



VIGILANCE PLAN 2020

FEDEX EXPRESS FR

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1. INTRODUCTION

1.1 Reminder of the legal obligations

In accordance with French law No. 2017-399 of March 27 of 2017, on the duty of vigilance of parent and instructing companies (hereinafter the “Duty of Vigilance Act”), large companies are required to formalize a transparent, exhaustive and sincere vigilance plan.

This document should be used to identify and prevent risks related to the company’s activity and supply chain in three categories: the health and safety of individuals, human rights and fundamental freedoms, and the environment.

This law has passed in the aftermath of several major accidents affecting the supply chains of international companies, including the collapse of Rana Plaza, a textile factory in Bangladesh, which killed several hundred workers. These accidents occurred following proven cases of non-respect for fundamental rights and freedoms, human health and safety and / or the environment among subcontractors and suppliers of large French companies.

The legal entity FedEx Express FR, a FedEx Express Group’s subsidiary, has more than 6,000 employees in France and, as such, is subject to the law.

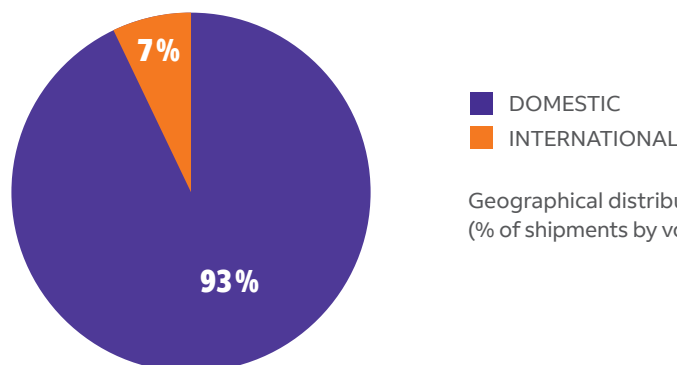
The vigilance plan must be included in the management report or the Universal Registration Document (URD) and must also be accessible and made public in a visible and downloadable form on the Group’s various websites. It must be updated annually.

This plan has been structured around the main elements expected in a vigilance plan, as indicated in the regulations.

1.2 Presentation of FedEx Express FR’s activity

FedEx Express FR is a French legal entity attached to the FedEx Express Group, present in more than 220 countries and territories.

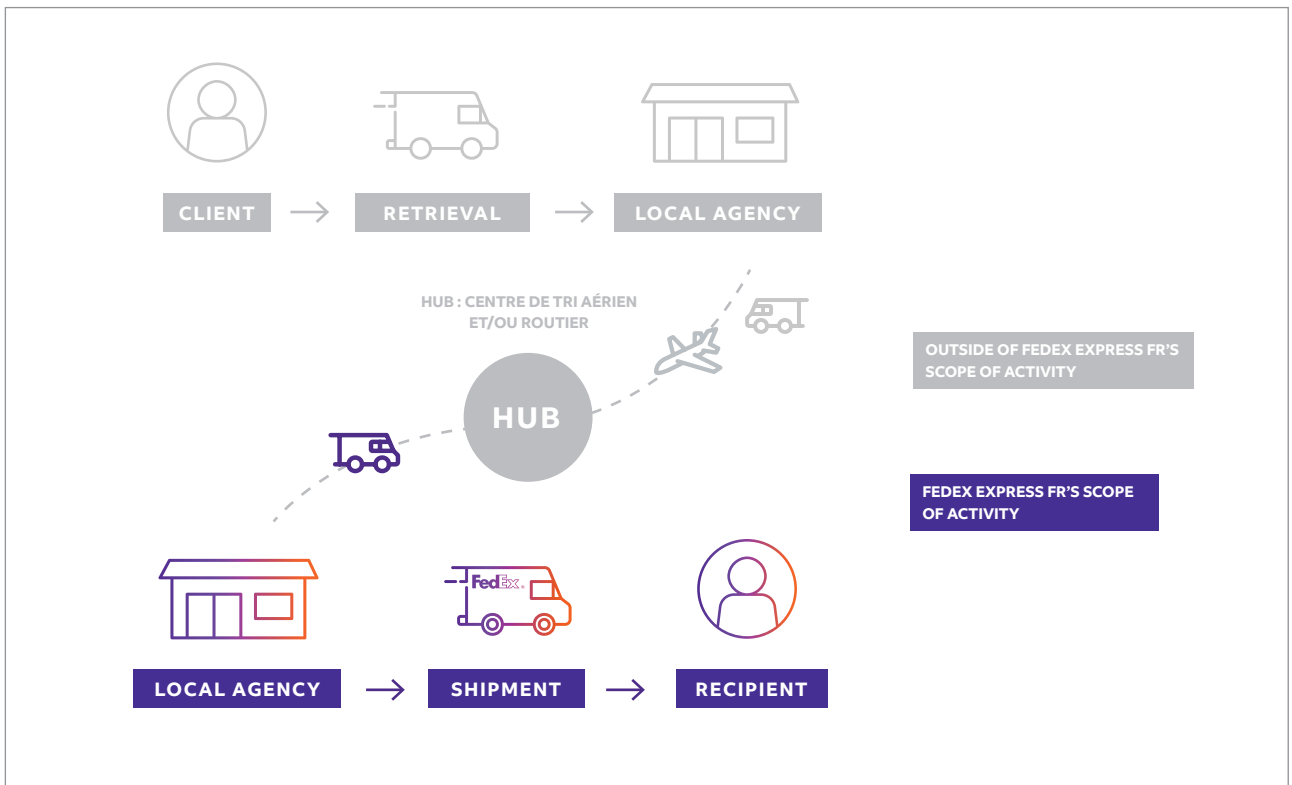
Its main activity consists of shipping and delivery services, mainly in France (93% of shipments) and abroad (7% of shipments).



Geographical distribution of FedEx Express FR’s activities (% of shipments by volume between June and November 2020).

The company manages **domestic road transport activities** (since July 1, 2020, it no longer manages any domestic air transport) and uses a network of FedEx partners for transport outside the national perimeter.

The FedEx Express FR network consists of **145 agencies**⁽¹⁾ across France and **two road hubs** in Lieusaint and Marly-La-Ville, which are hubs for deliveries in mainland France and Europe.



Presentation of FedEx Express FR's main activities.

Also present on the French territory, the Roissy-Charles de Gaulle air hub is the entry and exit point for the majority of European and international parcels. It is directly managed by Federal Express Corporation (FRT), which is the French branch of the American company headquartered in Memphis. FRT is a separate legal entity from FedEx Express FR.

In subsequent parts of this report, agencies and hubs will be referred to as “sites”.

(1) Data as of 01/06/2021

1.3 Scope of application of the vigilance plan

Scope covered by this vigilance plan

The risk mapping and the associated vigilance plan cover :

- **In terms of activity:** All shipments managed by FedEx Express FR on the French territory are taken into account within the scope of this vigilance plan.
- **In terms of stakeholders in the FedEx Express FR value chain:**
 - Subcontractors (accounting for more than half of operating costs)
 - FedEx Express FR employees
 - Temporary workers
- **In terms of purchases:** FedEx Express FR's purchase categories representing an annual amount greater than or equal to €8,500,000, covering 84% of the company's purchases.

Transport subcontracting and temping represent the first two categories of purchases, and contribute to a significant portion of the company's operating costs.

For this exercise, these stakeholders have been considered both as suppliers to the company, and as persons exposed to the same risks as FedEx Express FR employees in the performance of their duties.

Scope not covered by this vigilance plan

- **The management of international shipments** out of France has not been included in the vigilance plan at this stage as, in addition to the small proportion of shipments represented (7%), they are mostly handled by "partner" entities of FedEx Express FR (see section 1.2).
- Since it is administered by FRT, the French branch of the American company Federal Express Corporation, which has fewer than 5,000 employees and is therefore not subject to the duty of vigilance regulations, **the activities of the Paris-CDG Hub will not be covered by this plan.** Nevertheless, the staff attached to FedEx Express FR who work on this hub are taken into account in the risk mapping.
- **Purchasing categories below €8,500,000**, that do not represent a significant risk, as identified in the workshop.
- **Second-tier and above suppliers** are not covered by this vigilance plan.

THE SCOPE OF THE FEDEX EXPRESS FR VIGILANCE PLAN IN SUMMARY

Risk mapping and the associated vigilance plan therefore cover:

- Transport and logistics activities carried out by FedEx Express FR in France, representing nearly 93% of shipments managed by the company
- The stakeholders mobilized by the company's activity (employees, temporary workers and subcontractors) in these activities
- The company's main purchasing items (84% of purchases made by FedEx Express FR)

1.4 Presentation of the methodology

Measures implemented

The implementation of this vigilance plan was supervised by the **HSE department** of FedEx Express FR, with the support of a **dedicated steering committee** comprising the company's main business lines: Operations, Legal, Purchasing, Human Resources and Marketing.

Members of Employee Representative bodies also participated in the implementation of this monitoring plan.

The company commissioned an **external consulting firm specializing in Corporate Social Responsibility** to formalize this first vigilance plan. It will be referred to as the "consulting firm" in the rest of the document.

Main stages of realization

The definition of the vigilance plan was carried out according to the following steps:

- **Identification of the main risks for the company on the basis of international guidelines** (UN Guiding Principles on Human Rights Reporting, Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, etc.), **sources specific to transport and logistics activities** (recommendations of the International Council on Clean Transportation, etc.) and **individual interviews with around ten FedEx employees representative of the company's various activities** as well as with **stakeholders in the value chain** (suppliers, temporary employment agencies, etc.). FedEx's **Employee Representative bodies** were also questioned during two workshops aimed at clarifying and completing the qualification of risks and collecting their suggestions for action.
- **Risk prioritization** (severity and probability criteria) internally (prioritization workshop bringing together more than ten key functions in the company) and externally (rating by the external consulting firm).
- **Definition of dedicated action plans to mitigate or prevent the main risks**, during three cross-functional workshops, based on existing internal processes and approaches, as well as governance and related assessment procedures.
- **Disclosure of a first version of the vigilance plan to employee representatives.**
- Finalization of the vigilance plan.

A FRENCH VIGILANCE PLAN IN LINE WITH THE FEDEX GROUP'S CSR APPROACH

Since FedEx Express FR is part of the FedEx Group, the vigilance plan was defined in close connection to the Group's risk analysis and CSR commitments.

The Group's CSR strategy is based on three pillars:

- Economic growth and innovation: "Multiplying Growth"
- The Human: "Multiplying Potential"
- The Environment: "Multiplying Efficiencies"

These are complemented by two transversal axes:

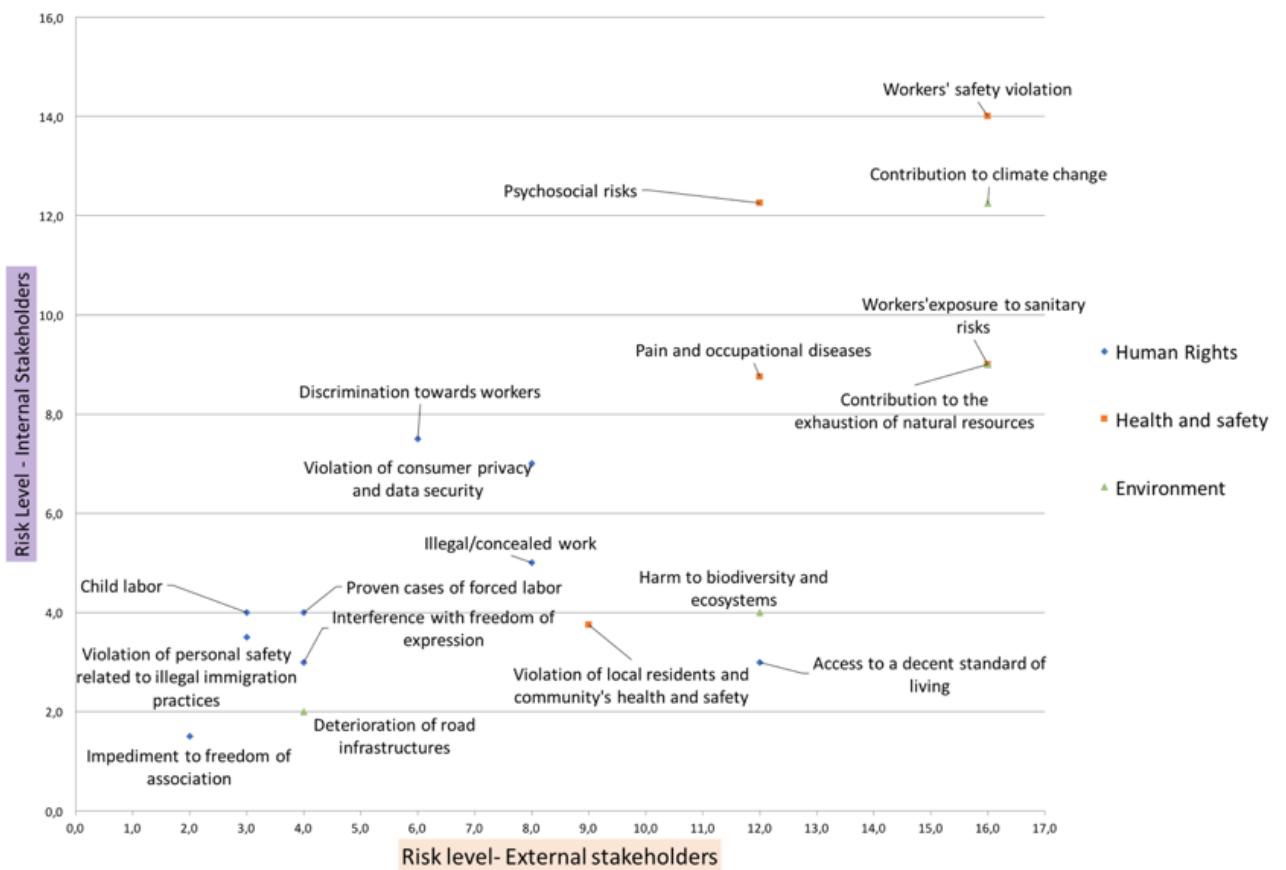
- "FedEx Cares: Community", which encompasses societal commitments (financial or skills sponsorship, support for local authorities, etc.).
- "Corporate Integrity and Compliance", which includes policies and means implemented to ensure business ethics, the fight against corruption, harassment, discrimination and modern-day slavery, and data protection.

A **concordance table** between the risks identified in the vigilance plan and the Group CSR strategy makes it possible to identify the risks addressed (totally or partially) within the framework of the CSR initiatives, and to use them to strengthen risk prevention and mitigation actions at the level of FedEx Express FR. The steps taken at the European level (e.g. structuring a responsible purchasing policy and supplier audits) were also integrated into the documentary analysis carried out prior to the structuring of the plan.

For further information: the FedEx Group's CSR approach and commitments are available online at this link: https://sustainability.fedex.com/FedEx_2020_Global_Citizenship_Report.pdf

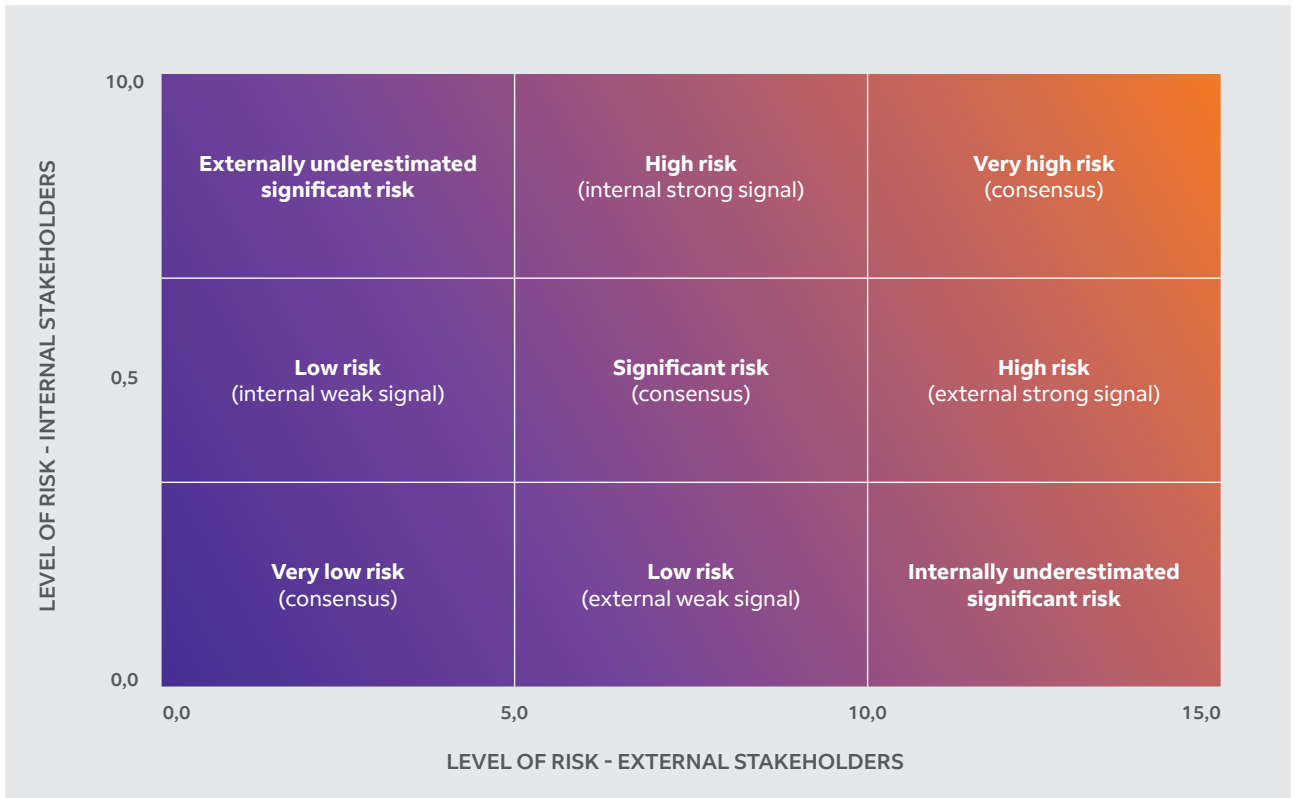
2. RISK MAPPING

The results of the prioritization workshop and the external rating made it possible to position each risk in the graph below, according to its internal and external rating.



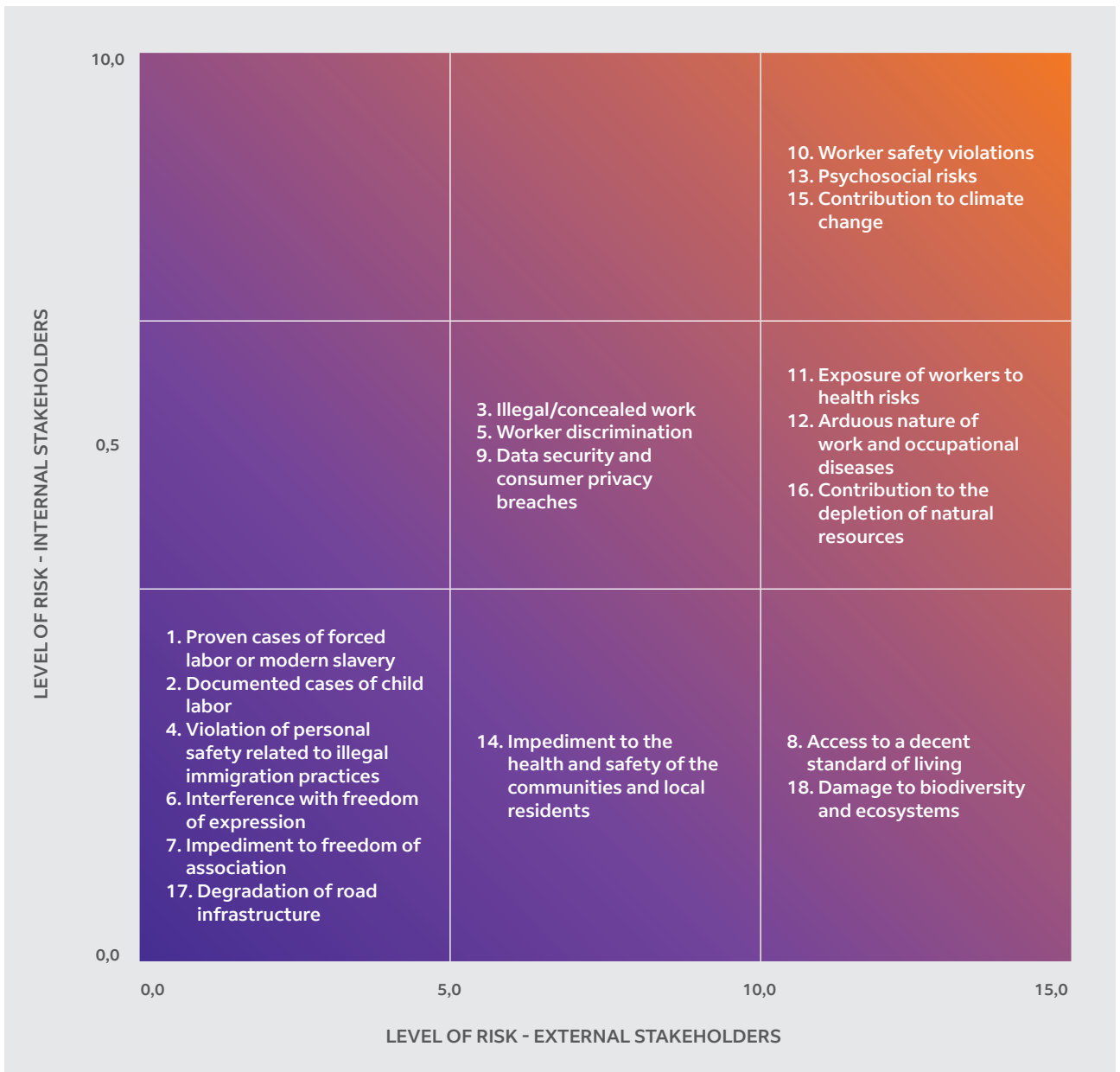
Matrix of risk distribution according to established probability x severity scores established by external (x-axis) and internal (y-axis) stakeholders.

The prioritization matrix below was then used to classify the risks into four categories: very high, high, low and very low risk.



Prioritization matrix used to classify risks by level of importance.

This first vigilance plan will address “very significant” and “significant” risks, i.e. 11 risks to be addressed as a priority, divided into the three categories of “Health and Safety”, “Environment” and “Human Rights and Fundamental Freedoms”.



Classification of risks identified for FedEx Express FR by level of importance.

This first vigilance plan will address “very significant” and “significant” risks, i.e. 11 risks to be addressed as a priority, divided into the three categories of “Health and Safety”, “Environment” and “Human Rights and Fundamental Freedoms”.

2.1 Priority health and safety risks

One of the company's main issues is the risk of compromising the health and safety of workers throughout the value chain. Inherently linked to the sector's activities (transportation and handling), these risks are particularly related to:

- **The infringement of workers' safety in connection with working conditions** on logistics activities (falls, carrying loads, etc.) and transport (road accidents) and related to night work.
- **Health risks related to working conditions**, especially contact risk when transporting and handling hazardous materials. The health risk also covers the risk of epidemics.
- **The arduousness and development of occupational illnesses** (musculoskeletal disorders, for example) related to certain jobs or work rhythms (night work, load handling, driving, sedentary lifestyle, etc.).
- **Psychosocial risks** related to the company's activity (stress related to work rhythms and the challenges of punctuality, degraded interpersonal relationship, loneliness, risks of theft and robbery, harassment, aggression, etc.) and the current context of economic uncertainty related to the health crisis on the one hand, and the transformation of FedEx Express FR on the other hand (merger of former entities, reorganization).

2.2 Priority risks related to the violation of human rights and fundamental freedoms

The main human rights risks within FedEx Express FR are notably associated with specific features of its value chain and particularly the significant use of subcontractors and temporary workers:

- **Concealed work**, particularly within subcontracting companies, over whose practices FedEx has more limited control. However, since the majority of subcontracting is carried out with French companies, the probability of this risk materializing remains lower than in other countries.
- **Discrimination** related to the social or ethnic origin, age, disability, gender, sexual or political orientation of employees, in a context of true social and cultural diversity of the teams.
- **Access to a decent standard of living** (remuneration, right to housing in large cities in particular, etc.) mainly in relation to salaried or temporary workers on short or part-time contracts.
- **Data protection**, in relation to the risks of invasion of privacy of customers and employees and the confidentiality of their personal data. Sensitive risk linked to the transport activity (volumes of sensitive customer data) in a risk factor context (use of new interconnectivity technologies accelerated by the health crisis, increasingly frequent cyber-attacks, etc.).

2.3 Priority environmental risks

Given its importance in the share of greenhouse gas emissions and fossil energy consumption, the activities of the transport sector, and therefore of FedEx Express FR, present a series of risks for the environment :

- **Contribution to climate change:** The transportation sector is currently the largest emitter of greenhouse gases in France (30% of national emissions in 2018⁽²⁾). The environmental, but also social and societal impacts of climate change are significant and manifold.
- **Contribution to the depletion of natural resources:** Transportation accounts for nearly 32% (2018 data⁽³⁾) of final energy consumption in France. This consumption is mainly carried out by oil products for road transport. FedEx Express FR's activity is currently based mainly on the use of non-renewable energy (fossil fuels). This risk is closely related to the previous one – the monitoring and prevention measures of one helping to mitigate the other.
- **Damage to biodiversity and ecosystems:** This refers to the risks of damage to the health of natural ecosystems and the alteration of domestic or wild species related to the company's logistics activities (artificialization of soil during the construction of new sites, etc.) and transport (noise, air, water, soil pollution, etc.).

(2) Source: Monitoring of the French National Low Carbon Strategy

(3) Source: French General Commission for Sustainable Development

3. EXISTING APPROACHES AND RISK MITIGATION AND PREVENTION ACTION PLAN

To reinforce the integration of these themes in its strategy, FedEx Express FR has drawn up a roadmap broken down into three priority areas of action identified from this analysis.

1	Consolidating a holistic approach of Health and Safety	<ul style="list-style-type: none"> • Ensuring worker safety • Prevention of health risks • Prevention of arduousness • Prevention of psychosocial risks
2	Guaranteeing human rights throughout the value chain	<ul style="list-style-type: none"> • Fight against illegal & concealed work (subcontractors) • Fight against discrimination (transversal) • Access to a decent standard of living (transversal) • Data protection (customers)
3	Structuring a national dynamic on environmental issues	<ul style="list-style-type: none"> • Fight against climate change • Reduction in the consumption of natural resources • Preservation of biodiversity & ecosystems

Priority fields of action identified by FedEx Express FR following the risk analysis.

POINT OF ATTENTION

In the context of the recent merger of entities with their own procedures and preventive actions, a certain number of actions planned for 2021 and 2022 are part of the standardization and deployment of existing approaches to all entities.

3.1 Consolidating a holistic approach to health and safety

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
Governance and transversal procedures	HSE manual defining guidelines to be followed in all countries in which FedEx operates, in terms of health, safety (including the transport of hazardous materials). Currently being rolled out, its application will be audited in 2022	FedEx Group	Transposition and distribution in France of the Group's HSE manual (FY22 ⁽⁴⁾)
	Management and steering committee dedicated to Health, Safety and the Environment	FedEx Express FR	Training of 100% of the plant managers in risk management, including environmental risks (FY22)
	"Manager facing risks" training programs covering safety, environmental risks, psychosocial risks, and risks inherent to coactivity (suppliers, subcontractors)	FedEx Express FR Facilities	
	Monthly follow-up and analysis of the accidentology	Employees, temporary workers (monitored by temporary employment agencies) and FedEx Express FR subcontractors	Updating and deployment of the monthly accidentology monitoring tool to all ex-entity perimeters and subcontractors (FY22)
	Pre-referencing questionnaire and annual performance review integrating Health and Safety criteria	Suppliers and subcontractors ⁽⁵⁾	The procedures for evaluating subcontractors and suppliers and the related action plan are detailed in part 4 of this document.

(4) FY = Fiscal Year, corresponding to a year beginning June 1 in year n-1 and ending May 31 in year n. For example, FY22 means "from 06/01/2021 to 05/31/2022".

(5) Suppliers and subcontractors providing > 400 hours of service per year.

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
Site safety	OHSAS 18 001 ⁽⁶⁾ certifications	60% of FedEx Express FR	<p>Generalization of HSE performance reviews to all sites (FY22)</p> <p>Redesign, modernization and deployment of the New Arrivals Welcome Center (employees and temporary workers) (FY22)</p> <p>Generalization of security “talks” to all sites (FY22)</p>
	Health, Safety and Environment (HSE) performance reviews carried out by managers with center managers	FedEx Express FR sites	
	Safety welcome booklet, support for safety and security training for newcomers	Salaried and temporary workers on FedEx sites	
	“Causeries” (awareness-raising exercises and exchanges on security risks) implemented in a few regions	FedEx Express FR sites	
	Bi-annual steering committee dedicated to monitoring and accidentology in liaison with the temporary employment agencies	Temporary workers	
Road safety	Measurement of driving and resting times with warning device	Employed FedEx Express FR drivers	<p>Redesign of road safety & eco-driving training (FY22) & deployment among employees (FY23)</p>
	Mandatory follow-up, analysis, accident sharing and corrective action plan	Subcontracted FedEx Express FR drivers	

(6) The British OHSAS 18 001 standard was an occupational health and safety management system. For a long time, it was the only standard dealing with this issue and is now gradually being replaced by the international ISO 45001 standard created in 2018. This certification, according to OHSAS 18001 standard is subject to an audit by an approved body.

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
Prevention of health risk	Dedicated team and training module on hazardous materials	Salaried and temporary FedEx Express FR workers	Continuation of the structuring of procedures for the prevention and monitoring of epidemic and pandemic health risks, beyond Covid-19 (FY21)
	Sworn statement of training subcontracted employees in the transport of hazardous materials.	FedEx Express FR subcontractors	
	Specific prevention and monitoring procedures implemented to fight Covid-19	FedEx Express FR	
Prevention of the arduous nature of work and occupational diseases	Annual training "Gestures and Postures"	Salaried workers on FedEx Express FR sites	Renewal and deployment of the "Gestures and postures" training to all handling employees (FY22) Systematize the <i>Safety in Design</i> procedure before, during and after the implementation of new projects (FY22)
	"Safety in Design" procedure: audit grid deployed since 2018 by the FedEx Group (international scale) that can be completed for any new project impacting working conditions	FedEx Group	
	Ergonomic and noise studies carried out at regular intervals by independent service providers	FedEx Express FR sites	
Prevention of psychosocial risks	Prevention procedure hosted by an external platform (Stimulus) making it possible to contact, anonymously and free of charge, registered psychologists and including trainings to better manage stress situations	Salaried and temporary FedEx Express FR workers	Reinforcement of the psychological unit provided by Stimulus during the Company's transformation project (outsourced sessions with clinical psychologists) (FY21 and FY22)
	The "manager facing risks" training programs include a day dedicated to psychosocial risks	FedEx Express FR platforms and hubs	
	Annual Satisfaction Barometer (SFA)	European FedEx employees	

3.2 Ensuring human rights throughout the value chain

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
Fight against undeclared work	Procedures for checking legal documents with subcontractors and suppliers at beginning and during the course of the relationship	FedEx Express FR	The procedures for evaluating subcontractors and suppliers and the related action plan are detailed in part 4 of this document.
Fight against discrimination, in favour of inclusion and diversity	Code of Conduct and Ethics specifying the principles of equal opportunity and the fight against harassment and discrimination.	FedEx Express FR	<p>Creation of a “Diversity” committee at the European level, guaranteeing the inclusion policy and the deployment of actions (FY22)</p> <p>Participation in recruitment forums for people with disabilities (FY22)</p> <p>Implementation and deployment of personalized support for workers in situation of incapability (FY22)</p> <p>Facilitating scheduling for family caregivers (FY23)</p>
	Contractual terms on non-discrimination	Suppliers	
	<p>Company agreement and action plan on disability. Example of measures already in place:</p> <ul style="list-style-type: none"> • Setting up a network of regional disability correspondents in charge of applying and deploying the disability action plan • Awareness brochure systematically attached to contracts, along with the health and safety welcome booklet • Training for members of the CSSCT (Commission Santé, Sécurité et Conditions de Travail) and HR teams • Awareness-raising events held during European Disability Employment Week 	FedEx Express FR	

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
<p>Contribution to a decent standard of living</p>	<p>Housing Commission dedicated to facilitating access to housing for employees</p>	<p>FedEx Express FR</p>	<p>Consolidate the functioning of the Housing Commission (FY21)</p> <p>Make job vacancies more visible on the site to facilitate internal promotion of employees, by capitalizing on the advantages of the new human resources management software, WorkDay, which offers all employees IT tools that make it possible to consult vacancies available in all former entities, thus improving visibility. On-site posting and reminders by local management will also be provided (FY21)</p>
	<p>Priority clause in the contract for part-time employees to facilitate access to full-time positions</p>		<p>Study, in conjunction with service providers, the feasibility of encouraging office and site maintenance workers to work during the day rather than late at night or early in the morning - with the advantage for the workers of being more compatible with a personal life, another job or public transportation schedules (FY22)</p>

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
<p>Data protection policy</p>	<p>“InfoSec” computer security training</p>	<p>FedEx Express’ employees</p>	<p>Implement an online training course on personal data protection and information security (will complement the existing “InfoSec” training). This training would be taken annually by managers, supervisors, and employees in “professional” positions (specialists, analysts, and consultants) (FY21)</p>
	<p>General Group policy relating to the protection of personal data and data accessible on the intranet called “Global privacy policy”</p> <p>Binding corporate rules: document dealing with the intra-group processing of customer, provider and other third-party data. Documents accessible from the FedEx and TNT public websites</p> <p>“Privacy day” is an annual event organized by the Group for FedEx employees, dedicated to the protection of personal data. In 2021, webcasts were facilitated by in-house experts to raise employee awareness on the main issues regarding personal data protection and information security.</p> <p>The Company’s Code of Conduct applies to all Group employees and, contains a section on personal data protection.</p>	<p>FedEx Group</p>	
	<p>Human Resources privacy policy available on the Group’s intranet.</p> <p>E-mail address available for employees to request access to their personal data. This address is specified in the aforementioned policy.</p>	<p>FedEx Express’ employees</p>	
	<p>Reinforce employee and job applicants’ information regarding the processing of their data thanks to an information notice specific to France (FY22)</p>		

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
Data protection policy	<p>Information clause inserted in customer, supplier and subcontractor contracts and in the GCS.</p> <p>Data security commitment clause inserted in supplier and subcontractor contracts.</p> <p>Privacy and cookie policy available on the websites.</p> <p>E-mail address open to customers and recipients to formulate a request to access their personal data. Address mentioned in the aforementioned policies and General Terms and Conditions (GTC) and recalled in the Company's marketing communications</p>	<p>FedEx Express FR clients, suppliers and subcontractors</p>	<p>Strengthen the communication of the remittences recipients by inserting an information clause on the labels stuck on parcels (FY22)</p>
	<p>Displays on sites that inform about the presence of CCTV cameras</p>	<p>FedEx Express FR</p>	<p>Add detailed information regarding the processing of data collected by video surveillance on billboards in the sites concerned (FY21)</p>

3.3 Structuring a dynamic on environmental issues

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
<p>Transversal</p>	<p>ISO 14001 certification⁽⁷⁾</p>	<p>60% of FedEx Express FR sites</p>	<p>Deployment of ISO 14001 certification on 60% of sites and 100% of road hubs (FY22), 80% of sites (FY24) and 100% of sites (FY27)</p>
	<p>Realization & publication of an energy audit</p>	<p>FedEx Express FR road transport activity (including subcontractors), some sites</p>	
<p>Contribution to the fight against climate change</p>	<p>Assessment of greenhouse gas emissions on Scopes 1, 2 and 3</p>	<p>FedEx Express FR</p>	<p>Subscription to the “CO₂ objective” charter including subcontractors (FY22) and then to the “CO₂ objective” label (FY24)</p> <p>Design (FY22) and deploy (FY23) a new eco-driving training course for all employees</p> <p>Realization of an optimization study (Road-Design) of rounds, collections and fill rate (limitation of systematic removals, monitoring of empty runs etc.) (FY22)</p> <p>As part of the <i>City Logistics project</i>, deployment of transport tests by scooters and electric vehicles in eight cities in France (FY23)</p> <p>Proposal & negotiation of a teleworking agreement (FY22)</p>

(7) The international ISO 14001 standard defines rules for integrating environmental concerns into the activities of companies and organizations that adhere to it. It covers the environmental aspects related to the company’s activities, products and services. Certification according to this ISO 14001 standard is obtained following an audit carried out by an independent accredited body.

FIELD OF ACTION	EXISTING MONITORING OR PREVENTION APPROACHES	SCOPE OF APPLICATION	COMMITMENTS AND ACTION PLAN
Reduce the consumption of natural resources	Regulatory energy audit of warehouses	FedEx Express FR sites	Implementation of a monthly consolidated monitoring of energy and water consumption in all sites (FY22) Deployment of BREEAM ⁽⁸⁾ certification to all new sites built from 2021 (from FY21 onwards)
	Recycling of cardboard and plastic packaging waste at the majority of sites.		
Contribution to biodiversity and the protection of ecosystems	Management of hazardous products and prevention of pollution.		

(8) The BREEAM (“Building Research Establishment Environmental Assessment Method”) is a standard for the environmental certification of buildings. It is the British equivalent of the HQE (High Environmental Quality) standard in France, and includes ten criteria assessing the building’s impact on the environment: Management, Innovation, Well-being and Health, Pollution, Water, Materials, Transport, Landscape and Ecology, Waste, Energy.

4. SUBCONTRACTOR AND SUPPLIER EVALUATION PROCEDURES

4.1 Description of suppliers and subcontractors

Subcontracting

FedEx Express FR mainly uses subcontractors for its transport activity. These are divided into two categories:

- Subcontracting for short-distance road transport (such as urban transport, last-mile logistics) – called “Pick Up and Delivery” (PUD), accounting for 41% of FedEx Express FR’s annual spending.
- Subcontracting for long-distance road transport “Shuttle Linehaul”, accounting for 10% of FedEx Express FR’s annual expenditure.

Representing more than half of the annual expenditure, transport subcontracting is FedEx Express FR’s largest purchasing item. Due to its importance and the specific terms of this type of contract, an action plan specifically dedicated to subcontracting has been designed.

Suppliers

The other suppliers of FedEx Express FR are mainly service providers: interim on sites, security, maintenance, administrative and IT support⁽⁹⁾.

(9) Details of the categories are available on page 4 of this document.

4.2 Existing evaluation procedures of suppliers and action plan

CATEGORY CONCERNED	EXISTING EVALUATION PROCEDURES	COMMITMENTS AND ACTION PLAN
<p>Suppliers</p>	<p>Upstream of the relationship, the following are integrated into the consultation file: the formalized CSR policy pillars, information on revenues to avoid dependency, commitment of compliance with the principles of the 1948 Universal Declaration of Human Rights, the principles and regulations of the labor code, and respect for the human person.</p> <p>When contracting: questionnaire to be completed by the supplier, including questions on: its ISO 9001, 14001, OHSAS 18001 certifications, the presence or absence of an HSE policy, a workplace prevention and protection service, a plan or program for monitoring health and safety indicators, a code of conduct and ethics, commitments in terms of information security and protection of personal data.</p> <p>During the contract period: Annual performance review for major suppliers⁽¹⁰⁾ and subcontractors integrating the review of items and KPIs requested at the time of contracting</p> <p>A mapping of “purchasing” risks (essentially covering legal and business risks) has been drawn up</p>	<p>For purchases decided at the level of FedEx Express FR:</p> <ul style="list-style-type: none"> • Complete the mapping of purchasing risks with the ones identified as part of the duty of care (FY22) • Reinforce CSR obligations on high-risk purchasing categories (temporary workers, call centers, etc.) (FY22) <p>For purchases of FedEx Express FR decided at European level:</p> <ul style="list-style-type: none"> • List the risk categories for which it would be appropriate to implement a CSR approach (FY22) • Initiate or strengthen CSR initiatives for the purchasing categories concerned: calls for tenders, contractualization, etc. (FY23)
<p>Interim</p>	<p>Monthly monitoring of accidentology indicators for temporary workers, carried out by temporary employment agencies</p>	

(10) Representing expenses of more than €100,000/year for the company.

4.3 Risks specific to subcontractors, existing procedures, and action plan

Risks specific to subcontractors

Main risks related to the outsourcing of the transport activity and on which FedEx Express FR must pay particular attention:

- Risks related to road accidents
- Risks due to the arduous nature of work and occupational diseases related to night work
- Health risks related to the transport of dangerous goods
- Psychosocial risks related in particular to the stress inherent to the express transport sector, loneliness, etc.
- Risk of hidden work
- Contribution to climate change

Other risks (discrimination, job insecurity, threats to the availability of natural resources, protection of biodiversity) have been ruled out because FedEx Express FR's level of control and room for maneuver over these risks is strongly constrained by the nature of the subcontracting contract.

Existing procedures and action plan

RISK	EXISTING EVALUATION PROCEDURES	COMMITMENTS AND ACTION PLAN
Risks related to road accidents	Monthly monitoring and analysis of subcontractors' accidentology, mandatory action plan	
Risk of arduous work and occupational diseases	<i>No action to date</i>	
Health risks related to the transport of dangerous goods	Sworn statement of subcontracted employees' training in the transport of hazardous materials attached to subcontractors' contracts	Make an inventory of environmental/health and safety practices (KPIs on accidents, etc.) / HR policy (training, etc.) implemented in the area of transport subcontracting (FY22)
Psychosocial risks	<i>No action to date</i>	
Risk of concealed work	<ul style="list-style-type: none"> • Mandatory posting of a set of legal documents (Kbis, URSSAF, etc.) on internal FedEx Express FR platforms • Governance: a team of 15 people dedicated to the compliance controls of subcontractors: <ul style="list-style-type: none"> - Consistency between the number of people declared by a subcontractor and the number of people mobilized on an assignment - Consistency of the tax return to ensure that there is no cascading subcontracting - Originals of workers' licenses • Sworn statement to be signed in which each company undertakes not to use concealed work and to respect the legal obligations in force. 	<p>Establish an action plan to improve environmental, health, safety and HR practices at the STT Transports (FY23)</p> <p>Implementation of new environmental and safety criteria and associated evaluation procedures for all in the new subcontract (FY22)</p>
Contribution to climate change	Environmental Charter attached to the subcontracting contract for companies representing more than €100,000 in revenue.	

5. ALERT SYSTEM

The alert system deployed as part of the duty of vigilance will be based on the **FedEx Alert Line**, an existing alert line open to all stakeholders. It is hosted by the external service provider **Navex**.

The system in place, as agreed with Navex, includes any alert relating to the areas covered by the duty of vigilance.

An internal FedEx Group procedure established at the European level specifies the governance structure as well as the handling procedure and follow-up of alerts.

Alerts are centralized in the European headquarters in the Netherlands, which then coordinates investigations and responses, involving local legal teams if necessary.

Depending on the facts reported, these teams carry out an investigation or have it carried out by the departments concerned.

Communication on the alert line is made by e-mail and by postings on all the Company's sites and is mainly intended for employees. It highlights the possibility of reporting an illicit activity (crime, misdemeanor, violation of the law or regulations, etc.) or a violation of the Company's code of conduct concerning corruption or influence peddling. However, alerts on other subjects are accepted by the system.

The objective for FedEx in the coming fiscal year is to promote an expanded scope of the FedEx Alert Line and to communicate its existence and interest more broadly.

COMMITMENTS & ACTION PLAN

Re-communicate the existence of the Alert Line to all stakeholders:

- FedEx employees through the intranet and a communication on the duty of vigilance as well as a more general one on the various existing alert channels and their respective roles
- Subcontractors through postings on the Company's sites and website, and the gradual integration of the system when contracts are renewed
- Temporary workers through temporary employment agencies
- Customers through website
- Any other stakeholder through a communication on the website (FY22)

Carry out a quarterly analysis of alerts and their processing in order to identify appropriate risk prevention and reduction procedures (FY22).

6. MECHANISM FOR MONITORING MEASURES AND EVALUATING THEIR EFFECTIVENESS

The monitoring and deployment of the commitments made under this vigilance plan will be ensured by dedicated governance bodies and monitoring systems.

The evaluation of their effectiveness will be measured by indicators identified for each risk.

6.1 Vigilance plan governance

Governance bodies

In 2021, a **duty of vigilance officer** will be appointed. He/she will be responsible for the publication and revision of the «vigilance plan» document, and will coordinate quarterly and annual meetings as well as the contributions of the Departments deploying the action plan.

Monitoring device

The duty of vigilance officer will participate in the executive board, which convenes **quarterly** the Directors of the main business lines (Operations, Legal, Finance, Human Resources, Marketing, HSE), and will intervene on this occasion in order to:

- Review the progress of the priority actions and measures identified in this vigilance plan and the alerts raised by the system
- Propose solutions in case of a delay in the implementation of the action plan

The duty of vigilance officer will also organize **dedicated annual meetings**, involving the main contributors. A review of progress on the actions taken during the previous year will then be carried out, and new actions will be proposed.

QUARTERLY MEETINGS

- Review of progress on the action plan
- Review of alerts
- Proposal of solutions if there is a delay in the implementation of complementary actions, if necessary

YEARLY MEETINGS

- Review of the implementation of the action plan and the evolution of impact indicators
- Proposal of an action plan for the following year(s)
- Identification of decisions to be validated at the European level

Provisional agenda for internal meetings to monitor the vigilance plan.

An update of the vigilance plan will be published annually and presented to the Staff Representative Bodies.

6.2 Indicators

COMMITMENTS AND ACTION PLAN

Develop and consolidate strategic KPIs to monitor the impact of the actions implemented for each of the risks (e.g. carbon footprint of journeys, work accident rate, etc.) (FY21)