



Global Export  
Controls Compliance  
Policy

## Management Commitment to Export Compliance

FedEx Corporation and its subsidiaries connect customers with goods and services in over 220 countries and territories. In doing so, FedEx is committed to complying with export controls and sanctions laws and regulations of the United States and other jurisdictions in which we operate (collectively, “Export Controls Laws”). These laws restrict the use, transfer, and access to certain goods, information, and technology for reasons of national security, foreign policy, or trade protection.

All FedEx team members must understand and fully comply with the FedEx Code of Conduct and policies and procedures designed to ensure compliance with Export Controls Laws and FedEx team members must not conduct any FedEx operations in violation of Export Controls Laws.

Each FedEx operating company shall implement procedures and training relevant to its business to ensure compliance with the requirements set out in the Global Export Controls Compliance Policy and guide team members in their everyday work.

Violations of Export Controls Laws may result in significant criminal or civil penalties for FedEx and the team members involved. In addition, team members who violate the law, the FedEx Code of Conduct, or FedEx policies and procedures will be subject to disciplinary action up to and including termination.

If you become aware of any violations of law, the FedEx Code of Conduct, or policies and procedures designed to ensure compliance with Export Controls Laws, contact your manager or your operating company’s Legal Department. If, after contacting one of these resources, your concern has not been addressed, or if you wish to remain anonymous, you should report your concern via the FedEx Alert Line. Go to [fedexalertline.com](https://fedexalertline.com) to report online or find the phone number that applies to your country or territory.

Thank you for supporting our global export controls compliance efforts.

## Policy Overview

The United States, European Union (“EU”), the United Nations (“UN”), the People’s Republic of China, and other countries and territories impose export restrictions on the transfer of certain commodities, software, and technology and the provision of services (collectively, “Controlled Items”) for national security and foreign policy reasons. Controlled Items include Items for military use, “dual-use” Items with both commercial and military applications, and Items for other restricted end uses, such as nuclear development or chemical or biological weapons. The U.S., EU, and other jurisdictions also impose territorial sanctions against designated countries and regions (“Embargoed Countries”), as well as targeted restrictions against designated governments, companies, and individuals who

have been placed on various lists (“Restricted Parties”). In addition, Export Controls Laws prohibit the participation in boycotts not sanctioned by the U.S. government, such as any boycotts of Israel. It is important that team members are aware of, understand, and comply with Export Controls Laws, because they impact customer shipments and our business.

In addition to the handling of customer shipments, Export Controls Laws may apply to certain activities that are internal to FedEx. Examples include the export of FedEx assets (e.g., X-ray machines, aircraft parts, and components); the development of software; use of certain technology; payments and relationships with banking suppliers; and relationships with vendors and other business partners.

This Policy helps team members understand how Export Controls Laws impact our day-to-day work and provides guidance for complying with these laws. FedEx operating companies shall implement procedures and training relevant to their respective business to facilitate compliance with the Policy.

### **Scope of Policy**

This Policy applies to FedEx Corporation and its subsidiary companies throughout the world (“FedEx”) and every officer, director, manager, and employee (collectively, “team members”) of FedEx.

### **Overview of Team Member Responsibilities**

As a team member, you must understand and fully comply with all Export Controls Laws, this Policy, and your operating company’s related procedures. These obligations include the following:

- Do not accept or otherwise facilitate export of Controlled Items in violation of Export Controls Laws.
- Do not operate in, contract with, provide services to, or do business with Embargoed Countries without required licenses. Cuba, Iran, North Korea, Syria, and Crimea are currently Embargoed Countries.
- Do not employ, contract with, or otherwise accept shipments from or deliver shipments to Restricted Parties without required licenses.
- Do not export Controlled Items without required export authorization or without complying with the terms and conditions of such authorization. For example, if a shipment requires an export license or license exception to export, it is the customer’s responsibility to supply the appropriate license or license exception. When carrying Controlled Items on behalf of customers, FedEx will comply with FedEx procedures and Export Controls Laws applicable to carriage of the shipment.
- Do not engage in any transaction that you suspect involves a shipment to an Embargoed Country, Restricted Party, or unauthorized end user (e.g., military end user in China or Russia), or involves an

unauthorized end use (e.g., nuclear, chemical, and biological weapons).

- Do not participate in boycotts not sanctioned by the U.S. government, such as any boycotts of Israel. Examples of prohibited actions include agreements to refuse and actual refusals to do business with Israel.
- Understand how Export Controls Laws apply to the work you do, follow applicable procedures, and complete required compliance training.
- Take steps so that records, data, and information regarding shipments and other transactions are accurate and complete.
- Be alert to circumstances or signs indicating a shipment may be destined for an inappropriate destination, end use, or end user (collectively “Red Flags”). Exercise due diligence in inquiring about Red Flags and ensure they are not ignored.
- Contact your manager, your operating company’s Legal Department, or any other channels designated by your company’s relevant compliance procedures if you become aware of Red Flags, have any concerns regarding a transaction, or have any questions related to this Policy. Potential compliance issues or violations may also be reported via the FedEx Alert Line.

## **Restricted Party Screening**

### **Team Member, Contractor, and Vendor Screening**

Each FedEx operating company shall maintain procedures for Restricted Party screening of team members, candidates for employment, contractors, and vendors.

Notify your manager or your operating company’s Legal Department if you become aware that you or another team member, any candidate for employment, any contractor, or any vendor is identified as a Restricted Party.

### **Customer Shipment Screening**

Each FedEx operating company shall maintain procedures for screening applicable customer shipments against Restricted Parties lists and confirming shipments are not from or destined to Embargoed Countries. For each customer shipment subject to screening, all available details for the shipper, intermediate consignee(s), and recipient(s) must be screened for Restricted Parties. In all cases, screening must occur at appropriate points in the shipment flow, beginning at origin.

Each FedEx operating company must provide adequate technology and resources to automate the Restricted Party screening process for applicable customer shipments and ensure matches are evaluated on a timely basis and escalated if necessary. Management must ensure that adequate resources are in place to stop any transaction that may violate any Export Controls Laws.

Team members must handle shipments involving persons or entities identified as Restricted Parties in accordance with your operating company's procedures.

### **Customer Shipments of Controlled Items**

FedEx shall include provisions requiring compliance with Export Controls Laws in customer agreements, contracts of carriage, and other applicable terms and conditions. Such provisions shall include Restricted Party, commodity, end user, and end-use restrictions and shall also require customers to determine and supply any required license or license exception, if applicable.

Each FedEx operating company shall implement procedures and training to recognize shipments of Controlled Items appropriately identified by customers and ensure that they are handled correctly.

### **FedEx Controlled Items**

Each FedEx operating company shall maintain procedures to identify and record the export classification of its own Controlled Items and to review any export or re-export of a FedEx Controlled Item to another country to determine whether a license or other authorization is required. Transferring a Controlled Item, such as technology or software, including information or source code, to a non-U.S. person located in the U.S is referred to as a Deemed Export and may also require a license or other authorization. For example, Deemed Exports include:

- Allowing a non-U.S. person to see certain technical specifications, plans, or blueprints that qualify as Controlled Items;
- Providing a non-U.S. person a tour of a facility that uses certain technology that qualifies as a Controlled Item; or
- Giving a presentation about certain technology that qualifies as a Controlled Item to an audience that includes a non-U.S. person.

If you have questions or are unsure whether a transfer of a FedEx Controlled Item is a Deemed Export or whether any export of a FedEx Controlled Item requires a license or other authorization, contact your operating company's Legal Department for guidance.

### **Embargoed Countries and Other Sanctions**

You may not ship anything on behalf of FedEx or any customer, to or from Embargoed Countries or a U.S.-, EU- or UN-sanctioned country, person, or entity without a license or other authorization from the applicable government entity. Shipments also may not be moved through an Embargoed Country (commonly referred to as a "transshipment") without appropriate licensing. Similarly, you may not facilitate such shipments by, for example, offering advice regarding the shipment, arranging for an alternative shipping method, arranging for use of non-U.S. banks, or referring the transaction to another FedEx entity or a third party.

If you become aware of any FedEx-related transaction with an embargoed or sanctioned country, person, or entity, immediately contact your operating company's Legal Department for guidance.

## Red Flags

Team members are expected to be alert for and report any Red Flags, and each FedEx operating company shall maintain procedures for reporting Red Flags and conducting appropriate due diligence and investigation.

Red Flags may include, but are not limited to:

- Shipments or transactions involving Restricted Parties
- Shipments either from or destined to a Sanctioned Country
- Prohibited and restricted end users or end uses (e.g., biological or chemical weapons, nuclear weapons proliferation, and missile technology)
- Diversion from the intended destination, particularly when:
  - The requested shipping route is abnormal for the destination;
  - A freight forwarder is listed as the ultimate destination;
  - The shipper gives different spellings of its name for different shipments, which may be an attempt to disguise its identity; or

- The shipper provides information or documents you suspect are false or requests that you provide false documentation.

## Anti-Boycott

Each FedEx operating company shall maintain procedures to avoid authorizing or participating in any boycott that is not sanctioned by the U.S. government and to appropriately report unsanctioned boycott requests to U.S. authorities as required.

Team members may not authorize or participate in any boycott that is not sanctioned by the U.S. government, such as any boycotts of Israel, including:

- Agreements to discriminate or actual discrimination against other persons based on race, religion, sex, or national origin; and
- Agreements to refuse or actual refusal to do business in Israel or with blacklisted companies targeted by unsanctioned boycotts.

If you receive a boycott-related request, whether in business documents, such as contracts and letters of credit, or via email or phone, you should report it immediately to your operating company's Legal Department. Team members should not respond to such requests in any way prior to review and further instruction from your operating company's Legal Department.

If required, FedEx will report the receipt of boycott requests to the U.S. government.

## **Training**

Each FedEx operating company shall provide adequate training for team members to comply with this Policy and related procedures.

You are expected to understand how Export Controls Laws apply to your work and timely complete any required export controls compliance training.

## **Recordkeeping**

Each FedEx operating company shall maintain record retention procedures. Such procedures shall set forth company-specific responsibilities regarding retention and maintenance of export compliance-related documents. Records relating to export controls compliance must be maintained for a minimum of 5 years. Each company's record retention schedules should align with applicable Export Controls Laws.

Team members are expected to:

- Ensure that records, data, and information are accurate and complete; and
- Retain copies of any export controls compliance-related documents, including but not limited to:
  - Agency filings
  - Copies of export licenses
  - Shipping documents

- Contracts and invoices
- Communications
- Payment records

## **Audits and Self-Assessments**

Procedures shall be maintained to periodically assess compliance with this Policy and its export controls procedures. Internal compliance audits may be conducted on a routine basis or as warranted by circumstances and audit reports will be distributed in accordance with the FedEx operating company's customary procedures.

## **Violations and Penalties**

Violations of Export Controls Laws can result in significant civil and criminal penalties against FedEx and team members and significant damage to the business reputation and global brand of FedEx.

All team members are responsible for compliance with this Policy and any applicable procedures. All managers are responsible within their teams for enforcement and compliance with this Policy, including its communication to their team members. Anyone who violates this Policy will be subject to disciplinary action up to and including termination.

## **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 Department, or the FedEx Alert Line.

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).

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.

### **Related Policies**

- FedEx Code of Conduct
- Your company's export controls compliance policy and related procedures

### **Policy Custodian**

Chief Compliance Officer

### **Adoption Date**

This Policy was adopted as of October 1, 2021.