

3.22 Whistleblowing

1. Policy

This Policy seeks to ensure that proper tools, processes and protection mechanisms are in place for Team Members and Third Parties to report information on actual or potential breaches falling within the material scope of the [EU Whistleblowing Directive](#) and its transposition into Danish Law. It does not limit the responsibility of FedEx Team Members to speak up and report other types of suspected breaches as referred to in the [FedEx Code of Conduct](#) and the [FedEx Global Policy on Reporting Concerns](#).

In the event of any contradiction or conflict between the terms of this Policy and the provisions of the applicable local law and regulation, the latter shall prevail.

2. Scope

This Policy applies to FedEx Team Members and Third Parties.

3. Definitions

- **Central Case Administrator:** a representative of the Europe Legal Department authorized to receive reports, acknowledge their receipt and initiate or perform diligent follow-up action.
- **Corporate Integrity and Compliance:** the department that ensures that the FedEx Alert Line and surrounding processes are fit for purpose from a functionality and legal / privacy perspective.
- **Danish Law:** Lov om beskyttelse af whistleblowere – Law no. 1436 of 29.06.2021.
- **Investigative Function:** the function that is considered best placed to investigate a report.
- **Local Case Administrator:** a representative of the local Legal or Human Resources Department authorized to receive reports, acknowledge their receipt and initiate or perform diligent follow-up action.
- **Regional Case Administrator:** a representative of the Regional Legal Department authorized to receive reports, acknowledge their receipt and initiate or perform diligent follow-up action.
- **Report:** the oral or written communication or information on breaches in scope of this policy.
- **Reporting Person:** a natural person who reports or publicly discloses information on breaches acquired in the context of his or her work-related activities.
- **Team Member:** every officer, director, manager and employee of FedEx.
- **Third Party:** any individual, including former team members, who acquired information on actual or potential breaches in a work-related context. This includes former, current or future: agents; temporary agency staff; job candidates; contractors; consultants; freelance workers; service providers; subcontractors; suppliers; distributors; business partners; shareholders; persons in administrative, management or supervisory bodies; volunteers; (paid or unpaid) trainees; any persons working under the supervision and direction / management of a contractor, subcontractor or supplier; or any other person with whom FedEx did, does or may do business.

4. Guidelines

4.1. Types of breaches in scope of this Policy

This Policy applies to the reporting of information on actual or potential breaches falling within the material

scope of the [EU Whistleblowing Directive](#) and its transposition into Danish Law. These include, for example, breaches of EU Law (e.g. breaches in relation to a tender issued by a public authority, money laundering and terrorist financing, protection of the environment, public health or food safety); breaches affecting the financial interests of the EU (e.g. fraud, corruption and any other illegal activities affecting the financial interests of the European Union); breaches relating to the EU internal market (e.g. competition law infringements); and a variety of other matters relating to serious offences or other serious matters. A comprehensive overview of all breaches in scope of this Policy can be found [here](#) (see § 1).

4.2. Channels for internal reporting

Actual or potential breaches governed by this Policy can be reported in writing, orally, or both. Reports can be made through one of the following channels:

4.2.1. The FedEx Alert Line

The FedEx Alert Line is a service that FedEx contracts for through an independent vendor. Reports to this service may be made by calling a toll-free telephone number or by completing an online questionnaire. Both the telephone hotline and online reporting tool are available 24-hours a day for use by FedEx Team Members and Third Parties.

Contact details:

Phone: 80-83-07-54
Online: fedexalertline.com

4.2.2. Your Local Reporting Channel

A Reporting Person may also choose to reach out directly to the local reporting channel:

Contact details:

Voice mail: +45 3248 1412
E-mail: DK.whistleblowing@fedex.com

FedEx provides Reporting Persons with the opportunity to reach out to the internal reporting channel of their choice. If there is reason to believe that a member of the local Legal or Human Resources department may be implicated in a suspected breach or may not be impartial, the Reporting Person is advised to make a Report through the FedEx Alert Line (or vice versa).

4.3. Anonymous Reports

The FedEx Alert Line allows for anonymous reporting and Reporting Persons may request to remain anonymous when making Reports through the local reporting channel. FedEx strictly prohibits any attempt to discover the identity of Reporting Persons who request to remain anonymous. However, we encourage you to reveal your identity as it is often difficult to investigate certain anonymous Reports. Providing contact information also allows us to communicate with (and provide updates to) the Reporting Person.

4.4. Departments authorized to receive Reports

Reports submitted through the FedEx Alert Line are received and administered by a Regional and/or Central Case Administrator. Reports submitted through the local reporting channel are received and administered by a Local Case Administrator.

4.5. Follow-up

Following receipt of a Report, the relevant case administrator will initiate or perform the necessary follow-up activities. These may include, amongst other:

- verifying the Report to assess whether it is in scope of this Policy;
- asking the Reporting Person for further information, where needed;
- aligning internally with other case administrators, with members of the FedEx Legal Department or the FedEx Corporate Integrity and Compliance Department, or with the relevant Investigative Function;
- assigning the matter for further investigation;
- providing feedback to the Reporting Person; and/or
- closing the matter.

A reported breach may be assigned for further investigation to the relevant Legal, Security or Human Resources Department; the Internal Audit Department or any other internal or external party that is authorized and deemed appropriate to investigate the reported breach in an independent and objective manner.

Reporting Persons that report through a local reporting channel and object against (1) sharing their identity with the regional or central level and/or (2) having the reported breach investigated at a regional or central level, are requested to clearly state this objection to the Local Case Administrator.

4.6. Feedback to the Reporting Person

The Reporting Person will be provided with feedback prior to and following the investigation. Where an investigation takes more than 3 months to complete, the Reporting Person will be provided with periodic updates on the progress of the investigation.

4.7. Confidentiality

It is the responsibility of all individuals involved in the receipt and/or follow-up of a Report – including those Team Members that receive updates on reported breaches as part of their role and responsibilities within FedEx – to protect the identity of the Reporting Person and of any other party mentioned in the Report, including the person(s) concerned.

The identity of the Reporting Person, nor any other information from which the identity may be directly or indirectly deduced, must not be disclosed to anyone beyond the individuals described above without the explicit consent of the Reporting Person, unless there is a necessary and proportionate obligation to disclose imposed by Union or national law in the context of investigations by national authorities or judicial proceedings, including with a view to safeguarding the rights of defence of the person(s) concerned.

4.8. Processing of personal data

Individuals involved in the receipt and/or follow-up of a Report must ensure that the processing of personal data is compliant with GDPR. They must not collect personal data which is manifestly not relevant for the handling of the Report. If accidentally collected, such data must be deleted without undue delay.

4.9. Recordkeeping

FedEx will keep records of all Reports received under this Policy. Recording of personal data in these records will be kept to a minimum, and Reports will be stored for no longer than necessary.

FedEx Corporate Integrity and Compliance will take the necessary technical and organizational measures to limit the number of individuals having access to the above records, and to prevent access to these records

by non-authorized individuals. It will further ensure that legally binding agreements are in place with external vendors having access to the FedEx Alert Line and related case management system to ensure that the protection mechanisms and safeguards listed in this Policy are being maintained.

4.10. Non-retaliation

FedEx prohibits retaliation, including threats or attempts of retaliation, against anyone who reports an actual or potential breach in good faith. Reporting in good faith means that the Reporting Person had reasonable grounds to believe that the information on breaches reported was true at the time of reporting and that such information fell within the scope of this Policy.

FedEx also prohibits retaliation against (1) any person who assisted a Reporting Person in the reporting process, (2) any person who assisted in an investigation into a Report, (3) third persons who are connected with the Reporting Person and who could suffer retaliation in a work-related context, and (4) legal entities that the Reporting Person owns, works for or is otherwise connected with in a work-related context.

Any Team Member who is found to have breached this non-retaliation principle, or to have threatened or attempted to do so, will be subject to discipline, up to and including termination.

4.11. Procedures for external reporting

While Reporting Persons are encouraged to first use internal reporting channels, they have the option of reporting breaches of EU Law and matters that fall within the scope of the local transposition of the EU Whistleblowing Directive to Competent Authorities and, where relevant, to institutions, bodies, offices or agencies of the European Union.

In Denmark, the following bodies are authorized to receive external reports:

- Danish Data Protection Agency / Datatilsynet: [Whistleblowerordning \(datatilsynet.dk\)](https://www.datatilsynet.dk)
- Ministry of Justice / Justitsministeriet: [Whistleblowerordning | Justitsministeriet](#)
- Ministry of Defence / Forsvarsministeriet

5. Policy Related Documents

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

Document History

Date of revision	Regional (R) Localised (L) Country (C)	Version	Author(s)	Approved by (name and position)	Summary of changes
1 December 2022	C	1.0	Harald Haelterman Manager Legal Compliance & Integrity Annette Lilja Senior Legal Counsel II	Leendert Creyf VP Legal Europe	Launch of new policy document

31 January 2023	C	1.0	<p>Harald Haelterman Manager Legal Compliance & Integrity</p> <p>Annette Lilja Senior Legal Counsel II</p>	Sara Mertens MD Leadership, Talent and Employee Experience	Launch of new policy document
23 July 2024	C	2.0	<p>Georgia Tzima Manager HRS</p> <p>Audrey Lim HR Capabilities & Compliance Advisor</p>	Andrew McDonald Manager HR Capabilities & Compliance	Update of Alert Line Number