

U.S. POLITICAL ENGAGEMENT OVERVIEW

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POLITICAL ENGAGEMENT AND CONTRIBUTIONS

Public policy decisions can significantly affect GM's strategies, operations, and, ultimately, shareholder value. To protect shareholder value, GM exercises its fundamental right and responsibility to participate in the legislative, regulatory, and political processes to ensure decision makers are informed by our expertise and insights when considering policies that impact our company, our shareholders, our customers and our employees. GM does this by making political contributions to candidates and entities that support our industry and our vision for the future of mobility, by engaging in direct and indirect lobbying, and by participating in various business and policy organizations that advocate positions designed to support GM's business and enhance long-term shareholder value.

We believe that strong engagement is a critical and appropriate role for companies. In the U.S., there are federal, state and local lobbying registration and disclosure laws that provide transparency with regards to companies lobbying and expenditures, with which GM complies, and the company has a robust training and voluntary political contribution reporting program in place to ensure compliance.

GOVERNANCE, DECISION-MAKING, AND MITIGATING REPUTATIONAL RISKS

The Governance and Corporate Responsibility Committee of our Board of Directors oversees the Company's policies and strategies related to corporate responsibility, sustainability and U.S. political contributions and lobbying activities. The Committee receives regular, formal reports regarding GM's policy priorities and reviews the political contributions and lobbying expenditures made during the year. The Board also receives a monthly update from management regarding significant global policy issues facing the Company. While our Board provides oversight, the Senior Vice President, Global Public Policy is responsible for the activities, positions, and daily decision-making consistent with this oversight. The Senior Vice President, Global Public Policy reports directly to the Company's Chief Executive Officer.

Additional Governance

Procedurally, corporate political spending plans and decisions are reviewed and approved by select senior management.

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. GM's policy is to comply with all applicable laws and regulations (e.g., reporting and disclosure requirements) governing campaign finance, political contributions or

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expenditures, and other political activities in all regions it operates, including U.S. federal, state, local elections.

GM regularly consults inside and outside counsel to confirm its political expenditures and other political and lobbying activities are undertaken in compliance with applicable law and GM corporate policy.

TRADE ASSOCIATION AND BUSINESS MEMBERSHIPS

GM holds memberships in industry, trade and business associations representing the automotive industry and the business community. Engaging with other business and industry stakeholders helps us gain perspective and views on public policy issues that impact our company, our shareholders, our customers and our employees. Additionally, participating in a broad array of groups expands the Company's ability to build coalitions in support of its positions.

GM does not agree with all the positions of every industry, trade or policy organization in which it participates. However, GM believes that through continuous participation with these organizations it has the best opportunity to influence their positions in a manner that aligns with the long-term interests of its stakeholders.

TRANSPARENCY AND DISCLOSURE

As part of our overall effort to promote political transparency and accountability, GM publishes an annual voluntary report of political contributions (referenced above and available for each of the past five years at investor.gm.com/resources).

In addition, GM files publicly available federal Lobbying Disclosure Act Reports each quarter, which disclose GM's federal direct and indirect lobbying expenditures, describe legislation and general issues that were the topic of communication, and identify the registered individual who lobbied on behalf of GM. GM also files similar periodic reports with state agencies. Links to these reports are also available at investor.gm.com/resources.

In recognition of the best-in-class nature of GM's disclosure, the Center for Political Accountability's Zicklin Index of Corporate Political Accountability and Disclosure, which benchmarks the political disclosure and accountability policies and practices of leading U.S. public companies, has recognized the quality of our disclosure and ranked GM among the First Tier of S&P 500 companies.

POLICY REGARDING MAKING POLITICAL CONTRIBUTIONS AND EXPENDITURES

Using the following criteria, GM's Political Action Committee (GM PAC) contributions are guided by a Board of Directors appointed by the Chief Executive Officer of GM:

- a) Character and public integrity of the candidate;
- b) Representation of a jurisdiction of importance to GM;
- c) General support for issues of importance to GM; and
- d) Service in a leadership role.

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Direct corporate political contributions will be guided by the above set of criteria and must receive advance written approval from both the Senior Vice President, Global Public Policy and the GM Executive Vice President and General Counsel, or their designee.

All GM PAC and direct corporate political contributions will be made to promote the interests of GM and without regard to the private political preferences of any employee.

GM does not make independent expenditures that advocate the election or defeat of a clearly identified candidate.

CORPORATE POLITICAL CONTRIBUTIONS

General Motors makes corporate political contributions in the U.S. as permitted by law. Political contributions are made to political parties, political action committees and ballot measures in furtherance of public policies that support the company's business interests. General Motors does not make independent expenditures to expressly advocate for the election or defeat of federal, state, or local candidates.

To promote transparency, GM goes above and beyond what is required by law and annually discloses political contributions March 1 of the year following the year in which the payments were made. The disclosure includes the following information on GM's publicly available website:

- A copy of the General Motors U.S. Corporate Political Contributions and Expenditures Policy;
- A list of the amounts and recipients of corporate contributions to section 527 organizations;
- A list of the names and amounts of corporate contributions made to individual candidates for state or local office;
- 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
- A link to the Federal Election Commission (FEC) website which details employee contributions to the federal GM PAC as well as GM PAC contributions.

Consistent with our commitment to ethical business conduct, political spending reflects General Motors' interests and is not based on the personal interests of any of our individual officers, directors or employees. Furthermore, no contributions are given in anticipation of, in recognition of, or in return for, any official act.

EMPLOYEE POLITICAL ACTIVITY

GM employees take an active role in the political environment through the voluntary GM PAC. GM PAC, and associated state PACs, are independent of any political party. They are designed to provide employees the ability to make financial contributions that can be used to support candidates and participate in the political process. Our employee political

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action committee spending plans are reviewed and approved by the Political Action Committee's Steering Committee and receive compliance clearance before checks are issued.

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 General Counsel, or his designee, (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.

GM PAC complies with all reporting requirements governing political action committee contributions. Employees are prohibited from making political contributions from personal funds and then seeking reimbursement from the company.

POLITICAL COMPLIANCE

General Motors has, within the office of General Counsel, compliance staff dedicated to all aspects of compliance with applicable political laws and reporting obligations. This department, with the assistance of outside legal counsel, informs and educates employees, analyzes legal compliance, monitors and communicates changes in laws, and advises Finance staff on the collection of disclosure information which is used to prepare disclosure reports. The employee training and outreach program consists of the following:

- An online training course required for all public policy employees and officers;
- Online and in-person training for groups identified as having the potential for interface with public officials; and
- A company intranet site with policies related to political reporting and compliance, lobbying, gifts, contributions and political fundraising.

Management oversight for corporate political activity and the GM Political Action Committee resides with the highest-ranking public policy executive of the company.

STATE AND LOCAL POLICY PRIORITIES

AUTONOMOUS VEHICLES

GM advocates for legislative and regulatory opportunities that provide for the safe expansion and use of self-driving vehicle systems. On the state and local levels, GM works closely with governments to allow testing and deployment of self-driving vehicles without human drivers, as well as advocating for other key issues that support GM's Mobility initiatives.

CYBERSECURITY AND DATA PRIVACY

When business competitors, lawmakers, special interest groups, etc. seek state public policy mandates to secure their access to customer and vehicle data, GM engages to protect our customers and the Company from policies which would create unnecessary cybersecurity and privacy risks.

DEALER FRANCHISE

Each year, GM engages with state legislatures when state auto dealer trade associations seek to modify state auto dealer franchise laws with the intention of limiting manufacturers' authority to implement policies and practices established through dealer sales and service agreements. These issues have the potential to raise costs and complexity for auto manufacturers and dramatically increase vehicle and auto parts prices for consumers. In recent years, states have introduced legislation to regulate warranty reimbursement for parts and labor, vehicle subscription services, measures to prohibit manufacturers' sale of parts, as well as restrictions on manufacturer vehicle sales incentives and dealer facility programs.

ECONOMIC DEVELOPMENT

Today, GM is directly responsible for more than 95,000 US jobs and is the economic lifeblood of communities throughout the country. GM works closely with state and local governments on economic development opportunities to strengthen American manufacturing, job creation and retention.

ELECTRIC VEHICLES

GM advocates for the advancement and investment in electric vehicle incentives and charging infrastructure in states across the United States. Nine states adopted electric vehicle ("EV") purchase incentives in 2020 and several states/utilities approved expanded EV charging infrastructure that will assist with greater public adoption and use of EVs. GM continues to support state and local policies that aide in the adoption of electric vehicles by Americans and help fuel GM's vision of Zero Crashes, Zero Emissions, and Zero Congestion.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

In response to the COVID-19 Pandemic, GM has been working closely with state and local governments across the U.S. to facilitate our Company's donation of millions of surgical

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masks and face shields to medical facilities, first responders, schools, and other front-line government agencies.

FEDERAL POLICY PRIORITIES

AUTONOMOUS VEHICLES

GM is proactively advocating to create the federal legal and regulatory environment that will enable the safe deployment of self-driving vehicles. Our team is working with Congress on legislation to clarify federal and state regulatory responsibilities, update Federal Motor Vehicle Safety Standards (FMVSS) for self-driving vehicles, and expand National Highway Traffic Safety Administration (“NHTSA”)-granted exemptions to allow for vehicle deployment.

ELECTRIC VEHICLES

GM is committed to a future with zero emissions and accelerating deployment of EVs for everyday use. GM advocates for federal advancement and investment in electric vehicle incentives and charging infrastructure across the United States. Furthermore, GM supports expansion of the federal electric vehicle tax incentive, which plays an important role in consumer adoption of EVs.

FUEL ECONOMY

GM supports modernizing fuel economy standards and creating one national program. This is why GM has called for a U.S. National Zero Emissions Vehicle (NZEV) program. We will work with the Biden Administration through the Environmental Protection Agency and NHTSA along with the California Air Resources Board to encourage support for this program on our way to a Zero Emission future.

INTERNATIONAL COMPETITIVENESS

GM advocates for legislation that contributes to the future success of American manufacturing and keeps our country’s vehicles and services competitive on a global scale. Our advocacy efforts focus on issues vital to GM’s current and future success, such as trade agreements like the United States-Mexico-Canada Agreement (USMCA) and the Korea Free Trade Agreement (KORUS) that expand our export potential, protect the company’s intellectual property, and create the proper incentives for research and development.

SAFETY

Safety is a top priority for GM. Public Policy works directly with policymakers throughout the country as well as federal regulators at the National Highway Traffic Safety Administration (NHTSA) to focus on safe vehicles and roadways for all.

Distracted driving, the safe deployment of self-driving vehicles, passenger safety and product cybersecurity are all top policy issues for GM. We have advocated for strong safety legislation on the state and federal levels, including HOT CARS legislation in Congress that will help to reduce child fatalities due to being left in overheated vehicles.

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2020 TRADE ASSOCIATION MEMBERSHIPS
FEDERAL LOBBYING EXPENSES \$25,000+

Alliance for Automotive Innovation

U.S. Chamber of Commerce and Institute for Legal Reform

American Automotive Policy Council

National Association of Manufacturers

Business Roundtable

TechNet