

A FedEx delivery person, a Black man, is walking up a set of white stairs against a solid orange wall. He is wearing a dark blue FedEx uniform with purple accents and is carrying a white FedEx Express box. The box has the FedEx logo and the word 'EXPRESS' on it. The man is looking down at the box as he ascends the stairs.

FedEx Code of Conduct

Our Guide to Delivering the Purple Promise



FedEx Code of Conduct

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Letter from the Executive Chairman

Trust and reliability are critically important to our customers. FedEx team members earn this trust each day by delivering the Purple Promise — to make every FedEx experience outstanding.

What guides team members toward trustworthy behaviors is the FedEx Code of Conduct. It shows us how to act lawfully and ethically at all times, even if it costs us business or profits in the short term.

Please read this Code to develop a working knowledge of the laws and ethical standards that directly affect your job. In addition, since the Code cannot cover every situation, it's important that you read other FedEx policies, manuals and handbooks as well. Above all, don't hesitate to ask your manager, human resources, or a FedEx attorney to advise you before making a decision.

If you believe that a legal or ethical violation has occurred, report it to your manager, human resources, security or legal departments, or the FedEx Alert Line. Our Code and policies forbid any form of retaliation against you for reporting concerns in good faith.

Our officers, directors and managers have the additional responsibility of promoting the principles set forth in the Code and fostering a culture in which ethical conduct is recognized, valued and demonstrated by all team members. Our commitment to doing the right thing depends on our leaders' ability to set the proper tone and address suspected violations promptly, with care and respect.

Thank you for taking the time to read and comply with this Code, and for your continued dedication to maintaining our outstanding reputation for trust and reliability. Remember, when it comes to integrity, every action matters.

Sincerely,



Frederick W. Smith

Founder and Executive Chairman



What Connects Us Makes Us Stronger

The FedEx Code of Conduct connects all FedEx team members, no matter where we are around the globe. The Code sets out principles of ethics and business conduct that enable each of us to deliver the Purple Promise for our customers, communities and each other.

The Code applies to every officer, director, manager and employee (collectively “team members”) of FedEx Corporation and its subsidiary companies. Certain sections of this Code also apply to third parties performing services on behalf of FedEx. You should read the Code, together with any other FedEx policy, manual, handbook or contract that applies to your job, as ethical and business conduct questions arise.

Examples of Third Parties:

- > Express Global Service Participants
- > Ground Service Providers
- > PUD Subcontractors
- > Linehaul Subcontractors
- > Cartage Agents
- > FedEx Authorized Ship Centers





Every Action Matters

At FedEx we are committed to the Purple Promise: I will make every FedEx experience outstanding. This commitment sets the bar for excellence, helping us earn the **trust** and loyalty of our team members, customers and communities and making FedEx one of the most admired companies in the world and a great place to work.

Complying with the law and acting ethically are essential parts of delivering the Purple Promise. Some types of laws affect everyone, such as those concerning health and safety. Other laws primarily affect team members and third parties in particular roles, such as those concerning the operation of our transportation networks, financial reporting or customer service. In the Code, we break down key laws and ethical standards into the principles of integrity and business conduct that apply to our actions every day.

If you have questions about the principles described in the Code, ask your manager, your operating company's human resources, security or legal department, or the Corporate Integrity & Compliance Department at integrity@fedex.com.

When it comes to integrity and business conduct — EVERY ACTION MATTERS!

Earning the Trust of Our Team Members

We develop highly motivated and effective team members by fostering a safe workplace that values diversity, inclusion, teamwork and respect for each other and FedEx.





Responsibilities of FedEx Team Members

As FedEx team members, we all must act with integrity and maintain the trust of our fellow team members, customers and communities. We're responsible for:

- > Reading and following the Code
- > Asking questions
- > Promptly reporting any known or suspected violations of law, the Code, or FedEx policies and procedures



Our Code in Action

Q FedEx raises the bar for performance each year, and we always seem to be under pressure to achieve better results. Do my obligations to meet business and financial goals come before my obligations in this Code?

A No. Our interests are never served by unlawful or unethical business conduct. FedEx is one of the most trusted brands in the world. Maintaining the highest ethical and professional standards is critical to maintaining this valuable trust.

Responsibilities of FedEx Managers

FedEx managers have additional responsibilities under the Code. Showing your commitment to ethics and integrity in your everyday actions is the single most important factor in earning trust and fostering a culture in which team members follow the Code. You're responsible for:

- > Reading and following the Code
- > Reinforcing key messages in the Code
- > Ensuring team members are comfortable speaking up and asking questions
- > Being available and listening when team members have questions or concerns
- > Preventing retaliation against team members who report concerns in good faith
- > Enforcing the Code and FedEx policies and procedures promptly and consistently





Health and Safety

We are committed to maintaining a healthy and safe workplace. We must comply with the health and safety laws and policies that apply to our jobs and prevent unsafe working conditions — no exceptions! This includes maintaining an alcohol-free and drug-free workplace in accordance with FedEx policies and national, state and local laws. Third parties who work with us must also follow all health and safety laws and FedEx policies and commit to keeping our workplaces free of alcohol and drugs.



We're all responsible for reporting unsafe working conditions. Report concerns about workplace health or safety to your manager, your safety specialist, your operating company's human resources or legal department, or the FedEx Alert Line.

Our Code in Action

Q I hurt my back at work, but I don't want to report it because I was partly to blame and it will break my team's injury-free record. What should I do?

A You must report all injuries or accidents to your manager, a safety specialist, human resources or your FedEx business contact as soon as possible so FedEx can take action and work to prevent similar incidents in the future.

Workplace Security

We are committed to maintaining a safe and secure workplace. We prohibit, and will not tolerate, violent or threatening behavior by or against FedEx team members, third parties or other individuals. Prohibited activities include intimidation, bullying, stalking, physical assaults, and written, spoken or physical threats directed at a team member, third party or other individuals.

We're all responsible for reporting situations that have the potential for workplace violence. Never assume that a threat or suspicious activity indicating a potential for workplace violence is not serious. **All threats or suspicious activities must be reported.**

- > If it is an emergency and you're in the U.S., dial **911**. Outside the U.S., call your local emergency response number.
- > If the threat or actions indicate a potential for violence, but do not pose an immediate danger, report the situation to your manager, FedEx Security or the FedEx Alert Line.
- > Finally, in many locations team members may use LiveSafe to receive security notifications, connect to emergency response numbers and report tips and information to FedEx Security. LiveSafe is available through the LiveSafe mobile application, the Workday mobile application or designated computer terminals at FedEx facilities.

Other Resources

- Workplace Violence Prevention

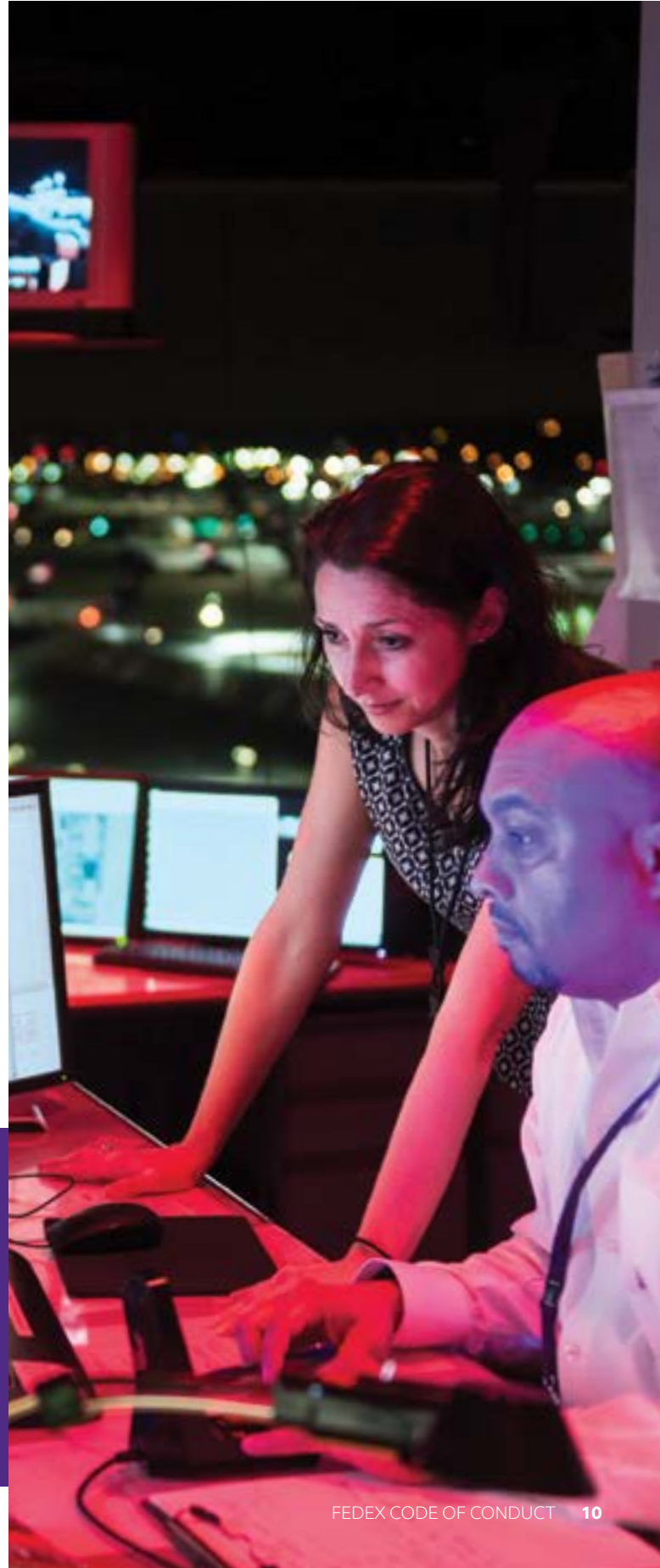
Our Code in Action

Q

One of the team members on my shift is easily agitated and has made comments that make me afraid for my safety. What should I do?

A

Report your concern to your manager, FedEx Security, LiveSafe or the FedEx Alert Line. FedEx takes signs of potential workplace violence very seriously and will act to ensure we continue to provide a safe work environment.



Equal Opportunity and Anti-Harassment

Our greatest asset at FedEx is our people. We are committed to equal opportunity, fairness, respect and inclusion and do not tolerate discrimination or harassment based on race, color, ethnicity, national origin, religion, sex, age, genetic information, citizenship, disability, marital status, pregnancy, sexual orientation, gender identity, gender expression, veteran status or any other characteristic protected under national, state or local laws.

We recruit, hire, contract, evaluate, compensate and promote based on job-related qualifications and performance. We will reasonably accommodate team members and third parties with physical and mental disabilities unless such accommodation imposes an undue hardship on our business.

We prohibit sexual harassment. Sexual harassment may take many forms, including unwelcome sexual advances, requests for sexual favors, threats and unwanted physical contact. Sexual harassment may also occur through words or actions such as inappropriate comments or gestures, unwelcome email or text messages, or pictures or comments posted on social media.

IT COULD BE HARASSMENT

If it **looks** like this



inappropriate images



indecent gestures



unnecessary touching

Or **sounds** like this



discussing sexual activity



name calling

#@!%

bad language



commenting on physical attributes



crude jokes

If you witness or experience discrimination or harassment, report it to your manager, your operating company's human resources or legal department, or the FedEx Alert Line.

Our Code in Action

Q I heard my manager say that when a woman becomes pregnant, it interferes with her job performance. I believe I did not receive a promotion because my manager knows I am pregnant. Is there anything I can do?

A Yes. You should report the situation to your company's human resources or legal department. If you wish to remain anonymous, you can make a report through the FedEx Alert Line.

Human Rights

We are committed to protecting and advancing human rights in all of our operations around the world. We prohibit the use of child, compulsory or forced labor. We have zero tolerance for, and prohibit, slavery and human trafficking. We pay fair wages and comply with wage laws in all the countries where we operate. We require our third parties and suppliers to uphold these important principles.

Other Resources

- Policy Prohibiting Trafficking in Persons

Conflicts of Interest

FedEx respects team members' rights to manage our outside activities and financial interests. At the same time, while employed by FedEx, our primary business loyalty must be to FedEx. If personal interests create, or appear to create, conflicts of interest at work, it may affect our ability to act honestly and in the best interests of FedEx when making business decisions.

To avoid conflicts of interest, we must avoid activities, investments or close personal relationships that create, or appear to create, a conflict between our personal interests and the interests of FedEx. Close personal relationships include people who are family members, living together, dating or engaging in an intimate relationship. In addition, FedEx specifically prohibits team members or close personal relationships from accepting money, gifts or personal benefits in return for awarding FedEx business.

If you become aware of an actual, potential or apparent conflict of interest, you must disclose the conflict to your manager in writing. Your manager will assess the situation and work with human resources or legal, as appropriate, for review, guidance or action.

Unless preapproved by the Executive Vice President and Chief Financial Officer of FedEx Corporation, you may not hire any person who has been employed during the preceding three years by FedEx's independent auditor (currently, Ernst & Young LLP).

Other Resources

- Global Gifts & Entertainment Policy

PROHIBITED ACTIVITIES:

- > Forced labor
- > Confiscation of identity or immigration documents
- > Use of recruiters who violate local labor laws
- > Misleading claims about wages, benefits, location of work, housing and job hazards

SITUATIONS THAT COULD LEAD TO A CONFLICT OF INTEREST:

- > Work outside FedEx
- > Hiring or managing close personal relationships
- > Board memberships
- > Ownership or financial interests
- > Being paid by a vendor or supplier to write an article or speak at an event

Our Code in Action

Q I was recently promoted to manager. My girlfriend also works at FedEx and now reports to me. We both want to keep our jobs at FedEx. What should we do?

A Managing your girlfriend creates a conflict of interest. You should disclose your relationship in writing to your manager. Your manager will review the situation and involve human resources or legal to address the conflict.



Corporate Opportunities

We are committed to protecting FedEx business opportunities. Third parties, suppliers, customers and others routinely present ideas and opportunities to FedEx. In addition, we may discover or develop ideas for new FedEx business, technology or investments. These ideas and opportunities are the exclusive property of FedEx. Team members may not take FedEx technology, ideas or opportunities for personal benefit or compete with FedEx without the prior written consent of your operating company's legal department.

Officers and directors have additional responsibilities to protect FedEx business opportunities and should contact FedEx Corporation's General Counsel for questions or guidance.

Our Code in Action

Q I recently spoke to a supplier who told me about a technology company that FedEx may have an interest in buying. May I invest my own money in the technology company?

A Before investing, you should disclose all of the details to your operating company's legal department and wait to receive written consent to proceed.

Intellectual Property

We are committed to respecting patents, copyrights, trademarks and other intellectual property, including those that belong to FedEx. We will not reproduce copyrighted material or use intellectual property unless we have a license or permission to do so. Likewise, we distribute software only in accordance with the terms of applicable license agreements. Any use of open source software must be preapproved by our Information Security department and your operating company's legal department.

We are committed to defending FedEx patents, copyrights and trademarks around the world. The FedEx name and trademark may only be used in accordance with applicable licenses and brand guidelines.

Theft, Damage or Loss

As part of our Purple Promise we are committed to protecting FedEx and customer resources and reporting potential theft, damage or loss. Do not steal or mistreat FedEx or customer resources. Theft, damage and loss have a direct impact on our efficiency and ability to deliver the Purple Promise.

FedEx provides facilities, equipment, transportation and technology for use when carrying out our duties and responsibilities for FedEx. Always exercise good judgment when using FedEx resources. Technology resources such as laptops, power pads, tablets and smartphones are provided to help do your work for FedEx. Minimal personal use of FedEx technology resources may be acceptable if it's allowed by your FedEx operating company and does not interfere with your job duties. However, almost any form of communication using FedEx resources may be a company record. Unless prohibited by law, FedEx reserves the right to retrieve and review your FedEx laptop, power pad, tablet, smartphone and any information stored on FedEx servers, including emails, text messages and internet browsing history, with or without your knowledge or consent.

If you witness or become aware of potential theft, damage or loss our Purple Promise encourages you to report it to your manager, your operating company's human resources or security department, LiveSafe or the FedEx Alert Line. We will promptly respond to your report and may, at management's discretion, reward team members and third parties who provide information that leads to the discovery of theft, damage or loss.

EXAMPLES OF ITEMS THAT SHOULD NOT BE COPIED WITHOUT LICENSE OR PERMISSION:

- > Copyrighted books, articles, music, videos or pictures
- > Licensed software
- > Licensed trademarks

Our Code in Action

Q I'm preparing a presentation for a customer and found music and video clips on the internet. Can I include these in my presentation?

A It depends. The music and videos may be copyrighted. Check with your operating company legal department or legalreview@fedex.com before using them in your presentation.

Confidential Information

We are committed to protecting FedEx confidential information. Confidential information is any non-public information about FedEx business, team members, customers and suppliers such as business plans, pricing, costs, internal financial information, personal data, research and development, FedEx-owned technology, marketing plans and any other competitive information.

Confidential information should not be misused or disclosed during or after the term of your employment or contract with FedEx. You may disclose confidential information to other FedEx team members or third parties only if they have a legitimate, business-related need to know the information.

Exercise caution when discussing confidential information in public places where conversations may be overheard, such as restaurants or elevators. Avoid reading documents with confidential information in public places, such as airplanes or trains, and do not discard them where others can retrieve them. Finally, where possible and consistent with your operating company's document retention policy, you must securely dispose of documents containing confidential information.

This section does not restrict communications by or between team members about wages, hours, or other terms and conditions of employment. Also, this section does not prohibit you from reporting information to any government agency or self-regulatory organization or engaging in activities protected under whistleblower statutes.

Other Resources

- [Information Security Policy](#)
- [Social Media Guidelines](#)
- [Messaging Application Guidelines](#)

Accurate Recordkeeping

We are committed to maintaining records to meet our financial, legal and operational requirements. Many team members and third parties are involved with FedEx records such as time sheets, expense reports, hours-of-service logs or customer transactions. In addition, some team members and third parties are involved in creating legal, financial or operational records. We must all act honestly and ensure FedEx records are accurate, complete, reliable and secure. Intentional falsification or unauthorized destruction of any FedEx record — whether paper, electronic, scans, video, email, cloud storage, or any other format or location — is prohibited.

FedEx record retention requirements are based on specific laws and business requirements. Regularly check your operating company's record retention schedules to ensure you are maintaining all required records. Never alter or destroy a FedEx record if you have been notified by the legal department that it is the subject of a legal hold because of a pending or threatened legal claim. If there is no legal hold and the scheduled retention period has expired, you should dispose of the record in accordance with your operating company's record retention policy, procedures and schedules.

Our Code in Action

Q There are a lot of new messaging platforms available now. Can I use a messaging app to send a customer pricing information?

A No. FedEx prohibits disclosure of confidential information on social media sites, messaging applications, public blogs, or similar publicly available sites and applications. FedEx has additional guidelines for the use of social media and messaging apps.

Earning the Trust of Our Customers

We listen to customers and strive for excellence that enables us to meet their needs and exceed their expectations while adhering to the highest ethical and professional standards.

Gifts, Travel and Entertainment

We are committed to promoting fair and transparent business decisions and protecting the reputation of FedEx. Reasonable and appropriate business gifts, meals, travel and entertainment help promote relationships with third parties, customers and suppliers. However, we should not give or receive anything that might improperly influence a business decision.

When giving or receiving gifts, meals, travel or entertainment, be sure to understand the limits placed by the FedEx Global Gifts and Entertainment Policy. Business gifts, meals, travel and entertainment should be moderate, appropriate to the country or culture, and intended only to promote business relationships. Gifts, meals, travel and entertainment that are repetitive (no matter how small) may create an obligation to the giver and are prohibited. Gifts of cash or cash equivalents, such as gift cards or gift certificates, are also prohibited.

As a FedEx team member, we may never ask for gifts, meals, travel or entertainment from a third party, customer or supplier. In addition, we may not accept loans or favors from a third party, customer or supplier. These actions may compromise — or appear to compromise — your ability to make fair business decisions.

This policy applies at all times and does not change during traditional gift-giving seasons.

Other Resources

- [Global Gifts & Entertainment Policy](#)
- [Governmental Contacts and Lobbying Disclosure Compliance Policy](#)
- [Global Anti-Corruption Policy](#)

Specific rules apply when offering gifts, meals, travel or entertainment to government officials. Refer to the [Governmental Contacts and Lobbying Disclosure Compliance Policy](#) before offering anything to U.S. government officials and to the [Global Anti-Corruption Policy](#) before offering anything to non-U.S. government officials.

GIVE THIS, NOT THAT

Business gifts build relationships. But they can also look like bribes to outsiders, so we're legally required to manage how we handle them. Here's what's usually OK to give or receive and what you need to avoid.

Usually OK



promo items



flowers



food

COMMON SENSE STILL APPLIES — If it's expensive or you are unsure of the value, double check and get approval before giving or receiving — even if it's one of these things.

Never OK



cash



gift cards and cash equivalents



high-value gifts



vacations

EVERYTHING ELSE — Check with your operating company's legal department.

Our Code in Action

Q A supplier invited me to a conference they sponsor and offered to pay for all my travel expenses, including airfare, meals and accommodations. Can I accept?

A You may not accept the supplier's offer to pay for travel and lodging for you or your family members unless you receive prior approval from your operating company's general counsel. You may accept meals from the supplier as part of attending the conference as long as they are not lavish or excessive and comply with the guidelines listed in the Code and [Global Gifts & Entertainment Policy](#).

Data Security and Privacy

We are committed to maintaining the security and privacy of personal data provided to FedEx by team members, customers, third parties and others. Personal data is any information that can be used directly or indirectly to identify an individual person, and includes a person's name, phone number, address and email address, both business and personal.

We will collect, record and use personal data in a proper and professional manner and are accountable to demonstrate compliance with the principles of data protection, including fair and lawful use, purpose specification, collection limitation, deletion, data quality, security safeguards and transparency.

All personal data provided to FedEx by team members, customers, third parties and others must be treated as confidential. FedEx has implemented technical, administrative and physical procedures to protect personal data from unauthorized access, loss, misuse, alteration and disclosure. Any unauthorized access or processing of personal data by team members or third parties is prohibited. If you discover or suspect a data security incident, a cyberattack or a possible breach of personal data, immediately notify your legal department or Information Security using the Incident Notification Website, keyword "incident."

Other Resources

- [Global Privacy Policy](#)
- [FedEx Binding Corporate Rules](#)
- [Information Security Policy](#)
- [Social Media Guidelines](#)
- [Messaging Application Guidelines](#)



Our Code in Action

Q I noticed that the name and address on a package I was handling is someone who I want to contact about a personal matter. Can I use the package information to get in touch with her?

A The name and address of the shipper and recipient were provided for use by FedEx as part of our business. Any use of the data beyond those business purposes, including contacting the individuals for personal reasons, is prohibited.

Antitrust and Competition

We thrive in competitive markets and are committed to giving customers the best value for our products and services. Antitrust and competition laws protect customers by promoting lower prices, more choice and greater innovation. Actions that violate antitrust and competition laws — such as agreements with our competitors to fix prices; divide customers, territories or markets; or not to recruit each other's employees — are prohibited and simply not the way we do business.

The most serious antitrust violations arise from agreements among competitors. Such agreements do not need to be written or even consist of express commitments but can be inferred from informal agreements, loose talk or the mere exchange of commercial information.

Antitrust and competition laws apply all the time, including at trade association meetings, social gatherings and during other informal contacts. If a conversation with a competitor enters an inappropriate area, make sure to protect FedEx and yourself by ending the conversation at once and reporting the matter to your operating company's legal department immediately.

Other Resources

- Policy on Compliance with Antitrust/Competition Law
- Guidelines for Participating in Trade Associations

WE MUST AVOID ANY DISCUSSIONS WITH FEDEX COMPETITORS ABOUT:

- > Customers
- > Pricing
- > Bids
- > Discounts
- > Team member wages
- > Payments to third parties
- > Sales promotions
- > Terms and conditions of sale
- > Commercial strategies or growth plans
- > Any other FedEx-owned or commercially sensitive information

Our Code in Action

Q What are examples of “acceptable” methods to obtain information about competitors?

A The key is to use publicly available information such as annual reports, regulatory filings, stockbroker or transportation expert analyses, press releases, public internet sites and trade journals.

Insider Trading

We are committed to respecting the role of FedEx in the marketplace and will not use material non-public information for trading stock directly or indirectly or tipping others to trade. Material non-public information is any information about FedEx, or another company such as a FedEx third party or customer, that has not reached the general marketplace and is likely to be important to investors when deciding whether to buy or sell stock.

Using material non-public information to buy or sell stock or to tip others to do so is illegal. We must take care not to disclose material non-public information to relatives, colleagues or friends.

Officers, managing and staff directors, certain other individuals in sensitive positions and FedEx Corporation board members are prohibited from trading in FedEx stock during FedEx-imposed “quiet periods.”

Other Resources

- Securities Manual

Fraud, Accounting and Internal Controls

We are committed to open, honest and fair dealing with each other and our customers, suppliers and competitors and should not take unfair advantage of anyone through fraud, manipulation, deception, concealment, misrepresentation or any other unfair dealing practice.

We are committed to eliminating waste, fraud and abuse from FedEx accounts and maintaining the accuracy of FedEx accounting records. We must comply with the FedEx system of accounting and internal controls to ensure that FedEx accounts are accurate and used only for legitimate business expenses or expense reimbursement. In addition, all FedEx financial transactions, big or small, should be properly documented. Unrecorded or “off-the-books” funds or assets are prohibited.

We must ensure that only authorized persons execute transactions on behalf of FedEx or have access to FedEx assets or systems. Providing false, misleading or incomplete information impairs our ability to make good decisions, undermines trust in FedEx and may be illegal. Consult internal audit or your operating company’s finance or legal department if you have questions regarding FedEx accounting or internal controls.

IF YOU HAVE...

...non-public information about:



a merger, big purchase or sale



new service offerings or leadership changes



financial results or operating performance

...then **make sure to:**



Protect it! Keep that information confidential



Get approval from Legal before trading your stock

Our Code in Action

Q While reconciling my monthly forecast with the actual numbers for the month, I noticed that my expenses exceeded my forecast by a few thousand dollars. I could easily adjust for that small difference and put the amount of the difference into next month’s statement. Should I make the adjustment?

A No. Revenues and expenses must be recorded in the correct time period, and every transaction must be reported accurately. Intentional falsification of any transaction is a serious offense and may result in your termination.



Public Disclosures

We are committed to providing full, fair, accurate and timely disclosures in our public communications and in the reports we file with government authorities, including the U.S. Securities and Exchange Commission (SEC). Our disclosures enable our stockholders to understand:

- > Key business risks and opportunities
- > Critical accounting policies
- > Important judgments we make in preparing our financial statements

We strictly comply with both the spirit and the letter of the laws governing public disclosures and reporting to the SEC. Only certain FedEx team members are authorized to release information on behalf of FedEx as part of their regular duties. Therefore, you may not speak on behalf of FedEx to the SEC, investment analysts, the media or through social media unless it is explicitly authorized as part of your job duties. Any inquiries from the media or investment analysts must be directed to the FedEx Corporate Communications or Investor Relations department.

Other Resources

- [Social Media Guidelines](#)

Our Code in Action

Q A friend of mine recently started a job as a financial reporter. She asked if I could send her information about FedEx planned growth. May I send her this information?

A No. It violates our Code, and potentially U.S. law, to provide information to individual members of the media or investment analysts that has not been previously included in our public filings or other disclosures.

Earning the Trust of Our Communities

We support communities where we do business,
acting as responsible global citizens.



Environment and Sustainability

FedEx recognizes our activities have an impact on the environment and that the long-term health of our business is connected to the health of our planet. We are committed to conducting business activities responsibly and sustainably.

We comply with national, state and local laws where we operate that regulate air emissions, water quality, solid and hazardous waste disposal and the prevention of spills or releases.

We are committed to continual improvement in environmental management. As part of our ongoing efforts to promote sustainability, we continually evaluate the environmental impacts of FedEx operations and packaging and reduce them where possible. We ensure that environmental considerations are integrated into daily operations and business decision-making processes. We focus on sourcing and implementing solutions that will minimize our environmental footprint and protect the environment.

Other Resources

- [Environmental Policy Statement](#)
- [Environmental, Social, & Governance Report](#)



Corruption, Improper Payments and Bribes

We are committed to conducting business fairly and legally and oppose all forms of public and private corruption. We comply with anti-corruption laws and will not offer or pay improper payments or bribes to influence a business decision or gain a business advantage. We will not participate in illegal influence peddling by offering or accepting gifts, entertainment, travel, employment, charitable donations or other benefits to or from an intermediary to influence a government decision or gain a business advantage. We will not request or accept any bribe, kickback or improper payment to award a FedEx contract or business to a third party. Finally, we maintain internal financial controls to prevent bribery and corruption and keep accurate books and records so as not to disguise bribes or other improper payments as legitimate business expenses.

Laws prohibiting bribery and corruption apply to **both** government officials and private business persons. In some countries, team members or third parties may come under pressure to offer improper payments or bribes to influence business decisions or gain business advantages such as sales, government permits, or government or private services. Similarly, team members may be offered a bribe or kickback to award a FedEx contract or business. Never request, offer or agree to bribes, kickbacks or improper payments. They are illegal in most countries, prohibited by FedEx, and can expose you and FedEx to criminal prosecution.

If you are asked to make an improper payment or bribe, or offered a bribe or kickback to award a FedEx contract or business, immediately contact your manager and your company's legal department and report the request or offer.

Be careful when dealing with government officials. Refer to the [Governmental Contacts and Lobbying Disclosure Compliance Policy](#) before offering a gift, meal, travel or entertainment to U.S. government officials and to the [Global Anti-Corruption Policy](#) before offering a gift, meal, travel or entertainment to non-U.S. government officials. When in doubt, seek advice from your company's legal department.

Other Resources

- [Global Anti-Corruption Policy](#)
- [Global Gifts & Entertainment Policy](#)
- [Government Contacts and Lobbying Disclosure Compliance Policy](#)

Our Code in Action

Q The wife of a local elected official invited FedEx to sponsor a fundraiser for an educational charity that she founded. The FedEx lease from the local government is up for renewal at the end of the year. Can FedEx agree to sponsor the fundraiser to build goodwill with the government during the lease negotiations?

A While FedEx does sponsor charity events, this could be considered influence peddling and FedEx may not attempt to influence a government decision by offering a donation to an intermediary. Contact your operating company's legal department to determine whether the sponsorship complies with the Code, our Global Anti-Corruption Policy and any other relevant FedEx charitable giving guidelines.

Corruption, Improper Payments and Bribes Continued

FedEx prohibits “facilitating payments,” which are improper payments made to a government official or employee to expedite or facilitate a routine government action such as issuing permits or clearing a shipment through customs. If you are asked to pay a facilitating payment, immediately contact your operating company’s legal department.

We hire and retain third parties who are committed to complying with our Code and anti-corruption policies. Therefore, FedEx has specific procedures when engaging a third party that may interact with government officials on behalf of FedEx. The [Global Anti-Corruption Policy](#) and your operating company’s Anti-Corruption Compliance Procedures provide detailed instructions to engage third parties.

A GOVERNMENT OFFICIAL IS:

- > An elected official
- > A candidate for political office
- > An official or employee of a political party
- > An official or employee of a government department, ministry or agency
- > An official or employee of a government-owned entity
- > An individual with dual capacity in government and private business
- > An official or employee of a public non-governmental organization

Our Code in Action

Q In my country, making small payments to facilitate government paperwork is common. If these small payments are not made, the paperwork could take months longer. What should I do?

A This type of payment may be illegal and is prohibited under our Code and [Global Anti-Corruption Policy](#). You should notify your management and your operating company’s legal department to determine the best course of action.



International Trade Controls

FedEx is headquartered in the U.S., and we are committed to complying with U.S. trade control laws. In addition, we comply with trade control laws in countries in which we operate, provided they do not conflict with U.S. law. Therefore, we maintain policies and procedures to support compliance and help ensure that we:

- > Do not operate in, or provide services to countries or territories in violation of U.S. embargos
- > Do not deliver shipments that are prohibited for import or export
- > Do not transfer controlled technology, equipment or software without import or export licenses
- > Screen transactions to identify persons or entities on restricted or sanctioned parties lists

At FedEx, we do not participate in boycotts that are not sanctioned by the U.S. government, such as agreements to discriminate based on race, religion, sex, national origin or nationality, or refusal to do business with certain countries or companies not sanctioned by the U.S.

Violations of U.S. and international trade control laws can subject FedEx to substantial penalties. Immediately notify your manager or your operating company's legal department if you are aware of any violation of trade control laws or boycott requests.

Our Code in Action

Q I work for FedEx outside the U.S. Do U.S. trade control laws apply to my job?

A Yes. FedEx is a U.S.-based company, and the operations of all FedEx companies, wherever located, are subject to U.S. trade control laws. Contact your operating company's legal department for guidance on how to comply with specific trade control laws and regulations.





Money Laundering Prevention

We are committed to assisting governments around the globe to detect and prevent criminal activity and terrorist financing enabled by money laundering. Money laundering is the process of making criminal proceeds appear legitimate by concealing or disguising their nature, location, source, ownership or control. We will not enter into any arrangement that has been identified as a potentially suspicious money laundering activity.

Indications of money laundering include:

- > Requests from a third party, customer or supplier for cash payments
- > Unusual payment terms
- > Structuring or breaking down payments or transactions to avoid government requirements
- > Fund transfers to or from countries unrelated to the transaction
- > Fund transfers to or from unrelated third parties
- > Reluctance by a third party, customer or supplier to provide complete or truthful contact information
- > Other activities outside the normal course of business

If you become suspicious of potential money laundering activities, contact your manager or your operating company's legal department immediately.

Political Activities and Contributions

We are free to support the political process through personal contributions or volunteering personal time to candidates or organizations. These activities are a matter of personal choice and must not be conducted on FedEx property or time or involve the use of any FedEx resources such as vehicles, telephones, computers or supplies.

You may not make or commit to political contributions on behalf of FedEx. You may choose to participate in the FedEx Corporation Political Action Committee, but all contributions are strictly voluntary and are not tax deductible. Please keep in mind that by law only U.S. citizens (living anywhere in the world) and U.S. permanent residents are allowed to contribute to the FedEx Corporation Political Action Committee.

Other Resources

- [Policy on Political Contributions](#)

Speaking Up

To maintain the trust of our team members, customers and communities, we're all responsible for compliance with the principles of ethics and business conduct described in this Code.

Open-Door Policy

At FedEx, our Purple Promise encourages us to ask questions, report concerns and bring ideas for improvement directly to our managers or, for third parties, our FedEx business contact. It is important that we speak up promptly so that we keep open lines of communication among managers, team members and third parties and so that questions, concerns or ideas can be addressed.

In addition, if you know or suspect there is a violation of law, this Code, or FedEx policy or procedure, speak up and report it to your manager or your operating company's human resources, security or legal department. We value your participation in ensuring compliance with the principles of ethics and business conduct described in this Code and will promptly respond to your report.

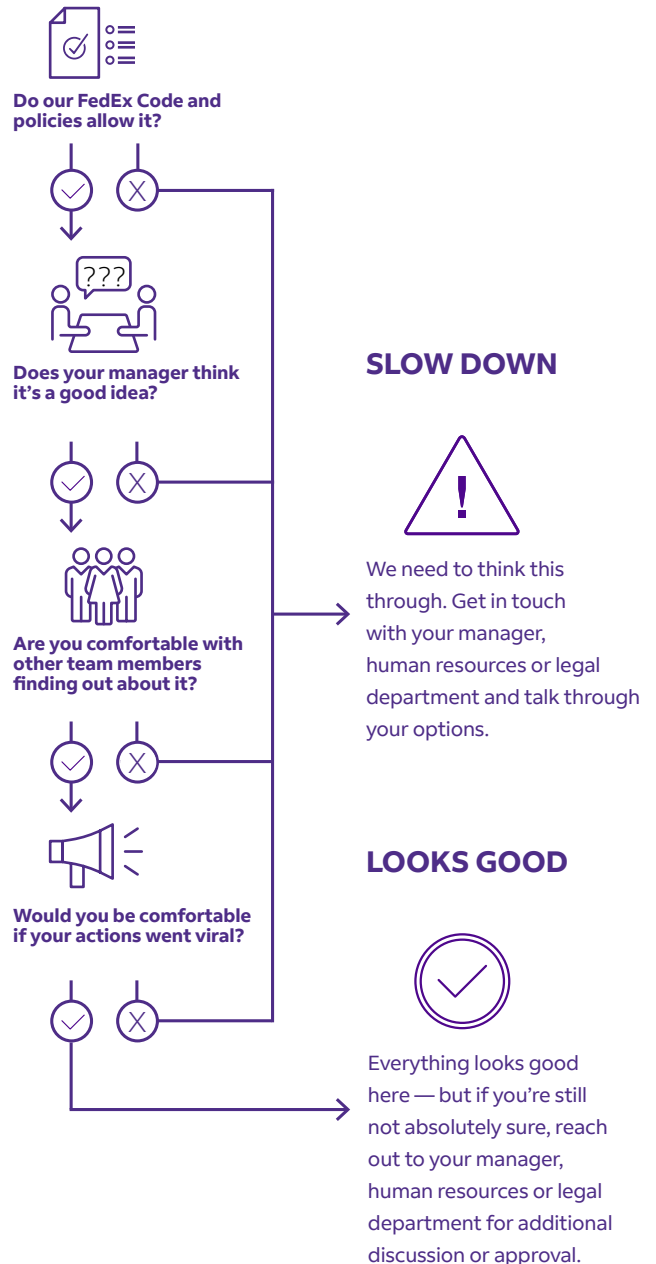
FedEx Alert Line

If, after contacting your manager or your operating company's human resources, security or legal department, your question or concern has not been addressed, or if you wish to remain anonymous, you should report your question or concern to the FedEx Alert Line. The FedEx Alert Line is a **confidential** means of reporting questions or concerns 24 hours a day/365 days a year online or by phone.

Go to fedexalertline.com to report online or find the phone number that applies to your country or territory. In the U.S., the phone number is 1.866.42.FedEx (1.866.423.3339).

In most countries the FedEx Alert Line allows you to provide anonymous reports. However, in some countries, local laws discourage anonymous reporting and you will be required to provide your name in order to submit a report.

STUCK WITH A TOUGH DECISION? HERE'S HOW TO THINK IT THROUGH.





Reports Regarding Fraud, Accounting and Internal Controls

If you become aware of financial fraud or questionable accounting, internal controls or auditing related to FedEx, you are required to report it. Examples of financial fraud and questionable accounting, internal controls or auditing include:

- > Fraud or deliberate error in preparing or auditing any FedEx financial statement
- > Fraud or deliberate error in recording and maintaining FedEx financial records
- > Noncompliance with FedEx internal accounting controls
- > False statement regarding a matter contained in FedEx financial records, financial reports or audit reports
- > Withholding information that would provide a full and fair report of the financial condition of FedEx
- > Fraud in possession or use of company or customer resources

The report should be made to the FedEx Alert Line or the FedEx Corporation General Counsel.

Other Resources

- Policy on Treatment of Complaints Regarding Financial Fraud and Accounting and Auditing Matters

Our Code in Action

Q I'm concerned that my manager may be committing financial fraud against the company, but I'm not sure. What should I do?

A Report your concern to the FedEx Alert Line or the FedEx Corporation General Counsel. Either way, your information will be handled confidentially during the investigation.

Investigations

If you report a violation of law, the Code, or a FedEx policy or procedure to your manager or the FedEx Alert Line, the report will normally be handled by your operating company's human resources, security or legal department, or the FedEx internal audit department, depending on the nature of the report. In each case, FedEx will try to determine if misconduct has occurred, respond in a timely manner and make changes or recommendations. Reports and investigations are kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, provide a fair process to anyone accused of misconduct, and implement follow-up training or corrective action.

You may be asked to assist with an investigation. In such cases you are expected to cooperate and not interfere with the investigation, offer false information, or alter or destroy records.

Non-Retaliation

We are all encouraged to speak up and report violations of law, this Code, FedEx policy or procedure, financial fraud or any questionable accounting, internal controls or auditing related to FedEx. FedEx prohibits retaliation against anyone who reports a known or suspected violation in good faith. Good faith is raising a question or concern that you honestly believe to be true.

FedEx also prohibits retaliation against anyone who assists in an investigation. Anyone who is found to have retaliated against a person who has reported a violation in good faith, or assisted in an investigation, will be subject to discipline, up to and including termination.

Our Code in Action

Q I believe I received a poor performance evaluation after I made a complaint about my manager. Previously, I had always received excellent reviews. What can I do?

A If you believe that you have been retaliated against, you should contact your operating company's human resources or legal department with your concerns. If you are uncomfortable reporting through any of these channels, you should report your concern through the FedEx Alert Line.



Conclusion





Enforcement

FedEx is committed to preventing and detecting behavior that violates this Code. Therefore, we will immediately stop any violations of the Code that are detected and discipline team members who engage in such behavior up to and including termination in accordance with your operating company's policies and procedures.

FedEx managers are responsible for ensuring compliance with the Code, and all other applicable policies and procedures, within their area of responsibility. Managers should promptly report any Code or other violations to their human resources or legal department and address any compliance violations or weaknesses, including taking appropriate disciplinary action. We will discipline managers who fail to exercise appropriate supervision, up to and including termination.

Waivers

FedEx may grant specific waivers to the Code. Applications for waiver should be made to your company's legal department and must be approved by the general counsel of your operating company. Waivers will not be granted to allow violations of law.

Applications for waivers of the Code for executive officers or members of the Board of Directors of FedEx Corporation must be made to the Chair of the Audit Committee of the Board of Directors and must be approved by the full Board. Any such waiver will promptly be disclosed.

Concluding Advice

The FedEx Code of Conduct describes our commitment to ethics and integrity and serves as a guide for all team members. Our objective is to provide you with the information and tools you need to perform your job and maintain the trust of team members, customers and the communities where we do business.

If you find yourself in a situation where you are unsure of what to do, ask your manager, your operating company's human resources, security or legal department, or the Corporate Integrity & Compliance Department at integrity@fedex.com.

By acting ethically and complying with the principles in the Code, we deliver the Purple Promise and help to assure the continued success of FedEx.

Remember – every action matters!

Adopted June 2, 2003

Last amended September 23, 2019

