



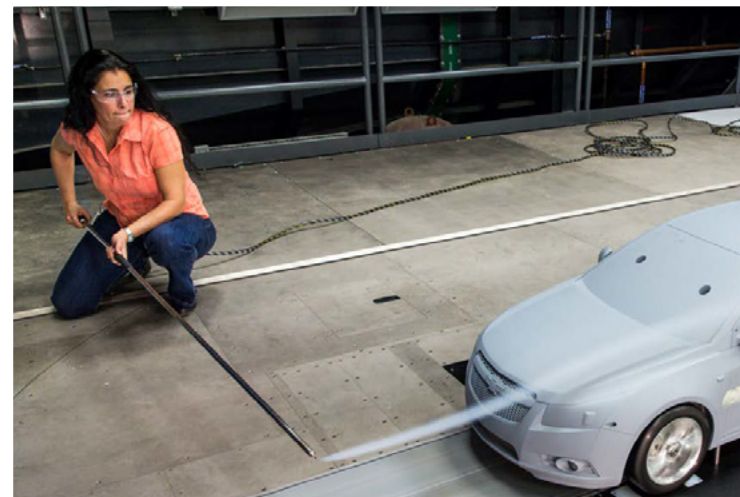
2021 Corporate Human Rights Benchmark (CHRB) Disclosure

Introduction

GM's vision is a world with zero crashes, zero emissions and zero congestion, and we aspire to be the most inclusive company in the world.

Our pursuit of this vision means creating an equitable, safe and all-electric future for everyone—our customers, employees, dealers, investors, neighbors and suppliers. As we pioneer the innovations that move and connect people to what matters, we are committed to recognizing and upholding the inherent dignity and basic human rights of all people.

This document is a disclosure against the automotive framework developed by the Corporate Human Rights Benchmark (CHRB), which is based on the UN Guiding Principles on Business and Human Rights. To learn more about our environmental, social and governance (ESG) priorities, please see the 2021 GM Sustainability Report or visit www.gmsustainability.com.



About This Disclosure

This disclosure covers certain metrics and data for GM as of and during the year ended December 31, 2021, as applicable, unless otherwise stated. In instances where select information is provided from an earlier period or early 2022, that is noted in the disclosure. The disclosure is limited to automotive operations wholly owned and/or operated by GM as well as the supply chain of those automotive operations. Unless otherwise stated, GM Financial, our financing services provider, and Cruise, our autonomous vehicle subsidiary, are not included in the disclosure. In some instances, data has been included for operations in which GM's interest is through joint ventures, including our automotive China joint ventures. In these instances, the inclusion of that data is noted. This disclosure was published on June 1, 2022.

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.



A: Governance and policy commitments



A.1: Policy commitments

In 2021, General Motors (GM) updated and strengthened our [Human Rights Policy](#), underscoring our recognition that businesses such as GM have a responsibility to respect the human rights of people. A key part of this responsibility is recognizing and addressing potential adverse impacts a business can have on people throughout its enterprise, and taking steps to prevent, mitigate and, where appropriate, remediate those impacts. The full policy, which was reviewed and approved by the Governance and Corporate Responsibility Committee (GCRC) of the Board of Directors, is available [here](#).

Highlights of the new policy include:

- A commitment to respect all internationally recognized human rights, including those described in the [United Nations Global Compact \(UNGC\)](#), [Universal Declaration of Human Rights](#), the [International Labour Organization’s \(ILO\) Declaration on Fundamental Principles and Rights at Work \(the ILO Core Conventions\)](#), and the [Organisation for Economic Co-operation and Development \(OECD\) Guidelines for Multinational Enterprises](#). The United Nations (UN) Guiding Principles on Business and Human Rights provide the primary framework for our human rights program.
- A commitment to respect the rights of human rights defenders—people who speak up on behalf of those whose rights may be threatened. The policy states that GM will “neither tolerate nor knowingly contribute to threats, intimidation or attacks against human rights defenders in relation to our operations” and encourages our suppliers to make the same commitment.
- An underscored commitment to respect the rights of people who may be particularly vulnerable—Indigenous peoples, women, children, migrant workers and people with disabilities, among others, and our expectation that suppliers share in this commitment.
- An expectation that our suppliers also respect the ILO Core Conventions.
- A reiteration of our commitment to provide safe and healthy working conditions for GM employees and our expectation that suppliers also provide safe and healthy environments for their employees.



A: Governance and policy commitments

A.1: Policy commitments Our Human Rights Policy is complemented by GM's [Supplier Code of Conduct](#). Suppliers are expected to understand and act consistent with GM's approach to integrity, responsible sourcing and supply chain management. GM expects that its suppliers will cascade similar expectations through their own supply chains. These expectations reinforce GM's zero-tolerance policy against the use of child labor in the supply of goods and services to GM.

In addition, we have recently published our [Conflict Minerals](#) and [Responsible Minerals Sourcing Policies](#). Both the policies and Supplier Code of Conduct include commitments to the responsible sourcing of minerals, which may be used in many of the advanced technologies in our portfolio and that are potentially mined in conflict-affected and high-risk areas.

The Conflict Minerals Policy and Responsible Minerals Sourcing Policy are aligned with the [OECD](#) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and we expect that our suppliers and their respective suppliers adhere to the OECD Guidance as well. The OECD Guidance promotes transparent mineral supply chains and sustainable corporate engagement in the mineral sector to enable countries to benefit from their mineral resources and prevent the extraction and trade of minerals from becoming a source of conflict and human rights abuses.

The following GM policies also address our commitment to respect human rights:

- [GM Code of Conduct](#)
- [Integrity Policy](#)
- [Sustainable Natural Rubber Policy](#)
- [Global Privacy Policy](#)
- [Non-Retaliation Policy](#)
- [Anti-Harassment Policy](#)

A.2: Board-level accountability

Human rights is an important issue addressed both by the Board and cross-functionally across the company. The Board provides regular oversight of human rights-related issues and topics, including but not limited to routine workplace safety reviews, and addresses human capital management and supply chain matters as needed. The Board also considers human rights expertise as part of its annual ESG self-evaluation to ensure it has the requisite skills and expertise to oversee the Company's ESG opportunities, priorities and risks.

As outlined in its [charter](#), the Board's GCRC has primary oversight responsibility for human rights and conducts reviews of GM's human rights practices (including responsible sourcing practices). Additionally, the Board delegated to the GCRC oversight of the Company's development of ESG initiatives, strategies, policies and practices related to matters of sustainability and corporate responsibility that may have a material impact on the Company.

Other committees of the Board, including the [Audit Committee](#), the [Executive Compensation Committee](#) and the [Risk and Cybersecurity Committee](#), also engage with human rights-related matters as needed. For example, the Risk and Cybersecurity Committee is updated regularly on changes to our enterprise risk landscape and emerging risks that may lie ahead. These updates could, and have in past versions, include risks related to human rights.



B: Embedding respect and human rights due diligence

B.1.1: Responsibility and resources for day-to-day human rights functions

Many GM corporate policies, including our Human Rights Policy, have a corresponding executive-in-charge who administers the policy. For GM's Human Rights Policy, the chief sustainability officer (CSO) is the executive-in-charge.

As human rights-related issues are connected with many different parts of the business, numerous senior leaders also have human rights-related responsibilities and accountability. For example, senior leaders from Global Purchasing and Supply Chain (GPSC) are responsible for monitoring that human rights across our supply chain are respected, with a particular focus on the issues we have identified as being salient; senior leaders from Human Resources are responsible for monitoring that the human rights of our global workforce are respected; and senior leaders from within Global Public Policy and Legal as well as Human Resources are responsible for monitoring compliance with human rights-related laws and regulations and for the effectiveness and ongoing operations of our grievance mechanism, the Awareline.

Each of these senior leaders, and others, are responsible for setting strategy in alignment with GM's overall Human Rights Policy and for structuring and resourcing the day-to-day management as appropriate. For instance, within the GPSC function, a new ethical sourcing team is actively working to establish the policies and practices needed to effectively monitor the salient human rights issues found within our supply base. Other areas, such as Human Resources and Labor Relations already have existing teams, policies, systems and practices, so the current focus there is on identifying gaps and developing effective monitoring systems.

GM's Global Sustainability Strategies Team serves to convene, inform, coordinate, and build capacity with respect to human rights among these functional areas and to promote the inclusion of external stakeholders (particularly those that could be potentially impacted) and their perspectives in internal conversations and decisions. This includes check-ins and evaluations to understand current challenges and opportunities and ensure the requisite knowledge, tools and resources are available.



B: Embedding respect and human rights due diligence

B.1.2: Incentives and performance management

The Company's short-term incentive plan (STIP) includes strategic goals that make up 25% of the annual STIP award for each of our named executive officers (NEOs), and the Company's ESG performance is factored into these strategic goals. For example, our STIP includes strategic goals related to 'Our People' (e.g., attracting, retaining and engaging our people by providing the best employee experience that supports and invests in diversity, equity and inclusion, while living values and behaviors that return people home safely every day) and 'Citizenship' (e.g., prioritizing actions that are inclusive for the communities in which we live and work, including implementation of our plan to become carbon neutral in our global products and operations by 2040 and eliminate tailpipe emissions from new light-duty vehicles globally by 2035). Specific results considered by our Compensation Committee in 2021 in determining our NEOs' performance against strategic goals related to 'Our People' include the prioritization of our safety culture, diversity hiring, and engagement and inclusivity scores. Please see our [2022 Proxy Statement](#), particularly pages 61-65 for additional details.

B.1.3: Integration with enterprise risk management

GM's Strategic Risk Management (SRM) approach is centered on strong risk governance practices across functions. The SRM Team supports the business in identifying and prioritizing known risks, as well as emerging risks on the horizon. Risks are assessed and analyzed, using specialized techniques such as wargaming or premortem thinking, when appropriate, to build mitigation strategies.

A key component of GM's SRM approach is conducting a regular companywide risk assessment. The assessment includes external inputs such as research on trends, current events and market dynamics, as well as internal inputs from senior leaders across our business units. The assessment also considers risks across our value chain, including those upstream in our supply chain and downstream among dealers, consumers, communities and other stakeholders. This work results in an enterprise risk profile that is regularly reviewed with our senior leaders, as well as the Risk and Cybersecurity Committee of the Board. These reviews include changes to our risk landscape and ongoing risk management plans.

Our 2022 enterprise risk profile includes a set of key risk themes—such as workforce strategy, health and safety, and supply chain resiliency—that have human rights-related components. We measure progress against these risks on a quarterly basis and share updates with the Risk and Cybersecurity Committee of the Board.

B.1.4: Communication/ Dissemination of policy commitments

Our goal is to have our entire global workforce understand our commitments, including awareness of our Human Rights Policy and how to access it. To that end, together with our Internal Communications Team, we've developed a global communications strategy for our Human Rights Policy that leverages our internal company site (Socrates), our internal announcement and discussion platform (Yammer), our employee resource groups, leadership at each of our global plant locations and location-specific private Facebook pages as channels to reach as much of our global workforce as possible. The Human Rights Policy is available in the eight primary languages spoken across our global operating regions to promote ease of access and understanding.

We communicate policy commitments to suppliers through our [Supplier Code of Conduct](#), which is incorporated with our standard purchase order contracts. Importantly, the Code also incorporates by reference the ILO Core Conventions that are part of our Human Rights Policy. We require our suppliers to cascade similar expectations through their own supply chains. Policies are available to suppliers publicly as well as through the SupplyPower supplier portal. Updates to policies are communicated through SupplyPower supplier bulletins.

The publication of the Conflict Minerals and Responsible Minerals Sourcing Policies was communicated to suppliers via a SupplyPower Bulletin alerting Tier I suppliers of the new policies and highlighting major changes. The publication of the new Supplier Code of Conduct was communicated via a SupplyPower Bulletin as well as a Supplier Business Meeting.



B: Embedding respect and human rights due diligence

B.1.5: Training on human rights

Empowering the workforce about their own rights and those of all people is key to an effective human rights program. This includes training and capacity building for teams who implement our Human Rights Policy.

Training is a critical aspect of reinforcing our ethical culture because it educates our employees on how to apply the standards and principles set forth in our policies in their work activities. All global salaried employees are required to complete the Code of Conduct training each year, in addition to various other annual training modules based on their role and function and complete corporate required training (CRT). All CRT courses are available to global salaried employees in eight languages (including English). New and refreshed courses are deployed annually, and we use adaptive technology that tailors the courses to an individual's job responsibilities.

Trainings focused on health and safety, and diversity, equity and inclusion—all important issues addressed within our Human Rights and related policies—are significant components of the CRT. In 2022, we are working to expand the CRT to include additional content relating to human rights. Also in 2022, the Global Sustainability Strategies Team is working to deepen our internal partnerships and build capacity among employee teams in areas such as GPSC and labor relations through training and small group discussions on the UN Guiding Principles on Business and Human Rights.

GM is working with the Automotive Industry Action Group (AIAG), of which we are a member, to provide training to our employees and suppliers through their Supply Chain Sustainability eLearning platform. The training reflects the latest Automotive Industry Guiding Principles, which describe expectations for Business Ethics, Environment, and Human Rights and Working Conditions. Human rights training topics include child labor and young workers, wages and benefits, working hours, forced labor, freedom of association, health and safety, anti-harassment and nondiscrimination.

AIAG will update its current training to a more robust ESG eLearning platform that offers more comprehensive content and an interactive experience. The platform also will enable scenario-based learning that references specific challenges within the ESG space. As a sponsor company, GM is helping to finance the platform and looks forward to continuing to make it available free of charge to our suppliers. The updated eLearning platform is expected to roll out to our supply base in 2022.


2021 Ethics & Compliance Training By-the-Numbers

 **~364,000**
total online courses delivered

~6,000
in-person advanced compliance
training modules delivered

 **~64,000**
employees and select contractor
workers completed ethics and
compliance training

4
required courses
for employees

 **1**
customized
contract worker
course



B: Embedding respect and human rights due diligence

B.1.6: Monitoring and corrective actions

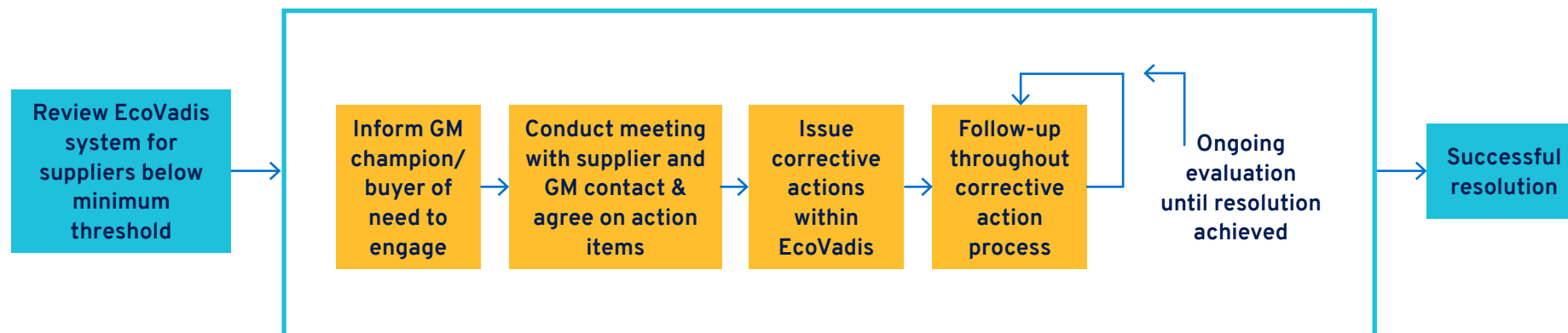
GM strives to work with ethical suppliers who share our values to reach our mutual ESG goals. We utilize several tools to monitor adherence to our Supplier Code of Conduct.

EcoVadis is a global sustainability ratings platform that has assessed over 90,000 companies on ESG performance. We use the platform to conduct individual ESG performance assessments of our suppliers based on labor, ethics, human rights and other dimensions. The EcoVadis assessment includes evaluation of a company's policies and practices related to numerous significant human rights-related issues, such as working conditions, child labor, forced labor, human trafficking, diversity, discrimination, harassment, health and safety, and social dialogue. As of April 2022, over 500 GM suppliers participate in the platform, including more than 300 Strategic Supplier Engagement suppliers who represent 83% of GPSC total spend. GM requests that suppliers participate in the EcoVadis platform in connection with its request for quotes.

The GPSC Compliance Team identifies suppliers below the minimum EcoVadis score that GM deems acceptable for Ethics and Labor and Human Rights categories. Low-scoring suppliers are contacted to implement corrective actions as shown in Figure 1.

Supply chain visibility is key to identifying and mitigating sustainability risk and impacts and achieving proactive avoidance. We utilize an in-house customized supply chain visibility tool that integrates with GM plants, Tier I suppliers, reported Tier II suppliers and logistics nodes. This tool is used to map geographic locations and relationships across the global GM supply chain. The tool also incorporates 24/7 monitoring and global incident mapping of supply chain disruptions and potential human rights issues, including those affecting members of our supply chain worldwide.

Figure 1: Ongoing Human Rights Risk Response





B: Embedding respect and human rights due diligence

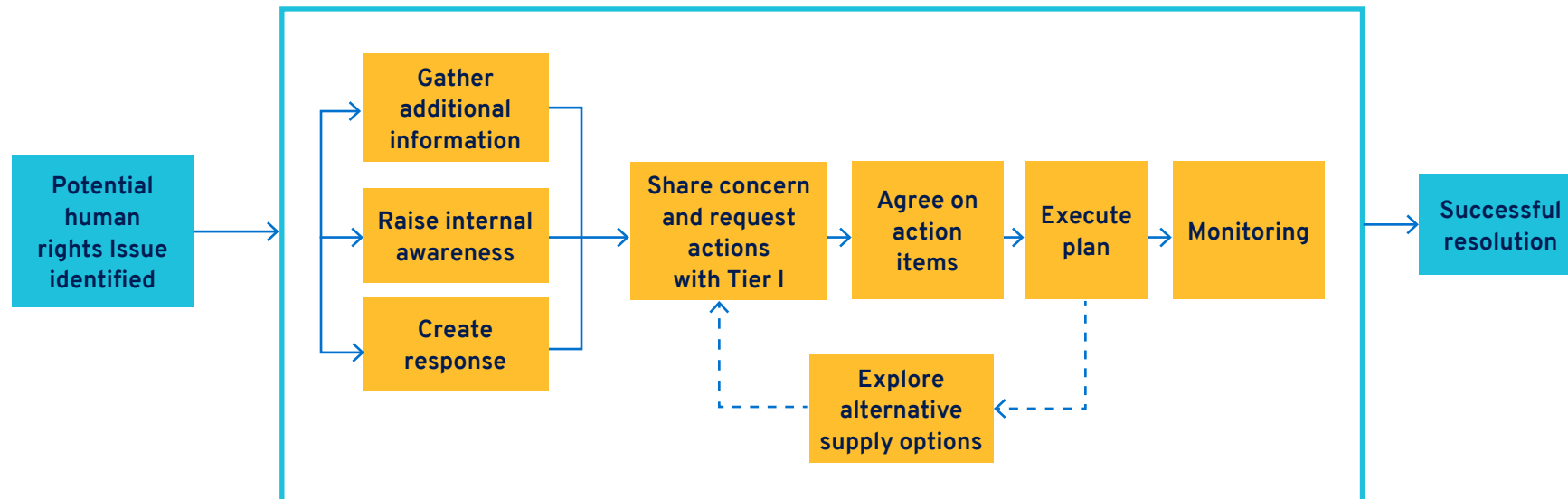
Through our monitoring process, GM may identify suppliers potentially involved in human rights incidents. If identified, GM's Supply Chain Risk Management Team notifies the appropriate GM global supply chain crisis response teams. These crisis teams are then able to work cross-functionally with Tier I suppliers and GM's functional purchasing, logistics and engineering teams to monitor. This collaboration enables GM to work quickly to identify potential human rights or sustainability risks.

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.

Figure 2: Potential Human Rights Risk Response Process





B: Embedding respect and human rights due diligence

GM conducts annual self-verification surveys of suppliers to validate their adherence to the Code and contractual obligations. Material noncompliance disclosed in surveys or otherwise identified is addressed directly with suppliers. In 2021, survey responses were collected from 3,900, over half of suppliers spanning production, logistics, customer care and after-sales support. The survey asks suppliers to confirm that they have:

- Upheld compliance with GM Terms and Conditions or other applicable provisions of purchase contracts related to compliance with laws, employment and ethical business practices.
- Engaged in company business practices consistent with GM's Supplier Code of Conduct or a similar code of conduct published by their company.
- Adopted their own code of conduct or similar document expressing a commitment to conducting business ethically, honestly and in compliance with all applicable laws.
- Shared GM's Supplier Code of Conduct or a similar code of conduct published by their company with their suppliers.
- Implemented a safety policy that is consistent with the principles set forth in GM's Supplier Code of Conduct.

Supplier responses to the survey are reviewed and, if required, are escalated to remediate risk and noncompliance.

GM has recently joined the Responsible Business Alliance (RBA) to strengthen our supply chain due diligence. The RBA offers risk assessment tools to further supplier human rights monitoring efforts. Utilizing these tools, we expect to identify high-risk suppliers to investigate risk factors, create corrective action plans and remediate risk. Suppliers in high-risk supply chains are evaluated through an on-site, third-party audit facilitated by the RBA. These audits include stakeholder engagement that will allow us to hear directly from front-line workers. Corrective action plans for nonconformance from the audit will be implemented and monitored until the risk is remediated. Remediation will include working with the supplier to resolve the nonconformance up to re-sourcing.



B: Embedding respect and human rights due diligence

B.1.7: Engaging and terminating business relationships

GM's commitment to respect human rights in our supply chain is aligned with our purchasing decisions. The GM Supplier Code of Conduct outlines requirements and expectations in areas related to human rights, environmental stewardship, responsible material sourcing and responsible and lawful business practices. When we become aware of violations or alleged violations of our Supplier Code of Conduct, we respond appropriately, up to and including the termination of business relationships.

Our responsible materials/conflict mineral "sourceability" rating is a tool used to incentivize the advancement of our supplier human rights programs, as well as other sustainability efforts. During the sourcing process, a green, yellow or red rating advises buyers on sourcing decisions. Notably, suppliers with a red overall sourceability rating may not be awarded new or extended contracts.

A supplier's overall score is comprised of several intermediate scores split into categories that include quality, service and responsible material/conflict mineral sourcing. A supplier's overall sourceability score is determined by taking the lowest of its intermediate scores. For example, a supplier with a single red intermediate rating, while all others are green, receives a red overall rating. As a result, responsible material sourcing could be the single determinant of whether we source from a given supplier.

Our supplier scorecards also include EcoVadis ESG scores for strategic suppliers, which are provided to buyers as information-only in order to help inform purchasing decisions.

B.1.8: Approach to engaging with affected stakeholders

Our success depends on relationships inside and outside of the company. This core value drives engagement with our stakeholders. We listen to and engage with them in a variety of ways, all with the goal of sharing information, building trust, informing business decisions and solving challenges through meaningful dialogue. Our commitment to stakeholder engagement is enshrined in our Human Rights Policy.

As an example, healthy union relationships are built on effective communication. Our Labor Relations Team is responsible for managing relationships with the labor unions that represent 99% of our global hourly workforce and 61% of our total global workforce. We engage with our union partners daily and provide opportunities for them to offer input into our processes. An ongoing priority is to ensure that our represented employees feel empowered as members of our global manufacturing and operations team and that their voices and ideas are heard on topics such as safety and quality improvement.

Similarly, in 2021 we engaged with representatives of Indigenous mining communities in several countries, including Australia and Canada. The Development Partnership Institute facilitated these dialogues, in which we heard concerns. In response, we are actively exploring opportunities to build relationships and communication channels with communities closer to the origin of our supply chains. Through the Global Platform for Sustainable Natural Rubber (GPSNR), for example, we are actively participating in working groups with smallholder farmers to better understand their perspectives and opinions.



B: Embedding respect and human rights due diligence

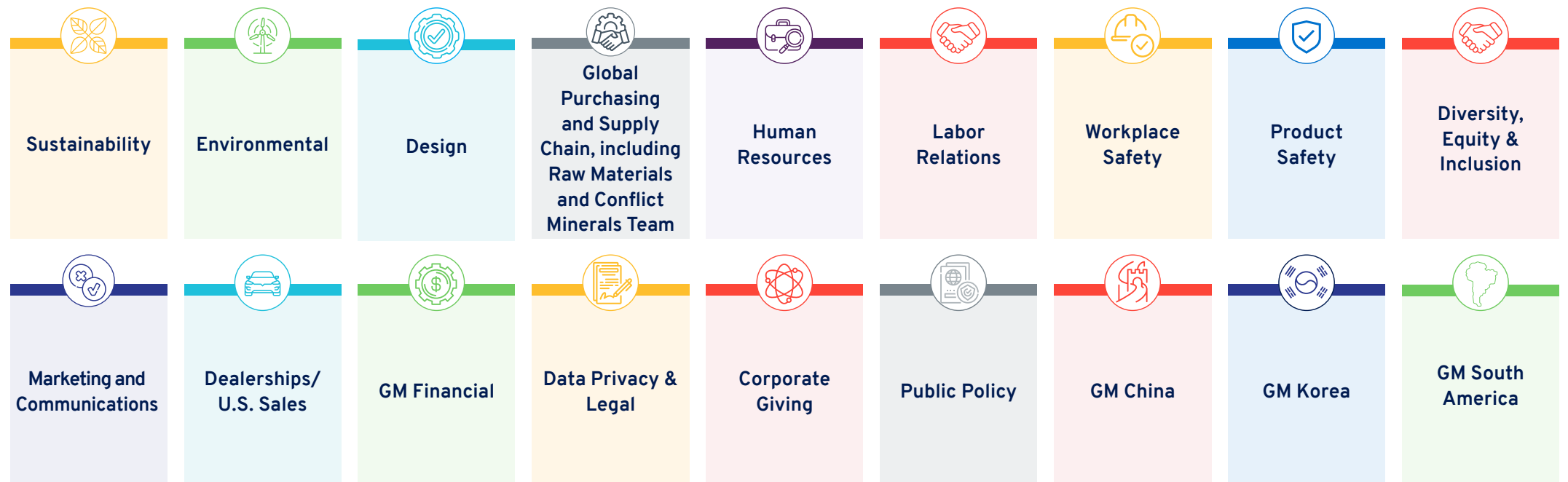
B.2.1, B.2.2 & B.2.3: Identifying, assessing, integrating and acting on human rights risks and impacts

To effectively prevent and mitigate potential impacts to people, the UN Guiding Principles on Business and Human Rights establishes a process, known as a saliency assessment, whereby potential impacts are identified and prioritized by severity and likelihood. Salient human rights issues for a company are those that are most at risk of severe impacts through a company’s activities and business relationships.

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.

In the workshops with a cross-functional working group, we looked at our value chain, considered potential impacts to people throughout our value chain and then considered the severity and likelihood of each impact. Through this process, the working group arrived at an initial set of prioritized potential impacts to consider. In 2022, GM will continue to refine and validate the potentially salient human rights impacts with internal and external stakeholders.

Figure 3: Representatives from each of these business units participated in the saliency assessment process





B: Embedding respect and human rights due diligence

While we recognize that nearly all of the potential impacts identified are by nature systemic, and not limited to GM or even the automotive industry, we take seriously our responsibility to work to identify, prevent, mitigate and remediate potential human rights impacts to which we may contribute, as detailed in our Human Rights Policy.

The results from our initial saliency assessment workshops are an important starting point on which we will build. We recognize that effective, regular stakeholder engagements are an important part of identifying and addressing potential human rights impacts. We view the saliency assessment process as an ongoing exercise with impacts and prioritizations that may, and likely will, change over time.

In addition, we recognize that we may not have direct control over the policies and practices of others upstream or downstream from GM operations. Yet, we do have influence that can be leveraged to encourage and drive meaningful action on human rights issues, particularly those that we consider to be salient.

As an example, we are a founding member of the GPSNR, where we seek to leverage our role as a significant end-user of natural rubber-containing products (tires) to transform the natural rubber value chain. Please see [page 32 of the 2021 GM Sustainability Report](#) for more details.

This responsibility also means that we actively monitor human rights issues, and when new challenges arise, we evaluate and take appropriate action. As an example, soon after Russia's invasion of Ukraine in 2022, GM suspended exports of vehicles and parts to Russia and our Russian sales company suspended sales of vehicles within Russia, going beyond the requirements of U.S. sanctions at the time. GM later took additional actions to extend the suspension of our Russian business. In addition, GM provided \$250,000 to the International Rescue Committee to help support the rapidly growing number of displaced civilians. GM also donated 50 new Tahoe vehicles to the Ukraine Ministry of Infrastructure to further civilian relief efforts, and employees joined together to donate over \$168,000, including a \$50,000 company match, to organizations including Nova Ukraine, World Central Kitchen and the International Rescue Committee.

For additional details on our systems to prevent and mitigate some of our salient human rights issues, please see the following sections:

- Child labor: D.5.4 and D.5.10
- Forced labor: D.5.5 and D.5.10
- Freedom of association and collective bargaining: D.5.6
- Health and safety: D.5.7
- Gender-based discrimination: D.5.8
- Grievance mechanism (Awareline): Section C



B: Embedding respect and human rights due diligence

Figure 4: Potential Salient Human Rights Impacts



	Workplace	Supply Chain	Customers and Communities
Barriers to inclusion			
Child labor			
Cybersecurity, data and privacy			
Discrimination			
Environmental impacts			
Forced labor			
Freedom of association			
Health and safety impacts			
Livelihoods and wages			
Mobility equity			
Working conditions			



B: Embedding respect and human rights due diligence

B.2.4: Tracking the effectiveness of actions to respond to human rights risks and impacts

GM has already deployed several systems for monitoring and evaluation purposes. To track workforce perceptions of inclusivity, we use our global Workplace of Choice survey, which goes to all employees. The full survey is conducted every two years in addition to shorter pulse surveys throughout the year. In 2021, for instance, over 75,000 global salaried and represented employees provided feedback.

GM uses a comprehensive Workplace Safety System, which includes a global safety data management system that is used to report, collect and analyze safety information. This data provides us meaningful information to develop risk mitigation plans that address issues, like hazards, with the most repetitive exposure, the most repetitive type of injuries, and the most repetitive gaps detected during safety tours. For more information, please see [pages 60-61 of the 2021 Sustainability Report](#).

GM makes use of a global third-party certified ISO:14001 enterprise program to manage and monitor potential environmental impacts. For additional details, please see [page 112 of the 2021 Sustainability Report](#). In addition, GM leverages the Manufacturing Excellence Indexes (MEI) system. MEI is an internal GM scoring tool to benchmark GM operations performance against internal facilities. The use of real-time data provides the organization a strategic and common method to measure performance, assess risk and drive continuous improvement.

In addition to these various tools used to monitor potential impacts across our own operations, GM uses EcoVadis, as detailed throughout this disclosure, to monitor and evaluate suppliers. With this platform, we seek to understand both individual performance and progress as well as broader, cross-supplier trends.

B.2.5: Communicating on human rights impacts

Please see section B.1.8 for details and examples of when and how we communicate with potentially affected stakeholders regarding human rights-related concerns.

Global automotive supply chains are large, highly complicated and have a long history of opacity, with information on suppliers and sourcing regions frequently considered trade secrets and closely guarded for competitive reasons. As a result, communication with individuals who work multiple tiers upstream within our supply chain is difficult.

We want to hear from these workers and believe that, in some cases, they may want to report grievances and share their experiences and perspectives with us. Multiple tiers of supplier companies in between, however, are not always interested in facilitating or sharing information to make such communication possible.

Among the ways we address this challenge are:

1. Strengthening the expectation in our Supplier Code of Conduct that suppliers share information about how to access our Awareline with their workers or establish their own grievance mechanism, and to cascade this expectation to their own suppliers.
2. Joining multistakeholder initiatives similar to the GPSNR and working with convening organizations such as the Development Partnership Institute (see B.1.8 for more details).
3. Participating in the RBA's Worker Voice Platform.
4. Investing in supply chain traceability and transparency solutions to gain greater visibility into our supply chains.



C. Remedies and grievance mechanisms

C.1, C.2 & C.3: Tracking the effectiveness of actions to respond to human rights risks and impacts; design and user involvement

GM has a robust process for reporting incidents involving possible wrongdoing—including concerns related to human rights—violations of our Code of Conduct, IT or other cybersecurity events, personal information incidents, fraud, abuse or other concerns. Our primary grievance mechanism, the [Awareline](#), is operated by an independent third party and allows employees, suppliers and others to confidentially report concerns of misconduct by the company and its suppliers, and their respective management, supervisors, employees or agents. Reports can be made in more than a dozen languages, 24 hours per day, seven days per week, by phone, web or email. Reports may be made anonymously, where permitted by law. The Awareline is accessible to everyone and can also be used by our suppliers' stakeholders or any external individual to raise complaints or concerns about our suppliers.

The Awareline was started in the early 1990s as a mechanism for employees and others to report concerns of possible wrongdoing and actions believed to be contrary to corporate policy. A contracted third-party service provider has been used from the beginning to manage its operations, and a cross-functional leadership team was involved in its initial development and in ongoing oversight. The Awareline is managed by the Global Ethics and Compliance Center (GECC) and oversight of the ethics and compliance program, including the Awareline, rests with the Audit Committee of the Board.

For additional details on our Awareline, please see [pages 110-116 of the GM 2021 Sustainability Report](#).

In addition to the Awareline, we have a separate dedicated reporting program focused on safety, “Speak Up For Safety”. The program is designed to give employees, customers, suppliers and dealers an easy, consistent and unfiltered way to report potential vehicle safety issues and suggest improvements. Concerns can be submitted through a toll-free phone number, a smartphone app, email or the [Speak Up For Safety website](#). If they feel comfortable doing so, employees also can report concerns to their managers, who are trained to respond or escalate as appropriate.

In addition, GM has an Employee Safety Concern Process, as described on [page 60 of the 2021 Sustainability Report](#), for preventing and managing workplace safety risks.

Finally, through our membership in the RBA, we will have access to RBA Voices. This platform helps members and their suppliers improve conditions in their international supply chains by giving workers more ways to provide feedback and learn important professional and personal skills, while providing companies with greater visibility into facilities. RBA Voices includes a worker survey tool, audit support, a mobile learning app and a grievance reporting mechanism.



C. Remedies and grievance mechanisms

C.4: Procedures related to the grievance mechanism

A thoughtful and well-documented process helps to ensure that our Awareline program is applied consistently and effectively.

Individuals enter reports directly on the Awareline and Issue Management System (AIMS) secure server to minimize the risk of unauthorized disclosure. AIMS makes these reports available to trained individuals within GM who are charged with evaluating and where appropriate, investigating the report, based on the type of violation and location of the incident. When an individual files a report through the AIMS website or call center, they receive a unique username and are asked to choose a password. They can return to the AIMS system again either through the website or a phone call to access the original report and add more detail or answer questions posed by a company representative to help resolve open issues. Where permitted by law, the system allows GM to follow up with individuals who submit Awareline reports anonymously, while preserving the reporter's anonymity. This process enables GM to better investigate and remediate anonymous allegations through an "anonymous dialogue," where situations are identified, investigated and addressed.

Allegations of misconduct are reviewed and prioritized based on a number of factors, including the type of misconduct, the position of the alleged wrongdoer within the company and whether the allegation entails any potential violations of law. High-priority cases receive special scrutiny and review; a cross-functional committee meets monthly to discuss their investigative progress and resolution. There is also a quarterly review process to determine which cases, if any, require reporting to the Board or Audit Committee, as well as processes in case a particular allegation requires more immediate reporting. The chief compliance officer also provides regular updates to the Audit Committee on key GM GECC priorities and accomplishments and trends in Awareline submissions and investigations.

The timeline for addressing complaints, informing the complainant and communicating potential outcomes is determined on a case-by-case basis, depending on the nature of the allegation and evidence available. Our process requires contact with the complainant at the outset and conclusion of the investigation.

For concerns reported to the Speak Up For Safety Program, our dedicated safety team funnels concerns to the appropriate departments where they are evaluated, addressed and, where necessary, escalated. By building a culture of safety, we attempt to find issues sooner and reduce the number of impacted vehicles.



C. Remedies and grievance mechanisms

C.5: Prohibition of retaliation for raising complaints or concerns

Speak Up!, GM's Non-Retaliation Policy, protects GM employees from retaliation when they raise a concern in good faith. GM's most recent Ethical Culture Survey, as well as industry benchmarking data, shows that the majority of misconduct reports are made to an employee's manager. To help our GM managers in such circumstances and to provide additional guidance regarding GM's Non-Retaliation Policy, GECC has developed a website that provides helpful compliance tools for managers, including compliance toolkits on various topics, compliance moments to use at meetings, quick reference compliance guides and other materials. GM also makes available a scenario-based "What Would You Do?" course for managers.

In 2021, the GECC developed and is piloting a post-investigation antiretaliation survey to initiate outreach to a sampling of reporters following an investigation to identify and respond to potential retaliation and improve the investigative process. These materials help GM managers create a safe and open reporting environment for their teams.

In addition, the Awareline program has built-in processes to further minimize the risk of retaliation to users, such as the ability to report anonymously, as described in C.4 above.

C.7: Remedying adverse impacts

We take seriously our responsibility to identify, prevent, mitigate and remediate human rights-related risks and impacts that we may cause or to which we may contribute. When we discover potential adverse human rights impacts, we will investigate, and where appropriate, we will engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their remediation through legitimate processes described in sections C.1, C.2, C.3 and C.4.

At a higher level, climate change affects different communities in different ways. As we move toward a carbon neutral future, we aspire to lead positive change and implement inclusive solutions that address everyone's unique needs, especially those of the communities where we live and work. In 2021, we put forth a Climate Action Framework to help guide our actions as our industry and company undergo a fundamental shift in mobility. While the Climate Equity Fund is not a response to any specific adverse impact caused by GM, it is intended to help remedy impact that climate change could have on vulnerable communities. In 2021, GM's Climate Equity Fund supported 19 nonprofit organizations that are implementing inclusive mobility solutions for a zero-emissions, carbon neutral future.

C. Remedies and grievance mechanisms

C.8: Communication on the effectiveness of grievance mechanisms and incorporating lessons learned

Maximizing effectiveness is a function of continuous improvement. Our grievance mechanisms become stronger through modifications to administrative and investigative processes that enhance program efficiency and effectiveness based on regular reviews by internal control functions and GM management.

In 2021, GM received 4,170 reports to the Awareline, of which 3,048 were classified as allegations, and the remaining were suggestions, inquiries or other miscellaneous issues. GM tracks all reports of misconduct— whether made to the Awareline or through some other channel—in a case management system that facilitates efficient investigation, follow-up and compliance trend analysis.

Table 1: Breakdown of Awareline reports received by category, 2021

2021 Types of Allegations Received

CATEGORY OF ALLEGATIONS	PROPORTION OF ALLEGATIONS
Accounting, Auditing and Financial Reporting Fraud relating to accounting procedures, internal controls or auditing matters	0.1%
Business Integrity Examples: Fraud, conflicts of interest, corruption	5.6%
Human Resources, Diversity and Workplace Respect Examples: Interpersonal conflicts, harassment, discrimination, retaliation	66.8%
Environment, Health and Safety Examples: Threats and violence, substance abuse, environmental concerns, workplace safety	13.3%
Misuse, Misappropriation of Corporate Assets Examples: Theft, property damage, information or IP loss, computer misuse	14.2%





D: Performance: Company human rights practices

D.5.1.a: Living wage (own operations)

GM pays fair and competitive wages and provides benefits that meet or exceed applicable legal requirements.

D.5.1.b: Living wage (supply chain)

GM expects suppliers to provide fair compensation and benefits that meet or exceed applicable legal requirements. These expectations are outlined in our [Supplier Code of Conduct](#).

We work with our suppliers to support the payment of a fair wage by conducting due diligence to identify, prevent, mitigate and remediate human rights-related risks and impacts and to provide training, which covers the topic of wages, free of charge, through AIAG.

D.5.2: Aligning purchasing decisions with human rights

GM strives to pay suppliers on time and communicate supply demand changes for suppliers to adjust production accordingly.

We have processes in place so that suppliers are paid in a timely manner in accordance with agreed upon terms. Suppliers are paid automatically a specified number of days after parts have been received at the planned shipping location or plant. The standard number of days for payment is specified in GM's terms and conditions unless the parties agree otherwise. If a different length of time is agreed upon, the timeframe is reflected in the applicable contract. If the automated system fails or if parts are shipped to the incorrect address and cannot be correctly received to trigger payment, a supplier can contact GM's Global Business Services help desk. The help desk will create a claim for payment so that the supplier can be paid in full for parts once the issue is resolved and parts are delivered.

Material short-term shipping schedules are posted initially in GM's Electronic Data Interchange and within the manufacturing long-term schedule. These notifications indicate when materials are needed and the quantities required. We announce any changes in shipping disruptions through a supplier bulletin. Larger disruptions are communicated through frequent Supplier Business Meetings (SBMs) between supplier representatives and GM supply chain management. These SBMs provide increased transparency and context when disruptions occur with minimal lead time. Providing multiple notifications in different ways helps ensure suppliers have knowledge of schedule changes as soon as possible so that they can adjust shipment and production schedules accordingly.



D: Performance: Company human rights practices

D.5.3: Mapping and disclosing the supply chain

We utilize an in-house customized supply chain visibility tool that integrates with GM plants, Tier I suppliers, reported Tier II suppliers and logistics nodes. This tool gives our organization the capability to map geographic locations and relationships across the global GM supply chain. The tool also incorporates 24/7 monitoring and global incident mapping of supply chain disruptions and potential human rights issues, including those affecting members of our supply chain worldwide.

Supply chain monitoring also:

- Uses innovative tools and real-time data analysis to monitor catastrophic events (e.g., earthquake, hurricane) and isolated disruptions (e.g., factory fire, labor strike).
- Reports all potential impacts to a regional command center.
- Receives information on suppliers and supply chain tiers through third-party services.
- Factors risk scores into sourcing process.
- Develops mitigation plans for high-risk areas.

Through our monitoring process, GM may identify suppliers potentially involved in human rights events. If identified, GM's Supply Chain Risk Management Team notifies the appropriate GM global supply chain crisis response teams. These crisis teams are then able to work cross-functionally with Tier I suppliers and GM's functional purchasing, logistics and engineering teams to respond. This collaboration enables GM to work toward mitigating identified human rights risks.

Additional ways we monitor and manage supply chain risks include:

- Senior leadership review at least four times per year
- Risk Advisory Council
- Annual global risk assessment
- Cross-functional meetings
- Quarterly risk dashboard updates
- Senior Leadership Team interviews
- Board Risk and Cybersecurity Committee
- Annual CEO business unit reviews

D.5.4.a: Prohibition of child labor (own operations)

GM has a zero-tolerance policy regarding the employment of children where the age of employment is not in accordance with applicable law.

GM takes affirmative steps to avoid unlawfully hiring underage workers. For example, in the United States and Canada, applicants for hourly roles are asked to verify on their employment applications that they are at least 18 years old.

While we want to protect young people from exploitative and unlawful work, we also want to provide enriching learning and development opportunities where doing so is consistent with applicable law. That is why we offer some co-op and internship programs that may bring on high school and college students. We strive to equip them with skills, help them gain experience and unlock their professional potential.



D: Performance: Company human rights practices

D.5.4.b: Prohibition of child labor (supply chain)

GM has a zero-tolerance policy regarding child labor in our supply chain, which is reflected in our [Supplier Code of Conduct](#). Suppliers are required to implement an appropriate mechanism to verify the age of workers and applicants to ensure compliance with the [ILO requirements](#) for minimum age for employment and provide remediation programs for workers not meeting age requirements.

We work with our suppliers to enable them to responsibly manage human rights. In the event of nonconformance with our Supplier Code of Conduct, we work with our suppliers through training and direct engagement to enable them to responsibly manage human rights, including child labor.

D.5.5.a, D.5.5.c, D.5.5.e: Prohibition of forced labor (own operations)

GM is committed to respecting the rights of people everywhere not to be subject to forced labor. There are multiple dimensions to forced labor and ways in which coercion can occur. These include:

- Requiring workers to pay recruitment fees, typically to labor brokers, which can result in debt bondage.
- Refusing to pay workers in accordance with applicable law or otherwise paying them less than they are owed or not paying them on time.
- Imposing restrictions on the free physical movement of workers aside from any non-compete or similar agreements.

GM does not engage in or condone, explicitly or implicitly, any of these practices.

All suppliers and contractors, including recruiters, are required to adhere to our Human Rights Policy and Supplier Code of Conduct. If nonconformance is discovered in which supplier applicants have been required to pay for hiring, we would address it promptly as described previously in Figure 2.

GM makes every effort to pay all workers, salaried and hourly, on time and in full, and to provide employees with documentation explaining their wages, such as a pay slip that accounts for any and all deductions. Our payroll team makes use of computer-based software to manage payments to our approximately 146,000 global employees. The software allows us to generate and review monthly reports to verify the proper payment of our workforce and to address pay discrepancies promptly. We do not use labor brokers or other similar intermediaries to distribute payments. Instead, we pay employees directly using verified third-party payment software.

GM does not impose restrictions on the free physical movement of our workforce. We do not retain our employees' original personal identification documents. In some instances, to comply with applicable laws, we may retain copies of employees' identification documents, but do not retain the original documents. We also do not require workers to use any specific living quarters or accommodations, company-provided or otherwise.



D: Performance: Company human rights practices

D.5.5.b, D.5.5.d, D.5.5.f: Prohibition of forced labor (supply chain)

GM prohibits forced labor in our supply chain. Our [Supplier Code of Conduct](#) outlines expectations for suppliers that all work must be voluntary and that workers shall be free to leave work at any time or terminate their employment without penalty (aside from any noncompete or similar agreements). This Code forbids suppliers or third parties from imposing financial burdens on job seekers and workers by collecting recruitment fees or related costs. Suppliers are required to pay workers directly, in full and on time, and to not restrict workers' freedom of movement through the retention of bank payment cards, passports, identification cards and work authorization documents or similar arrangements for accessing wages or other measures.

We work with suppliers, as appropriate, to mitigate risk by providing AIAG eLearning modules focused on forced labor and wages. We also engage with high-risk suppliers who have been identified through our monitoring tools to adopt a risk management plan.

D.5.6.a: Freedom of association and collective bargaining (own operations)

GM respects the rights of people everywhere to associate freely and to bargain collectively. We work with about 28 unions globally, representing approximately 99% of our represented workforce, or 61% of our total global workforce, who are covered by collective bargaining agreements.

As described in our [Code of Conduct](#), [Integrity Policy](#), [Human Rights Policy](#), [Anti-Harassment Policy](#) and [Non-Retaliation Policy](#), GM prohibits retaliation, intimidation, harassment and violence in the workplace. These prohibitions and protections extend to those interested in joining or forming a union.

D.5.6.b: Freedom of association and collective bargaining (supply chain)

As with our own employees and reflected in our Supplier Code of Conduct, we support and respect the rights of all suppliers and their employees to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly in alignment with applicable laws. We also respect the right of workers to refrain from such activities, in accordance with applicable laws. We require suppliers to permit workers and/or their representatives to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, abuse or harassment; and we require that suppliers prohibit intimidation and harassment against union members and union representatives.

We work with suppliers, as appropriate, to mitigate risk by providing AIAG eLearning modules focused on freedom of association and collective bargaining. We also engage with high-risk suppliers who have been identified through our monitoring tools to adopt a risk management plan.

D.5.7.a: Health and safety (own operations)

Our workplace safety vision is to "Live values that return people home safely. Every person. Every site. Every day." This vision is guided by our safety policy, which applies to all employees and others working at our sites, including consultants, agents, sales representatives, distributors, independent contractors, third-party suppliers who work on GM premises and contract workers when performing work for GM. For details concerning our approach to managing the health and safety of employees in our operations, including key metrics and key performance indicators, please see the [2021 GM Sustainability Report, pages 75-76](#).



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D.5.7.b: Health and safety (supply chain)

GM's [Supplier Code of Conduct](#) requires suppliers to provide employees with clean, healthy and safe work environments that meet or exceed legal standards. We utilize the EcoVadis platform to help assess labor, health and safety, management systems and ethics issues among participating Tier I suppliers.

To build supplier capacity and assist with the development of effective health and safety programs, we share our own best practices and learnings with suppliers to implement in their own operations. During the past year, for example, we shared, through SBMs and our supplier portal, best practices associated with our health and safety programs, including our COVID-19 Safe Work and Return to Work Playbooks. AIAG also provides eLearning modules that include health and safety training.

D.5.8.a: Women's rights (own operations)

GM has long been a global leader in advocating for women's equity in the workplace. In 2021, women held 31.9% of our top management positions within two levels of the CEO. Equileap and the Bloomberg Gender-Equality Index are among the organizations that have recognized GM as a leader in gender equity in the corporate sector.

As described in our [Code of Conduct](#), [Integrity Policy](#), [Human Rights Policy](#), [Anti-Harassment Policy](#) and [Non-Retaliation Policy](#), GM prohibits unlawful discrimination and harassment based on protected characteristics, including gender, and prohibits retaliation, intimidation, harassment and violence in the workplace. Allegations of behavior inconsistent with these policies, including allegations of inappropriate acts targeting women, reported through our various reporting mechanisms or otherwise, are investigated and addressed accordingly. Employees determined to have engaged in such behaviors are subject to discipline, up to and including termination of employment. Similarly, local and national contract agreements with our union partners prohibit unlawful discrimination, harassment, intimidation and violence based on protected characteristics including gender.

In addition, we recognize that there may be different work expectations and impacts that are linked to gender-related issues, including accommodations for parental leave, fertility treatments, adoption and surrogacy among others. Many of our employee benefits seek to address such issues. Please see more details about these benefits on [pages 73-74 of the 2021 GM Sustainability Report](#).

We are committed to equal pay practices. Our commitment to the Equal Pay Pledge reflects the value we place on pay equity and our shared belief that employees' protected characteristics should not factor into compensation decisions. As part of this commitment, GM has a rigorous annual process that measures pay equity and makes adjustments whenever unaccounted-for discrepancies are found.



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D.5.8.b: Women's rights (supply chain)

We recognize the potential risk of gender-based discrimination and violence in supply chains. Our [Supplier Code of Conduct](#) outlines expectations for a workplace free of harassment and discrimination. The Code also expects equal pay for equal work, equal opportunities throughout all levels of employment and the elimination of health and safety concerns that are particularly prevalent among women workers.

EcoVadis rates our enrolled suppliers in a program that tracks their percentage of women workers as well as their health and safety programs. RBA audits include the element of removing pregnant women and nursing mothers from working conditions with high hazards, to minimize any workplace health and safety risks to pregnant women and nursing mothers and to provide reasonable accommodations for nursing mothers.

D.5.9.a: Working hours (own operations)

GM follows all applicable laws and regulations regarding working hours.

D.5.9.b: Working hours (supply chain)

GM's [Supplier Code of Conduct](#) states that suppliers must comply with local laws and collective bargaining agreements, where applicable, regarding working hours. Working hours must not exceed the maximum set by local law.

We work with suppliers, as appropriate, to mitigate risk by providing AIAG eLearning modules focused on working hours and conditions. Please reference section B.1.5 (Training on Human Rights) for more details.

D.5.10: Responsible sourcing of minerals

Many of the advanced technologies in our portfolio may use minerals and materials that are potentially mined in conflict-affected and high-risk areas. GM understands the inherent risks of sourcing raw materials, including minerals. Top management strongly supports supply chain due diligence for conflict minerals and expansion to other minerals. A compliance committee comprised of cross-functional GM leaders and an executive steering committee provide leadership and direction for the program.

We identify and mitigate human rights risks through due diligence as part of our Responsible Minerals Sourcing Program. This program is directly aligned with the [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#), including current supplements on tin, tantalum, tungsten and gold (3TG), and GM's own [Conflict Minerals](#) and [Responsible Minerals Sourcing](#) policies.

We expect suppliers to conduct due diligence in accordance with the OECD Guidance and disclose conflict minerals, 3TG, in their products and corresponding smelters and refiners utilizing the Conflict Minerals Reporting Template (CMRT) published by the Responsible Minerals Initiative (RMI). In 2021, we received responses from 94% of the 2,602 supplier locations that were considered in-scope for GM's Conflict Minerals Program.



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To identify and remediate risks of significant adverse impacts that may be associated with extracting, trading, handling and exporting minerals globally, and especially from conflict-affected and high-risk areas identified in OECD Annex 2 and our saliency assessment, in-scope suppliers must disclose to GM, as necessary, updated smelter/refiner information for any 3TG mineral used in the production of its parts, materials, components and products.

Third-party cobalt and mica mining activities in certain regions of the world have been associated with potential human rights violations. To help mitigate this risk, in the past two years we have requested all Tier I direct vehicle component suppliers with cobalt product content to complete the Cobalt Reporting Template, the Mica Reporting Template and the CMRT to help us map the supply chain for components containing these minerals. These templates are key to identifying smelters or refiners (SORs) in our supply chain and developing a reasonable country of inquiry for the origin of the materials in our products.

After SORs are identified, they are validated to determine whether they have passed the Responsible Minerals Assurance Process (RMAP). This process, administered through the RMI, employs a risk-based approach to validate SORs' processes in place for responsible mineral procurement. Those SORs that have passed this assessment are considered conformant to the RMAP. The presence of nonconformant SORs will negatively affect a supplier's "sourceability" score as detailed in section B.1.7 of this disclosure.

We engage with our suppliers to assist them in building capabilities to improve chain of custody declarations and to increase the transparency of 3TG in our global supply chain. We communicate our conflict minerals reporting requirements to suppliers through various channels, including teleconferences, emails, publications and webinars, as well as providing direct feedback to improve reporting template detail and encourage smelter or refiner RMAP conformance.

Responses to feedback are required and, if not received, will impact the supplier's sourcing scorecard. We also have established a [direct email address](#) to provide our suppliers a streamlined path of communication relating to conflict minerals. We make conflict minerals documents available through our supplier portal and provide FAQs, instructions to help complete the CMRT, Conflict Mineral Application and other documents, webinar presentations and leadership messages relating to conflict minerals.

There is a formal escalation process for resolving concerns regarding the use of 3TG in our supply chain. Specifically, when our Conflict Minerals Team identifies defects, inconsistencies or other problems in a supplier's CMRT response, including a failure to respond, we first attempt to work directly with the supplier to resolve the issue. If our Conflict Minerals Team does not receive an acceptable response from the supplier, the issue is escalated to the appropriate level of GM leadership, and eventually to the Conflict Minerals Executive Steering Committee. If necessary, we may preclude a supplier from receiving future business if the concern is not resolved.

We aim to work with suppliers through the tiers of our supply chain to identify nonconformance with our policies and Code of Conduct to build capacity and remedy nonconformance. If we cannot find an avenue to mitigate the risk, we will then reevaluate the business relationship.

We work with our suppliers regularly to provide education and awareness, including training, webinars and supplier bulletins. We are active in AIAG Responsible Materials Work Group, which works on common automotive industry solutions with other OEMs and suppliers regarding conflict minerals and high-risk materials. In 2021, we joined the [Initiative for Responsible Mining Assurance](#), a third-party certification of industrial mine sites for mined materials and the [RCS Global Better Mining Initiative](#) for third-party certification of small and artisanal mines.



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We are an active participant within the RMI and corresponding RMI working subgroups. The Smelter Engagement Team is one of these subgroups that enables us to have direct SOR engagement. We have found that coordinated outreach to nonconformant SORs can be effective at encouraging RMAP participation. Likewise, GM has participated in RMI-sponsored SOR RMAP pre-audit visits, with the most recent visit being in 2019 with a gold refiner in India. If SORs have not been validated as conformant to the RMAP, we encourage them to participate in this third-party assessment. GM sent communications to 10 3TG SORs during the 2021 calendar year to utilize leverage to encourage participation in the RMAP. Due to COVID-19 concerns and restrictions, GM did not conduct on-site SOR visits in 2020 or 2021.

In addition, we act as a single point of contact on behalf of RMI for several cobalt refiners, assisting them in their efforts toward RMAP conformance. We also encourage suppliers to send outreach letters to nonconformant smelters/refiners in their smelter lists. Results of our monitoring and outreach efforts are reported to the Conflict Minerals Executive Steering Committee.

Through our [2021 Conflict Minerals Report](#) submission, we have identified and listed 3TG smelters and refiners in our supply chain and disclosed their RMAP status in that report's appendix.

D.5.11: Responsible sourcing of materials

GM understands that supply chain risks apply to minerals and materials outside the scope of Conflict Minerals. Our Supplier Code of Conduct reflects this and requires due diligence for sourcing certain raw materials. GPSC's Ethical Sourcing Team has further identified farms, ranches, mines and transient labor as areas that are inherent to the general automotive supply chain and that are considered high-risk for human rights and sustainability impacts.

The sourcing of natural rubber is an example of how we address certain risks and impacts within our supply chain. Recognizing the importance of taking action to limit the social and environmental impacts from natural rubber production, GM became the first automaker to commit to sustainable natural rubber in 2017, and in 2018 became a founding member of the Global Platform for Sustainable Natural Rubber (GPSNR). GPSNR is an international, multistakeholder organization with a mission to lead improvements in the socioeconomic and environmental performance of the natural rubber value chain. The initiative now has more than 100 members, including OEMs; tire manufacturers; rubber producers, processors and traders; nongovernmental organizations; and smallholder farmers, many of whom also held a collaborative role in the group's creation.

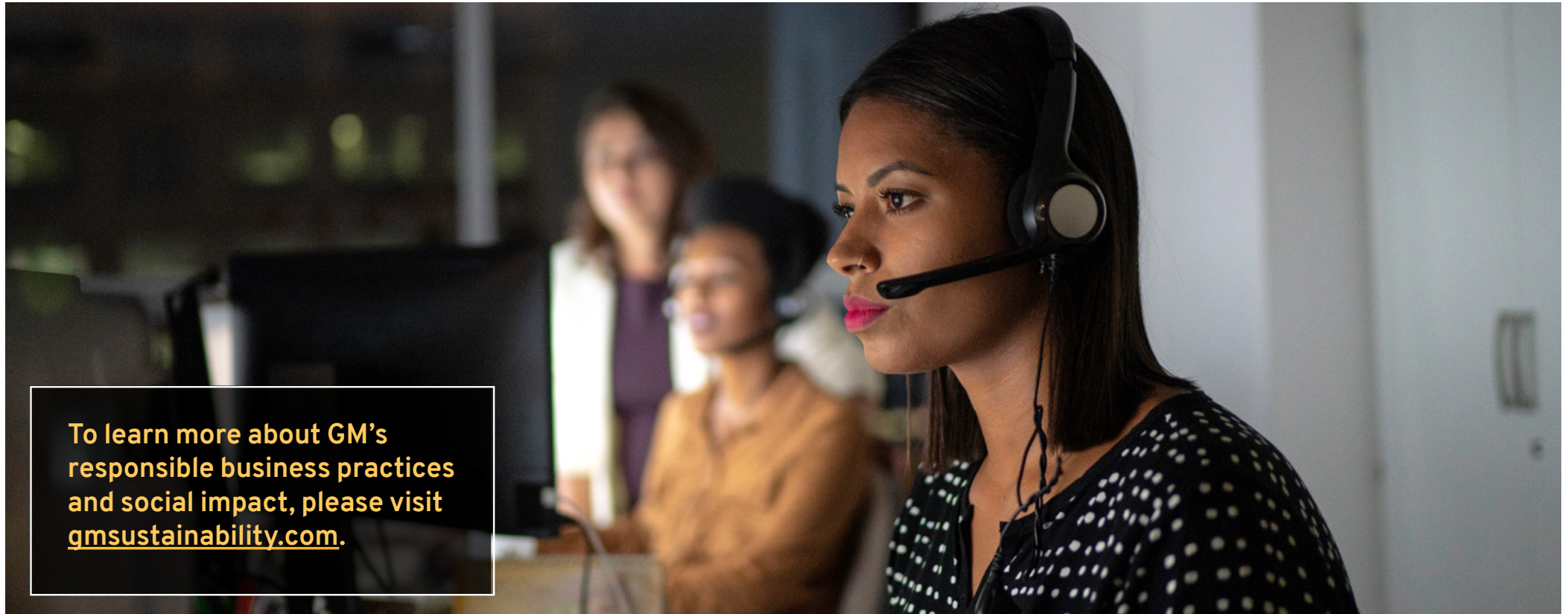
GM currently sits on GPSNR's Executive Committee with representatives from suppliers, civil society organizations and smallholder producers. GM also actively participates in the Policy Toolbox Working Group, through which we work with NGOs and suppliers on crafting specific policy commitments and disclosures that company members are expected to adopt.

One of the group's most significant accomplishments was to create a members' [sustainability policy framework](#) two years ago. All members are expected to adhere to this framework, which covers economic, social and environmental aspects of sustainability and is designed to help protect ecological health, local livelihoods and fundamental human rights. In 2022, GM also published our own [Sustainable Natural Rubber Policy](#). GPSNR also offers a grievance mechanism for stakeholders to express concerns about GPSNR members, resolve disputes and provide a remedy to impacted parties.



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Additionally, in 2018, members of GPSC supplier quality, product development and sustainability teams joined other corporate partners from the tire industry and NGOs to trace the value chain in Southeast Asia from a tire manufacturing plant back to rubber processors, dealers and plantations. The team studied the upstream operations to further understand the process of supplying natural rubber and met some of the farmers who make up the more than 84,000 natural rubber farms. This firsthand understanding of where and how tires are produced instills greater focus on ensuring ethical business practices are followed in our supply chain and in the industry.





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