

# General Motors Global Platform for Sustainable Nature Rubber Disclosure 2024



#### **GM GPSNR Disclosure RY2023**

This report represents GM's Global Platform for Sustainable Natural Rubber (GPSNR) disclosure for reporting year 2023. GM is a member of GPSNR and as a member company is required to report progress in implementing the company's <u>Sustainable Natural Rubber Policy</u> through annual reporting requirements.

GM is a founding member of GPSNR. We strongly encourage all of our applicable suppliers to become members of GPSNR as well and comply with GPSNR's annual disclosure obligations. We are pleased to confirm that the following suppliers are each members of GPSNR and that these suppliers represent all of GM's Level B suppliers (Processors and Traders of Raw Material) for this reporting period. In no particular order:

• Goodyear, Michelin, Continental, Maxxis, Hankook, and Bridgestone. For additional details regarding the response from each of these suppliers, please refer to their annual disclosure report submitted to GPSNR.

GM acknowledges its ability to influence supply chain participants and to establish expectations relating to inputs used in GM products. Therefore, efforts will be focused on preventing the conversion of natural forests within commodities of high deforestation risk in GM's supply chain. These include two specific raw materials sourced by GM suppliers for GM products that may pose risk for deforestation and/or conversion: (1) natural rubber and (2) leather. GM's membership in GPSNR, as well as our suppliers joining GPSNR, is part of working to address these concerns. This report is a part of those efforts.



#### D.0 - Policy



Question: Do you have a public policy commitment for more sustainable natural rubber?

**Response**: GM Sustainable Natural Rubber Policy

[x] Yes [] No

# D0.2

Question: If Yes, is it aligned with the high-level GPSNR Policy Components for End Users?

Response: [x] Yes [] No

#### D0.3

Question: If Yes, when was it adopted?

Response:

GM's policy evaluation was conducted by GPSNR Secretariat between March 2021 – February 2022.

#### D0.4

Question: If Yes, when was it last revised?

Response: 2022

# D0.5

**Question**: What system does the member use to ensure they are aware of all applicable local, national and international laws on human rights, labor, land use, and the environment, in relation to the member's natural rubber supply chain, and how often are legal requirements reviewed or revised? Provide details system used to track legal requirements.

#### Response:

GM has designated teams responsible for applicable emerging ESG legislation, regulation, and policy, with a process in place to communicate the information to the responsible parties for program implementation and requirements. As members of Responsible Business Alliance (RBA), we have a list of all responsible sourcing applicable legislations.

State the frequency of review/revision:

Review is on an ongoing basis.

# **D0.6**

**Question**: If the member systematically assesses their own legal compliance, how frequently are compliance assessments conducted?

# Response:

[X] Yes

[] No

State the frequency when compliance assessments are conducted: Annually



Our largest suppliers must attest to compliance with our Terms and Conditions, Supplier Code of Conduct, and all applicable laws and regulations. This attestation occurs annually via a supplier compliance survey. GM periodically conducts supplier compliance surveys to confirm compliance as per the Corporate Human Rights Benchmark.

Not conducted (explain why):

#### **D0.8**

**Question**: How does the member manage or monitor risk of corruption related to their operations? NOTE: This applies to the member's entire operations. Member can include any details on anti-corruption efforts that are specific to its natural rubber supply chain if applicable.

# Response:

The member manages corruption through:

- anti-corruption policy [X],
- employee code of conduct [ X ],
- employee training [ X ]
- supply chain corruption risk assessments [X],
- whistleblower mechanism [ X ],
- inclusion of compliance with anti-corruption policy in employee evaluation [X],
- disciplinary procedures and enforcement [X],
- third party due diligence and oversight [X]
- other [X]

For more information please see: 2023 GM Sustainability Report Page 71

### D0.9

**Question**: How does the member train staff on anti-corruption? Provide details, including number or percentage of staff, frequency of training, and method of delivery.

#### Response:

[X] Yes

[] No

Number or Percentage of Staff: 100% global salaried employees

Frequency of Training: Annually Method of Delivery: Online

#### D1 – Tier 1 Suppliers & GPSNR

#### D1.1

**Question**: What share of tires/natural rubber do you buy from suppliers that are members of GPSNR? **Response**:

- [] 0-60%
- [] 61-80%
- [] 81-90%
- [] 91-95%
- [] >96%
- [X] 100%



#### D1.2

Question: List all tier 1 suppliers of tires/natural rubber

Response: Goodyear, Michelin, Continental, Maxxis, Hankook, and Bridgestone

#### D2 – Mode of Supplier Engagement

**Question**: How does the member exercise due diligence in its natural rubber supply chain? **Response**:

- [X] Meetings
- [X] Information by email
- [] Request signature of Sustainable Natural Rubber Policy or equivalent
- [] Request signature of Supplier Code of Conduct or equivalent general CSR company document
- [X] Request desktop evaluation (EcoVadis or other)
- [X] Request minimum score on desktop evaluation
- [X] Request a certification (ISO or other)
- [X] Potential site audit to verify compliance to CSR standards
- [X] Request implementation of corrective action plan in case non-compliance found, with mandatory re-audit in case of major non-compliance
- [X] In case of sustained non-compliance to CSR standards, with no or insufficient corrective action plan: terminate or suspend business relationship
- [] Other (describe):

# D3 - Contribution to Capacity Building

#### D3.1

**Question**: Does the member contribute financially to capacity building of smallholder producers of natural rubber? (through GPSNR or independently)

# Response:

[] Yes

[X] No

#### **D4 – Grievance Mechanism**

### D4.1

**Question**: If the member already discloses information regarding their grievance system, share a link to this information here, otherwise answer:

- Is the member's grievance mechanism publicly available to internal and external stakeholders in their NR supply chain?
- Does the member maintain a record of grievances raised?
- What actions are being taken to address unresolved grievances?

# Response:

Please provide link (and page number if relevant)

GM's Supplier Code of Conduct (available externally and internally) states: Suppliers will provide a clearly communicated grievance mechanism, in local languages, for workers to utilize to report integrity concerns, human rights concerns, safety issues, and misconduct without fear of reprisal.



GM is a member of Responsible Business Alliance (RBA). As part of the organization, we utilize the RBA Voices Tool, which is a medium for workers to file anonymous complaints regarding human rights, safety, and misconduct concerns without fear of repercussion.

Additionally, GM utilizes AwareLine, Speak Up For Safety, and other tools, which our suppliers can use to voice concerns regarding any potential human rights and environmental violations.

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# **D5 - Climate and Energy**

#### D5.1

**Question**: Where may one find information about the member's Climate strategy? (including reporting of scopes 1, 2 and 3 emissions)

# Response:

Please provide link (and page number if relevant)
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