment, travel, meals, products, charitable contributions and loans.

**Quid Pro Quo:** A favor or advantage granted in return for a favor or other thing of value.

### FAQ

**Q: A supplier offered me four tickets to a sporting event. The supplier will not be attending the game with me. Each ticket has a face value of U.S. \$45. Is it OK to accept these?**

**A:** No, not without prior approval. This is a gift that exceeds the dollar amount set in our policy. The limit applies to the total gift, which in this case would be U.S. \$180.



## Conflicts of Interest

**We must avoid any actual or apparent conflicts of interest.** Conflicts of interest arise in many different forms. We need to avoid any situation that might put us in such a position or create even the appearance of bias. If you have knowledge about a possible conflict of interest, you should disclose it immediately to your manager and Human Resources.

Here are some of the more common situations involving conflicts of interest:

### Doing Business with and Supervising Family Members

We must avoid personal relationships that could improperly influence, or appear to improperly influence, business decisions. Therefore, absent prior written approval by an appropriate managing supervisor, employees cannot have direct, or indirect, reporting responsibility over a family member, or someone with whom they are in a committed relationship.

Also, absent prior approval by an appropriate managing supervisor, employees of JBT may not, directly or indirectly, engage our Company in a business relationship with a family member or a business in which a family member is an owner, partner, officer or director.

### Outside Employment and Affiliations

Any work or services you provide to organizations other than JBT can be an issue if that activity interferes with your obligations at JBT. However, if you have a second job with, are performing services for, or are serving as a director or consultant for an organization that is a competitor, customer or supplier of goods or services to JBT, this raises an actual or possible conflict of interest. This is also true if you are working for an organization that is seeking to become a competitor, customer or supplier.

Some arrangements of this kind are never permissible — for example, working for or providing services to anyone you deal with as part of your job for JBT. No outside affiliations with competitors, customers or suppliers are permitted unless you obtain prior written approval from an appropriate managing supervisor.

### Jobs and Affiliations of Close Relatives

The work activities of close relatives can also create conflicts of interest. If you learn that a family member works or performs services for JBT or any competitor, customer or supplier, promptly notify your manager or JBT contact. In general, a relative should not have any business dealings with you, with anyone working in your business or with anyone who reports to you. You must also be careful not to disclose any confidential business information to any relative.





## Conflicts of Interest

### Our Ask of You

- Immediately disclose any actual or potential conflict of interest to your manager and as part of the annual ethics certification process.
- Maintain a written record of a conflict waiver for the duration of the conflict.

### Definitions

**Conflict of Interest:** When a personal or family interest interferes with an employee's ability to make sound, objective business decisions.

**Relative:** Includes the spouse, domestic partner, anyone in a romantic relationship, and, whether by blood, adoption, marriage or domestic partnership, the child, parent, grandparent, sibling, grandchild, aunt or uncle, niece or nephew, cousin (to the second degree) or any person residing in the immediate household (or the household of the spouse or domestic partner of any of these relatives) of the JBT employee, or his, her or their spouse or domestic partner or person in a romantic relationship.

### FAQ

- Q. My brother-in-law works for a local company that often provides goods and services to our office. Given that I am now involved in purchasing supplies for JBT, could selecting his company create a conflict of interest?**
- A.** Yes. You need to let your manager and a Company attorney know about your brother-in-law's affiliation with a JBT supplier and receive approval to use that company. If you don't, other suppliers could claim that your decisions to purchase supplies from his company shows bias or favoritism. By disclosing your brother-in-law's role with our supplier, you ensure that the Company's reputation for fairness and objectivity remains intact.



To Learn More

[Conflict of Interest Policy](#)

## A Letter from our Executive Vice President, General Counsel and Chief Compliance Officer

**Dear JBT Team,**

When developing the One JBT Guide to Ethical Conduct, our goal was to highlight our shared commitment to our values of Integrity, Accountability, Relentless Improvement and Teamwork. Conducting business according to our values is core to who we are at JBT. Our Guide should serve as a resource for navigating difficult situations that may arise during the course of your work at JBT. The Guide was developed to help inform our behavior, decisions and actions in a manner consistent with our values. It may not contain the answer to every situation that could arise, but our values are our guideposts and the Guide identifies multiple resources to help our global employees address issues as they arise. We want all employees to have the tools necessary to uphold our values and safeguard our reputation.

Although the path may not always be clear, even the most difficult issues can be resolved in an ethical way that upholds our One JBT values. It is important that you communicate your concerns, speak up and ask for help when needed. Your supervisors are here to support and guide you in ethical decision making. I encourage all employees to have open and transparent conversations about Integrity, Accountability, Relentless Improvement and Teamwork so that we can continue to foster an ethical culture and actively manage our business reputation with our customers, our shareholders and our fellow team members.

**Thank you,  
James L. Marvin**



---

### About JBT

John Bean Technologies Corporation (JBT) is a leading global technology solutions provider to high-value segments of the food and beverage industry. We design, produce and service sophisticated products and systems for multi-national and regional customers through our FoodTech segment. JBT employs a worldwide workforce and operates sales, service, production and sourcing operations in more than 25 countries.