

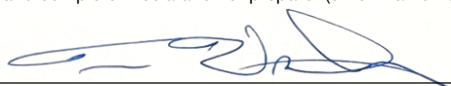
Part II Organizational Action *(continued)*

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ [See attachment.](#)

18 Can any resulting loss be recognized? ▶ [See attachment.](#)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ [See attachment.](#)

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here Signature ▶  Date ▶ June 22, 2026

Print your name ▶ Timothy W. Wright Title ▶ CVP - Tax

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶	Firm's EIN ▶			
	Firm's address ▶	Phone no.			

FedEx Corporation

Distribution of FedEx Freight Holding Company, Inc. Common Stock Attachment to Form 8937

Part II

Line 14 – Describe the organizational action and, if applicable, the date of the action or the date against which shareholders’ ownership is measured for the action.

On June 1, 2026, FedEx Corporation (“FedEx”) distributed to holders of FedEx common stock, on a pro rata basis, 80.1% of the outstanding shares of FedEx Freight Holding Company, Inc. (“FedEx Freight”) common stock (the “Distribution”). Each FedEx shareholder received one share of FedEx Freight common stock for every two shares of FedEx common stock held on May 15, 2026, the record date for the Distribution. Fractional shares of FedEx Freight common stock that FedEx shareholders otherwise would have been entitled to receive in the Distribution were aggregated and sold in the public market by the distribution agent, and the aggregate net cash proceeds of these sales were distributed to those shareholders who would otherwise have been entitled to receive such fractional shares.

The information contained herein does not constitute tax advice and is not intended or written to be used for the purpose of avoiding penalties under the Internal Revenue Code. In addition, this information does not purport to be complete or to describe the consequences that may apply to particular categories of FedEx shareholders.

Shareholders are urged to consult their tax advisors regarding the particular consequences of the Distribution, including the applicability and effect of all U.S. federal, state and local, and foreign tax laws.

Line 15 – Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis.

The aggregate tax basis of your shares of FedEx common stock held immediately prior to the Distribution must be allocated between (i) the FedEx common stock you continued to hold immediately following the Distribution and (ii) the FedEx Freight common stock you received in the Distribution (including any fractional shares of FedEx Freight common stock you were treated as having received), in proportion to their relative fair market values.

Item 16 — Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of the securities and the valuation dates.

U.S. federal income tax laws do not specifically identify how to determine the fair market values of the FedEx common stock or the FedEx Freight common stock. One method for determining the fair market values is to use the volume-weighted average trading prices of the FedEx common stock and the FedEx Freight common stock on June 1, 2026. Using this method, the fair

market value of a share of FedEx common stock on June 1, 2026 was \$336.39 and the fair market value of a share of FedEx Freight common stock on June 1, 2026 was \$152.22. Based on these fair market values and the distribution ratio of one share of FedEx Freight common stock per two shares of FedEx common stock held, shareholders' pre-Distribution tax basis should be apportioned 81.55% to their FedEx common stock and 18.45% to their FedEx Freight common stock.

Item 17 — List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

The applicable Internal Revenue Code sections upon which the tax treatment is based are sections 355, 358 and 368.

Item 18 — Can any resulting loss be recognized?

FedEx intends for the Distribution, together with certain related transactions, to qualify as a "reorganization" under sections 355 and 368(a)(1)(D) of the Internal Revenue Code. Assuming that this characterization is respected, FedEx shareholders will not recognize any loss on the Distribution for U.S. federal income tax purposes (except to the extent that a loss may be recognized with respect to any cash received in lieu of fractional shares of FedEx Freight common stock).

Item 19 — Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Distribution occurred on June 1, 2026. As a result, the basis adjustments in the shares of FedEx common stock and FedEx Freight common stock should be reported in the taxable year that includes this date. In the case of shareholders who are calendar year taxpayers, the Distribution is reportable in the tax year ending December 31, 2026.