



Human Rights Policy

XPO

1. SCOPE AND APPLICABILITY

This Human Rights Policy (“Policy”) applies to XPO, Inc., including all its subsidiaries, divisions, and other operating entities (collectively, “XPO” or the “Company” or “We/Us”). This Policy is binding for all directors, officers, employees, and third parties acting on our behalf across all regions where we operate. Throughout this Policy, the term “Company” encompasses all persons and entities subject to its provisions.

To the extent that this Policy differs from the requirements of local laws or policies which may have more onerous requirements than this policy, the terms of the local law or policy will prevail in relation to XPO’s operations within that jurisdiction.

2. POLICY OVERVIEW AND HUMAN RIGHTS COMMITMENT

XPO is dedicated to conducting business in a way that upholds the human rights and dignity of all individuals. Our company has a zero-tolerance policy towards modern slavery such as human trafficking, forced labor, child labor, or any form of abusive employment practices. We are dedicated to ensuring that our operations and business relationships comply with both global standards and local regulations aimed at combating modern slavery, including acknowledging the recommendations of the Universal Declaration of Human Rights, the UK Modern Slavery Act, the UN Global Compact, and International Labor Organization (ILO) Standards. This approach reflects our commitment to ethical practices and to preventing modern slavery in all its forms across our business.

3. KEY PRINCIPLES IN HUMAN RIGHTS

3.1 Prohibition of Forced and Involuntary Labor

XPO does not engage in or support the use of forced or involuntary labor, or any practices associated with modern slavery, whether directly or indirectly. We endorse government policies across the US, EU, UK, and other regions in which we operate that combat human rights abuses and modern slavery.

3.2 Commitment against Child Labor

XPO does not employ nor condone the employment of individuals under the age of 18. XPO believes that child labor, as identified by the ILO and U.S. state and federal law, harms children, interferes with their education, and prevents their development. As part of our recruitment process, our Human Resources team carefully verifies that all candidates meet the necessary qualifications, including the legal employment age requirements. Prior to starting employment, all new hires are required to provide valid proof of identity and age.

We recognize the value of providing professional experience as part of educational pathways. However, under no circumstances will we have trainees or apprentices under the age of 18 in roles that pose a risk to their health or safety, including hazardous work, night shifts, or overtime.

3.3 Policy against Human Trafficking

Human trafficking constitutes a violation of human rights that strips individuals of their freedoms. This encompasses the use of force, fraud, or coercion to compel labor, or involvement in sex trafficking and other practices that infringe upon individual rights. XPO maintains a zero-tolerance policy for human trafficking within our operations and partnerships.

XPO prohibits the following practices related to trafficking of persons for employees, subcontractors, agents, vendors, partners and any and all associated with XPO business:

- Engaging in any form of human trafficking directly or indirectly,
- Procuring or participating in commercial sex acts during work or using XPO resources,
- Employing forced labor in any capacity related to XPO’s operations,
- Withholding or destroying personal identification documents, such as but not limited to passport or drivers’ license,
- Using recruitment agencies or third-party carriers that are not compliant with federal, state and local labor laws,
- Charging any fees to job applicants or employees for recruitment, hiring and termination processes,
- Failing to provide return transportation for employees recruited internationally for XPO assignments,
- Offering housing that fails to meet host country standards,
- Failing to provide an employment contract or work document where legally required.

3.4 Employment Rights and Fair Labor Practices

XPO is committed to ensuring fair and accessible employment opportunities. Under no circumstances should candidates or employees be required to make any form of payment, monetary or otherwise, to secure a position with XPO. Neither XPO nor any of its workforce providers should receive or offer payments or benefits, in cash or kind, in exchange for employment opportunities. XPO assumes responsibility for recruitment-related costs. In the event of a deviation from this Policy is reported, the Company will promptly investigate and, where applicable, discipline those who violated this Policy and reimburse affected individuals for any improper costs incurred within a reasonable timeframe.

XPO complies with all applicable laws and regulations in the jurisdictions where it operates, including, but not limited to, those pertaining to employee's health, safety, treatment, and compensation. In Europe, where maximum permissible working hours, including overtime, are not specifically defined, XPO adheres to a maximum 60-hour workweek (inclusive of overtime) in accordance with the recommendations of the ILO.

3.5 Freedom of Association and Collective Bargaining

XPO respects the rights of its employees to establish, join, or refrain from joining organizations of their choice, to engage in collective bargaining, and to raise concerns with local management or leadership. XPO employees can elect their representatives in accordance with applicable local and international laws and practices, without fear of reprisal or intimidation.

Where required by law, XPO provides duly elected employee representatives access to authorized managers, workplaces, and employees they represent, as well as the necessary facilities to perform their roles.

Employees are reminded that all activities, including participation in external associations, must comply with applicable laws and XPO's Code of Business Ethics. This includes adhering to antitrust laws and avoiding any actions that may conflict with XPO's values or ethical standards. For further guidance, employees should refer to the Antitrust Guidelines and the Code of Business Ethics.

3.6 Non-Discrimination and Respect

XPO is committed to fostering a workplace in which respect and safety are paramount. We comply with all laws that govern fair employment and labor practices.

XPO ensures fair treatment of all employees and applicants regardless of characteristics such as race, color, religion, sex, sexual orientation, gender identity or expression, pregnancy, marital status, family responsibilities, social origin, age, disability, culture, or any other characteristic protected by law. We provide equal opportunities for growth, recognizing the unique contributions each person brings. XPO is dedicated to creating a culture where employees can collaborate openly, free from harassment or discrimination, and where everyone is treated with respect and dignity.

4. REPORTING MISCONDUCT AND VIOLATIONS

This Policy is supported by existing reporting and remediation procedures outlined in other internal handbooks, guidelines and policies.

4.1 Duty to Report

All individuals subject to this Policy are required to promptly report any misconduct or potential violations of XPO policy, including breaches of this Human Rights Policy or applicable anti-discrimination and human rights laws. Reports can be made through multiple channels such as a manager, XPO Human Resources, or through the Company's confidential Reporting Line, EthicsPoint. Reported concerns are addressed through an established internal and independent allegation management process.

4.2 Grievance Mechanism and Designated Channels

Concerns may be reported directly to a manager, a member of the Human Resources team, or the Ethics & Compliance Office at ethics@xpo.com.

Additional reporting options are available based on your location:

- **For those in the United States and Canada:** Reports may be submitted through our Ethics Hotline at (800) 638-1486 or via our Ethics website at www.XPO.ethicspoint.com.

- **For those located outside of North America** (including Europe, the UK and Morocco): Reports can be submitted through our Ethics website at www.XPO.ethicspoint.com or by visiting the Compliance intranet website at ethics.xpo.com to access international resources
- **For those located in European entities:** Employees may also refer to XPO’s European Whistleblowing Policy for further guidance on reporting procedures and protections.

Please see the Company’s Code of Business Ethics for additional information regarding reporting options and protections.

4.3 Protection against Retaliation

XPO prohibits retaliation of any kind against anyone who, raises concerns about possible misconduct, policy violations or breaches of applicable human right laws. Any employee found to have retaliated against a colleague based on a protected characteristic or for reporting a concern will face disciplinary action, up to and including termination. Where permitted by local law, concerns can be reported anonymously, and confidentiality will be maintained to the extent possible during the investigation process.

4.4 Remediation plan

Concerns reported through designated channels are reviewed by the Compliance Team or Human Resources, depending on the nature of the issue reported. If deemed necessary, an investigation will be conducted. Based on the findings, appropriate actions will be taken, which may include contacting law enforcement or emergency medical services, terminating business relationships or contracts with involved parties, or implementing disciplinary measures, including termination of employment.

If the investigation determines that XPO has caused or contributed to an adverse human rights impact, a remediation plan will be implemented to address the harm and prevent recurrence. This may include compensating affected individuals, improving internal practices and processes, or providing additional training. The Compliance Team or Human Resources will oversee the remediation process to ensure that corrective actions are taken in a timely and effective manner.

Failure to comply with this Policy may have serious consequences for both the Company and the individuals involved. These could include legal actions, fines or even imprisonment. Violating this Policy may also result in severe disciplinary action, including possible termination of employment. The specific legal consequences will depend on how and under what circumstances the Policy was broken. If a violation of applicable law(s) is proven, XPO reserves the right to report the matter to the relevant authorities for further investigation or action.

Version	Date	Description
Original Policy	2021	Initial policy publication Human Trafficking Policy
Revision 1.1	12/28/2022	Change for XPO, Inc.
Revision 2.0	01/01//2025	Further define modern slavery (i.e., child labour, forced labour), grievance mechanism and remediation plan. Change of the policy name to Human Rights Policy.