

# **General Motors U.S. Corporate Political Contributions and Expenditures Policy**

**Publish Date – 05/25/2010**

**Review Date – 05/20/2010**

- 1.** General Motors Company (GM) is committed to being a responsible corporate citizen, to ensuring compliance with the letter and spirit of the law, and to promoting disclosure and accountability regarding political contributions and expenditures.
- 2.** This policy supports GM's interest in promoting public policies of concern to GM, educating public officials about our business, and facilitating employee contributions to political candidates through the General Motors Company Political Action Committee (GM PAC) and various GM state political action committees, while complying with all relevant laws and regulations governing political contributions or expenditures for federal, state, or local elections, including the reporting and disclosure of such amounts.
- 3.** Federal law generally does not permit contributions, including in kind contributions, by corporations to candidates for federal office or national party committees, but corporations may make contributions to candidates running for state or local office in some states and may contribute to various organizations that engage in political activities.
- 4.** GM and its employees participate in the political process as individuals and through the GM PAC and various GM state political action committees, the purpose of which is to contribute funds of eligible employees to political committees or candidates. These political action committees are funded by voluntary contributions from eligible employees. As permitted by law and authorized by the Vice President Government Relations, corporate funds and facilities may be used to provide the administrative support for the operation of GM political action committees.
- 5.** Using the following criteria, GM PAC and GM state and local contributions will be guided (pursuant to governing law) by a Steering Committee and a separate Campaign Selection Committee appointed by the Chief Executive Officer of GM:
  - a. Public integrity of the candidate
  - b. Representation of a jurisdiction of importance to GM
  - c. General support for issues of importance to GM
  - d. Service in a leadership role
  - e. Nature of the opposition
  - f. Financial need

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- 6.** The Vice President Government Relations will review, at least annually, with the Public Policy Committee of the GM Board of Directors all corporate political contributions as well as GM PAC and various GM state political action committee contributions and expenditures and the process by which those are made.
- 7.** To promote transparency, GM's annual voluntary disclosure will include the following information on GM's publicly available website:

  - a. A copy of the General Motors Policy on Corporate Political Contributions and Expenditures,
  - b. A list of the amount and recipient of corporate contributions to section 527 organizations,
  - c. A list of the names and amounts of corporate contributions made to individual candidates for state or local office,
  - d. For each U.S. organization identified as tax-exempt by the Internal Revenue Service as either a section 501(c)(6) trade association or a section 501(c)(4) social welfare organization that receives at least \$50,000 in dues or similar payments during a given year, the portion of the payments that is identified by the organization as being used for non-deductible political expenditures, and
  - e. A link to the FEC website which details employee contributions to the federal GM PAC as well as GM PAC contributions.
- 8.** GM will disclose the above information by March 1 of the year following the year in which the payments were made.
- 9.** GM will not reimburse anyone for a political contribution or expenditure.
- 10.** GM encourages elected officials to tour GM facilities consistent with applicable laws and policy. Candidates for public office are not permitted to use GM facilities for campaign purposes, such as the distribution of campaign literature and making of campaign speeches, unless authorized in advance by the Vice President Government Relations and permitted under governing law and policy.
- 11.** GM has supported national party conventions and selected meetings of public officials as an opportunity to promote our products and public policy positions. At the time of the national political party conventions, GM will carefully consider its convention participation and attendant opportunities to showcase its products and to support national party committees, host city committees, or other organizations involved with the convention.

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**12.** Republican and Democratic Presidential candidates may visit no more than three GM plants at the mutual agreement of GM and the National campaign headquarters of the nominees during the election cycle. These restrictions apply not only to visits by the candidate but also to visits by the candidate's immediate family.

**13.** GM encourages personal participation by employees in the political process, consistent with good citizenship, including exercising their right to vote. However, employees' political efforts, such as helping to elect a federal, state or local official, must be on a purely personal basis, and may not in any way imply that such activities have the concurrence or endorsement of GM. Except for participation in GM PAC and various state political action committees or other political activity directly authorized in advance by the Vice President Government Relations (subject to applicable laws), GM employees may not make or offer contributions, expenditures, or assistance, on behalf of GM, in connection with elections to public office. GM employees may not furnish services to any candidate or his or her staff during the employee's normal working hours or use corporate stationery, facilities or other property to support a candidate. In addition, employees should not use their positions or titles with GM in their personal efforts to elicit support on behalf of a candidate or political party. All GM employees should be alert to the possibility of actions that might be considered contrary to this policy and notify their management if they become aware of such actions.

**14.** GM needs to maintain its ability to interact with a comprehensive network of thought leaders who help shape public opinion and policy about the auto industry and at the same time maintain the highest standards of integrity and the ethical conduct of business. To that end, GM may provide information to legislators, regulators and the public, in the form of testimony, advertising, communications or information releases.