



General Motors of Canada Company

Modern Slavery Report 2025

Introduction

This Report (**Report**) is made by General Motors of Canada Company (**GM Canada, we, us, our**) as required under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* for the year ended 31 December 2025 (**Reporting Period**).

GM Canada recognizes the collective efforts of governments, civil society organisations, companies and consumers to eradicate forced labour and child labour. 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 our efforts to address forced labour and child labour risks in our operations and supply chain.

Our commitment to addressing these risks predates this report and is continually evaluated for improvements. Certain initiatives and policies described in this report were implemented before the Reporting Period but continued through the Reporting Period and thereafter.

Our Structure, Activity, and Supply Chains

GM Canada is a company registered under the laws of Nova Scotia with its headquarters in Oshawa, Ontario. GM Canada is an indirect wholly owned subsidiary of General Motors Company, a company headquartered in Detroit, Michigan. General Motors Company and its subsidiaries are referred to herein as **GM**.¹

GM Canada designs, manufactures, markets, and distributes vehicles and vehicle parts. GM Canada also distributes GM-manufactured vehicles across Canada through a network of nearly 450 independently owned and operated authorized dealers. GM Canada also imports vehicles for sale in Canada through its authorized dealer network, as well as vehicle parts for its vehicle production operations in Canada.

In 2025, GM Canada operated a vehicle assembly and parts stamping facility in Oshawa, Ontario; an engine and transmission production facility in St. Catharines, Ontario; an electric vehicle assembly facility in Ingersoll, Ontario (CAMI); and five parts distribution centres (one each in Quebec, Alberta and British Columbia, and two in Ontario).

GM Canada is also home to the Canadian Technical Centre (CTC), which develops key technologies and products. The CTC has three engineering locations across Ontario, including automotive software development and testing-focused engineering at Elevation Centres in Oshawa and Markham, and its Oshawa test track.

As of December 31, 2025, GM employed approximately 155,000 employees worldwide. GM Canada had approximately 6,900 employees. Their roles included:

- Senior, middle and other management staff
- Semi-skilled and skilled trades workers
- Professionals/semi-professionals and technicians

While GM Canada is not subject to reporting requirements under supply chain legislation in other jurisdictions, certain of GM Canada's parent and sister companies are subject to reporting requirements in other jurisdictions.

Our Supply Chain

Sourcing of parts for GM Canada's production and warehousing facilities is primarily centralized in GM's Global Purchasing and Supply Chain (GPSC) function, but GM Canada enters into contracts

¹ Please note that for the purposes of this report, the reporting entity is GM Canada. However, because GM Canada's supply chain is centralized within General Motors Company, information relating to both GM Canada and General Motors Company is provided. See "Our Supply Chain" below.

directly to purchase the parts. GM Canada also sources certain other goods and services directly from suppliers.

Global Supply Chain

GM vehicles are manufactured in various locations across the globe. In 2025, GM sourced from thousands of suppliers worldwide.² This included a wide variety of raw materials, parts and components supplies, transportation and other goods and services.

Local Supply Chain

GM Canada 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** – including 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** - supporting product engineering and design staff and support research and development staff

² For 2025 reporting, includes direct material, Customer Care and Aftersales (CCA), and logistics.

Forced Labour and Child Labour Risks in Our Operations and Supply Chains

Global Operations and Global Supply Chain

In 2025, 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. During these 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.

GM remains steadfast in its commitment to [responsible sourcing](#) and is continually evaluating and evolving our policies and processes in support of this commitment. For example, GM has implemented significant processes around minerals critical to vehicle production—such as the 3TG minerals tin, tungsten, tantalum, and gold, as well as cobalt and mica—that predominantly originate from Conflict-Affected and High-Risk Areas (CAHRAs), where there are heightened concerns that proceeds from minerals could be used to contribute to armed conflict or human rights abuses. GM is also actively addressing human rights risks related to the sourcing of natural rubber for tires. Further detail on GM's efforts to address these risks is provided in the 'Supply Chain Due Diligence' section below.

Local Supply Chain

Salient risks may also be present in our local, Canada-specific supply chain, which includes a broad range of Tier 1 suppliers from various locations and industries. This supply chain encompasses sectors that may be at elevated risk for forced labour or child labour, including office cleaning, food service, security and transport services.

Assessing and Addressing Risks Associated with Forced Labour and Child Labour

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 ours have a responsibility to respect the human rights of people. This responsibility includes recognizing and addressing potential and actual adverse impacts a business may have on people throughout its enterprise, and taking steps to prevent, mitigate and, where appropriate, use leverage to remedy those impacts.

A summary of the approach that GM has adopted to manage forced labour and child labour risk in its global supply chain is as follows.

GM's Commitment



Sustainability Governance and Oversight

Operationally, within GM's GPSC function, GM's Ethical Sourcing team implements policies and practices needed to effectively manage the salient human rights issues found within our supply base. This team monitors and investigates emerging issues and continually evaluates supplier compliance with GM's Supplier Code of Conduct. GM's Chief Sustainability Officer and Global Sustainability function also implement policies and practices, like GM's Human Rights Policy, needed to effectively manage salient human rights risks found within GM's own operations.

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 anti-corruption. GM is committed to these principles and is actively implementing them. For more information, please visit GM's [UNGC webpage](#).

GM's Policies and Procedures

Sustainability Commitment



GM reports regularly on sustainability-related topics, discussing the opportunities and challenges it encounters working to enhance performance and conduct business responsibly. GM's commitment to sustainability extends across its global supplier network and that it is working with suppliers to improve transparency, reduce emissions, and strengthen resilience across its value chain. GM's commitments to human rights are summarized in its [Human Rights Statement](#), and operationalized through its [Human Rights Policy, which](#) together provide an overview of some of GM's long-term goals and aspirations, and efforts in support of them, and offers detail on GM's strategies in areas such as human rights and ethical business practices.

Human Rights Policy



GM's Human Rights Policy, which communicates GM's 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 Labour 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 \(the Code\)](#)—is a foundational document that states our values as a company and reinforces our commitment to a work environment founded on mutual respect, trust, and accountability. The Code outlines the policies 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, we regularly conduct independent third-party assessments of GM's compliance program. We also conduct compliance risk assessments.

Non-Retaliation Policy



Speak Up!, GM's Non-Retaliation Policy, is intended to protect GM employees from retaliation when they raise a concern in good faith. Since the majority of misconduct reports are made to an employee's manager, we have developed a toolkit with a range of helpful compliance tools for managers as well as a manager-specific module in our annual Corporate Required Training (CRT) course.

GM's primary grievance mechanism, the Awareline, is operated by an independent third party and allows employees, suppliers, and others, including the public and surrounding communities to report

concerns of misconduct by the company and its suppliers, and their respective management, supervisors, employees, or agents. For more information on Awareline, please see our Remediation section.



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 and complete CRT which includes a module on Human Rights topics. 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 has historically included:

- GM Code of Conduct: Winning with Integrity
- Cybersecurity
- Additional courses covering risk areas like Antitrust, Export Compliance, Anti-Corruption Compliance, Product & Workplace Safety, etc.

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.



Global Ethics and Compliance Center

The Global Ethics and Compliance Center (GECC) helps prevent, detect, and correct violations of law and corporate policies and helps promote the ethical business culture for GM and its affiliates and subsidiaries. The GECC seeks to align GM's ethics and compliance program with the recognized elements of an effective compliance program and primarily manages our Code; 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 strategic transactions; and other anti-corruption risk areas.

In 2026, for the seventh consecutive year, GM was 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. For the seventh year in a row, GM was also the only original equipment manufacturer included on the list.

Ethisphere evaluates companies across multiple categories (e.g., corporate governance, culture of ethics and compliance programs, etc.) that support sustainable growth and achieving this designation can help build trust with internal and external stakeholders, business partners and regulators.

In Our Supply Chain

GM's and GM Canada's supply chains have significant overlap. GM, as a supplier of finished vehicles to GM Canada, has affirmed its commitment to compliance throughout the supply chain. GM engages frequently with suppliers, and though the supply chain is complex, works to promote transparency and compliance with the law, the Supplier Code of Conduct, and applicable contracts.

Supplier Code of Conduct



GM's [Supplier Code of Conduct](#) prohibits the use of child labour, forced labour, and all forms of modern slavery. The Supplier Code of Conduct also expects that suppliers and business partners we contract with commit to 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. Our Supplier Code of Conduct emphasizes our expectation that all suppliers share in our commitments to respect human rights. Suppliers are expected to cascade similar expectations through their own supply chains.

Supplier Contracts



GM expects its suppliers to be similarly committed to ethical conduct and to be fair, humane and lawful employers, as well as to enforce similar requirements with their sub-suppliers. These expectations are outlined in GM's standard purchase contract terms and conditions, which reinforce GM's commitment to reducing the risk of child labour, abusive treatment of employees, and corrupt business practices in the supply of goods and services to GM.

Compliance with International Automotive Task Force (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 GM's 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 GM or GM Canada 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 supplier self-verification surveys to validate adherence to our Code, Terms and Conditions and Supplier Code of Conduct.

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.

Supplier responses to the survey are reviewed and, as appropriate, are escalated to address identified risks and any instances of noncompliance.



Supply Chain Due Diligence

Many of the advanced technologies in our portfolio may use critical minerals and materials, the mining and processing of which present elevated risk. To identify and mitigate human rights risk in sourcing of these raw materials, GM undertakes

due diligence governed by our Responsible Materials Program and our Conflict Mineral Program. These programs are aligned with the OECD Due Diligence Guidance for Responsible Supply Chains from CAHRAs. GM's activities related to mitigation include:

- Using the Conflict Minerals Reporting Template (CMRT) to survey Tier I suppliers with products containing 3TG that were shipped to GM. For calendar year 2025, GM surveyed suppliers to gain visibility in the smelters or refiners (SORs) in its supply chain, and surveying is underway for 2026.
- Engaging in the Responsible Minerals Initiative (RMI) that validates that SORs pass the Responsible Minerals Assurance Process (RMAP) through a risk-based approach of processes for responsible mineral procurement. Through RMI's Extended Reporting template (EMRT), we surveyed nearly 300 Cobalt, Mica, Lithium, Nickel, and graphite suppliers, with an 89% response rate.
- 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.
- Founding Member of 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:

- Annually requesting a subset of Tier I direct vehicle component suppliers complete the corresponding reporting templates for cobalt, mica and conflict minerals, including 3TG. These templates include the EMRT and the CMRT.
- Identifying and assisting with the disposition of cobalt and mica SORs and adding them to the RMI's database.
- Performing outreach to SORs that we are aware are not conforming to the RMI industry standards to encourage them to go through the RMI assurance program.



Training for Suppliers

Supplier training is an integral component to efforts to eradicate slavery and human trafficking from the supply chain. GM, through the Automotive Industry Action Group (AIAG) and Responsible Business Alliance (RBA), 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 and RBA 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.

GM SupplyPower is an internet portal used by GM to share information, including events, policies, guidelines, training, standards and reports, and best practices with suppliers, and includes a section devoted to sustainability. GM encourages 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 UNGPs, when GM or GM Canada are alerted to potential adverse human rights impacts, we investigate, and where necessary, we take appropriate action. This may include engaging 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. In some cases, GM may take further action up to and including termination of supplier relationships. Similarly, suppliers are expected 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 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. The 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 intended to be 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 GM's Board of Directors or Audit Committee of the Board, 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 GECC priorities and accomplishments and trends in Awareline submissions and investigations.

In 2025, GM received 7,455 reports to the Awareline; 5,609 were classified as allegations, with the remaining classified as suggestions, inquiries and other issues. GM tracks all reports of misconduct, whether through Awareline or another channel, in a case management system that allows GM to preserve a reporter's anonymity while facilitating efficient investigation, follow-up and compliance trend analysis.

Additionally, RBA, of which GM is a member, 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 providers of business sustainability ratings that has evaluated over 150,000 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, discrimination, harassment and health and safety. GM asks that suppliers participate in the EcoVadis platform in connection with their request for quotes. In 2025, 1,191 GM suppliers participated.

In parallel with developing action plans, GM built out management systems to enhance understanding, ownership and accountability over salient issues. Focusing on high-risk supply chains, in 2025, GM conducted a salient risk assessment of the battery supply chain, with mitigation measures being integrated into the program and broader strategy.

In 2024, GM initiated and built out a supplier audit program to further due diligence and ability to provide assurance that policies are followed. In 2025 GM also initiated a 3 year internal program for GM manufacturing to assess effectiveness of our management systems for respecting human rights with our assurance partner, LRQA. While we recognize that nearly all the potential impacts identified are by nature systemic and not limited to GM, GM Canada or even the automotive industry, we take seriously our responsibility to work to identify, prevent, mitigate and remediate potential human rights impacts to which GM or GM Canada may contribute.

Approval and Attestation

GM Canada's Board of Directors have approved this report.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name:

Title:

Date:

I have the authority to bind GM Canada