

## FedEx Supplier Code of Conduct

FedEx is committed to obeying the law and acting with integrity in everything we do, everywhere we do business. Our commitment to maintaining the highest ethical and professional standards is an integral part of our Purple Promise to make every FedEx experience outstanding. It has helped make FedEx one of the most admired companies in the world and one of Ethisphere's World's Most Ethical Companies for 2023.

This commitment to integrity and compliance is expressed in this Supplier Code of Conduct (the "Code"), which outlines the expectations and guidelines that FedEx has for all of its suppliers. We require all our suppliers to commit to principles and standards similar to those outlined below.<sup>1</sup>

FedEx also expects its suppliers to abide by all applicable national, state and local laws and regulations. Where local laws or standards differ from this Code, we expect suppliers to commit to the more stringent standards and principles.

### Health and Safety

FedEx is committed to maintaining a healthy and safe workplace. We must comply with applicable health and safety laws and policies and prevent unsafe working conditions. This includes maintaining an alcohol-free and drug-free workplace in accordance with FedEx policies and national, state and local laws.

### Workplace Security

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

### Equal Opportunity and Anti-Harassment

FedEx is committed to equal opportunity, fairness, respect, and inclusion. We 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

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<sup>1</sup> The FedEx Supplier Code of Conduct (the "Code") does not apply to companies or their personnel providing services under an Independent Service Provider or Transportation Service Provider Agreement. These Agreements set forth separate contract terms regarding honesty and integrity, safe operating practices, security, anti-harassment, anti-bribery/corruption, human trafficking, conflicts of interest, confidential information, and compliance with applicable laws. Further, certain FedEx supplier contracts may contain specific provisions regarding topics addressed in the Code. This Code is not intended to supersede any provisions in a supplier contract. If there is any inconsistency between specific contract provisions and the Code, the provisions of the contract will control.

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 suppliers with physical and mental disabilities unless such accommodation imposes an undue hardship on our business.

We prohibit sexual harassment.

### **Human Rights and Human Trafficking**

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.

### **Conflicts of Interest**

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.

### **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 a contract with FedEx.

### **Data Security and Privacy**

We are committed to maintaining the security and privacy of personal data provided to FedEx by team members, customers, suppliers 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 suppliers 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 suppliers is prohibited.

### **Accurate Recordkeeping**

We are committed to maintaining records to meet our financial, legal and operational requirements. Many suppliers are involved with FedEx records such as time sheets, expense reports, hours-of-service logs or customer transactions. In addition, some suppliers 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.

### **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 also committed to continual improvement in environmental management.

### **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 supplier. 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.

### **International Trade Controls**

FedEx is headquartered in the U.S., and we are committed to complying with the trade control laws and regulations of the U.S. and the other countries in which we operate. 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. or other relevant trade sanctions

- Screen transactions to avoid doing prohibited business with persons or entities on restricted or denied parties lists
- Do not deliver shipments that are prohibited for import or export
- Do not transfer controlled technology, equipment or software without required import or export authorization

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.

### **FedEx Alert Line and Contacting Us**

If you have a concern related to FedEx, we encourage you to first discuss it with your FedEx business contact. If 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](https://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).

If you have any questions about the Code, please contact the Corporate Integrity & Compliance Department at [integrity@fedex.com](mailto:integrity@fedex.com).