



Global Gifts and Entertainment Policy

Introduction

Policy Overview

This Global Gifts and Entertainment Policy covers gifts, meals, and entertainment between Third Parties and FedEx. Appropriate gifts and entertainment can help build and maintain relationships. However, when gifts and entertainment are excessive, they can bring unnecessary risk to our business. This Policy is intended to help us avoid these risks, which include corruption, bribery, influence peddling, conflicts of interest, and kickbacks and reinforces our commitment to maintaining the highest standard of business and personal ethics as set forth in the [FedEx Code of Conduct](#).

Scope

This Policy applies to FedEx Corporation and its subsidiaries throughout the world (“FedEx”), and every officer, director, and employee (collectively, “team member”) of FedEx. If you have questions about a situation not covered in this Policy, you should ask your manager or your company’s Legal or Human Resources Department.

Government Officials

Gifts, meals, and entertainment for government officials are subject to additional restrictions and prohibitions. Please refer to the [Governmental Contacts and Lobbying Disclosure Compliance Policy](#) **before** offering gifts, meals, and entertainment to U.S. government officials and the [Global Anti-Corruption Policy](#) **before** offering gifts, meals, and entertainment to non-U.S. government officials.

Marketing Programs

Proposed gifts or payments to prospective or current customers that are included as part of a formal, written, customer marketing, market research, incentive, accommodations, or rewards program are not covered by this Policy. Due to the complexity of these programs and

unique risks, they require separate review and approval by your company’s Legal Department.

Definitions

“*Gifts*” are items of value accepted from or provided to a Third Party by FedEx or a FedEx team member, including but not limited to:

- Merchandise (includes gift baskets, wine, clothing, mugs, pens, collectibles, and hospitality bags);
- Tickets to in-person or virtual, sports, music, or cultural events where FedEx team members and representatives of the Third Party providing the tickets *do not* attend the event together;
- Travel or lodging *not* associated with a business conference, meeting, or event; or
- Favorable terms or discounts on a product or service for the team member’s benefit that are *not otherwise available* to all FedEx team members within the same geographic location.

“*Meals and entertainment*” include:

- Appetizers, entrees, drinks, desserts, other food and beverages, or meals; or
- Tickets to in-person or virtual sports, music, cultural events, or business conferences where FedEx team members and representatives of the Third Party providing the tickets attend the event together.

“*Third Party*” means any non-FedEx person, including customers, prospective customers, suppliers, prospective suppliers, service providers, and any person with whom FedEx does or may do business.

Accepting Gifts from Third Parties

Subject to any local law or other restrictions set forth in this Policy, team members may accept nominal gifts with a combined market

value of US \$75 or less from the same Third Party per year. Team members must never:

- Solicit or request gifts from a Third Party;
- Accept lavish or excessive gifts; or
- Accept a gift offered as a bribe, payoff, or kickback.

Exception Request

Acceptance of individual gifts greater than US \$75, or multiple gifts in one year from the same Third Party totaling greater than US \$75, must be approved by your company's Legal Department.

Cash or Cash Equivalents Prohibited

Gifts of cash or cash equivalents (such as gift cards, gift certificates, or "red packets" commonly offered in Asia) must never be accepted, regardless of amount.

Gifts from Third Parties - Examples

Q: A supplier sent me a food basket for the holidays. This is the only gift I received this year from this supplier. Can I accept it?

A: You can accept the gift basket if it is valued at US \$75 or less. If it is valued over US \$75, you will need approval from your company's Legal Department, even if you share the contents with your team.

Q: A customer sent me a Visa gift card for US \$50 as a thank you. Can I accept it?

A: A gift card that allows you to choose from a range of goods or services is considered a cash equivalent. Accepting gifts of cash or cash equivalents is strictly prohibited regardless of the amount involved.

Return or Donation of Prohibited Gifts

If a gift prohibited by this Policy is received, contact your manager or your company's Legal or Human Resources Department for guidance on how the gift may be returned, donated, or otherwise handled.

Random Drawing - Example

Q. I received a computer tablet in a random drawing at a work-related conference. Can I keep it, or can I take the same value American Express gift card they offered instead?

A. A drawing prize at a work-related event is still considered a gift and the tablet value likely exceeds US \$75. You may not keep the tablet *unless* you seek and obtain approval from your company's Legal Department. You may not accept the gift card regardless of its value.

Please refer to the [Policy on Company-Provided Gifts and Awards for Employees](#) for guidance regarding gifts from FedEx to U.S. team members.

Accepting Meals and Entertainment from Third Parties

Subject to any local law or other restrictions set forth in this Policy, team members may accept *reasonable and appropriate* meals or entertainment from Third Parties only for legitimate business purposes and if it meets the following conditions:

- Is infrequent;
- Is not solicited or requested;
- Is not given as a bribe, payoff, or kickback;
- Does not create the appearance (or an implied obligation) that the Third Party is entitled to preferential treatment;
- Is tasteful and occurs at a business-appropriate venue;
- Is reasonable and appropriate in the context of the business occasion and the parties' respective positions; and
- Complies with any specific FedEx operating company or work group limits.

Attendance by Third Party

If a representative of the Third Party does not attend the meal or entertainment with the FedEx team member, the meal or entertainment is considered a gift and is covered by the gifts guidelines.

Attendance by Spouse or Another Adult Guest

An attending team member may bring a spouse or another adult guest to a meal or entertainment event provided by a Third Party if they are necessary to assist the FedEx team member with the business purpose of the event. Manager preapproval is required.

Expenses Related to Conference Attendance

Offers by a third party to pay for lodging, travel, or conference fees related to a business-related conference, meeting, or event must be approved in advance by your company's Legal Department.

Meals and entertainment during a business-related conference, meeting, or event, are governed by the Accepting Meals and Entertainment from Third Parties section in this Policy.

Conference Invitation from Supplier - Example

Q: I was invited to a supplier's conference. The supplier offered to waive the conference fee and pay for my airfare, meals, and hotel. Can I accept?

A: You can accept conference meals provided to all attendees but must not accept lavish meals and entertainment or multiple meals and entertainment that are not provided equally to other attendees. You can accept waived conference fees with prior approval from your company's Legal Department. Airfare and lodging also require approval from your company's Legal Department.

Third-Party Negotiations

A team member must not accept any gifts, meals, or entertainment from a Third Party if that team member is the responsible officer or manager for a contract with the Third Party and FedEx is or soon will be in contract or other business negotiations with the Third Party.

Take Note

- This Policy is designed to help prevent conflicts of interest, undue influence, and situations that may be perceived as corruption.
- Complying with this Policy helps protect FedEx and our reputation for conducting business with integrity, but it also helps protect you and your integrity.
- Careful consideration should be given to each of the factors set forth in this Policy when you are offered gifts, meals, or entertainment.
- If you are unsure if a gift or an offer of meals or entertainment is reasonable or appropriate, you should consult with your manager or, if appropriate, your company's Legal Department.
- If there is not sufficient advance notice to obtain advice or approval from your company's Legal Department and you are unsure, you should politely decline.

Offering Gifts, Meals, and Entertainment to Third Parties

*Before you offer gifts, meals, or entertainment to a Third Party it is important to know if the Third Party is a Government Official or employee of a state-owned or controlled business. Gifts, meals, and entertainment for government officials are subject to additional restrictions and prohibitions. Please refer to the [Governmental Contacts and Lobbying Disclosure Compliance Policy](#) **before** offering gifts, meals, and entertainment to U.S. government officials and the [Global Anti-Corruption Policy](#) **before** offering gifts, meals, and entertainment to non-U.S. government officials.*

Team members may offer or provide gifts, meals, or entertainment to Third Parties only for legitimate business purposes and if it meets the following requirements:

- Complies with our Anti-Corruption Policy and Procedures;
- Is not given as a bribe, payoff, or kickback;
- Does not create the appearance of impropriety;
- Does not violate any gift policy of the Third Party;
- Is in good taste and occurs at a business-appropriate venue;
- Is reasonable and appropriate to the circumstances and your position at FedEx; and
- Is properly documented in FedEx's books and records.

Gifts of cash or cash equivalents (gift cards or gift certificates) are never appropriate and may not be offered to Third Parties.

Giving a Wedding Gift to a Customer – Example

Q: The transportation manager for one of our large customers is getting married. I think we should send her a wedding gift. Is that ok?

A: As long as the gift is reasonable and appropriate and complies with all other guidelines above, it would be acceptable to provide this gift. You should not, however, offer any gift in an attempt to influence the customer's business judgment or create the appearance that it can be influenced.

Gifts to Entities

FedEx as an entity or a FedEx representative may offer or provide corporate gifts (such as a painting, framed photograph, model, or sculpture) to a Third-Party *entity* (e.g., company, agency, or department) in commemoration of an event or similar celebration.

Gifts in these circumstances are subject to approval by your company's Legal Department.

Gifts to Fellow Team Members

Employees may give personal gifts (e.g., books, food, business card holders, planners, and even gift cards) to fellow employees (including from managers to team members) if the gifts are in good taste, reasonable and appropriate, and paid for by the employee and not expensed to FedEx.

Please note that personal gifts to employees should not be provided as performance awards. Performance awards should be provided to employees by FedEx under approved programs, such as the Bravo Zulu program, and must comply with the [Policy on Company-Provided Gifts and Awards for Employees](#).

Personal Holiday Gifts - Example

Q. Can I buy a meal for or give small personal gifts to my team members or coworkers especially around the holidays?

A. Yes, if the meals or gifts are in good taste, reasonable and appropriate, and paid for by the team member and not expensed to FedEx.

Q. Can I give my coworkers lottery tickets as gifts?

A. Lottery and other gambling-related items are not the best choice for workplace-appropriate gifts. Please consult your company's Legal Department before providing these types of gifts to fellow team members.

Related Policies

- [Code of Conduct](#)
- [Policy on Company-Provided Gifts and Awards for Employees](#)
- [Governmental Contacts and Lobbying Disclosure Compliance Policy](#)
- [Global Anti-Corruption Policy](#)
- Your company's Solicitation & Distribution Policy
- Your company's Charitable Contribution 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 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 to the extent permissible under local law.

Reporting and Anti-Retaliation Policy

If you know or suspect there is a violation of this Policy, speak up and report it to your manager, your company's Legal or Human Resources Department, or the FedEx Alert Line.

Go to 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).

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.

Anyone who is found to have retaliated against a person who, in good faith, has reported a violation of this Policy or assisted in an

investigation, will be subject to discipline, up to and including termination.

Policy Custodian

Chief Compliance Officer

Adoption and Update History

This Policy was adopted effective November 1, 2015.

This Policy was updated effective November 15, 2021.