

## U.S. POLITICAL ENGAGEMENT OVERVIEW

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### **POLITICAL ENGAGEMENT AND CONTRIBUTIONS**

Public policy – legislation, regulation, and administrative action – can significantly affect GM’s business goals. GM participates in the legislative, regulatory, and political processes to ensure policymakers are informed by our expertise and insights when considering policies that impact our operations. GM makes political contributions to candidates and entities that support our industry, reflect our values and principles, and advance our vision for the future of mobility. GM engages in lobbying and participates in various business associations and public policy organizations that advocate on issues important to the company.

We believe that strong, transparent engagement is a critical and appropriate role for companies. GM complies with federal, state, and local lobbying and campaign finance laws, discloses its lobbying activities and political contributions, and administers a robust training and compliance program.

### **GOVERNANCE, DECISION-MAKING, AND MITIGATING REPUTATIONAL RISKS**

GM’s Board of Directors Governance and Corporate Responsibility Committee (GCRC) oversees the Company’s policies and strategies related to corporate responsibility, sustainability and U.S. political contributions and lobbying activities. The Committee receives regular reports regarding GM’s policy priorities and reviews the company’s political engagement strategy, including political contributions and lobbying expenditures made during the past year, and previews the framework for the coming year. During this review the Board can seek adjustments to the framework. The Board also receives frequent updates from management regarding significant global policy issues facing the Company. While our Board and the Executive Vice President for Policy, Cyber and Legal provide oversight, the Vice President, Global Public Policy is responsible for the daily activities consistent with this oversight.

#### *Additional Governance*

Procedurally, corporate political spending plans and decisions are reviewed and approved by select senior management based on the framework reviewed with the GCRC.

Federal law generally does not permit contributions, including in kind contributions, by corporations to candidates for federal office or national party committees, but

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corporations may make contributions to candidates running for state or local office in some states and may contribute to various organizations that engage in political activities. GM complies with all applicable laws and regulations (e.g., reporting and disclosure requirements) in all regions it operates, including U.S. federal, state, and local jurisdictions.

### **TRADE ASSOCIATION AND BUSINESS MEMBERSHIPS**

GM holds memberships in industry, trade and business associations representing the automotive industry and the business community. Engaging with other stakeholders helps us gain perspective and views on public policy issues that impact our company. Additionally, participating in a broad array of groups expands the company's ability to build coalitions in support of its policy positions.

GM does not agree with all the positions of every industry, trade, or policy organization in which it participates. However, through participation and active engagement with these organizations, GM seeks to influence their positions in a manner that aligns with GM's interests.

### **TRANSPARENCY AND DISCLOSURE**

As part of our overall effort to promote political transparency and accountability, GM voluntarily publishes an annual report of political contributions (available at [investor.gm.com/resources](http://investor.gm.com/resources)).

In addition, GM files publicly available federal Lobbying Disclosure Act Reports each quarter, which disclose GM's federal lobbying expenditures, describes legislation and issues covered by lobbying activities, and identifies the registered individuals who lobbied on behalf of GM. GM also files similar periodic reports with states and localities as applicable. Links to these reports are also available at [investor.gm.com/resources](http://investor.gm.com/resources).

In recognition of the best-in-class nature of GM's disclosure, the Center for Political Accountability's Zicklin Index of Corporate Political Accountability and Disclosure, which benchmarks the political disclosure and accountability policies and practices of leading U.S. public companies, has recognized the quality of our disclosures and ranked GM among the First Tier of S&P 500 companies.

### **POLICY REGARDING MAKING POLITICAL CONTRIBUTIONS AND EXPENDITURES**

Using the following criteria, GM's Political Action Committee (GM PAC) contributions are guided by a Board of Directors appointed by the Chief Executive Officer of GM:

- (1) Representation of a district with a GM facility and/or employees, retirees, and other constituents of importance (e.g., suppliers);
- (2) General support of issues of importance to GM and/or the industry; and,

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(3) Placement in a leadership position or on a key committee of importance to GM and/or the industry.

Even if a candidate meets the base criteria, a candidate can be disqualified from receiving contributions from GM if:

- a) the candidate, while seeking or holding a public office is found guilty of a felony or a misdemeanor involving moral turpitude; or
- (b) espouses or endorses public positions which are persistently and patently inconsistent with GM's stated corporate values.

Direct corporate political contributions will be guided by the above set of criteria.

All GM PAC and direct corporate political contributions will be made to promote the interests of GM and without regard to the private political preferences of any employee.

### **CORPORATE POLITICAL CONTRIBUTIONS**

General Motors makes corporate political contributions in connection with U.S. state or local elections as permitted by law. GM contributes to political parties, political action committees and ballot measure committees in furtherance of public policies that support the company's business goals. General Motors does not make independent expenditures to expressly advocate for the election or defeat of candidates.

To promote transparency, in addition to our legally required reporting, GM annually discloses political contributions March 1 following the year in which the contributions were made. The disclosure includes the following information on GM's publicly available website:

- A copy of the General Motors U.S. Corporate Political Contributions and Expenditures Policy;
- A list of the amounts and recipients of corporate contributions to section 527 organizations;
- A list of the amounts and recipients of corporate contributions to ballot initiatives;
- A list of the amounts and recipients of corporate contributions made to individual candidates for state or local office;
- For each U.S. organization identified as tax-exempt by the Internal Revenue Service as either a section 501(c)(6) trade association or a section 501(c)(4) social welfare organization that receives at least \$50,000 in dues or similar payments during a given year, the portion of the payments that is identified by the organization as being used for non-deductible political expenditures; and
- A link to the Federal Election Commission (FEC) website which details employee contributions to the federal GM PAC as well as amounts and recipients of GM PAC contributions.

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Consistent with our commitment to ethical business conduct, political spending reflects General Motors interests and is not based on the personal interests of any of our individual officers, directors, or employees. Furthermore, no contributions are given in anticipation of, in recognition of, or in return for any official act.

### **EMPLOYEE POLITICAL ACTIVITY**

Some GM employees take an active role through the voluntary GM PAC. GM PAC, and associated state PACs, are independent of any political party. They are designed to provide employees the ability to make financial contributions that can be used to support candidates and participate in the political process. Our employee political action committee spending plans are reviewed and approved by the Political Action Committee's Steering Committee and receive compliance clearance before checks are issued.

### **POLITICAL COMPLIANCE**

General Motors Legal Staff assists with compliance with laws including reporting obligations. In addition:

- GM provides training for employees identified as having the potential for interface with public officials; and
- GM's intranet site includes policies related to political reporting and compliance, lobbying, gifts, contributions, and political fundraising.

The Executive Vice President, Policy, Cyber and Legal oversees GM's corporate political activity and the GM PAC.

## 2022 STATE AND LOCAL POLICY PRIORITIES

### AUTONOMOUS VEHICLES

GM advocates for legislative and regulatory opportunities that provide for the safe expansion and use of self-driving vehicle systems. On the state and local levels, GM works closely with governments to allow testing and deployment of self-driving vehicles without human drivers, as well as advocates for other key issues that support GM's Mobility initiatives.

### ELECTRIC VEHICLES & CHARGING INFRASTRUCTURE

GM advocates for the advancement and investment in electric vehicle incentives and charging infrastructure in states across the United States. In 2022, GM supports and advocates for state deployment of the charging infrastructure resources pursuant to the passage of the federal Infrastructure Investment and Jobs Act (IIJA). GM supports state and local policies that aid in the adoption of electric vehicles by Americans and help fuel GM's vision of Zero Crashes, Zero Emissions, and Zero Congestion.

### ECONOMIC DEVELOPMENT

Today, GM is directly responsible for more than 95,000 US jobs and is the economic lifeblood of communities throughout the country. GM works closely with state and local governments on economic development opportunities to strengthen American manufacturing, job creation and retention.

### CYBERSECURITY AND DATA PRIVACY

When business competitors, lawmakers, special interest groups, etc. seek state public policy mandates to secure their access to customer and vehicle data, GM engages to protect our customers and the company from policies which would create unnecessary cybersecurity and privacy risks.

### DEALER FRANCHISE

Each year, GM engages with state legislatures when state auto dealer trade associations seek to modify state auto dealer franchise laws with the intention of limiting manufacturers' authority to implement policies and practices established through dealer sales and service agreements. These issues have the potential to raise costs and complexity for auto manufacturers and dramatically increase vehicle and auto parts prices for consumers. In recent years, states have introduced legislation to regulate warranty reimbursement for parts and labor, vehicle subscription services, measures to prohibit manufacturers' sale of parts, as well as restrictions on manufacturer vehicle sales incentives and dealer facility programs.

## **LEMON LAWS**

Every interaction with a GM customer is important. Current abuses of the Lemon Law in certain states by a small group of attorneys harm customers through excessive delays and fees. GM supports the changes proposed by the Civil Justice Association of California.

## **WORKFORCE DEVELOPMENT**

As demand for EVs increases, GM needs programs that develop a domestic workforce with the necessary skills to support growth and competitiveness of EV supply chains and manufacturing.

## 2022 FEDERAL POLICY PRIORITIES

### AUTONOMOUS VEHICLES

GM is proactively advocating to create the federal legal and regulatory environment that will enable the safe deployment of self-driving vehicles. Our team is working with Congress on legislation to clarify federal and state regulatory responsibilities, update Federal Motor Vehicle Safety Standards (FMVSS) for self-driving vehicles, and expand National Highway Traffic Safety Administration (“NHTSA”)-granted exemptions to allow for vehicle deployment.

### ELECTRIC VEHICLES & CHARGING INFRASTRUCTURE

GM is committed to a future with zero emissions and accelerating deployment of EVs for everyday use. GM advocates for federal advancement and investment in electric vehicle incentives and charging infrastructure across the United States. Furthermore, GM supports expansion of the federal electric vehicle tax incentive, which plays an important role in consumer adoption of EVs.

### FUEL ECONOMY

GM supports modernizing fuel economy standards and creating one national program. This is why GM has called for a U.S. National Zero Emissions Vehicle (NZEV) program. We will work with the Biden Administration through the Environmental Protection Agency and NHTSA along with the California Air Resources Board to encourage support for this program on our way to a Zero Emission future.

### INTERNATIONAL COMPETITIVENESS AND SUPPLY CHAINS

GM advocates for policies that contribute to the future success of American manufacturing and keeps our country’s vehicles and services competitive on a global scale. Our advocacy efforts focus on issues vital to developing secure, sustainable, and scalable supply chains for components critical to achieving GM’s Zero, Zero, Zero vision. These components include semiconductors, batteries, and critical minerals, among others. Secure, sustainable, scalable, and cost-competitive value chains are key to enabling an all-electric, clean transportation future.

### SAFETY

Safety is a top priority for GM. Public Policy works directly with policymakers throughout the country as well as federal regulators at NHTSA to focus on safe vehicles and roadways for all.

Distracted driving, the safe deployment of self-driving vehicles, passenger safety and product cybersecurity are all top policy issues for GM. We have advocated for strong safety legislation on the state and federal levels, including safety legislation that was recently enacted as part of the Infrastructure Investment and Jobs Act (IIJA).

**2021 PUBLIC POLICY TRADE ASSOCIATION MEMBERSHIPS  
(501(C)(6) ORGANIZATIONS, \$25,000+ IN DUES)**

**\$1 Million+**

Alliance for Automotive Innovation  
American Automotive Policy Council

**\$200-\$500,000**

Business Roundtable  
National Association of Manufacturers  
TechNet  
U.S. Chamber of Commerce and Institute for Legal Reform

**\$100,001-\$200,000**

Engine Manufacturers Association

**\$50,001-\$100,000**

Diesel Technology Forum  
National Center for APEC  
Business Forward

**\$25,000-\$50,000**

Detroit Regional Chamber  
Consumer Technology Association  
California Electric  
Michigan Manufacturers Association  
U.S. Council for International Business  
Business Software Alliance  
Electric Drive Transportation Association  
Alliance for Transportation Electrification  
Michigan Chamber of Commerce



**2021 PUBLIC POLICY ORGANIZATIONAL SUPPORT  
(501(C)(4) ORGANIZATIONS)**

Americans for Carbon Dividends

Americans for Tax Reform

Automotive Coalition for Traffic Safety

Civil Justice Association of California

Congressional Institute

Fortify & Bolster Semiconductor Success Texas Coalition

Imagine Indiana

Independent Voter Project

Advancing Macomb Foundation

Michigan State Society

Ripon Society

Senate Working Group

The National Infrastructure Safety Foundation

The Texas State Society of Washington

None of the support provided by GM to these 501 (C)(4) organizations was used for non-deductible political spending.