



General Motors Australia  
Modern Slavery Statement  
2021

# Modern Slavery Statement 2021

## Introduction

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) by the following reporting entities (**GM Australia, we, us, our**) in respect of the actions taken to assess and address modern slavery risks for the year ended 31 December 2021 (**Reporting Period**):

- GM Holdings Australia Pty Ltd (ACN: 603 486 844) (**GMHA**)
- General Motors Holden Australia NSC Pty Ltd (ACN 603 486 933) (**GMHA NSC**)
- General Motors Australia Pty Ltd (ACN: 103 162 956) (**GMA**)
- General Motors Australia & New Zealand Pty Ltd (ACN: 006 893 232) (**GMANZ**)

GM Australia recognises the collective efforts of governments, civil society organisations, companies and consumers to eradicate modern slavery. As part of a global company operating in the automotive manufacturing and sales industry, we have a role to play in these efforts and we are pleased to provide insight into the actions we have taken to better understand the risks of modern slavery in our operations and supply chain.

## Our Structure and Operations

Our parent company is General Motors Company (**GM**), a company headquartered in Detroit, Michigan, that, through its subsidiaries, designs, manufactures, markets and distributes vehicles and vehicle parts. References to GM in this Statement includes the four reporting entities comprising GM Australia. Our Australian headquarters is located in Port Melbourne, Victoria.

- GMHA is an indirect wholly owned subsidiary of GM. GMHA is wholly owned by General Motors Holdings LLC, which is wholly owned by GM.
- GMHA, in turn, wholly owns GMA and GMHA NSC. GMA wholly owns GM ANZ.
- GM ANZ sells vehicles and parts in Australia, predominantly to independently operated dealers and distributors. GMHA NSC also sells parts to independently operated dealers.
- GMHA NSC did not own or control any other entities in the Reporting Year.
- GMA is a holding company that indirectly holds non-majority interests in GM's Korean subsidiaries and 100% ownership in GMANZ.
- GMANZ's business includes complete care, parts and accessories, servicing, roadside assistance, and certified repair network. During 2021, GMANZ owned two entities, one is dormant and the other in liquidation. Apart from this, it did not own or control any other entities.

In 2020, GMANZ embarked upon a new business, General Motors Specialty Vehicles (**GMSV**), which is designed to sell niche products locally via a network of dealers. The products that underpin the GMSV business include vehicles that will be imported into Australia in left hand drive form and then remanufactured to right hand drive to meet Australian requirements. The venture adds sales, marketing and aftersales roles to GMANZ's 200-strong employee presence in Australia.

At the end of the Reporting Period, GM employed approximately 146,000 employees worldwide (excluding GM Financial and Cruise). As GMHA and GMA are holding companies, they did not have employees during 2021. As of December 31, 2021, GM ANZ had 224 employees. Their roles included:

- Executives
- Senior and mid-level management staff
- Store personnel
- Experts / Advisors / Specialists / Team leaders

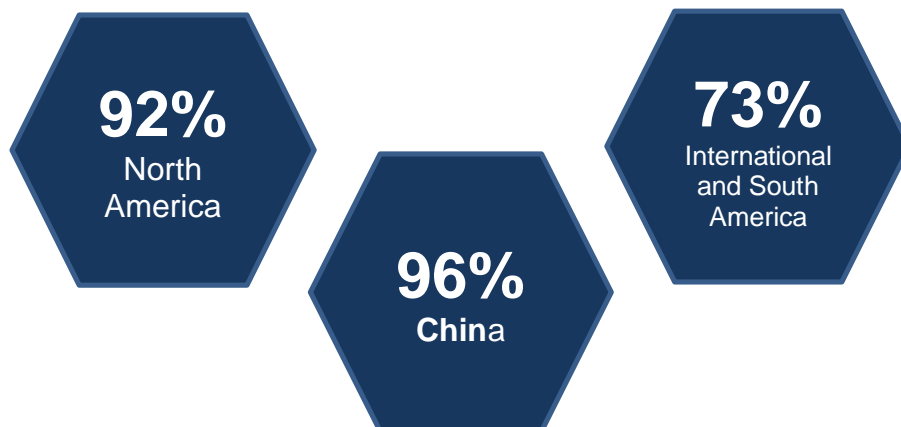
## Our Supply Chain

### Global Supply Chain

GM vehicles are manufactured in various locations across the globe. In 2021, GM sourced approximately 329,000 materials and services from 18,940 global suppliers. This included a wide variety of raw materials, parts and tyres, supplies, transportation and other goods and services. An overview of global procurement is shown below.



### Local Sourcing as a Percentage of Regional Spend



## Local Supply Chain

GMHA and GMA are holding companies and generally do not contract with suppliers. GM Australia primarily procures goods and services from the following categories of suppliers (in addition to vehicles and parts):



**Vehicle sales, services, marketing** - advertising/media, dealer training, signage, auto-shows, contact centres



**Corporate Administrative Services** - health care, security services, contact labour and travel



**Facilities and utilities** – includes facilities and utilities goods and services



**Indirect product** - industrial supplies, office supplies, and building supplies



**Manufacturing Services** - facilities management, chemical management, and waste management



**Information Technology and Telecommunications** – including hardware and software



**Machinery and Equipment** - constructions, dies/presses, paint/body shops, powertrain machine centres



**Professional and Engineering Services** - support product engineering and design staff and support research and development staff

With the exception of vehicles and parts, the majority of GM Australia's direct suppliers are based in Australia. Many of these suppliers provide goods that originate from other jurisdictions.

## Modern Slavery Risks in Our Operations and Supply Chains

Operational Risks	Investment Risks
<p>Based on the roles of GM Australia’s staff, the low risk of modern slavery in Australia<sup>1</sup>, comprehensive workplace relations laws and the policies and procedures we have in place in respect of our workforce, we consider the overall risk of modern slavery in the operations of GM Australia to be low.</p>	<p>GMANZ indirectly holds a minority, non-controlling, interest in two entities in Indonesia. These two entities in Indonesia are the legacy entities for the business in Indonesia. They stopped their activity and are in the process of winding down.</p> <p>GMA indirectly holds a minority, non-controlling, interest in two Korean GM entities that develop, manufacture and sell vehicles. One of those entities, in turn holds a majority interest in GM entities in Turkey and Germany.</p> <p>We do not consider that these minority investments link GMA or GMANZ to modern slavery risk that is not otherwise described in this statement. GM maintains the same policies and procedures, described below, in all jurisdictions. Its Compliance and Audit functions are global.</p>

### Global Supply Chain

In 2021, GM conducted a human rights saliency assessment to identify the potential adverse impacts to people that could be caused by our company’s activities and business relationships. The assessment included desktop research, reviewing industry analyses, connecting with external stakeholders and hosting a series of internal workshops with leaders from across the enterprise and our geographic footprint. In the series of workshops, we identified potential risks and impacts throughout our value chain, considered the severity and likelihood of each impact, and prioritized them for further review and action.

As the auto industry’s development of electric vehicles matures, responsible sourcing is an increasingly important part of our commitment. GM understands that certain minerals predominantly originate from Conflict Affected and High-Risk Areas (CAHRA) where there are heightened concerns that proceeds from minerals could be used to contribute to armed conflict or human rights abuses. In particular, the minerals tin, tungsten, tantalum, and gold (“3TG Minerals”) that are extracted or processed in certain geographies and contribute to armed conflict have become commonly referred to as “conflict minerals.” Similar concerns exist with additional minerals, including cobalt and mica. GM has also acknowledged the human rights risks related to the sourcing of natural rubber for tyres. Please see the ‘*Supply Chain Due Diligence*’ section below for more information on how GM is actively addressing these various risks.

### Local Supply Chain

Salient risks may also be present in our local supply chain which includes a broad range of Tier 1 suppliers from various locations and industries, including those considered a higher risk for modern slavery because of their sector. For example, car washing and detailing, office cleaning, security and transport services are considered higher risk sectors for modern slavery. The risk profile of these sectors is increased by the utilisation of lower skilled workers who are often on temporary visas. We

<sup>1</sup> As reported by the Global Slavery Index.

are also cognisant of the modern slavery risks inherent in the supply chain underpinning our corporate merchandise and the batteries charging our laptops and smartphones.

## Assessing and Addressing Modern Slavery Risks

As described in the United Nations Guiding Principles on Business and Human Rights (UNGPs), governments have a responsibility to protect the human rights of their people, and businesses such as GM have a responsibility to respect the human rights of people. A key part of this is recognizing and addressing potential adverse impacts a business can have on people throughout its enterprise, and taking steps to prevent, mitigate and, where appropriate, remediate those impacts.

A summary of the approach that GM has adopted to manage modern slavery risk follows.

### GM's Commitment



#### *ESG Governance and Oversight*

The GM Board of Directors provides regular oversight of human rights related issues and topics, such as workplace safety, human capital management and supply chain related matters. As noted in the Board's Governance and Corporate Responsibility Committee's (GCRC) charter, the GCRC annually reviews GM's human rights practices, including responsible sourcing practices within the Company's supply chain.

Within GM's Global Purchasing and Supply Chain (GPSC) function, a new Ethical Sourcing team was established in 2021 to implement policies and practices needed to effectively manage the salient human rights issues found within our supply base.



#### *United Nations Global Compact*

GM is a member of the United Nations Global Compact (UNGC), which endorses a framework of principles in the areas of human rights, labour, the environment and anticorruption. We are committed to these principles and are actively implementing them. For more information, please visit our [UNGC webpage](#).

### GM's Policies and Procedures



#### *Sustainability Commitment*

GM's [2021 Sustainability Report](#) notes that GM has developed social goals and strategies in areas such as diversity and inclusion, human rights, and ethical business practice. In order to spur increasing levels of performance and accountability, we have set out the following priorities:

- i. Advance our aspiration to be the most inclusive company in the world
- ii. Respecting rights of all people within our value chain
- iii. Ensure full transparency and ethical integrity throughout our operations



#### *Human Rights Policy*

GM's updated [Human Rights Policy](#) was published in August of 2021. The policy communicates our commitment to respect all internationally recognized human rights, including those described in the Universal Declaration of Human Rights, the Organization for Economic Cooperation and Development (OECD) Guidelines

for Multinational Enterprises, and the International Labor Organization (ILO) Core Conventions and to use the UNGPs as the primary framework for our human rights program. As stated in the policy, GM “recognize(s) and respect(s) the rights of vulnerable groups around the world, such as indigenous peoples, children, and migrant workers. We expect our suppliers to be similarly committed to protecting the rights of vulnerable groups.”



### ***Code of Conduct***

GM’s [Code of Conduct—Winning with Integrity](#)— reinforces our commitment to a work environment founded on mutual respect, trust and accountability. It outlines the policies and obligations that guide our business conduct and includes employee guidance on various reporting mechanisms available to report safety and other concerns. To ensure the effectiveness of our Code of Conduct, we regularly conduct independent third-party assessments of GM’s compliance program against the Department of Justice and other applicable laws, regulations and rules. We also regularly conduct compliance risk assessments.



### ***Non-Retaliation Policy***

Speak Up!, GM’s Non-Retaliation Policy, protects GM employees from retaliation when they raise a concern in good faith. GM’s most recent Ethical Culture Survey, as well as industry benchmarking data, shows that the majority of misconduct reports are made to an employee’s manager. To help our GM managers in such circumstances and to provide additional guidance regarding GM’s Non-Retaliation Policy, the GECC has developed a website that provides helpful compliance tools for managers, including compliance toolkits on various topics, compliance moments to use at meetings, quick reference compliance guides and other materials. GM also makes available a scenario-based “What Would You Do?” course for managers.

In 2021, the GECC developed and is piloting a post-investigation antiretaliation survey to initiate outreach to known reporters following an investigation to identify and respond to potential retaliation and improve the investigative process. These materials help GM managers create a safe and open reporting environment for their teams.



### ***Training for Employees***

Training is a critical aspect of reinforcing our ethical culture because it educates our employees on how to apply the standards and principles set forth in our policies in their work activities. Every year, all eligible salaried employees are required to review the Code of Conduct and complete Corporate Required Training (CRT). New or refreshed courses are deployed annually, often with new content, new scenarios and exercises. We use adaptive technology that tailors the courses to an individual’s job responsibilities.

CRT in 2021 included:

- GM Code of Conduct: Winning with Integrity
- Cybersecurity
- Export and Sanctions Compliance
- Antitrust and Competition Law Compliance

Once employees complete the Code of Conduct training, they are required to certify that they agree to comply with the policies contained in the Code; that they have disclosed any new potential conflicts of interest; and that they have reported any violations of the Code and any vehicle or workplace safety issues. In 2021, GM achieved a 100% completion rate among eligible salaried employees for both our CRT and Code of Conduct Certification Program.

GM has worked with AIAG, of which we are a member, to provide training to our employees through their Supply Chain Sustainability eLearning. The training reflects the Automotive Industry Guiding Principles, which are comprised of three pillars: Business Ethics, Environment, and Human Rights &

Working Conditions. Human rights training topics include child labor and young workers, wages and benefits, working hours, forced labor, freedom of association, health and safety, harassment and nondiscrimination. In 2020, 400 GM employees took the AIAG training; this number increased to 475 in 2021, covering 17 different countries within GM's global footprint



### ***Global Ethics and Compliance Centre***

The Global Ethics and Compliance Center (GECC) prevents, detects and helps correct violations of law and corporate policies and helps promote our ethical business culture. The GECC seeks to align GM's ethics and compliance program with the recognized elements of an effective compliance program and primarily manages GM's Code of Conduct; Non-Retaliation Policy; conflict of interest disclosure process; investigations; ethics and compliance training and communications; global policy development; compliance assurance; risk-based third-party due diligence; whistleblower line; anti-corruption compliance assurance in GM strategic transactions; and other anti-corruption risk areas.

In 2021, we launched a new Compliance Liaison program to help further localize compliance into business units and to serve as an additional knowledgeable resource for identifying compliance issues. Compliance liaisons are GM team members supporting business units and regions who help detect, prevent and resolve potential compliance issues across the company.

In 2022, for the third year in a row, General Motors was also the only original equipment manufacturer automaker recognized as one of the World's Most Ethical Companies® by Ethisphere, a global leader in defining and advancing the standards of ethical business practices.

## **In Our Supply Chain**

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 prevents 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 organisations, such as the 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.



### ***Supplier Code of Conduct***

GM has a zero-tolerance policy against the use of child labour and prohibits all forms of modern slavery and forced labour, as stated in our [Supplier Code of Conduct](#). The Supplier Code of Conduct also states that suppliers and business partners we contract with will not harass or discriminate against employees, nor tolerate corrupt business practices. We expect third parties, including suppliers, to act in a manner that is consistent with the principles and values outlined in our GM Supplier Code of Conduct when conducting business with, and on behalf of, GM. Suppliers are expected to cascade similar expectations through their own supply chains. In 2022, we updated our Supplier Code of Conduct to emphasize our expectation that all suppliers share in our commitments to respect human rights.



### ***Supplier Contracts***

GM expects its suppliers to be fair, humane and lawful employers, and to enforce similar requirements from their sub-suppliers. 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 labour, abusive treatment of employees and corrupt business practices in the supply of goods and services to GM.



Compliance with IATF 16949 Quality Standards is a requirement for GM Tier 1 suppliers. This third-party certification requires suppliers to employ responsible supply chain practices and to have policies on employee code of conduct, antibribery and ethics escalation. Suppliers' IATF 16949 certification status is part of our Sourceability Report, which is a compilation of metrics used to make informed sourcing decisions and support supplier engagement. Ratings related to responsible materials and conflict minerals are also integrated into a supplier's score in our Sourceability Report.

When we become aware of violations or alleged violations of our Supplier Code of Conduct, we respond swiftly and appropriately, up to and including the termination of business relationships.



### ***Annual Verification Surveys***

GM conducts annual verification surveys to validate adherence to GM's Code of Conduct, Terms and Conditions and Supplier Code of Conduct. In 2021, we received responses from over 3,900 suppliers spanning production, logistics, customer care and after sales support.

Suppliers are asked to confirm via the survey that they have:

- Engaged in company business practices consistent with GM's Supplier Code of Conduct or a similar code of conduct published by their company.
- Adopted their own code of conduct or similar document expressing a commitment to conducting business ethically, honestly and in compliance with all applicable laws.
- Shared GM's Supplier Code of Conduct or a similar code of conduct published by their company with their suppliers.
- Implemented a safety policy that is consistent with the principles set forth in GM's Supplier Code of Conduct.



### ***Supply Chain Due Diligence***

Many of the advanced technologies in our portfolio may use minerals and materials that are potentially mined in conflict-affected and high-risk areas. To identify and mitigate human rights risk in sourcing of these raw materials, our due diligence is undertaken in connection with our Responsible Materials Program and our Conflict Mineral Program aligned with the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas. GM's activities related to mitigation include:

- Utilizing Conflict Mineral Reporting Templates (CMRT) to annually survey Tier 1 suppliers with products containing tin, tungsten, tantalum and gold (3TG) to gain visibility of smelters or refiners (SORs) of these minerals in our supply chain. In 2021, 2,602 supplier locations were considered in-scope for GM's Conflict Minerals Program, and we received responses from 94% of these suppliers.
- Validating identified SORs to determine whether they have passed the Responsible Minerals Assurance Process (RMAP). This process, administered through Responsible Minerals Initiative (RMI), employs a risk-based approach to validate SOR's processes in place for responsible mineral procurement. GM sent communications to 10 3TG SORs during the 2021 calendar year.
- Participating within the RMI and its working subgroups, including the Smelter Engagement Team, a subgroup that enables GM to have direct SOR engagement. GM also has participated in RMI-sponsored SOR RMAP pre-audit visits.
- Joining the Initiative for Responsible Mining Assurance (IRMA), a third-party certification of industrial mine sites, and RCS Global Better Mining Initiative for small and artisanal mines
- Engaging with the Global Platform for Sustainable Natural Rubber (GPSNR), an international, multistakeholder organization with a mission to lead improvements in the socioeconomic and environmental performance of the natural rubber value chain. GM

actively participates in two GPSNR working groups alongside civil society organizations, tire makers, natural rubber processors, and smallholder farmers.

Through GM's membership in RMI, GM is also working directly and actively in cobalt and mica subgroups focusing on the following areas:

- Requesting all in-scope suppliers to complete the Cobalt Reporting Template (CRT) and Mica Reporting Template (MRT) in order to map supply chain for components containing these minerals.
- Identifying and assisting with the disposition of cobalt and mica SORs and adding them to the RMI's database.
- Performing outreach to SORs that are not conforming to the RMI industry standards to encourage them to go through the RMI assurance program.



### ***Training for Suppliers***

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 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 labour, forced labour, 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.

In 2022, AIAG will be launching a more robust sustainability eLearning platform that expands on the content of the current training. This interactive and comprehensive platform will engage trainees in scenario-based learning that references specific challenges within the sustainability sphere. GM is serving as a sponsoring company to help finance the tool, and, as a result, training will be free to suppliers. GM expects to begin rolling out the AIAG sustainability eLearning platform to a portion of our supply base in 2022.

GM SupplyPower is an internet portal used by GM to share information, including sustainability event information, policies, guidelines, standards and reports, and best practices with suppliers. It includes a section devoted to sustainability. We encourage suppliers to facilitate discussions with their organizations on important information posted in SupplyPower.

### **Remediation**

As described in GM's Human Rights Policy, and in alignment with the UN Guiding Principles, when we discover potential adverse human rights impacts, we will investigate, and where appropriate, engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their remediation through legitimate processes. Similarly, we expect our suppliers to have processes in place to prevent, mitigate and remediate adverse human rights impacts that they may cause or to which they may contribute, and we expect those suppliers to cascade that expectation through their own supply chains pursuant to our Supplier Code of Conduct.

GM has a robust process for reporting incidents involving possible wrongdoing, including concerns related to human rights. Our primary grievance mechanism, the [Awareline](#), is operated by an independent third party and allows employees, suppliers and others to report concerns of misconduct by the company, its management, supervisors, employees or agents. Reports can be made in more

than a dozen languages, 24 hours per day, 7 days per week, by phone, web or email. Reports may be made anonymously, where permitted by law. The Awareline is accessible to all external individuals and communities and can also be used by our suppliers' stakeholders or any external individual to raise complaints against our suppliers.

Allegations of misconduct are reviewed and prioritized based on a number of factors, including the type of misconduct, the position of the alleged wrongdoer within the company and whether the allegation entails any potential violations of law. High-priority cases receive special scrutiny and review; a cross-functional committee meets monthly to discuss their investigative progress and resolution. There is also a quarterly review process to determine which cases, if any, require reporting to the Board or Audit Committee, as well as processes in case a particular allegation requires more immediate reporting. The Chief Compliance Officer also provides regular updates to the Audit Committee on key GM Global Ethics and Compliance Center priorities and accomplishments and trends in Awareline submissions and investigations.

In 2021, GM received 4,170 reports to the Awareline, of which 3,048 were classified as allegations, and the remaining reports were suggestions, inquiries or other miscellaneous issues. GM tracks all reports of misconduct, whether made to the Awareline or through some other channel, in a case management system that facilitates efficient investigation, follow-up and compliance trend analysis.

Additionally, in 2022, GM joined the Responsible Business Alliance (RBA) organization, which will allow us to further our mechanisms of remedy. RBA incorporates a global worker voice platform into their program which includes a worker surveying tool, audit support, and grievance reporting.

## **Assessing the Effectiveness of Our Actions**

GM utilizes EcoVadis to assess the ethical and sustainable performance of our suppliers. EcoVadis is one of the world's largest and most trusted provider of business sustainability ratings that has evaluated over 90,000 companies through comprehensive questionnaires and data collection. The EcoVadis assessment includes evaluation of a company's policies and practices related to various human rights-related issues, including working conditions, child labour, forced labour, human trafficking, diversity, discrimination, harassment and health and safety.

In 2022, GM incorporated EcoVadis into our procurement strategy by adding participation as a requirement in the Request for Quote (RFQ) process for new business. As of April 2022, over 500 GM suppliers participate in the platform, including more than 300 Strategic Supplier Engagement suppliers who represent 83% of GPSC total spend.

In 2022, GM will also refine and validate our potentially salient human rights impacts with internal and external stakeholders. In parallel with developing action plans, we intend to build out management systems to enhance understanding, ownership and accountability over our salient issues. While we recognize that nearly all of the potential impacts identified are by nature systemic and not limited to GM or even the automotive industry, we take seriously our responsibility to work to identify, prevent, mitigate and remediate potential human rights impacts to which we may contribute. For more information regarding GM's approach to human rights, please see our recently published [2021 Corporate Human Rights Benchmark \(CHRB\) Disclosure](#).

## **Consultation and Approval**

During the reporting period this statement covers, GM Australia actively engaged and consulted with GM in the development of this statement. Each of the Reporting Entities and their owned or controlled entities were consulted in relation to this statement. We discussed details of the Modern Slavery Act 2018's reporting requirements, information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

The four reporting entities have senior management and directors in common who, together with key personnel from General Motors Holdings LLC, have been kept abreast of the preparation of this

Statement. This Statement was approved by the board of General Motors Holdings Australia Pty Ltd on behalf of itself and each of the reporting entities.<sup>2</sup>

Signed by:

A handwritten signature in black ink, appearing to read 'Marc Ebolo', written in a cursive style.

Marc Ebolo  
Managing Director

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<sup>2</sup> The guidance issued by the Australian Border Force provides that the principal governing body of a higher entity can approve the statement on behalf of the reporting entities and a responsible member (usually a director) of the higher entity must sign the statement. A higher entity is an entity that is able to directly or indirectly influence or control each reporting entity.