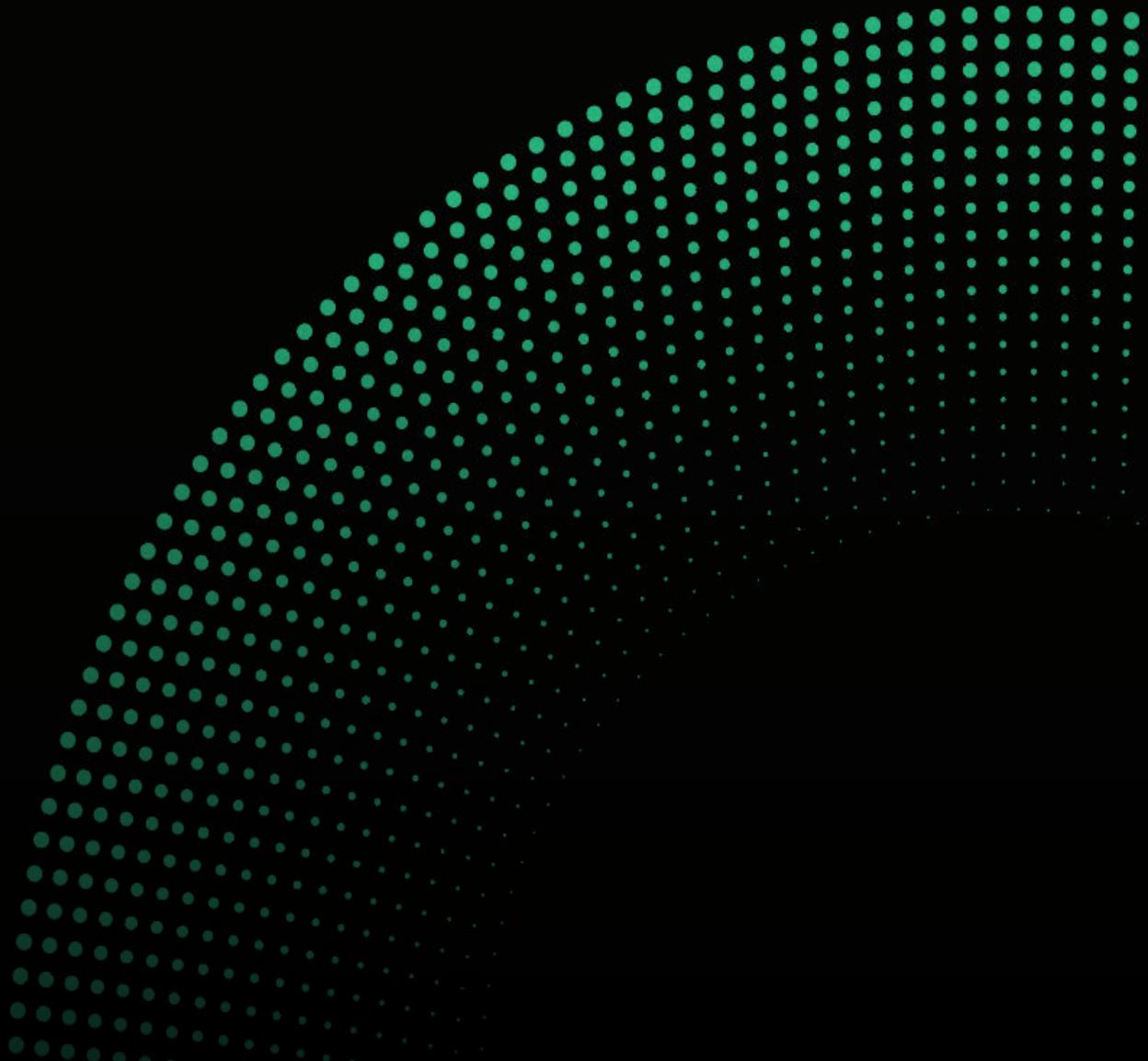


RXO

Code of Business Ethics

Effective December 2023



A message from Leadership

DOING THE RIGHT THING

At RXO, success relies on our employees' unshakeable commitment to always doing the right thing. As an industry leader, we recognize and take seriously our responsibility to set the standard for lawful and ethical business conduct. Sound individual decision-making forms the foundation of our collective culture of excellence and ensures that we operate with impeccable integrity at every stop.

Please familiarize yourself with our Code of Business Ethics and related policies. You'll see that the expectations are consistent for all of us, regardless of position or level of authority. The Code is a compass: it will help you think before you act, follow the law and navigate situations successfully. If a situation arises where the right choice is unclear, always stop and ask for guidance.

Finally, our company relies on you to report any suspected misconduct in good faith. You can do this without fear of retaliation by contacting your supervisor, human resources manager or the Ethics and Compliance team, or by calling the Ethics Hotline.

Thank you for your rock-solid commitment to representing RXO with the upmost honor and integrity. By always following the Code, you uphold and strengthen our reputation, safeguard our future and ensure our success.



Drew Wilkerson
Chief Executive Officer
RXO



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Our Commitment: Do Business the Right Way

Our mission is to deliver results. This requires us to perform to the highest standards of business conduct at all times. We will not compromise our values to meet commercial objectives. Our values are critical to our success.

Our Code is a blueprint of the company’s business standards. All RXO employees, officers and directors must comply with the Code, as must other parties acting on RXO’s behalf, to the extent it is consistent with local law. These standards apply any time you are representing RXO or engaged in activities that could have an impact on RXO’s business or reputation.

In addition to the Code, RXO has a number of Business Ethics Policies that govern our conduct. Some RXO locations and business units also have separate policies that expand on these requirements. In addition to the Code, you must understand and comply with these other policies.

Management’s Commitment

RXO’s management is committed to leading by example in ways that reflect our company values. This includes responding in a timely manner to employee concerns, addressing compliance risks, and providing reporting resources to ensure potential violations of company policy or law are identified and addressed.

Management—and the company overall—will not tolerate retaliation against anyone who has, in good faith, reported concerns or cooperated with ethics or compliance inquiries.

Resources Available to You

RXO’s Code and related policies are designed to help you resolve ethical and legal issues. If you are still unsure

about an issue after referring to the Code and policies, ask yourself these four questions: Does it feel like the right thing to do? Does it comply with the law and company policy? Would I feel comfortable if others knew about it? Would I want to read about it online or see it in the news?

If you cannot answer yes to all of these questions, stop and seek guidance from your supervisor or [Ethics and Compliance](#). Additional resources are available to you at the end of this document.

Consequences of a Violation

You agree to comply with the Code, all company policies and applicable laws, rules and regulations. Failure to comply with the Code, company policies or applicable laws, rules or regulations carries consequences, including possible termination of employment, or other disciplinary actions. Some violations may also be subject to civil or criminal penalties.

Our Responsibilities

We all share a responsibility to:

- Act with integrity in all of our business dealings, large and small.
- Treat each other with dignity and respect.
- Comply with all applicable policies, laws and regulations.
- Uphold our commitment to this RXO Code of Business Ethics (our “Code”).



Respect, Equal Opportunity and Safety in the Workplace

We are committed to a work environment where respect and diversity are valued and safety is paramount. In addition, we comply with all laws that govern fair employment and labor practices.

Equal Employment Opportunity

RXO provides equal employment opportunities to all employees and applicants. We make employment decisions without regard to race, color, age, gender, religion, national origin, mental or physical disability, medical condition, family or medical leave status, marital status, sexual orientation, gender identity, or any other basis protected by law. This includes decisions related to hiring, placement, promotion, termination, discipline, leaves of absence, compensation, benefits and training.

Zero Tolerance for Discrimination, Harassment and Retaliation

RXO does not tolerate harassment or discrimination on the basis of any protected category or class. You must not engage in any abusive, harassing or offensive conduct, whether verbal, physical or visual.

If you experience or become aware of any conduct that makes you uncomfortable, you should contact your supervisor, your Human Resources representative or [Ethics and Compliance](#).

RXO also strictly prohibits retaliation against employees who raise concerns, report potential violations of laws or policies, or participate in a legal or compliance investigation.

If you have any questions regarding our company's policies prohibiting harassment, discrimination, and retaliation consult RXO's Zero Tolerance for Discrimination, Harassment and Retaliation Policy.

Workplace Safety

RXO is committed to maintaining a safe work environment. All work must be performed in

accordance with health and safety regulations and [company policies](#). Immediately alert your supervisor to hazardous conditions in the workplace, vehicle accidents, work-related injuries or illnesses, violations of company policy and all other safety issues.

Drugs and Alcohol

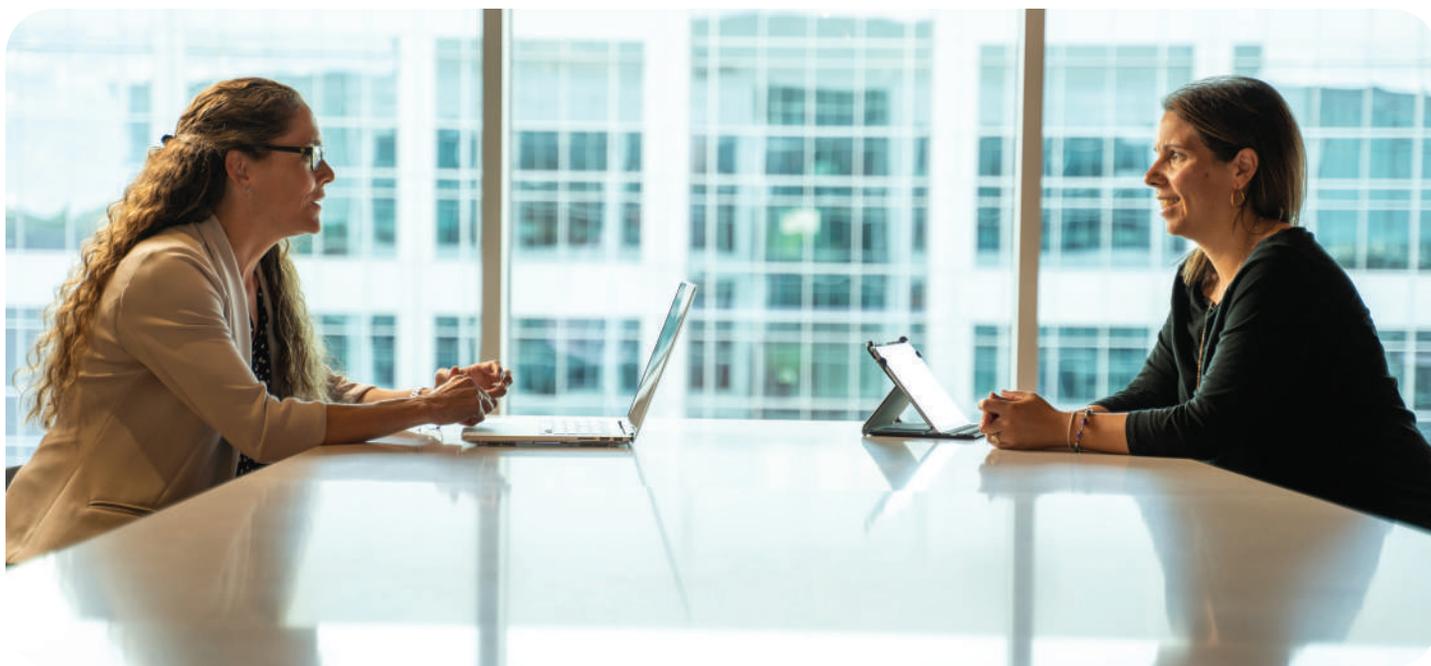
RXO maintains a drug-free and alcohol-free work environment. You may not use or possess alcohol on company premises, except at sponsored company functions with appropriate executive pre-approval. You may not use, possess or distribute illegal drugs, or abuse prescription drugs, while on company time or property.

Workplace Violence

RXO does not tolerate violence in any form. If you witness or experience violent or threatening behavior, report it to your supervisor, Human Resources representative or [Ethics and Compliance](#). If someone is in immediate danger, contact law enforcement.



Total Integrity in Business Dealings



We are committed to maintaining the trust of customers and others in our marketplaces by acting with integrity, competing fairly and protecting confidential information.

Honest and Accurate Information

RXO deals fairly and in good faith with our customers, suppliers, competitors, and employees. You may not take advantage of anyone through unfair dealing practices.

Third-Party Information

RXO does not tolerate the improper collection or use of confidential or proprietary information related to our markets, customers, competitors or any other third party. All such information must be collected through lawful means, and must be properly safeguarded from unauthorized disclosure or use.

If you become aware of confidential or proprietary information about a competitor or other third party through a prior employer or other non-public source, you are not permitted to use the information in connection with RXO's business or to disclose it to any company representative. You cannot bring the information onto RXO's premises, including electronic

systems used by RXO, or use it in any way in performing your duties or other company business.

Do not use the name, trademark or logo of another company without written permission from an authorized representative of that company. Do not reproduce, distribute or alter copyrighted materials owned by others.

Antitrust and Fair Competition Laws

RXO complies with all antitrust and fair competition laws and does not tolerate anti-competitive activity. You cannot enter into any agreement or arrangement to limit competition or gain an improper advantage.

If you have marketing, sales, pricing, or purchasing responsibilities, or if you have contact with competitors, it is particularly important for you to be aware of antitrust and fair competition considerations.

For more information about antitrust and fair competition requirements, consult RXO's Antitrust and Fair Competition Policy.



Doing Business with the Government

RXO complies with all laws and regulations that govern dealings with federal, state, provincial, county and local governments, including entities working on behalf of a government, or owned or controlled by a government.

If you are involved in seeking government contract work for RXO, it is particularly important for you to understand and observe all applicable rules. If you have questions or concerns regarding our government contract obligations, contact [Ethics and Compliance](#) or the internal legal counsel for your location or business unit.

Anti-Bribery and Anti-Corruption

RXO does not tolerate bribery or corruption in any form, directly or indirectly, whether doing business with a government entity, commercial enterprise or individual. You cannot make, authorize, offer, promise, or accept bribes, kickbacks or gratuities; this includes indirect payments to third parties where there is reason to believe that even a portion of the payment will be offered to someone else for an improper purpose. RXO only does business with third parties that share our commitment to conducting business ethically and with integrity and that have passed RXO's risk-based due diligence review, as outlined in the RXO Third Party Assessment and Due Diligence Policy.

There are specific rules that apply when RXO employees are interacting with government officials, as discussed in more detail in the RXO Anti-Corruption Policy. For example, no gifts or entertainment may ever be provided

to government officials by RXO, as discussed in more detail in the Gifts and Entertainment section of this Code.

Government officials are broadly defined as any person, regardless of their rank or position, working for (1) a government agency or department, in any branch of government (executive, legislative, judicial, military, law enforcement) at the federal, state, or local level, or (2) a government-owned or controlled entity or business, including entities such as state-owned air carriers, shippers, or utility providers. This also includes

When dealing with a government entity or official, you may not:

- Seek or obtain confidential information about the government's selection process or a competitor's proposal;
- Provide anything of value to a government employee including meals and entertainment;
- Talk to a government employee about possible employment opportunities;
- Make false or misleading statements about RXO's services or capabilities;
- Substitute goods or services; or
- Use government property for any purpose other than the intended purpose.



any person or entity acting on behalf of a government or government-owned or controlled entity, a public international organization (e.g., the Red Cross, the United Nations, or the World Bank), a political party, or a candidate for political office.

Because determining who is and is not a government official is not always easy, you should consult the RXO Anti-Corruption Policy for additional details or contact [Ethics and Compliance](#) for any questions or concerns.

Political Activities and Contributions

Political Activities by Employees

RXO values the right of our employees to participate in the political process. RXO employees are welcome to do so in a variety of ways, including by making personal contributions or by volunteering personal time to campaigns, organizations or initiatives.

RXO policy requires employees to comply with all federal laws and related regulations regarding time spent during working hours in support of or opposition to

federal candidates and committees. Employees may not use their position with the Company to coerce or pressure other employees to make contributions or to support or oppose any political candidates, elections, or ballot initiatives.

Any political activity (including use of an RXO title or logo) that would suggest RXO's support requires pre-approval by [Ethics and Compliance](#).

Employees who wish to become a candidate for political office may not use their affiliation with RXO or their role as a feature of their political campaigns. Before beginning a campaign for political office, an employee should carefully consider and discuss with their manager and Ethics and Compliance the potential impact of such activity and subsequent government service to proactively identify any potential conflicts of interest.

Corporate Political Activity

Many jurisdictions prohibit corporations from contributing to candidates for office but permit other forms of political activity. RXO may engage in the political process where legal and appropriate under applicable law. Any such proposed participation would be reviewed by Ethics and Compliance to ensure adherence to all legal requirements and ethical standards and would be based on the interests of RXO and its shareholders.

Political Contributions

RXO employees may make political contributions with their own funds and in accordance with their own political preferences. RXO will not reimburse or otherwise compensate employees for their political contributions.

Employees may not directly or indirectly provide any company funds or assets to any political party or candidate without written authorization from [Ethics and Compliance](#). Employees involved in government procurement activity may not make any private political contributions in connection with government procurement activity without written authorization from [Ethics and Compliance](#). Employees may not make, or offer to make, any political contribution, even from personal

Total Integrity in Business Dealings

funds, to obtain or retain business or any other improper advantage on behalf of RXO.

Compliance with Insider Trading Laws

In the course of your duties with the company, you may become aware of material non-public information about RXO or another company with which RXO does business. For example, you may hear or see undisclosed financial results or information regarding the company’s strategic plans. If you become aware of material non-public information, you cannot disclose this information or use it for personal benefit or for the benefit of someone else.

You cannot trade in company securities while in possession of material non-public information about RXO. You must follow these same principles with respect to information you learn about any other company,

including companies with which RXO does business. You also cannot discuss material non-public information, including but not limited to unpublished financial results, with the press without approval from Ethics and Compliance. Violations of insider trading laws may result in extremely serious penalties including fines, imprisonment, disgorgement, civil penalties and termination for cause.

The RXO Securities Trading Policy, which is available at [Ethics.RXO.com](https://ethics.rxo.com), addresses trading in company securities by employees. If you have questions about trading company securities, contact Ethics and Compliance at Ethics@rxo.com.



A Good Citizen to Communities Worldwide

We are committed to maintaining a global standard of integrity in all countries where we operate. We believe in fair trade practices, in human rights, in sustainable business practices that mitigate potential damage to the environment and in doing business without corruption.

International Trade Compliance

As a global company, RXO is committed to complying with all laws and regulations governing international trade.

RXO does not permit the export or import of goods, services or data without appropriate authorization. When shipping under a government authorization, you must comply with all terms and conditions of the authorization, and you cannot divert shipments to a place or person not included in the authorization. To ensure that the company can comply with government reporting requirements relating to international trade, you must properly document all export and import transactions.

Unless you have received appropriate government authorization, you must not do business with, or for, any embargoed or sanctioned country, or any party subject to a debarment or economic sanctions. In addition, you must not participate in any boycotts not authorized by U.S. law, such as restrictive contract provisions aimed at limiting trade with Israel. If you become aware of any boycotts or other restrictive provisions, immediately contact the Trade Compliance Team at TradeCompliance@rxo.com. It is your responsibility to know your customer and to ensure that you comply in these matters.

For more details, employees should review the RXO Trade Compliance Policy or contact TradeCompliance@rxo.com.

Human Rights

RXO is committed to conducting business in a manner that respects the human rights and dignity of all people. We do not tolerate any conduct that contributes to, encourages, or facilitates human trafficking, child labor, forced or compulsory labor, or any other human rights abuses.

Environmental Laws

RXO conducts its business in a manner that complies with all applicable environmental laws. This includes ensuring that all hazardous materials, waste or pollutants are properly labeled, stored, handled, transported, used and disposed of. Environmental rules are often complex and vary by location – if you have any questions regarding environmental requirements, contact [Ethics and Compliance](#) or the internal legal counsel for your location or business unit.





Protection of Company Assets

We are committed to safeguarding the integrity of RXO's assets, including the information we receive from or provide to shareholders, regulators, business partners and other third parties. We avoid conflicts of interest and we do business on our merits.

Company Resources

It is your responsibility to ensure that company property, facilities, equipment and information are used appropriately. In addition, non-tangible company resources such as the RXO name or your time as an employee cannot be used in connection with non-company activities.

If you have access to company telephones, computers, mobile devices, networks, internet access, e-mail services, or other electronic resources, you may use these resources only for legitimate business purposes. Incidental personal use is permitted so long as it does not interfere with your work, is not illegal, is not used for personal gain, and does not conflict with or violate the company's interests.

If you leave the company, you must return all company property and information, including documents, data, phones, computers and other business equipment. You agree not to access or attempt to access any electronic device, system, database, server, portal or network of

RXO after your employment ceases. You further agree not to tamper with, alter, delete or destroy any company property, documents, records or data contained in any location, including but not limited to any information contained on any company-provided computer or electronic device, system, database, server, portal or network, including but not limited to re-setting electronic devices to their default settings.

Confidential and Proprietary Information

RXO rigorously protects its confidential and proprietary information from unauthorized use or disclosure. This includes information about the company's strategies and operations, business plans, employees, customers, suppliers, financial status, trade secrets, or any other information unavailable to the public. You may not use confidential or proprietary information for any purpose other than the purpose for which it is maintained by the company.

Your obligation to safeguard the company's confidential and proprietary information continues to be in effect after your employment with the company ends. If you leave RXO, you may not use or disclose confidential or proprietary information that you obtained during the course of your employment or engage in activities that would result in the inevitable disclosure of RXO's confidential or proprietary information.



Notwithstanding the obligation to protect and not disclose company confidential or proprietary information stated here and in other RXO policies, an individual will not be held criminally or civilly liable under trade secret laws for the disclosure of trade secrets in confidence to government officials or to an attorney when disclosed solely for the purpose of reporting or participating in the investigation of a suspected violation of law. Further, an employee who files a lawsuit against his or her employer for retaliation against the employee for reporting a suspected violation of law may disclose trade secrets to his or her attorney and in litigation as long as the trade secret information is filed under seal.

Personal Information

RXO properly uses and protects personal information that it collects or maintains. Personal information is defined as information in any form that, on its own or in combination with other information, can be used to identify an individual.

You must safeguard personal information. The release of personal information, whether inadvertent or intentional, may need to be reported to government authorities; therefore, you are required to notify [Ethics and Compliance](#) if you suspect that any personal information has been compromised.

Business Records

Each RXO employee is responsible for ensuring that business records of all types – including expense reports, invoices, time sheets, attendance records, contract documentation and other records – accurately represent RXO's operations, business dealings and financial results. You must retain all business records in accordance with company policy and applicable legal requirements. You must not alter, falsify or otherwise tamper with any business record.

Protection of Company Assets

Public Reports

Our company’s senior financial officers must ensure that all financial information disclosed in public communications and in periodic reports with the U.S. Securities and Exchange Commission is complete, accurate, timely and understandable. Persons responsible for preparing such documents must ensure that all accounting records, and the reports produced from such records, fairly and accurately represent the transactions to which they relate. These records and reports must include reasonable detail and be supported by appropriate documentation. If you become aware of anything in the company’s accounting records or reports that is false or misleading, inform [Ethics and Compliance](#) immediately.

Contracting Authority and Delegations of Authority

Only certain employees of RXO are authorized to sign official company documents or commit the company to a contract or other transaction. If you do not have such authority, you may not bind the company to any obligations.

If you are authorized to sign official company documents or commit the company to obligations, you must act within the limits of your authority and accurately document any contract that you sign on behalf of RXO. Before making any business or financial commitment on behalf of RXO, you must verify that you have the proper authority by referring to the company’s Delegation of Authority Policy. Certain locations or business units may have additional, more restrictive, authority and approval requirements. When applicable, these more restrictive requirements must also be followed.



Conflicts of Interest

Potential Conflicts of Interest

We follow company policy and the law to guard against conflicts of interest in our business dealings. Conflicts of interest arise when your personal interests, or the interests of your friends or family members, potentially interfere with your ability to make impartial business decisions on behalf of the company. You must disclose all potential conflicts of interest to [Ethics and Compliance](#) at Ethics@rxo.com so RXO can take appropriate measures to protect you and the company.

Some conflicts are clear and always prohibited, such as using your position at the company for improper personal gain. Other situations may be less obvious, such as having the company do business with a

company owned by a friend or family. If you are unsure about a potential conflict of interest, contact [Ethics and Compliance](#) for advice. Below are some examples of common conflicts of interest.

Financial Interests in Competitors, Customers and Suppliers

As an RXO employee, you are not permitted to have a financial interest in a privately owned company that competes with RXO. You may own a small percentage (not to exceed 1%) of stock in a publicly traded company that is a competitor, supplier or customer to RXO. Additional limitations and restrictions may be applied to the company's senior officers.



Conflicts of Interest

Outside Employment and Other Activities

You must act in the best interests of the company. It is your responsibility to ensure that any non-RXO employment or other activities do not violate existing RXO commitments or relationships with a competitor, customer, supplier or other third party.

You may not work for a competitor in any capacity while employed with RXO or engage in other outside employment that interferes with your assigned company duties or competes with the company's business interests. Employees who wish to engage in any additional employment must submit a written request to their manager and HR explaining the details of the additional employment. The additional employment is subject to HR approval, which can be revoked at any time. You may not work in any capacity for a customer, supplier or other business partner of the company unless you obtain written approval from your manager, HR, and [Ethics and Compliance](#). To the extent you have an agreement with RXO that provides further restrictions or requirements, including post-employment obligations, you are also bound by the terms of all such agreements.

In addition, you are not permitted to provide information or services to "expert network firms." These firms seek industry sources to arrange consultations with their clients, which can include private equity funds, hedge funds and other institutional investors who are considering investment in our industry. Expert network firms may seek to engage you as a consultant due to your knowledge of RXO, or your knowledge of our industry overall. Your provision of such consulting services creates the risk that you use or disclose RXO's confidential information or engage, or assist another party in engaging, in activities that are detrimental to or competitive with RXO.

Business Relationships with Family and Friends

RXO makes all supplier-related decisions, including purchasing decisions, based solely on the supplier's ability to meet RXO's business needs. Personal relationships or friendships cannot be a factor in these decisions. Furthermore, you must disclose any proposed transaction involving the company and yourself, or the company and a member of your family, including any business owned by your family. Written approval by [Ethics and Compliance](#) is required before any such transaction can proceed.

Corporate Opportunities for Your Personal Benefit

In the course of your employment with RXO, you may learn about business opportunities in RXO's industry or related to our business that you are interested in pursuing personally. You may not take personal advantage of these opportunities for yourself, and you may not communicate them to someone outside the company, unless you have disclosed these opportunities to the company and received permission to pursue them.

Romantic or Other Close Personal Relationships

Conflicts of interest also include romantic or other close personal relationships between managers and members of their teams, which may result in the manager being personally biased, or appearing to be biased, when making employment decisions about the employee. Review the employee handbook for more details about intimate relationships in the workplace.



Gifts and Entertainment



Gifts and Entertainment

RXO wins and awards business based on merit. The company does not give or receive business gifts of products, services or entertainment in order to improperly influence business decisions.

Any gift or entertainment you give or receive must be legal under local law, provided openly, given infrequently, must be reasonable in value and not lavish, appropriate under the circumstances and incidental to a legitimate business transaction or relationship. You may not give or accept gifts, including entertainment (for example, meals, event tickets or golf outings) that could create or appear to create an improper influence on a business relationship or decision. You are never permitted to request that a gift or entertainment be given to you.

You should never give a gift to or engage in entertainment with a government official, as defined above in the Anti-Bribery and Anti-Corruption section of this Code; this includes employees of state-owned entities such as a state-owned air carrier, shipper or utility provider. Gifts to and entertainment with government officials and entities are never permissible. Please consult the RXO Anti-Corruption Policy for additional guidance on interactions with government officials and reach out to [Ethics and Compliance](#) with any questions.

It may not always be clear whether a gift is appropriate. Some types of gifts are never allowed, such as cash or “cash equivalents” (for example, a gift card), gifts or entertainment of an offensive or explicit nature, or gifts prohibited by law or contract.

Gifts and Entertainment

Ask yourself:

If you are unsure whether the gift is appropriate, ask yourself—is the gift:

- Reasonable, customary, of modest value, and infrequently given?
- Intended to enhance a business relationship and not to improperly influence the recipient’s objectivity?
- Unsolicited, with no obligation or expectation of reciprocation?
- In good taste and not likely to embarrass the company or anyone else if disclosed publicly?
- Being given to or received from a commercial party (not a government official)?
- Allowed under the organizational policies of both RXO and the recipient or giver?
- Publicly acceptable, meaning you would be comfortable having others, including your friends and family, know about the gift?

If the answer to any of these questions is “no,” you must contact Ethics and Compliance for approval before proceeding at Ethics@rxo.com.

Mandatory Approval Process for Gifts and Entertainment

Approval Requirement for Gifts: You must obtain advance, written approval from Ethics and Compliance prior to giving or receiving any gift valued at \$100 USD or more. Requests for approval are to be submitted to Ethics@rxo.com or through the Gift, Sponsorship and Donation Portal. You must also comply with all other expense approval requirements. For example, your specific location or business unit may have additional, more restrictive approval requirements for gifts. If this is the case, the more restrictive requirements must be followed.

Approval Requirement for Entertainment: Entertainment — such as meals, sporting events or other activities you attend with customers, vendors or other third parties — must be properly approved. You must obtain advance, written approval from a Vice President or higher in your chain of supervision (but may not approve your own entertainment) for entertainment



given or received in the amount of \$150 USD or more per person. Any requests to provide or participate in lavish entertainment (e.g., the Super Bowl, Olympics, Masters Tournament, charters, etc.) or where spouses or family members are also included must be pre-approved by Ethics and Compliance. Requests for approval are to be submitted to Ethics@rxo.com. If entertainment involves funds intended for charity, such as golf outings or other types of sponsorships, you must obtain advance written approval from [Ethics and Compliance](#), regardless of the amount involved. See the Charitable Contributions and Sponsorships section below. You must also comply with all other expense approval and Delegation of Authority requirements. For example, your specific location or business unit may have additional, more restrictive approval requirements for entertainment. If this is the case, the more restrictive requirements must be followed.

Gifts and Entertainment

All gifts and entertainment related expenses and approvals must be accurately recorded in the company's books and records. If you give a gift or entertainment, you must document it in your expense report, including the value of the gift or entertainment, the parties involved (gift giver or receiver and entertainment recipient or participant), and a description of the legitimate business purpose for the gift or entertainment, along with evidence of written pre-approval (where required) and supporting receipts.

Charitable Donations and Sponsorships

All charitable contributions and sponsorships made by RXO –regardless of amount – must be approved in writing by both the Business Unit President and [Ethics and Compliance](#) by emailing Ethics@rxo.com or through the Gift, Sponsorship and Donation Portal.

Charitable Contributions. Charitable contributions are donations paid directly to charitable or civic organizations and not through a third party. Only donations made to bona fide, tax-exempt charitable organizations (such as 501(c)(3)-designated organizations in the United States) may be made.

Charitable contributions must go to an organization, not to an individual, and should never be offered or given as an inducement to obtain or retain business. All such donations should be recorded as a charitable contribution, and evidence of the tax-exempt designation must be submitted to support the expense.

Sponsorships. These contributions may involve solicitations from customers or local community groups for the purpose of supporting charitable or civic organizations and involve interaction with customers (for example golf or sport outings, table sponsorship at a lunch or dinner event). As with charitable contributions, sponsorships should be provided to an organization, not an individual, and should never be offered or given as an inducement to obtain or retain business. **These expenses should be recorded as “sponsorships” and not “charitable contributions.”** For additional information and guidance, you should consult the RXO Anti-Corruption Policy and contact [Ethics and Compliance](#) with any additional questions.



Additional Resources: How to Ask Questions and Report

You may use the following channels as often as necessary to uphold RXO's business ethics standards:

How to Report Concerns

It is your responsibility to speak up and raise questions and concerns and to report any known or suspected conduct that violates this Code, company policies or the law. Employees who speak up are protected under applicable laws, as well as by Zero Tolerance for Discrimination, Harassment and Retaliation Policy. You should raise concerns promptly to your supervisor, your local Human Resources representative, or to the [Ethics and Compliance](#) team.

The following avenues are also open to you:

<p>Ethics Hotline US: (833) 254-2305 Outside the US: visit the Compliance office website (Ethics.RXO.com) to see International Resources</p>	<p>The Ethics Hotline is a toll-free telephone service operated by an independent company. Where permissible under local law, the Ethics Hotline allows you to anonymously report a concern. The Ethics Hotline is available 24 hours a day, seven days a week.</p>
<p>EthicsPoint Online www.RXO.ethicspoint.com</p>	<p>EthicsPoint is an online site operated by an independent company. Where permissible under local law, EthicsPoint will allow you to anonymously report a concern.</p>
<p>Ethics Email Ethics@rxo.com</p>	<p>If for any reason you are unable to connect using the Ethics Hotline and EthicsPoint Online, you can email Ethics and Compliance Ethics@rxo.com</p>

You may report concerns anonymously if you choose to do so (where permitted by local law); however, identifying yourself better enables the company to investigate your concerns and provide you with appropriate follow-up. All reports are handled as confidentially as possible.

After a Report Is Submitted

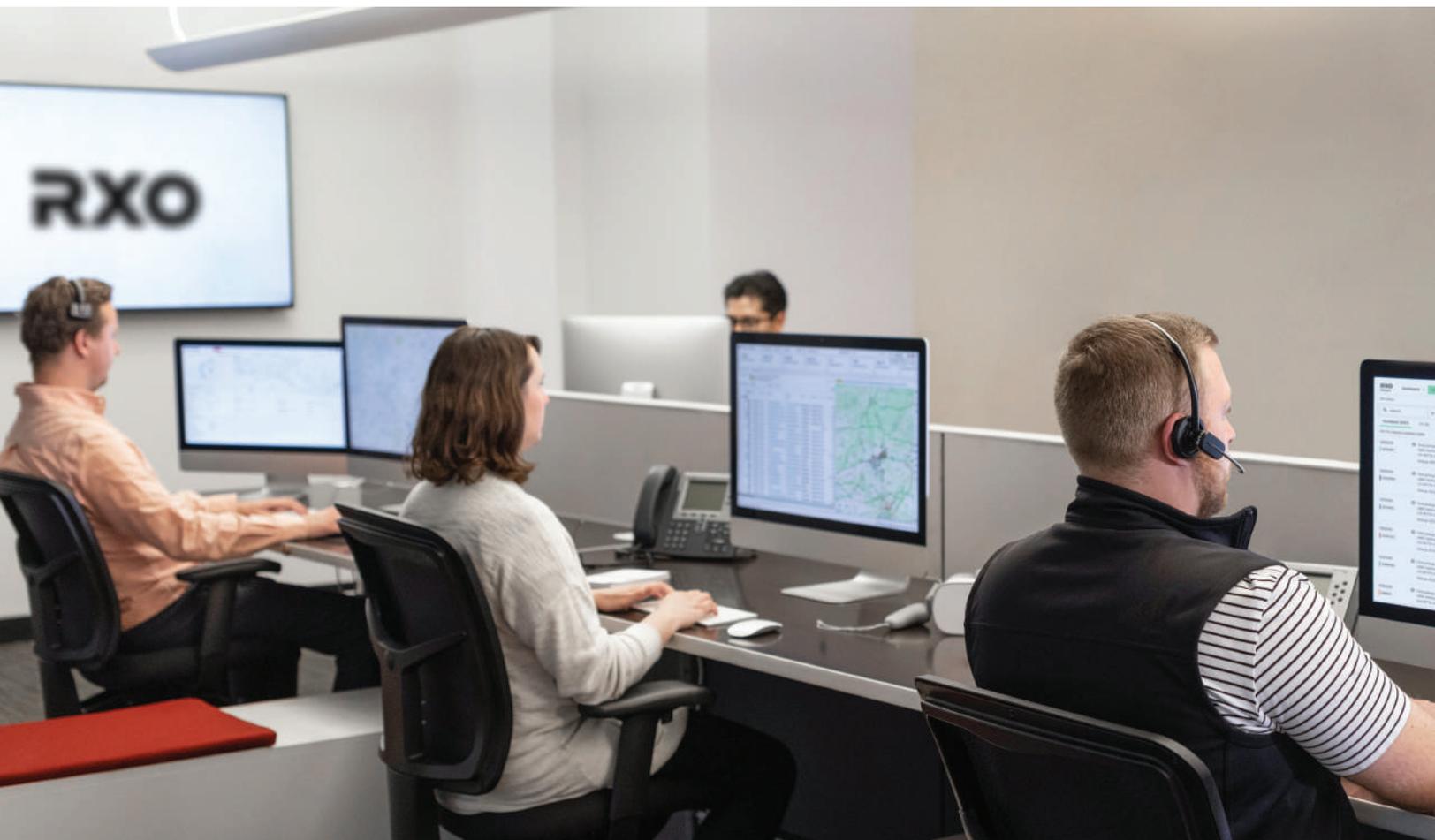
Each report is forwarded to an appropriate member of management, Human Resources or Ethics and Compliance for prompt review. RXO evaluates each report carefully to determine whether further investigation or action is necessary. Employees are required to cooperate fully with company investigations.

The company makes every effort to safeguard the confidentiality of each report, whether or not it is made anonymously; however, sometimes this is not possible due to legal responsibilities or the nature of the incident. Circumstances may prevent the company from sharing what actions it has taken in response to a report.

Please do not attempt to conduct your own individual investigation. Acting on your own may compromise the integrity of an official investigation and could negatively impact both you and the company. RXO will comply with all applicable laws, including data privacy laws, that apply to the reporting party and or the location of the reported incident.



Index of Business Ethics Policies



This Code is supported by the following RXO Business Ethics Policies:

- Anti-Corruption
- Antitrust and Fair Competition
- Zero Tolerance for Discrimination, Harassment and Retaliation
- Trade Compliance
- Third Party Due Diligence
- Securities Trading
- Human Trafficking

If you would like copies of any of these policies, please visit Ethics.RXO.com or contact Ethics and Compliance at Ethics@rxo.com.

Additional requirements may apply to specific locations or business units. If you are working at a customer location, you must follow RXO's policies and any additional, more restrictive, policies required by the customer. Please contact [Ethics and Compliance](mailto:Ethics@rxo.com), your local Human Resources representative, or refer to Ethics.RXO.com for further information.

RXO

RXO, Inc.

RXO.com

