



# Human Rights

We are committed to upholding and respecting human rights.

GM's approach to human rights is grounded in our understanding of our potentially salient issues and our company-wide commitments, which include expectations for our suppliers and manufacturing plants.

In 2023, we implemented a new automated process for real-time monitoring of compliance with international standards related to the minimum age of workers and the types of work individuals under age 18 may perform. The program remained an important part of GM's due diligence strategy for our internal operations in 2024.

We require all eligible salaried employees to complete Corporate Required Training courses annually. In 2024, we achieved a 100% completion rate across our salaried employees for the required courses, which included the [GM Code of Conduct: Winning with Integrity](#). We deploy new or refreshed content every year and will keep developing more advanced training materials for specific functions as part of our human rights program strategy.

We designed and piloted a new program for assessing a broad spectrum of common human rights and labor-related risks within our own facilities in 2023. These assessments helped us gain valuable insights into potential risks and impacts at the facility level, including potential targeted prevention and mitigation strategies.

We plan to refine and expand this program to more of our facilities over the next three years, using custom human rights due diligence protocols developed with expertise from the global assurance firm [LRQA](#). This program will also inform the development of updated human rights strategic priorities and focus areas based on a refreshed human rights saliency assessment.

## Policies

GM's [Human Rights Policy](#) establishes how we define, approach, govern, and support universal human rights and the dignity of people throughout our operations, the communities in which we operate, and our global supply chain. Along with our [Supplier Code of Conduct](#), the Human Rights Policy contains expectations for suppliers and contractors.

The Human Rights Policy includes a commitment to respect internationally recognized human rights and sets out our expectations on a variety of human rights topics. It is guided by the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, OECD Due Diligence Guidance for Responsible Business Conduct, OECD Due Diligence Guidance for Responsible Minerals and the UN Universal Declaration of Human Rights. GM's robust Supplier Code of Conduct further affirms our commitment to respecting human rights throughout our supply chain and articulates the high standards to which we hold suppliers.

Through our Supplier Code of Conduct, [Anti-Slavery and Human Trafficking Statement](#), [Responsible Materials Policy](#), and [Conflict Minerals Policy](#), we set out our expectation that our suppliers and business partners make their own commitments to human rights, including to the International Labour Organization's Core Conventions against forced labor, child labor, discrimination and harassment, and protecting freedom of

association and the right to collective bargaining. In accordance with our Supplier Code of Conduct, suppliers should cascade similar expectations through their own supply chains.

## Human Rights Strategic Priorities and Focus Areas

Strategic Priorities	Focus Areas			
Take action on <b>salient issues</b>	Build and strengthen action plans for identified salient issues	Engage affected stakeholders	Develop metrics, assess baseline, track progress	
Ongoing implementation of systems for <b>human rights due diligence</b> (both proactive and reactive)	Strengthen systems to identify and manage risks	Embed capacity and enhance expertise on human rights	Communicate progress through reporting and disclosure	Perform due diligence specific to high-risk commodities
Manage human rights impacts related to <b>specific business models</b>	Assess and address human rights risks related to Electric Vehicles (EVs)	Build and use leverage with joint ventures (JVs) to assess and address human rights risks	Enhance human rights due diligence in select high-risk geographies	

## Governance and Management

Human rights are an important issue addressed by the Board and cross-functionally across the company. The Board provides regular oversight of human rights-related issues and topics, including routine workplace safety reviews and our Human Rights Policy, and addresses human capital management and supply chain matters as needed.

As outlined in its charter, the Board's Governance and Corporate Responsibility Committee (GCRC) has primary oversight responsibility for human rights and conducts reviews of GM's human rights practices, including responsible sourcing practices.

GM's chief sustainability officer (CSO) is the executive in charge of our Human Rights Policy, supporting its implementation and regularly considering potential updates. Human rights-related responsibilities are distributed across GM, with senior leaders accountable for setting strategy and overseeing day-to-day management of human rights matters related to their areas of focus.

## Communicating Our Commitments

We are committed to upholding human rights across our operations and supply chain. We aim to have our entire global workforce understand our human rights commitments and to be aware of our Human Rights Policy. To achieve this, we developed our global communications strategy, which delivers critical information through GM's internal channels, as well as our supplier communications channels. The Human Rights Policy is [available in nine languages](#), reflecting our primary operating regions, to promote ease of access and understanding.

# Human Rights Due Diligence

To effectively prevent and mitigate potential negative impacts to people, the UNGPs define how to identify what those potential impacts could be and prioritize them in a process known as a human rights saliency assessment, or a human rights impact assessment.

## Salient Human Rights

As a part of our last saliency assessment 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 business and geographic footprint to identify and prioritize potential human rights-related impacts.

Nearly all the potential impacts we identified are systemic and not unique to GM or even the automotive industry. Nevertheless, we take our responsibility to identify, prevent, mitigate, and remediate potential human rights impacts, as detailed in our Human Rights Policy.

We see the saliency assessment process as an ongoing exercise with potential impacts and prioritization that may change over time. We are in the process of producing an updated assessment of our salient risks, which will inform a refreshed human rights strategy roadmap.

## Addressing Salient Human Rights Risks: Child Labor

GM actively identifies and assesses its human rights risks and impacts, prioritizing salient issues through stakeholder engagement, including on issues related to vulnerable groups. To this end, GM pays special attention to risks related to child labor both in our operations and in our supply chain. We have implemented appropriate policies and procedures for addressing child labor concerns in our operations and we periodically conduct training and other awareness activities with our internal workforce and our suppliers consistent with our Supplier Code of Conduct.

## Addressing Salient Human Rights Risks: Forced Labor

We expect suppliers to abide by the Supplier Code of Conduct, including the forced labor section, at all tiers of the supply chain. We expect our first-tier suppliers to cascade our Supplier Code of Conduct to all lower tiers so that all tiered suppliers will commit to preventing forced labor. Building on this expectation, we prioritize mapping high-risk supply chains to raw materials.

We conduct audits at Tier I and sub-tier sites to assess working hours as well as the presence of foreign migrant workers, withholding of wages and documents, and recruitment fees.

To strengthen our supply chain due diligence, we are a member of the [Responsible Business Alliance](#) (RBA). We use the RBA's risk assessment and auditing tools to further our human rights monitoring efforts, including by identifying high-risk suppliers for whom we engage to remediate risk.

Where we find non-conformance, we work with RBA and suppliers to develop corrective action plans and monitor them until the non-conformance is remedied. If findings cannot be remediated using our leverage, we will escalate up to and including termination of the contract.

## Preventing and Mitigating Impacts

We work to recognize and address potential adverse impacts and take steps to prevent, mitigate, and where necessary, remediate those impacts. We rely on training as a tool to prevent human rights-related issues from arising, as well as robust reporting and internal review mechanisms to rapidly identify and respond to issues.

GM employs an independent third-party grievance mechanism called the GM Awareline. It is accessible at any time to everyone, including our suppliers' stakeholders, to report concerns anonymously. Through our Supplier Code of Conduct, we expect suppliers to share information about the GM Awareline with their workers or establish their own mechanism.

We are expanding our due diligence efforts to gain more insight into how our suppliers are meeting our human rights expectations.

In 2024, GM initiated an auditing program focused on social compliance, which is a widely used framework that promotes responsible practices within a company's operations and supply chain. We successfully completed three social compliance audits through the RBA. This program aims to ensure that our suppliers adhere to ethical labor practices and meet our sustainability standards.

We are committed to continuing our auditing efforts to further enhance compliance and accountability within our supply chain and own operations.

## Engaging Stakeholders

Stakeholder engagement is an important aspect of our approach to human rights. Hearing directly from the people our business may impact gives us critical input for developing effective policy. These conversations build trust and provide invaluable opportunities to learn and to co-create potential solutions.

In 2024, the GM Ethical Sourcing Team successfully completed 10 sessions of the Ethical Insights Series, designed to empower and educate GM suppliers on the importance of ethical sourcing practices.

Through a series of comprehensive training sessions, the program provides suppliers with the knowledge and tools necessary to develop and implement robust ethical sourcing programs within their organizations.

The engagement series saw an average attendance of 500 suppliers per session. Topics included an introduction to ethical sourcing, OECD guidelines, child labor, conducting due diligence and more. To enhance the learning experience, we invited guest speakers and experts in their respective fields to present to our suppliers. The live Q&A segment allowed suppliers to ask questions and engage directly with the experts, fostering a deeper understanding of ethical sourcing practices.

Recognizing the importance of this training, we have made it available as an optional course for all GM employees. This initiative not only equips our employees with the knowledge necessary to uphold our ethical sourcing commitments but also fosters a culture of awareness and accountability throughout the organization. To manage engagement, we established the Location and Ethical Sourcing Risk Board, which brings together buyers, supply chain leadership, trade, legal, resiliency and ethical sourcing teams. This collaborative effort provides comprehensive oversight of the program and facilitates the review of high-risk suppliers.

For more information about the ways in which we engage our stakeholders, see our 2022 [Corporate Human Rights Benchmark disclosure](#) (section B.1.8).

## Collaborations

GM collaborates with multiple nongovernmental organizations (NGOs) that specialize in addressing issues related to child labor; free, prior and informed consent; and forced labor.

These collaborations provide GM with valuable insights into on-the-ground challenges faced by communities, enabling us to better understand the complexities of these issues. Additionally, these NGOs often facilitate communication with local communities, helping to promote the inclusion of their voices in our decision-making processes.

Moreover, many of these NGOs conduct independent and frontline research within industries, providing us with valuable insights that strengthen our programs and support our responsible sourcing teams.

## **Collaborating With Our Industry**

We also work closely with many industry and supply chain-focused organizations, including the Automotive Industry Action Group (AIAG), in which we actively participate in the Responsible Materials Work Group and several of its subgroups. We also sit on its Corporate Responsibility Steering Committee. AIAG fosters dialogue and collaboration across the automotive industry related to conflict minerals and high-risk materials. In 2024 GM also collaborated with AIAG to provide training to employees and suppliers through Supply Chain Sustainability eLearning. Moving forward, GM will continue to look for more opportunities to engage with our industry to evolve ethical sourcing practices.

## **Responsibly Sourced Minerals**

Many advanced technologies, including EVs, depend on minerals and materials that may originate from conflict-affected and high-risk areas (CAHRAs), or otherwise present elevated risk of adverse human rights impacts. In response, we prioritize responsible sourcing practices and conduct supply chain due diligence to help promote ethical and sustainable operations.

To identify and address human rights risks, we implement due diligence through our Responsible Materials Program and our Conflict Minerals Program, both of which are aligned with OECD Due Diligence Guidance.

Our approach begins with setting clear expectations for suppliers through our policies, Supplier Code of Conduct, and the frameworks we support. For example, we actively engage with and support the Initiative for Responsible Mining Assurance (IRMA) and The Responsible Minerals Initiative (RMI). IRMA promotes responsible mining practices through comprehensive third-party assessments and certifications. RMI provides third-party assessments and certifications to ensure smelters and refiners source minerals responsibly. We leverage RMI's Responsible Minerals Assurance Process (RMAP), which applies a risk-based framework to evaluate mineral processors. RMI's standards help enhance transparency and support additional due diligence. We encourage supplier alignment with these standards.

These frameworks, along with our policies, form the foundation of our supplier due diligence strategy. Where applicable, they are incorporated into supplier contracts, particularly those involving upstream mining and processing operations. Third-party assessments help us work with suppliers and partners whose practices reflect our values of integrity, responsible sourcing and sound supply chain management. IRMA and RMI also facilitate cross-industry collaboration to share best practices and encourage continuous improvement in mining operations.

For Tier 1 suppliers who are typically downstream from mining activities, we rely on them to gather and report information from upstream suppliers regarding the facilities that process critical minerals – including the country of origin of such materials. This information is provided in response to our requests for conflict minerals and other critical mineral disclosures.

## **Multi-Stakeholder Engagement**

We utilize RMI's standardized reporting templates, including the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT), completed by a subset of Tier 1 direct vehicle component suppliers. These templates cover minerals such as cobalt, mica, lithium, nickel, natural graphite, and the conflict minerals tin, tungsten, tantalum, and gold (3TG).

When suppliers report use of non-conformant smelters or refiners (SORs), we conduct smelter-level analysis and request corrective actions. In certain cases, we initiate targeted outreach campaigns to encourage

removal of high-risk entities. Unresolved concerns may be escalated internally, and continued non-alignment with our expectations may influence future sourcing decisions.

For suppliers with strategic upstream raw material agreements, if IRMA or other third-party assessments identify areas for improvement, we engage those suppliers to develop and implement corrective action plans and maintain ongoing dialogue to monitor progress.

Beyond direct supplier engagement, we actively support efforts that strengthen accountability, compliance, and due diligence throughout the supply chain. As part of our engagement with the RMI, we participate in subgroups such as the Smelter Engagement Team to encourage greater adoption of the RMAP among non-conformant SORs that have not yet met conformance standards. We also contribute to the RMAP Assessment Fund, which provides financial support for initial and needs-based assessments of 3TG SORs, with assessment for other minerals considered individually. Through our contributions to RMI member initiatives, we help share the financial responsibility of upstream due diligence with supply chain partners.

In addition, we support RMI's Upstream Due Diligence Smelter Fund, which facilitates on-the-ground assessments for SORs sourcing from CAHRAs. While existing assurance mechanisms such as iTSCi and Better Mining help reduce the burden in regions like the Democratic Republic of the Congo (DRC), newly identified CAHRAs may lack such infrastructure, requiring independent assessments. This fund enables member companies to help offset those costs and promote responsible sourcing. We also contribute to the RMI Smelter and Refiner Audit Fund, which helps reduce audit-related expenses for eligible facilities.

While we acknowledge the complexity and shared responsibilities inherent in global supply networks, we remain committed to continuous improvement and responsible sourcing—both upstream, where we are closer to the mining activities, and downstream, where we continue to promote robust due diligence.