

**Corporate Human Rights Benchmark  
2020 Company Scoresheet**

**Company Name** General Motors Corporation (GM)  
**Industry** Automobiles  
**Overall Score (\*)** 21.1 out of 100

Theme Score	Out of	For Theme
1.8	10	A. Governance and Policies
1.4	25	B. Embedding Respect and Human Rights Due Diligence
3.8	15	C. Remedies and Grievance Mechanisms
5.3	20	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations
3.9	10	F. Transparency

(\*) While other sectors are being measured against a reduced set of CHRB Core UNGP Indicators this year the Automotive Manufacturing sector is being measured against the full CHRB Methodology as it is the first year that the sector has been analysed.

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

**Detailed assessment**

**A. Governance and Policies (10% of Total)**

**A.1 Policy Commitments (5% of Total)**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: UNGC principles 1 &amp; 2: The Company became a signatory to the UN Global Compact in December, 2015. [Human Rights Policy, N/A: <a href="https://www.gmsustainability.com">gmsustainability.com</a> &amp; Letter of Commitment UNGC, 02/11/2015: <a href="https://www.amazonaws.com">s3-us-west-2.amazonaws.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs: The Company indicates that its Human Rights policy 'also acknowledges internationally recognized human rights principles and is informed by the United Nations Guiding Principles on Business and Human Rights'. However, 'acknowledge' is not considered a formal commitment following CHRB wording criteria. [Human Rights Policy, N/A: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: ILO Core</li> <li>Met: UNGC principles 3-6: In the Letter of Commitment to the UN Global Compact, the Company expresses 'Gm's support of the Global Compact's ten principles'. [Letter of Commitment UNGC, 02/11/2015: <a href="https://www.amazonaws.com">s3-us-west-2.amazonaws.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Explicitly list ALL four ILO for MO suppliers: The Company indicates that it expects its 'suppliers and other business partners to comply with laws that promote safe working conditions and individual security; laws prohibiting forced labor; prohibitions on the employment of underage children; prohibitions on human trafficking; prohibitions on harassment and unlawful discrimination; In relation to freedom of association and collective bargaining, the Company indicates that 'suppliers will comply with applicable laws that recognize and respect the rights of employees to freedom of association and collective bargaining'. However, given that the Company is establishing requirements in the context of 'applicable laws', it is not clear whether it requires suppliers to provide alternative or parallel mechanisms in those locations where the exercise of these rights is restricted under local law. [Human Rights Policy, N/A: <a href="https://www.gm.com/sustainability">gmsustainability.com</a> &amp; Supplier Code of Conduct, N/A: <a href="https://www.investor.gm.com">investor.gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: The Company indicates that 'We comply and expect our suppliers and other business partners to comply with laws that promote safe working conditions and individual security; laws prohibiting forced labor; prohibitions on the employment of underage children; prohibitions on human trafficking; prohibitions on harassment and unlawful discrimination; and laws that ensure freedom of association and the right to engage in collective bargaining'. However, given that the Company is committing in the context of 'laws' on freedom of association and collective bargaining, it is not clear whether it is committed to provide alternative or parallel mechanisms in those locations where the exercise of these rights is restricted under local law. [Human Rights Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company indicates that 'We comply and expect our suppliers and other business partners to comply with laws that promote safe working conditions'. [Human Rights Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> <li>• Met: H&amp;S applies to MO suppliers: The Company indicates that it expects its 'suppliers and other business partners to comply with laws that promote safe working conditions'. [Human Rights Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Working hours for workers</li> <li>• Not met: Working hours for MO suppliers: The Company indicates that 'Suppliers will comply with applicable laws regulating work hours'. However, it is not clear the expectation requires respecting the ILO conventions on working hours. No requirements found in relation to regular working week hours and minimum breaks. [Supplier Code of Conduct, N/A: <a href="https://www.investor.gm.com">investor.gm.com</a>]</li> </ul>
A.1.3.MO.a	Commitment to responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Responsible mineral sourcing in conflict areas: The Company indicates that 'General Motors is committed to sustainable and responsible sourcing of goods and services throughout our supply chain. GM supports the human rights goals reflected in the adoption of conflict mineral due diligence requirements included in the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010'. [Conflict Minerals Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> <li>• Met: Based on OECD Guidance: The Company indicates that 'To obtain information regarding the source and chain of custody of 3TG, we conducted due diligence through our direct suppliers based on the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas published by the OECD'. [2018 SD Form, 31/05/2019: <a href="https://www.investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: Requires responsible mineral sourcing from suppliers: The Company indicates that 'we encourage our suppliers to source responsibly with validated conflict free smelters, wherever possible, to increase our level of confidence that the components in our vehicles and products contain conflict free minerals'. However, it is not clear whether there is a formal requirement to responsible sourcing for suppliers'. As indicated, wording refers to 'encourage' suppliers to source validated conflict free smelters. [Conflict Minerals Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Requires suppliers to follow the OECD Guidance: The Company states that 'We require our suppliers to engage in supply chain due diligence to improve understanding and reporting of component content supplied to GM'. However, it is not clear the Company requires its suppliers to follow the OECD Guidance. [Conflict Minerals Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> <li>• Not met: Suppliers expected to make similar requirements of their suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.MO.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Women's Rights: The Company indicates that 'We support women's rights and economic inclusion, including support for equal pay'. [Human Rights Policy, N/A: <a href="https://www.gm.com/sustainability">gmsustainability.com</a>]</li> <li>• Not met: Children's Rights: The Company indicates that it has 'prohibitions on the employment of underage children'. However, no evidence found of a publicly available statement of policy committing it to respecting children's rights. [Human Rights Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights: The Company indicates that 'Suppliers will not use child labor'. Moreover, 'Suppliers will not discriminate on the basis of gender'. However, no evidence found of suppliers' being expected to commit to respecting women's rights or children's rights or migrant workers' rights. [Supplier Code of Conduct, N/A: <a href="https://investor.gm.com">investor.gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to stakeholder engagement: The Company indicates that 'We support the communities in which we operate and are committed to engage with our stakeholders taking into account their views as we conduct our business'. [Human Rights Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement: The Company indicates that 'For the past 10 years, our global sustainability team also has engaged with stakeholders through Ceres, a nonprofit organization advocating for corporate sustainability leadership. Recently, this engagement has focused on specific topic areas, such as human rights, when GM has needed to garner insights and perspective from subject matter experts and other third parties.' However, it is not clear that the Company regularly engages with affected stakeholders and/or their legitimate representatives in the development or monitoring of its human rights approach. [2019 Sustainability Report, 2020: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> </ul>
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies: The Company indicates that 'though we prefer that employees raise concerns internally, we comply with laws that prohibit retaliation, for example, for raising concerns or complaints to government officials or through courts'. However, no evidence found of a commitment to remedy which recognises that this should not obstruct access to other remedies. [Code of Conduct 2020 update, N/A: <a href="https://investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with MO suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs): The Company indicates that 'GM will not tolerate retaliation against anyone who in good faith reports a concern about GM's operations'. However, this indicator looks for a broader commitment to not tolerate threats nor retaliation against anyone who opposes the Company due to human rights (human rights defenders). [Non-Retaliation Policy, N/A: <a href="https://www.gm.com/sustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Expects MO suppliers to reflect company HRD commitments: The Company indicates that 'suppliers will provide an adequate mechanism for their employees to report integrity concerns, safety issues and misconduct without fear of retaliation (...). Suppliers will prohibit retaliation'. However, it is not clear The Company expects its suppliers to neither tolerate nor contribute to threats, intimidation and attacks against human rights defenders in relation to suppliers' operations in general, not only regarding grievance mechanisms. [Supplier Code of Conduct, N/A: <a href="https://investor.gm.com">investor.gm.com</a>]</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: CEO or Board approves policy: No evidence found indicating that the Company's human rights policy commitments are approved by the Board or the CEO. [Human Rights Policy, N/A: <a href="https://gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Board level oversight for HRs: The Company indicates that 'The Board is committed to overseeing the company's integration of environmental, social and governance (ESG) principles throughout the enterprise'. However, no evidence found of a Board member or Board committee is tasked with specific governance oversight of one or more areas of respect for human rights. [2019 Sustainability Report, 2020: <a href="https://gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs: The Company indicates that 'The Board is committed to overseeing the company's integration of environmental, social and governance (ESG) principles throughout the enterprise. [...] Additionally, ESG oversight includes frequent ESG strategic discussions by the Board's Governance and Corporate Responsibility Committee. This Committee is charged with overseeing: [...] Risks related to the sustainability of our operations.' While the Sustainability Report contains a section about Supporting Supplier Responsibility, and this in turn contains a subsection about human rights, it is not clear the process it has in place to discuss and address human rights issues at Board level or how the Board or a Board committee regularly reviews the Company's salient human rights issues. [2019 Sustainability Report, 2020: <a href="https://gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion</li> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Incentives for at least one board member: The Company indicates in its Sustainability Report that 'The Compensation Committee factors ESG performance related to strategic goals, which account for 25 percent of the short-term incentive plan (STIP) for each named executive officer.' Among these executive officers is Mary T. Barra, Chairman and CEO. The STIP includes 'strategic goals', one of which is related to health and safety. The 2019 performance highlights include: 'Continued to drive enterprise engagement towards a safety-first culture resulting in zero fatalities and reductions in permanently disabling injuries and lost workdays'. [2019 Sustainability Report, 2020: <a href="https://gmsustainability.com">gmsustainability.com</a> &amp; 2020 Proxy Statement, 16/06/2020: <a href="https://investor.gm.com">investor.gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: At least one key MO HR risk, beyond employee H&amp;S: No evidence could be found of health and safety in the supply chain/communities being taken into account as a financial incentive to board members.</li> <li>• Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions</li> <li>• Not met: Senior responsibility for HR: The Company has a Sustainability Team. However, no evidence found of senior manager(s) roles responsible for relevant human rights issues within the Company. [2019 Sustainability Report, 2020: <a href="https://gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: As indicated above, there is a sustainability team. No further details found describing day-to-day implementation of human rights commitments.</li> <li>• Not met: Day-to-day responsibility for MO in supply chain</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Senior manager incentives for human rights: The Company indicates in its Sustainability Report that 'The Compensation Committee factors ESG performance related to strategic goals, which account for 25 percent of the short-term incentive plan (STIP) for each named executive officer.' Among these executive officers are the CEO, the CFO, the President and various VPs. The STIP includes 'strategic goals', one of which is related to health and safety. The 2019 performance highlights include: 'Continued to drive enterprise engagement towards a safety -first culture resulting in zero fatalities and reductions in permanently disabling injuries and lost workdays'. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a> &amp; 2020 Proxy Statement, 16/06/2020: <a href="https://investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: At least one key MO HR risk, beyond employee H&amp;S: No evidence could be found of health and safety in the supply chain/communities being taken into account as a financial incentive to senior management.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR risks is integrated as part of enterprise risk system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions</li> <li>• Not met: Communicates its policy to all workers in own operations: The Company indicates that 'Every year, all eligible salaried employees are required to review the Code of Conduct'. The Code of Conduct discloses the Company's human rights commitments. However, it is not clear it is available in local languages. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2</li> <li>• Met: Requiring MO suppliers to communicate policy down the chain: In the Sustainability Report, the Company discloses 'Our Supplier Code of Conduct and purchase contract Terms and Conditions set forth expectations for ethical social, business and environmental practices. By choosing to do business with GM, our suppliers accept our purchase contract Terms and Conditions. Compliance is mandatory. Our Terms and Conditions clearly state our prohibition against any use of child labor or any other form of forced or involuntary labor, abusive treatment of employees or corrupt business practices in the supplying of goods and services to us. Furthermore, our contracts lay out expectations for lawful compliance with data protection and privacy, wages, hours and conditions of employment, subcontractor selection, anti-discrimination, occupational health and safety and motor vehicle safety. 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. [...] In addition, suppliers are asked to confirm via the survey that they: Have company business practices consistent with GM's Supplier Code of Conduct or a similar code of conduct published by their company. [...] Have shared GM's Supplier Code of Conduct or a similar code of conduct published by their company with their suppliers. Have a safety policy that is consistent with the principles set forth in GM's Supplier Code of Conduct.' The Company indicates in the Supplier Code of Conduct that 'GM expects that its suppliers will cascade similar expectations through their own supply chains'. [Supplier Code of Conduct, N/A: <a href="https://investor.gm.com">investor.gm.com</a> &amp; 2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: As above, the Terms and Conditions contain human rights commitments, and are contractually binding. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Including on MO suppliers</li> </ul>
B.1.5	Training on Human Rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Trains all workers on HR policy commitments</li> <li>• Not met: Trains relevant MO managers including procurement: The Company indicates that 'GM, through AIAG, provides training to its suppliers and employees regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other participating AIAG auto company members, all of which contribute to developing the content of the training. Training participants review the areas of child labor, forced labor, freedom of association, harassment and discrimination, health and safety, wages and benefits, and working hours. (...) GM provides training to its employees in the supply chain and supplier quality functions who are responsible for physically attending supply chain facilities'. However, it is not clear whether this includes procurement managers. [Anti-Slavery and Human Trafficking Statement, N/A: <a href="http://gm.com">gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments</li> <li>• Not met: Monitoring MO suppliers: The Company indicates that 'GM periodically conducts supplier compliance surveys to confirm compliance. This certification process supports GM's efforts to verify its product supply chain and to evaluate the risk of human trafficking and slavery. GM has not historically conducted third party verification of its supply chain, nor does GM audit suppliers' compliance with standards relating to human trafficking and slavery. (...) GM requires its direct first tier suppliers to validate the component parts for which GM contracts and to also validate the processes used by the supplier to manufacture the parts. This validation process is to confirm that the parts and the processes used by the supplier satisfy relevant quality and manufacturing criteria. Through this validation process, GM employees and contractors are able to assess the risk of slavery and human trafficking associated with the supplier's manufacturing operations'. However, no details found of active monitoring of the supply chain for compliance with human rights policies. As indicated, evidence seems to focus in surveys that suppliers file to confirm compliance. [Anti-Slavery and Human Trafficking Statement, N/A: <a href="http://gm.com">gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: In the context of zero tolerance for retaliation, the Company indicates, in its Code of Conduct, that 'We will investigate the matter and take corrective action'. Also, in its Supplier Code of Conduct, the Company states that 'Suppliers will be able to demonstrate compliance with this Code upon our request and will take any action to correct any non-compliance'. However, it is not clear the Company's corrective action process(es) and numbers of incidence, regarding non-compliance with its human rights policy commitment. [Code of Conduct 2020 update, N/A: <a href="http://investor.gm.com">investor.gm.com</a> &amp; Supplier Code of Conduct, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of MO supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects MO selection of suppliers: The Company indicates that 'We are careful to select third parties who are committed to treating all workers with dignity and respect'. Also, in its Code of Conduct, the Company states that 'When selecting third parties, practice appropriate due diligence. Evaluate potential third parties based on legitimate business criteria, such as: Safety; GM's needs; Cost; Quality; Services offered; Availability; Reputation and integrity'. Lastly, 'Selecting a partner that has a history of engaging in human rights abuses is against GM's values and could put our company at risk'. However, it is not clear how human rights performance is taken into account in the identification and selection of potential business relationships. Evidence seems to focus in negative screening. [Code of Conduct 2020 update, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>• Met: HR affects on-going MO supplier relationships: The Company indicates that 'Compliance within our supply chain is mandatory (...). When suppliers act in a noncompliant manner, they may lose current work, future opportunities and/or their contract can be terminated'. [2018 SR, 20/06/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Working with MO suppliers to improve performance: The Company indicates that ‘Across the globe, we hold various webinars and provide external training to improve supplier operations, primarily in the areas of environmental management, workplace conditions, ethics and human rights’. However, no example of the work done found. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: The Company indicates that ‘Our success depends on relationships inside and outside the company. This core value drives engagement with our stakeholders, who we have identified as customers, (...) employees, both current and potential new talent; suppliers, Tier I and beyond; dealers and dealer councils; communities in which we operate; governments at the national, state/provincial and local levels; and environmental and social nongovernmental organizations (NGOs). (...) Brand marketing, investor relations, global purchasing, human resources, labor relations and government relations are some of the GM functions that engage stakeholders on a regular basis to understand and address concerns, as well as to advance social and environmental goals. Forms of engagement include, but are not limited to, quantitative consumer research studies, stakeholder focus groups, congressional testimony, blog posts and community meetings’. However, it is not clear how the Company has identified affected and potentially affected stakeholders with whom to engage and engaged in last two years (including human rights). No further details found in latest sustainability report. [2018 SR, 20/06/2019 &amp; 2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in MO SC engaged: The Company indicates that ‘GM engages its direct suppliers, employees and contractors, and is deeply involved in industry wide activities through organizations such as Automotive Industry Action Group (“AIAG”), including training development, funding, and identification of high-risk areas, in addition to other activities, to help eliminate slavery and human trafficking from GM’s supply chain’. However, it is not clear how specifically engages with workers in the supply chain (including frequency and triggers) [Anti-Slavery and Human Trafficking Statement, N/A: <a href="https://www.gm.com">gm.com</a>]</li> <li>• Not met: Communities in the MO SC engaged: The Company indicates that ‘GM also encourages suppliers to work closely with local communities to implement projects and strategies that improve the community and those who live there’. However, it is not clear that the Company engages with local communities in its supply chain. [Supplier Code of Conduct, N/A: <a href="https://investor.gm.com">investor.gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company’s actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: ‘Over the course of the year ahead, we intend to conduct an initial human rights saliency assessment in order to more precisely determine how our operations and activities may adversely impact people and communities. Based on the results of this assessment, we aim to work across the business to start establishing new — or integrate into existing — processes for identifying particular sites, geographies and/or demographics that may be at higher risk so that we may be more proactive in preventing issues from arising in the first place.’ However, no evidence could be found of this process being started. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Identifying risks in MO suppliers: The Company indicates that ‘Over the past few years, we have developed a robust in-house, customized supply chain visibility tool, which integrates GM plants, Tier I suppliers, known Tier II suppliers and logistics nodes. [...] Supply chain risks are managed through our broader risk management functions and processes. All identified key risks are assessed, updated and reviewed by senior leaders at least twice a year’. However, no description of the process(es) to identify which are its human rights risks and impacts in supply chain found, not clear if current process refers to compliance monitoring. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Triggered by new circumstances</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context): The Company indicates that 'GM requires its direct first tier suppliers to validate the component parts for which GM contracts and to also validate the processes used by the supplier to manufacture the parts. This validation process is to confirm that the parts and the processes used by the supplier satisfy relevant quality and manufacturing criteria. Through this validation process, GM employees and contractors are able to assess the risk of slavery and human trafficking associated with the supplier's manufacturing operations'. However, this indicator looks for evidence of how the Company assess its general exposure to human rights risks and impacts, rather than determining each specific supplier's risk. Nothing further found in latest Sustainability Report. [2018 SR, 20/06/2019 &amp; 2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including in MO supply chain: The Company indicates 'Our Global Crisis Management approach has significantly improved our response to disruptive events in the supply chain through the use of innovative tools and real-time data analysis. We monitor for both catastrophic events (e.g., earthquakes, hurricanes) and isolated disruptions (e.g., factory fires, labor strikes), reporting all potential impacts to our Command Center's Global Crisis teams for supplier follow-up. [...] Risk scores are provided to the Purchasing team, and are factored into the sourcing process and support mitigation plan development for high-risk areas.' However, no description found of its global system to take action to prevent, mitigate or remediate its salient human rights issues in the supply chain. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Example of Actions decided</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: To be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1</li> <li>• Not met: Comms plan re assessing risks: To be awarded this indicator, the Company has to achieve a full score in B.2.2</li> <li>• Not met: Comms plan re action plans for risks: To be awarded this indicator, the Company has to achieve a full score in B.2.3</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including MO suppliers: To be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>



## C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company list various tools to raise concerns, among them the Awareline: 'It's operated by an independent third party and is available 24/7, from any location around the globe'. [Code of Conduct 2020 update, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Number grievances filed, addressed or resolved: The Company indicates that 38% of reports to the Awareline fell into the category of Human Resources, Diversity, and Workplace Respect, while 26% had to do with Environment, Health and Safety. However, it is not clear the number of grievances about human rights issues filed, and ether addressed or resolved. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>• Met: Channel is available in all appropriate languages: The Company indicates that 'Reports can be made in more than a dozen languages'. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Expect MO supplier to have equivalent grievance systems: The Company indicates that 'Suppliers will provide an adequate mechanism for their employees to report integrity concerns, safety issues and misconduct without fear of retaliation'. [Supplier Code of Conduct, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company indicates that 'The Awareline is operated by an independent third party and allows employees 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'. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages: The mechanism is accessible online 'in more than a dozen languages'. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Expects MO supplier to have community grievance systems</li> <li>• Not met: MO supplier communities use global system: The Company indicates that 'The Awareline is operated by an independent third party and allows employees 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.' However, it is not clear if it can be used to report complaints against suppliers' stakeholders. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages users to create or assess system</li> <li>• Not met: Example of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Engages with users on system performance</li> <li>• Not met: Provides user engagement example on performance</li> <li>• Not met: MO suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Response timescales</li> <li>• Met: How complainants will be informed: The Company indicates that 'Reports are entered directly on the Awareline and Issue Management System (AIMS) secure server to prevent any possible breach in security. AIMS makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident'. Also, 'to follow up on an existing report or question, please enter the report key provided to you, along with the password you created when you initially submitted your report or question'. [FAQ Awareline, N/A: <a href="http://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not met: Who is handling the complaint</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Escalation to senior/independent level</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.5	Commitment to non-retaliation over complaints or concerns made	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company indicates that 'GM will not tolerate retaliation against anyone who in good faith reports a concern about GM's operations'. [Non-Retaliation Policy, N/A: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Met: Practical measures to prevent retaliation: The Company indicates that 'Reports may be made anonymously, where permitted by law', although it is not clear alternatives to where the law does not contemplate anonymity. However, the GECC (Global Ethics and Compliance Center) and 'Global Security teams developed a tool kit on how to address workplace retaliation, and also added non-retaliation scenarios to the live "What Would You Do?" course available to managers'. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects MO suppliers to prohibit retaliation: The Company indicates that 'Suppliers will provide an adequate mechanism for their employees to report integrity concerns, safety issues and misconduct without fear of retaliation. (...)Suppliers will prohibit retaliation'. However, it is not clear whether this also applies to suppliers' stakeholders. [Supplier Code of Conduct, N/A: <a href="https://investor.gm.com">investor.gm.com</a>]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms: The Company indicates that 'though we prefer that employees raise concerns internally, we comply with laws that prohibit retaliation, for example, for raising concerns or complaints to government officials or through courts'. However, no evidence found of a public commitment to not impeding access to state-based judicial or nonjudicial mechanisms or other available mechanisms for persons who make allegations. [Code of Conduct 2020 update, N/A: <a href="https://investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## D. Performance: Company Human Rights Practices (20% of Total)

### D.5 Automotive Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.1.a	Living wage (in own production or manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Living wage target timeframe: The Company indicates that 'GM pays a living wage'. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Achieved payment of living wage: The Company indicates that 'GM pays a living wage.' [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Regularly review definition of living wage with unions</li> </ul>
D.5.1.b	Living wage (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The Company indicates, in its supplier code of conduct, that 'suppliers will comply with applicable laws regulating work hours, wages and benefits. Employees must be paid in a timely fashion that meets or exceeds legal minimum standards'. However, no living wage requirements found. [Supplier Code of Conduct, N/A: <a href="https://investor.gm.com">investor.gm.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Improving living wage practices of suppliers: The Company indicates that 'GM, through AIAG, provides training to its suppliers and employees regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other participating AIAG auto company members, all of which contribute to developing the content of the training'. Training participants review wages, among other areas. AIAG is the Automotive Industry Action Group. 'The training is provided to suppliers in high-risk areas at no cost to the supplier'. [Anti-Slavery and Human Trafficking Statement, N/A: <a href="http://gm.com">gm.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.5.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs</li> <li>• Not met: Positive incentives to respect human rights: The Company indicates that 'Compliance within our supply chain is mandatory. When suppliers act responsibly, we reward them with greater business opportunities. (...) We also provide risk scores to the Purchasing team, which are factored into the sourcing process.' However, no further description of the specific positive incentives to respect human rights found. Nothing further found in the latest Sustainability Report. [2018 SR, 20/06/2019 &amp; 2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.5.3	Mapping and disclosing the supply chain	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Identifies suppliers back to product source: The Company indicates that 'Over the past few years, we have developed a robust in-house, customized supply chain visibility tool, which integrates GM plants, Tier I suppliers, known Tier II suppliers and logistics nodes. This tool gives us the capability to map the geographic locations and relationships across the GM supply chain'. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.5.4.a	Prohibition on child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The Company states, in its 2018 SD Form, that 'GM has a zero tolerance policy against the use of child labor'. Moreover, regarding operations at significant risk for incidents of child labor, the Company indicates, in its 2018 SR, that 'We have not identified any GM operations (...) for risks of this nature'. [2018 SD Form, 31/05/2019: <a href="http://investor.gm.com">investor.gm.com</a> &amp; 2018 SR, 20/06/2019]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Age verification of job applicants and workers</li> <li>• Not met: Remediation if children identified</li> </ul>
D.5.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: The Company indicates, in its supplier code of conduct, that 'Suppliers will not use child labor. GM has a zero tolerance policy regarding the employment of children where the age of employment is not in accordance with applicable laws'. However, not evidence found requirements of age verification of job applicants and workers and remediation programmes. [Supplier Code of Conduct, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>• Met: How working with suppliers on child labour: The Company indicates that 'GM, through AIAG, provides training to its suppliers and employees regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other participating AIAG auto company members, all of which contribute to developing the content of the training'. Training participants review the areas of child labor, among others. AIAG is the Automotive Industry Action Group. 'The training is provided to suppliers in high-risk areas at no cost to the supplier'. [Anti-Slavery and Human Trafficking Statement, N/A: <a href="http://gm.com">gm.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.5.a	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Pays workers in full and on time: The Company indicates that ‘We employ ethical recruitment practices and prohibit recruiters from charging recruitment fees to potential employees and from withholding identity documents. Where our employees have employment contracts, we provide access to those contracts. We pay fair wages’. However, no evidence found on the Company paying workers regularly, in full and on time. [Human Rights Policy, N/A: <a href="https://www.gm.com/sustainability">gmsustainability.com</a>]</li> <li>• Not met: Payslips show any legitimate deductions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.5.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Debt and fees rules in codes or contracts: The Company indicates, in its supplier code of conduct, that ‘Suppliers will not use slave, prisoner or any other form of forced or involuntary labor. Suppliers must take reasonable measures to ensure that all of their employees understand the terms of their employment. (...) Suppliers will not engage, directly or indirectly, in human trafficking. GM prohibits human trafficking abuses. (...) Employees must be paid in a timely fashion that meets or exceeds legal minimum standards’. However, no evidence found of debt bondage requirements, including refraining from imposing any financial burdens on workers by withholding wages or expenses including recruitment fees and related recruitment costs’. [Supplier Code of Conduct, N/A: <a href="https://www.investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: How working with suppliers on debt &amp; fees: The Company indicates that ‘GM, through AIAG, provides training to its suppliers and employees regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other participating AIAG auto company members, all of which contribute to developing the content of the training’. Training participants review the areas of forced labor and wages, among others. AIAG is the Automotive Industry Action Group. However, it is not clear how it works with suppliers to eliminate imposing any financial burdens on workers. [Anti-Slavery and Human Trafficking Statement, N/A: <a href="https://www.gm.com">gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.5.5.c	Prohibition on forced labour: Restrictions on workers (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Does not retain documents or restrict movement: The Company indicates that ‘We employ ethical recruitment practices and prohibit recruiters from charging recruitment fees to potential employees and from withholding identity documents’. However, no evidence found on the Company not restricting workers’ freedom of movement outside of work hours or requiring workers to stay at and pay for accommodation by the Company. [Human Rights Policy, N/A: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How sure about agencies or brokers</li> </ul>
D.5.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Free movement rules in codes or contracts: The Company indicates, in its supplier code of conduct, that ‘If necessary for a supplier to use a labor broker, the supplier will ensure the broker employs ethical recruitment practices, complies with applicable laws, and does not withhold identity documents’. However, no further workers’ freedom of movement requirements found, including refraining from restricting workers’ movement through the retention or bank payment cards or similar arrangements for accessing wages or other measures to physically restrict movement. [Supplier Code of Conduct, N/A: <a href="https://www.investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company indicates that 'We respect our employees' right to freedom of association in all countries and comply with our obligation to satisfy all local labor laws and regulations'. Although the Company has 64% coverage of collective bargaining agreements, which is a proxy for not retaliating in practice, no evidence found of a commitment to not interfering with the right of workers to form or join trade unions and to bargain collectively. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Met: Discloses % covered by collective bargaining: The Company indicates that 'GM works with about 33 unions globally, representing approximately 64 percent of our global workforce covered by collective bargaining agreements'. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
D.5.6.b	Freedom of association and collective bargaining (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company indicates, in its supplier code of conduct, that 'Suppliers will comply with applicable laws that recognize and respect the rights of employees to freedom of association and collective bargaining'. Also 'Suppliers will not discriminate on the basis of gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability or gender identity. Harassment or discrimination of any kind will not be tolerated'. However, no evidence found of freedom of association and collective bargaining requirements which include the prohibition of intimidation and harassment, against union members and union representatives. [Supplier Code of Conduct, N/A: <a href="https://investor.gm.com">investor.gm.com</a>]</li> <li>• Met: How working with suppliers on FoA and CB: The Company indicates that 'GM, through AIAG, provides training to its suppliers and employees regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other participating AIAG auto company members, all of which contribute to developing the content of the training'. Training participants review the areas of freedom of association, among others. AIAG is the Automotive Industry Action Group. 'The training is provided to suppliers in high-risk areas at no cost to the supplier'. [Anti-Slavery and Human Trafficking Statement, N/A: <a href="https://gm.com">gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.5.7.a	Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Lost days or near miss disclosure: The Lost Time Injury Rate for the Company's employees in 2019 was 2.85. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Met: Fatalities disclosures: The fatalities in 2019 was 0. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: Regarding fatalities, the Company indicates that 'Our target is zero, so that every person who enters a GM facility leaves safe and unharmed'. Additionally, 'Our comprehensive Global Workplace Safety (GWS) strategy highlights five key focus dimensions that will enable us to achieve our vision of zero injuries'. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Met targets or explains why not: There was a '22% Decrease in workplace injuries over past two years'. Also, 'We reduced lost time injuries by 26 percent and recordable incidents by 15 percent in 2018 compared to 2017'. However, it is not clear targets were met. No further details found in the latest Sustainability Report. [2018 SR, 20/06/2019 &amp; 2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company indicates, in its supplier code of conduct, that ‘Suppliers will provide clean, healthy and safe environments for their employees that meet or exceed legal standards. Suppliers will have safety procedures for their employees and tracking tools that drive to a goal of zero workplace safety incidents. Supplier employees will have the right to refuse work and report any conditions that do not meet these criteria’. [Supplier Code of Conduct, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: Injury rate disclosures: The Recordable Incident Rate in 2019 was 6.20. However, it is not clear this rate is in relation to the Company’s suppliers. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Lost days or near miss disclosures: The Lost Time Injury Rate in 2019 for contractors was 0.30. However, no details found regarding supply chain. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Fatalities disclosures: The fatalities in 2019 was 0. However, it is not clear this figure is in relation to the Company’s suppliers. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S: The Company indicates that ‘In 2018, GM expanded the scope of safety contract management to include all service providers, not just construction. We participated in a safety contract management key contract symposium to directly engage contractors in our safety requirements. We also established a cross-functional safety council with major contractors on the purchasing team’. However, no details found on how it works with suppliers in improving supply chain workers health and safety practices. Nothing further found in the latest Sustainability Report. [2018 SR, 20/06/2019 &amp; 2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Provide analysis of trends in progress made: The Company provides trends on its Lost Time Injury Rate for contractors for the past 5 reporting years. However, no details found in relation to supply chain. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> </ul>
D.5.8.a	Women’s rights (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Process to stop harassment and violence: The Company indicates that ‘today’s business environment requires that companies resolve allegations of inequity and harassment in the workplace. We have proactively taken steps to ensure our organization provides an inclusive culture for all employees. This includes more robust training that addresses sexual harassment, racism, unconscious bias, and physical and psychological safety. Every employee (i.e., salary, hourly and contract) is required to undergo training in these sensitive areas. Additionally, we have enhanced our reporting tools to help identify and resolve issues quickly’. [2018 Diversity and Inclusion Report, N/A]</li> <li>• Not met: Working conditions take account of gender</li> <li>• Met: Equality of opportunity at all levels: The Company indicates that ‘Equileap, a leading organization providing data and insights on gender equality in the corporate sector, named General Motors its No. 1 company in the world for gender equality in the workplace in 2018. We also earned No. 2 on Equileap’s ranking of commitment to gender equality on the S&amp;P 100 Index. Among the reasons we stand atop the lists: we are one of just two global businesses that have pay equality in top, middle and bottom bands as well as no overall gender pay gap across the company’. Also ‘GM has long been a global leader in advocating for women’s equality in the workplace, with women in 34.4 percent of our top management positions. We are signatories to the Equal Pay Pledge, which reflects the value we place on gender equity, our commitment to fostering a diverse and welcoming workplace that values the contributions of all employees, and our shared belief that employees’ protected categories, including gender, should not factor into compensation decisions. We believe that fair and equitable pay should be an essential element of any successful business model, and we are proud to stand with other companies that share this same value. GM conducts gap analyses on an ongoing basis to identify any pay discrepancies and make adjustments whenever discrepancies are found’. [2018 SR, 20/06/2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meets all of the requirements under score 1</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Women's rights in codes or contracts: The Company indicates, in its supplier code of conduct, that 'Suppliers will not discriminate on the basis of gender, (...) sexual orientation, (...) or gender identity. Harassment or discrimination of any kind will not be tolerated'. However, no evidence found of supplier requirements which include 'the provision of equal pay for equal work, and measures to ensure equal opportunities throughout all levels of employment and to eliminate health and safety concerns that are particularly prevalent among women workers'. [Supplier Code of Conduct, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>Not met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirement under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.5.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Respects max hours, min breaks and rest periods in its own operations</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: How it implements and checks this</li> </ul>
D.5.9.b	Working hours (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Working hours in codes or contracts: The Company indicates, in its supplier code of conduct, that 'Suppliers will comply with applicable laws regulating work hours, wages and benefits'. However, it is not clear the working hours requirements include respect for applicable international standards or at least require a maximum regular working hours of 48 hours per week (excluding overtime) and minimum breaks. [Supplier Code of Conduct, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>Met: How working with suppliers on working hours: The Company indicates that 'GM, through AIAG, provides training to its suppliers and employees regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other participating AIAG auto company members, all of which contribute to developing the content of the training'. Training participants review the areas of working hours, among others. AIAG is the Automotive Industry Action Group. The training is provided to suppliers in high-risk areas at no cost to the supplier' [Anti-Slavery and Human Trafficking Statement, N/A: <a href="http://gm.com">gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.5.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company indicates that 'we require our suppliers to engage in supply chain due diligence to improve understanding and reporting of component content supplied to GM'. However, no evidence found of requirements to conduct due diligence in accordance with the OECD Guidance for at least 3TG including through contractual arrangements. [Conflict Minerals Policy, N/A: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>Not met: Works with smelters/refiners and suppliers to build capacity: The Company indicates that 'We engage with our suppliers to assist them in building capabilities to improve chain of custody declarations and to increase the transparency of 3TG in our global supply chain. We communicate our conflict minerals reporting requirements to suppliers through various mechanisms, including teleconferences, emails, publications, and webinars. We have also established a direct email address (...) to provide our suppliers a streamlined path of communication relating to conflict minerals. We also participate in conflict minerals initiatives with other automobile manufacturers through the Automotive Industry Action Group (AIAG), a non-profit automotive industry trade association. Through our membership with AIAG, we collaborate with other AIAG member companies to develop common methods to obtain 3TG chain of custody declarations from suppliers in the automotive industry'. In addition, the Company indicates in its Sustainability Report: 'Beyond our own reporting activities, we work with our suppliers regularly to increase education and awareness regarding conflict minerals, including conducting periodic webinars and providing a dedicated email address to answer specific questions.' However, no details found on how it also works with smelters/refiners in capacity building. [Conflict Minerals Policy, N/A: <a href="http://gmsustainability.com">gmsustainability.com</a> &amp; 2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Contractual requirement to disclosure smelter/refiner information: The Company indicates that 'We also requested suppliers who reported procuring 3TG from a covered country to report to us the identity of the applicable smelters/refiners'. However, it is not clear this request is incorporated into commercial contracts/written agreements. [2019 10_K, 24/01/2020: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: Contractual requirement covers all minerals</li> </ul>
D.5.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Risk identification and disclosure in line with OECD Guidance: The Company indicates that 'We analyzed the CMRT responses for completeness and consistency. We also requested suppliers who reported procuring 3TG from a covered country to report to us the identity of the applicable smelters/refiners. (...)Through our membership in RMI (...), we are able to obtain a list of smelters/refiners who are in conformance with the RMAP, as well as specific information on smelters/refiners that is available only to RMI member companies. We use this information internally within GM, to analyze the smelter/refiner lists provided to us through our suppliers' CMRT submissions. Through this process, we identified suppliers that deliver parts that may contain 3TG from smelters/refiners that are not yet conformant to the RMAP. However, no further details found including risks identified with respect to at least 3TG [2019 10_K, 24/01/2020: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>• Met: Identification of smelter/refiners and OECD Guidance: The Company indicates that 'We analyzed the CMRT responses for completeness and consistency. We also requested suppliers who reported procuring 3TG from a covered country to report to us the identity of the applicable smelters/refiners. (...)Through our membership in RMI (...), we are able to obtain a list of smelters/refiners who are in conformance with the RMAP, as well as specific information on smelters/refiners that is available only to RMI member companies. We use this information internally within GM, to analyze the smelter/refiner lists provided to us through our suppliers' CMRT submissions. Through this process, we identified suppliers that deliver parts that may contain 3TG from smelters/refiners that are not yet conformant to the RMAP. [...] We also requested our suppliers to improve the accuracy of their smelter lists by eliminating the smelters/refiners that are no longer in operation and removing those entities which did not meet the definition of eligible smelters/refiners. In addition to the smelter name, the CMRT form also seeks information related to the location (country) of the mine from which the 3TG is procured. Although we requested that our suppliers include this information in their responses, not all suppliers provided responses with country (origin) information'. [2019 10_K, 24/01/2020: <a href="http://investor.gm.com">investor.gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses smelters/refiners judged in line with OECD Guidance: The Company indicates that 'because most of our suppliers reported 3TG usage at a company-wide level, the information provided by our suppliers, including the identity of smelters/refiners included in the appendix, may relate to non-GM products. In addition, not all of our suppliers provided to us smelter/refiner identity and country of origin information for 3TG. Further, we understand that smelters/refiners generally commingle minerals from different mine sources, which may further impair our suppliers' ability to track the source of 3TG. Accordingly, we cannot confirm the accuracy or completeness of the attached appendix of potential smelters/refiners and we cannot definitively determine the origin of all of the 3TG we utilize in our products'. The Company discloses list of smelters and refiners, whoever, it is not clear which of them are conformant to RMAP (or other validation program). [2019 10_K, 24/01/2020: <a href="http://investor.gm.com">investor.gm.com</a>]</li> <li>• Not met: Risk identification and disclosure covers all minerals</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes mineral risk management plan for supply chain: The Company indicates that 'We also have established a formal escalation process for resolving concerns regarding the use of 3TG in our supply chain. Specifically, when our conflict minerals team identifies defects, inconsistencies, or other problems in a supplier's CMRT response (including a failure to respond), we first attempt to work directly with the supplier to resolve the issue. If our conflict minerals team does not receive an acceptable response from the supplier, the issue is escalated to the appropriate leadership, and eventually to the Conflict Minerals Executive Steering Committee. If necessary, we may preclude a supplier from receiving future business if the concern is not resolved. Smelter/refiner outreach and certification are also important risk mitigation components of our conflict minerals program. To increase the number of RMAP conformant smelters/refiners, GM has conducted outreach to 131 eligible smelters/refiners by sending letters to encourage them to join the RMAP. We also encouraged our suppliers to send outreach letters to the smelters/refiners in their smelter lists who are not determined to be RMAP conformant by RMI or other organizations with audit protocols recognized by RMI. Results of our monitoring and outreach efforts are reported to the Conflict Minerals Executive Steering Committee at regular periodic meetings and tracked against prior year results'. In addition, it indicates in its Sustainability Report: 'We have structured an internal management system to support supply chain due diligence. Part of that structure includes a compliance committee of multifunctional GM leaders and an executive steering committee to provide leadership and direction for the program. Beyond our own reporting activities, we work with our suppliers regularly to increase education and awareness regarding conflict minerals, including conducting periodic webinars and providing a dedicated email address to answer specific questions. We continue to collaborate with others in the industry to educate suppliers'. It also indicates in its policy that 'We engage with our suppliers to assist them in building capabilities to improve chain of custody declarations and to increase the transparency of 3TG in our global supply chain. We communicate our conflict minerals reporting requirements to suppliers through various mechanisms, including teleconferences, emails, publications, and webinars. We have also established a direct email address (...) to provide our suppliers a streamlined path of communication relating to conflict minerals. [2019 10_K, 24/01/2020: <a href="http://investor.gm.com">investor.gm.com</a> &amp; 2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>• Not met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Disclose better risk prevention/mitigation over time</li> <li>• Not met: Suppliers and stakeholders engaged in risk management strategy</li> <li>• Not met: Risk management and response processes cover all minerals</li> </ul>
D.5.11	Responsible Materials Sourcing	[SD.5.10]	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Due diligence for raw materials in supplier code/contracts</li> <li>• Not met: Works with suppliers to build capacity in risk assessment and due diligence: The Company indicates: 'Beyond our own reporting activities, we work with our suppliers regularly to increase education and awareness regarding conflict minerals, including conducting periodic webinars and providing a dedicated email address to answer specific questions. [...] Through our membership in RMI, we are working directly and actively in a cobalt subgroup in the following areas: Using the Cobalt Reporting Template (CRT) with key suppliers. The CRT is an important tool in the identification of refiners in the cobalt supply chain; Identifying and assisting with the disposition of cobalt companies to determine if these companies meet RMI's industry specification for a legitimate cobalt refiner; [among others]' However, it is not clear how the Company works with rubber, leather and minerals suppliers different than the conflict minerals to contribute to building their capacity in risk assessment and improving their due diligence performance. [2019 Sustainability Report, 2020: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Meets all requirements under score 1</li> <li>• Not met: Identify the sources of high-risk raw materials in its supply chain</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• <b>Headline:</b> news investigation reports on child labour in the DRC in a supply chain connected to General Motors</li> <li>• <b>Area:</b> Child labour, health &amp; safety -</li> <li>• <b>Story:</b> In March 2018, a CBS news investigation reported on the persistence of child labour in the dangerous mining of cobalt in the Democratic Republic of Congo. The investigation alleged that major electronics and electric vehicle companies were still not doing enough to stop human rights abuses entering their cobalt supply chains, including Tesla, Volkswagen, General Motors and Fiat Chrysler. On November 15, 2017, Amnesty International, a Human Rights NGO, released a report which reveals that electronic and electric vehicle companies, including General Motors, are still not doing enough to stop human rights abuses entering their cobalt supply chains.</li> </ul> <p>The report assessed the policies and practices of 29 companies and how much their cobalt-sourcing practices have improved since its previous report published in January 2016. More than half of the world's cobalt, a key element in lithium-ion batteries, is from the Democratic Republic of Congo (DRC), where Amnesty has found human rights abuses. Amnesty International stated that about a fifth of the country's cobalt production is mined by informal miners including children, often in dangerous conditions.</p> <p>The electronics companies and the automobile manufacturers included in the report are: Apple, Samsung SDI, Dell, HP, BMW, Tesla, LG Chem, Sony, Samsung Electronics, General Motors, Volkswagen, Fiat-Chrysler, Daimler, Hunan, Shanshan, Amperex Technology, Tianjin Lishen, Microsoft, Lenovo, Renault, Vodafone, Huawei, L&amp;F, Tianjin B&amp;M, BYD, Coslight, Shenzhen BAK and ZTE.</p> <p>According to the CBS investigation, the situation was still worrying despite the attention and concern that had previously been raised by an Amnesty International report. The CBS investigation reported on the complexity of tracing child-mined cobalt in the global supply chain. Investigators followed the mineral as it left the mines - piled on several modes of transport, including bicycles. Allegedly, unlabelled sacks were already mixed up, making it impossible to know who had mined the mineral inside. Later, the extracted cobalt was brought to a large market where it was bought by a Chinese company for low prices.</p> <p>This event does not change our severity assessment of the case.</p> <ul style="list-style-type: none"> <li>• Sources: [The Week - 06/04/2018: <a href="http://theweek.com">theweek.com</a>][CBS News - 05/03/2018: <a href="http://cbsnews.com">cbsnews.com</a>][Bloomberg - 11/01/2018: <a href="http://bloomberg.com">bloomberg.com</a>][Amnesty International - 15/11/2017: <a href="http://amnesty.org">amnesty.org</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Public response available: The Company responded to Amnesty International's report and states that ' we appreciate the seriousness of the allegations regarding Cobalt mining and have undertaken reasonable diligence to evaluate LG Chem's compliance with GM's policies and expectations' [Company responses to Amnesty International, 15/11/2017: <a href="http://amnesty.org">amnesty.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Response goes into detail</li> </ul>
E(1).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Company policies address the general issues raised: The Company states the following in its Human Rights Policy: 'We comply and expect our suppliers and other business partners to comply with laws that promote safe working conditions and individual security; laws prohibiting forced labor; prohibitions on the employment of underage children'. [Human Rights Policy, N/A: <a href="http://gmsustainability.com">gmsustainability.com</a>]</li> <li>• <b>Met:</b> Policies apply to the type of business relationships involved: Suppliers are forbidden from using child labour, and must comply with certain health and safety standards. [Supplier Code of Conduct, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not met:</b> Policies address the specific rights in question: Although the Supplier Code of Conduct includes specific measures for health and safety, no evidence of mechanisms to prevent child labour could be found. [Supplier Code of Conduct, N/A: <a href="http://investor.gm.com">investor.gm.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: There is no evidence in the company's response to AI that it engaged with stakeholders. [Company responses to Amnesty International, 15/11/2017: <a href="https://www.amnesty.org">amnesty.org</a>]</li> <li>• Not met: Provides remedies to affected stakeholders</li> <li>• Not met: Has reviewed management systems to prevent recurrence: Though the company states that 'We have developed a comprehensive risk management framework to support GM's supply chain sustainability focus. This framework focuses on achieving supply chain sustainability through risk assessment, consistent communication to suppliers and investigation of supply chain concerns', there is no indication that it occurred after the AI report. [Company responses to Amnesty International, 15/11/2017: <a href="https://www.amnesty.org">amnesty.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: BMW, and GM linked to child labor issues in illegal mica mining in India</li> <li>• Area: child labour; forced labour</li> <li>• Story: In 2018, Terres de Hommes, a Dutch child rights NGO published a report on child labour in the Mica industry. Mica is a mineral that creates the shimmering car paint used on millions of vehicles around the world. It is estimated that up to 20,000 children work in hundreds of small-scale mines in northern Jharkhand and southern Bihar. On visits this year to illegal mines in the Tisri subdistrict in the Indian state of Jharkhand, the Guardian documented children aged 12 mining mica underground in hazardous, leaking mineshafts, hammering glittering rock flakes from walls and carrying heavy loads through slippery tunnels. In addition, many families are bonded to the mines by large debts owed to local moneylenders or mine owners who charge up to 200% annual interest.</li> <li>• Sources: [Thompson Reuters Foundation - 19/12/2017: <a href="https://www.news.trust.org">news.trust.org</a>][BHRRC -: <a href="https://www.business-humanrights.org">business-humanrights.org</a>][The Guardian - 28/12/2016: <a href="https://www.theguardian.com">theguardian.com</a>][Terres de Hommes - 12/03/2018: <a href="https://www.terredeshommes.nl">terredeshommes.nl</a>]</li> </ul>
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response available: The company stated that it would conduct a full investigation of its suppliers with respect to the allegation. [Vauxhall and BMW among car firms linked to child labour over glittery mica paint, 28/07/2016: <a href="https://www.theguardian.com">theguardian.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail: There is no evidence that the company's response to the allegation goes into detail.</li> </ul>
E(2).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The company's human rights policy states that the company complies with, and expect suppliers and other business partners to comply with, "laws that promote safe working conditions and individual security; laws prohibiting forced labor; prohibitions on the employment of underage children." [Human Rights Policy, N/A: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Met: Policies apply to the type of business relationships involved: The company's supplier code of conduct states that suppliers will not use slave, prisoner or any other form of forced or involuntary labor, or child labor. The company states that suppliers "must take reasonable measures to ensure that all of their employees understand the terms of their employment." [Supplier Code of Conduct, N/A: <a href="https://www.investor.gm.com">investor.gm.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question: No evidence on age verification or mechanisms to prevent forced labour found.</li> </ul>
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: While the Company has engaged with Amnesty International, no evidence of engagement with affected stakeholders could be found. [Company responses to Amnesty International, 15/11/2017: <a href="https://www.amnesty.org">amnesty.org</a>]</li> <li>• Not met: Encourages linked business to engage affected stakeholders: There is no evidence to suggest that the company has encouraged its suppliers to engage with affected stakeholders.</li> <li>• Not met: Provides remedies to affected stakeholders: There is no evidence to suggest that the company has provided remedies to affected stakeholders.</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Has reviewed management systems to prevent recurrence: There is no evidence to suggest that the company has reviewed management systems to prevent recurrence.</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Remedies are satisfactory to the victims: There is no evidence to suggest that the company has provided remedies that are satisfactory to the victims.</li> <li>• Not met: Has improved systems and engaged affected stakeholders: There is no evidence to suggest that the company has improved systems and engaged affected stakeholders.</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.87 out of 4	Out of a total of 60 indicators assessed under sections A-D of the benchmark, General Motors made data public that met one or more elements of the methodology in 28 cases, leading to a disclosure score of 1.87 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Met: Company reports on GRI: The Company indicates that its 2019 Sustainability Report 'has been prepared according to GRI Standards', and includes a GRI content index. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> <li>• Met: Company reports on SASB: The Sustainability report contains a SASB index. [2019 Sustainability Report, 2020: <a href="https://www.gmsustainability.com">gmsustainability.com</a>]</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	General Motors met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> <li>• Not met: Score 1 for D.5.1.a: Living wage (in own production or manufacturing operations)</li> <li>• Not met: Score 2 for D.5.7.a: Health and safety: Fatalities, lost days, injury rates (in own production of manufacturing operations)</li> </ul>

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

The CHRB is part of the World Benchmarking Alliance ('WBA'). The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark

only and may change without notice. Any views expressed in the Benchmark only represent the views of WBA, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with Dutch law and shall be subject to the exclusive jurisdiction of the Courts of Amsterdam.

As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

#### COPYRIGHT

Our publications and benchmarks are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution-Non Commercial-No Derivatives 4.0 International License. To view a copy of this license, visit [creativecommons.org](https://creativecommons.org)