

Auto Safety Program

Owner	Risk Management
Effective Date	July 1, 2020
Procedure Number	GP-C-16
Revision Number	2

1. Purpose

Many employees operate Company owned, leased, rental or personal vehicles as part of their jobs. Employees are expected to operate vehicles safely and lawfully to prevent accidents, injuries and property loss. It is the policy of GP Strategies Corporation to provide, maintain and promote a safe working environment to protect our employees and members of the communities in which we conduct business from injury and property loss. The Company is committed to promoting a high level of safety awareness and responsible driving behavior among its employees. Our efforts and the commitment of our employees to safe driving will prevent vehicle accidents and reduce personal injury and property loss claims. This program requires the full cooperation of each driver to operate their vehicle safely and to adhere to the responsibilities outlined in the Auto Safety Program. Elements of this program include:

- Assigning responsibilities at all levels of employment.
- Vehicle use and insurance requirements.
- Employee driver's license checks.
- Motor Vehicle Record reviews.
- Accident reporting and investigation.
- Accident reviews.
- Safety regulations.

Risk Management is responsible for the successful implementation and on-going execution of this program. Supervisors and employees are responsible for meeting and maintaining the standards set forth in this program.

2. Scope

This policy applies to all employees who operate vehicles in connection with their employment by the Company. The spirit of this policy will also be incorporated into contracts to encourage safe and lawful driving by persons who operate vehicles as a contractors or employees of contractors of the Company. Under the Auto Safety Program, "vehicles" means gasoline-powered, electric and other vehicles for which a driver's license is required to operate on a public or private road.

3. Responsibilities

3.1 Company President

The President is responsible for oversight of the Auto Safety Program.

Auto Safety Program

3.2 Management

All levels of management will assist with implementation, acceptance and ensuring compliance with the Auto Safety Program.

3.3 Risk Management will:

- 3.3.1 Provide periodic reports and recommendations to the President and other Company executives regarding losses, claims, patterns and effectiveness of the Auto Safety Program.
- 3.3.2 Review motor vehicle accident reports quarterly.
- 3.3.3 Revise the Auto Safety Program and communicate changes to managers and employees as necessary.
- 3.3.4 Maintain appropriate records.

3.4 Drivers shall:

- 3.4.1 Always operate a motor vehicle in a safe and lawful manner.
- 3.4.2 Maintain a valid driver's license and at least the minimum insurance required to operate a motor vehicles in the jurisdiction in which the employee resides. Employees may be required to produce evidence of automobile insurance on demand.
- 3.4.3 Report to their immediate supervisor and/or Risk Management all Company owned or leased motor vehicles that are in an unsafe condition. Employees will avoid operating unsafe vehicles.
- 3.4.4 Obtain the necessary training and possess the necessary license for the vehicle being operated.

4. Vehicle Use

4.1 Company Owned or Leased Vehicles, and Client-Loaned Vehicles

Only employees authorized by their supervisors will be permitted to operate a Company owned or leased vehicle, or a client-loaned vehicle.

4.2 Personal Vehicles used on Company Business

Employees who drive their personal vehicles on Company business are subject to the requirements of this program and shall:

- 4.2.1 Maintain auto liability insurance in accordance with the statutory requirements of the jurisdiction in which the employee resides, or the statutory limits of the State of Maryland, if the State in which the employee resides does not have statutory minimum requirements for auto liability insurance. However, since the employee's

insurance policy will be responsible for accidents involving employee personal vehicles, it is strongly recommended that each employee driving a motor vehicle maintain insurance coverage with minimum limits of \$100,000/\$300,000 for bodily injury and \$50,000 for property damage with a combined single limit of \$300,000 and suggested that each employee notify their auto insurance carrier if his/her vehicle is being used for business use.

- 4.2.2 Maintain current State vehicle inspections, registrations and license renewal plates as required by law.
- 4.2.3 Maintain their personal vehicle in a safe operating condition at all times, including when driven for Company business.
- 4.2.4 Maintain a current and valid driver's license.
- 4.2.5 Maintain a motor vehicle record (MVR) acceptable to the Company.

4.3 Rental Vehicles

- 4.3.1 GP Strategies employees will use GP Travel or Company-designated online booking tool (e.g., Concur) to arrange for rental vehicles through rental car agencies with which the Company has a corporate agreement.
- 4.3.2 For rentals within the continental United States, the Collision Damage Waiver (CDW) / Loss Damage Waiver (LDW) is covered under the Company's Corporate Rental Car agreement. Accordingly, employees must go through GP Travel or Company-designated online booking tool (e.g., Concur) when renting vehicles. Failure to follow this policy will result in additional charges to the applicable business unit should an accident occur.
- 4.3.3 For rentals outside of the continental United States, employees should accept the Collision Damage Waiver (CDW). Employees should decline the Personal Accident Insurance (PAI), as employees traveling abroad on Company business are covered under the corporate insurance program.

4.4 Unauthorized Use of Vehicles

Drivers assigned a Company-owned or leased vehicle, or employees authorized by their supervisor to drive a vehicle loaned to or rented on behalf of the Company, shall not allow an unauthorized individual (e.g., a spouse, friend or child) to operate such vehicle. Disciplinary action may be taken against the responsible employee, who will also be required to make restitution to the Company for any and all damages.

5. Drive Selection

5.0 Driver's Licenses

Risk Management will review the Motor Vehicle Record of each new employee to ensure that the employee has a valid driver's license upon hire and an acceptable Motor Vehicle Record.

5.1 Driver Performance

A. Risk Management will conduct a formal review of an employee's Motor Vehicle Record:

Annually: Employees assigned Company-owned or leased vehicles.

Annually: Employees expected to travel more than 50% of the time and who rent vehicles or drive their personal vehicles.

Annually: Employees with known driving violations within the preceding three years.

Annually: Employees with claims or involved in accidents within the past three years.

Semi-annually: Employees with known driving violations within the preceding 12 months.

Quarterly: Employees assigned Client-loaned vehicles.

Randomly: Employees traveling less than 50% of the time who rent vehicles or drive their personal vehicles.

Following any "major violation" or other occurrence giving the Company reason to question any employee's driving safety.

Following any employee change of residence if a change in driver's license would be expected.

B. The Company may suspend, restrict or terminate the driving privilege of any employee whose Motor Vehicle Record shows:

- Any *major violation* in the preceding 3 years
- Any 3 *minor violations* in the preceding 3 years
- Any *major* or 2 *minor violations* in the preceding 12 months
- Any *major* or *minor violations* if driver is less than age 21

States may differ in what constitute major and minor driving violations, but for purposes of the Auto Safety Program *major violations* include:

1. Operating a vehicle while under the influence of alcohol or narcotics (i.e., DUI or DWI).
2. Driving without a license, or with an invalid, revoked or suspended license.
3. Hit and Run; leaving the scene of an accident.
4. Reckless and/or negligent driving; causing a preventable accident.
5. Using a motor vehicle to commit a felony.
6. Refusing to stop for, or fleeing from, a law enforcement officer.
7. Vehicular homicide or manslaughter.
8. Speeding (20 mph or more over the posted speed limit regardless of age of driver; or 1 mph or more over the posted speed limit for drivers under age 21; or 10 mph or more over the posted speed limit for drivers over age 65).
9. Negligent homicide arising out of the use of a motor vehicle.

Minor violations include:

- Any other moving violation
- Failure to wear seat belt
- Improper turns
- Disobeying traffic lights and signals
- Speeding (any speed less than enough to be *Major violation* for driver's age)

- C. The Company may immediately suspend an employee's driving privileges upon the occurrence of any accident or behavior that raises questions about the employee's commitment to safe driving or ability to operate a motor vehicle safely. The Company may consider the employee's willingness to participate in safe driving and driving improvement courses, how much time has elapsed since the employee's last violation, whether the employee was aware they were committing a violation, and other factors bearing upon the employee's driving.
- D. The suspension, restriction or termination of driving privileges, or the employee's refusal or failure to participate in driving improvement courses as required by the Company, may result in termination of employment if driving a motor vehicle on behalf of the Company is required for the employee to carry out his or her job responsibilities.

6. Accident Recordkeeping and Reporting

6.0 Reporting

The Company considers elimination of motor vehicle accidents as a major goal. To meet this objective, all accidents involving a client loaned, or a Company owned, leased or rented vehicle or employee owned vehicle while driving on Company business, will be reported to Risk Management, investigated, documented and reviewed.

6.1 Responsibility

Implementation of these procedures remains the responsibility of the driver, SBU Directors and above, and Risk Management.

6.1.1 Driver

- A. Since the driver is the first person at the accident scene, he/she will initiate the information-gathering process as quickly and thoroughly as is feasible.
- B. Employees are required to contact the Risk Management Insurance Coordinator as soon as possible following an accident, but no later than one business day after the accident occurs.

6.1.2 Risk Management

- A. Risk Management will obtain accident data from the driver through a written statement describing the details of the accident through completion of an Auto Claim Form, which may be obtained from Risk Management. It is important to determine the extent of the accident, especially if it involves injury or death to any person.

- B. Risk Management will immediately proceed with a formal investigation to determine the underlying causes of the accident. The accident information will be forwarded by Risk Management to the insurance company's claims department, along with any additional support data (e.g., witness statements, photographs, police reports, etc.).

7.0 Employee Accident Reporting Procedures

All accidents involving vehicles used in the performance of services for GP will be handled and reported as follows:

1. If possible, move the vehicle to a safe location out of the way of traffic. Call for medical attention if anyone is hurt.
2. Take photos of the accident/incident scene and all vehicles.
3. Secure the names and addresses of drivers and occupants of any vehicles involved, their driver's license numbers, insurance company names and policy numbers, as well as the names and addresses of witnesses and injured persons. **Do not discuss fault with, or sign anything for anyone except an authorized representative of the Company, a police officer, or a representative of the Company's insurance carrier.**
4. Immediately notify Risk Management at: RiskManagementRequests@gpstrategies.com. If you are driving a client vehicle in performance of a contract which has a claims reporting procedure, the employee must report the claim in accordance with the client procedure and also to GP Risk Management.
5. You will be contacted by Risk Management and advised how to arrange for repairs to the vehicle. Do not have the vehicle repaired until you receive authorization for the repairs, except that authorization from Risk Management is not needed for repairs to employee personal vehicles.

When there is theft to your vehicle (not an accident):

1. If you did "**NOT**" witness the damage to the vehicle, or if someone has broken into the vehicle and stolen any GP issued property, you must notify the local police department immediately to file a report.
2. Immediately notify Risk Management. If the damage is discovered after working hours, please notify Risk Management as early as possible on the following work day.
3. If the vehicle is damaged, you will be contacted by Risk Management to advise you how to arrange for repairs to or replacement of the vehicle. Do not have the vehicle repaired until you receive authorization from Risk Management.
4. Send the police report and a completed Auto Claim Form to Risk Management.

8.0 Driver Safety Regulations

8.1 Safety Belts

The driver and all occupants are required to wear safety belts when the vehicle is in operation or while riding in a vehicle. The driver is responsible for ensuring passengers wear their safety belts. Children under four years of age or under 40-pounds in weight must be secured in a Department Of Transportation approved child safety seat.

8.2 Impaired Driving

The driver must not operate a vehicle at any time when his/her ability to do so is impaired, affected or influenced by alcohol, illegal drugs, prescribed or over-the-counter medication, illness, fatigue or injury.

8.3 Traffic Laws

Drivers must abide by all State, Federal, and local motor vehicle regulations, laws and ordinances.

8.4 Vehicle Condition

Drivers are responsible for ensuring the vehicle is maintained in safe driving condition. Drivers of daily rentals should check for obvious defects before leaving the rental office/lot and, if necessary, request another vehicle if the first vehicle is deemed unsafe by the employee. Drivers are encouraged to rent vehicles equipped with air bags and ABS brakes, where available, and vehicles with video backup cameras.

8.5 Cellular Telephones

Cell phone use while operating a vehicle is strongly discouraged. However, if it can't be avoided and is permitted by law, cell phone use is limited to hands free operation only. The following apply:

- A. Blue tooth or other similar connection should be used to allow for hands-free operation.
- B. Phone number memory and programming capabilities are to be utilized. Any outgoing calls should be placed with voice communication through the car telephone features or the driver should wait until they reach a safe destination.
- C. Drivers must follow applicable laws at all times.
- D. Use of all cell phone features is prohibited except in hands free mode. GPS usage should be set and activated prior to beginning the trip.

8.6 Motorcycles

Employees are prohibited from using motorcycles when traveling on Company business.

8.7 General Safety Rules

While traveling on Company business or operating a client loaned, company-owned, leased, or rented vehicle, **employees shall not:**

- A. Leave valuables in the car unattended. For example, do not leave a laptop computer in the back seat.
- B. Pick up hitchhikers.
- C. Accept payment for carrying passengers or materials (other than mileage reimbursement per GP-O-06, Travel on Company Business).
- D. Use any radar detector, laser detector or similar devices to detect the presence of speed monitoring by law enforcement officials.
- E. Push or pull another vehicle or tow a trailer (unless using a properly equipped vehicle intended for that purpose).
- F. Transport flammable liquids or gases unless a Department of Transportation or Underwriters' Laboratories approved container is used, and only then in limited quantities.
- G. Use burning flares unless unavoidable. The preferred method for warning other vehicles is to use reflective triangles.
- H. Assist disabled motorists or accident victims beyond the employee's level of medical expertise. If the employee is unable to provide the proper assistance or medical care, he/she must restrict his/her assistance to calling the proper authorities. The employee's safety and well-being is to be protected at all times.
- I. Overload vehicles with either cargo or passengers. Passengers are never permitted to ride in the bed of pick-up or cargo vehicles.
- J. Operate a cargo vehicle with an unsecured load in the cargo area.
- K. Operate a vehicle that is not of the correct size and capacity for the work for which it is being used. Vehicles may only be used for the purpose for which they are designed.

8.8 Company and Personal Property

Employees are responsible for Company property such as computers, work papers and equipment under their control. The Company will not reimburse the employee for stolen personal property. Employees must report any stolen or damaged GP or Client property to Risk Management.

**GP Strategies Auto Safety Agreement
for Employees Assigned a
Client-Loaned, or a Company-Owned or Leased Vehicle**

I, the undersigned, hereby acknowledge receipt of a client-loaned, Company-owned or Company leased automobile. If a vehicle is assigned solely to me (not a pool car), I understand that this vehicle is to be regularly maintained and serviced, according to the service schedule outlined in the Owner's Manual.

I agree to operate this vehicle in a safe manner, wear my seat belt whenever the vehicle is in motion and to require other occupants to do so, too. I agree to be responsible for all moving and parking violations that occur while the vehicle is assigned to me.

I understand that this agreement applies regardless of who is operating this vehicle. I may authorize other employees to drive this vehicle only according to the following guidelines:

- Employees of the Company or its affiliates who have a valid driver's license, an acceptable driving record per GP Strategies' Auto Safety Program, and a valid business reason to use the vehicle.
- Other responsible licensed drivers in emergency situations during my incapacity.

I agree to report all accidents or incidents resulting in personal injury or damage to the vehicle or other property to Risk Management within one business day of occurrence.

I understand I am required to maintain a valid driver's license and safe driving record. Further, I grant the Company and its designees the right to investigate my motor vehicle driving record at any time during the course of my employment.

I will comply with GP Strategies' Auto Safety Program, and I acknowledge that driving on behalf of GP is a privilege that may be withdrawn at any time if I fail to maintain an acceptable driving record per the Auto Safety Program. If my job duties require that I operate a motor vehicle and my driving record is not acceptable, then my employment may be terminated.

I understand I may not modify the vehicle in any way without written permission of the Company. Trailer hitches and towing trailers are specifically prohibited unless using a properly equipped vehicle intended for that purpose. Further, I will not take this vehicle out of the United States without written permission from Risk Management.

I understand the safe operation of this vehicle is my responsibility. If this vehicle becomes unsafe, it is my responsibility to notify my supervisor immediately.

I have read and agree to comply with the provisions of this Auto Safety Agreement and the requirements of the Company's Auto Safety Program.

SIGNATURE	Date	Driver License Number
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NAME (Print)	State Issuing Driver License
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MOTOR VEHICLE RECORDS AUTHORIZATION AND AGREEMENT

I, _____, as the operator or potential operator of a motor vehicle owned, leased, rented or used by or on behalf of GP Strategies Corporation, its affiliate, and/or their respective successors and assigns (collectively, the "Company"), agree to drive carefully at all times, to not drive while under the influence of alcohol, drugs, or any substance that may impair my ability to drive safely, to comply with all applicable Company policies, to obey all traffic laws and legal speed limits, and to not text or use hand-held cellular phones while driving,

I agree to be responsible for all traffic and parking violations that occur while operating a motor vehicle owned, leased, rented or used by or on behalf of the Company.

I agree to promptly report all accidents or incidents resulting in injury or damage while operating or in the possession of a motor vehicle owned, leased, rented or used by or on behalf of the Company.

I acknowledge and agree that the Company has the continuing right and authority to check my motor vehicle records on file with any State, including the State indicated below, either directly or through the Company's insurance agent ("Agent"), the Company's insurance carrier ("Carrier") or any other party designated by the Company or the Carrier for such purpose, and each of Agent and Carrier may deliver any such records to the Company. I understand that "motor vehicle records" includes, by way of example and not limitation, my driving records and prior driving information. I acknowledge that my employment may be contingent upon maintaining a motor vehicle driving record acceptable to the Company, if driving a motor vehicle on behalf of the Company is required to carry out my job responsibilities.

Driver's License Number

State Issued

Expiration Date

Address on the License (including city, state, and zip code)

Other State and License Numbers (Active or Expired)

Other Names by Which I've Been Known (alias, maiden name, former legal name, etc.)

Employee's/Applicant's Signature

Today's Date