



## Supply Chain Due Diligence Policy

### Introduction

General Motors Company (GM) is committed to the pursuit of high standards for our supply chain. We strive to do business with parties that conduct business ethically, sustainably, and in compliance with the law, and our due diligence processes are designed to identify potential concerns within our supply chain in these respects. This policy articulates GM's internal practices with respect to its supply chain due diligence processes, for which we expect full cooperation from our suppliers, and is based on the OECD's Due Diligence Guidance for Responsible Business conduct. This policy applies to GM and its affiliates and subsidiaries in which GM owns more than 50%, as well as Joint Ventures where GM has managerial control.

### Due Diligence Overview

We embed responsible business conduct within our policies and management systems. This policy is the cornerstone of our strategy to help identify and address compliance risks, potential violations, and potential human rights and sustainability impacts within our supply chain.

We prioritize recurring evaluation and refinement of our due diligence strategies to remain effective and aligned with the evolving risk and dynamics of our global supply chain. We aspire to involve relevant internal and external stakeholders to enhance our due diligence practices and to solicit a wide range of perspectives that influence our risk assessment. This approach assists in aligning our supply chain operations with our social and environmental responsibilities.

### Risk Assessment

We take a risk-based approach to supply chain due diligence premised on a holistic, thoughtful and ongoing assessment of the potential risks that are relevant to our business and the communities in which our supply chain operates. It encompasses

working in coordination with other business units on the identification and assessment of potential compliance with laws, potential human rights impacts, and the sustainability and resiliency of our supply chain. To support this process, we employ a variety of tools that provide continuous, real-time insights and help inform our decision-making.

## **Risk Identification**

GM performs a risk assessment to evaluate potential areas of our supply chain that have the greatest risk to potential sustainability and human rights impacts within our supply chain. Risks are then prioritized based on their likelihood and impact, which we periodically update to support risk management strategies remaining effective and adaptive to new data and changes in the business environment. Internal and external data sources are utilized to ascertain country-specific and commodity-group risks, among others, and we utilize these risk identification activities to inform sourcing decisions as described below.

Supply chain visibility is key to proactively identifying potential sustainability and human rights impacts within our supply chain. We work cross-functionally and with our tiered suppliers to map our supply chain relationships, monitor supply chain disruptions, and help identify potential sustainability and human rights impacts worldwide.

## **Risk Analysis**

Supply chain risk analysis at GM involves a multi-faceted approach to evaluate identified risks, including assessing sector, activities, geography, and enterprise specific risks. The process provides insights into wide-ranging risk exposures and facilitates the detailed analysis of each identified risk. Cross-functional teams perform the assessment and communicate risk trends throughout GM's procurement function.

## **Prioritize Risks**

We apply analytical tools to assess the severity and likelihood of identified supply chain risks, prioritizing them accordingly. Risks are prioritized based on their likelihood and potential severity. Learnings about GM's risk exposure are integrated into our decision-making processes and influence supplier selection, and evaluations.

## **Prevention & Mitigation**

GM leverages the work done in our risk assessment process to help prevent, cease, and/or mitigate adverse impacts that may be in our supply chain.

## **Control Measures**

We initiate control measures to examine risks and respond to possible reports. As part of our sourcing process, we expect suppliers to comply with our Supplier Code of Conduct. We also request suppliers share their sub-tier supply chain mapping as well as detailed information about their sustainability and human rights due diligence programs and efforts through measures such as self-assessment questionnaires, audits, discussions and contract language to help drive transparency throughout our supply chain.

We engage in critical discussions to thoroughly evaluate and proactively address high risks, focusing on the key risks identified. An escalation process is in place to enforce mandatory measures within our supply chain when necessary.

## **Preventative Measures**

We foster the adoption of due diligence practices within our supply chain by communicating our expectations for best practices and monitor suppliers for their adoption and their efforts to extend these measures to sub-suppliers. Suppliers receive guidance and support through a variety of tools and access to a dedicated team assisting with due diligence inquiries. Training is extended to suppliers via comprehensive sessions, e-learning courses, and webinars.

The Supplier Resiliency Council and Supplier Sustainability Councils are comprised of representatives from key GM suppliers. Meetings with the Supplier Resiliency Council and the Supplier Sustainability Council foster an environment that enables dialogue on due diligence practices, addresses emerging risks, and develops collaborative strategies, among other valuable benefits.

## **Remedial Measures**

GM takes prompt responsive action when we obtain knowledge of a potential sustainability or human rights impact by one of our suppliers based on an ad-hoc risk assessment of the suspected adverse impact and its relationship to GM.

When we determine that our supply chain has caused or directly contributes to an identified adverse impact, GM takes appropriate actions to cease or prevent that contribution moving forward, and remedial options range from rectification to suspending or terminating business relationships depending on the severity of the impact. Where appropriate, we rely on collaboration with suppliers on remediation initiatives, and GM expects supplier commitment to and support for these processes, including in enacting corrective measures.

## Tracking Progress

GM strives for thorough oversight of its due diligence practices to effectively prevent or mitigate potential adverse human rights and sustainability impacts. Committee meetings comprised of representatives from cross-functional business units regularly review potential sustainability and human rights risks and impacts that may be found in our supply chain, with appropriate escalation of unresolved impacts to relevant leadership.

GM has monitoring systems in place that enable us to collect and analyze data on supply chain practices and compliance, and regular assessments of our supply chain partners help us to track progress to our goals. Periodic assessments of those systems help drive accountability and assist in identifying areas for improvement.

Our due diligence processes remain flexible, adapting to emerging risks, regulatory changes, and new insights. Regular reporting on the impacts of our due diligence measures is integral to this adaptive approach.

## Communicating How Impacts are Addressed

GM communicates regarding its impact, including in our annual Sustainability Report as well as several internationally aligned public disclosures.

Our Sustainability Report and additional disclosures are made public on our website.

By aligning our reporting with recognized standards and frameworks, we maintain comparability and consistency with industry practices, bolstering the credibility and utility of our disclosures.

## Cooperation

We have implemented a grievance mechanism for reporting concerns, providing a safe and confidential platform for employees, suppliers, and other stakeholders to raise concerns and report misconduct. Employees, suppliers, contractors, or others can report any incidents or concerns using GM's Awareline 24 hours per day, 7 days per week by phone, web, or email.

We do not tolerate retaliation against anyone for raising a concern in good faith as reflected in our non-retaliation policy. Our non-retaliation expectations are made clear to our suppliers in our Supplier Code of Conduct.

## Conclusion

We seek to be steadfast in our ongoing assessment and refinement of our supply chain compliance and due diligence work. We recognize that efforts towards exemplary due diligence are foundational to responsible business practice, and we seek to integrate these principles into our supply chain.