



HUMAN RIGHTS STATEMENT

2025

INTRODUCTION

We are committed to upholding and respecting human rights.

General Motors Company (GM)'s approach to human rights is grounded in our understanding of our potentially salient issues and our company-wide commitments, which include expectations for our suppliers and own operations.

In 2025 we completed two refreshed saliency assessments to analyze a broad spectrum of potential human rights and labor-related risks within our own operations and our supply chain. These assessments helped us gain valuable insights into potential risks and impacts at the facility level and have informed our human rights strategic priorities and focus areas.

We continue to review and evolve our approach to human rights to remain aligned with risks salient to our business and anticipate refining our human rights due diligence work.

POLICIES

GM's Human Rights Policy establishes how we define, approach, govern, and support universal human rights and the dignity of people throughout our operations, the communities in which we operate, and our global supply chain. Together with our GM Code of Conduct and our Supplier Code of Conduct, the Human Rights Policy enumerates our expectations with respect to our own operations and our supply chain.

The Human Rights Policy includes a commitment to respect internationally recognized human rights. It is guided by the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs), the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, OECD Due Diligence Guidance for Responsible Business Conduct, OECD Due Diligence Guidance for Responsible Minerals, and the UN Universal Declaration of Human Rights, as well as the International Labour Organization's Core Conventions against forced labor, child labor, discrimination and harassment, and protecting freedom of association and the right to collective bargaining. GM's robust Supplier Code of Conduct further affirms our commitment to respecting human rights throughout our supply chain and articulates the high standards to which we hold suppliers. The GM Code of Conduct, Supplier Code of Conduct, and our Human Rights Policy – along with our Anti-Slavery and

Human Trafficking Statement, Responsible Materials Policy, and Conflict Minerals Policy – form the backbone of our human rights compliance program and make clear that we expect our suppliers and business partners to make their own commitments on human rights. In accordance with our Supplier Code of Conduct, suppliers should cascade similar expectations through their own supply chains.

We require all eligible salaried employees to complete training annually on GM’s Code of Conduct, Winning with Integrity, which includes a module on human rights issues relevant to GM. In 2025, we achieved a 100% completion rate across our salaried employees for this course. We deploy new or refreshed content every year and will keep developing more advanced training materials for specific functions as part of our human rights program strategy.

HUMAN RIGHTS STRATEGIC PRIORITIES AND FOCUS AREAS

Strategic Priorities	Focus Areas			
Act on salient issues	Build and strengthen action plans for identified salient issues	Engage affected stakeholders	Develop metrics, assess baseline, track progress	
Ongoing implementation of systems for human rights due diligence (both proactive and reactive)	Strengthen systems to identify and manage risks	Embed capacity and enhance expertise in human rights	Communicate progress through reporting and disclosure	Perform due diligence specific to high-risk commodities
Manage human rights impacts related to specific business models	Assess and address human rights risks related to Electric Vehicles (EVs)	Build and use leverage with joint ventures (JVs) to assess and address human rights risks	Enhance human rights due diligence in select high-risk geographies	

GOVERNANCE AND MANAGEMENT

We take our responsibilities with respect to human rights seriously and address human rights issues at the highest levels of GM. Governance includes oversight from the GM Board of Directors, with cross-functional implementation across the company. As outlined in its charter,

the Board's Governance and Corporate Responsibility Committee (GCRC) has primary oversight responsibility for GM's sustainability program, which includes human rights.

The Chief Sustainability Officer (CSO) leads GM's enterprise-wide sustainability strategy and efforts. The CSO ensures alignment with business units to enhance integration and execution, sets sustainability targets, monitors progress against those targets, and reports periodically to the GCRC.

COMMUNICATING OUR COMMITMENTS

We are committed to upholding human rights across our operations and supply chain. We aim to have our entire global workforce understand our human rights commitments and to be aware of our Human Rights Policy. To achieve this, we developed our global communications strategy, which delivers critical information through GM's internal channels, as well as our supplier communications channels. The Human Rights Policy is available in nine languages, reflecting our primary operating regions, to promote ease of access and understanding.

HUMAN RIGHTS DUE DILIGENCE

GM recognizes that certain individuals and communities may face heightened risk of adverse human rights impacts or barriers to remedy due to marginalization, vulnerability, or other circumstances. This may include Indigenous Peoples, children, and persons with disabilities, among others, and we consider these factors as part of our human rights due diligence and stakeholder engagement approach.

To effectively prevent and mitigate potential negative impacts to people, the UNGPs define how to identify what those potential impacts could be and prioritize them in a process known as a human rights saliency assessment, or a human rights impact assessment.

SALIENT HUMAN RIGHTS RISKS IN OUR OPERATIONS

A periodic human rights saliency assessment is a key input to GM's approach to human rights, recognizing that potential impacts and specific risks – as well as the efforts needed to address them – evolve over time based on both external and internal factors. In 2025, GM worked with a third-party provider, LRQA, to update our assessment of salient human rights risks in our own operations. The assessment was intended to help identify where our activities may be associated with the most significant potential impacts on people and to inform the continued development of our due diligence efforts.

Aligned with the UNGPs, the assessment looked across four stakeholder groups and a wider set of issue categories and then prioritized them by activity and stakeholder group. LRQA reviewed

public and internal materials, incorporated stakeholder input, and assessed potential risks based on severity and likelihood. The process also included validation with our stakeholders to help refine and prioritize the results.

Through interviews with key internal personnel and analysis regarding automotive companies like GM and geographies relevant to GM's business, the assessment considered potential impacts to direct workers, third-party workers, affected communities, and customers. As a result, the assessment highlighted the following salient risks:

- Adequate wages
- Child labor
- Freedom of association
- Non-discrimination
- Occupational health and safety
- Workplace harassment
- Working hours
- Privacy
- Community health and safety
- Indigenous People's rights
- Land rights

Nearly all the potential salient risks we identified are systemic to global companies and not specific to GM or, in some cases, even the automotive industry. Results from the assessment reflect inherent pre-mitigation risk and are not a finding of fact, a supplier audit, or an assessment of the effectiveness of GM's existing policies and procedures. Our approach to salient risks in our own operations is informed by this analysis and we are taking steps to address issues as appropriate.

SALIENT HUMAN RIGHTS RISKS IN THE SUPPLY CHAIN

GM also assesses salient human rights risks in its supply chain, informed both by our understanding of and leverage with our global supply chain and our ongoing human rights due diligence process. We draw on desktop research, industry analysis, stakeholder engagement, internal cross-functional input, and information from supplier screening, risk assessments, and audit activities. We use this process to identify, assess, and prioritize the most salient actual and potential adverse human rights impacts connected to our supply chain. Risks we have identified as most salient in our supply chain – based on likelihood and severity – include child labor, discrimination, environmental impacts, forced labor, freedom of association, health and safety impacts, livelihood and wages, and working conditions.

To address these salient risks, GM continually reviews higher-risk supplier categories, supply chain segments, geographies, and commodities that may warrant enhanced due diligence or additional oversight. These risk-informed reviews help determine where heightened controls, deeper engagement, or further assessment may be appropriate.

Where relevant to the nature of the supplier relationship and the risks presented, GM considers adverse human rights impacts as part of its supplier due diligence and sourcing decision-making processes before entering into contracts. In 2025, GM completed a salient human rights risk assessment of our battery supply chain, again with support from LRQA. The assessment profile included human rights risk across key stages of the battery value chain—from mining and refining materials production, cell manufacturing, and end-of-life management—with a focus on GM’s top sourcing countries of Africa, Asia, Latin America, North America and parts of Europe. It drew on GM documents, stakeholder input, desktop research, and LRQA’s EiQ analytics to assess potential impacts on workers, communities, and the environment.

The assessment considered inherent, pre-mitigation risks relevant to workers, communities, and the environment, including child labor, forced labor, freedom of association, non-discrimination, occupational health and safety, working hours, community health and safety, Indigenous Peoples’ and land rights, and environmental impacts such as air pollution, water use and pollution, biodiversity, and soil impacts.

Results from the assessment reflect inherent pre-mitigation risk and are not a finding of fact, a supplier audit, or an assessment of the effectiveness of GM’s existing policies and procedures.

ADDRESSING SALIENT HUMAN RIGHTS RISKS: CHILD LABOR AND FORCED LABOR

GM actively identifies and assesses its human rights risks and impacts, prioritizing salient issues through stakeholder engagement, including on issues related to vulnerable groups.

To this end, GM pays special attention to risks related to child labor and forced labor both in our operations and in our supply chain. We have implemented appropriate policies and procedures for addressing potential child labor and forced labor concerns in our operations and we periodically conduct training and other awareness activities with our internal workforce and our suppliers consistent with our Supplier Code of Conduct.

We expect suppliers to abide by the Supplier Code of Conduct, including the forced labor section, at all tiers of the supply chain. We expect our first-tier suppliers to cascade our Supplier Code of Conduct to all lower tiers so that all tiered suppliers will commit to preventing

forced labor. Building on this expectation, we prioritize mapping high-risk supply chains to raw materials.

We conduct audits at Tier I and sub-tier sites to assess working hours as well as the presence of foreign migrant workers, withholding wages and documents, and recruitment fees.

To strengthen our supply chain due diligence, we are a member of the Responsible Business Alliance (RBA). We use the RBA's risk assessment and auditing tools to further our human rights monitoring efforts, including by identifying high-risk suppliers for whom we engage to remediate risk.

Where we find non-conformances, we work with RBA and suppliers to develop corrective action plans and monitor them until the non-conformance is remedied. If findings cannot be remediated using our leverage, we will escalate up to and including termination of the contract.

PREVENTING AND MITIGATING IMPACTS

We work to recognize and address potential adverse impacts and take steps to prevent, mitigate, and where necessary, remediate those impacts. We rely on training as a tool to prevent human rights-related issues from arising, as well as robust reporting and internal review mechanisms to rapidly identify and respond to issues.

GM's confidential, third party-operated reporting tool, the Awareline, is available to employees, suppliers, contractors, and others to report any incidents or concerns. It is accessible at any time to everyone, including our workers, suppliers, suppliers' workers, and other external stakeholders. Reports can be made anonymously, and concerns are reviewed through established processes designed to support impartial intake and follow-up.

Through our Supplier Code of Conduct, we expect suppliers to share information about the GM Awareline with their workers or establish their own mechanism. GM monitors supplier alignment with our Supplier Code of Conduct through a combination of risk-based due diligence tools, supplier self-assessments (92% of spend with active Ecovadis scorecards), ongoing monitoring, grievance channels, and audits.

If GM identifies actual or potential non-conformance with our Supplier Code of Conduct, we seek to understand the issue, review written assessments, implement on site audits if necessary, close corrective actions, and monitor progress toward timely remediation. Depending on the nature and severity of the issue, GM may escalate concerns internally, require improvement plans, conduct follow-up monitoring, and consider the impact of unresolved issues on future sourcing decisions.

Where gaps are identified, GM works with suppliers through a formal corrective action process designed to address root causes, support remediation, and reduce the likelihood of recurrence. Corrective actions are reviewed through supporting evidence and follow up, and GM may escalate serious or unresolved issues, including through impacts on future sourcing decisions, where appropriate. If corrective actions are not closed appropriately or the issue continues, GM will employ further escalated action up to re-sourcing.

Complementing these monitoring and investigation processes, GM also uses a risk-based responsible sourcing audit program to assess supplier practices more systematically. Supplier risk segmentation utilizes internal and external data points such as spend, country, commodity, Ecovadis scores, past conformance to the Supplier Code of Conduct, to determine supplier's risk profile.

The program includes proactive social compliance audits of higher-risk suppliers identified through periodic segmentation, as well as reactive audits or investigations initiated in response to confirmed or suspected Supplier Code of Conduct concerns. Depending on the circumstances, audits may include onsite observation, document and record review, and confidential worker interviews. Audits may assess labor practices, health and safety, environmental management, business ethics, and management systems. Where gaps are identified, suppliers are expected to participate in a corrective action process designed to address root causes, support remediation, and reduce the likelihood of recurrence.

ENGAGING STAKEHOLDERS

Stakeholder engagement is an important aspect of our approach to human rights. Hearing directly from the people our business may impact gives us critical input for developing effective policy. These conversations build trust and provide invaluable opportunities to learn and to co-create potential solutions.

In 2025, GM completed 6 sessions of the Ethical Insights Series, designed to empower and educate GM suppliers on the importance of ethical sourcing practices.

The sessions are intended to enhance awareness of risks and the need to develop individualized programs. To enhance the learning experience, we invited guest speakers and experts in their respective fields to present to our suppliers. The live Q&A segment allowed suppliers to ask questions and engage directly with the experts, fostering a deeper understanding of ethical sourcing practices.

Recognizing the importance of this training, we have made it available as a course for all GM employees. This initiative not only equips our employees with the knowledge necessary to uphold our ethical sourcing commitments but also fosters a culture of awareness and

accountability throughout the organization. To manage engagement, we established the Location and Ethical Sourcing Risk Board, which brings together supply chain professionals and leadership, trade, legal, resiliency and responsible sourcing teams. This collaborative effort provides comprehensive oversight of the program and facilitates the review of high-risk suppliers.

COLLABORATIONS

GM collaborates with multiple nongovernmental organizations (NGOs) that specialize in addressing issues related to child labor, Indigenous Peoples, and forced labor.

These collaborations provide GM with valuable insights into on-the-ground challenges faced by communities, enabling us to better understand the complexities of these issues. Additionally, these NGOs often facilitate communication with local communities, helping to promote the inclusion of their voices in our decision-making processes.

Moreover, many of these NGOs conduct independent and frontline research within industries, providing us with valuable insights that strengthen our programs.

RESPONSIBLY SOURCED MINERALS

Many advanced technologies, including EVs, depend on minerals and materials that may originate from conflict-affected and high-risk areas (CAHRAs), or otherwise present elevated risk of adverse human rights impacts. In response, we prioritize responsible sourcing practices and conduct supply chain due diligence to help promote ethical and sustainable operations.

To identify and address human rights risks, we apply a risk-based approach to identify and address adverse human rights impacts that may be associated with their extraction, processing, transport, and trade through our Responsible Materials Program and our Conflict Minerals Program, both of which are aligned with OECD Due Diligence Guidance.

GM expects relevant suppliers to undertake due diligence consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs, including its applicable supplements, and to cascade those expectations through their own supply chains as appropriate. We use supplier disclosures, engagement, and third-party frameworks to support implementation of these expectations and to help identify and address risks in mineral supply chains.

Our approach begins with setting clear expectations for suppliers through our policies, Supplier Code of Conduct, and the frameworks we support. For example, we actively engage with and support the Initiative for Responsible Mining Assurance (IRMA) and The Responsible Minerals Initiative (RMI). IRMA promotes responsible mining practices through comprehensive third-

party assessments and certifications. RMI provides third-party assessments and certifications to evaluate that smelters and refiners source minerals responsibly. We leverage RMI's Responsible Minerals Assurance Process (RMAP), which applies a risk-based framework to evaluate mineral processors. RMI's standards help enhance transparency and support additional due diligence. We encourage supplier alignment with these standards.

These frameworks, along with our policies, form the foundation of our supplier due diligence strategy. GM engages directly with extractive companies and other upstream value chain participants to advance responsible sourcing objectives. Additionally, third-party assessments help us work with suppliers and partners whose practices reflect our values of integrity, responsible sourcing, and sound supply chain management. IRMA and RMI also facilitate cross-industry collaboration to share best practices and encourage continuous improvement in mining operations.

MULTI-STAKEHOLDER ENGAGEMENT

We utilize RMI's standardized reporting templates, including the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT), completed by a subset of Tier 1 direct vehicle component suppliers. These templates cover minerals such as cobalt, mica, lithium, nickel, natural graphite, and the conflict minerals tin, tungsten, tantalum, and gold (3TG).

When suppliers report use of non-conformant smelters or refiners (SORs), we conduct smelter-level analysis and request corrective actions. In certain cases, we initiate targeted outreach campaigns to encourage removal of high-risk entities. Unresolved concerns may be escalated internally, and continued non-alignment with our expectations may influence future sourcing decisions. Similarly, if IRMA or other third-party assessments identify areas for improvement, we engage those suppliers to develop and implement corrective action plans and maintain ongoing dialogue to monitor progress.

Beyond direct supplier engagement, we actively support efforts that strengthen accountability, compliance, and due diligence throughout the supply chain. As part of our engagement with RMI, we participate in subgroups such as the Smelter Engagement Team to encourage greater adoption of the RMAP among non-conformant SORs that have not yet met conformance standards.

We also contribute to multiple funds that support responsible critical mineral sourcing at key points of the value chain as part of broader industry efforts. Through financial support for RMI member initiatives, we contribute to broader industry efforts to strengthen responsible critical mineral sourcing, including upstream due diligence, independent in-region assessments, and smelter and refiner audits.

We are committed to continuous improvement and responsible sourcing—both upstream, where we are closer to the mining activities, and downstream, where we continue to promote robust due diligence.