



## Responsible Materials Policy

General Motors Company (GM) is committed to sustainable and responsible sourcing of goods and services throughout our supply chain, including the various raw materials from around the world that are incorporated into our goods or services. As the development of electric vehicles matures, responsible sourcing is an increasingly important part of our commitment.

We recognize the importance of mitigating any adverse impact that procuring, extracting and processing in-scope raw materials listed in this document may cause to the environment, society, and people. This responsible materials policy is an integral part of GM's strategy to manage a sustainable supply chain.

### Scope

The policy covers (1) the critical minerals cobalt and mica; (2) natural rubber; (3) leather. We also incorporate into our goods and services other commodities that may be associated with environmental and/or human rights risks and we may later choose to expand the scope of the Policy. GM continues to review our exposure to, and strategy with respect to our material supply chains.

This policy is effective from the publication date and replaces GM's Sustainable Natural Rubber Policy.

This policy is supplemented by the following policies:

- GM's own Code of Conduct
- GM's Supplier Code of Conduct
- GM's Environmental Policy
- GM's Human Rights Policy

### Critical Minerals

GM understands that certain minerals predominately 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. This portion of the policy and our due diligence practices for critical minerals have been designed in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (OECD Due Diligence Guidance) to address responsible mineral sourcing.

### Goals

We commit to the following in respect of Critical Minerals:

- Exercise due diligence with relevant suppliers in accordance with the OECD Due Diligence Guidance.
- Collaborate with customers, suppliers, and industry associations to help develop long-term solutions to enable responsible sourcing.
- Support sourcing initiatives to improve the upstream communities in our supply chain.
- Encourage smelters and refiners in our supply chain to successfully complete the Responsible Minerals Assurance Process (RMAP) or an equivalent third-party auditing program.

We expect our suppliers to:

- Create and maintain a publicly available responsible minerals policy consistent with the OECD Due Diligence Guidance.
- Establish due diligence frameworks and management systems consistent with the OECD Due Diligence Guidance.
- Utilize annual reporting templates for the in-scope minerals outlined in this policy.
- Utilize smelters and refiners that conform to an independent third-party responsible minerals sourcing program.
- Extend these expectations to all their sub-tier suppliers.

## Natural Rubber & Leather

Forests and other high value natural ecosystems are increasingly vulnerable to threats, and the loss of these areas may contribute to environmental and human impacts worldwide. GM understands the protection of forests and other natural ecosystems is critical for maintaining biodiversity, safe and stable climate systems, and sustaining livelihoods.

GM aims to support our Tier 1 suppliers to become deforestation-free<sup>1</sup> and conversion-free<sup>2</sup> in their natural rubber and leather supply chains by 2030.

### Natural Rubber

#### Goals

GM is committed to sourcing sustainable natural rubber in alignment with the Policy Framework that was adopted in a September 2020 resolution by the General Assembly of the Global Platform for Sustainable Natural Rubber (GPSNR), of which we are a member. GM expects our suppliers to work within their operations, to increasingly source and promote the sourcing of natural rubber products that are processed in line with the GPSNR Policy Framework, which include producing and sourcing natural rubber in a way that:

- Protects high conservation values (HCVs) and high carbon stock (HCS) forests (the cutoff date after which deforestation or HCV degradation is considered non-conforming with this policy is 1 April 2019).
- Protects water and soil resources.

<sup>1</sup> Deforestation-free: Commodity production, sourcing, or financial investments do not cause or contribute to the deforestation of natural forests (as defined by the Accountability Framework)

<sup>2</sup> Conversion-free: Commodity production, sourcing, or financial investments do not cause or contribute to the deforestation of natural ecosystems (as defined by the Accountability Framework)

To implement and demonstrate progress with this commitment, and recognizing the influential role our company can play in contributing to sector-wide transformation, GM is dedicated to:

- **Traceability:** promoting mapping and traceability of natural rubber in our supply chain.
- **Risk Assessment:** assessing our suppliers (including tire suppliers) for actual and potential environmental and social risks and prioritizing risk mitigation actions.
- **Supplier Engagement:** engaging our suppliers on a regular basis to:
  - Identify, prevent, and mitigate environmental and social harms in natural rubber supply chains.
  - To the greatest extent practical, evaluate the environmental and social performance of new and existing suppliers of natural rubber prior to contract sign-off.
  - Consider new suppliers with better environmental and social performance.
  - Establish due diligence processes aligned with the GPSNR policy framework for producing and procuring natural rubber and implementing necessary time-bound measures.
  - Offer guidance and training to our suppliers to support them in understanding our expectations, relying on technical support from GPSNR.
  - In cases of non-conformance with our Supplier Code of Conduct, develop timebound implementation plans for moving towards conformance and remediation of past or ongoing harms.
- **Reporting:** regularly monitoring and reporting on our progress in implementing these policy commitments.
- **Policy Support:** participating in and supporting multi-stakeholder and supply chain policy efforts that enable and enhance sustainable natural rubber uptake in the global marketplace.

## Leather

### Goals

To support our suppliers in reaching deforestation-free and conversion-free goals, GM will communicate its expectations that Tier 1 suppliers do the following:

- Refrain from sourcing raw materials originating from land developed or converted from natural forests or natural ecosystems of high conservation value (HCV) and high carbon stock (HCS) areas after 1 January 2020.
- Refrain from sourcing raw materials developed on peatlands regardless of depth, extent, or status (wet, drained, or dry).
- Refrain from sourcing raw materials from suppliers engaging in the clearance of land by burning for land management or to prepare it for production, except for ecosystems that specifically require controlled burning as a necessary management practice.
- Promote the restoration of forests and other natural ecosystems that may be affected by supplier activities if practicable.

GM will work to:

<sup>1</sup> Deforestation-free: Commodity production, sourcing, or financial investments do not cause or contribute to the deforestation of natural forests (as defined by the Accountability Framework)

<sup>2</sup> Conversion-free: Commodity production, sourcing, or financial investments do not cause or contribute to the deforestation of natural ecosystems (as defined by the Accountability Framework)

- Utilize the available data, science, and external stakeholder engagement to inform our strategy, evaluate the impact of our supply chain, and evolve our supply chain as needed.
- Leverage technology to identify regional and geographically specific supply chain risks related to raw material sourcing for GM products.

GM expects our suppliers that source natural rubber and leather to make annual public disclosures relating to GM products that enable measurement of suppliers' progress towards undertaking the activities described above.

## Remediation

If we determine potential violations of any of these responsible sourcing requirements, we expect the applicable suppliers to 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. We may assess our business relationship with a supplier if identified violations are not remedied.

Similarly, we expect our relevant suppliers to have processes in place to prevent, mitigate, and remediate deforestation impacts that they may cause or to which they may contribute, and we expect those suppliers to cascade that expectation as well through their own supply chains pursuant to our Supplier Code of Conduct.

<sup>1</sup> Deforestation-free: Commodity production, sourcing, or financial investments do not cause or contribute to the deforestation of natural forests (as defined by the Accountability Framework)

<sup>2</sup> Conversion-free: Commodity production, sourcing, or financial investments do not cause or contribute to the deforestation of natural ecosystems (as defined by the Accountability Framework)