



Policy Prohibiting Trafficking in Persons

September 2015

Table of Contents

Policy Statement.....	3
Prohibited Activities.....	4
Obligations of FedEx Employees.....	6
Obligations of FedEx Agents	7
Reporting.....	8
Compliance Plan.....	9

Policy Statement

This Policy Prohibiting Trafficking in Persons (the “Policy”) applies to all FedEx Operating Companies who contract with the U.S. government.

As stated in the FedEx Code of Business Conduct and Ethics, lawful and ethical behavior is critical to our continued success and is required. You must comply with those laws and regulations relating to your business conduct. In addition, you must avoid and report any activity that involves, or could lead to the involvement of, FedEx in any potentially unlawful practice.

FedEx is committed to protecting and advancing human rights in all of our operations. We treat others with respect and dignity, encourage diversity and diverse opinions, provide safe working conditions and promote equal opportunity for all.

FedEx supports the policies adopted by the United States government to combat the trafficking of persons for any purpose. As set forth in the following pages, FedEx prohibits trafficking-related activities and we expect our suppliers and contractors to uphold these important principles, as well. FedEx encourages you to report any suspected violations.

If you have reason to believe that a legal or ethical violation has occurred, it is your duty to report it to your manager, your primary contact at FedEx (“Company Contact”) or the legal or human resources department, or by using the FedEx Alert Line. Our policies forbid any form of retaliation against you for fulfilling this obligation.

Prohibited Activities

FedEx prohibits all activities relating to the trafficking of persons. You may **NOT**:

- Engage in severe forms of trafficking (using fraud or coercion) in persons
- Procure commercial sex acts
- Use forced labor
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place
- Charge employees recruitment fees
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including:
 - wages and fringe benefits
 - the location of work
 - the living conditions
 - housing and associated costs (if provided by FedEx)
 - any significant cost to be charged to the employee
 - if applicable, the hazardous nature of the work

Prohibited Activities (con't)

FedEx prohibits all activities relating to the trafficking of persons. You may **NOT**:

- Fail to provide return transportation or pay for the cost of return transportation upon the end of employment for certain employees who were brought from one country to another (consult with your company's legal department to determine whether this situation applies)
- Provide or arrange housing that fails to meet the host country housing and safety standards
- If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing and in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating

If you have questions about any of your job responsibilities that may relate to the above activities (e.g., recruitment, arranging housing, etc.), please consult with your company's legal or human resources department.

Obligations of FedEx Employees

- All FedEx employees and agents are expected to be familiar with the prohibited human trafficking activities described above and to avoid them. Failure to abide by this policy may result in severe disciplinary action up to and including termination.

- If you become aware of an activity that you suspect is a violation of this Policy, you must report it through one of the channels noted below in the **Reporting** section.

- If requested by the legal department, you must cooperate with any investigation into suspected prohibited activities. FedEx is committed to cooperating fully with governmental authorities in investigating violations, including
 - providing timely and complete responses to government auditors' and investigators' requests for documents;
 - providing reasonable access to its facilities and staff to allow governmental authorities to conduct audits, investigations, or other actions to ascertain compliance with the Trafficking Victims Protection Act of 2000 (22 U.S.C. chapter 78), E.O. 13627, or any other applicable law or regulation establishing restrictions on trafficking in persons, the procurement of commercial sex acts, or the use of forced labor; and
 - protecting all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, without preventing or hindering the ability of these employees from cooperating fully with governmental authorities.

Obligations of FedEx Agents

- This Policy applies to those agents performing services on behalf of FedEx or operating under the FedEx brand name to the extent set forth in their respective agreements with FedEx and permitted under applicable law. Failure to abide by this policy may result in termination of the business relationship with FedEx.

Reporting

If you know of or suspect there is a violation of any law, regulation, the Code, this Policy or any other FedEx policy, any unethical behavior related to FedEx, or any questionable accounting, internal accounting controls, auditing matters or fraud related to FedEx, you must immediately report it to your manager, Company Contact or your company's legal or human resources department or use the complaint processes within your operating company. We encourage you to talk to managers, Company Contacts, members of your company's legal or human resources department or other appropriate personnel when in doubt about the best course of action in a particular situation. If you report a violation or suspected violation to your manager, Company Contact or a member of your company's human resources department and appropriate action is not taken, you must contact your company's legal department. FedEx policies prohibit any form of retaliation against a person who reports in good faith any known or suspected misconduct.

In addition to the people above, you may report suspected human trafficking activities to:

The FedEx Alert Line:

1.866.42.FedEx (1.866.423.3339)

www.fedexalertline.com

The Global Human Trafficking Hotline:

1.844.888.FREE (1.844.888.3733)

help@befree.org

Compliance Plan

FedEx maintains a compliance plan to ensure compliance with the principles and objectives of this Policy. The contents of the compliance plan include:

- An awareness program to inform employees about the U.S. government's policy prohibiting trafficking-related activities, the activities prohibited, and the actions that will be taken in response to violations;
- A process for employees to report, without fear of retaliation, activity inconsistent with this Policy;
- A recruitment and wage plan that only permits the use of recruitment companies with trained employees, prohibits charging recruitment fees to the employee, and ensures that wages meet applicable host-country legal requirements or explains any variance;
- A housing plan that ensures that any provided housing meets host-country housing and safety standards; and
- Procedures to monitor the compliance of agents and subcontractors with the requirements of this Policy.

If you would like more information regarding the compliance plan, please contact your company's legal department.