



Global Antitrust &
Competition Law
Policy

Introduction

Policy Overview

FedEx thrives in competitive markets and we are committed to complying with all antitrust and competition laws applicable to our global business. These laws benefit customers by promoting lower prices, more choice and greater innovation. Actions that violate these laws, such as agreements among competitors to fix prices or divide customers, territories or markets, are prohibited and simply not the way FedEx does business.

Scope

This Policy applies to every officer, director, manager and employee (collectively “Team Member”) of FedEx Corporation and its subsidiary companies (“FedEx”). Every Team Member must comply with all applicable antitrust and competition laws. Penalties for violating these laws can be severe and include large financial penalties, loss of business opportunities, and even individual fines and prison sentences in some countries. In addition to penalties or fines, violations also can result in the loss of customer trust that can have significant and long-lasting impacts on our business.

Overview of Team Member Responsibilities

While antitrust and competition laws can be complex and their requirements can vary by country or territory, to help ensure compliance every Team Member must follow these core principles:

- Do not propose or enter into any formal or informal agreement, arrangement or understanding with any actual or potential FedEx competitor concerning prices, discounts, surcharges, sales promotions, bids, terms and conditions of sale or purchase, costs, profit margins, customers, territories or markets, market shares, wages, employee recruiting or hiring, business plans or strategies, boycotting or otherwise refusing to do business with any third party, or any other aspect of competition or our business.
- Keep confidential all FedEx commercially sensitive information and do not share such information with an actual or potential competitor either directly or indirectly through a third party, such as a common customer or supplier. This includes information related to the topics listed immediately above. If you receive such information from an actual or potential competitor (directly or indirectly), do not share or forward this information and

contact your company's Legal Department immediately.

- Do not propose or enter into any formal or informal agreement, arrangement or understanding that sets or controls the price at which a third party may resell a product or service without specific prior written approval from your company's Legal Department.
- Obtain written approval from your company's Legal Department before participating in any trade association (whether through formal membership, meeting attendance or otherwise) and avoid contacts with competitor employees at trade association or other events that could create an appearance of an improper agreement or inappropriate information exchange among competitors. Object immediately to any suggestion of an improper agreement or inappropriate information exchange among competitors and contact your company's Legal Department immediately.

Antitrust and Competition Law Guidelines

In addition to the core principles contained in this Policy, understand and follow any business specific guidelines on antitrust and competition law issued by the FedEx Legal Department.

Related Policies

- FedEx Code of Conduct

Policy Compliance

Strict compliance with this Policy is required. Compliance also includes timely completing any mandatory training and following any procedures that may be issued under this Policy. All members of management are responsible within their teams for enforcement and compliance with this Policy, including its communication to their Team Members. Any Team Member 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.

Reporting and Anti-Retaliation Policy

We encourage Team Members to speak up and report violations of this Policy. If you have information about a possible violation of this Policy, contact your management, your Legal or Human Resources department or the FedEx Alert Line.

Reports to the FedEx Alert Line may be made anonymously by calling a toll-free number or completing an online report form. 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 report form can be found at www.FedExAlertLine.com.

We prohibit retaliation against anyone who reports a known or suspected violation in good faith. We also prohibit retaliation against anyone who assists in an investigation. Any Team Member who is found to have retaliated against a person who has reported in good faith a violation, or assisted in an investigation, will be subject to discipline, up to and including termination to the extent permissible under local law.

Policy Custodian

Chief Compliance Officer

Adoption Date

This Policy was adopted May 15, 2013.

Last Amended June 1, 2020.