

GENERAL MOTORS COMPANY ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

GM's supply chain is extraordinarily complex, involving many tiers of suppliers that directly or indirectly supply raw materials, components and services from locations across the globe to GM's global facilities. This supply chain complexity frequently prohibits GM from engaging with each supplier in its supply chain. Nonetheless, GM engages its direct suppliers, employees and contractors, and is deeply involved in industry wide activities through organizations such as Automotive Industry Action Group ("AIAG"), including training development, funding, and identification of high-risk areas, in addition to other activities, to help eliminate slavery and human trafficking from GM's supply chain.

GM's General Terms and Conditions forbid GM's suppliers, and their subsuppliers, from using forced labor

GM expects its suppliers to be fair, humane and lawful employers, and to enforce similar requirements from their subsuppliers. These expectations are outlined in GM's standard purchase contract terms and conditions, which reinforce GM's zero-tolerance policy against the use of child labor, abusive treatment of employees and corrupt business practices in the supply of goods and services to GM.

The relevant part of Paragraph 31 of GM's General Terms and Conditions (and the predecessor clause), applicable to standard contracts with GM's direct suppliers, provides:

31. COMPLIANCE WITH LAWS

Seller, and any goods or services supplied by Seller, will comply with all applicable laws, rules, regulations, orders, conventions, ordinances or standards of the country(ies) of destination or that relate to the manufacture, labeling, transportation, importation, exportation, licensing, approval or certification of the goods or services, including, without limitation, those relating to environmental matters, the handling and transportation of dangerous goods or hazardous materials, data protection and privacy, wages, hours and conditions of employment, subcontractor selection, discrimination, occupational health/safety and motor vehicle safety. Seller further represents that neither it nor any of its subcontractors, vendors, agents or other associated third parties will utilize child, slave, prisoner or any other form of forced or involuntary labor, or engage in abusive employment or corrupt business practices, in the supply of goods or provision of services under this Contract.

GM's suppliers are required to certify compliance with applicable laws

GM's terms and conditions also require suppliers to provide written certification of their compliance with GM's requirements that prohibit the use of forced or involuntary labor, and GM periodically conducts supplier compliance surveys to confirm compliance. This certification

process supports GM's efforts to verify its product supply chain and to evaluate the risk of human trafficking and slavery. GM has not historically conducted third party verification of its supply chain, nor does GM audit suppliers' compliance with standards relating to human trafficking and slavery.

We assess supply chain risk related to human trafficking and forced labor

GM requires its direct first tier suppliers to validate the component parts for which GM contracts and to also validate the processes used by the supplier to manufacture the parts. This validation process is to confirm that the parts and the processes used by the supplier satisfy relevant quality and manufacturing criteria. Through this validation process, GM employees and contractors are able to assess the risk of slavery and human trafficking associated with the supplier's manufacturing operations.

We endorse industry principles and support training to address supply chain risk related to human trafficking and forced labor

In the automotive industry generally, it is difficult to engage directly with all levels of the supply chain with respect to slavery and human trafficking. GM, together with other major original equipment manufacturers, collaborate through AIAG to address issues impacting the entire industry, including slavery and human trafficking. GM employees maintain leadership positions in AIAG, and GM provides direct financial support to AIAG. Further, GM endorses Automotive Industry Action Group's Corporate Responsibility Guidance Statements, which provide guidance on business ethics, global working conditions and environmental responsibility, including guidelines generally prohibiting slavery and human trafficking.

Moreover, direct supply chain training is an integral component to GM's efforts to eradicate slavery and human trafficking from the supply chain. GM, through AIAG, provides training to its suppliers and employees regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other participating AIAG auto company members, all of which contribute to developing the content of the training. Training participants review the areas of child labor, forced labor, freedom of association, harassment and discrimination, health and safety, wages and benefits, and working hours. The training is provided to suppliers in high-risk areas at no cost to the supplier. In addition, GM provides training to its employees in the supply chain and supplier quality functions who are responsible for physically attending supply chain facilities.

GM maintains relevant internal policies and procedures

GM has in place several internal and external policies that are relevant to anti-slavery and human trafficking policies. Winning With Integrity, GM's code of conduct, applies to GM employees and also, in certain instances, to individuals who represent GM such as consultants, agents, sales representatives, distributors, independent contractors, and contract workers. The basic tenets of GM's code of conduct, require GM employees and representatives to exercise accountability and integrity in conducting GM's business. In addition, the code of conduct requires employees to comply with all applicable laws, including any applicable law prohibiting slavery and human trafficking. On a yearly basis, GM requires its salaried employees to certify their awareness of

and compliance with the Winning With Integrity code of conduct. Employees who violate GM's code of conduct are subject to disciplinary action, which may include termination of employment. GM also has an anti-harassment policy that strives to keep the work environment free from intimidation and harassment by broadly prohibiting abusive behavior.

GM also maintains procedures for reporting potential safety concerns, potential misconduct, and concerns about potential ethical violations. Speak Up for Safety and the GM Awareline allow employees and others (e.g., contractors, and suppliers) to report concerns of misconduct by the company, its management, supervisors, employees, or agents. Reports can be made 24 hours a day, 7 days a week by phone, web, email, post or fax. Individuals filing reports on Speak Up for Safety and the GM Awareline can remain anonymous and calls and messages are never recorded or traced. Regional links to access information for GM's Awareline may be found at <https://gmweb.gm.com/HR/Security/Pages/Awareline.aspx> Information about Speak up for Safety may be found at <https://www.speakupforsafety.gm.com/>

Finally, individuals who raise concerns in good faith are protected from retaliation by GM's anti-retaliation policy. The policy prohibits any adverse action against an employee for reporting a safety concern or misconduct in good faith. Adverse actions can include threats, intimidation, harassment, discrimination, limiting career opportunities, or termination.