



Jack Cooper Investments, Inc. Human Rights Policy

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1.0 Purpose

All directors, officers, and employees of Jack Cooper Investments, Inc. and its wholly owned or controlled subsidiaries (collectively, the “**Company**”) are committed to driving human progress with Company culture and practices that strive to improve the health and well-being of the communities that we operate and respect the rights of the people who live there. This Human Rights Policy (this “**Policy**”) covers a range of human rights and working condition topics, including modern slavery, child labor, and young workers. While this Policy does not cover every human rights issue that may arise, it sets out principles to guide the Company’s directors, officers, and employees (collectively, “**Covered Persons**”).

The Company is committed to respecting the United Nations Guiding Principles on Business and Human Rights. All Covered Persons must conduct themselves accordingly and avoid practices that run afoul of this Policy. Additionally, the Company demands that the employees of its suppliers, vender, contractors, and sub-contractors be afforded basic human rights, including those enumerating in the Universal Declaration of Human Rights. The Company also expects its suppliers, vender, contractors, sub-contractors, and other business partners to be fair, humane, and lawful employers.

2.0 Scope

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

The Company’s executive management team is responsible for establishing this Policy, ensuring it is followed, and reviewing compliance annually. The Company’s executive management team



is also responsible for ensuring all suppliers, vender, contractors, and sub-contractors comply with the practices set forth herein.

3.0 Compliance with Laws, Rules, and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which this Company's ethical standards are built. All Covered Persons must respect and obey the laws, rules, and regulations of the cities, states, and countries in which we operate. The Company also expects Covered Persons to follow all applicable civil and human rights laws, rules, and regulations.

Although Covered Persons are not expected to know the details of each of these laws, rules, and regulations, it is important to know enough to determine when to seek advice from supervisors, managers, or the Company's General Counsel. If Covered Persons are uncertain about their responsibility or obligation, they should check with their supervisor, manager, or General Counsel.

4.0 Guidelines

The Company follows all internal policies and complies with or exceed all applicable laws, rules, and regulations. The Company expects its suppliers, vender, contractors, sub-contractors, and other business partners to adopt and enforce similar human rights policies and extend them to their own supply chain.

4.1 Human Rights

The Company respects human rights in all of its activities and seeks to address adverse impacts the Company has caused on a timely basis. Aligned with the UN Guiding Principles on Business and Human Rights, the Company is committed to respecting these widely accepted international human rights frameworks and charters, including the International Bill of Human Rights (The United Nations Universal Declaration of Human Rights and its two Covenants) (1948).

Further, the Company strives to uphold, promote, and support human rights by following this Policy to identify and monitor risks, remediate any non-compliance, and transparently report our progress. Specifically, this Company:

- Treats its employees and workforce fairly, humanely, and with respect and dignity;
- Prohibits the use of child labor in any form. The Company does not employ anyone below the age of 15, *unless* as part of a government-authorized job training or apprenticeship program that clearly benefits the participants;
- Prohibits the use of forced or compulsory labor in any form and does not tolerate any forms of abusive disciplinary practices;
- Prohibits the use or support of human trafficking;



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- Follows ethical recruiting practices, including but not limited to prohibiting the use of misleading or fraudulent practices while offering employment, the use of recruitment fees paid by employees, and the confiscating, destroying, concealing, and/or denying of access to employee identity documents;
 - Recognizes and respect Company employees' rights to freedom of association and collective bargaining;
 - Complies with applicable laws regulating hours of work and provide fair and competitive compensation and benefits that meet or exceed legal requirements; and
 - Commits to not tolerating harassment or discrimination of any form, supporting diversity and women's rights, providing a healthy and safe working environment, protecting consumer and employee data privacy, and prohibiting bribery, even in countries where it may be tolerated or condoned.

These policies are also addressed in the Company's Code of Business Conduct and Ethics Policy.

4.2 Modern Slavery and Human Trafficking

The Company maintains a zero-tolerance approach to modern slavery. Accordingly, the Company is committed to acting ethically and with integrity in its business operations and implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Company's business operations or those of its suppliers, vender, contractors, sub-contractors, or other business partners. If modern slavery practices are found in the Company's supplier, vender, contractors, sub-contractor, or other business partner's supply chain, the Company will immediately terminate its business relationship and notify the relevant authorities.