

CODE OF CONDUCT

INTRODUCTION BY THE CEO

Corporate integrity, the ethical conduct of business, responsible sourcing, and the safety and wellbeing of workers across the global supply chain are critically important to J.B. Hunt Transport Services, Inc. We expect every supplier we do business with to share and live up to our high ethical standards as described in our Supplier Code of Conduct.

Our reputation and business depend on compliance with these ethical standards and all applicable laws, rules, and regulations. It is also important that you, as a supplier, make yourself familiar with and comply with these ethical standards and laws, rules, and regulations.

The Supplier Code cannot anticipate every issue that may arise, so you should always use common sense and good judgment. If you are uncertain whether conduct is appropriate, you should ask yourself some questions like the following:

- Is it consistent with the Supplier Code?
- Is it lawful?
- Is it ethical?
- Will it reflect well on me and J.B. Hunt?

If the answer to any of these questions is “no,” you should avoid doing it. If you are still uncertain, you should ask for guidance from your employer or contact J.B. Hunt.

In the course of your business with us, if you are ever faced with a questionable situation or suspect non-compliance with laws or ethical standards, it is important that you act promptly to bring it to our attention. We encourage your good faith reporting to your J.B. Hunt contact, the J.B. Hunt Ethics Hotline at 800.582.4724 or the J.B. Hunt Legal Department.

Thank you for making it your priority to uphold these standards in everything you do for J.B. Hunt every day.



John N. Roberts
CEO
J.B. Hunt Transport, Inc.



SUPPLIER CODE OF CONDUCT

J.B. HUNT TRANSPORT SERVICES, INC.

As a supplier of equipment, goods or services (“Supplier”), you must comply with the Supplier Code of Conduct (“Supplier Code” or the “Code”) when conducting business with J.B. Hunt Transport, Inc. or our affiliated companies (“J.B. Hunt”). Your obligations under this Supplier Code are an extension of your other written or legal obligations to J.B. Hunt. You should also take steps to ensure that your agents, sub-contractors, and suppliers also comply with the requirements of the Supplier Code.

The Supplier Code is also available at www.jbhunt.com/our-company/corporate-responsibility/corporate-governance.html. J.B. Hunt reserves the right to update and modify the Code. You are required to familiarize yourself with the content of the Supplier Code and you agree to cooperate with and assist J.B. Hunt in its reasonable efforts to verify that you meet the standards contained in the Code.

REPORT VIOLATIONS

Report any non-compliance with the Supplier Code to your J.B. Hunt contact person, through the J.B. Hunt Ethics Hotline at 800.582.4724 or the J.B. Hunt Legal Department at legal@jbhunt.com. If you report suspected wrongdoing in good faith, you will be protected from retaliation for reporting it. If you self-report a violation, that action will be taken into consideration. You or anyone in your organization can report a violation of the Supplier Code to J.B. Hunt. Reports may be made anonymously, and the reporter’s identity will be protected unless the reporter allows their identity to be known.

FAILURE TO COMPLY WITH THE SUPPLIER CODE OF CONDUCT

Any non-compliance with the Supplier Code is taken very seriously, and, as a Supplier, you are expected to initiate corrective actions to remedy any non-compliance and take appropriate measures to prevent any future reoccurrence. You should maintain books and records to demonstrate your compliance with the Code.

WORKING CONDITIONS

We strongly believe that human rights are fundamental and should always be protected. It is our policy that all people who work for Suppliers, whether directly or indirectly, as employees or subcontractors, or otherwise, must be treated decently and with dignity.

HUMAN RIGHTS

We support and will always work to comply with generally accepted human rights and labor laws. As a Supplier, you must recognize and support equal human rights and take a stand on discrimination, differential treatment, harassment, inappropriate or unreasonable interference with work performance, whether based on race, color, religion or belief, gender, national origin, age, sexual orientation, gender identity, disability (physical, mental, or cognitive), protected veteran status, genetic information, or other bases protected by applicable federal, state, or local law.



SLAVERY AND HUMAN TRAFFICKING

All labor must be voluntary. You must not support or permit any of the following in your operations or in any part of your supply chain:

- compelled, involuntary or forced labor and working conditions resembling slavery or bonded labor;
- full time labor performed by any person under the age of 18 years;
- bonded, indentured, or prison labor; or
- any form of human trafficking.

COMPLIANCE VERIFICATION

You must verify the eligibility for employment of all workers and:

- implement and maintain a reliable system to verify the eligibility of all workers, including age eligibility, and legal status of foreign workers; and
- implement and maintain a reliable recordkeeping system regarding the eligibility of all workers.

IDENTIFICATION PAPERS

As a Supplier you will not require any worker to surrender control over original:

- identification papers or documents giving a foreign worker the right to work in the country;
- identification papers or documents, such as a passport, giving a foreign worker the right to enter or leave the country; or
- documents, such as a birth certificate, evidencing the worker's age.

FINANCIAL OBLIGATIONS

You will not, whether or not as a condition to the right to work, require any worker (or worker's spouse or family member) to, directly or indirectly:

- pay recruitment or other fees or other amounts (monetary or in-kind);
- incur debt;
- make financial guarantees; or
- incur any other financial obligation.

COMPENSATION AND BENEFITS

You must compensate all workers with wages on a regular and timely basis, including overtime premiums, and benefits that at a minimum meet the higher of:

- the minimum wage and benefits established by applicable law;
- collective bargaining agreements;
- industry standards; or
- an amount sufficient to cover basic living requirements.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Employees have the right to join a union and engage in collective bargaining. You must respect, and not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining. You must not discriminate or retaliate against, or discipline or punish, any worker who supports or exercises freedom of association or collective bargaining rights.



ENSURING HEALTH AND SAFETY AT WORK

We expect Suppliers to demonstrate diligence and good judgment in using adequately skilled and trained personnel. You are expected to have implemented procedures to ensure a healthy physical and psychological working environment and to have taken appropriate measures to prevent the use and abuse of alcohol, drugs, etc., by your personnel and suppliers.

ENVIRONMENTAL IMPACT

As one of the leading providers of transportation and logistics services, J.B. Hunt is committed to assuming its share of the responsibility to reduce the environmental impact of the transport industry. We expect you to assume part of our common responsibility for the environment by taking your own initiatives to reduce the environmental impact of your company and your industry.

SUSTAINABLE AND INNOVATIVE TRANSPORT AND LOGISTICS SYSTEMS

Being part of our value chain, you must look for and, to the extent possible, offer sustainable and innovative transport and logistics systems that continually reduce the environmental impact. You should always try to contribute to constant development and improvement to make our services reflect these environmental considerations. Further, we expect you to ensure that any equipment used when providing services is of good and sound quality, meets the general and legally required standard of maintenance and satisfies any safety and environmental regulations or required measures at all times. Finally, you must comply with specific requests, rules and regulations imposed by J.B. Hunt or its customers relating to the service you provide. However, you are not obliged to comply with specific requests that may be contrary to safety regulations or laws or similar regulations in the jurisdictions in or through which the transport is to take place.

CONFIDENTIAL MATERIAL AND INFORMATION

You are not allowed to disclose any confidential or proprietary information received during or after your collaboration with J.B. Hunt to any external parties. Confidential or proprietary information may only be disclosed to a third party if authorized in writing by J.B. Hunt or, if disclosure is required by law, provided that you give J.B. Hunt advance written notice. Confidential and proprietary information includes all non-public information that could be of use or benefit to competitors or be harmful to J.B. Hunt, our customers, suppliers, and others with whom we conduct business if disclosed.

COMPETITION

As with all other legal requirements, it is vital to J.B. Hunt that competition laws are strictly adhered to at all times. To ensure compliance as a Supplier, you must be aware of situations that could have an impact on competition. Regardless of the form, agreements must always be negotiated in accordance with fair competition principles. As a Supplier, you must observe the same degree of diligence and must not enter into in any contracts or agreements, formal or informal, with the purpose or likely effect of substantially limiting competition.



You must not participate in or be a party to any agreement or arrangement that results in:
price fixing;

- market sharing (dividing markets);
- limitation or control of production or capacity;
- disclosure of information on prices or other terms and conditions regarding J.B. Hunt, suppliers or other related third parties;
- collusive agreements on essential terms, rates, fees, charges and conditions between competitors;
or
- any transactions that create a conflict of interest.

ANTI-BRIBERY AND ANTI-CORRUPTION

We expect you to conduct business in an ethical and lawful manner and in accordance with all applicable anti-bribery and anti-corruption laws. These laws include the U.S. Foreign Corrupt Practices Act and all local anti-bribery and anti-corruption laws. The prohibition against bribery and corruption applies without exception. It also applies in countries where bribery is legal or where it is accepted as normal business. You must not accept or offer bribes of any kind. The prohibition against bribery includes the transfer of any kind of assets and is not limited to monetary transfers.

Bribery means any offer, kickback or acceptance of a gift, loan, fee, remuneration or any other item of value to or from another person or entity as an incentive to influence or promote a certain act or omission which would not have been appropriate in the absence of bribery.

Accordingly, the prohibition covers bribery in the form of:

- charitable donations;
- payment of travel expenses;
- delivery of products and/or services;
- disproportionate entertainment expenses; and
- transfer of other personal or financial benefits.

FACILITATION PAYMENTS

Facilitation payments – sometimes also called “grease” payments – are usually made to lower-level public officials to ensure that official performs or speeds up a government or official process, which the official is already duty-bound to perform. Such payments may seem harmless, partly because the sums involved are usually small and partly because they are often regarded as part of local custom or culture. As a J.B. Hunt Supplier, you are strictly prohibited from making facilitation payments in any country by any party. It makes no difference whether facilitation payments are permitted or commonly accepted under local law or local practice. The only exception is when a facilitation payment is made under threat of violence and you reasonably believe that your or another person’s life, health, or freedom is at risk. Mitigating such a risk is not considered a violation of the Supplier Code but must be reported. For more information view J.B. Hunt’s Anti-Bribery and Anti-Corruption Policy at www.jbhunt.com.



GIFTS AND ENTERTAINMENT

You must maintain the highest ethical standards. You must not offer cash, favors, gifts, or entertainment to J.B. Hunt's employees that violate J.B. Hunt's Gifts, Meals, and Entertainment Policy. Generally speaking, gifts with a value of less than \$25 are permissible. If you have a question regarding J.B. Hunt's Gifts, Meals, and Entertainment Policy, please ask your J.B. Hunt contact for a copy of the policy.

COMPLIANCE WITH LAWS

You must comply with all applicable national, state, and local laws and regulations applicable to your business. Where this Supplier Code requires you to meet higher standards than that imposed by applicable law or regulation, you must meet such higher standards.

DOCUMENTATION, AUDIT

You will maintain books and records of your transactions with J.B. Hunt in compliance with applicable law and your written agreements with J.B. Hunt. Except as otherwise provided in your agreement(s) with J.B. Hunt, upon reasonable request you agree to provide documentation or to submit to a verification and certification evaluation by a respected third-party firm if necessary to demonstrate your compliance with the Supplier Code.

