

Global Policy on Reporting Concerns

Policy Custodian: FedEx Chief Compliance Officer

Policy Adopted Effective: 1 May 2022

Policy Overview

At FedEx, we are committed to behaving ethically, with integrity, and in compliance with the law. Our fellow team members, customers, communities, and the marketplace expect nothing less of us. To help us maintain the highest standards of business ethics, it is important for our team members to speak up and raise questions and concerns about potential integrity, compliance, environmental, health, or safety issues. Unethical, illegal, unsafe, or other improper actions conflict with our core values and can harm our company, reputation, team members, and customers. When you speak up, you support our ethical culture and protect others by allowing FedEx to address the concern.

Scope

Overview

This Policy applies to every officer, director, and employee (collectively, "team member") of FedEx Corporation and its subsidiary companies throughout the world ("FedEx"). If you have questions about a situation not covered in this Policy, you should ask your manager or your Legal or Human Resources Department. Third parties (e.g., vendors/suppliers and their employees, stockholders, customers, and other non-team members) may also elect to use the reporting channels identified in this Policy to report concerns.

Local Policies and Procedures

Various countries have whistleblower laws that impose requirements on companies related to receiving and handling reports from employees or others about certain types of conduct.

We are committed to ensuring those who raise concerns covered under those laws have appropriate channels, adequate information on the topic, required data protection, and protection from retaliation. While this Policy provides globally applicable guidance on reporting concerns and non-retaliation, each FedEx Operating Company or International Region may also implement local policies or procedures to comply with local laws or to effectively implement this Policy.

Non-Retaliation

FedEx supports an environment where you can raise concerns without fear of retaliation and with confidence that the matter will be addressed. Every team member is responsible for reporting suspected misconduct. Reports received by FedEx are handled professionally, treated confidentially, and appropriately investigated.

FedEx prohibits retaliation against anyone who reports a known or suspected violation in good faith (you reasonably believe the violation is true when you report it). 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.

Reporting Concerns

What Should be Reported

You should report misconduct that violates the FedEx Code of Conduct, or any other unsafe, unethical, or unlawful behavior. Some examples of wrongdoing that require reporting under this Policy include bribery; corruption; conflicts of interest; environmental, health, and safety violations; and any other violations of FedEx policy or the FedEx Code of Conduct.

Reporting Issues Related to Financial Fraud, Accounting, or Auditing Matters

Any team member who learns of issues related to financial fraud or accounting, internal accounting controls, or auditing matters should always report these issues to the FedEx Alert Line or the FedEx Corporation General Counsel under the FedEx Policy on Treatment of Complaints Regarding Financial Fraud and Accounting and Auditing Matters.

When to Report a Concern

You should report a concern as soon as an issue is reasonably suspected or known. If you cannot report an issue when it is reasonably suspected or known, you should still make a report no matter how much time has passed.

How to Report a Concern

For team members, concerns may be reported to your manager; other members of FedEx management; the Human Resources, Security, Legal, or Corporate Integrity and Compliance departments; or the FedEx Alert Line. While we encourage concerns to first be raised with your manager, concerns can be raised through any of the available channels. Financial fraud, accounting, internal accounting controls, or auditing matters should always be reported through the FedEx Alert Line or to the FedEx Corporation General Counsel under the FedEx Policy on Treatment of Complaints Regarding Financial Fraud and Accounting and Auditing Matters.

Third parties who wish to report a concern should contact their FedEx business representative (for vendors/suppliers and customers), the Legal department, the Corporate Integrity and Compliance department, or the FedEx Alert Line.

What Happens After You Report a Concern?

Once received, reports undergo an initial assessment to determine whether an investigation is appropriate. If it is determined that an investigation is necessary, the investigation will be assigned to the appropriate FedEx team member(s) or third party to handle. The investigator may contact you for additional information and you are encouraged to cooperate with investigators to the fullest extent possible.

Available Reporting Channels

Open Door Policy

Your manager is typically in the best position to address your concerns; therefore, we encourage FedEx team members to contact their managers first. If you are not comfortable speaking with your manager about the issue or your manager is not available, we encourage you to utilize any of the other available channels for reporting.

FedEx expects managers and other leaders to keep an open door for team members to report concerns. Keeping an open door encourages open communication, trust, feedback, and discussion.

As a manager or leader, "having an open door" means you:

- Communicate to your team members that they can come to you with concerns.
- Are accessible and available.
- Listen attentively. Ask questions.
- Respect team members' concerns.
- Handle the concern or refer and track the issue as needed.

Human Resources, Legal, or Corporate Integrity and Compliance Department
If you prefer not to report a concern to your manager or another member of
management, you may also raise your concern to a member of the Human Resources or
Legal department, or to the Corporate Integrity and Compliance Department at
integrity@fedex.com.

Security Department

The FedEx Security Department is also an option for reporting certain issues, such as theft, workplace violence, and security/facility breaches. You should report workplace violence directly with Security using an online incident form at https://esims01.prod.cloud.fedex.com:8004/esims-webapp/wpvp. You can also email Security at asksecurity@corp.ds.fedex.com or call the Global Security Operations Team at 1-800-872-8025 or 901-922-1945. Team members can also report security concerns to local Security team members.

FedEx Alert Line

Concerns can also be reported to the FedEx Alert Line by calling a toll-free telephone number or by completing an online questionnaire. Both the telephone hotline and online reporting are available 24 hours a day, 7 days a week virtually anywhere in the world.

Based on variations in international law, reporting in some countries may be limited to only certain types of matters. If you cannot submit an Alert Line report based on these limitations, you can still report the concern to your manager or another member of management, the Human Resources or Legal Department, or the Corporate Integrity and Compliance Department.

You can reach the FedEx Alert Line in the United States at: 1-866-42-FedEx (1-866-423-3339). If you are outside the U.S., click here for phone numbers. Reports may also be made online at fedexalertline.com.

Anonymity, Confidentiality, and Privacy

The FedEx Alert Line allows for anonymous reporting (unless the laws of your country prohibit anonymous reporting) and you may request to remain anonymous when making reports through channels other than the Alert Line. FedEx strictly prohibits any attempt to discover the identity of reporters who request to remain anonymous. However, we encourage you to reveal your identity, as it is often difficult to investigate certain anonymous reports. Providing contact information also allows us to communicate with you directly about your report.

Reports will also be kept confidential, although FedEx may have to share the report with others to sufficiently investigate or address the concern.

In certain countries, FedEx may be required to inform the implicated person(s) when a complaint has been filed against them. However, we do not disclose your identity to the implicated party unless required by law to do so. Similarly, all persons involved in an investigation – even the implicated party – are entitled to confidentiality to protect their privacy, legal rights, and reputation.

FedEx is committed to protecting the privacy of everyone involved in a reported concern of misconduct, safeguarding personal data from unauthorized access or use, and complying with applicable data protection laws.

Related Policies

- Code of Conduct
- Policy on Treatment of Complaints Regarding Financial Fraud and Accounting and Auditing Matters
- Your Company's Whistleblowing Policy or Procedures
- Your Company's Open-Door Policy

Policy Compliance

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 managers are responsible within their teams for enforcement and compliance with this Policy, including its communication to their team members. Anyone who does not comply with this Policy shall be subject to disciplinary action, up to and including termination.