



General Motors
Global Platform for Sustainable Nature Rubber
Public Disclosure 2023



GM GPSNR Public Disclosure RY2022

This report represents GM's Global Platform for Sustainable Natural Rubber (GPSNR) disclosure for reporting year 2022. GM is a member of GPSNR and as a member company is required to report progress in implementing the company's [Sustainable Natural Rubber Policy](#) through annual reporting requirements.

GM is a founding member of GPSNR. We strongly encourage all of our applicable suppliers to become members of GPSNR as well and comply with GPSNR's annual disclosure obligations. This year we are pleased to confirm that the following suppliers are each members of GPSNR and that these suppliers represent all of GM's Level B suppliers (Processors and Traders of Raw Material) for this reporting period. In no particular order:

- Goodyear, Michelin, Continental, Maxxis, Hankook, and Bridgestone.

For additional details regarding the response from each of these suppliers, please refer to their annual disclosure report submitted to GPSNR.

GM acknowledges its ability to influence supply chain participants and to establish expectations relating to inputs used in GM products. Therefore, efforts will be focused on preventing the conversion of natural forests within commodities of high deforestation risk in GM's supply chain. These include two specific raw materials sourced by GM suppliers for GM products that may pose risk for deforestation and/or conversion: (1) natural rubber and (2) leather. GM's membership in GPSNR, as well as our suppliers joining GPSNR, is part of working to address these concerns. This report is a part of those efforts.



D1.1.1

Question: What system does the member use to ensure they are aware of all applicable local, national and international laws on human rights, labor, land use, and the environment, in relation to the member's natural rubber supply chain, and how often are legal requirements reviewed or revised? Provide details of the system used to track legal requirements, including frequency of review/revision (months/years/other).

Response:

GM has designated teams responsible for applicable emerging ESG legislation, with a process in place to communicate the information to the responsible parties for program implementation and requirements (public policy, global policy). Review is on an ongoing basis. As members of Responsible Business Alliance (RBA), we have a list of all responsible sourcing applicable legislations.



D1.1.2

Question: If the member systematically assesses their own legal compliance, how frequently are compliance assessments conducted? (months/years/other). If not conducted, explain why.

Response:

Our largest suppliers must attest to compliance with our Terms and Conditions, Supplier Code of Conduct, and all applicable laws and regulations. This attestation occurs annually via a supplier compliance survey. GM periodically conducts supplier compliance surveys to confirm compliance as per the Corporate Human Rights Benchmark.

The Governance and Corporate Responsibility Committee oversees the Political Contributions Policy and annually reviews the company's engagement in the public policy process.



D1.2.1

Question: How does the member manage or monitor risk of corruption related to their operations?

Response:

The member manages corruption through:

- anti-corruption policy [X],
- employee code of conduct [X],
- employee training [X],
- supply chain corruption risk assessments [],
- whistleblower mechanism [X],
- inclusion of compliance with anti-corruption policy in employee evaluation [],
- disciplinary procedures and enforcement [X],
- third party due diligence and oversight [X]
- other [X]

For additional information, please see: <https://www.gmsustainability.com/governance/>



D1.2.3

Question: How does the member train staff on anti- corruption? Provide details, including # or % staff, frequency of training, and methods of delivery.

Response:

We require all eligible salaried employees to complete online Corporate Required Training courses annually. This is available in seven languages, and we deploy new or refreshed content every year. In 2022, we achieved a 100% completion rate across our salaried employees for the required courses, which were: GM Code of Conduct: Winning with Integrity, Cybersecurity, Product and Workplace Safety, Anti-Corruption Compliance. In addition to Corporate Required Training, we require our salaried employees to annually complete Code of Conduct training, certify their agreement to it, and declare that they have disclosed any new potential conflicts of interest and reported any suspected Code violations or safety issues. Board members receive in-person Code of Conduct training delivered by the chief compliance officer. Beyond Corporate Required Training and Code of Conduct training, we use risk-based principles to provide live and remote training to thousands of employees each year on topics such as export compliance, antitrust, Foreign Corrupt Practices Act, privacy, working with third parties, winning in the marketplace without sacrificing our values, the Speak Up! policy and other relevant compliance topics. We also use on-demand microlearning modules so that employees can access refresher training on gifts and entertainment and conflicts of interest processes as needed.

For additional information, please see: https://www.gmsustainability.com/_pdf/resources-and-downloads/GM_2022_SR.pdf#page=99



D2.5.1

Question: What system does the member use to gather data from suppliers relating to water use, water quality and watershed management within their supply chains?

Response:

GM engages with over 300 suppliers through the CDP Water Security Supply Chain and other organizations like AIAG.

GM references EcoVadis in our supply chain, which rates suppliers based on ESG KPI's, including water.

All our direct material strategic suppliers are invited to complete the CDP Climate Change and Water Security surveys, in addition to a subset of indirect suppliers and our top strategic logistics suppliers. In 2022, direct suppliers representing 90% of our budgeted annual purchase value participated in CDP. We reached a response rate of approximately 69% in 2022 among in-scope strategic suppliers and key logistic suppliers with the Water Security survey. Also, among in-scope suppliers, 25% of suppliers are engaging their own suppliers, 78% reporting active target and/or goals, 52% reporting any water related policy, and finally 59% are reporting water accounting.



D3.1.1

Question: Has the member conducted, including entrusting its suppliers to conduct, an assessment of actual and potential adverse impacts on human rights linked to the member’s natural rubber sourcing activities?

Response:

GM is engaged in a saliency assessment process. In 2021, as a part of this process, we conducted desktop research, reviewed industry analyses and connected with external stakeholders. We also held a series of interactive internal capacity building and exploratory workshops with leaders from across the enterprise and geographic footprint to identify and prioritize potential human rights-related impacts. Upon completion of our Saliency Assessment, GM became members of GPSNR.

GM’s Supplier Code of Conduct states “suppliers will have processes and strategies in place to identify and control business risk, legal compliance, environmental, health and safety, and labor practices and ethics risks associated with the supplier’s operations. Suppliers should determine the relative significance for each risk and implement appropriate procedural and physical controls to control the identified risks and meet regulatory compliance. Suppliers will continually monitor and enforce these standards in their operations and supply chain including subcontractors.”

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For additional details regarding the response from each of these suppliers, please refer to their annual disclosure report submitted to GPSNR.



D3.1.2

Question: If the response to D3.1.1 is yes, what methodology/ies did the member and/or its suppliers follow?

Response:

GM's saliency assessment was conducted in accordance with the standard methodology as described in the UN guiding principles.

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D3.2.1

Question:) Is the member's grievance mechanism publicly available to internal and external stakeholders in their natural rubber supply chain?

Response:

GM's Supplier Code of Conduct (available externally and internally) states: Suppliers will provide a clearly communicated grievance mechanism, in local languages, for workers to utilize to report integrity concerns, human rights concerns, safety issues, and misconduct without fear of reprisal.

GM is a member of Responsible Business Alliance (RBA). As part of the organization, we utilize the RBA Voices Tool, which is a medium for workers to file anonymous complaints regarding human rights, safety, and misconduct concerns without fear of repercussion.

Additionally, GM utilizes AwareLine, Speak Up For Safety, and other tools, which our suppliers can use to voice concerns regarding any potential human rights and environmental violations.

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D3.2.2

Question: Does the member maintain a record of grievances raised?

Response:

The GM Awareline—operated by an independent third party— allows employees and others to anonymously (where permitted by law) report concerns in over a dozen languages at any time by phone, web or email. In 2022, GM received 5,715 reports to the Awareline; 4,039 were classified as allegations, with the remaining classified as suggestions, inquiries and other issues (Sustainability Report).

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D3.2.3

Question: What actions are being taken to address unresolved grievances?

Response:

If a potential human rights issue is identified in our supply chain, we initiate a three-step process to gather information, raise internal awareness and address the issue.

1. The GPSC Compliance Team researches the validity of the inquiry and potentially implicated suppliers.
2. The team raises internal awareness with GPSC management, legal and other applicable groups.
3. An appropriate response is developed based on the situation.

GM supplier representatives may contact implicated Tier I suppliers to investigate the issue and discuss potential corrective actions and improvement opportunities. Corrective actions are tracked until closure, with timing dependent on the circumstances. If the supplier is not cooperative or corrective actions are not closed to GM standards, GPSC management may explore alternative corrective actions up to and including re-sourcing.

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D3.6.5

Question: Does the member follow a nationally/internationally/industry recognized standard or system for managing health and safety in the workplace? If not, what measures have been taken to ensure health and safety is maintained to minimum ILO and/or legally required standards (whichever is higher/more stringent)?

Response:

Our global safety management system, Workplace Safety System (WSS), drives continuous improvement across all five global workplace safety dimensions: Culture, Knowledge, Systems, Data-Driven Decisions and Risk Mitigation. It is aligned with our continuous improvement philosophy and internationally recognized standards such as International Organization for Standardization (ISO) 45001. WSS includes a set of tools designed to drive continuous improvement through the Plan-Do-Check-Act (PDCA) cycle. The system has five components across the PDCA cycle: Policy, Risk Identification & Control, Operation, Process Validation and Leadership Review. We use global procedures, performance, and technical standards to reinforce our goals, objectives and behavioral expectations for safety. These are based on recognized international standards such as ISO, Occupational Health & Safety Administration (OSHA) and American National Standards Institute (ANSI) and are mandatory for all GM operating units. Our governance process for WSS includes annual site self assessments, validations conducted by global or regional safety teams, and independent internal safety audits conducted by GM Audit Services, providing oversight to the Board. In 2022, our sites continued to enhance WSS and created high-risk performance standards teams to accelerate safety culture improvements.

The United Nations Guiding Principles on Business and Human Rights serve as a guiding framework for GM's work related to human rights. GM is also committed, and expects suppliers to commit, to the OECD Guidelines for Multinational Enterprises; the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work; the International Bill of Human Rights; the Universal Declaration of Human Rights; and the International Covenant on Economic, Social and Cultural Rights.

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D3.6.6

Question: Have there been any accidents, injuries or fatalities in the workplace in the last reporting period?

Response:

During the 2022 reporting year, The Lost Workday Case Rate¹ (Number of lost workday injuries and illnesses per 1,000,000 work hours) was 1.96 for GM employees and 0.37 for contractors.

The Recordable Incident Rate (Number of incidents that resulted in injuries or illnesses that required medical treatment beyond simple first aid treatment per 1,000,000 work hours) for GM employees and contractors was 6.67.²

The number of fatalities for GM employees, Contracted Workers, and Contractors as defined in GM's Sustainability Report was 0.

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¹ Number of lost workday injuries and illnesses per 1,000,000 work hours. This key performance indicator focuses on those injuries and illnesses that resulted in contractors losing days from work. This helps us identify areas and processes where we should center our focus to improve our safety controls.

² Number of incidents that resulted in injuries or illnesses that required medical treatment beyond simple first aid treatment per 1,000,000 work hours. This metric helps to identify hazards, eliminate risks and drive reporting for all incidents so that we can identify and assess areas for improvement.



D5.2.1

Question: Does the member track its energy use? What is the energy use (gross and intensity) of the last reporting period?

Response:

kWh / kg or equivalent: 50,652,702 GJ (our own operations, 2022)

For additional details, please see: <https://www.gmsustainability.com/environment/>

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D5.2.2

Question: What targets does the member have for the reduction of energy use within their direct operations?

Response:

- Target reduction (indicate if this is gross or intensity): 35% reduction in energy intensity (our own operations)
- Baseline year: 2010
- Target year: 2035

For additional details, please see: <https://www.gmsustainability.com/environment/>

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D5.2.3

Question: What measures are in place to optimize or reduce energy use within their direct operations?

Response:

Buildings certified by ENERGY STAR use less energy, save money and generate fewer GHG emissions. To be certified as an ENERGY STAR building, it must meet strict energy performance standards set by the Environmental Protection Agency (EPA) and outperform at least 75% of similar buildings nationwide. In 2022, we received four new certifications: Fort Wayne Assembly, Flint Assembly, Milford Enterprise Data Center and Arizona IT Innovation Center. In 2022, we met the EPA ENERGY STAR Challenge for Industry at seven sites by reducing energy intensity by an average of about 18%. To meet the EPA Challenge, industrial sites must reduce their source energy intensity by at least 10% within a five-year period. In total, 71 GM manufacturing sites have met the EPA Challenge, with many sites achieving the goal multiple times for a total of 139 recognitions. In 2022, we conducted 13 on-site ENERGY STAR treasure hunts, through which we found 194 energy-saving opportunities that could save the company approximately \$13 million.

In partnership with our suppliers, we conduct energy treasure hunts to drive energy- and water-reduction efforts at Tier I and Tier II supplier facilities. The program's success is embedded in its collaborative framework, identifying potential energy reduction and financial savings opportunities at suppliers' manufacturing facilities. Each project uses an iteratively developed tool for data collection and assessment. These treasure hunts collectively provided recommendations to save approximately 14,000 MWh of energy and 41,000 cubic meters of water, as well as eliminating 4,600 metric tons of CO₂ emissions³.

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³ Supplier self-reported data



D5.3.1

Question: How does the member manage their operations / supply chain to maximize natural resource efficiency, including material efficiency?

Response:

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D5.3.2

Question: What measures are in place to reduce waste?

Response:

We are working toward our Zero Waste⁴ ambition by treating waste as a useful resource that is out of place rather than something for disposal. Diverted 1.33 million metric tons of waste from landfills, incinerators and energy recovery facilities. Achieved a waste diversion rate of 91.8%, meeting our 2025 goal of 90% three years early⁵.

Through the Zero Waste⁶ initiative, cross functional teams visit specified facilities to identify opportunities and best practices for reducing waste. In 2022, we led Zero Waste⁷ treasure hunts at nine sites across the United States, Mexico and Brazil. Informal treasure hunts were conducted across all GM regions: North America, South America, China and International.

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⁴ GM's waste program represents the percentage of waste diverted from landfill, incinerators and energy recovery compared to a three-year average (2017–2019) baseline of total operational waste generated and is based on the Zero Waste International Alliance (ZWIA) to reflect a 90% diversion threshold.

⁵ Total operational waste is defined as all relevant waste streams ($\geq 98\%$ of reported operational waste) that are not generated due to construction, demolition or remediation activities.

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D5.3.3

Question: What targets does the member have for the improvement of natural resource efficiency?

Response:

- Parameter: Water
- Target: 35% intensity reduction (our own operations)
- Baseline year: 2010
- Target year: 2035

For additional details, please see: <https://www.gmsustainability.com/environment/>

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D5.4.1

Question: Does the member monitor carbon emission intensity? If yes, what are the calculated figures and what method is used for calculations?

Response: Yes.

Scope 1 emission: 1,466,452 Metric Tons^{8,9}

Scope 2 emissions:

- 2,996,074 Metric Tons (location-based)^{10,11}
- 2,078.738 Metric Tons (market-based)^{12,13}

Scope 3 emissions: 272,722,604 Metric Tons¹⁴

For additional information, please see the General Motors Sustainability Report:

https://www.gmsustainability.com/pdf/resources-and-downloads/GM_2022_SR.pdf

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⁸ Baseline year 2018, and includes all facilities under GM operational control. Calculation includes CO₂, CH₄ and N₂O. Reporting is based on GHG Protocol, and the source of emission factors is regulatory or IPCC Good Practice Guidelines

⁹ GM's scope 1 emissions are generated from use of fossil fuels, mostly natural gas for process and building heat.

¹⁰ Baseline year 2018, and includes all facilities under GM operational control. Calculation includes CO₂, CH₄ and N₂O. Reporting is based on GHG Protocol, and the source of emission factors is regulatory or IPCC Good Practice Guidelines

¹¹ GM's scope 2 emissions are mostly from electricity used in our operations for process and building with some purchased steam and delivered heat by third parties.

¹² Baseline year 2018, and includes all facilities under GM operational control. Calculation includes CO₂, CH₄ and N₂O. Reporting is based on GHG Protocol, and the source of emission factors is regulatory or IPCC Good Practice Guidelines

¹³ GM's scope 2 emissions are mostly from electricity used in our operations for process and building with some purchased steam and delivered heat by third parties.

¹⁴ GM's scope 3 emissions are calculated in reference to the GHG Protocol (<https://ghgprotocol.org/>) for all 15 categories. Category 11, use of sold products, is calculated using the Well to Wheels (WTW) method, consistent with the Science Based Targets Initiative's requirements



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D5.4.2

Question: Does the member have targets to reduce carbon emissions? If yes, please state targets.

Response: Yes.

By 2040: Carbon neutrality in global products and operations

By 2035: Reduce Scope 1 and 2 operations emissions by 72% against a 2018 baseline

- Target reduction: 72% reduction
- Baseline year: 2018
- Target year:2035

By 2035: Reduce Scope 3 emissions from the use of sold products of light-duty vehicles by 51% per vehicle kilometer against a 2018 baseline

By 2035: Eliminate tailpipe emissions from new U.S light-duty vehicles.

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D5.4.3

Question: What measures are in place to minimize carbon emissions?

Response:

GM has a variety of measures and strategies in place to minimize carbon emissions and support our goal of becoming carbon neutral in our global products and operations by 2040.

State measures: Improving energy efficiency, sourcing renewable energy, addressing intermittency and policy advocacy.

To manage our Scope 3 emissions from our upstream supply chain, we have invited our Tier I suppliers to sign the GM ESG Partnership Pledge to show their commitment to the principles of sustainability and human rights; encourage global Tier I suppliers to set carbon reduction goals using the GM Partner Sustainability Framework; and we monitor our suppliers' environmental and social progress through CDP and EcoVadis; and by joining the First Movers Coalition through commitments to low-carbon steel, aluminum, concrete and cement, signaling a firm market demand for a net-zero transition.

To reduce Scope 3 emissions from the use of our sold products, we are taking bold action to reach 1 million or more planned units of EV capacity in North America by 2025 and we plan to eliminate tailpipe emissions from new light-duty vehicles by 2035.

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D5.4.4

Question: What is the member's energy mix?

Response:

Total energy use (of all sources): 50,652,702 GJ

Proportion of total energy mix of each

- 49.3% Fuel consumption (non-renewable sources)
- 2.4% Fuel consumption (renewable sources)
- 46.3% Electricity
2% steam consumption

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D6.1.1

Question: Does the member's policy cover all components of the GPSNR Policy Framework?

Response:

- Yes, all policy components covered: Yes, GM's [Sustainable Natural Rubber Policy](#) covers all components of the GPSNR Policy Framework, as agreed to in the High Level Commitment.
- Link to publicly available policy:
https://www.gmsustainability.com/_pdf/policies/GM_Sustainable_Natural_Rubber_Policy.pdf



D6.1.2

Question: Has the member set public targets for all components in the GPSNR Policy Framework, and are these targets timebound and geographic specific?

Response:

- Partial, only some policy components have timebound / geographic specific targets (explain why): GM is committed to addressing ecosystem conversion and biodiversity loss by promoting the uptake of sustainable natural rubber in our global natural rubber supply chains. Our commitment to promote the sourcing of natural rubber products that are produced and processed in line with GPSNR policy requirements is one which we take seriously. GPSNR is currently working on developing an assurance model roadmap including KPIs that will have timebound and geographic specific targets.



D6.2.2

Question: What KPIs does the member use that are specifically related to company performance against sustainability commitments? Indicate whether the KPIs are specific to GPSNR commitments or aggregated with broader corporate sustainability commitments.

Response:

- List KPIs or link to online document: Our full suite of public indicators is available here: <https://www.gmsustainability.com/data-center.html>



D6.4.1

Question: List all multi-stakeholder planning and/or policy efforts that uphold the GPSNR principles that the member participates in.

Response:

GM engages with the Climate Equity Fund, United Nations Global Compact, Supplier Business Council, Automotive Industry Action Group (AIAG), RBA, among others.

The GPSNR principles are embedded in our Human Rights Policy, GM Code of Conduct, Supplier Code of Conduct, and the GM [Sustainable Natural Rubber Policy](#).



D6.4.3

Question: If the member is involved in any other collaborative efforts or initiatives that contribute to upholding GPSNR principles that are not otherwise listed in this report, provide details here.

Response:

N/A



D7.3.1

Question: Do you communicate the requirement to conform with GPSNR policy components to your natural rubber supply chain business partners?

Response:

GM and all GM tire suppliers are GPSNR members. We promote the GPSNR's guiding principles to our suppliers. GM's baseline requirements for suppliers enrolled in our Sustainability Goals Framework include industry specific participation (e.g., GPSNR).

As a company, we will work within our own operations, and expect our suppliers to work within their operations, to increasingly source and promote the sourcing of natural rubber products that are produced and processed in line with GPSNR policy requirements.

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D7.3.3

Question: Excluding supplier contracts, does the member have other mechanisms to communicate the preference for GPSNR conforming product to suppliers?

What proportion of total input volume is sourced from GPSNR members?

Response:

Percentage sourced from GPSNR members: 100%

GM and all GM tire suppliers are GPSNR members. We promote the GPSNR's guiding principles to our suppliers. GM's baseline requirements for suppliers enrolled in our Sustainability Goals Framework include industry specific participation (e.g., GPSNR).

GM is a founding member of GPSNR. We strongly encourage all of our applicable suppliers to become members of GPSNR as well and comply with GPSNR's annual disclosure obligations. This year we are pleased to confirm that the following suppliers are each members of GPSNR and that these suppliers represent all of GM's Level B suppliers (Processors and Traders of Raw Material) for this reporting period. In no particular order:

- Goodyear, Michelin, Continental, Maxxis, Hankook, and Bridgestone.

For additional details regarding the response from each of these suppliers, please refer to their annual disclosure report submitted to GPSNR.



D8.2.1

Question: If the member publicly reports on performance and/or progress towards meeting natural rubber sustainability commitments, where is the information published, and how is it communicated?

Response:

- Provide link (include page number references if applicable): Link to RY2021 GM GPSNR Public Disclosure Report:
https://www.gmsustainability.com/_pdf/policies/GM_GPSNR_Public_Disclosure_Report_Final.pdf
- Date of last report: RY2021
- State how information is communicated:
GM publishes an annual disclosure related to our performance and progress on sustainable natural rubber on GM's website. Due to the potentially commercially sensitive nature of some of the information, the full disclosure will not be shared publicly, but will be made available on a limited basis within GPSNR.

Information on our progress against our corporate-wide sustainability goals may be found on our sustainability website at [gmsustainability.com](https://www.gmsustainability.com).



Forward Looking Statements

This report may include “forward-looking statements” within the meaning of the U.S. federal securities laws. Forward-looking statements are any statements other than statements of historical fact. Forward-looking statements represent our current judgment about possible future events. In making these statements, we rely upon assumptions and analysis based on our experience and perception of historical trends, current conditions and expected future developments, as well as other factors we consider appropriate under the circumstances. We believe these judgments are reasonable, but these statements are not guarantees of any future events or financial results, and our actual results may differ materially due to a variety of factors, many of which are described in our most recent Annual Report on Form 10-K and our other filings with the U.S. Securities and Exchange Commission. We caution readers not to place undue reliance on forward-looking statements. Forward-looking statements speak only as of the date they are made, and we undertake no obligation to update publicly or otherwise revise any forward-looking statements, whether as a result of new information, future events or other factors that affect the subject of these statements, except where we are expressly required to do so by law.