

GENERAL MOTORS

Global Speak-Up! Non-Retaliation Policy

I. Purpose

General Motors is committed to establishing a culture where everyone feels free to share concerns regarding the operation of the business, especially concerns about product safety, employee safety, and illegal or unethical behavior. To achieve this goal, GM strives to maintain an environment where anyone can speak up without the fear of *retaliation*.

This Policy establishes GM's position on *retaliation* against anyone who speaks up to share concerns made in *good faith*. It is intended to help you speak up with confidence and without fear of *retaliation*.

(Note: Italics indicate words that are specifically defined in the Definitions section of this document.)

II. Applicability

This Policy applies to everyone in our company, at every level, including employees, supervisors, board members, and subsidiaries that GM controls or owns more than 50%.

III. Superseded Policy

This policy supersedes the Speak Up! Non-Retaliation Policy published on October 29, 2014.

IV. Definitions

Good Faith – A genuine belief that a potential safety issue exists or that possible misconduct has occurred. Good faith requires that a complete and accurate report is given.

Misconduct – Conduct that does not comply with laws, regulations, policies, procedures or GM's Code of Conduct, Winning With Integrity. Examples include fraud, theft, bribery, corruption, workplace violence, discrimination, harassment, misuse of company resources, conflicts of interest, information breaches, improper accounting controls or purchasing arrangements, failing to cooperate with investigations, covering up situations that should be reported, and other unethical behaviors. Misconduct can also include not following safety rules.

Retaliation – Any negative action taken against a person for reporting a safety concern or misconduct in *good faith*. Such actions include threats, intimidation, exclusion from team events, harassment, discrimination, limiting career opportunities, reassignment, negative performance feedback independent of actual performance deficiencies, or termination.

V. Policy

GM will not tolerate *retaliation* against anyone who in *good faith* reports a concern about GM's operations.

If you believe you have been retaliated against, or if you witness *retaliation* against someone else, you should immediately report the situation using the processes described below. GM will investigate all allegations of *retaliation*, and take corrective action to address incidences of *retaliation*, up to and including termination of employment or the relationship with the offending party.

This protection also applies to anyone reporting actual or potential safety-related defects or potential non-compliance with the U.S. Federal Motor Vehicle Safety Standards (or equivalent laws and regulations outside the U.S.).

- A. Reporting Processes** – All GM employees have an obligation to report safety concerns or *misconduct*. Consistent with GM's Speak Up for Safety and Awareline processes, anyone can report potential vehicle or workplace safety issues or potential *misconduct* by GM, its management, supervisors, employees or agents, at any time.

Employees are encouraged to report concerns first to their supervisor, HR contact, the Global Ethics and Compliance Center, Chief Compliance Officer, Regional Compliance Officer, Legal Staff contact, or local leadership.

If you are uncomfortable reporting through established internal channels, or if you have exhausted efforts to raise awareness and your reports are not appropriately addressed, you can make a report using the Speak Up for Safety process (if a safety-related concern) or report anonymously via the Awareline program. You may also report your concern using the Global Reporting Investigations Tool (GRIT).

- B. Employee Safety Concern Process** – The Employee Safety Concern Process exists at every manufacturing site and many other sites globally. Employees and others are encouraged to first report workplace safety concerns through the Employee Safety Concern Process or other existing local reporting processes. You may also raise safety concerns at any time using the Speak Up for Safety process.
- C. Speak Up for Safety Process** – If you are considering submitting a safety idea or concern via Speak Up for Safety, it is recommended that prior to submission you discuss your concern with your supervisor (if you feel comfortable doing so). This is the most effective process for addressing a safety concern and will provide your supervisor with an opportunity to confirm whether efforts are already underway to address the idea or concern. GM's objective is always to use whatever method will allow the safety concern to be resolved as quickly as possible. You may report your concern anonymously as well, but are encouraged to identify yourself to allow for more robust follow up and recognition.
- D. Special Reporting Processes for Europe** – Due to the legal requirements in Europe, notably the laws related to the protection of personal data, the GM Policies governing the GM Speak Up for Safety and Awareline programs in Europe differ from that of other countries. See the Europe program web pages for additional information on the scope and reporting methods.

If you have additional questions on the Speak Up for Safety program for Europe or would like more information, please contact the Global Ethics & Compliance Center or send an email to the Regional Compliance Officer for Europe.

If you have additional questions on the Awareline program for Europe or would like more information please contact Global Security or send an email to gme.awareline@gm.com.

VI. Related Regional/Country Policies

Regional or Country Policies may not conflict with this Policy.

Legal Notice: Nothing contained in this document creates a contract of employment between GM and its subsidiaries and affiliates and any individual, nor does it otherwise alter the nature of an individual's employment with the Company. Nothing contained herein relieves an individual of the conditions of his or her employment, including performance obligations resulting therefrom.