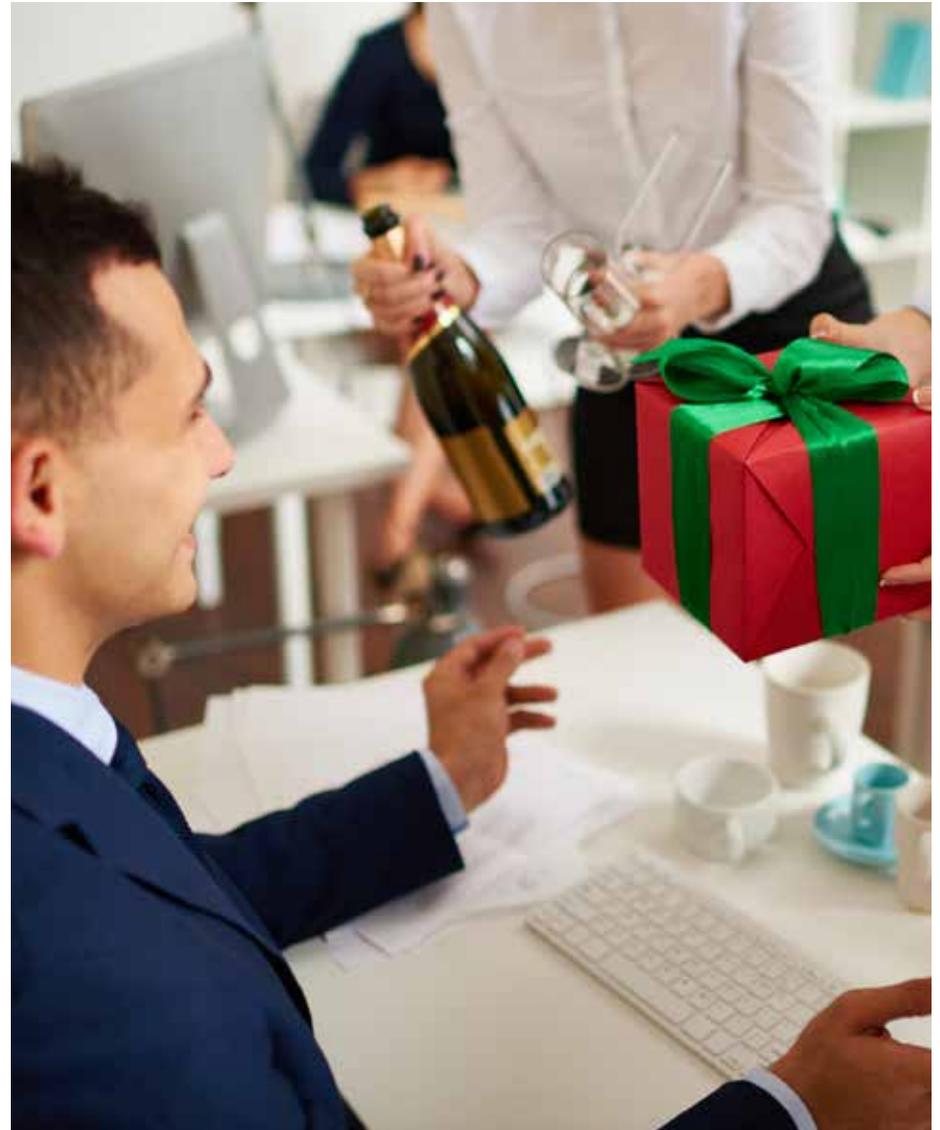




Global Gifts & Entertainment Policy

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Introduction

Policy Overview

This Global Gifts & Entertainment Policy reinforces our commitment to maintaining the highest standard of business and personal ethics as set forth in the [FedEx Code of Business Conduct and Ethics](#), and is designed to avoid even the appearance of wrongdoing.

This Policy applies to every employee of FedEx Corporation and its subsidiaries and affiliated companies. Please carefully review this Policy and contact your company's Legal Department with any questions.

For purposes of this Policy:

- The term "Third Parties" means customers, prospective customers, suppliers, prospective suppliers and any person with whom FedEx does or may do business; and
- The term "General Counsel" means the applicable FedEx company general counsel or senior legal officer (with respect to FedEx Express international, its Senior Vice President Legal) or his or her designee.

Please note that this Policy does not address offering gifts, meals or entertainment to government officials. Please refer to the [Governmental Contacts and Lobbying Disclosure Compliance Policy](#) regarding offering gifts, meals and entertainment to U.S. government officials, and the [Global Anti-Corruption Policy](#) regarding offering gifts, meals and entertainment to non-U.S. government officials.



Accepting Gifts, Meals & Entertainment from Third Parties

Accepting Gifts from Third Parties

- Gifts include (but are not limited to):
 - Tickets to sports, music or cultural events where FedEx employees and representatives of the Third Party providing the tickets do not attend the event together
 - Merchandise (for example, gift baskets, wine, clothing, mugs, pens, collectibles and hospitality bags)
 - Travel or lodging not associated with a business conference, meeting or event
 - Favorable terms or discounts on a product or service for the employee's benefit that are not otherwise available to all FedEx employees
- Subject to any local law restrictions, employees may accept nominal gifts with a combined market value of US\$75 or less from the same Third Party per year.
- Acceptance of individual gifts greater than US\$75, or multiple gifts in one year from the same Third Party totaling greater than US\$75, must be approved by your company's General Counsel.
- Gifts of cash or cash equivalents (such as gift cards, gift certificates or "red packets" commonly offered in Asia) must never be accepted.
- Employees may not solicit gifts from Third Parties.
- Please refer to the [Policy on Company-Provided Gifts and Awards for Employees](#) for guidance regarding accepting gifts from FedEx.

Q: A supplier has sent me an expensive gift basket for the holidays. I have never received a gift from this supplier before. Can I accept it?

A: You can accept the gift basket if it is valued at US\$75 or less. You should use your best judgment to estimate the value. If it is valued over US\$75, you will need to receive approval from your company's General Counsel in order to accept it.

Q: A customer was really happy with the service I provided. To thank me, she sent me an Amazon gift card for US\$50. Can I accept it?

A: A gift card that allows you to choose from a range of goods or services is considered a cash equivalent. Accepting gifts of cash or cash equivalents is strictly prohibited, regardless of the amount involved. You should politely return the gift card to the customer and explain that FedEx's policies do not allow you to accept it.

Accepting Meals & Entertainment from Third Parties

- Meals and entertainment include (but are not limited to):
 - Meals
 - Tickets to sports, music, or cultural events where FedEx employees and representatives of the Third Party providing the tickets attend the event together
 - Travel or lodging associated with attendance at a business conference, meeting or event
- Employees may accept meals or entertainment provided by Third Parties only if offered for legitimate business purposes and that complies with the following guidelines:
 - Is infrequent
 - Is not solicited
 - Is not given as a bribe, payoff or kickback
 - Does not create the appearance (or an implied obligation) that the provider is entitled to preferential treatment
 - Is in good taste and occurs at a business-appropriate venue
 - Is reasonable and appropriate in the context of the business occasion and your position at FedEx
- If the employee is the responsible manager or officer for the contract, FedEx is not and will not soon be in negotiations with the Third Party
- Complies with any specific FedEx operating company or work group limits

It is important to note that the purpose of this Policy is to prevent conflicts of interest with FedEx and to avoid situations that may be perceived by others as a potential conflict. Not only does this protect FedEx and our reputation for conducting business with integrity, but it also protects you and your personal integrity. While offers of nice meals or entertainment events can be attractive, careful consideration should be given to each of the above factors. If you are unsure of the reasonableness or appropriateness of, or whether you can attend, a particular meal or entertainment event, you should consult with your manager and, if appropriate, your company's General Counsel.

These guidelines apply to situations in which a representative of the Third Party providing the event tickets is present. Tickets to sporting, musical or cultural events provided to a FedEx employee where a representative of the Third Party providing the event ticket is not present are considered gifts and must comply with the guidelines set forth above (“Accepting Gifts from Third Parties”).

- If the event is business-related, a spouse or guest may accompany the employee for the purpose of assisting the employee with the business purpose of the event. Manager pre-approval is required before a spouse or guest may attend any such event.
- Lodging and travel for a business conference, meeting or event may not be accepted from a Third Party unless approved in advance by your company’s General Counsel.

Q: I was invited to a conference that is sponsored by a supplier. The supplier has offered to pay for all my travel expenses, including airfare, meals and accommodations? Can I accept this offer?

A: You may not accept the supplier’s offer to pay for travel and lodging without prior approval by your company’s General Counsel. You may accept meals from the supplier as long as they are not lavish or excessive and otherwise comply with the guidelines listed above.



Offering Gifts, Meals & Entertainment to Third Parties

- Please refer to the [Governmental Contacts and Lobbying Disclosure Compliance Policy](#) regarding offering gifts, meals and entertainment to U.S. Government Officials.
- Please refer to the [Global Anti-Corruption Policy](#) regarding offering gifts, meals and entertainment to non-U.S. Government Officials.
- In all other cases, employees may offer or provide gifts, meals or entertainment to Third Parties only for legitimate business purposes, provided that it complies with the following guidelines:
 - Is not given as a bribe, payoff or kickback
 - Does not create the appearance of impropriety
 - Is in good taste and occurs at a business-appropriate venue
 - Is reasonable and appropriate to the circumstances and your position at FedEx
 - Is properly documented in the company's books and records
- Gifts of cash or cash equivalents (gift cards or gift certificates) are never appropriate and may not be offered.

Q: The transportation manager for one of our large customers is getting married. I think we should send her a wedding gift. Is that ok?

A: As long as the gift is reasonable and appropriate and complies with all other guidelines above, it would be acceptable to provide this gift. You should not, however, offer any gift that may influence our customer's business judgment or create the appearance that it can be influenced.



Gifts to Fellow Team Members



- Employees may provide gifts (including gift cards) to fellow employees (including from managers to team members) as long as the gifts are in good taste, reasonable and appropriate, and paid for by the employee and not expensed to FedEx.
- Please note that personal gifts to employees should not be provided as performance awards. Performance awards should be provided to employees by FedEx under approved programs, such as the Bravo Zulu program, and must comply with the [Policy on Company-Provided Gifts and Awards for Employees](#).

Policy Compliance

Strict compliance with this Policy is required. All managers are responsible for enforcement of and compliance with this Policy, including its communication to their employees. Anyone who does not comply with this Policy shall be subject to disciplinary action, up to and including termination, to the extent permissible under local law.

If you have information about a possible violation of this Policy, contact your company's Legal Department or the FedEx Alert Line. Reports to the FedEx Alert Line may be made by calling a toll-free number or completing an online questionnaire. Within the U.S., you can reach the FedEx Alert Line at 1-866-42-FedEx (1-866-423-3339). International phone numbers and access to the online questionnaire can be found at www.fedexalertline.com.

Related Policies

- [Code of Business Conduct and Ethics](#)
- [Policy on Company-Provided Gifts and Awards to Employees](#)
- [Governmental Contacts and Lobbying Disclosure Compliance Policy](#)
- [Global Anti-Corruption Policy](#)
- Your company's Solicitation & Distribution Policy
- Your company's Charitable Contribution Policy

Anti-Retaliation Policy

FedEx prohibits any form of retaliation for reporting a suspected violation of this Policy in good faith.

Policy Custodian

Global Chief Compliance & Governance Officer

Adoption Date

This Policy was adopted effective November 23, 2015.

