

RXO, INC.

POLITICAL ACTIVITY POLICY

Effective as of March 22, 2023

RXO, Inc. 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 RXO's business. RXO 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 RXO and its shareholders. This Political Activity Policy sets out the guidelines for RXO's participation in the political process.

Corporate Political Contributions

RXO 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 RXO and its shareholders. Contributions may 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 RXO's Ethics and Compliance Department to ensure adherence to all legal requirements and ethical standards. The Nominating, Governance and Sustainability Committee of RXO's Board of Directors has final approval over all political contributions.

To the extent that RXO decides to engage in the political process, RXO 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 RXO website.

Political Activities and Contributions by Employees

RXO 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 RXO. Any political activity that would suggest RXO's support (including use of an RXO title or logo or a candidate visit to an RXO facility) requires pre-approval by Ethics and Compliance.

RXO 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 RXO's Code of Business Ethics. Employees may not use their position with RXO 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, made in accordance with applicable laws, regulations, and company policies, will not impact job status or advancement opportunities.

RXO employees may make political contributions with their own funds according to their own political preferences. RXO 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 RXO.

Employees who wish to become candidates for political office may not use their affiliation with RXO 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 to proactively identify any potential conflicts of interest.

Political Action Committee

RXO does not have a Political Action Committee. It will update this policy should it decide to form a PAC in the future.

Lobbying

When appropriate, RXO 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 RXO engages in lobbying activities, it will do so in compliance with applicable laws and regulations, including disclosure laws. Likewise, RXO requires external consultants it retains to adhere to applicable laws and regulations. No individual employee may lobby or engage a lobbying consultant on behalf of RXO without express authorization from Ethics and Compliance.

Trade Associations and Advocacy Organizations

RXO maintains memberships in various trade associations and advocacy organizations, which allow RXO to gather information on public policies affecting its business and industry. Memberships are assessed annually by the Nominating, Governance and Sustainability Committee. Although RXO may agree with certain positions that such organizations may take, its membership in a particular organization does not indicate that it always agrees with all the positions of the organization or its members. RXO may pay fees or dues to such trade associations and advocacy organizations in connection with its membership. While RXO 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 Nominating, Governance and Sustainability Committee oversees RXO's approach to political and advocacy activity, including developing and overseeing related 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 RXO's political activities are conducted and disclosed in accordance with applicable law and this policy. Ethics and Compliance will discuss RXO's political activities, including trade association and advocacy organization memberships, lobbying activities and political expenditures, at least annually with the Nominating, Governance and Sustainability Committee. The Nominating, Governance and Sustainability Committee will periodically review this policy and approve all revisions.

Policy Applicability

This policy applies to RXO, including all its subsidiaries, divisions, and other operating entities. All directors, officers, and employees of RXO 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. RXO does not permit retaliation against any person who, in good faith, reports any concerns, misconduct and/or potential violations of 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 Ethics@rxo.com. Additionally, employees who are in the United States can submit a report through RXO's Ethics Hotline at (833) 254-2305 or website at www.RXO.ethicspoint.com. Employees located outside the US can report through the Ethics website at www.RXO.ethicspoint.com or call the country phone numbers provided on either the EthicsPoint website or on the Ethics and Compliance website at <https://ethics.rxo.com>. Employees' concerns can be reported anonymously, unless otherwise prohibited by applicable local law. Additional reporting options are available to employees in RXO's Code of Business Ethics.

Additional information and guidance regarding this policy can be obtained from Ethics and Compliance at Ethics@rxo.com.