



Code of Conduct

Delivering with integrity



Contents

Message from leadership	4	Being accountable	24
		Refuse to engage in corruption and bribery	25
Appreciating our Code and values	6	Maintain ethical third-party relationships	27
The Code of Conduct	7	Prevent money laundering	28
Scope	7	Be responsible with gifts and entertainment	29
Enforcement	9	Avoid conflicts of interest	30
Waivers	9	Abide by international trade controls	32
Our culture values	10	Compete with integrity	33
Integrity and compliance oversight	11	Respect consumer rights	33
Doing the right thing	12	Safeguarding our resources	34
Know your responsibilities	13	Protect confidential information	36
Make ethical decisions	14	Safeguard data	37
Lead by example	15	Maintain information security	38
		Do not trade on insider information	38
Speaking up	16	Keep accurate business records	38
Report concerns	17	Fight external and internal fraud	39
Trust the FedEx Alert Line	17		
Ensure non-retaliation	17	Committing to do good	40
Understand investigations	18	Pursue environmental stewardship and sustainability	41
		Demonstrate FedEx cares	42
Taking care of each other	19	Follow our rules for donations and political activities	42
Act with respect	20		
Value diversity, equity, and inclusion	20	Concluding advice	43
Uphold equal opportunity and oppose harassment	21		
Follow safety and security rules	22		



Letter from our President and CEO

The world relies on FedEx to deliver. We have earned this trust by connecting people and possibilities resourcefully, responsibly, and with integrity. I am proud of what our team has built over a half-century and counting, and I am energized by our mission to move FedEx and the world from now to next.

While driving what's next means innovating and evolving to meet the needs of our customers, one thing that will never change is our insistence that ethical decision-making be first and foremost in all that we do.

FedEx has a culture of accountability, collaboration, innovation, and action. We take our pledge to always do the right thing incredibly seriously. We count on you to lead by example, to honor your commitments, and to uphold the law, our policies, and our culture values, which include taking care of each other, doing good, owning outstanding, driving business results, and creating what's next.

The FedEx Code of Conduct is a resource for all team members and covers key legal, ethical, and behavioral expectations every FedEx team member is required to follow. We have an open-door policy at FedEx, which means any team member can

speaking with a manager, human resources, or a legal representative at any time for advice, guidance, or to raise concerns. You may also contact the FedEx Alert Line if you believe a violation of the law, our Code, or our policies has occurred. Our Code forbids any form of retaliation against you for reporting concerns in good faith, and we will always act quickly and diligently to review and resolve issues if they arise.

FedEx is one of the world's most trusted and admired companies because of the dedication and drive of our team members. Thank you for delivering on our Purple Promise – to make every FedEx experience outstanding. Every day, we build upon our legacy and strengthen FedEx for the future by acting with integrity and never settling for being better when the world needs our best.

A handwritten signature in dark ink that reads "Raj".

Raj Subramaniam
President and CEO
FedEx Corporation

Having a strong culture of integrity allows us to serve our communities, innovate, and quickly adjust when opportunities arise.





Appreciating our Code and values

At FedEx we pursue excellence and act with integrity. This commitment is embodied in the Purple Promise: “I will make every FedEx experience outstanding.” Our high standards, along with the work and dedication of our team members, have made us one of the most admired and trusted companies in the world.

The Code of Conduct

We are committed to acting with integrity and in compliance with the law. Our commitment is reflected in this Code of Conduct (“Code”). The Code serves as a public statement of our values. It also summarizes our key policies.

The Code provides team members with a clear set of rules and establishes expectations for ethical behavior. All FedEx team members must read and comply with the Code. While comprehensive, our Code and policies can’t address every situation we may encounter. When you are unsure of what to do, talk with your manager. Also check our other policies for more information. Always respect the requirements and the intent of our Code and policies.

Scope

The Code applies to every officer, director, manager, and employee (collectively, “team members”) of FedEx Corporation and its subsidiary companies. It also applies to members of the FedEx Corporation Board of Directors when acting in their role as Board members or in any other role related to FedEx. Certain sections of this Code also apply to third parties performing services on behalf of FedEx.





The **Purple** Promise

Consistently proving our commitment to compliance and ethics demonstrates our reliability and builds trust with our customers, team members, and the communities we serve.

People around the world see the FedEx name and logo each day. How we behave affects what people think of us. Our actions and decisions fuel our reputation.



Enforcement

FedEx is committed to preventing and detecting behavior that violates the Code. We will take swift action to stop any detected or reported violations of the Code and discipline team members who engage in such behavior, up to and including termination of employment in accordance with our policies and procedures.

FedEx officers, directors, and managers are responsible for ensuring compliance with company policies and procedures within their area of responsibility. They must also promptly report violations of company policies, illegal acts, and other concerning activity to their supervisor, human resources, or the legal department, and implement suitable disciplinary action. Failure to exercise appropriate oversight may subject officers, directors, and managers to discipline up to and including termination.

FedEx maintains policies regarding the recoupment from certain current and former officers of incentive compensation, bonuses, or stock awards in the event of a financial restatement, or fraud or willful misconduct in the performance of their duties that results in reputational or financial harm to FedEx.

Waivers

FedEx may grant specific waivers to the Code but will not grant any waivers to allow violations of law. Applications for a waiver should be made to the legal department and must be approved by the FedEx Corporation General Counsel or their designee.

Applications for waivers of the Code for executive officers or members of the Board of Directors of FedEx Corporation must be made to the Chair of the Audit and Finance Committee of the Board of Directors and must be approved by the full Board. Any such waiver will be promptly disclosed.

Our culture values

The FedEx culture is built on our belief that our shared values and principled behavior will reinforce our ability to meet and exceed our strategic goals. By working together, we use the strengths of our networks, people, and assets in support of our customers.



Take care of each other.

- We put safety above all.
- We make “safety” a place, a habit, and a mindset.
- We bring our whole selves to work.
- We value our differences and believe every voice counts.



Commit to do good.

- We make connections.
- We seek ways to protect our planet.
- We do the right things the right way.
- We help communities thrive.



Own outstanding.

- We make every experience matter.
- We simplify and work smarter for our customers.
- We find ways to stand out from the crowd.
- We are fast, flexible, and focused.

The values and behaviors we encourage, model, and reward become embedded in our culture. We must consider our actions and let our commitment to ethical and lawful behavior lead our decision-making.



Drive business results.

- We know how our roles support the business.
- We deliver results aligned to our strategy.
- We invest wisely to drive profit.
- We create value for our shareholders.



Create what's next.

- We anticipate the future.
- We stay curious.
- We act now to stay ahead.
- We provide a path to growth for everyone.



Integrity and compliance oversight

The FedEx Board of Directors and management teams are dedicated to maintaining our strong culture of ethics, integrity, and reliability. Our Board has delegated compliance oversight responsibility to its Audit and Finance Committee. This includes the responsibility to oversee the company's compliance and ethics programs, including the Code, integrity and compliance policies, and the FedEx Alert Line.

Our Chief Compliance Officer leads our corporate integrity and compliance department. The corporate integrity and compliance department provides compliance program oversight, strategic direction, and resources to team members across the enterprise.

If you have questions about the standards described in the Code, ask your manager, human resources, the legal department, or the corporate integrity & compliance department at integrity@fedex.com.

Other Resources

[Corporate Integrity and Compliance](#)



Doing the right thing

The FedEx Code of Conduct connects us no matter where we are around the world. Our Code gives us tools we need to *do the right thing, live our values, own outstanding, and deliver with integrity.*

Know your responsibilities

All FedEx team members must follow the law, act ethically, and:



Read and understand the Code and the underlying policies.



Follow the stated principles and the intent of our Code and company policies in all business decisions.



Ask questions and seek guidance when a course of action is unclear.

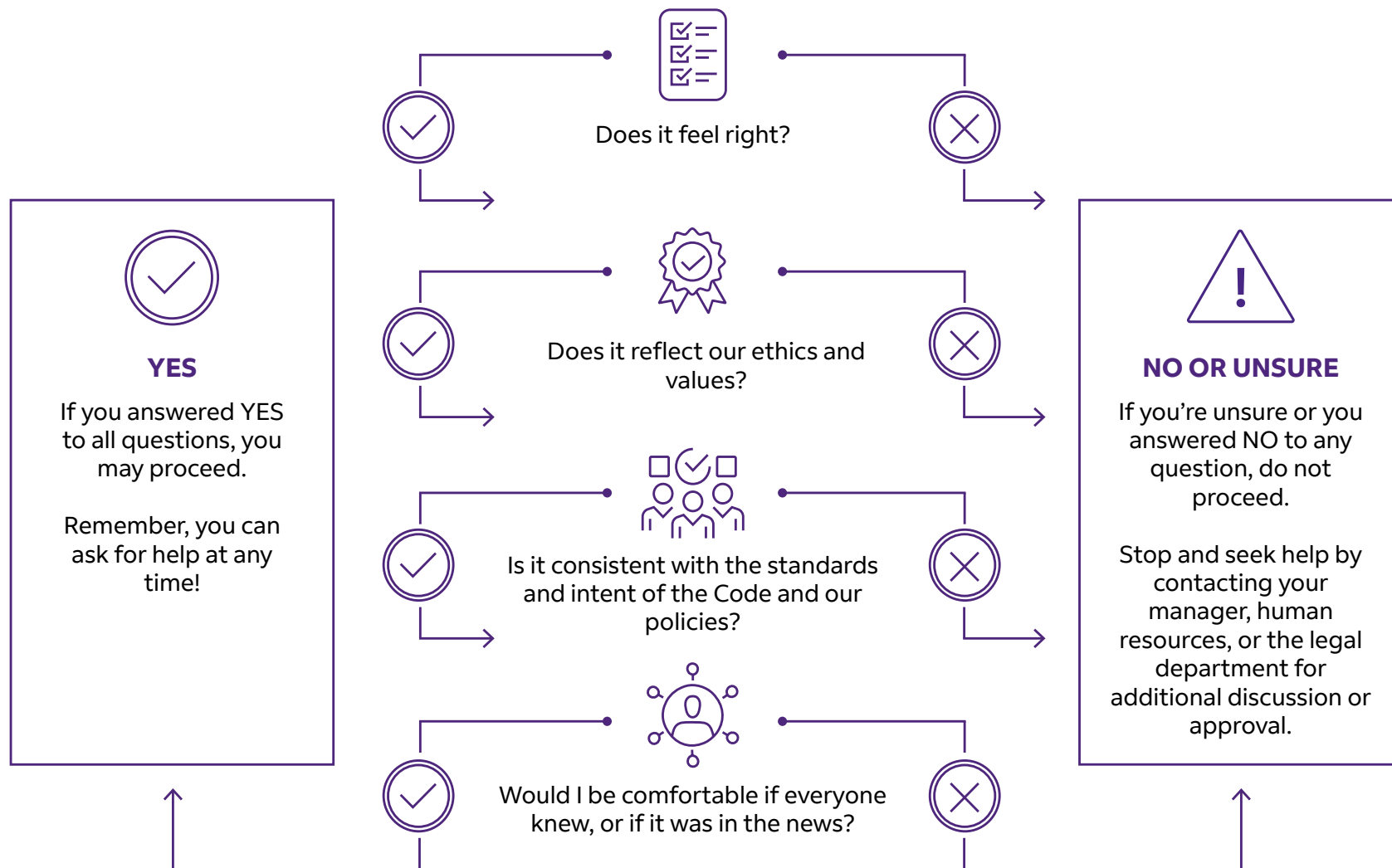


Promptly report known, suspected, or potential violations of our Code, company policies, or the law.



Make ethical decisions

We must do the right thing and be ethical, even in a complicated or tricky situation. The Code and our strong culture of integrity empower you to make the right decisions.



Lead by example

We rely on managers to support team members in doing the right thing, the right way. Our managers have a heightened responsibility to promote ethical behavior, build trust, and lead by example.

FedEx expects all managers to:

- Know and follow the Code.
- Talk about the key messages in the Code with team members.
- Encourage delivering on the Purple Promise with integrity.
- Be a good example and a positive role model.
- Create an open environment where team members are comfortable speaking up.
- Be receptive and listen to team members' ideas, questions, or ethical concerns.
- Always take reports of misconduct seriously and escalate reports to human resources and the legal department when appropriate.
- Prevent retaliation against team members who report concerns in good faith.

Our Code in action



We are trying to meet performance goals on my team. When we get close but miss our goals, our manager bumps our numbers up. I suspect my manager's actions violate our Code, but I'm not sure.

What should I do?



Changing any performance numbers or other records can be a significant issue and may even violate the law. This action also appears unethical and untrustworthy. Since your manager is part of the concern, you should reach out to another manager, human resources, the legal department, or the FedEx Alert Line to report your concern.

Other Resources

[Corporate Integrity and Compliance
Manager Resource Center](#)

A smiling man with short dark hair and a beard, wearing a blue button-down shirt, is holding a white FedEx box and a silver laptop. The FedEx logo is prominently displayed on the box. He is looking towards the camera with a friendly expression.

Speaking up

It is important to ask questions, share ideas for improvement and raise concerns to your manager. All managers have an “open door” so that you can go to them for help. If you think something is not right or is inconsistent with the law, our Code, or other company policies, you must speak up, get help, and report your concern.

Report concerns

Unethical, illegal, unsafe, or other improper actions are contrary to FedEx values. These actions can harm our team members, customers, and our brand. By speaking up, you are preserving our culture and protecting others. We can't address concerns unless we first know about them.

If you believe a legal, policy, or ethical violation has occurred, it is your duty to report it to a manager, human resources, the legal department, or the FedEx Alert Line. FedEx prohibits any form of retaliation against a person who reports in good faith any known or suspected misconduct.

Trust the FedEx Alert Line

The FedEx Alert Line allows you to provide confidential reports of any known or suspected violation of the law, the Code, or other company policy or other unethical or unsafe behavior. You can make a report online or, in most countries and territories, by calling a toll-free number. Both options are available 24 hours a day, 7 days a week, virtually anywhere in the world. An independent third party intakes all reports.

When making a report, you can choose to identify yourself or, where allowed by law, you can report anonymously. Visit fedexalertline.com to report online or to find the phone number for your country or territory. In the U.S. the phone number is 1.866.42.FedEx (1.866.423.3339).

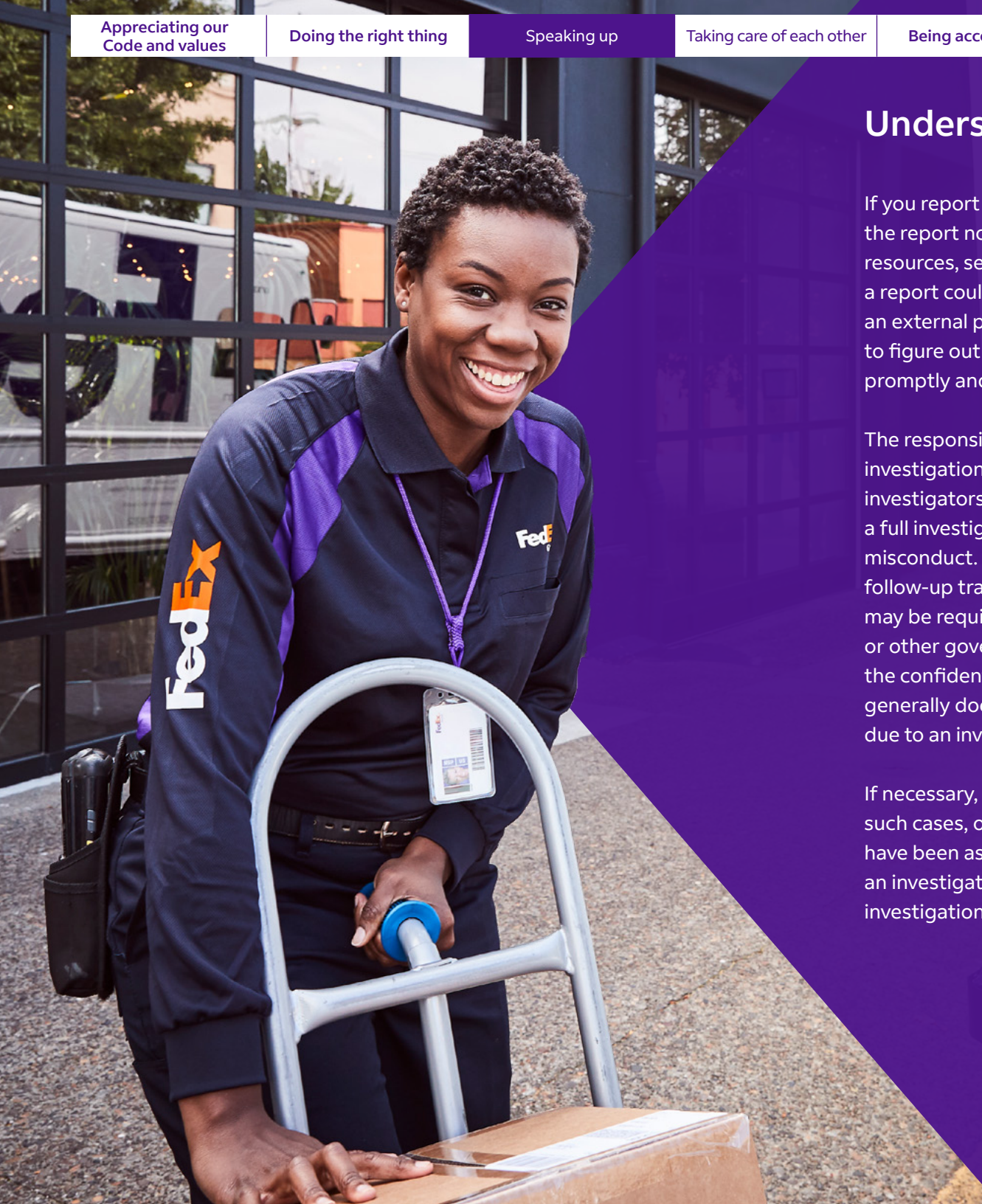
Ensure non-retaliation

All managers are expected to promote a safe environment for team members to ask questions, voice concerns, and report incidents. FedEx prohibits retaliation against anyone for raising or reporting an issue in good faith. If you suspect retaliation, speak up and report your concern.



Other Resources

[Global Policy on Reporting Concerns](#)



Understand investigations

If you report a violation of law, the Code, or a policy or procedure, the report normally will be handled by investigators from human resources, security, safety, and the legal department. If appropriate, a report could be handled by the internal audit department or by an external party. In each case, those assigned to the matter will try to figure out if misconduct has occurred. If so, FedEx will respond promptly and appropriately.

The responsible team members at FedEx will keep reports and investigations confidential to the extent possible. Sometimes investigators may need to use or disclose information to conduct a full investigation and provide a fair process to anyone accused of misconduct. They also may use selected information to implement follow-up training or corrective action. For certain matters, FedEx may be required to disclose information to regulatory agencies or other government authorities. Because we strive to protect the confidentiality of all participants in an investigation, FedEx generally does not disclose the outcome or specific actions taken due to an investigation, unless required by law.

If necessary, we may ask you to help with an investigation. In such cases, our policies require you to cooperate. Whether you have been asked to assist or not, you must not interfere with an investigation, offer false information, disclose details of an investigation to third parties, or alter or destroy records.



Taking care of each other

As a multinational enterprise doing business in over 220 countries and territories, we support the ability of all people to make choices about their lives and develop their potential. We believe in treating people with dignity and respect. We act responsibly to contract with suppliers that also respect human rights. Our position on human rights means that:

- We are committed to protecting human rights in our operations.
- We prohibit the use of illegal child, compulsory, or forced labor.
- We have zero tolerance for, and prohibit, human slavery and trafficking.
- We pay fair wages and follow wage-and-hour laws in the countries and territories where we operate.
- We require our third parties to respect human rights.
- We encourage team members to report any suspected violation of human rights.

Act with respect

Respecting each other and succeeding together are among our core values at FedEx. We achieve meaningful and long-term success when we treat everyone with respect and support a culture where we all belong.

We make every effort to maintain professional behavior at work. Showing professionalism at work means being respectful and courteous, helping others, and being positive, accountable, responsible, and honest. Every team member can create trust by demonstrating and inspiring behaviors that meet or exceed our standards.

Value diversity, equity, and inclusion

Diversity is a strength, woven across our entire organization. We promote a diverse, fair, and inclusive work environment where we embrace differences. Valuing equity means we are committed to empowering diverse voices and creating access to leadership, education, and employment opportunities for all our team members. We can all build connections and find common ground with each other. We are stronger together.



Other Resources

[Policy Prohibiting Trafficking in Persons](#)

Uphold equal opportunity and oppose harassment

People are our greatest asset at FedEx. We are committed to equal employment opportunities. We hire, contract, evaluate, compensate, and promote team members based on merit, qualifications, job-related requirements, and performance. We provide reasonable accommodations to team members with disabilities.

We do not tolerate discrimination, harassment, or bullying based on any characteristic protected under national, state, or local laws. These protected characteristics include race, color, ethnicity, national origin, religion, sex, age, genetic information, citizenship, caste, disability, marital status, pregnancy, sexual orientation, gender identity, gender expression, and veteran status.

We prohibit sexual harassment. Sexual harassment may take many forms, including unwelcome sexual advances, requests for sexual favors, threats, and unwanted physical contact. Sexual harassment also may occur through words or actions such as inappropriate comments or gestures. Unwelcome email or text messages, or pictures or comments posted on social media, can also constitute sexual harassment.

The environment we create for our team members and how we do our work matters. When we are tolerant, courteous, and respectful to everyone, we are aligned with our values.

Our Code in action



Two of my teammates make a lot of jokes at work. Sometimes their jokes seem rude or questionable, but I don't think they mean any harm. I try to avoid them because their jokes bother me.

What should I do?



Conduct that people find unwelcome, or offensive, can amount to harassment. Talk to your manager, human resources, or the legal department about your concerns. If you wish to remain anonymous, you can make a report through the FedEx Alert Line.

Follow safety and security rules

We are committed to maintaining a healthy and safe workplace. We all must follow health and safety rules and protocols that apply to our jobs. This includes keeping an alcohol-free and drug-free workplace. Following these rules helps prevent unsafe working conditions.

FedEx prohibits workplace violence including violent or threatening behavior. We do not allow any other activity that could cause a person to feel unsafe, insecure, or fearful. Prohibited actions include intimidation, bullying, stalking, and verbal or physical assaults. We also prohibit any other expression of hostility or aggression perceived to put anyone's safety at risk, and written, spoken, or physical threats directed at another person.



All threats and suspicious activities must be reported. If you believe you or someone else might be in imminent danger, you should immediately contact your local emergency response number. In the U.S., dial 911.

When you are safe, report the situation to your manager, FedEx security, or the FedEx Alert Line.

We help protect each other by immediately reporting work-related safety or security concerns. Report unsafe working conditions, safety risks, accidents, injuries, drug or alcohol abuse, violent or threatening behavior, or any situation that might be dangerous in the workplace. Take care of each other.

Working under the influence of illegal or unauthorized drugs or alcohol worsens job performance and puts everyone's safety at risk. Drugs may include illegal drugs, controlled substances, and misused medication.



We prohibit:

- Unauthorized use of or working under the influence of alcohol in violation of FedEx policies or the law.
- Working under the influence of illegal or unauthorized drugs, or legal drugs used improperly.
- Possessing, selling, using, or distributing illegal drugs on FedEx premises.
- Possessing, selling, using, or distributing prescription drugs on FedEx premises except for possession and use by the person for whom they are prescribed.

FedEx may require team members to undergo drug and alcohol testing as permitted by law. We encourage you to seek help if you think you may have a drug or alcohol problem.

Other Resources

[Workplace Violence Prevention](#)





Being accountable

FedEx opposes corruption and bribery in any form, everywhere we do business. Bribery and corruption are wrong, illegal, and against our values.

Refuse to engage in corruption and bribery

We comply with the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, the French Sapin II, the Canadian Corruption of Foreign Public Officials Act, the Brazil Clean Companies Act, the Swiss Criminal Code, and all other applicable anti-corruption laws and regulations wherever we do business.

We will not engage in bribery or corruption, look the other way, or ignore red flags of corruption that we may encounter in our business. We prohibit our team members and those acting on our behalf from accepting, offering, promising, or making improper payments or bribes, or engaging in influence peddling, to improperly impact a business decision or gain a business advantage.



For example, we will not use gifts, meals, entertainment, travel, employment, paid or unpaid internships, sponsorships, charitable donations, or other benefits to or from a third party to improperly influence a government or private party decision or to gain a business advantage. We will not request or accept any bribe, kickback, or other improper payment or benefit to award a FedEx contract or business to a third party.

FedEx prohibits our team members and those acting on our behalf from engaging in bribery and other corrupt schemes like kickbacks, improper payments, or trading in influence. If you are asked to make an improper payment or bribe, or are offered a bribe or kickback, immediately contact your manager and the legal department or the FedEx Alert Line to report the matter. These acts are illegal in most countries and can expose you and FedEx to criminal prosecution and other penalties.

FedEx also prohibits the payment of small bribes including facilitation payments. Facilitation payments are typically lesser amounts of money, paid to government employees so they will more quickly finish a routine duty such as issuing permits, starting utility services, or clearing a shipment through customs. Facilitation or expediting payments are a form of corruption, and they are illegal under the U.K. Bribery Act and the laws of most other jurisdictions.

The payment of even small bribes undermines the rule of law, decreases opportunities for sustainable economic development, and does not fit within the FedEx culture of integrity and compliance. We don't bribe.

Unfortunately, corrupt individuals may use threats to try to force or extort an improper payment. If someone threatens your health or safety, do what is necessary to protect yourself. Then report the incident, including whether you were forced to make a payment, to your manager and the legal department or FedEx Alert Line as soon as possible.

Finally, we maintain internal financial controls to prevent and detect bribery and corruption. We keep accurate books and records. We properly record all payments and do not try to conceal any improper payments within our books and records. Accuracy and details matter.



Influence peddling means using one's role or connections to obtain favors or preferential treatment for another, usually in exchange for a payment.



Other Resources

[Global Anti-Corruption Policy](#)

Maintain ethical third-party relationships

Our business dealings with vendors, consultants, service providers, and other third parties are based on principles of honesty, fairness, and respect. We select and keep suppliers and other third-party business acquaintances on merit. We hold these third parties to the same high standards we have for our own behavior and ethical decision-making, and we expect them to be trustworthy and accountable.

An unethical or illegal act by a third party working on our behalf can damage our reputation as a world-class leader, cause a loss of goodwill, and affect our business. To help protect ourselves and our business, we choose to work with third parties that are committed to acting ethically and following the law. FedEx uses anti-corruption controls like risk assessments and due diligence when engaging and retaining third parties. This helps ensure we select qualified and trustworthy third-party vendors, consultants, and service providers.



Our Code in action



I work with a third party that handles the customs clearance of our shipments. I suspect they may improperly pass part of the fee they charge us to the Customs Authority. **Is this a problem for us?** We don't control their operations, and we would never authorize these payments.



Yes, this is a problem. Working with third parties that may be paying bribes is extremely concerning. The issue must quickly be addressed. You must immediately report the matter to the legal department or the FedEx Alert Line.

Prevent money laundering

FedEx is committed to helping combat criminal activity and terrorist financing enabled by money laundering. Money laundering is the process of making criminal proceeds appear legitimate by concealing or disguising their nature, location, source, ownership, or control.

We will not enter any arrangement that has been identified as a potentially suspicious money laundering activity. It is important that we conduct business with reputable suppliers, customers, and other third parties for legitimate purposes, with legitimate funds. Team members are responsible for reviewing transactions and documentation that they oversee for accuracy and an appropriate level of detail. We also should be alert to any red flags of money laundering.



Red flags of money laundering include:

- Requests for large cash payments or other unusual payment terms.
- Structuring or breaking down payments into smaller amounts or dividing transactions into amounts that avoid government reporting requirements.
- Fund transfers to or from countries or territories unrelated to the transaction.
- Fund transfers to or from unrelated parties.
- Reluctance by a third party, customer, or supplier to supply complete or truthful contact information.
- Other activities outside the normal course of business.

If you become suspicious of potential money laundering activities, speak with your manager, the legal department, or the FedEx Alert Line at once.

Be responsible with gifts and entertainment

Reasonable and appropriate business gifts, meals, and entertainment help promote good business relationships. However, we must be careful to never give or receive anything that might improperly influence a business decision. FedEx is committed to making fair and transparent business decisions. Doing so helps protect our reputation and encourages trust.

Gifts, meals, travel, and entertainment should be moderate, appropriate to the region or local culture, and intended only to promote FedEx business relationships. When giving or receiving gifts, meals, travel, or entertainment, we must understand and follow our policy requirements.



Acceptable

- Promotional items
- Flowers
- Food



Prohibited

- Cash
- Gift cards
- High-value gifts
- Vacations



Team members may accept gifts, meals, or entertainment from a third party in these instances:

- Are infrequent, not asked for, and not lavish or excessive.
- Are not intended as a bribe, payoff, or kickback.
- Do not create the appearance of preferential treatment.
- Are reasonable and business-appropriate.
- Are in line with any specific policy limits.

Other Resources

[Global Gifts and Entertainment Policy](#)

Avoid conflicts of interest

While we are employed by FedEx, our primary business loyalty must be to FedEx. There may be a conflict of interest when something or someone we are personally involved with outside of work at FedEx may interfere with our responsibilities to FedEx. When we have a conflict of interest, it can affect our ability to act sincerely and in the best interests of FedEx when making business decisions.

To avoid conflicts of interest, we must avoid activities, investments, or close personal relationships that create, or appear to create, a conflict between our personal interests and the interests of FedEx. In addition, FedEx specifically prohibits team members or their close personal relationships from accepting money, gifts, or personal benefits in return for awarding FedEx business.

If you think you may have a conflict of interest, you are required to promptly disclose that potential conflict to FedEx. Your manager will assess the situation and work with human resources and the legal department, as appropriate, for review, guidance, or action.

Unless preapproved by the Executive Vice President and Chief Financial Officer of FedEx Corporation, you may not hire any person who has been employed during the preceding three years by the independent auditor of FedEx (currently, Ernst & Young LLP).





Common situations that could create a conflict of interest for a team member include:

- Having a second job outside FedEx that negatively affects your work at FedEx.
- Working for FedEx competitors, customers, or suppliers.
- Hiring or supervising a close friend, family member, or romantic partner.
- Using FedEx property, resources, opportunities, or ideas for personal gain.
- Holding significant financial interests in or exercising control over a customer, supplier, or competitor.
- Awarding a FedEx contract to a relative or friend.
- Receiving a personal benefit from a company doing business with FedEx.

Our Code in action



My spouse wants to set up a business to bid on a contract to become a FedEx supplier. I won't work in the side business or oversee any of its operations, but I would be a part owner. **Is this a potential conflict of interest with my employment at FedEx?**



Yes. There may be a conflict. When you, your spouse, or another close personal relationship are setting up a business specifically to supply to FedEx, there will be concern about transparency, loyalty, objectivity, and your ability to put FedEx first in your decision-making. Disclose this potential conflict to your manager. Your manager will review the information, check the policy, involve human resources or the legal department as needed, and provide guidance.

Other Resources

[Global Conflicts of Interest Policy](#)

Abide by international trade controls

As a global company, we must be aware of export controls and sanctions that govern business dealings with certain countries, entities, and individuals. These rules exist to protect national security interests, enforce international laws, defend human rights, maintain peace and security, and prevent armed conflicts. Penalties for breaking sanctions can include fines, asset seizures, and prison sentences.

FedEx maintains policies and procedures to help ensure that we:

- Do not operate or provide services to individuals, entities, countries, or territories in violation of U.S. and other relevant trade sanctions.
- Screen transactions, including shipments, vendors, and other third parties, to identify people or entities on restricted or sanctioned party lists.
- Remain alert for and report red flags indicating diversion to a prohibited country or party.
- Do not deliver shipments of items that are prohibited for import or export.
- Do not transfer controlled technology, equipment, or software without required import or export authorization.

As a U.S.-based company, FedEx does not and may not take part in boycotts that are not supported by the U.S. government, such as agreements to discriminate based on race, religion, gender, national origin, or nationality, or refusal to do business with certain countries not sanctioned by the U.S. Any action of this nature can subject FedEx to substantial penalties and have a serious impact on our operations.

Regardless of where we are located, we must understand and follow all applicable export controls, trade embargoes, and economic sanctions imposed by the U.S. and governments of any country or territory where we operate.

Our Code in action



I was approached by a customer looking for information on how to send a large shipment. The customer, the consignee, the goods, and the origin and destination countries are not on any restricted list. However, I suspect they plan to send the cargo on to a sanctioned country. **Should I process this customer's shipment?**



No. If you suspect that a transaction may violate international export controls, you should pause and discuss your suspicions with the legal department.

Other Resources

[Global Export Controls Compliance Policy](#)

Compete with integrity

FedEx thrives in competitive markets. We are committed to giving customers the best value for our products and services. Antitrust and competition laws are designed to protect customers by promoting healthy competition, which results in lower prices, more choice, better quality, and greater innovation. Actions that violate antitrust and competition laws, such as agreements with competitors to fix prices, divide customers or markets, or not recruit each other's employees, are prohibited.

Agreements among competitors can lead to serious and damaging antitrust violations. Such agreements do not need to be written. They can be inferred from actions such as meetings, informal conversation, or the exchange of confidential information. We must be careful when we interact with competitors so we avoid even the appearance of an antitrust violation.

Respect consumer rights

As a trusted global delivery brand, we have an important responsibility to accurately present our products and services in the marketplace. FedEx is committed to fair, accurate, and honest sales and marketing practices. We treat our customers ethically and fairly. We earn their business and trust based on our superior solutions, excellent customer service, and competitive prices.

Our Code in action



I have friends who work at competitors. **Can I talk to them about business when we go out for dinner?**



Antitrust laws apply all the time, even at social gatherings and during informal conversations. There is no exception for friends, family, or former colleagues. Do not discuss confidential subjects like prices, customers, or competition. If other people raise these topics, stop them, leave the conversation if they persist, and notify the legal department.

Other Resources

[Global Antitrust & Competition Law Policy](#)



Safeguarding our resources

Company resources are entrusted to us so we can do our jobs and meet our work-related goals. In return, FedEx relies on us to use those resources properly. We are responsible for protecting FedEx assets, including financial and physical assets, intellectual property, and confidential information. We have a duty to report actual or suspected fraud, misuse, theft, damage, and loss of FedEx resources. The same obligation applies to customer property and the property entrusted to us by other parties.

Always exercise good judgment when using FedEx resources. Minimal personal use of certain FedEx resources (like laptops and smartphones) is generally permitted if it does not interfere with your job duties or negatively impact device or network security or resources.



There are a couple of specialized tools at work that I need to borrow to use at home. Is it OK to take them as long as I bring them back the next day?

No. You can't borrow FedEx tools or other FedEx property for personal use at home. It is important that FedEx property remain where it can be used for FedEx purposes. Even when working on site with FedEx tools or resources, it is important to remember that those materials are provided so we can do our work and not for our personal use or convenience.



I have personal files and emails on my FedEx laptop. Does FedEx have access to them?

We each have limited expectations for privacy when using FedEx equipment and networks. Where allowed by law and following our policies, FedEx may retrieve and review your FedEx laptop, tablet, and smartphone, and any information stored on FedEx servers, including all emails, text messages, and internet browsing, as reasonably necessary to accomplish the purposes set out in those policies.

We must act with care to protect FedEx intellectual property. Intellectual property refers to a broad category of intangible assets. Some, like patents, copyrights, logos, trademarks, software, and public disclosures, are publicly available but may only be used in certain ways. Other intellectual property, like trade secrets, business strategies, sales plans, and “know-how,” are typically internal and are sensitive or confidential.

Our intellectual property contributes to our competitive advantage. To keep the value of our intellectual property, we must protect it and ensure it is used properly. Safeguard our intellectual property just like you protect our other assets.

We also must respect and protect the intellectual property entrusted to us by customers, suppliers, and other third parties. For example, we must not misappropriate or reproduce copyrighted material without the owner's permission. Similarly, we distribute software only as allowed by the related license agreements. Any use of open-source software must be preapproved by our information security department. We may not download and store unlicensed or illegal copies of software or content.

Protect confidential information

We must all do our part to protect FedEx confidential information. Confidential information is any nonpublic information about FedEx business, team members, customers, or suppliers. Confidential information includes business plans, pricing, costs, and internal financial information. It also includes personal data, research and development, technology, marketing plans, and any other competitive information.

We must use confidential information appropriately. We may disclose it to other FedEx team members or third parties only if they have a legitimate, business-related need to know. Even team members who leave FedEx are bound to safeguard FedEx confidential information after they depart. Similarly, you must not bring confidential information from any prior employers to your work at FedEx.

Our Code in action



How can I keep FedEx information safe when I work on my laptop at a café or in an airport?



When you are working in a public location, be aware that others may be able to see your screen. Don't open confidential materials where others may see them. Only connect to protected Wi-Fi networks you know and trust. Avoid using open access points, such as at cafes or airports, and always use a VPN with public Wi-Fi.



To help protect confidential information:

- Be careful when discussing confidential information in public places where conversations may be overheard, such as restaurants, public transportation, or elevators.
- Avoid reading documents with confidential information in public places, such as airplanes or trains, and do not discard them where others can retrieve them.
- Keep your laptop, tablet, and smartphone locked and passwords secure.
- Do not leave your laptop unattended in unsecure places such as a parked car, conference center, or café.

Safeguard data

FedEx is committed to safeguarding the privacy of personal information put into our care by our team members, customers, and other third parties. Personal data is any data that can be used directly or indirectly to identify a specific person, such as name, address, social security number, email address, or telephone number.

We follow all applicable laws and regulations about the collection, use, transfer, and disclosure of personal data, including provisions about fair

and legitimate use, purpose specification, collection limitation, deletion, data quality, security safeguards, and transparency.

We have implemented robust procedures to protect personal data from unauthorized access, loss, misuse, alteration, and disclosure. If you discover or suspect a data security incident, a cyberattack, or a possible breach of personal data, immediately notify your manager, the legal department, and the information security team. Act quickly to prevent more harm.

Our Code in action



Someone called me about a misdelivered package. They have the tracking number but are asking me for other information about the actual recipient, like their name and address. **Can I give them that information since they have the tracking number?**



No. Providing the caller with another recipient's personal data may violate FedEx policy and may violate data privacy laws.



Maintain information security

We must protect customer, employee, and company information and resources. We support information security by keeping corporate information confidential regardless of how it is created, distributed, stored, or discarded. We should only access the information, resources, and locations necessary to do our work.

We must limit personal use of FedEx resources so as not to impact the business or compromise security. We also must manage FedEx hardware, software, and mobile devices as directed. Replacing or refreshing these assets when required will ensure up-to-date security measures are in place.

Contact dataprivacy@fedex.com for privacy related requests.

Other Resources

[Data Privacy](#)
[Information Security](#)

Do not trade on insider information

It is illegal to trade in a company's securities while in possession of material, nonpublic information relating to that company. Some FedEx team members may have access to highly confidential information belonging to FedEx or another company, such as a major customer or supplier, which could affect the stock price if made public. Such information is called "material inside information." We must be careful to protect material inside information and never use it for personal gain.

Before material inside information becomes public, we may not disclose it to anyone who does not have a business need to know it, including family and friends. We also may not trade, directly or indirectly, in securities of companies that are the subject of the information. This means we can't make trades ourselves, and we also may not advise our friends or family or anyone else to trade, even if we withhold details.

Other Resources

[Insider Trading](#)

Keep accurate business records

FedEx generates a large amount of electronic and paper documents every day. All team members are involved with creating and keeping FedEx records. We must all ensure FedEx records are accurate, truthful, complete, reliable, and secure. Our records must be an honest representation of facts and should never include false or misleading information.

We are committed to providing full, fair, accurate, and timely disclosures in our public communications and in the reports we file with government authorities, including the U.S. Securities and Exchange Commission.

Business records should be kept and disposed of properly, based on applicable recordkeeping requirements, laws, and business needs. Do not destroy any FedEx record that you are required to keep.

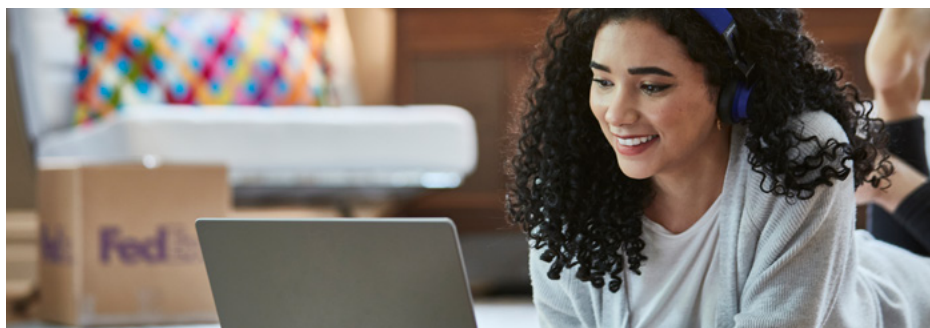
Regularly check your applicable record retention schedules to ensure compliance. Never alter or destroy a record if you have been notified by the legal department that it may be needed for a pending lawsuit or a government investigation.

Fight external and internal fraud

We are committed to eliminating waste, fraud, and abuse from FedEx accounts and maintaining the accuracy of FedEx accounting records. We require open, honest, and fair dealing with each other and our customers, suppliers, and competitors. We must follow the FedEx system of accounting and internal controls to ensure that FedEx accounts are correct and used only for legitimate business expenses or expense reimbursement.

All FedEx financial transactions, big or small, should be properly documented. Unrecorded or “off-the-books” funds or assets are prohibited. Recording false, misleading, or incomplete information impairs our ability to make good decisions, undermines trust in FedEx, and may be illegal.

We must ensure that only authorized people execute transactions on behalf of FedEx or have access to FedEx assets or systems.



If you become aware of financial fraud or questionable accounting, internal controls, or auditing related to FedEx, you must report it. Examples of these problems include:

- Fraud or deliberate error in preparing or auditing any FedEx financial statement.
- Fraud or deliberate error in recording and keeping FedEx financial records.
- Noncompliance with FedEx internal accounting controls.
- A false statement about a matter contained in FedEx financial records, financial reports, or audit reports.
- Withholding of information that would provide a full and fair report of the financial condition of FedEx.
- Fraud in possession or use of company or customer resources.

This type of report should be made to the FedEx Alert Line or the FedEx Corporation General Counsel.

Other Resources

[Fraud Awareness and Prevention](#)





Committing to do good

We understand the role we play in the global economy and the global environment. We're not just here to benefit, we're here to contribute. We make connections, we seek ways to protect our planet, and we do things the right way. We help communities thrive.

Pursue environmental stewardship and sustainability

FedEx recognizes our activities have an impact on the environment. The long-term health of our business is connected to the health of our planet. We are committed to conducting business activities responsibly and sustainably. We comply with national, state, and local laws where we operate that regulate air or surface vehicle emissions, water quality, solid and hazardous waste disposal, and the prevention of spills or releases.

We strive to continually improve our environmental management. As part of our ongoing efforts to promote sustainability, we evaluate the environmental impacts of FedEx operations and packaging and reduce them where possible. We integrate environmental considerations into daily operations and business decision-making processes. This includes sourcing and implementing solutions that will help reduce our environmental footprint.

We have an ambitious goal to achieve carbon-neutral operations globally by 2040. Our path to carbon-neutral operations includes investing in vehicle electrification, sustainable fuels, fuel conservation, aircraft modernization, and renewable energy for our facilities.



Demonstrate FedEx cares

FedEx Cares focuses on simultaneously meeting social and business goals. We make our most significant investments in areas where we can address material issues and apply our unique business capabilities. FedEx Cares has three major giving portfolios: Delivering for Good, Global Entrepreneurship, and Sustainable Logistics. Common to these three is our commitment to diversity, equity, and inclusion; and to team member volunteerism.

- **Delivering for good** - We lend our global network and logistics expertise to nonprofits with mission-critical needs and to communities impacted by crises and natural disasters.
- **Global entrepreneurship** - Our work helps strengthen small businesses owned by women and people of color by connecting them to resources, training, and capital.
- **Sustainable logistics** - Our commitment to accelerating innovations like carbon capture and electric vehicles reduce the environmental impact of the logistics industry.
- **Diversity, equity, and inclusion** - Everything we do supports our pursuit to create more equitable and just communities.
- **Volunteering** - Team members volunteer their time and expertise to enhance our impact and deepen our relationships in the community.

Other Resources

fedexcares.com

Follow our rules for donations and political activities

At FedEx, we are free to support and take part in the political process through personal contributions, campaigning, or volunteering personal time to candidates or organizations. These activities are strictly a matter of personal choice. They may not be conducted on FedEx property or time or involve the use of any FedEx resources, including money, equipment, vehicles, computers, printers, or supplies.

We may not make or pledge political contributions on behalf of FedEx. If you are a U.S. citizen or U.S. permanent resident, you may choose to take part, or not to participate, in the FedExPAC – FedEx Corporation Political Action Committee. All such contributions are strictly voluntary and are not tax-deductible.

Concluding advice

Our Code describes our commitment to ethics and compliance and serves as a guide for all team members. Our goal is to provide you with the information and tools you need to perform your job and keep the trust of team members, customers, and the communities where we do business.

If you find yourself in a situation where you are unsure of what to do, ask your manager, human resources, security, the legal department, or the corporate integrity & compliance department at integrity@fedex.com.

By acting ethically and following the principles in the Code, we deliver the Purple Promise and help ensure our continued shared success.

Integrity matters.

