Judy R. McReynolds
Chairman & Chief Executive
Officer ArcBest

Business Ethics

A MESSAGE FROM THE CHAIRMAN & CHIEF EXECUTIVE OFFICER

ArcBest has grown dramatically over the past century, evolving from a local freight hauler to a multibillion-dollar logistics powerhouse. This incredible journey is built on a foundation of high ethical standards and the trust of our people, customers and partners. Our progress isn't just about the services and solutions we provide — it's about how we conduct our business.

Creativity, Integrity, Collaboration, Growth, Excellence and Wellness are more than just words to us. Our Core Values define who we are and guide our actions. We attract and employ talented individuals who live out these values and help foster a positive, ethical work culture.

Our Code of Conduct is a key part of this. It's a guide to help each of us make ethical decisions, maintain our high standards, and preserve the trust we've built. Here's why it matters:

- It sets out the behaviors and standards expected from everyone at ArcBest, ensuring we conduct business with integrity and respect
- It sets the expectations for the conduct of vendors, suppliers and service providers doing business with ArcBest and our operating companies
- It emphasizes the importance of compliance, which applies equally to everyone within the organization
- It provides clear channels for reporting any suspected violations, ensuring you can raise concerns safely and confidently

Who must follow our Code of Conduct?

Our Code of Conduct is a company-wide resource for ArcBest, our operating companies and third parties we do business with. Everyone, from the newest team member to the most senior executive, is expected to understand and follow it. As you review the Code of Conduct, consider how it relates to your role, the regulatory environments you encounter and your interactions with others inside and outside the company.

Reporting concerns

I encourage you to speak up if you ever have concerns — whether about a potential Code of Conduct violation, employee or partner mistreatment, or questionable business practices. Our Code of Conduct, Section E: How to Report Questionable Practices and Make Complaints, outlines various reporting methods, including the independent EthicsPoint platform managed by NAVEX Global. You can report issues anonymously or confidentially, and each complaint is taken seriously. Any report received is reviewed by me, the Company's President, the Company's Chief Legal Officer, the Company's Vice President – Internal Audit, and the Chair of the Audit Committee. I also want to emphasize that our policy strictly prohibits retaliation against anyone who raises an issue or complaint.

Our commitment to excellence

Aligned with our mission: To connect and positively impact the world through solving logistics challenges, we believe that conducting business ethically and with integrity is vital to our success. Thank you for your continued dedication to excellence while embodying our values-driven culture each and every day.

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Judy R. McReynolds

Our Mission

To connect and positively impact the world through solving logistics challenges

Our Vision

We'll find a way

It's a testament to what our customers say about us. We're the kind of company that partners with them to solve problems and make things happen. It speaks to the can-do attitude of our people to do the hard things well.

Our Core Values













ArcBest Corporation

CODE OF CONDUCT

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Last reviewed: 10/29/2024 1

Introduction

ArcBest Corporation's general principles of business conduct and ethics are set out in this document (this "Code of Conduct" or "Code") and are governed by the Board of Directors (the "Board"). The Code of Conduct does not cover every issue that may arise, but it sets out basic principles covering a wide range of business practices and procedures to guide all employees, officers and directors of ArcBest Corporation and its Subsidiaries (as defined herein) (collectively, the "Company"). These principles of business conduct and ethics also extend to the Company's representatives, agents, sub-contractors, vendors, and suppliers (collectively, "Suppliers").

Directors, officers, employees, and Suppliers must conduct themselves according to this Code of Conduct and in a manner to avoid even the appearance of illegal or unethical behavior.

Employees with supervisory responsibilities have a special obligation to promote a culture of integrity within the Company. Supervisors should discuss the importance of the Code of Conduct with employees, make ethics conversations part of their routines, and encourage employees to come to them with questions or concerns. Supervisors should not only act with integrity themselves, but should set an example for all employees by knowing the Code of Conduct, knowing when to escalate issues, and inspiring others to follow their lead.

Some of the areas addressed in this Code of Conduct may also be more specifically dealt with by policies of the Company about a specific area. For example, the Company's <u>Supplier Code</u> <u>of Conduct</u> provides expectations regarding the conduct of vendors, suppliers and service providers doing business with the Company. If a law, rule or regulation conflicts with this Code of Conduct, you must comply with the law, rule or regulation. If a local custom or a policy of the Company conflicts with this Code of Conduct, you must comply with this Code of Conduct.

Those who violate the standards in this Code of Conduct, or any specific policy of the Company, will be subject to appropriate disciplinary or other corrective action, up to and including termination of employment or other engagement relationship. If you are in a situation that you believe may violate or lead to a violation of law, this Code of Conduct or a Company policy, you should seek guidance from your supervisor or Company contact, or the contacts provided under "Section E: How To Report Questionable Practices and Make Complaints."

Nothing in this Code is intended to limit or interfere with your rights as an employee under the law, including the National Labor Relations Act (NLRA), nor will the Company construe this Code in a way that limits such rights. Employees have the right to engage in or refrain from activities protected by the NLRA.

If you have questions or concerns about a Code of Conduct provision, any other Company policy, or about some action or practice you observe, you should always bring your questions to the attention of the Company by talking to your supervisor, other members of management, your Company contact (if you are a Supplier), the Company's Legal or Internal Audit Departments or by using the anonymous reporting system available to Company employees. See "Section E: How To Report Questionable Practices and Make Complaints" for detailed information on how to make reports to the Company. The key is to make the Company aware of any questions or concerns you have so they can be investigated, evaluated and appropriately addressed.

Section A: Business Conduct and Ethics

1. Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which the Company's ethical standards are built. All directors, officers, employees, and Suppliers of the Company must respect and obey the laws of the cities, states and countries in which we operate. This includes, but is not limited to, laws, rules and regulations governing work hours, wages and benefits; environmental permits, emissions, and hazardous materials; anti-bribery and anti-corruption; competition and antitrust; trade compliance and export controls; protection of intellectual property; and data protection and security.

The Company provides information as appropriate to communicate and promote compliance with laws, rules and regulations related to the operation of the Company's business.

Although directors, officers, employees, and Suppliers are not expected to know the details of each of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate Company personnel.

2. Full and Fair Disclosure of Accounting Matters

It is the Company's policy that it will make full, fair, accurate, timely, and understandable disclosure in all reports filed with or submitted to the Securities and Exchange Commission and in other public communications of financial results of the Company. The Company is committed to achieving compliance with all applicable securities laws and regulations, and all applicable accounting, financial reporting and disclosure standards.

It is a violation of this Code of Conduct for any director, officer, employee, or Supplier to take any action, or assist in any action, that results in materially inaccurate accounting, record keeping or financial reporting including, but not limited to, any of the following:

- commit fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- commit fraud or deliberate error in the recording and maintaining of financial records of the Company;
- fail to comply with the Company's policies and procedures regarding internal accounting controls;
- make a misrepresentation or false statement regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- fraudulently influence, coerce, manipulate or mislead any independent public or internal auditor engaged in the performance of an audit of the financial statements, internal controls or policies of the Company; or
- deviate from full and fair reporting of the Company's financial condition or financial results.

If any employee, officer, or director has concerns or complaints regarding accounting or auditing matters of the Company, then they are encouraged to submit those concerns by one of the methods described in "Section E: How To Report Questionable Practices and Make Complaints" below.

3. Conflicts of Interest

A "conflict of interest" may exist when personal interests, directly or indirectly, are involved or interfere in any way with the interests of the Company. For example, a conflict situation can arise when an employee, officer or director or a third party who acts as a representative of, or provides services for, the Company takes actions or has interests (whether personal or business) that may make it difficult to perform his or her work for the Company objectively and effectively. Conflicts of interest may also arise when an employee, officer or director, or his or her family member, close family friend, romantic partner or any member of his or her household, receives improper personal benefits as a result of his or her position in the Company.

While we cannot identify every potential conflict, it is important to know and avoid common situations that could create a conflict or the perception of a conflict. The best policy is to avoid any direct or indirect business connection with our customers, vendors, suppliers or competitors, except as it relates to the Company's business or if it is within the limited exceptions described below.

Conflicts can arise in various contexts, including outside employment, financial investments, gifts and entertainment, and personal relationships. Here are some examples:

- In most cases, it is a conflict of interest for a Company employee, officer or director to work simultaneously for a competitor, customer or supplier.
 - O However, it is not a conflict of interest to work for another company as a parttime or casual office employee, dock worker or driver so long as the work does not interfere with your work for the Company.
- You are not allowed to act as a consultant, officer, volunteer, lender, agent or board member, or in a sales or management role for a competitor.
- You should not invest in another company that does business with the Company (for example, a supplier) if you can influence the Company's relationship with such company.

Any situation in which the Company is currently doing business or expects to enter into business of any type with an entity that is owned, managed or controlled by a director, officer or employee, or his or her family member, close family friend, romantic partner or any member of his or her household, should be disclosed, in the case of employees, to the employee's supervisor and, in the case of officers or directors, to the Company's Chief Legal Officer. Any person who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate Company personnel or follow the procedures described in "Section E: How to Report Questionable Practices and Make Complaints." It is immaterial whether the employee was originally aware of the conflict. An employee that discovers a conflict during or after-the-fact must report it and discontinue the arrangement or activity. Supervisors who become aware of such business arrangements should advise the Company's Chief Legal Officer.

Director, officer and employee conflicts of interest are prohibited as a matter of Company policy, except to the extent approved, in the case of the Company's directors and executive officers, by the Board (or its applicable designees) and, in the case of the Company's other officers or employees, by an executive officer of the Company after consultation with the Chief Legal Officer (or his designee).

Conflicts of interest must be evaluated in each case considering all relevant circumstances. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor or the Company's Legal Department.

4. Insider Trading

Federal and state securities laws prohibit any person who is aware of material, non-public information about a company from trading in securities of that company, which is commonly known as "insider trading." These laws also prohibit a person from disclosing material, non-public information to other persons who may trade on the basis of that information, which is commonly known as "tipping."

Directors, officers and employees who have access to confidential information are not permitted to use or share that information for stock-trading purposes or for any other purpose except the conduct of our business. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision based on this information is not only unethical, but also illegal and may be subject to prosecution by governmental agencies. The Company's "Insider Trading Policy" applies to all employees and requires directors, officers and certain employees, who are subject to additional restrictions and requirements set forth in the Insider Trading Policy, to agree in writing to comply with such policy. If you have any questions, please consult with the Company's Chief Legal Officer. Third parties, such as the Company's Suppliers, are also subject to certain restrictions on trading in Company securities, including rules governing insider trading, and must comply with all securities laws and regulations.

5. Corporate Opportunities

Employees, officers and directors are prohibited from taking personal advantage, or enabling others to take personal advantage, of opportunities that are discovered through the use of corporate property, information or position without the consent of the Board. No employee, officer or director may use corporate property, information, or position for improper personal gain, and no employee, officer or director may compete with the Company directly or indirectly. Employees, officers and directors owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

6. Anti-Bribery, Anti-Corruption

Our success is driven by our commitment to acting with integrity. We do not tolerate unethical or illegal behavior in order to obtain or keep business. All employees, officers and directors must follow anti-bribery and anti-corruption laws and never offer, pay, promise to pay, or accept anything of value either directly or indirectly to improperly influence the judgement or actions of others. A bribe may come in many forms that may not always be obvious, including a gift, the promise of a job, the offer of a tip, or a charitable contribution – all could be considered bribes if offered in exchange for any decision or favorable treatment. Facilitation payments are prohibited, regardless of amount or local custom. Violating these laws can have serious consequences on employees and the Company, including damage to our reputation, fines, and jail time. Follow the law, this Code of Conduct, and any other Company policies and avoid actions that even suggest something improper.

7. Competition and Fair Dealing; Antitrust

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing disclosure of stolen propriety information or trade secrets by past or present employees of other companies is prohibited and potentially illegal. Each employee, officer and director should endeavor to respect the rights of and deal fairly with the Company's customers, suppliers, competitors and employees. No employee, officer or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

Antitrust laws in the United States and other countries are intended to preserve a free and competitive marketplace. The Company requires full compliance with these laws. Employees, officers, and directors must not share confidential business information with our competitors and must not engage in any conduct that could unreasonably restrict our competitors' access to the market. Antitrust laws are complex and can be difficult to understand. Employees, officers, and directors should seek advice from the Legal Department when dealing with antitrust issues.

8. Gifts, Gratuities, Meals and Entertainment

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers, suppliers or others. Note also that strict laws and regulations regarding gifts, gratuities, meals and entertainment apply to all of our dealings with governmental customers and government contractors (discussed further in paragraph 9, below). No gift or entertainment should ever be offered, given, provided or promised by any Company director, officer or employee, or his or her family member, close family friend, romantic partner or any member of his or her household unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) is not a bribe, illegal gratuity, facilitation payment, kickback or other form of payoff, and (5) does not violate any laws, regulations or Company policies. Please discuss with your supervisor any gifts or proposed gifts that you are not certain are appropriate.

Employees are similarly prohibited from receiving or requesting gifts, gratuities, meals, entertainment or other thing of value from vendors or suppliers, other than promotional items of nominal value and non-extravagant meals and entertainment which arise in the normal course of business meetings or discussions.

Violation of this Company policy not only is a violation of the Code of Conduct but may also result in civil and criminal fines and penalties. Company employees who are involved in any capacity in the sales function should be familiar with the Company's policies regarding expenses, including promotional expenses.

If you have a question about a specific circumstance or situation, the Company's Legal Department can provide guidance to you in this area.

9. Payments to Government Personnel and Government Contractors

From time to time, the Company's business obligates it to interact with officials and employees of (1) foreign governments; (2) U.S. federal, state, and local governments; and (3) U.S. and foreign political parties. The U.S. Foreign Corrupt Practices Act prohibits giving, promising or offering of anything of value, directly or indirectly, to officials or agencies of foreign governments or foreign political parties or candidates in order to obtain or retain business or a business favor or advantage or when otherwise intended to influence the action taken by any such individual or agency. The Company strictly prohibits making illegal payments to government officials of any country for any purpose.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities, gifts, meals and entertainment which may be accepted by U.S. government personnel, and government contractors. Employees are prohibited from providing, attempting to provide, or offering to provide a gift, gratuity, meal, entertainment or other thing of value (directly or indirectly) to an employee or representative of a governmental entity (foreign or domestic), government contractor, or government subcontractor, when seeking to gain government related business or for any other purpose, unless expressly authorized and approved by the Company's Legal Department. Employees also are prohibited from soliciting, attempting to solicit or receiving gifts, gratuities, meals, entertainment or other thing of value (directly or indirectly) from government, government contractor or government subcontractor employees or representatives.

Violation of this Company policy not only is a violation of the Code of Conduct but may also result in civil and criminal fines and penalties. Company employees who are involved in any capacity in the sales function should be familiar with the Company's policies regarding expenses, including promotional expenses.

If you have a question about a specific circumstance or situation, the Company's Legal Department can provide guidance to you in this area.

10. Political Contributions

Contributions by corporations are subject to various restrictions and, in some cases, may be prohibited by law. Because of the significant legal and other issues, contributions of the Company's corporate funds, goods or services to any politician, political party, or candidate for public office without the approval of the Company's Chief Executive Officer or President are strictly prohibited. Further, it is expressly forbidden for any director, officer or employee to seek reimbursement from the Company for any political payment made by individuals through an expense account, salary, or other form of return or remuneration, whether made personally by the individual or through others. Employees may generally make contributions to candidates as individuals and on their own behalf, subject to federal and state laws, but are prohibited from directly or indirectly coercing any other employee into making political or charitable contributions.

11. Anti-Money Laundering

Money laundering is a process criminals use to move funds gained from illegal activities through legitimate businesses to make the funds appear legitimate and hide their criminal origin. We are committed to conducting our business in a way that prevents the use of our business transactions by those who might abuse them. Employees should follow the Company's due diligence practices and use good judgement to get to know our suppliers, business partners, and other third parties. Be proactive when reviewing financial transactions that might signal a problem and report any concerns if you see or suspect activities or transactions that appear to be outside of normal processes.

12. Human Rights

ArcBest believes that respect for human rights is foundational for the Social component of our Environmental, Social and Governance ("ESG") programs. In addition to our commitment to the UN Global Compact's ten principles on human rights, we acknowledge and respect internationally recognized human rights principles as described in the UN Guiding Principles on Business and Human Rights. Consistent with the rights and practices set forth in this Code of Conduct and our Supplier Code of Conduct, all employees, officers, directors and Suppliers are expected to uphold the following principles:

- · Support and respect the protection of internationally proclaimed human rights;
- Avoid complicity in human rights abuses;
- · Provide a safe work environment in all of our locations and operations;
- · Recognize access to clean water as a fundamental human right;
- Pay employees a fair living wage that meets or exceeds legal minimum wage and provide all benefits and overtime pay in compliance with applicable laws;
- Recognize and respect the rights of employees to freedom of association and collective bargaining;
- Support a precautionary approach to environmental challenges, and undertake initiatives to promote greater environmental responsibility;
- Promote an inclusive work environment that values the diversity of employees and respects the rights of individuals, including but not limited to women, the LGBTQ+ community, and minorities;

- Only employ United States citizens and aliens who are authorized to work in the United States;
- Never engage in, use or tolerate any form of forced labor, child labor or human trafficking;
- Do not discriminate, or tolerate discrimination, on the basis of gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability, gender identity or any other category protected by law;
- Do not promote or tolerate any form of physical, sexual or psychological abuse, verbal harassment, bullying or intimidation;
- · Work against corruption in all its forms, including extortion and bribery.

We must all work to ensure prompt and consistent action against violations of human rights, including human trafficking. Employees are obligated by this Code of Conduct and Company policies to promptly report any known or suspected legal or ethical violation to a supervisor, Human Resources, Internal Audit or the Legal Department, or through the EthicsPoint reporting hotline, as set forth in "Section E: How To Report Questionable Practices and Make Complaints."

13. Discrimination and Harassment

The Company is an Equal Opportunity Employer. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate illegal discrimination or harassment of any kind, including discrimination or harassment based on race, color, religion, age (40 or older), disability, protected veteran or military status, sex (including pregnancy, gender identity, or sexual orientation), national origin, union activity, genetic information, or any other characteristic protected by law. Examples of illegal discrimination or harassment include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. Employees, officers and directors must comply with all anti-discrimination, anti-retaliation, and anti-harassment laws. The Company has a written policy prohibiting discrimination, including sexual harassment, with which all directors, officers, employees, and Suppliers are required to comply.

If any employee, officer, or director believes they have been harassed by anyone at the Company, they should immediately report the incident to their supervisor, Human Resources, Internal Audit or the Legal Department, or through the EthicsPoint reporting hotline, as set forth in "Section E: How To Report Questionable Practices and Make Complaints." Similarly, supervisors and managers who learn of any such incident should immediately report it through the available channels. Human Resources, the Legal Department or other appropriate authority will promptly and thoroughly investigate any complaints and take appropriate action.

14. Health & Safety

To promote the health and safety of our employees, customers and other visitors to our campuses, compliance with our safety requirements and all other laws and regulations is essential. ArcBest supports every person's right to safety and security, and we strive to provide each employee, officer and director, as well as customers, vendors, or other visitors, with a safe and healthy work environment, including access to clean water and public conveniences. Each employee, officer and director has responsibility for maintaining a safe workplace for all employees, customers and associates by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted. The Company has a written policy regarding the reporting of violence in the workplace.

Employees, officers and directors are expected to perform their Company-related work in a safe manner, and should report to work in a condition to perform their duties, free from the influence of or impairment caused by drugs (whether or not illegal) or alcohol. The unauthorized use of alcohol in the workplace will not be tolerated. The use of illegal drugs, and the misuse of legal drugs, by employees will not be tolerated.

15. Environmental

The Company expects its employees, officers, and directors to follow all applicable environmental laws and regulations. If you are uncertain about your responsibility or obligation, you should check with your supervisor or the Legal or Real Estate Department for guidance. You should immediately report to management any emergency situations involving any types of potential environmental harm to persons or property.

16. Record Keeping

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions and must conform both to applicable legal requirements and applicable Company policies.

The Company requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the true number of hours worked should be reported on timecards and time sheets and only the true number of service hours should be recorded in driver logs. All information relating to shipments, such as delivery times, should be accurately reported. All safety inspection and testing documents must be handled in accordance with all applicable laws and regulations.

Many employees regularly use business expense accounts or seek reimbursement for business expenditures, which must be documented and recorded accurately and in a timely manner. The Company has rules and guidelines for expense reports and reimbursement with which employees that use expense accounts or seek reimbursements should be familiar. If you are not sure whether a certain expense is appropriate under Company policy, ask your supervisor.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, internal memos, formal reports, instant messaging and correspondence of any type.

Records should always be retained or destroyed according to the Company's record- retention policies and applicable laws. In accordance with those policies, in the event of threatened or actual claims, litigation or governmental investigation, all related materials, including electronic communications, should be retained and not destroyed or deleted without the prior approval of the Company's Legal Department.

17. Confidentiality

Directors, officers, employees, and Suppliers must maintain the confidentiality of confidential information entrusted to them by the Company, except when disclosure is authorized by the Legal Department or required by laws or regulations. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company, if disclosed. It also includes information that suppliers and customers have entrusted to us as confidential information.

It is the responsibility of each of us to use discretion in handling Company information so that we do not inadvertently reveal confidential information to competitors or other third parties. If you are unsure about whether certain information is confidential, presume that it is. The obligation to preserve confidential information continues even after employment ends.

18. Protection and Proper Use of Company Assets

All employees, officers and directors should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. Company assets should not be used for non-Company business, though incidental personal use of computer equipment may be permitted in accordance with applicable Company policy.

The obligation of employees, officers and directors to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, Company-developed software and copyrights, as well as business, marketing and service plans, Company-developed operating procedures, engineering ideas, designs, databases, records, salary and other employee personnel and health and welfare information, as well as any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Company policy. It could also be illegal and result in civil or even criminal penalties.

19. Reporting Illegal or Unethical Behavior

It is the obligation of every employee to promptly talk to supervisors, managers or other appropriate parties as listed in "Section E: How to Report Questionable Practices and Make Complaints" about observed or suspected illegal or unethical behavior, including any violation of this Code of Conduct. It is the policy of the Company not to allow retaliation for reports of misconduct by others made in good faith by employees. Retaliation for good faith reports of suspected criminal activity, and certain other matters, could also be illegal under federal law.

Employees with concerns may talk to their supervisor or forward complaints on a confidential or anonymous basis through any of the contacts listed in "Section E: How to Report Questionable Practices and Make Complaints."

20. Training

The Company strives to provide employees with specific job training, as well as training opportunities for personal development. The Company provides annual training on the ArcBest Corporation Code of Conduct, including anti-corruption and corporate policy compliance, as well as training on various human rights topics.

Section B: Waivers of the Code of Conduct

Any waiver of this Code of Conduct for ArcBest Corporation's officers or directors may be made only by the Board or a Board committee and will be promptly disclosed to the extent required by law or Nasdaq rule.

Section C: Cooperation with Investigations

All directors, officers, employees and Suppliers are required to fully cooperate in the investigations of possible violations of this Code of Conduct or other internal or external investigations. To the extent not prohibited by law, directors, officers and employees shall immediately notify the Company's Legal Department upon becoming aware of any external investigation of the Company.

No director, officer, employee or Supplier shall:

- alter, destroy, mutilate, or conceal a record, document, or other object, or attempt to do so, intending to impair its integrity or availability for use in an investigation; or
- otherwise attempt to obstruct, influence or impede any investigation.

Section D: No Retaliation

No employee or other person shall be retaliated against for the good faith reporting of any violation of this Code of Conduct. No employee shall be discharged, demoted, suspended, threatened, harassed, or otherwise discriminated against for providing truthful information to his or her supervisor, federal regulatory or law enforcement agents, or any authorized legislative or judicial body, or for assisting in the investigation of conduct that the employee reasonably believes constitutes a violation of criminal fraud statutes, any rule or regulation of the Securities and Exchange Commission or any provision of federal law relating to fraud against shareholders.

Section E: How to Report Questionable Practices and Make Complaints

1. Obligation to Report

If you have a question or concern that something you are asked to do or that someone else is doing may violate this Code of Conduct or is otherwise questionable, illegal or unethical, you have an obligation to report it to the Company.

2. Who to Contact About An Inquiry or Complaint

If you have a question or concern, the steps outlined below under "4. Compliance Guidelines" is a good process to follow; however, if you prefer, you can communicate directly to any of the following:

Chief Legal Officer: Michael R. Johns

ArcBest Corporation

PO Box 10048 Fort Smith, AR

72917 (479) 785-6130 email: mjohns@arcb.com

Vice President -

Laura Bogner

Internal Audit: ArcBest Corporation

PO Box 10048 Fort Smith, AR

72917 (479) 785-6272 email: lbogner@arcb.com

Employees may make such communications on a confidential and anonymous basis. Employees may also submit confidential, anonymous reports through EthicsPoint:

EthicsPoint Anonymous Ethics & Compliance

Reporting Tool Toll Free: 1-800-495-1702 (available 24 hours / 7 days a week) Online: www.arcb.ethicspoint.com EthicsPoint is a confidential reporting tool created by NAVEX Global, a company that provides and maintains employee-reporting programs for other companies, such as ArcBest Corporation and its Subsidiaries. Because NAVEX Global is completely independent of ArcBest Corporation, confidentiality and anonymity of information reported can be maintained, if requested by the employee. Calls and online reports to EthicsPoint are reported to the Company's Chief Executive Officer, President, Chief Legal Officer, Vice President – Internal Audit and the Chairman of the Company's Audit Committee.

3. How Will Inquiries and Complaints be Investigated

The subject matter of an inquiry or complaint will determine who within the Company is responsible for its investigation.

- Upon receipt of each inquiry or complaint, whether by the Chief Legal Officer or the Vice President Internal Audit, or through EthicsPoint, a determination will be made as to whether the complaint pertains to "Accounting Matters" or "Other Matters".
- "Accounting Matters" are inquiries or complaints relating to any questionable accounting, internal accounting control or auditing matters, specifically including any matters covered under "Section A, Item 2. Full and Fair Disclosure of Accounting Matters" of this Code of Conduct. Accounting Matters inquiries or complaints will be reviewed under the Audit Committee's direction and oversight in such manner as the Audit Committee determines to be appropriate. The Audit Committee is composed entirely of directors who are independent of Company management. The Audit Committee has the authority to engage independent attorneys, auditors or other investigators or experts in connection with the investigation of any Accounting Matter.
- "Other Matters" are all inquiries or complaints that are not "Accounting Matters". Other
 Matters inquiries or complaints will be reviewed under the direction and oversight of
 the Company's Chief Legal Officer, the Company's Vice President Internal Audit, the
 Company's Chief Executive Officer, the Company's President or such other persons as
 the Company determines to be appropriate.

Prompt and appropriate corrective action will be taken when and as warranted by the results of the investigation of a reported matter.

4. Compliance Guidelines

We must all work to ensure prompt and consistent action against violations of this Code of Conduct. However, in some situations, it may be difficult to be certain if a situation is a violation of this Code of Conduct. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are some steps that may apply:

- The assigned investigator should gather as many facts as practical. In order to understand the issues and investigate an inquiry or complaint, the person assigned by the Company or the Audit Committee to investigate the matter must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem illegal, unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense.
- <u>Clarify your responsibility and role.</u> In most situations, there is shared responsibility.
 Are your colleagues informed? It may help to get your colleagues involved and discuss your concerns.
- <u>Discuss the problem with your supervisor.</u> This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.
- <u>Seek help from Company resources.</u> In any situation that you are not comfortable discussing with your immediate supervisor, you can discuss it with a higher level of management, the Company's Legal Department, or any of the contacts in "Section E, Item 2. Who To Contact About An Inquiry or Complaint."

SECTION F: ArcBest Corporation Subsidiaries

As used throughout this Code of Conduct, the terms "Subsidiary" and "Subsidiaries" refer to ArcBest Corporation's direct and indirect majority-owned subsidiaries, including the companies listed on Exhibit 21 to ArcBest Corporation's most recent Annual Report on Form 10-K filed with the Securities and Exchange Commission.

Approved by the Audit Committee of the ArcBest Corporation Board of Directors as of October 29, 2024.