



**Jack Cooper Investments, Inc.
Environmental and Sustainability Policy**

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1.0 Purpose

As an environmentally-conscious corporate citizen, Jack Cooper Investments, Inc. and its wholly owned or controlled subsidiaries (collectively, the “**Company**”) is committed to continued environmental leadership in its business services and activities. While each of the Company’s subsidiaries has its own operating plan, taking into consideration the business’s unique function, the regulatory environment, and environmental concerns, a common environmental policy facilitates effective environmental stewardship and supports the Company’s mission of delivering for people and the planet. This Environmental and Sustainability Policy (this “**Policy**”) addresses a wide range of sustainable objectives commitments that are intended to protect and improve the environment, conserve natural resources, address climate change, promote our business-partner’s environmental objectives, and be a responsible community leader.

This Policy is a foundational component of the Company’s approach to managing Environmental Health and Safety, included in its core values. This Policy also demonstrates the Company’s commitment to “Project Zero,” in which the Company strives to achieve the goal of “Zero Harm” across its entire business operation. At the Company, “Zero Harm” means the following:

- Zero injuries;
- Zero environmental incidents; and
- Zero damage incidents.

The basic commitments discussed in this Policy are subject to any other Company policies covering the same issues.

2.0 Scope/Responsibility

All of the Company’s directors, officers, and employees (“**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 the overall Environmental Policy for the Company, ensuring it is followed; and for reviewing the performance of each business unit. The Company’s executive management team shall also define the Company’s environmental policy and ensure that, within the defined scope of its environmental management system, it:

- is appropriate to the nature, scale and environmental impacts of the Company’s activities, products, and services;
- includes a commitment to continuous improvement and prevention of pollution;
- includes a commitment to comply with applicable legal requirements and with other requirements to which the Company subscribes which relate to its environmental aspects;
- provides the framework for setting and reviewing environmental objectives and targets;
- is documented, implemented, and maintained;



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- is communicated to all persons working for or on behalf of the Company; and
 - is available to the public.

If a situation arises where a Covered Person is in doubt as to what to do, they should seek advice from their supervisor, manager, General Counsel, or the Vice President of Quality Assurance & Safety.

The Company's procurement department is responsible for ensuring all vendors and suppliers comply with the practices set forth in this Policy. All terminals and all business units are responsible for executing objectives and ensuring all operational processes/procedures are followed by our employees and all contractors. With these policies in place, we believe that we can achieve a healthy and safe environment.

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 environmental laws 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 General Counsel. If Covered Persons are uncertain about their responsibility or obligation, they should check with their supervisor, manager, General Counsel, or the Vice President of Quality Assurance & Safety for guidance.

4.0 Guidelines

In pursuing a sustainable future, the Company shall comply with the following guidelines and work to achieve the objectives set forth in this Policy.

4.1 Environmental and Sustainability Commitments

4.1.1 Environmental Regulations, Standards, and Policies

The Company intends to fully comply with applicable environmental laws, regulations, and other legal obligations. Whenever possible, the Company intends to achieve even higher standards and it is committed to working with government entities to improve environmental policies and practices. In furtherance of these objectives, the Company intends to do the following:

- Periodically review the Company's compliance with applicable environmental laws and regulations;



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- Ensure all Covered Persons are knowledgeable of, understand, and comply with all applicable environmental laws and regulations;
 - Promptly report all non-compliance issues in accordance with applicable governmental reporting requirements, evaluating causes of noncompliance, and implementing corrective actions;
 - Promptly correct any practice or condition not in compliance with this Policy; and
 - Promote cooperation and understanding with government agencies to develop economically feasible and environmentally-sound habitat protection objectives.

4.1.2 Environmental Management System

The Company intends to continuously improve the environmental aspects arising from Company activities and guarantee compliance with applicable laws and regulations. Accordingly, the Company is committed to setting goals for reducing its impact on the environment, measuring its progress annually, revising this Policy, and publishing its environmental policies and practices.

4.1.3 Greenhouse Gas Emissions, Renewable Energy, and Climate Solutions

Climate change is responsible for rising sea levels and worsened or prolonged severe weather events that disrupts the usual balance of nature. The Company is committed to taking directed action to address the negative effects of global warming. Specifically, the Company intends to publicly disclose its greenhouse gas emissions. Additionally, the Company will transition its Class 8 vehicles to zero greenhouse gas emissions and the Company has set an ambitious goal of reaching carbon neutrality by 2030 – far ahead of other industry members.

The Company also intends to exert its sphere of influence to contribute to solutions that lead to a stable climate, including:

- Responsible use of energy throughout Company operations, including conserving energy, improving energy efficiency, and giving preference to renewable over non-renewable energy when available and fiscally feasible.

4.1.4 Environmental Stewardship

The Company is dedicated to educating and engaging its suppliers, customers, employees, and the public on topics relevant to sustainable transportation and logistics practices, protecting environmentally sensitive lands, and encouraging its employees to include land restoration and conservation in their community service. The Company also intends to be an environmentally conscious and responsible member of the various communities in which it operates and is



committed to addressing the factors that endanger health, safety, and the environment.

4.1.5 Natural Resource Conservation

The Company is committed to reducing water and energy consumption throughout its operations to lower costs and reduce environmental impacts.

4.1.6 Improving Technologies and Waste Reduction

The Company intends to pursue development of technology solutions, including load optimization and paperless technologies that reduce not only the Company's carbon footprint but also greenhouse gas emissions and other environmental pollutants in the entire transportation and logistics industry. Specifically, the Company is committed to:

- Maintaining and improving operations and internal technology processes to minimize waste and other pollutants, minimize health and safety risks, and dispose of waste safely and responsibly;
- Participating in efforts to improve environmental protection and understanding by sharing appropriate pollution prevention technology, knowledge, and methods with other entities;
- Limiting the use of hazardous materials and other pollutants by adopting pollution prevention practices that minimize the risks posed to environmental, health, and safety; and
- Managing the life cycle of its products, solutions, and services in an environmentally responsible manner by conserving Company resources, eliminating waste, and recycling or reusing operational byproducts.

4.1.7 Other Operations

Lastly, as discussed below, the Company is committed to continued responsible sourcing. It also intends to continue working with its suppliers to develop sustainable solutions and prioritization of suppliers that are committed to equity, diversity, and inclusion.

4.2 Sustainable Procurement Policy

In accordance with Company standards, the Company recognizes its responsibility to minimize negative impacts on human health and the environment while supporting a diverse, equitable, and vibrant business. The Company recognizes that the types of products and services it buys have inherent social, human health, environmental, and economic impacts. Thus, the Company endeavors to make procurement decisions that embody the Company's commitment to sustainability. This Sustainable Procurement



Policy (this “**Sustainable Procurement Policy**”) applies to all Company contractors, sub-contractors, vendors, suppliers, owner operators and consultants.

Consistent with the Company’s goal of “Zero Harm” and the economics of effectively managing costs for solid waste disposal, the Company shall prioritize the adoption and use of recycled and/or recyclable supplies and materials. Moreover, the Company will give preference to environmentally friendly products whose quality, functionality, and cost are equal or superior to traditional products. The Company will also procure materials, products, and services in a manner that integrates environmental stewardship, fiscal responsibility, and social equity.

This Sustainable Procurement Policy is intended to focus on the following areas:

- Identifying those sustainability factors that shall be incorporated into procurement decisions;
- Providing implementation guidance;
- Empowering employees to be innovative and demonstrate leadership by incorporating sustainability factors into procurement decision;
- Complementing Company sustainability goals, commitments, and policies;
- Ensuring the health and safety of Covered Persons and the general public;
- Supporting the local economy by purchasing goods and services from local vendors;
- Procuring goods and services that are environmentally friendly without compromising quality, functionality, or cost; and
- Complying with all local, state, and federal laws that govern the Company’s procurement activity.

4.2.1 Sustainability Factors

The Company will incorporate the following factors when writing specifications for or procuring materials, products, or services. Although every factor will not be considered for every purchase, it is the intent of this Policy that the Company make a dedicated effort to integrate and consider these factors as much as possible.

Environmental factors to be considered include but are not limited to the following:

- Waste generation;
- Greenhouse gas and other pollution emission;
- Energy consumption;
- Depletion of natural resources;
- Impact on biodiversity; and
- Toxicity, especially the use toxic/harmful chemicals.

Social equity factors to be considered include but are not limited to the following:



- Human health;
- Vender employee and sub-contractor safety and occupational health;
- Protection and preservation of basic human rights;
- Compliance with all applicable laws and basic business ethics; and
- Use of local businesses.

Fiscal factors to be considered include but are not limited to the following:

- Consumption reduction;
- Product performance and quality;
- Lifecycle cost assessment;
- Leveraging buying power; and
- Long-term financial and market changes.

4.2.2 Best Practices

The use of best practices in sustainable procurement are those that utilize leading edge sustainability factors, standards, and procedures in an efficient and effective way that is both successful and replicable. The Company is shall adhere to best practices in sustainable procurement as they evolve.

4.2.3 Toxins in Products and Services

The Company will utilize the Precautionary Principle approach as a guide when evaluating the comparative toxicity of products and services.

4.2.4 Data Collection and Performance Reporting

For purposes of setting goals and evaluating the performance of this Sustainable Procurement Policy, vendors may be asked to report the environmental attributes of their product and services. Thus, Company procurement personnel shall be responsible for the following:

- Collaborating with vendors to design and implement a data collection system for tracking the environmental attributes of vendor products and services;
- Compiling records for the purpose of producing an annual summary of the Company's environmentally responsible purchasing operations and for evaluating the effectiveness of these actions in reducing the environmental impacts of Company procurement;
- Identifying opportunities to educate end users about the impacts of their product choices; and
- Collecting and reviewing the sustainability reports from the Company's top 10 suppliers based on annual purchases.



4.2.5 Education and Training

The Company shall commit to providing the appropriate dedicated staff levels and related funding to support the implementation and coordination of this Sustainable Procurement Policy. This includes activities such as, but not limited to, employee training and resources, professional services, product and/or service pilot tests, and educational materials. Accordingly, the Company's procurement personnel shall be responsible for the following:

- Building awareness of the Sustainable Procurement Policy and sustainable procurement standards through information distribution and incorporation into routine employee trainings;
- Encouraging employee attendance at internal and external trainings related to sustainability;
- Encouraging the use of environmentally sustainable products and services through information distribution, development of internal procedures, pilot testing, and leadership;
- Developing employee sustainable procurement resources such as, but not limited to, standards, specifications, tools, and best practices;
- Communicating to existing and potential contractors and the public about the Sustainable Procurement Policy; and
- Gathering information for the purposes of tracking, reporting and evaluating the Company's sustainable procurement activities.

4.2.6 Social Equity

The Company demands that all employees of Company vender, contractors and sub-contractors be afforded basic human rights, including those enumerating in the Universal Declaration of Human Rights. This Sustainable Procurement Policy requires the following:

- All Company vendors, contractors, and sub-contractors shall have ethical business policies and practices in the areas of corporate governance, insider trading, bribery, discrimination, corporate social responsibility, and fiduciary responsibilities;
- All Company vendors, contractors, and sub-contractors shall ensure that all applicable human rights and those proclaimed by the United Nations are followed; and
- All Company vendors, contractors, and sub-contractors must have an Occupational Safety & Health Processes in place, including a clean and sanitary workplace free from hazards.



4.2.7 Source Reduction

Reducing unnecessary waste at the source allows the Company to both mitigate the inefficient use of natural resources and benefit economically from decreased handling and disposal costs. Thus, the Company's procurement activity includes the following:

- Utilizing institutional practices that reduce waste, resulting in the purchase of fewer products whenever practicable and cost-effective but without sacrificing quality or workplace safety;
- Purchasing remanufactured products as often as possible, such as laser toner cartridges, tires, furniture, equipment and equipment parts whenever practicable but without reducing quality, safety, or functionality;
- Considering short and long-term costs in comparing product alternatives and the evaluation of total costs expected during the time a product is owned, including but not limited to acquisition, extended warranties, operation, supplies, maintenance, disposal costs, and expected lifetime compared to alternatives;
- Purchasing products that are durable, reusable, or refillable;
- Requesting that vendors eliminate packaging or use the minimum amount necessary for product protection to the extent practicable;
- Requesting packaging that is reusable, recyclable, or compostable when suitable uses and programs exist;
- Reusing as many materials and items as possible; and
- Requiring that all equipment bought after the adoption of this Sustainable Procurement Policy, where practicable, be compatible with products and services that provide source reduction benefits.

4.2.8 Recycled Content Products

The Company has made investments in developing a successful recycling system and recognizes that recycled content products are essential for continuing the viability of the recycling system and the foundation of an environmentally-sound production system.

At the Company, procurement activity includes products that the United States Environmental Protection Agency (USEPA) has established minimum recycled content standard guidelines, such as printing paper, office paper, non-paper office products, and those that contain the highest post-consumer content practicable.



4.2.9 Energy and Water Savings

Recognizing that clean water is a finite resource, and the generation of electricity is a major contributor to air pollution and climate change, the Company's procurement activity includes the following:

- Energy-efficient equipment with up-to-date energy efficiency functions, including but not limited to high-efficiency heating and cooling systems;
- Efficient lighting with energy-efficient equipment; and
- Products for which the USPA Energy Star Certification is available and that meet the requirements for Energy Star Certification, where practical.

5.0 Existing Environmental Sustainability Practices and Policies

In addition to the environmental and sustainability commitments listed above, the Company is committed to being an environmentally conscious industry leader. Accordingly, the following sustainability practices are already in effect:

- **Hazardous Contamination.** The Company's leading pollution and contamination source is soil/water contamination from equipment leaking fuel, oil, and hydraulic fluid. To reduce this exposure, maintenance repair practices are in place to ensure equipment is not leaking and all harmful fluids are stored in secondary containment. Containment and clean-up supplies are available at all terminals. The Company also complies with the Comprehensive Environmental Response Compensation and Liability Act (CERLA) and the Resource Conservation and Recovery Act (RCRA) as well as state equivalents.
- **Industrial Noise.** Maintenance noise is the Company's leading producer of industrial noise. Company operations near parks, preserves, or residential building will make every effort to control maintenance noise exposure, especially during off peak times.
- **Light Pollution.** Every effort is made to minimize light pollution at Company owned properties. Night-time security lighting has been adjusted so it does not interfere with nearby residential buildings or wildlife areas.
- **Energy.** The Company currently makes every effort to use renewable energy, where available and economically feasible.
- **Greenhouse Gas Emissions.** The Company recognizes climate change as a serious environmental issue that must be addressed with intention. Accordingly, the Company has committed to transitioning its Class 8 vehicles to zero greenhouse gas emissions and have set an ambitious goal of reaching carbon neutrality by 2030. Additionally, within the Company's sphere of influence, it contributes to solutions that result in a stable climate.



- **Waste Reduction.** All possible byproducts of equipment repair and maintenance are recycled such that they are not disposed of as municipal waste. Non-industrial waste such as paper, cans, and bottles are also recycled where available.
- **Water Use.** The Company makes every feasible effort to reduce water usage and uses an offsite third-party vendor for equipment washing to minimize the amount of water consumed.
- **Habitat and Wildlife Protection.** Company employees and other onsite personnel are trained not to enter or disturb wildlife areas. They are also trained to avoid contact with wildlife that enter industrial areas. Local wildlife authorities will be notified, if needed, and all wildlife contact events are documented.
- **Resilience to Climate Change.** Flooding at the Company's various terminals is the leading risk resulting from climate change. Thus, all terminals have an existing plan to reduce business interruption from a flood event.
- **Resilience to Catastrophic Events.** Weather events, including tornados and severe storms, are the Company's leading catastrophic event risks. To mitigate such risk, the Company has enacted Storm Preparation and Recovery Plans for all operations. In the event of a business interruption (e.g., global pandemic), the Company has a written plan to continue operations.
- **Material Sourcing.** The Company practices responsible sourcing and works with its suppliers to develop sustainable solutions while also prioritizing suppliers that are committed to environmental sustainability as well as diversity and inclusion.
- **Physical Risk.** The Company has numerous comprehensive health and safety policies that ensure Covered Persons are adequately protected from risks posed by Company work.

6.0 Record Keeping

Applicable laws and regulations require specific documents and records to be maintained. Additional record keeping requirements may be specified in operating permits, licenses, consents or by other policies. Record keeping requirements may include many types of records, such as incident reports, manifests, monitoring data, and training records. All Covered Persons must fully assess their record keeping responsibilities and implement a program that ensures a level of compliance that is accurate, truthful, and complete.

7.0 Reporting

Certain laws require timely notification and/or reporting to government agencies for certain types of incidents (e.g., injuries, chemical releases, etc.). Covered Persons must understand all of their reporting obligations and ensure a process is in place to report all compliance information timely, accurately, and responsibly to corporate staffs and regulatory authorities. In addition, Covered



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Persons must provide accurate and timely environmental metrics and data through sound reporting practices. This data is the basis for internal and external reporting.