

Global Policy on Reporting Concerns

Introduction

Purpose

At FedEx Corporation and its subsidiary companies throughout the world (“FedEx”), we are dedicated to operating ethically, with integrity, and in compliance with the law. Our fellow officers, directors, managers, and employees (each, a “team member” and collectively, “team members”), customers, suppliers, communities, and investors expect nothing less from us. To uphold the highest standards of business ethics, it is crucial for our team members to speak up and raise questions and concerns about potential issues involving integrity or compliance, Misconduct, and safety. When you speak up, you support our ethical culture and help protect others by allowing FedEx to address the concerns.

Overview

This Policy establishes each team member’s responsibility to report suspected Misconduct. FedEx manages and investigates such reports professionally, confidentially, and appropriately. At FedEx, team members can raise concerns without fear of retaliation, and with confidence the matter will be addressed.

Scope

This Policy applies to every team member of FedEx. Third parties (e.g., vendors/suppliers and their employees, customers) may also use the reporting channels identified in this Policy to report concerns.

Some countries or territories have whistleblower laws imposing 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 these laws have appropriate reporting channels, sufficient information on the topic, required data privacy protection, and protection from retaliation. While this Policy provides globally applicable guidance on reporting concerns and non-retaliation, each FedEx subsidiary or international region may also implement policies or procedures to comply with local laws or to effectively implement this Policy.

Definitions

Accounting & Auditing Matter: Any Misconduct (defined below) related to financial fraud or questionable accounting, internal controls, or auditing.

Good Faith Report: Any report by an individual who reasonably believes the facts shared are true at the time of the report.

Misconduct: Any conduct which may violate the FedEx Code of Conduct, any FedEx policy, any law, or any regulation, or involves unethical behavior.

Policy: This Global Policy on Reporting Concerns.

Policy Details

What to Report

All FedEx team members are expected to report known or reasonably suspected Misconduct.

Reporting Accounting & Auditing Matters

If you become aware of an Accounting & Auditing Matter, you must report it. Accounting & Auditing Matters include, without limitation:

- Fraud or deliberate error in the preparation, evaluation, or audit of any FedEx financial statements or the recording and maintaining of FedEx's financial records;
- Deficiencies in or noncompliance with FedEx's internal accounting controls;
- Misrepresentations or false statements to or by a senior officer or accountant regarding a matter contained in FedEx's financial records or audit reports; or
- Deviation from the full and fair reporting of FedEx's financial condition.

Team members must report such Misconduct using 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*.

When to Report a Concern

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

How to Report a Concern

FedEx provides many different channels to report concerns. While team members are encouraged to first raise concerns to their direct manager, concerns may be reported to other members of FedEx management; to any of the Human Resources, Security, Legal, or Corporate Integrity and Compliance (CIC) departments; or via the FedEx Alert Line.

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

What Happens After You Report a Concern?

Once received, each report undergoes an initial assessment to determine whether an investigation is appropriate. If an investigation is necessary, the investigation will be assigned to the appropriate FedEx team member(s) or third party to handle. You can expect the investigator to contact you for additional information. FedEx team members have a duty to cooperate with internal investigations, and some third parties have contractually agreed to similarly cooperate with FedEx investigations.

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 reporting channels described in this Policy.

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 with your team members that they can come to you with concerns;
- Are accessible and available;
- Listen attentively. Ask questions;
- Respect team members’ concerns;
- Address the concern or refer and track the issue as needed; and
- Know when to escalate team members’ concerns to other departments.

Human Resources, Legal, or CIC departments. 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 the Legal department, or to the CIC department at integrity@fedex.com.

Security department. The Security department is also an option for reporting certain issues, such as theft, workplace violence, and security or facility breaches. You should report workplace violence directly to the Security department using the keyword: **wpvp**. For immediate assistance, contact a local Security team member; call the Global Security Operations Center (GSOC) at 1-800-872-8025; or dial 911 in case of emergency. You can also email GSOC at asksecurity@corp.ds.fedex.com.

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 form. Both the telephone hotline and online reporting are available 24 hours a day, 7 days a week virtually anywhere in the world and do not require FedEx network or credentials to access.

Based on variations in international law, reporting in some countries and territories 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 using the other reporting methods in this Policy.

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 or territory prohibit anonymous reporting). However, we encourage you to reveal your identity as it is often difficult to investigate certain anonymous reports. Providing contact information allows us to easily communicate with you about any additional information needed to effectively investigate your concerns.

Whether you choose to identify yourself or submit anonymously, all reports of Misconduct are treated confidentially. This means the information you provide will only be shared with a limited number of people on a “need-to-know” basis to sufficiently investigate or address the concern.

In certain countries and territories, FedEx may be required to inform the implicated person(s) when a complaint has been filed against them. However, we do not disclose who reported an issue to the implicated party unless required by law to do so. Similarly, all people 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.

Review Period

The Policy Owner will review this Policy at least once every two fiscal years to ensure relevance, applicability, and alignment with any legal or regulatory obligations of FedEx or management decisions that could affect this Policy.

Attestation

Team members may be required, from time to time, to attest that they have received a copy of this Policy, understand it, and comply with it.

Policy Compliance

Compliance with this Policy is required. Compliance also includes timely completion of 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 will be subject to disciplinary action, up to and including termination.

Reporting and Anti-Retaliation

If you know or suspect there is a violation of this Policy, speak up and report it to your manager; to any of the Human Resources, Legal, or CIC departments; or via the FedEx Alert Line.

Go to fedexalertline.com to report online or find the phone number that applies to your country or territory. We prohibit retaliation against anyone who makes a Good Faith Report of a known or suspected violation. We also prohibit retaliation against anyone who assists in an investigation.

Anyone who is found to have retaliated against a person who made a Good Faith Report of a violation of this Policy, or assisted in an investigation, will be subject to discipline, up to and including termination.

Related Policies and Procedures

- [FedEx Code of Conduct](#)
- [Policy on Treatment of Complaints Regarding Financial Fraud and Accounting and Auditing Matters](#)
- [FedEx Investigator Code of Ethics](#)
- Your Company's Whistleblowing Policy or Procedures
- Your Company's Open-Door Policy

Approvals

Department: Corporate Integrity and Compliance

Policy Owner: Chief Compliance Officer

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