

Expeditors®

Code of
Business Conduct

A Message from Our President & CEO



Expeditors has had a Code of Business Conduct for many years. While the core Cultural Values embedded in the Code — Integrity, Excellence, and Confidence, among others — remain unchanged, we have refreshed the Code to update its look and feel. I think you will find it better organized, easier to read and understand, and more useful on a day-to-day basis.

Early in the Code's introductory section are these words:

> ***"This Code is not a comprehensive guide to all of Expeditors' policies or to all of our responsibilities under law and regulation. Instead, the Code is an important reference to help you understand your obligations and think through how to do business the right way."***

To me, those two sentences are in many ways the most important in the entire document. The Code guides and instructs us about how to protect and honor Expeditors, our shareholders, our customers, our service providers, and — most importantly — each other. It is a source of strength and wisdom that, when followed, enables us all to do business the right way, no matter what our job title, area of responsibility, or immediate task. I encourage you to read the Code thoroughly and refer to it often.

Dan Wall
President & Chief Executive Officer

A Message from Our CECO

As Expeditors' Chief Ethics & Compliance Officer, I too urge you to carefully review the Company's updated Code of Business Conduct, incorporate its guidance into how you represent Expeditors, and always keep in mind that how we conduct business is just as important as what we do.

The Code's true value is in its reinforcement of the fundamental principles of ethical, compliant conduct. Those principles aren't unique to Expeditors, but they are simple, elegant, and powerful:

- Be honest & accurate
- Be good
- Be loyal
- Be fair & objective
- Be respectful & considerate

Expeditors is absolutely committed to abiding by these fundamental values and to exceptional performance with integrity. All of us rely on each other to uphold the highest standards in all that we do. Not clear on something? Consult with your supervisor, manager, DM, RVP, or other Company leader. And if I can assist you in any way, please do not hesitate to contact me, day or night.



Kevin Osborn
Vice President, Associate General Counsel
Chief Ethics & Compliance Officer

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Online
expeditors.ethicspoint.com

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Introduction

Does the Code apply to me?

Does the Code cover everything?

What is my responsibility?

What should I know about enforcement of the Code?

How do I get guidance or raise a concern?

Questions About the Code



Does the Code apply to me?



Yes.

The Code of Business Conduct ("Code") applies to every employee, director, and officer worldwide. It also applies to parties acting on behalf of Expeditors, such as third-party brokers and other service providers. You should read and familiarize yourself with this Code as well as with all other Expeditors policies, procedures, statements of work, handbooks, and similar information that apply to your job.

If you have a question or idea regarding the Code, do not hesitate to ask that question or offer up that idea. This is our Code—yours, mine, the Chairman of the Board's, the Chief Executive Officer's, the Regional Vice President's, and the District Manager's.

It belongs to all of us.

It applies to all of us.

And it will help us continue to drive Expeditors in the right direction if we take time to understand it, live it, and continue to make improvements to it.

Does the Code cover everything?



No.

This Code is not a comprehensive guide to all of Expeditors' policies or to all of our responsibilities under law and regulation.

Instead, the Code is an important reference to help you understand your obligations and think through how to do business the right way. You can find more information about specific policies on the Expeditors intranet.

Use our practice of open door access to speak to your supervisor, manager, or other leader. The Legal Department also can provide additional guidance.

What is my responsibility?

You have a responsibility to do what is right.

You do what is right when you comply with the letter and the spirit of the Code, Expeditors' policies and procedures, and all applicable laws and regulations. The letter of the Code, as an example, is the literal requirements of that Code provision — what the Code says. The spirit is the intent inspiring those requirements — what is intended by the Code. Both are very important. The best interests of the Company are not served by exploiting general language, technicalities, or other loopholes to comply with only the letter (but not the spirit) of the Code, our policies and procedures, and applicable laws and regulations.

Every Expeditors supervisor, manager, and leader has an additional responsibility to lead by example and ensure that those with whom they work understand the Code (both its letter and its spirit).

You also have a responsibility to report any known or suspected violation of the Code.



What should I know about enforcement of the Code?



Expeditors takes all reports of potential violations seriously and investigates all reported violations.

As appropriate, the Company will protect the confidentiality of those who report a potential violation to the extent it can do so. Expeditors does not permit retaliation against anyone who files a good-faith report of a potential violation. Anyone involved in retaliation will be subject to disciplinary action, up to and including termination of employment.

Any waiver of this Code may be made only by the Board of Directors.

How do I get guidance or raise a concern?

You may get guidance or raise a concern by talking directly with your manager, supervisor, or other relevant leader using our practice of open door access OR by accessing the helpline.

Open door access

Every supervisor's, manager's, and executive officer's door is open to every employee in order to encourage direct communication. If you have a concern, a creative idea, or need guidance, start by talking with your supervisor. You may also use your manager's open door or the open door of any executive officer.

Accessing the helpline

Online expeditors.ethicspoint.com

Helpline

Expeditors also provides a helpline, operated by an independent third party, to enable anyone to report any known or suspected violation of law or the Code. Examples of issues that could be reported include concerns about:

- financial reporting;
- internal controls (such as fraud);
- public disclosure or record retention;
- price fixing or competition law/antitrust matters;
- corruption; or
- improper payments or gifts.

You may use the helpline anonymously. Choosing to provide your name or contact information can be helpful to our investigation of the issues reported, however. In either case, trained, third-party personnel will promptly transmit the information you report to the appropriate Expeditors officials. When you contact the helpline, you will be assigned a control number that will allow you to follow up on the matter, receive updates, or provide additional information, even if you choose not to give your name or contact information.

Questions About the Code

If you have any questions about anything in the Code itself or appropriate actions in light of the Code, contact the Chief Executive Officer, Chief Financial Officer, Chief Ethics & Compliance Officer, General Counsel, or relevant group within the Legal Department.

What else should I know?

If any part of the Code conflicts with any applicable federal, state, local, or international law, the law takes precedence. Expeditors may amend or discontinue the policies described in this Code. You are responsible for checking revisions and updates to the Code. Violations of law, regulation, Expeditors' policies, or this Code are serious matters and may lead to disciplinary action up to and including termination of your employment.



To comply (or comply with) means to observe, respect, follow, and abide by.

Conducting Business with Integrity

By conducting business with uncompromising integrity, you help protect Expeditors, your customers, suppliers, co-workers, and yourself.

Compliance with Law

Anti-Corruption

Conflicts of Interest

Gifts & Entertainment

International Trade: Sanctions, Export Controls, & Anti-Boycott

Antitrust/Competition

Financial Records

Community Activities & Political Contributions



Compliance with Law



In all activities, you must comply with all applicable laws and regulations. Unethical or illegal behavior never serves Expeditors' interests and is not permitted.

How do I comply?

You comply by observing, respecting, following, and abiding by both the letter and the spirit of the laws and regulations that apply to what you do. U.S. laws and regulations specifically apply to all of us at Expeditors because of the Company policy that says we are all "U.S. persons," regardless of our country of citizenship, where we live, where we are located, or where we work.

Where can I learn more?

This Code, as well as the various Expeditors policies specifically referenced in the Code and other policies that may not be individually called out, provides additional information on what laws and standards apply to your business activities. Use our practice of open door access to speak to your supervisor, manager, or other leader. The Legal Department's Compliance group also can provide additional guidance.

Associated Company Policies

1. Authorizations & Powers of Attorney
2. Background Checks
3. Dangerous Goods & Hazardous Materials
4. Denied Party Screening
5. Expeditors as Authorized Importer or Exporter
6. Finance & Accounting
7. Global Air Cargo Security
8. Global Privacy
9. Information Technology Assets & Cybersecurity
10. Known Customer & Known Service Provider
11. Official Government Communications
12. Prohibited & Restricted Commodities
13. Rate Filing
14. Sanctions, Export Controls, & Anti-Boycott
15. Security & Safety
18. Use of Drugs or Alcohol; Social Functions

To comply (or comply with) means to observe, respect, follow, and abide by.

Anti-Corruption

You must comply with the anti-corruption laws of the U.S. and other countries.

For example, if you are pressured to make an unreceipted payment to persuade others to grant permits or make similar favorable business decisions, understand that such payments and activities are almost always unethical and illegal. If you have any question about whether a payment or other action is appropriate, you should contact the Legal Department's Compliance group before making the payment or taking the action.

How do I comply?

You must observe, respect, follow, and abide by the U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act, and all other applicable anti-corruption laws. You may not offer, promise, or pay—or arrange for a third party to offer, promise, or pay—kickbacks, bribes, undisclosed commissions, lavish gifts, unlawful services, excessive entertainment, or anything else of value to any other person for the purpose of exerting improper influence over the recipient; inducing the recipient to violate his or her duties; securing an improper advantage for the Company; or rewarding the recipient for past conduct. Such offers, promises, and payments are prohibited even if you personally make the payments with your own money without seeking reimbursement from the Company. You also may not receive any such improper payments, gifts, or services.

If you become aware of an improper offer, promise, or payment, you must immediately contact the Legal Department or use the helpline to report what you know.

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Anti-Corruption

You must comply with the anti-corruption laws of the U.S. and other countries.

Are there any exceptions?
Legitimate, receipted payments made to a government agency are almost always legal and ethical. But you must never make a payment directly to an individual working for such an agency. This example illustrates the difference: A payment for customs duties paid to the official government customs agency and for which you receive an official receipt is almost certainly proper. On the other hand, an unreceipted payment to John Smith, a government customs official, is quite likely unlawful and improper, regardless of the purpose of the payment. If you have any question about whether a payment or other action is appropriate, you should contact the Legal Department's Compliance group before making the payment or taking the action.

Facilitation payments, which are payments made to expedite or secure the performance of a routine, non-discretionary government action to which Expeditors is entitled, are strictly prohibited.

Where can I learn more?
The Legal Department's Compliance group can provide additional guidance.

Conflicts of Interest

Associated Company Policies

16. Transactions with Related Persons

While you are entitled to manage your personal relationships and financial investments, you must avoid conduct and situations that may conflict, or appear to conflict, with the exercise of independent judgment in the course of your work as an employee of the Company.

Examples of Potential Conflicts of Interest:

- Consulting for a competitor of Expeditors
- Ownership (even just partial ownership) of any provider offering or performing services on behalf of Expeditors
- Doing business on behalf of Expeditors with your family
- Accepting a personal loan from Expeditors
- Accepting a personal loan or service from a service provider of Expeditors

What is a conflict of interest?

A conflict of interest arises where your financial investment, association, relationship, or other connection could impact your objectivity or conduct as an Expeditors employee or otherwise interferes with the performance of your work for Expeditors.

What do I do if I suspect or have an actual or possible conflict of interest?

You must notify your supervisor of any situation that is, or could be perceived as, a conflict of interest when it occurs or, preferably, before it occurs. Disclosure to Expeditors' Chief Executive Officer, Chief Financial Officer, and your supervisor (or manager or other leader) is always part of a responsible approach to a situation involving an actual or possible conflict of interest.

Is it possible to have a conflict of interest with a previous employer?

Yes. If you have signed a confidentiality, non-solicit, or non-compete agreement with a prior employer, notify your hiring contact at the Company or, if transferring jobs within Expeditors, notify your supervisor. Expeditors will respect any such binding agreement.

Where can I learn more?

Use our practice of open door access to speak to your supervisor, manager, or other leader. The Legal Department's Compliance group can provide additional guidance.

Gifts & Entertainment

Gifts and entertainment can help build goodwill in business, but they can also compromise or appear to compromise the ability to make independent decisions. In addition, offering, giving, or accepting gifts and entertainment may raise legal issues.

Can I offer, give, or receive any gift or entertainment? What approvals do I need?

In general, you should avoid offering, giving, or accepting any gift from any party with which the Company does business. Similarly, you should entertain and be entertained only at times and in circumstances authorized by Company policy. You should never entertain or be entertained in a manner that creates an appearance of impropriety. The provision or receipt of gifts or entertainment must be authorized by a direct supervisor, the Chief Ethics & Compliance Officer, or an executive officer of the Company in accordance with Expeditors' policy, no matter how small the value of the gift or entertainment.

Where can I learn more?

Use our practice of open door access to speak to your supervisor, manager, or other leader. The Legal Department's Compliance group can provide additional guidance.



To comply (or comply with) means to observe, respect, follow, and abide by.

International Trade: Sanctions, Export Controls, & Anti-Boycott



One significant responsibility Expeditors faces in operating globally is compliance with all applicable international trade laws and regulations. These include the sanctions, export controls, and anti-boycott laws and regulations of the U.S. and other countries.

How do I comply?

You and anyone acting on behalf of the Company must comply with all applicable sanctions and export controls laws and regulations of the countries in which the Company operates. In addition, you are required to comply with U.S. sanctions laws and regulations even if you live outside the U.S. and are not a citizen of the U.S.; we are all U.S. persons, per Company policy. You may not comply with international economic boycotts in which the U.S. does not participate.

Where can I learn more?

Trade laws and regulations are often complex; Expeditors Sanctions, Export Controls, and Anti-Boycott Policy on the intranet provides additional information. The Legal Department's Compliance group also can provide additional guidance.

Associated Company Policies

3. Dangerous Goods & Hazardous Materials
4. Denied Party Screening
14. Sanctions, Export Controls, & Anti-Boycott

To comply (or comply with) means to observe, respect, follow, and abide by.

Antitrust/Competition



Antitrust and competition laws of the U.S., the European Union, and other countries were enacted to help preserve free markets by promoting competition in the marketplace. Expeditors strongly believes that fair competition and a free market serve the best interests of Expeditors and our employees, shareholders, and customers.

How do I comply?

Expeditors employees, directors, and officers, and anyone acting on behalf of the Company, must comply with all applicable antitrust and competition laws. We must each avoid conduct that could be seen as an attempt to keep market forces from working.

We should never share commercially sensitive information with competitors without prior approval from the Legal Department's Compliance group. Expeditors employees, directors, and officers, and anyone acting on behalf of the Company, who believe they have been involved in or have knowledge of an activity that could give rise to an antitrust or competition law issue should immediately contact the Legal Department.

Examples of Prohibited Conduct

- Agreeing with a competitor to divide or otherwise allocate the market or customers
- Agreeing with a competitor to fix prices
- Collaborating or coordinating with a competitor on a competitive bid
- Agreeing with a competitor to boycott another business
- Discussing commercially sensitive information with a competitor
- Joining a trade association that encourages or promotes anti-competitive conduct

Where can I learn more?

An Antitrust and Competition resource on insite provides additional information to help reduce the possibility of antitrust/competition violations. The Legal Department's Compliance group also can provide additional guidance.

Financial Records & Reports



Expeditors' financial records are the basis for managing our business and fulfilling our obligations to employees, shareholders, customers, suppliers, and regulatory authorities. These records help us provide shareholders and investors with full, fair, accurate, timely, and understandable disclosure in the reports that the Company files to meet legal requirements. Every Company financial record must be valid, accurate, complete, timely, and in accordance with the law to enable us to fulfill those obligations.

How do I comply?

You must comply with the Company policies and internal controls requirements applicable to your job. If you don't know what those internal controls requirements are, speak with your supervisor to learn them. In summary, you must maintain complete and accurate books and records, comply with generally accepted accounting principles, and accurately and timely complete all financial records (including time records, invoices, travel and entertainment receipts, sales records, receipts from governments, and expense reports).

Where can I learn more?

Several related resources are available on the intranet and all provide additional information. For example, there are resources on Financial Reporting, internal controls (Principles of Internal Control and System of Internal Control), and the Document Retention Standards. The Legal Department's Compliance group also can provide additional guidance.

Associated Company Policies

6. Finance & Accounting

17. Treasury

To comply (or comply with) means to observe, respect, follow, and abide by.

Community Activities & Political Contributions



Expeditors encourages all employees, directors, and officers to participate on an individual basis in community and political activities.

Those who do participate in community and political activities do so as individual citizens and not as representatives of Expeditors. You are not authorized to use Expeditors' premises for political or campaign purposes. Similarly, you are not authorized to contribute (either directly or indirectly) Expeditors' funds in support of political or campaign purposes. Expeditors does not directly or indirectly support or endorse political parties, campaigns, or individual candidates.

Where can I learn more?

Use our practice of open door access to speak to your supervisor, manager, or other leader. The Legal Department's Compliance group can provide additional guidance.

Protecting Assets & Information

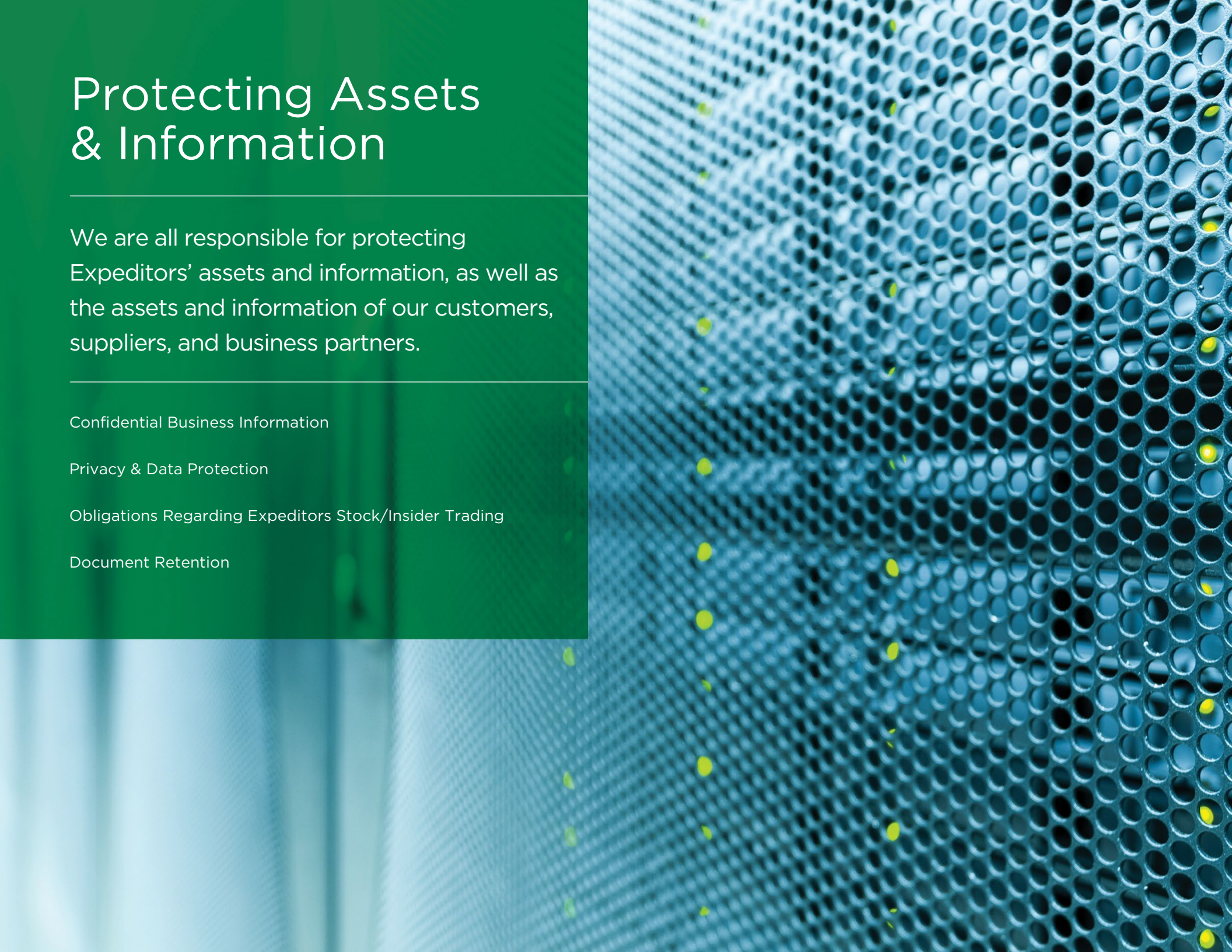
We are all responsible for protecting Expeditors' assets and information, as well as the assets and information of our customers, suppliers, and business partners.

Confidential Business Information

Privacy & Data Protection

Obligations Regarding Expeditors Stock/Insider Trading

Document Retention



Confidential Business Information

Associated Company Policies

2. Background Checks
15. Security & Safety

You are entrusted with our confidential information and with the confidential information of our suppliers, customers, and other business partners. This information is our property, or the property of our suppliers, customers, or business partners, and in many cases was developed at great expense. We take seriously our responsibilities related to the collection, use, and disclosure of this information.

What types of information may be confidential?

Any information relating to Expeditors or its suppliers, customers, or other business partners that we encounter as part of our employment or other association with Expeditors may be confidential. Of particular concern is non-public information that, if disclosed, might be of use to our competitors, or harmful to our suppliers, customers, or other business partners.

Examples of Confidential Information

- Technical or proprietary information about current or future services
- Business and marketing plans and projections
- Information on a customer's commercial invoice
- Internal financial data
- Personal information
- Supply and customer lists

How do I comply?

You must use confidential information only for legitimate Expeditors business purposes and not for personal gain.
You must never discuss confidential information with or in the presence of any unauthorized persons, including family members and friends.
You should also exercise caution when discussing Expeditors' business in public or when reading confidential documents in public places.

If your employment ends at Expeditors, you must return all such information to Expeditors immediately. Your obligations regarding trade secrets and confidential property of the Company is ongoing, even after your employment ends. Do not take files, documents, or any other confidential information with you if you leave the Company.

Only certain individuals are authorized to speak on behalf of Expeditors in response to requests for information about the Company from investors, the press, or other third parties. Always refer any such requests for information to the Chief Executive Officer, Chief Financial Officer, or General Counsel.

Where can I learn more?

Use our practice of open door access to speak to your supervisor, manager, or other leader. The Legal Department can provide additional guidance.

Privacy & Data Protection



Expeditors respects the general right to privacy of all individuals regarding their personally identifiable information ("PII") and follows all applicable laws on the use of PII. In carrying out Expeditors' business, you may collect, use, or have access to PII belonging to our employees, customers, and third-party service providers. Expeditors takes seriously its responsibilities related to the collection, use, and disclosure of this information. Expeditors is committed to respecting the privacy of any PII we collect, use, or otherwise process.

What types of information are protected?
The kind of information that can be PII varies by country. PII often means all data that relates to a natural person (for example, an employee, a customer contact, or a third-party service provider representative), including name, physical address, phone number, and e-mail address. PII can also include business contact information (such as job title, department, and name of employer); country information (for example, from which country is a person accessing Expeditors' web site, www.expeditors.com); usernames and passwords used to access Expeditors' external-facing resources and tools (like exp.o®); and other personal information as may be provided by the customer or third-party service provider representative.

How do I comply?
If you are in a job function where handling PII is part of your responsibilities, you should be aware of and comply with local laws, regulations, and all applicable Company policies. In general:

- PII may only be collected, used, or otherwise processed by lawful means and for lawful purposes and, where required, with the knowledge and/or consent of the person to whom it pertains.
- PII may be used only for business purposes and only in accordance with applicable law and, where necessary, with appropriate consent.
- There are legal restrictions on transferring PII to another party, including to other persons or entities within the Expeditors network. There may be additional legal restrictions on transferring PII outside its country of origin.

Where can I learn more?
The Legal Department can provide additional guidance.

Associated Company Policies

2. Background Checks
8. Global Privacy
9. Information Technology Assets & Cybersecurity
15. Security & Safety

Obligations Regarding Expeditors Stock/Insider Trading



Expeditors is a publicly traded company, as are many of our customers and suppliers.

What is "material inside information"?
Material inside information is any information that has not reached the general marketplace and is likely to be believed important by investors considering buying or selling the securities (stock or shares) of the entity.

Using material inside information for trading securities, or tipping others to trade, is both unethical and illegal.
You are prohibited, directly or through others, from using material inside information relating to the Company or any party with which we do business to buy or sell securities or otherwise take personal advantage of the information. You are similarly prohibited from passing such information on to others. You are also prohibited, directly or through others, from placing or participating in prediction, wagering or betting markets involving the Company or its business.

Where can I learn more?
For more information, refer to the Expeditors Insider Trading Standard (available on the Legal SharePoint site). The Legal Department's Compliance group can provide additional guidance. The Legal Department's Compliance group can provide additional guidance.

Examples of Material Inside Information

- Financial results (branch, Company, product, or other), whether good or bad, not yet announced to the public
- Business activities and volumes
- Proposed mergers and acquisitions
- Sale of major assets
- Changes in dividends
- Extraordinary items for accounting purposes
- Business developments (such as major litigation)

Associated Company Policies
6. Finance & Accounting

Document Retention

Expeditors' records (and the records of all of its subsidiaries, affiliates, business units, and departments) are important to the proper functioning of the Company and are valuable business assets. Knowing what documents and information to keep — and for how long — is an important part of the job at Expeditors.

How do I comply?

You should follow Expeditors' record retention and destruction procedures. You should never destroy or alter any document that is the subject of any pending or threatened proceeding, dispute, or regulatory inquiry.

Where can I learn more?

Expeditors' Document Retention Standards on the intranet provide additional information. The Legal Department also can provide additional guidance.



Associated Company Policies

9. Information Technology Assets & Cybersecurity

To comply (or comply with) means to observe, respect, follow, and abide by.

Fostering a Positive Work Environment

Expeditors' most important asset is its employees. The Company believes that creating and maintaining a positive work environment for employees is essential to our employees' success, operational excellence, and quality customer service.

Equal Opportunity Employment

Harassment & Intimidation

Labor Standards

Security

Health & Safety

Environment



Equal Opportunity Employment



Expeditors is committed to providing all persons an equal employment opportunity.

Our policies are designed to promote fairness and equitable treatment. Unacceptable behaviors include harassment, intimidation, or discrimination of any kind based on race, sex, sexual orientation, gender identity, gender expression, marital status, age, color, religion, creed, national origin, disability, veteran status, or any other characteristic protected under applicable law.

The Legal Department's Employment group can provide additional guidance.

How do I comply?
You should treat your colleagues with respect and demand that others do as well. Supervisors and managers are charged with the responsibility of setting a positive example and enforcing compliance. If you believe that you or another employee has been subjected to discrimination, you should report it immediately to a supervisor, manager, or an executive officer.

To comply (or comply with) means to observe, respect, follow, and abide by.

Harassment & Intimidation



Expeditors believes all employees must be allowed to work in an open, friendly, and non-coercive environment free of harassment and intimidation.

Harassment may be difficult to recognize in certain circumstances. It may consist of favoritism, comments, and/or conduct that create a hostile or intimidating atmosphere and/or an attempt to condition employment benefits on, for example, sexual or other improper concessions.

The Legal Department's Employment group can provide additional guidance.

How do I comply?
If you believe that you or another employee has been subjected to harassment or intimidation, you should report it immediately to a supervisor, manager, or an executive officer.

Labor Standards



Expeditors will not tolerate abuses of applicable labor standards, including any forced, bonded, or compulsory labor or employment of workers below the minimum legal age of employment.

If you believe that you or another employee has been subjected to a violation of applicable labor standards, you should report it immediately to a supervisor, manager, or an executive officer. The Legal Department's Employment group can provide additional guidance.

How do I comply?

You must comply with the applicable labor standards laws and regulations, and all related Company policies, that affect your job. You are responsible for reporting any noncompliance with the laws and regulations of which you are aware to your manager or to an officer of the Company.

To comply (or comply with) means to observe, respect, follow, and abide by.

Security

To protect our employees, our data, and our customers' assets, Expeditors is committed to maintaining secure business operations globally.

We are committed to upholding Expeditors Security Standards (available on the Operational Performance Standards SharePoint site) and the applicable requirements of all governmental supply chain security programs in which we participate.

The Legal Department's Compliance group and the Security, Health & Safety group can provide additional guidance.

How do I comply?

You should immediately report any security incidents to your manager or local security representative. You must comply with Expeditors Security Standards (available on the Operational Performance Standards SharePoint site) and the supply chain security program requirements that apply to our business.



Where can I learn more?

The Security, Health & Safety team can provide additional guidance.

Associated Company Policies

2. Background Checks
7. Global Air Cargo Security
9. Information Technology Assets & Cybersecurity
10. Known Customer & Known Service Provider
11. Official Government Communications
12. Prohibited & Restricted Commodities
15. Security & Safety
18. Use of Drugs or Alcohol; Social Functions

Health & Safety

Expeditors views the pursuit of health and safety as a business priority.

We are committed to providing a safe workplace for all employees and complying with all applicable health and safety laws and regulations.

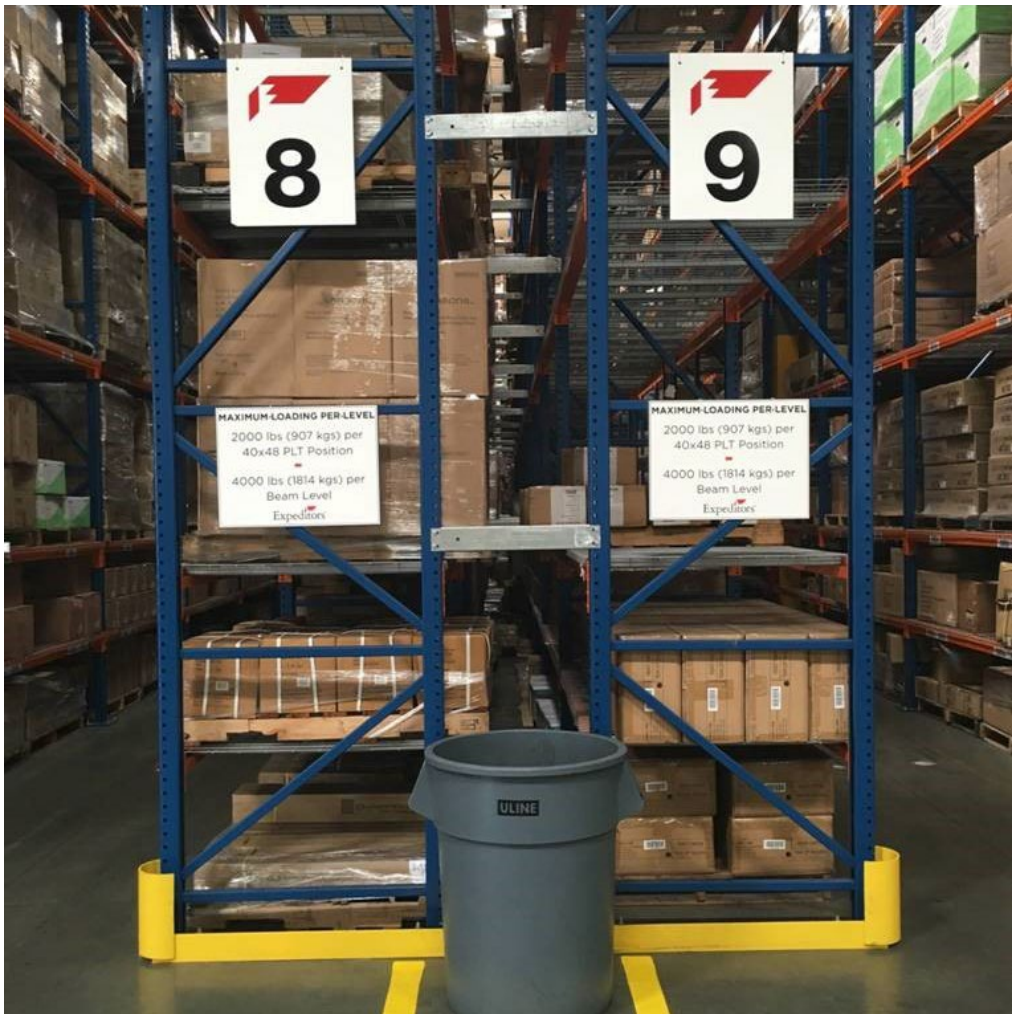
The Legal Department's Compliance and Employment groups, and the Security, Health & Safety group, can provide additional guidance.

How do I comply?

You must immediately report any accidents, injuries, unsafe working conditions, or unlawful conduct, including workplace violence and threatening behavior to your manager, to your local safety representative, or to an officer of the Company. You must comply with Expeditors Safety Standards (available on the Operational Performance Standards SharePoint site) and the health and safety laws and regulations that apply to our business.

Where can I learn more?

The Security, Health & Safety team can provide additional guidance.



Associated Company Policies

3. Dangerous Goods & Hazardous Materials
11. Official Government Communications
12. Prohibited & Restricted Commodities
15. Security & Safety
18. Use of Drugs or Alcohol; Social Functions

To comply (or comply with) means to observe, respect, follow, and abide by.

HELPLINE

Environment



Expeditors views the pursuit of environmental quality as a business priority.

Expeditors complies with all environmental laws and regulations that apply to our business and is committed to maintaining a corporate consciousness that is sensitive to environmental matters.

The Legal Department's Compliance and Employment groups can provide additional guidance.

How do I comply?
Expeditors encourages all employees and service providers to share in its commitment to environmental quality. This can be done through operational improvements and innovative developments that reduce adverse impacts on the environment. Expeditors also offers its employees and service providers many opportunities to become involved in initiatives to support the environment.

Expeditors®

Code of
Business Conduct

If you have any questions about anything in the Code or appropriate actions in light of the Code, contact the Chief Executive Officer, Chief Financial Officer, Chief Ethics & Compliance Officer, or General Counsel.

Accessing the helpline

Online expeditors.ethicspoint.com