

Code of Ethics



CSX ETHICS HELPLINE: 800-737-1663

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Build a Culture of Integrity

MARCH 2026





A Message from Our President and Chief Executive Officer

CSX Team,

Ethical behavior is essential to our success. It is the foundation of the trust we build with our teammates, customers, shareholders, and the communities we serve.

At CSX, acting with integrity is one of our core values. We follow the rules, we are honest and transparent, and we treat others with respect. Acting ethically strengthens our safety performance, improves the service we provide, and drives sustainable, long-term success for our railroad.

Our Code of Ethics is an important resource to help guide us in making sound decisions every day. If something doesn't seem right, I strongly urge you to speak up by talking to your supervisor, contacting Human Resources, or using the CSX Ethics Helpline.

Please know this: retaliation of any kind will not be tolerated at CSX. We are committed to protecting anyone who raises a concern in good faith.

Thank you for everything you do for CSX and for making ethical choices that help move our company forward.



Steve Angel
President and Chief Executive Officer
CSX

The CSX Guiding Principles

-  Operate Safely
-  Improve Customer Service
-  Drive Continuous Improvement
-  Optimize Asset Utilization
-  Value and Develop Employees
-  Build a Culture of Integrity

Vision

To be the best performing railroad in North America

Values	Behaviors
Work safely 	Protect yourself and each other. Speak up no matter what. Don't cut corners.
Grow through service 	Be a reliable, trusted partner. Operate efficiently to deliver on our promises. Anticipate customer needs to create solutions.
Lead with passion and integrity 	Give your best every day. Act in the interest of all our stakeholders. Respect and learn from diverse perspectives. Be open and transparent.
Create our future as ONE CSX 	Reach across teams to drive progress. Acknowledge each other's work and contributions. Support and develop one another.
Strengthen our communities 	Take pride in our role in society. Positively impact where we live and work. Commit to a sustainable future.

Long-term Strategy
Sustain a ONE CSX Culture
Transform CSX through technology
Generate Profitable Growth Through a Better Customer Experience



Table of Contents

A Message from Steve Angel	2	Our Responsibilities To One Another	15	Our Responsibilities To Protect Information and Assets	33	Our Responsibilities To Comply with the Law	47
		Engagement and Inclusion	15	Responsible Use of Our Assets and Property	33	Working with the Government	47
The CSX Guiding Principles	3	A Harassment-Free Workplace	17	» Fraud and Theft	33	Antitrust and Fair Competition	51
		Safety and Security	19	» Employee Travel and Expenses	35	Anti-Bribery and Combatting Corruption	53
Meeting Our Responsibilities – Applying The Guiding Principles	7	» Preventing Workplace Violence	20	Financial Reporting and Accurate Recordkeeping	37	Insider Trading	55
How to Use Our Code	7	» Drug and Alcohol Use	20	Safeguarding Confidential Information	39	Business Across Borders	57
Who Must Follow Our Code	8	» Security Awareness	20	Acquiring Competitive Information	41	Our Responsibilities To Our Neighbors	59
Value and Develop Employees	8	Protecting Privacy	23	Communicating with the Public and the Media	42	Community Safety	59
Additional Responsibilities of Leadership	9	Our Responsibilities To Our Business Partners	25	» Using Social Media	43	Community Involvement	60
Using Good Judgment, Making Good Decisions	10	Working with Our External Business Partners	25	Artificial Intelligence	45	Environmental Stewardship	61
Accountability	11	» Conflicts of Interest	27			Political Activities	63
Speaking Up	11	» Outside Employment and Financial Interests	27			Important Contacts	65
The CSX Ethics Helpline	11	» Corporate Opportunities	29				
No Retaliation	13	» Family and Friends	29				
Attendance and Availability	14	» Directorships	29				
		Gifts and Entertainment	30				

Meeting Our Responsibilities – Applying the Guiding Principles

Our Code reflects the Guiding Principles and our dedication to integrity in everything we do.

Nothing in this Code is intended to prohibit or interfere with your right to participate as a complainant or witness in a governmental agency investigation including any activities protected under the whistleblower provisions of applicable law or regulations, during which communications can be made without authorization or notification to the company.

HOW TO USE OUR CODE

Our Code of Ethics is designed to build on the Guiding Principles and give you the tools and the resources you need to preserve CSX's ethical culture. This is your resource for information about our company's policies and expectations.

While the Code cannot provide the answer to every ethics and compliance question that may arise in your day-to-day work, it can help you determine the appropriate next steps and guide you to someone who can help. To view the policies referenced in this document, visit the Employee Gateway. Policies are located under CSX Company Information.

Our Internal Audit & Compliance Department oversees both our Code and our Ethics and Compliance Program. Their team helps ensure that our company is meeting our legal and regulatory obligations and that our employees are complying with company policies and procedures.

WHO MUST FOLLOW OUR CODE

Everyone at all levels of our company has a responsibility to know and follow our Code, including:

- All employees and officers of CSX and its wholly-owned subsidiaries.
- All members of the CSX Board of Directors.

Third parties conducting business with or on behalf of CSX can have a direct impact on our reputation through their behavior. For this reason, we want to work with business partners that share our commitment to safety, ethics and compliance. We expect our business partners and their employees to act in a way that is consistent with our Code. We will take the appropriate measures where we believe they have not met our high standards or their contractual obligations.

Waivers of our Code for CSX Board members or executive officers must be approved by the Board and promptly disclosed to shareholders along with the reasons for the waiver.

VALUE AND DEVELOP EMPLOYEES

At CSX, we act with integrity. We make sure employees know what is expected of them and reward them when they do the right things, and always strive to get better. Each of us must take responsibility to act in a safe and ethical manner that is always consistent with the law, regulations and the Guiding Principles. Our responsibilities also include the following:

Knowing the information in this Code and company policies, paying particular attention to the topics that pertain to your job responsibilities.

Seeking help if you are ever unsure of the right course of action and raise concerns about any violations of our Code that you see or suspect.

Treating others with respect and dignity.

Remembering that no one, at any level of the company, has the authority to tell you to do something illegal or unethical.

Never Retaliating against anyone who makes a good faith report of suspected misconduct.

Cooperating fully and honestly in any internal investigations of misconduct.

ADDITIONAL RESPONSIBILITIES OF LEADERSHIP

People in leadership positions at CSX have additional responsibilities:

Leading by example and being a role model for ethical leadership.

Helping employees understand the requirements of this Code, policies and applicable laws.

Creating an environment where employees feel comfortable speaking up.

Listening and responding to concerns when they are raised.

Doing Your Part to make sure that no one experiences retaliation for reporting possible violations or cooperating in an investigation.

Being Consistent when enforcing our standards and holding people accountable for their behavior at work.

For more information about the critical role you play in supporting the Code, see the Supervisor's Guide titled *Ethical Leadership on the Employee Gateway*.

Q & A

As a supervisor, if I observe misconduct in an area not under my supervision, am I still required to report it? I'd rather not get involved.

You are primarily responsible for personnel under your supervision, but all CSX leaders are required to report any misconduct they become aware of and take action. The best approach is to talk first with the supervisor who oversees the area where the problem is occurring. If this doesn't work or isn't feasible, use any of the other resources listed in our Code. Remember: Misconduct at CSX is everyone's problem.



USING GOOD JUDGMENT, MAKING GOOD DECISIONS

Before acting, ask yourself:



ACCOUNTABILITY

A bad decision can result in serious harm to employees or our company. Violations of our Code or company policies may result in disciplinary action up to and including termination of employment. The *Using Good Judgment, Making Good Decisions* guidance chart on page 10 can be a useful tool anytime you're facing a difficult situation.

SPEAKING UP

If you have questions about the Code or concerns about possible violations of other company policies, there are resources to help you.

Start by talking with your supervisor or your Human Resources Business Partner. You can also check the Internal Audit & Compliance Department site on the Employee Gateway for a list of frequently asked questions.

Contact the CSX Ethics Helpline if you can't find the answer to your question or don't feel comfortable speaking with someone directly. You are obligated to promptly raise concerns and report suspected violations of laws and regulations, company policies and the Code.

Sometimes, it may seem easier to say nothing or look the other way if you see or suspect a violation of laws and regulations, company policies or our Code, but doing nothing can have serious consequences. Do your part to raise concerns promptly so they can be addressed. Be assured that the information you provide will be handled confidentially and shared only with those who need the information to investigate and resolve the issue.

THE CSX ETHICS HELPLINE

The CSX Ethics Helpline is operated by an independent reporting service, and you can communicate your concerns via phone or website anytime, day or night, without fear of retaliation. When you contact the CSX Ethics Helpline, you are given the option to remain anonymous. A professional interview specialist will document your information. If you make a report online, a customized Web form will be available to document your concern. This reporting service does not trace phone calls or use caller identification. Reports from your computer come through a secure Internet portal which does not trace screen names.

Regardless of whether you contact the CSX Ethics Helpline via phone or website, you will be given a unique report number that will allow you to check on the status of your report or provide additional information.

**CSX ETHICS HELPLINE:
800-737-1663**

www.csx.com (About US/ Contact US)
24 hours a day, 7 days a week

The independent reporting service will share your information with the CSX Internal Audit & Compliance Department for appropriate follow-up. Reports of financial or accounting misconduct are also reported to the Audit Committee of the Board of Directors.

Q & A

I'm worried that someone might use the CSX Ethics Helpline to falsely accuse me of wrongdoing.

What happens then?

Experience has shown that the CSX Ethics Helpline is rarely used for malicious purposes, but it is important to know that we will follow up on issues reported and anyone who uses it in bad faith with the intent to unjustly damage another person's reputation will be subject to disciplinary action up to and including termination.

NO RETALIATION

We want you to feel free to ask questions and raise issues, secure in the knowledge that you did the right thing in coming forward. CSX strictly prohibits retaliation against anyone who makes a good faith report about a known or suspected violation of our Code. Reporting “in good faith” means that you are sincere in your attempt to provide honest and accurate information, even if you are later found to be mistaken.

Q & A

I thought my supervisor might have awarded a contract to a company owned by his friend, so I anonymously called the CSX Ethics Helpline. I think he knows I reported him and is retaliating since he has stopped copying me on important communications.

What should I do?

Contact your Human Resources Business Partner or the CSX Ethics Helpline to report your concerns.

A thorough investigation will take place. If the investigation determines retaliation is occurring, appropriate action will be taken.

My supervisor is asking me to do things that I believe may violate company policies. I'm afraid she will retaliate if I report her.

What should I do?

You should immediately report any suspected misconduct to your Human Resources Business Partner or the CSX Ethics Helpline. CSX has a strict policy against retaliation for reporting issues in good faith.

ATTENDANCE & AVAILABILITY

Employees are expected to maintain consistent and reliable attendance and availability to perform the essential functions of their positions during scheduled work hours and as business needs require. CSX complies with all applicable federal, state, and local laws, including the Americans with Disabilities Act and the Family and Medical Leave Act, as well as other applicable Company policies and collective bargaining agreements. The Company will not interfere with, discourage, or discipline employees for lawfully using protected leave. However, the following are examples of circumstances that violate CSX's Code of Ethics and that are not protected:

- Misuse of leave including, but not limited to, improperly taking leave before or after rest days, weekends, or holidays to either extend time off or as improper patterned mark-offs
- Dishonesty regarding the reason for an absence
- Utilizing leave for a non-qualifying purpose
- Abuse of sick leave
- Providing fraudulent documentation to support a leave
- Failure to follow established markoff procedures.

Further, subject to applicable law, CSX may take appropriate disciplinary action, up to and including termination for violations of the Code of Ethics. Employees share responsibility for supporting the safe, efficient, and uninterrupted operation of the Company. Maintaining regular work availability is a fundamental part of ethical conduct, teamwork, and professional accountability.



Our Responsibilities To One Another

We believe that every individual is unique and deserving of equal opportunity, inclusion and engagement.

ENGAGEMENT AND INCLUSION

We value the unique contribution that each person brings to CSX. We accomplish more when our teams include people with diverse backgrounds and ideas who can work together in an environment where everyone can contribute and fully utilize their talents.

We offer employment, training, compensation and advancement based on qualifications, merit and business needs, regardless of race, color, religion, sex (including pregnancy, childbirth or related medical conditions), age, national origin, physical or mental disability, veteran status, sexual orientation, gender identity, genetic information or any other basis protected by applicable federal, state or local law.

We are committed to fostering a culture where people feel respected, safe and valued. You can help us reach our goals by making your own commitment to engagement and inclusion.



TO STAY ON TRACK:

- Treat others with respect.
- Demonstrate your commitment to engagement and inclusion.
- Value the contributions of others and listen to their points of view.
- Respect cultural differences.
- Report any acts of discrimination that you see, and do not retaliate against anyone who reports a concern.
- If you supervise third parties, let them know that they are expected to act in a manner consistent with our sense of fair treatment and equal opportunity.

WATCH OUT FOR:

- Discrimination against anyone, including fellow employees, customers, suppliers or any other stakeholders.
- Comments, jokes or materials, including e-mails, which others might consider offensive.

TO LEARN MORE:

Equal Employment Opportunity Policies

Equal Opportunity Policy for Pregnant and Disabled Workers

Vietnam-Era Veterans, Disabled Veterans and the Disabled Policies

A HARASSMENT-FREE WORKPLACE

Teamwork is the foundation of our business. No team can be successful when harassment and discrimination are present. Everyone deserves the freedom to do their job in a professional, respectful environment, free from behavior that creates intimidating, hostile or offensive working conditions.

We do not tolerate any form of harassment. Harassment affects everyone. It is personally offensive, lowers morale and interferes with our ability to work together.

DID YOU KNOW?

Harassment does not have to occur in the workplace or involve a CSX employee to violate our Code or the law.

TO STAY ON TRACK:

- Treat others with dignity and respect; this includes your coworkers, customers, suppliers and any other CSX stakeholders.
- Examine your own behavior, particularly how you treat others.
- Never tolerate sexual harassment including requests for sexual favors or other unwelcome verbal or physical conduct of a sexual nature.
- Avoid comments, jokes or slurs about the race, ethnicity or color of a coworker, customer, supplier or any other CSX stakeholder.
- Maintain a professional work environment. Do not visit inappropriate Internet sites or display sexually explicit or offensive pictures.

WATCH OUT FOR:

- Verbal or physical conduct that harasses another, disrupts their work performance or creates an intimidating, offensive, abusive or hostile work environment.
- Distribution or display of offensive or inappropriate material including written, recorded or electronically transmitted messages (such as e-mail, instant messaging and Internet materials).

TO LEARN MORE:

Anti-Harassment Policies

DID YOU KNOW?

Any employee who has a complaint of workplace harassment against a supervisor, coworker, visitor or other person or believes he or she has been treated in an unlawful, discriminatory manner is expected to bring the problem to the company's attention.

Q & A

A third-party supplier working on our property has been making insulting race-related remarks to a coworker.

What should I do?

Immediately notify your management supervisor, Human Resources Business Partner or the CSX Ethics Helpline so the issue can be investigated and appropriate action taken. CSX does not tolerate any form of harassment by anyone.

SAFETY AND SECURITY

At CSX, safety is a top priority. Every employee is empowered to make decisions and take action necessary to identify and communicate unsafe behaviors and conditions so they can be eliminated or contained. By following all CSX operating rules, procedures and policies, we can safeguard ourselves, our coworkers and the communities in which we operate.

CSX's safety culture allows every voice to be heard and this collaborative environment ensures that the collective experience of all employees leads to an ever safer work environment. Each of us is responsible for our own safety and the safety of others. That means staying alert at all times to potential safety risks. It also involves knowing your job's safety requirements and following all safety and operating rules.

The more we communicate, the better we can respond to any unsafe conditions. Look out for each other. Take time to be safe.

TO STAY ON TRACK:

- Always follow rules and procedures.
- Speak up if you observe unsafe working conditions and listen to others who speak up.
- Never assume that someone else has reported a safety or security concern.
- Explain our safety requirements to anyone coming onto our property, including visitors, customers, workers and contractors.

WATCH OUT FOR:

- Unsafe practices or work conditions.
- Lax or missing enforcement of our safety and security standards.

PREVENTING WORKPLACE VIOLENCE

Violence of any kind has no place at CSX. We will not tolerate:

- Intimidating, threatening or hostile behavior.
- Causing physical injury to another.
- Acts of vandalism, arson, sabotage or other criminal activities.

To the fullest extent permitted by law, unless you are authorized by the company, employees shall not bring onto CSX premises any guns, knives, or other dangerous devices or weapons, whether legally or illegally possessed. Employees shall not carry these items while on CSX premises or conducting CSX business.

In emergency situations or if an act of workplace violence appears to be imminent, immediately call 911. Call the CSX Public Safety Coordination Center at 800-232-0144 as soon as it is safe to do so.

Non-emergency situations, such as suspected threats or acts of violence, should immediately be reported to your supervisor, the CSX Public Safety Coordination Center, your Human Resources Business Partner or the CSX Ethics Helpline at 800-737-1663.

DRUG AND ALCOHOL USE

Abusing drugs and alcohol jeopardizes everyone's safety and impairs work performance. Never possess, use or be under the influence of illegal drugs, alcoholic beverages or other intoxicants at work. Be aware that some prescription drugs can also impair your performance and should be used with care. Refer to the specific rules and restrictions for your particular CSX company for further guidance. Be aware of the CSX Restricted Medication Policy.

SECURITY AWARENESS

You are our first line of defense in ensuring our railroad's security. Report suspicious or unusual activity to the CSX Public Safety Coordination Center immediately at 800-232-0144.

Never put yourself at risk by confronting strangers. Just follow the Three "R's":

Recognize: Learn to spot variations from the routine, such as trespassers or unusual vehicles.

Record: Create a detailed record of your observations.

Report: Report observations of suspicious persons, activities or items promptly by notifying your supervisor or calling the CSX Public Safety Coordination Center.

TO LEARN MORE:

Safety & Railroad Operations

Drug and Alcohol Policies for Management Employees

Drug Free Workplace Policies

CSXT Policy for Personal

Injury/Occupational Illness Reporting

Violence in the Workplace Policies

Anti-Harassment Policies

Q & A

I've noticed some practices in my area that don't seem safe.

Whom should I speak to?

Discuss your concerns with your supervisor. At CSX, raising a concern about safety is never viewed as causing trouble. It is being responsible. If your concerns are not resolved by notifying your supervisor, contact any of the other resources listed in this Code.

My manager asked me to operate a machine I've never been trained on and I'm worried that I might cause damage to the job site or injure someone.

How should I handle this?

Let your manager know that you are uncomfortable operating the machinery. They may not be aware of your situation. As a general rule, you should never operate machinery unless you are properly trained and are sure that you can do so safely.

A coworker has suggested taking shortcuts to make a process go faster, but I'm uncomfortable with the suggestion.

What should I do?

Sacrificing safety for speed is never a good idea – someone could get seriously hurt. Raise your concerns in the safety or job briefing and if the matter cannot be resolved, you should report this matter to your supervisor before permitting the job task.

I heard a coworker make a threatening statement that he would "make his boss pay" if they write him up again.

Should I report this?

Yes. You should immediately notify your supervisor, your Human Resources Business Partner or the CSX Ethics Helpline. You can also contact the CSX Public Safety Coordination Center to report this concern. If it appears that an act of violence is imminent or occurring, immediately call 911.

PROTECTING PRIVACY

We understand the importance of safeguarding the privacy, confidentiality and security of personal information and other private data and we comply with all applicable privacy and data protection laws.

Remember to guard all personal information as carefully as you would want yours guarded.

TO STAY ON TRACK:

- If your job gives you access to employees' private, personal information, such as payroll or medical records, be sure to keep it secure and treat it confidentially.
- Whether or not your job involves access to private information, if you ever come across such information, do not share it with anyone inside or outside of CSX without permission, and report it to your Human Resources Business Partner.
- Only use employee records for legitimate business purposes.

WATCH OUT FOR:

- Situations where private, personal information may be unintentionally seen or overheard by others such as on phone calls or while working on your laptop.
- When sending personal data to others, including third parties, make sure that the transmissions are for legitimate business reasons to necessary persons, that they comply with the law and that you follow CSX information management security guidelines.

TO LEARN MORE:

Information Management Policy

Information Security and Privacy Policy

Q & A

I found a document on the copier that contains confidential personnel records, including payroll information. I don't want to get anyone in trouble, but I don't think it's right that this kind of information is left for all to see.

What should I do?

Promptly report this to your Human Resources Business Partner. Protecting confidentiality and privacy is the responsibility of every CSX employee.



Our Responsibilities To Our Business Partners

We believe in earning our business partners' trust by demonstrating ethics and integrity in every decision we make.

WORKING WITH OUR EXTERNAL BUSINESS PARTNERS

Our external business partners make significant contributions to our success. These relationships reflect the Guiding Principles and are based on integrity, ethical conduct and trust. We expect you to deal fairly with our customers, suppliers and anyone else working with us.

All procurement decisions are based on the best total value received by CSX. When you work with current or potential suppliers, be sure to work with the appropriate contacts in the Procurement & Supply Chain Management Department.

TO STAY ON TRACK:

- Protect the confidential and proprietary information of external business partners.
- Make supplier-related decisions in the best interest of CSX, not for any personal benefit or gain for you or a family member.
- Make sure external business partners understand and follow our expectations for safety, ethics and compliance and how our standards apply to their interactions with CSX.

WATCH OUT FOR:

- Signs that our external business partners are violating applicable laws or regulations or not upholding CSX's standards of safety, ethics and compliance.
- Any situation that may appear to involve a conflict of interest and remove yourself from making or influencing a procurement decision.

TO LEARN MORE:

Procurement & Supply Chain Management Policies

OUR EXPECTATIONS

We expect our external business partners to share our high standards of business conduct and meet the following basic standards:

- Compliance with applicable laws and regulations.
- Safety and security.
- A commitment to environmental protection.
- No participation in corruption.
- Respect for human rights.

CONFLICTS OF INTEREST

A conflict of interest may exist whenever we have a competing interest that interferes with our ability to make an objective decision for CSX. Each of us is expected to use good judgment and avoid situations that can lead to even the appearance of a conflict which can undermine the trust others place in us and damage our reputation.

TO STAY ON TRACK:

- Always make business decisions in the best interest of CSX.
- Discuss with your supervisor any situation that could be perceived as a potential conflict of interest such as having a family member who works for CSX or one of our suppliers.
- Think ahead and proactively address situations that may put your interests or those of a family member in potential conflict with CSX.

TO LEARN MORE:

Seek guidance from your supervisor or contact the Internal Audit & Compliance Department.

Procurement & Supply Chain Management Policies

Nepotism & Fraternalization Policies

Information Security and Privacy Policy

HOW DO I SPOT A POSSIBLE CONFLICT OF INTEREST?

Ask yourself:

- Could my interests interfere with CSX's interests?
- Will I, a family member or friend receive improper personal gain or beneficial treatment because of my position in the company?
- Would this activity appear to be a conflict to someone else, either inside or outside of the company?

If you answer yes to any of these questions, you may have a real or potential conflict.

ALWAYS KEEP IN MIND:

Be alert for situations including the following, which are common examples of potential conflicts of interest:



OUTSIDE EMPLOYMENT AND FINANCIAL INTERESTS

- Always disclose and discuss outside employment with your supervisor and Human Resources Business Partner. If approved, you need to ensure that this outside activity does not interfere or detract from your work at CSX.
- Outside employment or a financial interest with a company that competes with CSX, violates our confidentiality, is illegal or would reflect badly on our company is never allowed. This applies to family members as well.
- Do not accept a paid or unpaid leadership role with any publicly traded organization without obtaining prior written approval.

CORPORATE OPPORTUNITIES

- Never take any business action related to CSX for personal benefit, or for the benefit of a family member or friend, without approval from your department head.
- The use of company equipment or resources to support personal ventures is never allowed.
- You cannot take advantage of business opportunities you discover through the use of corporate property, information or your position.

FAMILY AND FRIENDS

- On occasion, it is possible that you may find yourself in a situation where you are working with a close friend or relative who works for a supplier or competitor. Since it is impossible to anticipate all situations that may create a potential conflict, you should disclose your situation to your supervisor.
- We want to ensure that the most qualified candidates are recruited, selected, hired and retained by the company. For this reason you should not try to improperly influence the company's recruiting or hiring to benefit your family members or friends.

DIRECTORSHIPS

- You may not serve as a director, trustee or officer, or in a similar paid or unpaid governance position, for any publicly traded corporation or large, privately held commercial entity without prior written approval.
- You do not need approval to serve in governance positions for non-profit, community, charitable, political or social organizations, provided your service does not conflict with CSX interests or reflect negatively on CSX.
- To avoid actual or perceived conflicts of interest, you should not participate in any decisions relating to whether CSX should provide financial or other support to organizations with which you are affiliated.

Q & A

I'm dating a CSX employee who is being transferred to my business unit. Is this a problem?

It depends on the business relationship that will exist between the two of you when the transfer occurs. You need to review the situation with your supervisor and Human Resources Business Partner to determine if additional steps need to be taken.

One of my direct reports is the part owner of a construction company, but he isn't involved in the day-to-day operations of the business... Is it okay to use this company to do some home repairs?

No. Supervisors should not engage in any financial transactions with their subordinates since this can create the appearance of a conflict, regardless of your intentions.

A supervisor has begun purchasing materials from a company that is owned and operated by his stepdaughter, since she is the only supplier in the area. Is this allowable?

In general, the purchase of materials and services from family members should be avoided due to the perception of a conflict of interest. Report the issue to your supervisor or the CSX Ethics Helpline if you suspect a potential conflict of interest.

Is it against company policy for me to perform consulting for my previous employer?

It depends on the situation. You should obtain approval from your supervisor in advance to ensure there are no perceived conflicts of interest and the consulting does not violate any company policies.

GIFTS AND ENTERTAINMENT

Gifts and entertainment can be used to build goodwill between CSX and our business partners; however, some gifts and entertainment may conflict with Company values.

Business decisions should never be influenced by gifts or entertainment, nor should there be an appearance of such influence. Supplier and business partner selections, as well as decisions by our customers, must rely on objective criteria like price, quality, service, and value.

Gifts and entertainment accepted from or provided to third parties should be infrequent.

TO STAY ON TRACK:

Gifts and entertainment accepted or provided must:

- Have a legitimate business purpose
- Be consistent with Company values and policies
- Be infrequent
- Comply with all applicable laws and regulations
- Not knowingly conflict with the policies of the receiver

- Be discussed with your supervisor if they exceed \$150 or you have concerns regarding the appropriateness of a gift or entertainment
- For Accepted Gifts and Entertainment only: Both must be disclosed through the Gift and Entertainment Reporting Tool and approved by vice president of the department or above if the reasonably estimable value exceeds \$150 OR if the cumulative value from a single vendor or supplier exceeds \$300 annually.

WATCH OUT FOR:

Certain Gifts Are Never Acceptable:

- Gifts of cash, cash equivalents, gift certificates, gift cards, stock, bonds, stock options, or loans accepted from or provided to third parties
- Gifts requested or offered in exchange for personal gain or unfair business advantage
- Gifts accepted or provided that influence or give the appearance of influencing business judgments
- Gifts that are illegal, sexually oriented, or that would violate our commitment to treat others with respect and dignity
- Discounts not available to all CSX employees

- Gifts, including gratuities, favors, or anything of monetary value, that are solicited or offered in situations involving outside parties/entities that are currently involved (or expect to be involved) in transactions/contracts involving government funds

TO LEARN MORE:

Third Party Gifts and Entertainment Policy
 CSX Corporation State and Local Lobbying Guidelines for Employees
 CSX Employee Travel & Expense Policy
 Gift and Entertainment Reporting Tool

DID YOU KNOW?
 You must obtain VP approval to receive any gift or entertainment valued at more than \$150, and disclose it using the new Gift and Entertainment Reporting Tool.

 In addition, if the total value of gifts or entertainment from a single third party exceeds \$300 within a 12-month period, disclosure in the Reporting Tool is required, regardless of individual gift amounts.

Q & A

A CSX consultant offered me tickets to a sporting event they will not be attending. Is this considered entertainment?

No. This is considered a gift since the consultant is not going with you to the event. The tickets are subject to CSX’s gift limit of \$150.

I received a \$50 restaurant gift card from a customer for helping them with an issue. Can I accept the gift card?

No. Employees cannot accept gift cards from third parties, regardless of the dollar amount.

A supplier offered to cover my registration fee to attend an industry-related conference. Can I accept the offer?

All offers to attend industry conferences and trade shows should be discussed with your supervisor and approved by vice president of the department or above. In some cases, if you have been invited to speak, it is appropriate to allow the conference organizers to cover or waive the registration fee. In most cases, however, if your supervisor believes it is a good use of your time to attend the conference or trade show, CSX should pay the registration fee and related travel expenses.

GIFTS AND ENTERTAINMENT – GOVERNMENT OFFICIALS

Can I pay for the lunch of a governmental agency official that is on-site for a meeting?

Not for federal government employees, and probably not for state employees. Does the official work for the federal government or a state or local government? What specific state government? Are they an elected official, an appointed official or a civil servant? Do they work for the executive or legislative branch? Rules involving gifts to government officials are complex so you should always consult with the VP Government Affairs or the Law Department prior to offering government officials anything of value.

Our Responsibilities To Protect Information and Assets

It is important that we protect our resources from loss, damage and misuse.

RESPONSIBLE USE OF OUR ASSETS AND PROPERTY

When you joined CSX, you became a steward of our resources, and we must all use these resources responsibly. Theft, carelessness, misuse and waste of company property have a direct impact on profitability.

Our assets and property include: our name and brand, funds, credit cards, computers, phones, equipment, vehicles, information (including e-mail), software, technology and processes. Even your time is considered an asset when you're at work. All of these assets are meant for CSX use, and not for personal use or gain.

FRAUD AND THEFT

Fraud and theft are crimes and can cause lasting damage to our reputation as well as our bottom line. Fraud and theft are completely contrary to our culture and the Guiding Principles. We do not tolerate this activity under any circumstances by anyone working at or on behalf of CSX.

Fraud is an intentional misrepresentation of fact that deceives or is intended to deceive another individual or entity for financial or personal gain.

Fraud can take the form of offering false or fictitious information, reports or claims to another person. It also includes taking unfair advantage of someone either through manipulation, concealing something, misusing inside information or misrepresenting facts. Some examples of workplace fraud may include:

- Misrepresentation on timesheets or expense reports.
- Abusing or misusing company equipment, material, property or credit cards.
- Dishonest accounting practices.

Theft includes stealing, misuse of assets for personal or non-business reasons or using assets without permission. For CSX, theft usually involves stealing materials and supplies, equipment or scrap.

Remember that CSX is your company, and acts of fraud and theft impact your company in a variety of ways. We're depending on you to help us identify these activities before harm is done.

TO STAY ON TRACK:

- Use good judgment to safeguard our assets from misuse or waste.
- Do not remove company tools, equipment, inventory or scrap from CSX property for personal purposes.

- Always use computer resources responsibly and primarily for CSX business purposes – any personal use should be reasonable and kept to a minimum.
- Do not use our equipment or information systems to create, store or send content that violates any of our policies, such as discrimination, harassment, and threats of violence or is from inappropriate websites.
- Do not share passwords or allow other people, including friends and family, to use CSX resources.
- Respect the copyrights, trademarks and license agreements of others when dealing with printed or electronic materials, software or other media content.

ALWAYS KEEP IN MIND:

- Employees are expected to work efficiently during working hours and make the best use of the time and resources provided.
- Company assets should be used for legitimate business purposes and should not be used for non-company business.
- Follow company procedures on the Employee Gateway for a secure way to send large files to people outside of CSX.

- Be aware of the risks associated with inappropriate e-mail use.
 - Don't send e-mails to people who do not have a legitimate need to receive them.
 - Avoid using large distribution lists and the "reply to all" feature.
 - Don't retain e-mail longer than needed.
- When using e-mail to transmit information that may contain company business plans or any other confidential or proprietary information, exercise caution and transmit it using a secure method.
- The company will take appropriate disciplinary action if electronic communications contain content that is unlawful, inappropriate or inconsistent with CSX policies.

TO LEARN MORE:

Information Security and Privacy Policy
 Employee Travel & Expense Policy
 Procurement & Supply Chain Management Policies
 Guidelines for CSX Business Property Use
 Philanthropy, Volunteerism, Solicitation and Use of Company Resources for Charitable Purposes

DID YOU KNOW?

CSX may monitor employee use of its computer resources and information systems, including reviewing documents, files, e-mails and attachments.

EMPLOYEE TRAVEL AND EXPENSES

The Employee Travel & Expense Policy is designed to establish the guidelines for allowable expenses incurred by employees while conducting CSX business and to ensure compliance with applicable tax and legal regulations. CSX employees should be sure that all travel is undertaken in the most economical mode consistent with this policy. Employees are expected to exercise the same degree of discretion and good judgment as would be exercised with any other expenditure of company funds.

Personal charges are not permitted on the Travel & Expense card, the Corporate Lodging card, the fuel card, or any corporate credit cards. Take time to familiarize yourself with the Employee Travel & Expense Policy prior to using these cards or making travel arrangements to ensure you comply with the policy.

An itemized receipt is required for every Corporate Credit Card purchase. This applies to all transactions, including travel-related charges, in-store purchases, and online purchases.

Submitting fictitious receipts, reporting inaccurate mileage, falsifying who accompanied you to a meal and fabricating the business purpose of an expense are considered fraud. Follow the guidelines listed in the Employee Travel & Expense Policy when submitting expenses for reimbursement and clearly document the nature of the business expenses.

Prohibited One Card Purchases:

The following items are not permitted:

- Non-essential or personal items
- Snacks for primary work location
- Gift cards
- Chemicals, tools, PPE
- Furniture
- Company vehicle maintenance or fuel
- Large technology equipment or services (such as cell phones and software)
- CSX Swag (unless approved by a vice president or above)
- Alcohol (except for customer entertainment or with approval from a vice president or above)

Q & A

My supervisor has determined that my personal side business does not pose a conflict of interest with my CSX work.

Is it okay to use my work computer and phone to conduct my personal business as long as it is done at lunch or after hours?

No. Even though there is no conflict of interest with your side business, you have an obligation to use CSX assets including telephone, fax, e-mail and computer software primarily for CSX business. Employees are not permitted to use CSX assets to support a second job or consulting effort.

I'm working on sensitive documents and sometimes store them in a folder on the X drive, but I am not sure if it is well-secured. Is that okay?

No. You should ensure that the folder is secure before storing sensitive documents there. If you have any questions, contact the CSX Technology Service Desk.

FINANCIAL REPORTING AND ACCURATE RECORDKEEPING

Business partners, government agencies and the public rely on the accuracy and completeness of our financial statements, disclosures and business records. Accurate information is also essential within the company for making good decisions.

Our books, records and accounts must be stated accurately and fairly represent financial transactions. They must be in compliance with accepted accounting principles, our internal controls, and be approved at the appropriate level. Employees with a role in financial or operational recording or reporting have a special responsibility in this area, but all of us contribute to the process of recording business results and maintaining records.

TO STAY ON TRACK:

- Make sure that any business information you report is accurate, complete and timely. This includes accurate recording of revenue, expenses, payroll and benefits records, regulatory data and other business information.
- Only sign documents that are correct, complete and truthful. Providing false or misleading records or altering records is always wrong and can be a serious violation of the law.
- Record items, such as revenue or expenses, in the time period in which they apply.
- Ensure the coding of and accounting for transactions accurately reflects the nature of the business.
- Ensure that transactions are not altered in any way to avoid Chart of Authority approval limits.
- Delegate approval authority sparingly ensuring subsequent review of items approved on your behalf.

ALWAYS KEEP IN MIND:

- Make sure that any spending you do results in good value for our company. Remember you have an obligation to create accurate and detailed expense reports and to use corporate credit cards and company assets only for approved business purposes.

- Cooperate with and provide accurate information to internal or external auditors or investigators.
- Promptly report suspicious transactions or activities and refer questions relating to these topics to the Internal Audit & Compliance Department or the CSX Ethics Helpline.

TO LEARN MORE:

Employee Travel & Expense Policy
Procurement & Supply Chain Management Policies
Chart of Authority Policy

DID YOU KNOW?

Because CSX is a public company, it is especially important that our public disclosures, including filings with regulatory authorities such as the Surface Transportation Board, U.S. Securities and Exchange Commission and other stock exchanges be complete, fair, accurate, timely and understandable. If they aren't, we could face fines and penalties.

Q & A

A coworker split an invoice into two payments because he didn't want to bother his department head with approving a large invoice. This isn't a problem since his direct supervisor is approving the two smaller invoices, right?

Splitting transactions in order to avoid a higher level of approval is strictly prohibited and could result in disciplinary action. Employees are also not permitted to ask vendors to split invoices into smaller increments.

I saw a coworker sign off on an inspection report when he hadn't actually done the inspection. Can I ignore this?

No, falsifying records is never appropriate. Report this immediately to your supervisor or the CSX Ethics Helpline.

SAFEGUARDING CONFIDENTIAL INFORMATION

One of our most valuable assets is information. Our records and information are company resources that are essential to sound business operations. This information is not available to the public, and it includes business information that we have developed as well as customer, supplier and other business partner information, which they have entrusted to us.

Examples of confidential information include:

- Sales, marketing and other corporate databases.
- Marketing strategies and plans.
- Personnel records.
- Medical records.
- Research and technical data.
- Bids and proposals.
- New product or service developments.
- Trade secrets such as inventions or processes.

We also respect the personal data of customers and our business partners. We follow data protection laws, which may apply to personal information we obtain when conducting CSX business. We do not share this information with anyone outside of CSX without written permission.

DID YOU KNOW?

Protecting confidential information means taking reasonable physical and electronic precautions to protect it. Never put that information at risk by storing it or accessing it on personal devices such as personal phones, laptops or other computing devices without the required security software.

TO STAY ON TRACK:

- Each of us must do our part to protect confidential information. This means keeping it secure, limiting access to those who have a need to know, and avoiding discussion of it in public areas.
- Always follow our Information Management Program.
- Remember that CSX's confidential information belongs to CSX, even if it is something that you developed. You may not use this kind of information for personal gain.

ALWAYS KEEP IN MIND:

- Even when you leave CSX, you have a responsibility to maintain confidentiality and protect our information.

- We need to be especially careful if our job requires us to work with confidential information of employees or customers. This may include information including social security numbers, addresses, phone numbers, and medical or financial information.
- Records may be placed on a legal hold due to requests from government agencies or other third parties. The company also has obligations to preserve certain records when it is involved in litigation. If you receive a legal hold notice, do not destroy these records until the legal hold is released and in compliance with CSX's records retention schedule. Legal hold procedures are located on the Employee Gateway.

TO LEARN MORE:

Information Management Policy

Information Management Procedures and Guidelines

Information Security and Privacy Policy

DID YOU KNOW?

CSX's Information Management Program is available to help you manage records and information efficiently and according to company policy. It helps us ensure that records are created, managed and disposed of according to legal recordkeeping requirements and business needs. It includes a records retention schedule that governs specific periods of time that you must maintain information relevant to our operations for business, legal or regulatory purposes.

Q & A

I overheard a conversation about a new deal that CSX is about to announce. Is it okay to let my brother know about it?

No. Sharing any CSX confidential information is strictly prohibited.

ACQUIRING COMPETITIVE INFORMATION

Businesses today are under increasing pressure to find out as much as they can about their competitors. At CSX, we are committed to avoiding even the appearance of impropriety when acquiring information about a competitor.

DID YOU KNOW?

Legitimate sources of competitive information include:

- Newspapers, trade press accounts and other public information.
- Discussions with customers (but not to obtain competitors' confidential information).
- Information publicly available on the Internet.
- Reputable consultants and analysts who are reporting on publicly available information.

TO STAY ON TRACK:

- Never engage in fraud, misrepresentation or deception to obtain competitive information. For example, never try to obtain competitive information by pretending to work elsewhere.

- Understand how to gather competitive information legally and ethically. If someone shares confidential information that was obtained inappropriately, do not use it for your own gain or for CSX's gain.
- Make sure that third parties acting on our behalf live up to our standards.
- While CSX sometimes hires former employees of competitors, we never ask them to disclose, nor do we accept from them, any confidential or proprietary information from their previous employers.

ALWAYS KEEP IN MIND:

- We must never use a competitor's confidential or proprietary information. If you discover what you believe may be confidential or proprietary information from another company, seek advice from the Law Department.
- Not all information you uncover about our competition will be accurate, even publicly available information. Be sure to verify any piece of competitive data before using it.

TO LEARN MORE:

If you have questions regarding whether gathering certain competitor information is appropriate, consult the Law Department.

COMMUNICATING WITH THE PUBLIC AND THE MEDIA

It is important that our public communications are clear, consistent, and responsible.

Whenever we talk to others about CSX, we represent the company. What we say reflects on CSX, and it can have an impact on how others view the company.

For this reason, all of us need to be careful in our public communications and must always be respectful, honest, and transparent in accordance with the Guiding Principles and policies.

TO STAY ON TRACK:

- Never speak publicly on issues involving the company without prior authorization.
- All requests for company information, interviews, or commentary must be referred to the appropriate CSX personnel.
- Refer all requests for investor-related information to the Investor Relations Department at (904) 359-2255 or InvestorRelations@csx.com.
- All media inquiries — including those from journalists, bloggers, podcasters, influencers, and representatives of digital or traditional outlets — must be promptly referred to the Media Relations team via email at MediaTeam@csx.com.
- Only authorized spokespersons may respond to media requests.
- This ensures our messaging is consistent, accurate, and aligned with our corporate objectives.

WATCH OUT FOR:

- Making it appear as if you are speaking on behalf of the company in your personal communications, including in e-mails, blogs, message boards and social networking sites.
- Invitations to speak “off the record” to reporters or others who ask you for information about company affairs.

USING SOCIAL MEDIA

Be careful when writing communications that might be published online.

When you use social media never give the impression that you are speaking on behalf of CSX. Think carefully before you hit the “send” button. Keep your electronic communications professional and positive. Assume the whole world can read them.

When using social media:

- Respect the privacy of your coworkers and our customers and suppliers. Get permission from those you plan to mention in the social space before posting comments, tags or photographs.
- Guard our internal information about projects, customers and earnings. Understand that some of our initiatives provide a competitive advantage to the company.
- Protect our brand image. We are all proud of the work we do and the impact we have on the communities we serve. Our brand encompasses these values, and it is how we communicate the Guiding Principles to others.
- Respect the law, including those that cover defamation, discrimination, copyrights and harassment.

- Be aware that your posts are subject to and should not violate CSX’s Anti-Harassment Policies.
- Remember that everything you post may be visible to everyone, so never post any confidential information about other employees, customers or suppliers.

If you see something posted that could be potentially harmful to CSX, report it immediately. Don’t feel obligated to respond to negative comments yourself. All comments on the official CSX social media channels are subject to our Social Media Policy.

TO LEARN MORE:

[Anti-Harassment Policies](#)

[Social Media Policy](#)

[Social Media Guidelines](#)

Q & A

A CSX employee posted confidential information about an upcoming project on Facebook.

Should I say something?

Yes, notify your supervisor or the CSX Ethics Helpline. Remember that confidential business information about projects, customers and suppliers provides us a competitive advantage. Once posted, it is visible to everyone, so never post confidential business information about CSX.



ARTIFICIAL INTELLIGENCE (AI)

Artificial Intelligence (AI) refers to computer systems or software that can perform tasks typically requiring human intelligence. These tasks include recognizing patterns, making predictions, understanding language, analyzing data, and even making decisions.

In a business context, AI is commonly used to automate repetitive processes, analyze large volumes of data for insights, enhance customer service through chatbots, or optimize logistics and scheduling. At CSX, AI is a tool to help us work smarter, safer, and more efficiently — when used responsibly and in line with our company's values and policies. While CSX has many tools and safeguards in place, it is the responsibility of all AI users to verify outputs of AI systems before relying on information.

TO STAY ON TRACK:

- **Use Only Approved AI Tools:** Always use AI tools that have been reviewed and approved by CSX Technology. The list of approved tools is maintained by CSX Technology and specifies which types of data each tool is certified to handle. If you are unsure whether a tool is approved, check the AI Tools List or contact CSX Technology before proceeding.

- **Protect Confidential and Sensitive Data:** Never upload, process, or share confidential, proprietary, or sensitive information (including customer, employee, or business data) with any AI tool unless you have explicit permission from CSX Technology and the tool is certified for that data type.
- **Act with Integrity and Accountability:** Use AI in ways that reflect CSX's values — integrity, transparency, respect, and safety. Ensure that AI systems support business goals while protecting the interests of employees, customers, and communities. Make it clear to others when AI is used to generate work product.
- **Promote Fairness and Non-Discrimination:** AI systems must be designed and used to avoid unfair bias or discrimination. Regularly review outcomes for fairness and seek assistance from CSX Technology, the CSX Law Department, and/or the Ethics Helpline if corrective action is needed.
- **Maintain Human Oversight:** AI is a tool to support — not replace— human judgment. Always ensure appropriate human review, especially for high-impact or sensitive decisions.

DID YOU KNOW?

- **AI Use is Monitored:** CSX monitors the use of AI tools to ensure compliance with policy and to protect company data and systems.
- **Reporting Concerns:** If you become aware of unapproved AI tools being used, or if you have concerns about AI-related risks, report them to your supervisor or the CSX Ethics Helpline.
- **Policy Applies to All:** The AI Use Policy applies to all employees, contractors, and third parties working with CSX systems or data.

WATCH OUT FOR:

- **Unapproved AI Tools:** Do not use AI tools, bots, or integrations that are not on the approved list. This includes meeting note-taking or transcription tools unless specifically authorized.
- **Unauthorized Data Uploads:** Never upload or process regulated, confidential, or sensitive data with any AI tool without prior written approval.
- **Lack of Transparency:** Avoid using AI systems whose operations or decisions cannot be explained to relevant stakeholders.
- **Overreliance on Automation:** Do not allow AI to make decisions without

appropriate human review, especially in areas affecting people, safety, or compliance.

- **Third-Party Risks:** When using external AI tools or services, ensure they meet CSX's standards for ethics, security, and compliance.
- **Intellectual Property Theft:** Generative AI (Gen AI) is a type of AI that uses algorithms to generate new, original content such as text, images, video, and audio. Do not use Gen AI to produce content that may violate intellectual property rights of the Company, suppliers, or other third parties. Never upload or process proprietary CSX code, copyrighted materials, or trademarked content in any AI tool without explicit permission.

TO LEARN MORE:

- AI Use Policy
- Information Security and Privacy Policy
- CSX Technology Service Desk:
To report incidents related to AI systems or outputs.

SUMMARY:

At CSX, responsible use of Artificial Intelligence means using only approved tools, protecting sensitive data, and ensuring that AI supports our values of integrity, fairness, and safety. If in doubt, ask for guidance before using AI in your work.

Our Responsibilities To Comply With the Law

Taking responsibility for our actions and honoring the law are an integral part of our culture.

WORKING WITH THE GOVERNMENT

Special rules apply when the government is our customer or business partner. We can face severe penalties including loss of current and future government contracts, monetary penalties and even criminal charges for violating government procurement laws.

DID YOU KNOW?

Complex rules govern the giving of gifts, entertainment and other business courtesies to government officials. What may be permissible for commercial customers may be illegal when dealing with the government. If you have questions, contact the Law Department.

TO STAY ON TRACK:

- When working with the government, be aware of their policies as well as ours. Know how their policies may impact our relationship.
- Contact the Law Department regarding non-routine government requests for information, including attorney general or inspector general requests or subpoenas.
- If you suspect any illegal or unethical conduct by a CSX employee or business partner in connection with a government contract, report it immediately to your supervisor, the CSX Ethics Helpline or the Law Department.

ALWAYS KEEP IN MIND:

If you are involved in any aspect of a government contractual relationship, you have additional responsibilities including the following:

- Conform strictly to contract specifications and all quality, quantity, delivery and testing requirements.
- Make sure that all of our invoices, statements and representations to government officials are accurate, truthful and complete. Also ensure charges fully comply with applicable procurement rules and contract requirements.

- Be truthful and accurate in all representations and certifications made to government customers and never falsify any document or provide misleading information relating to the award, performance or payment under any government contract or subcontract.
- Never seek, discuss or accept a competitor's bid or proposal, or an agency's source selection information from any government agency or other source, before the relevant agency awards the contract.
- Do not initiate any employment discussions with any current or former government employee without first consulting the Law Department.

TO LEARN MORE:

If you have any questions about requirements associated with government-related contracts, contact the Law Department.

Q & A

I noticed the wrong number of hours were charged to a government project, but I didn't fix the error.

A few hours aren't a big deal, are they?

Yes, they are. All charges to government projects must be accurate and complete. It is essential that payroll charges are coded to the correct government project. Misstatements can have serious consequences including fines and penalties and loss of current and future contracts.

Does the Buy America contract requirement apply to CSX since much of our rail is purchased or manufactured outside the U.S.?

Yes, it does. Buy America is a series of federal statutes and regulations that apply to all federally funded construction projects and requires use of domestic steel and iron products (and in some instances, manufactured products). If you are

not sure how Buy America applies to a particular project, check the government contract or check with the Law Department.

What is a suspended or debarred vendor?

Do I have to check for this?

A suspended or debarred vendor is ineligible to work on federal aid construction projects. The federal government maintains a list of these vendors, and CSX has processes in place to avoid use of suspended or debarred vendors or contractors. If you suspect that a contractor or vendor on a federal construction project is or may be suspended or debarred, please contact the Law Department.



ANTITRUST AND FAIR COMPETITION

Antitrust laws are designed to preserve the competitive process and the free market. Violations of these laws can result in severe penalties for our company and for the people involved. The rules around competition affect nearly every aspect of our business. Each of us has a responsibility to avoid conduct that could in any way be perceived as unlawfully interfering with competition.

DID YOU KNOW?

Competition laws may also be referred to as “antitrust,” “monopoly,” “cartel” and “price fixing” laws. All are designed to preserve free and open competition.

TO STAY ON TRACK:

- Be extra careful in discussions with competitors. We often work with other railroads with which we interline freight, with trucking companies for intermodal services, and even with water carriers for some moves, but conversation that wanders into inappropriate subjects with them can lead to violations of antitrust laws.
- Never unfairly disparage a CSX competitor, a vendor/supplier or their services.
- Do not encourage a customer to break a contract with a competitor.
- Antitrust laws are complex and compliance requirements can vary depending on the circumstance. If you have any questions, or if you see a potential violation of antitrust policies, contact the Law Department.

ALWAYS KEEP IN MIND:

You might interact with competitors through industry meetings, conferences, and other events. When you do, be careful to avoid even the appearance of an inappropriate agreement. You should avoid discussing any of the following topics:

- Discussions with a competitor about prices, except for joint line rates (sometimes called “through rates” or “interline rates”). This prohibition

includes agreements about matters affecting prices, such as demurrage terms, credit terms and other “price-like” commercial terms.

- Dividing customers, sales territories, or lines of business between competing companies.
- Agreements to “rig” bids or refuse to bid to reduce competition.
- Agreements that condition the offering of one product or service on a requirement that the customer also purchase another, different product or service without Law Department approval.

TO LEARN MORE:

If you have additional questions about policies or the laws pertaining to antitrust and fair competition, contact the Law Department.

Q & A

During a trade association meeting, I was present when two of our competitors were discussing their low profit margins and complaining about deep discounts. I said nothing, but a few weeks later both competitor companies raised their prices.

Should I have intervened at the meeting?

It might be determined that everyone at the meeting – whether they took part in the conversation or not – agreed to fix prices, even though there was never an explicit agreement. If you find yourself in this kind of situation, say that you feel the conversation is inappropriate, leave the meeting and tell the Law Department immediately.

ANTI-BRIBERY AND COMBATING CORRUPTION

Bribery and corruption have no place in our business and are illegal in every country where we operate. They can cause irreparable harm to our good name and to the communities where we do business.

Our standard is clear: we do not pay bribes or kickbacks, at any time for any reason. This applies equally to any person or firm who represents the company including consultants, suppliers, distributors and sales agents.

DID YOU KNOW?

Key Definitions:

Bribery – Giving or receiving undue value (or offering to do so) to influence the behavior of someone in government or business in order to obtain business or financial or commercial advantage.

Corruption – The abuse of an entrusted power for private gain.

Facilitation Payments – Payments to a government official intended to encourage the official to perform his or her responsibilities.

TO STAY ON TRACK:

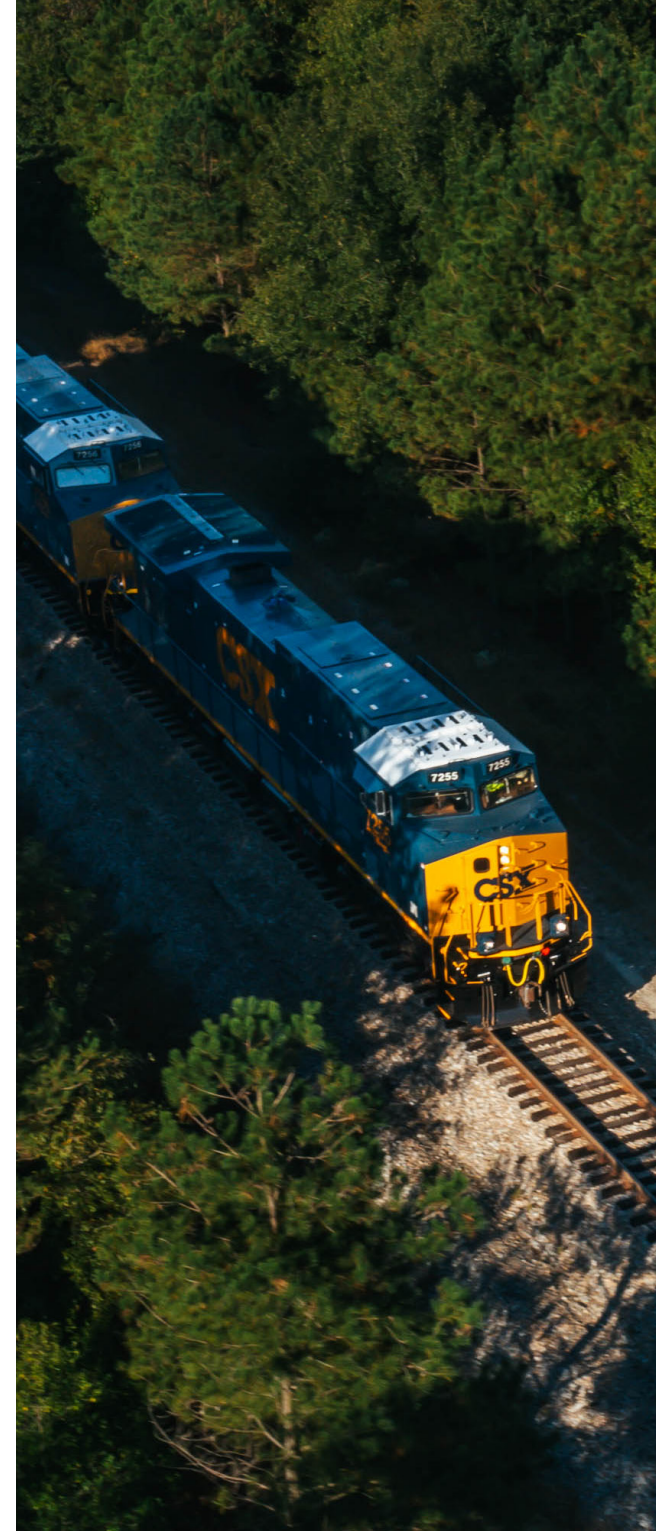
- Never offer, promise or give anything of value that could appear to be a payment – something that might encourage or reward someone for a decision to retain or obtain business.
- Never request, agree to receive or receive a financial or other benefit from someone as an encouragement to do something improper on his or her behalf.
- Accurately and completely record all payments to third parties.
- It is especially important that we carefully monitor third parties acting on our behalf. We must know who they are and what they are doing. If you supervise third parties, make sure they understand that they are required to operate in strict compliance with our standards and to maintain accurate records of all transactions.

WATCH OUT FOR:

- Apparent violations of anti-bribery laws by our business partners.
- Agents who do not wish to have all terms of their engagement with CSX clearly documented in writing.

TO LEARN MORE:

If you have additional questions about policies or the laws pertaining to bribery and corruption, contact the Law Department.



INSIDER TRADING

Each of us is prohibited from trading securities or passing information on to others who then trade (“tipping”) on the basis of material nonpublic information.

DID YOU KNOW?

- In general, information is considered material if a reasonable investor would consider it important in making a decision to buy, sell or hold securities.
- Any information that could be expected to affect a company’s stock price should be considered material.
- Information is **nonpublic** if it has **not** been released broadly to the market, for example, through widely disseminated company communications or press releases.

TO STAY ON TRACK:

- Do not communicate material nonpublic information to other people.
- Never buy or sell securities in any company while in possession of material nonpublic information.

WATCH OUT FOR:

- Requests by friends or family for information about CSX or companies that we do business with or have confidential information about. Even casual conversations could be viewed as illegal tipping of inside information.

TO LEARN MORE:

Insider Trading Policy

If you have additional questions about Insider Trading, contact the Law Department.

Q & A

Through my work at CSX, I found out that a customer is likely to merge with another company. Since this information isn’t about CSX, can I take this as a tip and buy some of their stock?

No. Trading in securities of another company based on information you received while working at CSX is considered insider trading and is a violation of securities laws. You could face serious penalties and fines.



BUSINESS ACROSS BORDERS

As a U.S.-based company, we comply with U.S. trade regulations in every international transaction and respect the policies of the countries where we do business. We expect all of our business partners to do the same.

Although trade laws are complex, we depend on you to help us comply with all applicable U.S. laws governing imports, exports and how we conduct business with non-U.S. entities.

These laws contain limitations on the types of products that may be imported into the U.S. and the manner of importation. For example, we cannot export products or services to countries that are embargoed or boycotted by the U.S. government, and we cannot participate in a boycott of a country that is friendly to the U.S. We also may not sell to certain persons and entities for specific uses or release certain kinds of technology.

We must also follow anti-terrorism laws, which forbid us from conducting business with individuals or entities who may be involved in terrorist activities. CSX also will not accept funds that are derived from unlawful sources or activities.

TO STAY ON TRACK:

- Always be truthful, accurate and complete with all records regarding international transactions.
- Understand and comply with the laws in the country where you are working as well as any additional laws that deal with imports, exports or transportation.
- Report to the Law Department if you know of anyone, including partners, customers or employees, who has violated or intends to violate U.S. or international laws.

WATCH OUT FOR:

- Situations where the laws of more than one country may apply in a cross-border transaction. In such situations, contact the Law Department for guidance.
- Changes in trade, import and export laws. Trade restrictions and sanctions often change. If you are involved in cross-border transactions, make sure you are up-to-date on the relevant rules.

TO LEARN MORE:

If you have additional questions about trade, import or export requirements, contact the Law Department.



Our Responsibilities To Our Neighbors

CSX demonstrates responsible leadership in safeguarding our environment and the communities we serve.

COMMUNITY SAFETY

We want to be a trusted neighbor in the communities where we live and operate. Safety is a top priority at CSX, and safe business operations are a primary goal.

We stay engaged with local communities and work with them to monitor our performance and provide emergency planning assistance, including helping to train local fire, police and emergency response personnel.

TO STAY ON TRACK:

- Do your part to ensure that we operate in a way that protects the safety of our customers and the communities we serve.
- Observe all rules and practices and follow instructions concerning safe and efficient work practices.
- Notify your supervisor immediately if you see a work practice or activity you think is unsafe.
- If you are ever unsure of what to do in a particular situation, request help from your supervisor.

ALWAYS KEEP IN MIND:

- You are the eyes and ears of CSX. Take action if you see conditions that may pose a hazard or risk to employees, customers or the community.
- Speak up if you see a work practice or activity you think is unsafe.

TO LEARN MORE:

Safety & Railroad Operations
Community Affairs & Safety

COMMUNITY INVOLVEMENT

CSX and our employees have a reputation of being good citizens and neighbors, improving the lives of people across the CSX network. We believe in maintaining the health and welfare of these communities and recognize that charitable contributions and volunteerism are important components of this commitment.

Many of our employees support charitable causes and non-profit organizations and we want to encourage that sense of civic responsibility and pride. While this activity is welcomed, keep in mind that it is strictly voluntary and has no bearing on your performance evaluations or employment at CSX.

The company supports employee-driven charitable involvement through the Pride in Service Volunteer & Giving Center by providing access to a variety of programs that support the community through volunteerism, direct charitable giving and matching gifts.

Please remember that you may not use company resources beyond the Volunteer & Giving Center for individual

charitable giving. This includes document printing, broadcast and distribution list e-mails, lobby or common area spaces or interoffice mail. Posters and announcements regarding these activities are permitted on break room bulletin boards.

For more details about the CSX giving philosophy, giving guidelines and the company's policies on fundraising and volunteerism, refer to the Pride in Service Volunteer & Giving Center. Select Volunteer and Giving Center under Featured Links on the Employee Gateway.

TO STAY ON TRACK:

Being a good citizen should not have a negative impact on our company. You are encouraged to do your part using your own time and resources unless participating in a company-authorized project or event.

ENVIRONMENTAL STEWARDSHIP

We promote environmental stewardship and sustainability throughout the organization. Simply complying with environmental regulations isn't enough — we strive to exceed them with sound practices that protect the health and safety of our employees and the public while reducing our impact on the environment. The actions you take every day can have a big impact on our ability to sustain the environment for future generations. As you work, let your actions be guided by CSX's Environmental Policy.

Being part of the ONE CSX culture means no job is so urgent and no task so critical that we cannot take the time to perform it in legal compliance with environmental regulations. Whether you are a seasoned railroader or new to the team, you are empowered to be a champion of environmental stewardship. The following Critical Environmental Rules are designed to safeguard employee health, protect the environment, and uphold CSX's compliance standards:

- Immediately report all spills to the Public Safety Coordination Center 800-232-0144.
- Never move leaking equipment unless it is to protect public safety or reduce environmental impact.

- Manage ties and other railroad materials in a manner that protects waterways and other sensitive areas).
- Never initiate any activities that may require a permit without first contacting Environmental Field Services (EFS). These activities may include (but are not limited to): construction, excavation/soil disturbance or backfilling, tie chipping, rock crushing, ballast cleaning, fixed generator installation, gravel placement, dewatering, demolition or any activity that may impact a wetland.
- Never wash equipment or vehicles on CSX property unless approved by EFS.
- Never misuse chemicals or cleaners.
- Never burn, bury, store, transport, or dispose of any waste improperly.
- Never initiate a yard cleaner event without first contacting EFS.
- Never operate equipment unless appropriate dust control devices are fully implemented as designed.
- Never disturb Asbestos-Containing Materials.

TO LEARN MORE:

CSX Environmental Policy

Employee Environmental Guidelines

Environmental Land and Track Lease Policy

Q & A

I noticed an odor coming from a railcar, but I don't see anything leaking. Should I report this?

Yes. When you detect a potentially harmful environmental situation such as strange odors, spills and leaks, you must report it immediately so we can respond right away. Contact the Public Safety Coordination Center at 800-232-0144 to report the issue.

I observed a sheen or discoloration in the creek behind our shop. It looks like it is coming from a company nearby. My coworker says it's not our problem. What should I do?

Any pollutants discharged in water, such as spills and leaks of any material, must be reported immediately to the Public Safety Coordination Center at 800-232-0144 so the issue can be promptly investigated.

I noticed some crossties in a small stream adjacent to our tracks. It looks like they have been there a while. What should I do?

Any pollutants such as ties, soil, oils, chemicals, fill materials, etc., in water or on an embankment, must be reported immediately to the Public Safety Coordination Center at 800-232-0144 so the issue can be promptly reported to regulatory agencies and addressed.

My team has track work scheduled and we will not have water in time to supply the water sprayers on the equipment. What should I do?

Excessive dust emissions create regulatory violations and community impacts. They are also obvious and easy to identify, so enforcement is often swift and severe. If dust control devices will not work as designed, another measure of dust control must be implemented or the work rescheduled.

POLITICAL ACTIVITIES

Employees have the right to voluntarily participate in the political process including making personal political contributions. However, always make it clear that your personal views and actions are not those of the company. In addition, you must never use CSX funds, assets or resources to support any political candidate or party unless specifically authorized by the Government Affairs Department in coordination with the Law Department.

CSX exercises its right and responsibility to make its position known on relevant public issues and legislation. When lobbying and participating in the political process, we always follow applicable laws and regulations.

TO STAY ON TRACK:

- Obtain all necessary approvals before using any company resources to support political activities.
- Ensure that your personal political views and activities are not viewed as those of the company.
- Do not use company time, resources or funds to support your political activities, including supporting any employee who runs for office.
- Never give the impression that CSX supports any candidate, campaign or issue in which you are personally involved.
- Remember: Federal, state and local laws governing lobbying and contacts with government representatives are complex. Always follow CSX policies and if you have any doubt, contact the Law Department before acting.

ALWAYS KEEP IN MIND:

- By law, we may not contribute company funds, either directly or indirectly, to any federal and many state and local campaigns, candidates, parties or committees. Prohibited contributions may violate government ethics and lobbying laws and state and local “pay to play” laws.

- Political or charitable contributions could be perceived as attempts to gain favor or to exert improper influence.
- Politics are personal. Feel free to get involved, but don’t force your views on your coworkers.

TO LEARN MORE:

CSX Corporation State and Local Lobbying Guidelines for Employees

CSX Corporation Employee Political Activity Policy

Federal Campaign and Fundraising Guidelines – PAC Fundraisers for Candidates

Guidelines for CSX Business Property Use



Important Contacts

Issues or Concerns:	Contact:	Contact Information:
Actual or suspected misconduct, questions, or concerns about ethics and compliance matters, or employment discrimination or harassment.	CSX Ethics Helpline and Website	Call toll-free: 800-737-1663 (available 24 hours a day, 7 days a week) Or go online: https://secure.ethicspoint.com/domain/media/en/gui/26907/index.html
Employee service center to answer questions related to employee policies, career opportunities, training classes, benefits, compensation and leaves of absence.	CSX Employee Service Center	Call toll-free: 800-633-4045 Or send an e-mail to: EmployeeServiceCenter@csx.com
The EAP is available to assist employees with psychological problems, anxiety or depression, relationship problems, substance abuse, work-related concerns, stress or critical incidents.	Employee Assistance Program (EAP)	Call toll-free: 800-657-3366 (available 24 hours a day, 7 days a week)
Federal affairs, legislation, lobbying, and regulations or questions related to state or local ethics and lobbying compliance.	Government and State Relations	For federal level issues, call: 202-626-4927 For state or local level issues, call: 904-366-5005
Human Resources-related issues and concerns, including employment discrimination or harassment.	Human Resources	Contact the Human Resources Business Partner for your department.
Accounting, financial reporting, internal controls or auditing matters. Also to discuss potential fraud-related issues, ethics issues or Code of Ethics questions.	Internal Audit and Compliance	For accounting, financial reporting, internal controls, or auditing matters, contact: Vice President Internal Audit 500 Water Street, C901 Jacksonville, FL 32202 904-366-5309 For ethics and fraud-related issues: Director Investigations & Ethics 904-366-4774

Issues or Concerns:	Contact:	Contact Information:
Questions from the investment community, security analysts or portfolio managers.	Investor Relations	904-359-2255 Or send an e-mail to: InvestorRelations@csx.com
Advice or to report written or oral requests by government agencies for information or the receipt of a subpoena from a government agency.	CSX Employee Service Center	Call toll-free: 800-633-4045 Or send an e-mail to: EmployeeServiceCenter@csx.com
Media and public relations questions, concerns or issues.	Media Relations	MediaTeam@csx.com
Railroad emergencies, including blocked crossings or track, crossing accidents, crossing signal problems, spills and materials releases, theft, vandalism, trespassing or unsafe employee driving.	Public Safety Coordination Center (PSCC)	800-232-0144 (available 24 hours a day, 7 days a week)
Customer inquiries regarding ordering cars or tracking cars and shipments.	ShipCSX	877-744-7279
Security of CSX computer information or resources, or possible virus infections.	Technology Service Desk	RNX 279-1111 800-243-7743
Non-emergency public issues and complaints, including general environmental inquiries, rough crossings, operations issues, property management inquiries, rail fan requests and public safety concerns.	PSCC	www.csx.com / About Us / Contact Us