



**Jack Cooper Investments, Inc.
Diversity, Equity, and Inclusion Policy**

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1.0 Purpose

This Diversity, Equity, and Inclusion Policy (this “**Policy**”) covers a wide range of social and business practices. It does not cover every issue that may arise, but it sets out basic principles to guide all directors, officers, and employees of Jack Cooper Investments, Inc. and its wholly owned or controlled subsidiaries (collectively, the “**Company**” or “**Jack Cooper**”). For purposes of this Code, the Company’s directors, officers, and employees are referred to herein as “**Covered Persons**”. All Covered Persons must conduct themselves accordingly and seek to avoid violations of the contents contained herein. This Policy should also be provided to and followed by the Company’s agents and representatives.

Jack Cooper is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. Moreover, the Company strives to create an environment where every team member feels welcome and valued.

We believe that our people are our most valuable asset. We recognize the value individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, capabilities, and talent bring to our culture, reputation, and achievements. Moreover, we understand that these differences are what enable us to succeed.

The Company embraces and encourages differences in age, color, ability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

2.0 Related Policies

The basic principles discussed in this Policy are subject to any other Company policies covering the same issues. The following policies may be referenced throughout this Policy and should be consulted for additional guidelines:

- *Anti-Corruption and Foreign Corrupt Practices Compliance Policy*
- *Corporate Disclosure Policy addressing Regulation FD*
- *Corporate Governance Guidelines*
- *Employee Handbook*
- *Insider Trading Policy*
- *Internal Controls Policy*
- *Internal Investigations Policy*
- *Online Conduct Policy*
- *Record Retention Policy*
- *Related Party Transactions Policy*
- *Environmental and Sustainability Policy*
- *Health and Safety Policy*
- *Human Rights Policy*
- *IT Information Security Policy*



If a law conflicts with any portion of this Policy, Covered Persons must comply with the law. Alternatively, if a local custom or policy conflicts with this Policy, Covered Persons must comply with this Policy. If Covered Persons have any questions about these conflicts, Covered Persons should ask their supervisor how to handle the situation. Directors and officers of the Company should discuss any questions with the Company's General Counsel. Covered Persons are responsible for understanding the legal and policy requirements that apply to their jobs and for reporting any suspected violations of law, this Code, or any Company policy.

Those who violate the standards in this Policy will be subject to disciplinary action, including possible termination. Furthermore, violations of this Policy may also be violations of law and may result in civil or criminal penalties for Covered Persons, their supervisors, if any, and/or the Company.

3.0 Scope/Responsibility

All Covered Persons are required to follow the practices set forth in this Policy. All Covered Persons must acknowledge this Policy upon onboarding or hire and re-acknowledge annually thereafter.

The Company's Executive Management Team has developed a Diversity, Equity, and Inclusion Commission (the "**Commission**") that is responsible for establishing the Company's policy, ensuring adherence and communication, and reporting performance. Moreover, the Commission has the ultimate authority to assess the applicability of this Policy to each situation, and its determination as to corrective measures and disciplinary action in the enforcement of this Policy. The Commission in conjunction with Company leadership involvement is committed to:

- Fostering a diverse and inclusive culture throughout all operations;
- Providing education and training to drive learning, adoption, and advocacy;
- Illustrating fairness and respect of all members of Jack Cooper;
- Ensuring parity and equality in roles, pay, and promotions;
- Building higher levels of women drivers and leaders;
- Using our platform to advocate for diversity in our communities and the world;
- Leveraging our woman-owned business status to encourage strategic partnerships and relationships; and
- Providing safe and healthy environment for our employees.

All Covered Persons have a responsibility to always treat others with dignity and respect. All Covered Persons are expected to exhibit conduct that reflects inclusion during work, at work functions, on or off the work site, and at all other Company-sponsored and participative events. Any Covered Person found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.



All Covered Persons are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Covered Persons who believe they have been subjected to any kind of discrimination that conflicts with this Policy or the Equal Employment Opportunity Policy should seek assistance from a supervisor, an Human Resources representative, or member of the Diversity, Equity, and Inclusion Commission.

4.0 Diversity, Equity, and Inclusion Practices

This section describes the business and social practices covered by this Policy.

Jack Cooper believes that diversity, equity, and inclusion are key components in achieving our mission and providing premier customer value. We aim to cultivate belonging and empowerment. We encourage and support gender parity and women leaders. We partner with diverse suppliers and customers. We value and defend diversity in our communities.

In addition to our focus on diversity and inclusion, Jack Cooper strives to expand its commitment to being a good neighbor in the communities where we live, work, and operate. Our commitment is shown by not only being environmentally responsible but also engaging in social stewardship through volunteerism and charitable events. At Jack Cooper, we believe in community ownership, driving change, collaboration, and connection through our work and our people.

Our approach to managing all aspects of social responsibility is driven by our core values and dedication from executive leadership. The following practices are the core of our plan to become a better social enterprise:

- 1. Policy.** We recognize the strengths of diverse and inclusive teams. Employees are provided transparent communication of Company standards, practices, and expectations regarding our dedication to social leadership.
- 2. Training.** We place serious emphasis on diversity, equity, and inclusion in our business. Training programs are offered to all levels of staff in the organization, providing an effective framework for learning and driving commitment from our teams.
- 3. Targeted Recruiting.** Every recruiting effort is supported with the intention to find the best talent. We actively find ways to make our organization more appealing to diverse, multi-generational talent pools and expand our recruitment programs to better engage underrepresented cultural groups.
- 4. Diverse Leadership.** Leadership programs drive internal growth and employee retention. Through mentorship and sponsorship, we foster diversity in our leaders and create opportunities to engage more women and minorities in executive and management positions.



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5. **Communication & Relationship.** We believe in family first at Jack Cooper and part of that belief is ensuring our people feel heard, engaged, and supported. Cadenced communication on diversity efforts and networking events not only build relationships but encourage open dialogue and learning.
 6. **Community Outreach.** Our business does not exist without the communities around us. Through volunteering, charity, and other programs, we are dedicated to giving back time and resources to drive sustained and impactful socio-economic change.
 7. **Assessment & Feedback.** We are an organization focused on execution and results. We do what we say we will do. We have processes in place that will help us monitor and track progress of our social efforts and welcome our employees to give feedback on how we're doing.
 8. **Health & Safety.** Our employees are at the core of our success. Their safety, health, and well-being are fundamental to our business performance. We maintain rigorous safety protocols, provide comprehensive quality health insurance, encourage healthy habits, and provide support in critical situations.

Further, our diversity initiatives are applicable – but not limited – to our practices and policies on recruitment, compensation and benefits, professional development, training, promotions, social and recreational programs, and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees;
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives;
- Work/life balance through flexible work schedules to accommodate employees' varying needs; and
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

For more information about diversity and inclusion, visit <https://www.jackcoopernews.com/jcdi>