

SWIFT TRANSPORTATION COMPANY

ISSUE RESOLUTION POLICY

Updated as of December 22, 2016

SCOPE

This Issue Resolution Policy (the “Policy”) applies to all employees and officers of Swift Transportation Company (the “Company”), and employees of the Company’s subsidiaries, including part-time, temporary and contract employees (collectively, “Employees”).

PURPOSE

The Company is committed to the highest standards of ethical, moral and business conduct. Further, the Company recognizes that the integrity of our financial information in particular is critical because such information guides the decisions of our Board of Directors and management, and is relied upon by the Company’s stockholders, employees and business partners. In line with this commitment to integrity and our commitment to open communication, this Policy provides an avenue to raise concerns regarding questionable accounting, internal accounting controls, auditing matters and the reporting of fraudulent financial information, as well as other conduct that is illegal, improper or otherwise not in accordance with Company policy. This Policy is also intended to reassure employees that they will be protected from dismissal or retaliation for whistleblowing in good faith. Notwithstanding any of the provisions herein, nothing in this Policy is intended to prohibit or prevent an employee from contacting an appropriate government agency with a concern.

POLICY

The Company expects and encourages all Employees to report any known or suspected questionable accounting or auditing matters, or other illegal or improper conduct relating to the Company. Employees may submit good faith reports of such information without fear of dismissal or retaliation of any kind. This Policy is intended to cover reporting of items including:

- Questionable accounting or auditing matters;
- Unlawful actions by any Company employee or representative in violation of any state or federal law or agency;
- Violations of Company policy, including our Code of Business Conduct and Ethics, and Securities Trading Policy; or
- Any other serious improper or unethical conduct related to the Company.

As used in this Policy, the phrase “questionable accounting or auditing matters” includes, but is not necessarily limited to, suspected or known acts of: (1) fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company; (2) fraud or deliberate error in the recording and maintenance of financial records of the Company; (3) deficiencies in or noncompliance with the Company’s internal accounting controls; (4) misrepresentation or false statement to or by a senior officer or accountant of the Company regarding any matters contained in the

financial records or any financial or audit reports of the Company; (5) misappropriation of Company funds; or (6) deviation from full and fair reporting of the Company's financial condition.

SAFEGUARDS

Reporting in Good Faith

This Policy is intended to protect Employees who comply with this Policy in good faith. This Policy does not protect any Employee who makes, files, takes any action, or causes the making, filing of, or taking of any action with respect to, an Initial Report (i) in bad faith, (ii) not in good faith, (iii) with a malicious intent, (iv) solely regarding their own misbehavior, and/or (v) knowing that such Initial Report is false or baseless ("Bad Faith Acts"). Filing an Initial Report in which the suspected conduct reported is determined to be proper conduct does not, in and of itself, constitute a Bad Faith Act.

Engaging in a Bad Faith Act is a serious offense and a violation of this Policy. Any Employee who engages in a Bad Faith Act will be subject to appropriate disciplinary action, up to and including termination.

No Retaliation

The Company strictly prohibits retaliation against any person who makes a report in good faith or participates in any investigation of a report in accordance with this Policy. Employees who believe they have been subjected to dismissal or retaliation for having submitted a complaint or for participating in an investigation relating to such a complaint should immediately report the concern to either a member of the Company's Legal Department or the Audit Committee. This includes, but is not limited to, (i) harassment; (ii) victimization; (iii) intimidation; and/or (iv) adverse employment-related consequences, which may take the form of (a) job assignment or reassignment, in each instance with adverse or perceived adverse implications, (b) promotion with adverse or perceived adverse implications, (c) demotion, (d) compensation-related actions or inactions with adverse or perceived adverse implications, (e) training with adverse or perceived adverse implications, (f) discipline, (g) suspension, and/or (h) termination.

Any complaint of retaliation will be promptly and thoroughly investigated and, if substantiated, appropriate disciplinary action will be taken, up to and including termination.

Confidentiality of Complaints

If the identity of any person reporting a complaint under this Policy (a "Reporting Person") is known, unless such Reporting Person has authorized the Company to disclose his or her identity, the Company shall not disclose the identity of such person unless: (1) such disclosure is determined by the Audit Committee to be required to complete the investigation of the complaint; (2) such disclosure is required by law; or (3) the Audit Committee determines such complaint was made in bad faith. In all cases, unless otherwise determined by the Audit Committee Chair, other members of the Audit Committee, the Company's General Counsel and Chief Financial Officer will have access to all information contained in the complaint, including the Reporting Person's identity.

Anonymous Allegations

The Company encourages employees to attach their names to allegations to facilitate appropriate follow-up questions and investigation, which may be more difficult if the source of the information is not identified. However, complaints may be submitted on an anonymous basis. Unless necessary to complete the investigation of the complaint, legally required, or if the Audit Committee determines such complaint was made in bad faith, neither the Company, the Audit Committee nor any director, officer or employee of the Company shall attempt to ascertain the identity of any person who makes a report anonymously.

PROCEDURE

Process for Submitting a Complaint

Complaints should be reported by one or more of the following methods:

1. Complaints may be submitted in writing using the form attached as Exhibit A and forwarded to the Company's General Counsel of Swift Transportation Company, 2200 S. 75th Ave., Phoenix, AZ 85043;
2. Complaints may be submitted by sending an e-mail to whistleblower@swifttrans.com containing the information called for by Exhibit A;
3. Complaints may be submitted orally by calling the Ethics and Compliance Hotline at 1-844-882-3813;
4. Complaints may be submitted through the Ethics Portal at swifttrans.ethicspoint.com; or
5. In the event an employee is not comfortable sending a complaint to the Company's General Counsel, a report may be made to the Chair of the Audit Committee of the Board of Directors by sending a letter to: Chair of the Audit Committee, Swift Transportation Company, 2200 S. 75th Ave., Phoenix, AZ 85043.

Employees are free to report matters using any of the methods identified above on an anonymous basis. The e-mail box and online and telephone reporting systems will be monitored only by the Company's General Counsel or a designated compliance attorney in the Legal Department, along with the Director of Internal Audit.

Employment-related or any other Company concerns not related to the matters described above should continue to be reported through normal channels, including an employee's supervisor or the Company's Human Resources Department. Nothing in this Policy is intended to affect the right of any person to submit a complaint or issue directly to any governmental agency, such as the Securities and Exchange Commission.

Timing

We encourage our employees to report concerns as soon as possible so that timely action may be taken.

How the Complaint Will Be Handled

All reports made under this Policy will be taken seriously. The action taken will depend on the circumstances of the specific complaint or issue. The Company has designated its General Counsel or his/her designee in the Legal Department (the “Compliance Reviewer”) to coordinate the initial Company action in response to a report as outlined below.

Review

1. Upon receipt of a complaint, the Compliance Reviewer will make an initial determination regarding the manner in which the complaint will be reviewed.
2. If the complaint relates to an accounting or auditing matter or to illegal conduct, the complaint will be forwarded to the Audit Committee Chair and an investigation will be conducted in an expeditious manner, taking into account the nature and complexity of the complaint and the issues raised therein, with oversight by the Audit Committee Chair.
3. If the complaint does not relate to an accounting or auditing matter or to illegal conduct, the Compliance Reviewer will conduct an initial inquiry to determine whether an investigation is appropriate and the form that it should take. Some concerns of this nature may be resolved without the need for a full investigation.
4. Unless otherwise determined by the Audit Committee Chair, with respect to any accounting or auditing matter, the investigation team will include the Company’s General Counsel and/or the Compliance Reviewer; the Director of Internal Audit; the Chief Accounting Officer; and the Chief Financial Officer, who will be responsible for developing and executing a plan of investigation. If the complaint relates to illegal conduct, the investigation team will include the Company’s General Counsel and such other officers as the Audit Committee Chair shall determine. If the complaint relates to any senior executive officer, the investigation team shall include members of the Audit Committee and any other individual the Audit Committee determines should be included.
5. Following each investigation, the investigation team shall report to the Audit Committee Chair if there is a finding of any questionable accounting or auditing matters.

6. If the investigation report indicates a finding of any questionable accounting or auditing matters, the investigation report shall also include a recommendation for prompt and appropriate remedial action.

Response to Complainant

If the Employee submitting a complaint chooses to identify himself or herself, the Employee will be given an acknowledgment that the complaint was received. An Employee submitting a Complaint may be given additional information regarding the disposition of the review in the discretion of the Company's General Counsel and/or the Audit Committee Chair.

Report to the Audit Committee

All investigation reports shall be made available to the full Audit Committee at its next regularly scheduled meeting, unless the Audit Committee Chair determines that a more immediate report is warranted.

Further Information

The amount of contact between an Employee submitting a Complaint and the investigating team will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the Employee submitting the complaint.

Retention of Records

The Company's General Counsel or Compliance Reviewer will maintain a record regarding the reported concern in accordance with the Company's Document Retention Policy, including the investigation and resolution thereof.

The Company reserves the right to modify or amend this policy at any time as it may deem necessary, including any modifications that may be required to maintain compliance with state or federal regulations, the rules and regulations of any stock market or exchange where the Company's stock may be listed, and/or to accommodate organizational changes.

EXHIBIT A
SWIFT TRANSPORTATION COMPANY
ISSUE RESOLUTION POLICY
REPORT FORM

Your Name: _____

Division/Department: _____

Supervisor: _____

Telephone: _____

Mobile: _____

E-Mail: _____

Describe violation and all relevant facts of the violation: _____

Date you became aware of violation: _____, 20__

Violation is:

_____ Ongoing

_____ Completed

_____ Unclear whether ongoing or completed

Division/Department suspected of violation: _____

Individual(s) suspected of violation: _____

How did you become aware of the violation? _____

Describe any steps you took prior to completing this Complaint Form (e.g., informed supervisor): _____

Who, if anyone, may be harmed or affected by the violation? _____

If possible, estimate the amount of loss to the Company as a result of the violation:

Actual: _____ Potential: _____

Please provide any suggestions for remedying the violation: _____

Do you wish to be contacted by the Company's investigation officers regarding the status of the investigation?

_____ Yes _____ No