



Political Activity Policy

Effective as of December 19, 2022

XPO, Inc. (“XPO” or “the Company”) is committed to conducting business ethically and with integrity. This commitment includes complying with applicable laws, regulations and standards that govern its participation in the political process.

Public policy decisions have the potential to significantly impact XPO’s business. XPO believes it is necessary to monitor and, when appropriate, participate in the development of public policies that reflect its core values, advance its business objectives and promote the long-term interests of XPO and its shareholders. This Political Activity Policy (“Policy”) sets out the guidelines for XPO’s participation in the political process.

Corporate Political Contributions

XPO may engage in the political process when legal and appropriate. This may include contributions to candidates, political parties, political committees and ballot initiatives in compliance with applicable laws, regulations and reporting requirements. All contributions must be made to promote the interests of XPO and its shareholders. Contributions can never be made to influence an official act, to improperly obtain or retain business, or to gain any other improper business or financial advantage.

Political activity, including political contributions from corporate funds, is subject to various laws— and, in some cases, prohibitions—depending upon the country and level of government office involved. Any proposed contribution must be reviewed in advance by XPO’s Ethics and Compliance Department (“Ethics and Compliance”) to ensure adherence to all legal requirements and ethical standards. The Nominating, Corporate Governance and Sustainability Committee (“Committee”) of the Board of Directors (“Board”) has final approval over all political contributions.

To the extent that XPO decides to engage in the political process, the Company will publicly disclose any political contributions, including:

- Corporate contributions to political candidates, parties and committees;
- Payments to 527 groups, such as governors’ associations and super PACs;
- Independent political expenditures made in direct support of, or opposition to, a campaign; and
- Payments made to influence the outcome of ballot measures.

Any such disclosures, including the recipient names and amounts given, will be made semiannually on a dedicated political disclosure webpage that is easily accessible in the Investors section of the XPO website.

Political Activities and Contributions by Employees

XPO values the right of employees to participate in the political process as private citizens, and decisions to do so are entirely voluntary. Employees engaging in political activities, such as volunteering time to campaigns, organizations or initiatives, must do so in their personal capacity, and they must always make clear that their views and actions are their own and not those of the Company. Any political activity that would suggest XPO's support (including use of an XPO title or logo or a candidate visit to an XPO facility) requires pre-approval by Ethics and Compliance.

XPO policy requires employees to comply with all applicable laws and regulations regarding time spent during working hours in support of, or opposition to, political candidates, committees and initiatives. Employees engaging in political activities must also adhere to the applicable provisions of XPO's Code of Business Ethics. Employees may not use their position with the Company to coerce or pressure other employees to make contributions to, support or oppose any political candidates, parties, committees or ballot initiatives. Employee decisions about whether to make political contributions or not, made in accordance with applicable laws, regulations and company policies, will not impact job status or advancement opportunities.

XPO employees may make political contributions with their own funds according to their own political preferences. XPO will not reimburse or otherwise compensate employees for their political contributions. Employees may not make, or offer to make, any political contribution, even from personal funds, to obtain or retain business or to obtain any other improper advantage on behalf of XPO.

Employees who wish to become candidates for political office may not use their affiliation with XPO as a feature of their political campaigns. Before beginning a campaign for political office, employees should carefully consider and discuss with their managers and Ethics and Compliance the potential impact of such activity and subsequent government service in order to proactively identify any potential conflicts of interest.

Political Action Committee

XPO does not have a Political Action Committee ("PAC"). The Company will update this Policy accordingly should it decide to form a PAC in the future.

Lobbying

When appropriate, XPO may exercise its right to advocate for public policies that advance the interests of the Company and its shareholders. This may include interaction with public officials and regulators at all levels of government. If and when XPO engages in lobbying activities, it will do so in compliance with applicable laws and regulations, including disclosure laws. Likewise, XPO requires external consultants retained by the Company to adhere to applicable laws and regulations. No individual employee may lobby or engage a lobbying consultant on behalf of XPO without express authorization from Ethics and Compliance.

Trade Associations and Advocacy Organizations

XPO maintains memberships in various trade associations and advocacy organizations, which allow the Company to gather information on public policies affecting its business and industry. Memberships are assessed annually by the Committee. Although XPO may agree with certain

positions that such organizations may take, the Company's membership in a particular organization does not indicate that it always agrees with all the positions of the organization or its members. XPO may pay fees or dues to such trade associations and advocacy organizations in connection with its membership. While XPO does not limit its membership fees from being used for public policy engagement activities, it maintains the right to express opposing views if an organization takes a position that differs from that of the Company.

Political Activity Oversight

The Committee oversees the Company's approach to political and advocacy activity, including developing and overseeing related Company policies and procedures, and provides recommendations to the Board on such matters. Ethics and Compliance is responsible for implementing effective reporting and compliance procedures designed to ensure that XPO's political activities are conducted and disclosed in accordance with applicable law and this Policy. Ethics and Compliance will discuss the Company's political activities, including trade association and advocacy organization memberships, lobbying activities and political expenditures, at least annually with the Committee. The Committee will periodically review this Policy and shall approve all revisions.

Policy Applicability

This Policy applies to XPO, including all its subsidiaries, divisions and other operating entities. All directors, officers and employees of XPO are subject to and responsible for complying with the requirements of this Policy.

Reporting Policy Violations

All persons subject to this Policy must immediately report any potential violations of this Policy and/or applicable laws. XPO does not permit retaliation against any person who, in good faith, reports any concerns, misconduct and/or potential violations of Company policy or applicable laws.

Reports can be submitted directly to any member of management, Human Resources or the Legal Department. Reports can also be submitted to Ethics and Compliance at ComplianceOffice@xpo.com. Additionally, employees who are located in the United States or Canada can submit a report through the Company's Ethics Hotline at (800) 638-1486 or website at www.XPO.ethicspoint.com. Employees located outside the US and Canada can report through the Ethics website at www.XPO.ethicspoint.com or call the country phone numbers provided on either the EthicsPoint website or on the Ethics and Compliance website at <https://ethics.xpo.com/en-us/>. Employees' concerns can be reported anonymously, unless otherwise prohibited by applicable local law. Additional reporting options are available to employees in the Company's Code of Business Ethics.

Additional information and guidance regarding this Policy can be obtained from Ethics and Compliance at ComplianceOffice@xpo.com.