

Investigator Code of Ethics

Introduction

Purpose

FedEx is dedicated to ensuring investigations are conducted impartially, fairly, and ethically. FedEx investigators must adhere to certain professional standards when conducting investigations on behalf of FedEx, including those identified in this Code of Ethics. FedEx investigators must also comply with the FedEx Code of Conduct and other FedEx policies and procedures.

Scope

FedEx investigators are authorized through their role or special assignment to conduct investigations on behalf of FedEx. This Investigator Code of Ethics applies to all FedEx investigators when acting in their investigator role at FedEx Corporation and its subsidiaries around the world ("FedEx"). This Policy's applicability to FedEx Europe team members may follow a different timeline pending local labor relations requirements. Please contact your local Legal department or Corporate Integrity & Compliance with any questions.

Code of Ethics

When conducting investigations, FedEx investigators will:

1. Demonstrate integrity and professionalism. This includes interacting with participants in an honest, truthful, and respectful manner.
2. Possess the necessary skills and qualifications to address the subject matter of the investigation. When necessary, supplement their knowledge and consult with subject matter experts.
3. Disclose any conflicts of interest and ensure there are no actual or potential conflicts of interest with any investigative subject matter or participant(s).
4. Use a thorough and objective fact-finding process. This includes reaching conclusions based on truth and fact and avoiding knowingly allowing personal bias, prejudice, or preconceived opinions to interfere with the process.
5. Report findings accurately and completely to ensure conclusions are based on relevant information or other evidence.
6. Ensure all participants, when available and practical, are given a full and fair opportunity to share their perspective.
7. Protect the confidentiality of the investigative process, sharing information on a need-to-know basis only or as required by law.

8. Possess the authorization necessary to conduct the investigation and never knowingly mislead any participant about the nature of the investigation, the investigative process, their authorization, or possible post-investigation actions or outcomes.
9. Safeguard investigative files and evidence collected and retained according to FedEx Global Records & Information Management Policy.
10. Make all reasonable efforts to complete investigations promptly, and ensure results are provided to relevant stakeholders, as appropriate.

Code of Ethics Compliance

Compliance with this Code of Ethics is required. Compliance also includes timely completing any mandatory training and following any procedures that may be issued under this Code of Ethics. All managers are responsible within their teams for enforcement and compliance with this Code of Ethics, including its communication to their team members. Anyone who does not comply with this Code of Ethics shall be subject to disciplinary action, up to and including termination.

Related Policies and Procedures

- [Code of Conduct](#)
- [Global Policy on Reporting Concerns](#)

Approvals

Department: Corporate Integrity & Compliance
Policy Custodian: FedEx Chief Compliance Officer
Policy Adopted Effective: March 5, 2025