

ARCBEST CORPORATION AND SUBSIDIARIES INSIDER TRADING POLICY

Revised January 18, 2019

1. Summary.

a) Trading Restrictions

Under applicable federal and state securities laws, members of the Board of Directors (“Directors”) and all employees of ArcBest Corporation and its subsidiaries (the “Company”) are prohibited from trading in the Company’s securities (for their own or related accounts) while in possession of material, non-public information relating to the Company.

In order to avoid even the appearance of impropriety, the Company’s policy (“Policy”) is to prohibit Directors and certain restricted employees (see “Restricted Employees”) from trading in the Company’s securities except during four “trading windows” each year (see “Trading Window”) or pursuant to a valid Rule 10b5-1 plan.

“**Restricted Employee**” means an employee of ArcBest Corporation (“ArcBest”) or any subsidiary who is required to acknowledge in writing this Policy because:

- They help compute, receive a copy of, distribute or have access to, the ArcBest or subsidiary financial statements in printed or electronic form.
- They are a subsidiary’s President and/or Chief Executive Officer.

“**Rule 10b5-1 plan**” means a written plan for trading securities of the Company that is designed in accordance with Rule 10b5-1(c) of the Securities Exchange Act of 1934, as amended.

“**Trading Window**” means the period (i) beginning at the opening of trading on the third (3) business day after the Company publicly announces its quarterly results of operations (or full year results with respect to the fourth quarter), and (ii) ending on the fifteenth day of March, June, September and December. Example: Press Release on Friday, January 22, Trading Window opens Wednesday, January 27 (third business day), Trading Window closes March 15.

b) Disclosure Restrictions

Directors and all (not just Restricted Employees) employees are also prohibited from disclosing material, non-public information about the Company to any third party, unless the information is being disclosed to the investing public generally, for example through a press release.

ANYONE IN DOUBT ABOUT THE APPLICATION OF THIS POLICY SHOULD CONSULT WITH ARCBEST'S GENERAL COUNSEL BEFORE PROCEEDING WITH ANY TRANSACTION INVOLVING THE COMPANY'S SECURITIES OR BEFORE DISCLOSING MATERIAL, NON-PUBLIC INFORMATION TO ANY THIRD PARTY.

2. Legal Background.

Buying or selling the Company's securities while in possession of material, non-public information, or improperly disclosing such information, is commonly known as "insider trading" or "tipping," respectively, and may constitute fraud in violation of federal and state securities laws and other legal and regulatory requirements. The penalties for such violations are severe and could result in substantial liability and embarrassment to the Company, as well as criminal and civil liability for the violator, including fines of up to \$1 million and ten (10) years in prison. Accordingly, it is the policy of the Company to prohibit: (i) Directors and Restricted Employees from trading in the Company's securities while in possession of material, non-public information, and (ii) Directors and any employee from improperly disclosing material, non-public information to third parties. This Policy and the procedures detailed below are intended to educate and to help avoid even the appearance of improper conduct, in order to protect the reputation of the Company and its Directors and Restricted Employees. Some aspects of this Policy may be more restrictive than applicable law in order to establish standards of conduct that will avoid even the appearance of impropriety. Higher standards are not intended to result in civil or criminal liability that would not otherwise exist in the absence of this Policy.

3. Trading Restrictions.

Directors and Restricted Employees of the Company are prohibited from trading in the Company's securities (for their own or related accounts) while in possession of material, non-public information relating to the Company.

In order to avoid even the appearance of impropriety, Directors and Restricted Employees are prohibited from trading in the Company's securities except during the Trading Windows each year or pursuant to a valid Rule 10b5-1 plan that has been entered into in accordance with this insider trading policy. The Trading Windows (i) begin at the opening of trading on the third (3) business day after the Company publicly announces its quarterly results of operations (or full year results with respect to the fourth quarter), and (ii) end on the fifteenth day of March, June, September and December.

Either purchases or sales in ArcBest Stock in the ArcBest 401(k) and DC Retirement Plan are limited to the four Trading Windows or pursuant to a valid Rule 10b5-1 plan. This restriction also applies to a 401(k) loan request, hardship withdrawal request or other distribution from the 401(k) if such request will result in a liquidation of some or all of such participant's ArcBest Stock held pursuant to the ArcBest 401(k) and DC Retirement Plan.

Even within these Trading Windows, it is a violation of the law and Company policy for a Director or Restricted Employee to trade in ArcBest's securities if they know material, non-public information. You are not required to check with ArcBest's General Counsel before making a trade during a Trading Window; however, you may want to check with him to minimize any later question that you knew material, non-public information at the time you traded or if you have a question whether some information you have would be considered material, non-public information.

Notwithstanding the foregoing, this policy's trading restrictions generally do not apply to the exercise of an employee or director stock option. The trading restrictions do apply, however, to any sale of stock acquired upon the exercise of an option, including as part of a broker-assisted cashless exercise of an option (as this entails selling a portion of the underlying stock) or any other market sale for the purpose of generating the cash needed to pay the exercise price of an option.

At least 15 days prior to entering into a Rule 10b5-1 plan, a Director or Restricted Employee shall provide a copy of the proposed plan to the Company's general counsel for review and approval. In addition to complying with the requirements of Rule 10b5-1(c), such 10b5-1 plan may only be adopted during a Trading Window and shall include a waiting period of between 30 and 120 days, as recommended by the Company's general counsel given the facts and circumstances surrounding the adoption of the plan, following adoption of plan during which no trades can occur. This waiting period helps avoid the appearance that the plan was designed as a cover for trades based on material, non-public information. The Company shall not be bound by or obligated to take or refrain from taking any actions or required to give any notice under a Rule 10b5-1 plan unless the Company agrees to such in writing. The Company is not required to approve any Rule 10b5-1 plan presented to it and the Company's approval of a Rule 10b5-1 plan shall not be deemed to be evidence of the Company's agreement that such plan satisfies the requirements of Section 10b5-1(c) of the Securities Exchange Act of 1934, as amended. Directors and Restricted Employees are strongly encouraged to obtain the advice of their own legal, accounting and financial advisors prior to entering into a Rule 10b5-1 plan.

4. Disclosure Restrictions.

Directors and all employees are prohibited from disclosing material, non-public information about the Company to any third party, unless the information is being disclosed to the investing public generally, for example through a press release. Similarly, Directors and all employees who are in possession of material, non-public information about the Company are prohibited from recommending that any third party (including family members and friends) buy, sell or hold any securities of the Company. Disclosure of material, non-public information to a third party ("tipping") may result in criminal or civil liability to the person disclosing such information if the third party trades on the basis of that information or uses that information to tip another person who trades on the basis of that information.

5. Anti-hedging Policy for Employees and Non-employee Directors.

The Company considers it inappropriate for any Director, officer or other employee of ArcBest or any of its subsidiaries who is a party to an insider trading agreement with the Company (including any member of such person's family sharing the same household) to purchase any financial instrument that is designed to hedge or offset any decrease in the market value of the Company's stock. This policy prohibits the purchase or sale of puts, calls, options, or other derivative securities based on the Company's securities. This prohibition also includes monetization transactions, such as forward sale contracts, in which the stockholder continues to own the underlying security without all the risks or rewards of ownership, short-selling Company securities or "selling against the box" (failing to deliver sold securities) as well as any other hedging transaction involving the Company's securities. This policy does not include ArcBest stock options exercised in accordance with the terms of the Company's equity plans.

6. Special Prohibitions on Directors and Executive Officers.

In addition to the violation of Company policy, Directors and executive officers (“Executive Officers”) of the Company are prohibited by law from engaging in any “short sale” of the Company’s securities (including short sales “against the box”). “Executive Officers” are ArcBest’s officers and other individuals who are required to file Forms 3, 4 and 5, disclosing any transactions in the Company’s stock with the Securities and Exchange Commission. “Short Sales” are sales of a security by an investor who does not own the security at the time of sale, but who borrows the securities, typically from a broker, with the promise to later deliver purchased securities in replacement of the borrowed ones.

Directors and Executive Officers are also prohibited by law from receiving “short-swing” profits with respect to the Company’s equity securities. Short-swing profits generally include any profit that results from the purchase and subsequent sale or the sale and subsequent purchase of the Company’s equity securities (or any security convertible into an equity security) occurring within a six (6) month period. Generally, purchases of stock directly from the Company pursuant to a stock option plan are not “purchases” for purposes of the “short-swing” rules. The rules relating to short-swing profits are complicated, and Directors and Executive Officers should consult with General Counsel concerning these rules prior to effecting any purchase or sale of the Company’s securities.

Directors and Executive Officers may not purchase Company securities on margin, borrow against any account in which Company securities are held, or pledge Company securities as collateral for a loan.

7. Consequences of a Violation of the Policy.

Directors and Restricted Employees of the Company should be aware that any securities transaction effected on the basis of material, non-public information may result in criminal liability or civil liability to third parties. Directors and all employees should also be aware that the disclosure of material, non-public information, even when there is no trading transaction by the person making the disclosure, still may result in criminal or civil liability for “tipping.”

All Directors and Restricted Employees must strictly observe the provisions of this Policy. Any questions or concerns regarding this Policy should be referred promptly to the General Counsel. Any person who acquires information that gives them reason to believe that any other person is engaged in conduct prohibited by this Policy should promptly report such information to the General Counsel.

Because of the seriousness of the consequences that could result from violations of this Policy, violations of this Policy may be grounds for disciplinary action, including termination or suspension of employment.

8. Definitions.

In general, information is “**material**” if it could reasonably be expected to affect the price of the Company’s securities or if a reasonable investor would consider such information important in deciding whether to purchase, hold or sell such securities. Some common examples of material information include, but are not limited to, the following: projections of future revenues or earnings; earnings announcements; introductions of new products or services; the

gain or loss of a substantial customer; a proposed merger, acquisition or joint venture; sales of significant assets; proposed financing transactions; changes in Executive Officers; impending financial or operational problems or the resolution of such problems; or major lawsuits or claims. The foregoing list is provided only for illustrative purposes. Whether information qualifies as “material” depends on the facts of the situation. Consult the General Counsel if there is any question as to the materiality of any information.

Information is “**non-public**” when it is not available to investors generally. Information is generally considered to be “non-public” until (i) it has been effectively disclosed in a manner that ensures its availability to the investing public, and (ii) the market has had time to absorb the previously non-public information (generally at least two (2) business days after the information is made public by the Company). Information learned from a source outside of the Company may still constitute non-public information if it has not been publicly disclosed. In addition, even if there are widespread and correct rumors about the Company (whether such rumors are discussed inside or outside of the Company), the information that is the subject of the rumors may still be non-public if that information has not been publicly disclosed by the Company.

The term “**related account**” means any account maintained by (i) family members of Directors or Restricted Employees and others living in the same household, and (ii) accounts that are controlled or subject to the influence of the Director or Restricted Employee, his family members, or others in his household; or accounts for which such persons act as a fiduciary, such as a trustee.

The term “**security**” is defined broadly under the applicable securities laws to include not only stocks, but also any bond, note, convertible note, option, warrant, or other right to purchase or sell any such security, or any other instrument commonly known as a security.

The term “**subsidiary**” is defined to mean any corporation of which ArcBest Corporation owns fifty percent (50%) or more of its voting stock.

ACKNOWLEDGMENT

The undersigned hereby acknowledges and confirms that he or she has received, reviewed, understands and will comply with the ArcBest Corporation Insider Trading Policy (“the Policy”). The undersigned understands that he or she is bound by the Policy at all times beginning on the date on which they initially sign the Acknowledgement of the Policy and continuing until they are removed from the Insider Trading List by an administrator.

Name

Signature

Company, Department

Date