

EQUAL EMPLOYMENT OPPORTUNITY

Owner	Human Resources
Effective Date	9/30/2022
Procedure Number	GP-C-04
Revision Number	5

1. Purpose

This policy sets forth the Company's position with regarding to equal employment opportunity.

2. Background

It is the policy of GP Strategies to practice the equal opportunity code of federal regulations and to comply with the provisions of Executive Order 11246 and the rules, regulations, and orders of the Secretary of Labor relevant to nondiscrimination based on race, religion, sex, national origin, age, marital status, sexual orientation, or disability. Beyond the strict interpretation of legal requirements, it is imperative to the future of the Company that all employees know they will be treated fairly. The Company is committed to the goal of providing equal employment opportunity for all persons.

3. Policy

The Company shall conduct all activities so as to provide equal employment opportunity for all persons without regard to race, color, religion, sex, national origin, age, marital, domestic partner, or civil union status, sexual orientation, gender identity, genetic information, disability or status as a disabled or Vietnam era veteran. The Company prohibits its employees from taking any action which is designed to cause unlawful employment discrimination against a fellow employee or applicant for employment, including discrimination in recruiting, hiring, placement, transfer, demotion, promotion, layoff, compensation, benefits, training, termination, or use of facilities. Compliance with this policy is a performance requirement for all employees.

4. Affirmative Action

This policy includes the Company's responsibility to take affirmative action to ensure that applicants are employed and that employees are treated during employment without regard to their race, religion, sex, national origin, age, disability, genetic information, sexual orientation, gender identity, or marital, civil union, or domestic partner status. The Company shall take affirmative action in the form of specific procedures to implement this policy. The Company has prepared and put into effect an Affirmative Action Plan for each work site having 50 or more employees, and these plans are reviewed annually. Each Plan sets forth the actions being taken by Company leaders to meet their responsibilities concerning equal employment opportunity. Plans are maintained at the applicable work site and may be reviewed by affected employees during normal business hours. Copies of all

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Plans are available for inspection in Human Resources in Corporate Headquarters during regular business hours. All Company Affirmative Action Plans include proprietary information and should be treated as confidential.

5. Responsibilities

The President is responsible for implementation of this policy. The Vice President of Human Resources is designated as the Company's Equal Employment Opportunity Coordinator who maintains copies of all Company Affirmative Action Plans and provides assistance to other Company personnel to regularly pursue the objectives of the plan. All employees are expected to promote equal employment opportunity throughout the Company.

6. Reporting

Any employee who is aware of hiring or promotion activities inconsistent with EEO and Affirmative Action requirements should report those activities to the Company's Equal Employment Opportunity Coordinator. All reports of potential violations of EEO requirements will be investigated by the Equal Employment Opportunity Coordinator in consultation with the Corporate General Counsel.