

# **FedEx Corporation**

## **Policy on Political Contributions**

### **Company Political Activities**

FedEx actively participates in the political process with the ultimate goal of promoting and protecting the economic future of the company and our stockholders and employees.

We are subject to extensive regulation at the federal and state levels and are involved in a number of legislative initiatives in a broad spectrum of policy areas that can have an immediate and dramatic effect on our business and operations. Through our participation and that of our employees, we ethically and constructively promote legislative and regulatory actions that further the business objectives of FedEx and attempt to protect FedEx from unreasonable, unnecessary or burdensome legislative or regulatory actions at all levels of government.

### **Policies and Procedures for Political Contributions**

One way to participate effectively in the political process is by making prudent political contributions in compliance with applicable laws and reporting requirements. FedEx's political contributions and expenditures are made to further the best interests of the company and our stockholders and employees, and are made without regard to the personal political preferences of individual FedEx Board members, officers and employees.

Political contributions of all types are subject to extensive governmental regulation and public disclosure requirements, and FedEx is fully committed to complying with all applicable campaign finance laws. For example, under U.S. federal law, FedEx cannot directly support candidates for federal office, so we do not. In addition, while some U.S. states allow corporate contributions to state and local candidates or ballot issue campaigns, it is our policy not to make such contributions. FedEx also does not make independent expenditures.

In addition, FedEx does not make corporate contributions to groups organized under section 501(c)(4) or section 527 of the Internal Revenue Code, other than membership dues, event sponsorships, and contributions to the organizational committees of the Democratic and Republican national party conventions and the annual conferences of the Democratic and Republican Governors Associations. None of these expenditures are used to directly support any election-related activity or ballot initiatives at the federal, state or local level.

These limited corporate expenditures are approved by the Corporate Vice President of Government Affairs, in consultation with appropriate members of FedEx senior management.

### **Voluntary Political Participation by Employees**

FedEx values the right and responsibility of our employees to participate in the political process. Such participation is entirely a matter of personal choice. Employees are free to support the political process in a variety of ways, such as through personal contributions or by volunteering

their personal time to candidates or organizations of their choice. These activities, however, must not suggest FedEx's support and must not be conducted on company time or involve the use of any company resources, such as telephones, computers or supplies. In addition, employees may not make or commit to political contributions on behalf of FedEx, and FedEx will not reimburse or otherwise compensate an employee for his or her personal political contributions.

FedEx provides an opportunity for our employees to voluntarily participate in the political process by joining the company's non-partisan political action committee, the FedExPAC – FedEx Corporation Political Action Committee ("FedExPAC"). The FedExPAC keeps employees aware of important issues and decisions made by government officials that can affect our business, and allows our employees to pool their financial resources to support political candidates, campaigns and committees in furtherance of the best interests of the company and our stockholders and employees.

The political contributions made by the FedExPAC are funded entirely by the voluntary contributions of our employees (no corporate funds are used), and decisions about membership in the FedExPAC have no bearing on an employee's career at FedEx. Moreover, the FedExPAC's activities are subject to comprehensive regulation by federal, state and local governments, including detailed disclosure requirements, such as monthly reports filed with the Federal Election Commission. These reports are publicly available at [www.fec.gov](http://www.fec.gov) (Committee ID No. C00068692) and include an itemization of the FedExPAC's receipts and disbursements, including any political contributions, over a certain amount (currently, \$200).

Requests for the FedExPAC to make a political contribution must be forwarded to the Corporate Vice President of Government Affairs or her designee. A committee composed of appropriate members of FedEx senior management decides which candidates, campaigns and committees the FedExPAC will support based on a nonpartisan effort to advance and protect the best interests of the company and our stockholders and employees. The FedExPAC contributes to the campaigns of candidates who share the company's views on public policy, serve as congressional or legislative leaders, represent geographical areas where FedEx has a major business presence, or serve on committees with jurisdiction over legislation important to the company. Other contribution considerations include prior voting records, prior committee assignments, contribution history and the type of political race (*e.g.*, primary or general election). All contributions are made without regard to the personal political preferences of individual FedEx Board members, officers and employees.

### **Participation in Trade Associations**

Our participation in the political process is designed to promote and protect the economic future of FedEx and our stockholders and employees, and we maintain memberships with a variety of trade associations expressly for that purpose. Participation as a member of these associations comes with the understanding that we may not always agree with all of the positions of the organizations or other members. We believe the associations, however, take positions and address issues in a collective industry manner and often advance positions consistent with company interests that will help us provide strong financial returns and enhance long-term stockholder value.

## **Compliance and Oversight**

Management is responsible for implementing effective reporting and compliance procedures designed to ensure that FedEx's political activities are conducted and disclosed in accordance with applicable law and this policy. In addition, management is responsible for monitoring the appropriateness and effectiveness of the political activities undertaken by the most significant trade associations in which FedEx is a member.

The Nominating & Governance Committee of the FedEx Board of Directors (the "Committee") assists the Board in oversight of the company's political activities. The Committee reviews and discusses with FedEx's Executive Vice President, General Counsel and Secretary, at least annually, the company's political activities, including political spending and lobbying activities and expenditures. The Committee also periodically reviews and discusses this policy with management, and shall approve any changes to this policy.

*Amended June 9, 2019*