

# GENERAL MOTORS

## Global Environmental Policy

### I. Purpose

General Motors (GM) Company is proud of its long-standing commitment to protect human health and the environment. As a responsible corporate citizen, we continually assess the Environmental impacts of our activities, products and services as a basis for our Global Environmental Policy and are committed to reducing or eliminating wherever practicable these impacts through the establishment of appropriate objectives and targets. This policy establishes a globally consistent standard intended to protect the environment by establishing sound practices that support compliance while minimizing negative environmental impacts.

### II. Principles and Values

The foundation of this policy is a set of core principles and values that have been in place for more than 20 years.

*Environmental Principles* – As a responsible corporate citizen, GM is dedicated to protecting human health, natural resources and the global environment. This dedication reaches further than compliance with the law to encompass the integration of sound environmental practices into our business decisions. The following Environmental Principles provide guidance to GM personnel worldwide in the conduct of their daily business practices.

1. We are committed to actions to restore and preserve the environment.
2. We are committed to reducing waste and pollutants, conserving resources and recycling materials at every stage of the product life cycle.
3. We will continue to participate actively in educating the public regarding environmental conservation.
4. We will continue to pursue vigorously the development and implementation of technologies for minimizing pollutant emissions.
5. We will continue to work with all government entities for the development of technically sound and financially responsible environmental laws and regulations.
6. We will continually assess the impact of our plants and products on the environment and the communities in which we live and operate with a goal of continuous improvement.

*United Nations Global Compact* – In 2015, GM joined the United Nations Global Compact, which endorses a framework of principles in the areas of human rights, labor, the environment, and anti-corruption. GM's commitment supports the Global Compact's ten principles and the company's intent to maintain the principles and to evaluate related global best practices that may be applicable to GM. Of these ten principles, Environment is specifically tied to Principles 7, 8 and 9, which state:

- Principle 7 - Businesses should support a precautionary approach to environmental challenges.
- Principle 8 - Businesses should undertake initiatives to promote greater environmental responsibility.
- Principle 9 - Businesses should encourage the development and diffusion of environmentally friendly technologies.

### III. Policy Owner, Policy Contact, Policy Interpretation

The Executive Director, Global Regulatory Affairs, Environment, Energy, and Safety Policy or his/her designee is the owner of this policy and is responsible for policy interpretations. The policy contact is the Manager, Environmental Compliance Oversight.

### IV. Applicability

This policy applies globally to all GM Operating Units (including their employees globally). In addition, this policy applies to consultants, agents, sales representatives, distributors, independent contractors, and contract workers when they perform work for GM.

### V. Compliance

This Policy is mandatory.

### VI. Definitions

GM Operating Unit –Manufacturing and non-manufacturing locations where GM designs and builds vehicles and components, and all other locations where GM conducts business to support its operations. These locations include but are not limited to assembly, stamping, global propulsion systems, components, distribution centers, warehouses, training centers, technical and engineering centers, proving grounds, as well as office buildings.

GM Operating Unit does not include:

- i. a subsidiary (including a joint venture) in which GM owns directly or indirectly less than fifty percent (50%) of the equity or which GM otherwise does not control;
- ii. third party suppliers with contractual operational control operating on GM-owned or GM-leased property; and
- iii. dealerships where the real estate is owned or leased by GM, but the dealership is operated by a third-party under a franchise or other agreement; provided, however, that in the event a dealership is operated directly by GM, such dealership would be considered a GM Operating Unit for purposes of this policy.

### VII. Policy

GM Operating Units are responsible to understand and comply with all applicable laws and regulations, as well as conform to all applicable GM policies, standards, procedures and performance criteria.

***Policy Governance and Oversight*** –The Environmental Compliance Oversight Committee (ECOC) provides environmental policy governance and oversight. The ECOC is chaired by the Executive Director, Global Regulatory Affairs, Environment, Energy, and Safety Policy and the Executive Vice President of Global Manufacturing. Additional committee members include: the General Auditor, Legal Staff Environmental Practice Area Manager, and the Executive Director of Global Environmental Compliance and Sustainability. The ECOC was formed at the direction of the GM Executive Oversight Committee (management leadership group appointed by the Board of Directors and Chief Executive Officer) and meets at a minimum of three times per year, or as required, to establish policy direction and monitor the compliance status of GM’s environmental management systems.

*Oversight Roles and Responsibilities* – All employees are required to follow this policy. The following key groups provide oversight:

Public Policy Center – Responsible for driving policy development and monitoring policy implementation.  
Global Environmental Compliance and Sustainability (GECS) – Budgets for and manages global environmental resources (includes corporate, regional and plant environmental staff). Develops and implements environmental procedures and control programs that support policy and compliance. Supports the development and implementation of the GM Operating Unit environmental programs and actively monitors the level of environmental compliance/conformance with legal and policy requirements.

Legal Staff – Provides legal advice to support compliance at the policy development level as well as providing support to GM Operating Unit compliance programs.

Audit Services – Responsible for periodic auditing of GM Operating Units to ensure that effective risk and control practices are in place and operating in a globally consistent and compliant manner that at a minimum meet legal requirements and this policy.

GM Operating Units – Understand and comply with all applicable environmental laws and regulations, as well as all applicable GM environmental policies, procedures, standards, and performance criteria and provide appropriate resources and adequate budgets to ensure that all employees understand and execute their environmental responsibilities. Ensure that all projects are funded to meet all GM environmental policies, procedures, standards, and performance criteria.

*Performance Self-Assessments* – As part of a robust management system, each GM Operating Unit must establish a process to periodically monitor the level of compliance to country specific laws and regulations and conformance to GM environmental policies, standards, procedures and performance criteria. These self-assessment activities must be capable of driving effective corrective and preventative action. Assessments must be conducted in full conformance with the requirements outlined in company procedures and the GM Operating Unit’s management system(s).

*Record Keeping* – Governmental laws and regulations require specific documents and records to be maintained. Additional record keeping requirements may be specified in operating permits, licenses, consents or by other GM policies. Record keeping requirements may include many types of records, such as incident reports, manifests, monitoring data, and training records. All GM Operating Units must fully assess their record keeping responsibilities and implement a program that ensures a level of compliance that is accurate, truthful and complete.

*Reporting* – Certain laws require timely notification and/or reporting to government agencies for certain types of incidents (e.g., injuries, chemical releases, etc.). The GM Operating Unit must understand all of its reporting obligations and ensure a process is in place to report all compliance information timely, accurately and responsibly to corporate staffs and regulatory authorities. In addition, GM Operating Units must provide accurate and timely environmental metrics and data through sound reporting practices. This data is the basis for internal and external reporting.