

**Corporate Human Rights Benchmark
2022 Company Scoresheet**

Company Name General Motors Corporation (GM)
Industry Automotive (Own Operations and Supply Chain)
Overall Score 36.7 out of 100

Theme Score	Out of	For Theme
5.0	10	A. Governance and Policies
13.4	25	B. Embedding Respect and Human Rights Due Diligence
7.5	20	C. Remedies and Grievance Mechanisms
8.3	25	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company states in its Human Rights Policy that it 'is committed to respecting all internationally recognized human rights, including those described in the Universal Declaration of Human Rights' [Human Rights Policy, 08/2021: gmsustainability.com] Met: Universal Declaration of Human rights (UDHR): See above [Human Rights Policy, 08/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs Met: Commitment to the OECD Guidelines for Multinational Enterprises: The Company states in its Human Rights Policy that: 'is committed to respecting all internationally recognized human rights, including those described in [...] the OECD Guidelines for Multinational Enterprises,[...]'. In addition, the Supplier Code of Conduct indicates: 'GM is also committed, and expects suppliers to commit, to the OECD Guidelines for Multinational Enterprises'. [Human Rights Policy, 08/2021: gmsustainability.com] & [Supplier Code of Conduct, N/A: gmsustainability.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Company has a commitment to the ILO Core: The Company states in its Human Rights Policy that: 'is committed to respecting all internationally recognized human rights, including those described in [...] the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (the ILO Core Conventions)'. [Human Rights Policy, 08/2021: gmsustainability.com] Met: Company has a explicit commitment to All four ILO Core: Also in its Human Rights Policy, the Company indicates that it 'commits to respect these rights, which

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>are: Freedom of association and the effective recognition of the right to collective bargaining; The elimination of all forms of forced or compulsory labor; The effective abolition of child labor; and The elimination of discrimination in respect of employment and occupation'. [Human Rights Policy, 08/2021: gmsustainability.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: The Supplier Code of Conduct indicates: 'GM is also committed, and expects suppliers to commit, to [...] the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work'. [Supplier Code of Conduct, N/A: gmsustainability.com] • Met: Company explicitly list All four ILO for suppliers: The Company includes provisions related to all ILO Core in its Supplier Code of Conduct. Among them: 'Suppliers and their employment agencies will not use slave, forced prisoner, bonded, indentured, or any other form of forced or involuntary labor. [...] Suppliers and their employment agencies will not use child labor. [...] Suppliers will be committed to a workplace free of harassment and unlawful discrimination'. Regarding the right to freedom of association and collective bargaining, it indicates: 'Suppliers will comply with and respect all applicable laws and ILO core conventions related to the rights of workers to form and join trade unions of their own choosing, to bargain collectively, to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities'. [Supplier Code of Conduct, N/A: gmsustainability.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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"> • Met: Commitment to respect H&S of workers: The Company states: 'we are committed to the following [...]: We will provide and maintain safe and healthy working conditions that meet or exceed applicable legal standards for occupational health and safety'. [Human Rights Policy, 08/2021: gmsustainability.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: It also indicates: 'We will comply with all applicable laws concerning working hours.' However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [Human Rights Policy, 08/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company indicates in its Supplier Code: 'Suppliers will provide clean, healthy, and safe working environments for their personnel 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: gmsustainability.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates that 'Suppliers will comply with local laws and collective bargaining agreements (where applicable) regarding working hours. Working hours must not exceed the maximum set by local law'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct, N/A: gmsustainability.com]
A.1.3.a.MO	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (MO)	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"> • Met: Responsible mineral sourcing: The Responsible Minerals Sourcing Policy indicates: 'General Motors (GM) is committed to sustainable and responsible sourcing of goods and services throughout our supply chain, including the various extracted minerals from around the world that ultimately become incorporated into our goods or services'. [Responsible Mineral Sourcing Policy, N/A: gmsustainability.com] • Met: Based on OECD Guidance: The Conflict Minerals Policy states: 'As an organization, we have committed to: [...] Exercise due diligence with relevant suppliers in accordance with the OECD Guidance'. Similarly, the Responsible Minerals Sourcing Policy indicates: 'We are adopting this policy and have designed our program and due diligence practices in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas(OECD Due Diligence Guidance) in order to address responsible mineral sourcing'. [Responsible Mineral Sourcing Policy, N/A: gmsustainability.com] & [Conflict Minerals Policy, N/A: gmsustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Requires suppliers to commit to responsible mineral sourcing: The Supplier Code of Conduct indicates: 'Suppliers will implement a policy committing to the responsible sourcing of all minerals and materials in line with GM's Conflict Minerals Policy and Responsible Minerals Sourcing Policy'. [Supplier Code of Conduct, N/A: gmsustainability.com] Score 2 • Not Met: Commits to follow OECD Guidance for all minerals: In its feedback to CHRB, the Company makes reference to the 2021 CHRB Disclosure. However, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. • Met: Suppliers expected to make similar requirements of their suppliers: The Supplier Code of Conduct indicates: 'Suppliers will implement a policy committing to the responsible sourcing of all minerals and materials in line with GM's Conflict Minerals Policy and Responsible Minerals Sourcing Policy. These policies require conducting due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including its current supplements on tin, tantalum, tungsten and gold (3TG)'. The Supplier Code of Conduct indicates: 'Suppliers will have a process to communicate these Code requirements through their supply chain and to require suppliers to adopt management systems and practices for compliance with this Code or requirements materially consistent with this Code'. [Supplier Code of Conduct, N/A: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com]
A.1.3.b.MO	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (MO)	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"> • Met: Migrant worker's rights: The Company indicates in its Human Rights Policy: 'We recognize and respect the rights of vulnerable groups around the world, such as indigenous peoples, children, and migrant workers'. [Human Rights Policy, 08/2021: gmsustainability.com] • Met: Expects suppliers to respect these rights: The Company indicates in its Human Rights Policy: 'We recognize and respect the rights of vulnerable groups around the world, such as indigenous peoples, children, and migrant workers. We expect our suppliers to be similarly committed to protecting the rights of vulnerable groups'. [Human Rights Policy, 08/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles: It also indicates: 'The rights of these groups have been established and codified in various international conventions, including: United Nations (UN) Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), 1979, UN Convention on the Rights of the Child (CRC), 1989' However, no formal statement of commitment was found. [Human Rights Policy, 08/2021: gmsustainability.com] • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	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"> • Met: The Company commits to remedy: The Company indicates in its Human Rights Policy: 'We take seriously our responsibility to identify, prevent, mitigate, and remediate human rights related risks and impacts to which we may cause or contribute. We will implement the necessary policies and processes to fulfil each of these responsibilities. When we discover potential adverse human rights impacts, we will investigate, and where appropriate, we will engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their remediation through legitimate processes'. [Human Rights Policy, 08/2021: gmsustainability.com] • Met: Company expect suppliers to make this commitment: In addition, the Company indicates: 'we expect our suppliers to have processes in place to prevent, mitigate, and remediate adverse human rights impacts that they may cause or to which they may contribute and we expect those suppliers to cascade that expectation as well through their own supply chains pursuant to our Supplier Code of Conduct'. [Human Rights Policy, 08/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact: The Supplier Code of Conduct indicates: 'When potential adverse impacts are discovered, suppliers will investigate, and where appropriate, will engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their

Indicator Code	Indicator name	Score (out of 2)	Explanation
			remediation through legitimate processes'. However, no commitment to work with suppliers to remedy adverse impacts which are directly linked to the company's operations, products or services found. In its feedback to CHRB, the Company makes reference to the 2021 CHRB Disclosure which states: 'Remediation will include working with the supplier to resolve the nonconformance up to re-sourcing'. However, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Supplier Code of Conduct, N/A: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com]
A.1.5	Commitment to respect the rights of human rights defenders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Zero tolerance attacks on HRs Defenders (HRDs): The Company states in its Human Rights Policy: 'We commit to neither tolerate nor knowingly contribute to threats, intimidation, or attacks against human rights defenders in relation to our operations. We encourage our suppliers to make the same commitment'. [Human Rights Policy, 08/2021: gmsustainability.com] • Met: Company expect suppliers to make this commitment: The Supplier Code of Conduct indicates: 'Human rights defenders are individuals or groups who act to promote and protect human rights and fundamental freedoms through peaceful means. Suppliers will commit to neither tolerate nor contribute to threats, intimidation, or attacks against human rights defenders in relation to their operations to create safe and enabling environments for civic engagement and human rights at local, national, or international levels'. [Supplier Code of Conduct, N/A: gmsustainability.com] Score 2 <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The 2021 Sustainability Report indicates: 'In 2021, the Board's Governance and Corporate Responsibility Committee approved an updated and strengthened Human Rights Policy. The Board also formally added human rights oversight to the Governance and Corporate Responsibility Committee's annual responsibilities. It regularly reviews GM's human rights-related policies and strategies and conducts an annual review of GM's human rights practices and responsible sourcing practices. Other committees of the Board, including the Executive Compensation Committee, the Risk and Cybersecurity Committee and the Audit Committee, also engage with human rights-related matters as needed. For example, when relevant, the Executive Compensation Committee addresses certain human capital management matters, the Risk and Cybersecurity Committee addresses supply chain risks and the Audit Committee oversees GM's ethics and compliance program'. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Describe HR expertise of Board member: The Company indicates that 'the Board also considers human rights expertise as part of its annual ESG self-evaluation to ensure it has the requisite skills and expertise to oversee the Company's ESG opportunities, priorities and risks'. However, no details found in relation to the actual HR-related expertise of board member(s) [2021 CHRB Disclosure, 2021: gmsustainability.com] Score 2 <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board/Committee review HRs strategy: Regarding the Governance and Corporate Responsibility Committee, the 2021 Sustainability Report indicates: 'The Committee shall meet as often as may be deemed necessary or appropriate'. It is part of its duties: 'Annually review the Company's human rights practices, including responsible sourcing practices within the Company's supply chain'. The 2021 CHRB Disclosure states: that Board provides regular oversight of human rights-related issues and topics, including but not limited to routine workplace safety reviews, and addresses human capital management and supply chain matters as needed. The Board also considers human rights expertise as part of its annual ESG self-evaluation to ensure it has the requisite skills and expertise to oversee the Company's ESG opportunities, priorities and risks'. [2021 Sustainability Report, 10/03/2021: gmsustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Examples/trends re HR discussion in the last reporting period: In 2021, the Board’s Governance and Corporate Responsibility Committee approved an updated and strengthened Human Rights Policy. The Board also formally added human rights oversight to the Governance and Corporate Responsibility Committee’s annual responsibilities. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	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"> • Met: Incentives for at least one board member: The 2021 CHR B Disclosure states: ‘The Company’s short-term incentive plan (STIP) includes strategic goals that make up 25% of the annual STIP award for each of our named executive officers (NEOs), and the Company’s ESG performance is factored into these strategic goals. For example, our STIP includes strategic goals related to ‘Our People’ [...] and ‘Citizenship’ [...]. Specific results considered by our Compensation Committee in 2021 in determining our NEOs’ performance against strategic goals related to ‘Our People’ include the prioritization of our safety culture, diversity hiring, and engagement and inclusivity scores’. Among these executive officers is Mary T. Barra, Chairman and CEO. The 2022 Proxy Statement discloses more details on the STIP for the CEO related to ‘People’: ‘Continued to prioritize our safety culture through multiple initiatives. [...] Exceeded by 100 percent our hiring commitment to OneTen, a coalition aiming to upskill, hire, and advance 1 million Black Americans over the next decade into family sustaining jobs with opportunities for advancement’. The Sustainability report 2019 included the following: ‘Continued to drive enterprise engagement towards a safety -first culture resulting in zero fatalities and reductions in permanently disabling injuries and lost workdays’. [2021 CHR B Disclosure, 2021: gmsustainability.com] & [2022 Proxy Statement, 13/06/2022: investor.gm.com] • Met: At least one key HR risk, beyond employee H&S: As indicates above, the STIP for the CEO related include: ‘Continued to prioritize our safety culture through multiple initiatives. [...] Exceeded by 100 percent our hiring commitment to OneTen, a coalition aiming to upskill, hire, and advance 1 million Black Americans over the next decade into family sustaining jobs with opportunities for advancement’. [2022 Proxy Statement, 13/06/2022: investor.gm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and 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"> • Not Met: Board process to review bussiness model and strategy: The 2021 CHR B Disclosure indicates the Board level oversight of it Human Rights approach: ‘GM’s Strategic Risk Management (SRM) approach is centered on strong risk governance practices across functions. The SRM Team supports the business in identifying and prioritizing known risks, as well as emerging risks on the horizon. Risks are assessed and analyzed, using specialized techniques such as wargaming or premortem thinking, when appropriate, to build mitigation strategies. A key component of GM’s SRM approach is conducting a regular company wide risk assessment. The assessment includes external inputs such as research on trends, current events and market dynamics, as well as internal inputs from senior leaders across our business units. The assessment also considers risks across our value chain, including those upstream in our supply chain and downstream among dealers, consumers, communities and other stakeholders. This work results in an enterprise risk profile that is regularly reviewed with our senior leaders, as well as the Risk and Cybersecurity Committee of the Board. These reviews include changes to our risk landscape and ongoing risk management plans. Our 2022 enterprise risk profile includes a set of key risk themes—such as workforce strategy, health and safety, and supply chain resiliency—that have human rights-related components. We measure progress against these risks on a quarterly basis and share updates with the Risk and Cybersecurity Committee of the Board’. However, although the Company explains its Strategic Risk Management and that it reviews the enterprise risk profile at Board level, no further description found, including whether there is process in place that allows discussion and revision of its business model and strategy for inherent risks, including human rights. [2021 CHR B Disclosure, 2021: gmsustainability.com] <ul style="list-style-type: none"> • Not Met: Describe frequency and triggers for reviewing

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The 2021 CHRB Disclosure states: 'Many GM corporate policies, including our Human Rights Policy, have a corresponding executive-in-charge who administers the policy. For GM's Human Rights Policy, the chief sustainability officer (CSO) is the executive-in-charge'. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The document also indicates that 'As human rights-related issues are connected with many different parts of the business, numerous senior leaders also have human rights-related responsibilities and accountability. For example, senior leaders from Global Purchasing and Supply Chain (GPSC) are responsible for monitoring that human rights across our supply chain are respected, with a particular focus on the issues we have identified as being salient; senior leaders from Human Resources are responsible for monitoring that the human rights of our global workforce are respected; and senior leaders from within Global Public Policy and Legal as well as Human Resources are responsible for monitoring compliance with human rights-related laws and regulations and for the effectiveness and ongoing operations of our grievance mechanism, the Awareline'. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Met: Day-to-day resources and expertise allocation in own ops: In addition, 'Each of these senior leaders, and others, are responsible for setting strategy in alignment with GM's overall Human Rights Policy and for structuring and resourcing the day-to-day management as appropriate. [...] Other areas, such as Human Resources and Labor Relations already have existing teams, policies, systems and practices, so the current focus there is on identifying gaps and developing effective monitoring systems. GM's Global Sustainability Strategies Team serves to convene, inform, coordinate, and build capacity with respect to human rights among these functional areas and to promote the inclusion of external stakeholders (particularly those that could be potentially impacted) and their perspectives in internal conversations and decisions. This includes check-ins and evaluations to understand current challenges and opportunities and ensure the requisite knowledge, tools and resources are available'. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Met: Resources and expertise allocation in the supply chain: As indicated above, 'Each of these senior leaders, and others, are responsible for setting strategy in alignment with GM's overall Human Rights Policy and for structuring and resourcing the day-to-day management as appropriate. For instance, within the GPSC function, a new ethical sourcing team is actively working to establish the policies and practices needed to effectively monitor the salient human rights issues found within our supply base'. [2021 CHRB Disclosure, 2021: gmsustainability.com]
B.1.2	Incentives and performance management	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"> • Met: Senior manager incentives for human rights: The 2021 CHRB Disclosure states: 'The Company's short-term incentive plan (STIP) includes strategic goals that make up 25% of the annual STIP award for each of our named executive officers (NEOs), and the Company's ESG performance is factored into these strategic goals. For example, our STIP includes strategic goals related to 'Our People' (e.g., attracting, retaining and engaging our people by providing the best employee experience that supports and invests in diversity, equity and inclusion, while living values and behaviors that return people home safely every day) and 'Citizenship' [...]. Specific results considered by our Compensation Committee in 2021 in determining our NEOs' performance against strategic goals related to 'Our People' include the prioritization of our safety culture, diversity hiring, and engagement and inclusivity scores'. [2021 CHRB Disclosure, 2021: gmsustainability.com] & [2022 Proxy Statement, 13/06/2022: investor.gm.com] • Met: At least one key HR risk, beyond employee H&S: As indicated above, the 2022 Proxy Statement discloses more details on the STIP for the CEO related to

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			<p>‘People’: ‘Continued to prioritize our safety culture through multiple initiatives. [...] Exceeded by 100 percent our hiring commitment to OneTen, a coalition aiming to upskill, hire, and advance 1 million Black Americans over the next decade into family sustaining jobs with opportunities for advancement’. Part of the incentive scheme of the Executive Vice President, Global Product Development, Purchasing and Supply Chain entails: ‘Received strong engagement and Inclusivity Index scores, while developing leadership initiatives to further engage our people in order to become the most inclusive company in the world’. The Executive Vice President also has the goal of ‘Continued to prioritize our safety culture through multiple initiatives’. [2022 Proxy Statement, 13/06/2022: investor.gm.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
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"> • Not Met: HR risks is integrated as part of enterprise risk system: The Company indicates: ‘GM’s Strategic Risk Management (SRM) approach is centered on strong risk governance practices across functions. The SRM Team supports the business in identifying and prioritizing known risks, as well as emerging risks on the horizon. Risks are assessed and analyzed, using specialized techniques such as wargaming or premortem thinking, when appropriate, to build mitigation strategies. A key component of GM’s SRM approach is conducting a regular companywide risk assessment. The assessment includes external inputs such as research on trends, current events and market dynamics, as well as internal inputs from senior leaders across our business units. The assessment also considers risks across our value chain, including those upstream in our supply chain and downstream among dealers, consumers, communities and other stakeholders. This work results in an enterprise risk profile that is regularly reviewed with our senior leaders, as well as the Risk and Cybersecurity Committee of the Board. These reviews include changes to our risk landscape and ongoing risk management plans. Our 2022 enterprise risk profile includes a set of key risk themes—such as workforce strategy, health and safety, and supply chain resiliency—that have human rights-related components. We measure progress against these risks on a quarterly basis and share updates with the Risk and Cybersecurity Committee of the Board’. However, although the Company indicates that key risk themes have human rights-related components, it is not clear what does this entail. The 2022 Form 10-K discloses the Company’s Risk Factors in further details. Under ‘Risks related to our own operations’, it describes the following: ‘The international scale and footprint of our operations expose us to additional risks. We manufacture, sell and service products globally and rely upon an integrated global supply chain to deliver the raw materials, components, systems and parts that we need to manufacture our products. Our global operations subject us to extensive domestic and foreign legal and regulatory requirements, and a variety of other political, economic and regulatory risks, including: [...] changes in trade compliance, labor, employment, [...] and other laws, regulations or government policies impacting our overall business model or practices or restricting our ability to manufacture, purchase or sell products consistent with market demand and our business objectives. [...] differing labor regulations, agreements, requirements and union relationships. [...] public health crises’. Under ‘Risks related to government regulations and litigation’ is: ‘We could be materially adversely affected by unusual or significant litigation, governmental investigations or other proceedings. We are subject to legal proceedings in the U.S. and elsewhere involving various issues, including product liability lawsuits, warranty litigation, class action litigations alleging product defects, [...] labor and employment litigation and claims and actions arising from restructurings and divestitures of operations and assets’. Moreover, ‘Security breaches and other disruptions of our in-vehicle systems could impact the safety of our customers and reduce confidence in GM and our products’. However, although it indicates labor related risks, it seems to focus on how changes in labor regulation may affect the Company’s negatively, rather than a concern with not complying with regulations and its impacts. Risks related to safety, seem to focus on product safety. It is not clear how Human Rights risks is integrated in its robust enterprise risk management. [2021 CHRB Disclosure, 2021: gmsustainability.com] & [2022 Form 10-K, 2022: investor.gm.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment: The Company provides a source for this indicator in its feedback, however, it makes reference to it ESG compliance monitoring. It is not clear how it assesses the adequacy of the

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			enterprise risk management system in managing human rights during the company's last reporting year. The assessment was either overseen by the Board Audit Committee or conducted by an independent third party. [2021 CHRB Disclosure, 2021: gmsustainability.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external 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"> • Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The 2021 CHRB Disclosure states: 'Our goal is to have our entire global workforce understand our commitments, including awareness of our Human Rights Policy and how to access it. To that end, together with our Internal Communications Team, we've developed a global communications strategy for our Human Rights Policy that leverages our internal company site (Socrates), our internal announcement and discussion platform (Yammer), our employee resource groups, leadership at each of our global plant locations and location-specific private Facebook pages as channels to reach as much of our global workforce as possible. The Human Rights Policy is available in the eight primary languages spoken across our global operating regions to promote ease of access and understanding'. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: In the 2019 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 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'. Similarly, the 2021 CHRB Disclosure states: 'We communicate policy commitments to suppliers through our Supplier Code of Conduct, which is incorporated with our standard purchase order contracts. Importantly, the Code also incorporates by reference the ILO Core Conventions that are part of our Human Rights Policy. We require our suppliers to cascade similar expectations through their own supply chains. Policies are available to suppliers publicly as well as through the SupplyPower supplier portal. Updates to policies are communicated through SupplyPower supplier bulletins. The publication of the Conflict Minerals and Responsible Minerals Sourcing Policies was communicated to suppliers via a SupplyPower Bulletin alerting Tier I suppliers of the new policies and highlighting major changes. The publication of the new Supplier Code of Conduct was communicated via a SupplyPower Bulletin as well as a Supplier Business'. [2021 CHRB Disclosure, 2021: gmsustainability.com] & [2019 Sustainability Report, 2020: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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: gmsustainability.com] • Met: Company requires suppliers to cascade down to their suppliers: The 2021 CHRB Disclosure states: 'We communicate policy commitments to suppliers through our Supplier Code of Conduct, which is incorporated with our standard purchase order contracts. [...] We require our suppliers to cascade similar expectations through their own supply chains'. The Supplier Code of Conduct indicates: 'Suppliers will have a process to communicate these Code requirements through their supply chain and to require suppliers to adopt management systems and practices for compliance with this Code or requirements materially consistent with this Code. Upon request, suppliers will provide evidence of efforts to cascade this Code or requirements materially consistent with this Code through their supply chains'. The Code also requires suppliers 'suppliers will continually monitor and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			enforce these standards in their operations and supply chain including subcontractors'. [2021 CHRB Disclosure, 2021: gmsustainability.com] & [Supplier Code of Conduct, N/A: gmsustainability.com]
B.1.5	Training on Human Rights	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"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The 2021 Sustainability Report indicates that 'GM has partnered with the AIAG, of which we are a member, to provide training to our employees and suppliers through their Supply Chain Sustainability eLearning. The training reflects the Automotive Industry Guiding Principles, which are comprised of three pillars: Business Ethics, Environment, and Human Rights & Working Conditions. Human rights training topics include child labor and young workers, wages and benefits, working hours, forced labor, freedom of association, health and safety, harassment and non-discrimination. In 2020, 400 GM employees took the AIAG training; this number increased to 475 in 2021, covering 17 different countries within GM's global footprint. In Spring 2022, AIAG will be launching a more robust sustainability eLearning platform that expands on the content of the current training'. Moreover, the 2021 CHRB Disclosure states: 'All global salaried employees are required to complete the Code of Conduct training each year, in addition to various other annual training modules based on their role and function and complete corporate required training (CRT). All CRT courses are available to global salaried employees in eight languages (including English). New and refreshed courses are deployed annually, and we use adaptive technology that tailors the courses to an individual's job responsibilities. Trainings focused on health and safety, and diversity, equity and inclusion—all important issues addressed within our Human Rights and related policies—are significant components of the CRT. In 2022, we are working to expand the CRT to include additional content relating to human rights'. The Company has provided comments to CHRB regarding this indicator. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] • Met: Trains relevant managers including procurement: As indicated above, the 2021 CHRB Disclosure indicates: 'All global salaried employees are required to complete the Code of Conduct training each year, in addition to various other annual training modules based on their role and function and complete corporate required training (CRT). [...] Also in 2022, the Global Sustainability Strategies Team is working to deepen our internal partnerships and build capacity among employee teams in areas such as GPSC [Global Purchasing and Supply Chain] and labor relations through training and small group discussions on the UN Guiding Principles on Business and Human Rights'. [2021 CHRB Disclosure, 2021: gmsustainability.com] & [Anti-Slavery and Human Trafficking Statement __, N/A: gm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See A.1.2. • Met: Meets both requirements under score 1 • Met: Trains suppliers to meet company's HR commitment: It indicates: 'direct supply chain training is an integral component to GM's efforts to eradicate slavery and human trafficking from the supply chain. 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. The training is provided to suppliers in high-risk areas at no cost to the supplier'. [Anti-Slavery and Human Trafficking Statement __, N/A: gm.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	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"> • Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The 2021 CHRB Disclosure states: 'GM strives to work with ethical suppliers who share our values to reach our mutual ESG goals. We utilize several tools to monitor adherence to our Supplier Code of Conduct. EcoVadis is a global sustainability ratings platform that has assessed over 90,000 companies on ESG performance. We use the platform to conduct individual ESG performance assessments of our suppliers based on labor, ethics, human rights and other dimensions. The EcoVadis assessment includes evaluation of a company's policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and practices related to numerous significant human rights-related issues, such as working conditions, child labor, forced labor, human trafficking, diversity, discrimination, harassment, health and safety, and social dialogue'. However, although the Company indicates its supply chain monitoring process, it is no clear how human rights policy is monitored across its own global operations. [2021 CHRB Disclosure, 2021: gmsustainability.com]</p> <ul style="list-style-type: none"> • Met: Proportion of supply chain monitored: The 2021 CHRB Disclosure states: 'As of April 2022, over 500 GM suppliers participate in the platform, including more than 300 Strategic Supplier Engagement suppliers who represent 83% of GPSC total spend'. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Describes corrective action process: The 2021 CHRB Disclosure states: 'GM requests that suppliers participate in the EcoVadis platform in connection with its request for quotes. The GPSC Compliance Team identifies suppliers below the minimum EcoVadis score that GM deems acceptable for Ethics and Labor and Human Rights categories. Low-scoring suppliers are contacted to implement corrective actions'. The Company discloses a chart which explains the 'Ongoing Human Rights Risk Response'. It includes: 'Review EcoVadis system for suppliers below minimum threshold. [...] Inform GM champion/buyer of need to engage. [...] Conduct meeting with supplier and GM contact & agree on action items. [...] Issue corrective actions within EcoVadis. [...] Follow-up throughout corrective action process. [...] Ongoing evaluation until resolution achieved. [...] Successful resolution'. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Disclose findings and number of corrective action
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection of suppliers: The Company states that 'We are careful to select third parties who are committed to treating all workers with dignity and respect. If your work involves selecting or managing third parties, practice due diligence. Make sure they comply with our Code and the law and that they honor our commitment to respecting fundamental rights. Be vigilant. Hold them accountable and monitor their activities. If you suspect behavior that fails to meet our Code, you should notify your supervisor or report it to the internal resources referenced in our Code. We respond appropriately when we become aware of violations, up to and including termination of contract'. [Code of Conduct, 01/01/2022: investor.gm.com] • Met: HR affects on-going supplier relationships: The 2021 Sustainability Report notes: 'When we become aware of violations or alleged violations of our Supplier Code of Conduct, we respond swiftly and appropriately, up to and including the termination of business relationships'. The Supplier Code of Conduct has the Company's human rights expectations. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights: It indicates: 'When sourcing, criteria including meeting conflict mineral reporting requirements, CDP participation and EcoVadis scores are reviewed. High-scoring suppliers may be rewarded with the potential for new or extended contracts'. However, no further description of the specific positive incentives to respect human rights found. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2019 Sustainability Report, 2020: gmsustainability.com] • Met: Working with suppliers to meet HR requirements: It indicates: 'direct supply chain training is an integral component to GM's efforts to eradicate slavery and human trafficking from the supply chain. 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. The training is provided to suppliers in high-risk areas at no cost to the supplier'. [Anti-Slavery and Human Trafficking Statement __, N/A: gm.com]
B.1.8	Approach to engagement with affected stakeholders	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"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The 2021 Sustainability Report indicates: 'We engage with stakeholders through many forums. We believe it is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>important to hear directly from stakeholders, or their representatives, who may be impacted by our business'. The 2021 CHRB Disclosure states: 'We listen to and engage with them [our stakeholders] in a variety of ways [...]. As an example, healthy union relationships are built on effective communication. Our Labor Relations Team is responsible for managing relationships with the labor unions [...]. We engage with our union partners daily and provide opportunities for them to offer input into our processes. An ongoing priority is to ensure that our represented employees feel empowered as members of our global manufacturing and operations team and that their voices and ideas are heard on topics such as safety and quality improvement. Similarly, in 2021 we engaged with representatives of Indigenous mining communities in several countries, including Australia and Canada. The Development Partnership Institute facilitated these dialogues, in which we heard concerns. In response, we are actively exploring opportunities to build relationships and communication channels with communities closer to the origin of our supply chains. Through the Global Platform for Sustainable Natural Rubber (GPSNR), for example, we are actively participating in working groups with smallholder farmers to better understand their perspectives and opinions'. However, although the Company indicates it has engaged with different affected stakeholders, including engagement within the last two years, it is not clear the process by which identifies affected stakeholders with whom to engage. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses stakeholders that HRs may be affected • Met: Provides two examples of engagement with stakeholders: As indicated above: 'Our Labor Relations Team is responsible for managing relationships with the labor unions [...]. We engage with our union partners daily and provide opportunities for them to offer input into our processes. An ongoing priority is to ensure that our represented employees feel empowered as members of our global manufacturing and operations team and that their voices and ideas are heard on topics such as safety and quality improvement. Similarly, in 2021 we engaged with representatives of Indigenous mining communities in several countries, including Australia and Canada. The Development Partnership Institute facilitated these dialogues, in which we heard concerns. In response, we are actively exploring opportunities to build relationships and communication channels with communities closer to the origin of our supply chains. Through the Global Platform for Sustainable Natural Rubber (GPSNR), for example, we are actively participating in working groups with smallholder farmers to better understand their perspectives and opinions'. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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"> • Met: Identifying risks in own operations: The 2021 Sustainability Report states that it 'is engaged in a saliency assessment process. In 2021, as a part of this process, we conducted desktop research, reviewed industry analyses and began connecting with external stakeholders. We also held a series of interactive internal capacity building and exploratory workshops with leaders from across the enterprise and our geographic footprint in order to identify and prioritize potential human rights-related impacts. In the series of workshops with a cross-functional working group, we looked at our value chain, considered potential impacts to people throughout our value chain, and then considered the severity and likelihood of each impact. Through this process, the working group arrived at an initial set of potential impacts to consider. In 2022, GM will refine and validate the potentially salient human rights impacts with internal and external stakeholders'. Similar evidence is found in the 2021 CHRB Disclosure. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks through relevant business relationships: As indicated above, the 2021 Sustainability Report states that it 'is engaged in a saliency assessment process. In 2021, as a part of this process, we conducted desktop research, reviewed industry analyses and began connecting with external stakeholders. We also held a series of interactive internal capacity building and exploratory workshops with leaders from across the enterprise and our geographic footprint in order to identify and prioritize potential human rights-related impacts. In the series of workshops with a cross-functional working group, we looked at our value chain, considered potential impacts to people throughout our value chain, and then considered the severity and likelihood of each impact. Through this process, the working group arrived at an initial set of potential impacts to consider. In 2022, GM will refine and validate the potentially salient human rights impacts with internal and external stakeholders'. Similar evidence is found in the 2021 CHRB Disclosure. The process refers to the value chain. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As it is mentioned above, the 2021 Sustainability Report indicates: 'GM is engaged in a saliency assessment process. In 2021, as a part of this process, we conducted desktop research, reviewed industry analyses and began connecting with external stakeholders. We also held a series of interactive internal capacity building and exploratory workshops with leaders from across the enterprise and our geographic footprint in order to identify and prioritize potential human rights-related impacts. In the series of workshops with a cross-functional working group, we looked at our value chain, considered potential impacts to people throughout our value chain, and then considered the severity and likelihood of each impact. Through this process, the working group arrived at an initial set of potential impacts to consider. In 2022, GM will refine and validate the potentially salient human rights impacts with internal and external stakeholders'. Also, 'We recognize that effective, regular stakeholder engagements are an important part of identifying and addressing potential human rights impacts'. However, it is not clear whether due diligence process involves consultation with human rights experts. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Triggered by new circumstances: The 2021 Sustainability Report indicates: 'We view the saliency assessment process as an ongoing exercise with impacts and prioritizations that may, and likely will, change over time'. The 2021 CHRB Disclosure states: 'we actively monitor human rights issues, and when new challenges arise, we evaluate and take appropriate action. As an example, soon after Russia's invasion of Ukraine in 2022, GM suspended exports of vehicles and parts to Russia and our Russian sales company suspended sales of vehicles within Russia, going beyond the requirements of U.S. sanctions at the time. GM later took additional actions to extend the suspension of our Russian business. In addition, GM provided \$250,000 to the International Rescue Committee to help support the rapidly growing number of displaced civilians. GM also donated 50 new Tahoe vehicles to the Ukraine Ministry of Infrastructure to further civilian relief efforts, and employees joined together to donate over \$168,000, including a \$50,000 company match, to organizations including Nova Ukraine, World Central Kitchen and the International Rescue Committee'. However, although the Company indicates that it monitor Human Rights issues when facing new challenges and it provides examples of actions taken after Russian's invasion of Ukraine, no description found of how systems to identify its human rights risks and impacts are triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] • Met: Describes risks identified: See above. Although the Company does not disclose a systematic process triggered by new circumstances, it provides an example of actions taken for risks identified derived from war. [2021 CHRB Disclosure, 2021: gmsustainability.com]
B.2.2	Assessing human rights risks and impacts	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"> • Met: Describe process for assessment of HR risks and discloses salient HR issues: It indicates: 'GM is engaged in a saliency assessment process. In 2021, as a part of this process, we conducted desktop research, reviewed industry analyses and began connecting with external stakeholders. We also held a series of interactive internal capacity building and exploratory workshops with leaders from across the enterprise and our geographic footprint in order to identify and prioritize potential

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>human rights-related impacts. In the series of workshops with a cross-functional working group, we looked at our value chain, considered potential impacts to people throughout our value chain, and then considered the severity and likelihood of each impact. Through this process, the working group arrived at an initial set of potential impacts to consider. In 2022, GM will refine and validate the potentially salient human rights impacts with internal and external stakeholders. (...) The results from our initial saliency assessment workshops are an important jumping off point that we will build upon. We recognize that effective, regular stakeholder engagements are an important part of identifying and addressing potential human rights impacts. We view the saliency assessment process as an ongoing exercise with impacts and prioritizations that may, and likely will, change over time'. Similar information is found in the 2021 CHRB Disclosure. As indicated, the process involved leaders from different geographic locations, taking geographic footprint into account. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com]</p> <ul style="list-style-type: none"> • Met: How process applies to supply chain: As indicated above, the 2021 Sustainability Report explains: 'GM is engaged in a saliency assessment process. In 2021, as a part of this process, we conducted desktop research, reviewed industry analyses and began connecting with external stakeholders. We also held a series of interactive internal capacity building and exploratory workshops with leaders from across the enterprise and our geographic footprint in order to identify and prioritize potential human rights-related impacts. In the series of workshops with a cross-functional working group, we looked at our value chain, considered potential impacts to people throughout our value chain, and then considered the severity and likelihood of each impact. Through this process, the working group arrived at an initial set of potential impacts to consider. In 2022, GM will refine and validate the potentially salient human rights impacts with internal and external stakeholders. [...] The results from our initial saliency assessment workshops are an important jumping off point that we will build upon. We recognize that effective, regular stakeholder engagements are an important part of identifying and addressing potential human rights impacts. We view the saliency assessment process as an ongoing exercise with impacts and prioritizations that may, and likely will, change over time'. Moreover, 'In 2021, we furthered our commitment to create a more sustainable supply chain by working with EcoVadis to rate and understand the sustainability performance of our supply base. EcoVadis allows us to gain visibility of the management systems suppliers have in place to support advancement of the environment, labor and human rights, ethics and sustainable procurement'. Similar information is found in the 2021 CHRB Disclosure. As indicated, the process involved leaders from different geographic locations, taking geographic footprint into account. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] • Met: Public disclosure of the results of HR assessment: Although the Company does not fully describe a human rights assessment process followed including how different factors taken into account, it discloses, in its 2021 CHRB Disclosure, its potential salient Human Rights impacts: Livelihoods and wages; Health and safety impacts; Freedom of association; Forced labor; Discrimination; Child labor; Barriers to inclusion; Working conditions among others. The risk above stated are found in the workplace and in its supply chain. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment: As indicated above, the Company states that 'We recognize that effective, regular stakeholder engagements are an important part of identifying and addressing potential human rights impacts'. However, no further details found including how affected stakeholders were actually involved in the saliency assessment.
B.2.3	Integrating and acting on human rights risks and impact assessments	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"> • Not Met: Action Plans to mitigate risks: The 2021 Sustainability Report indicates: 'In the near future, we plan to take a closer look at our salient issues to gain additional understanding of the risks. In parallel with developing action plans, we intend to build out management systems to enhance understanding, ownership and accountability over our salient issues'. The 2021 CHRB Disclosure states: 'While we recognize that nearly all of the potential impacts identified are by nature systemic, and not limited to GM or even the automotive industry, we take seriously our responsibility to work to identify, prevent, mitigate and remediate potential human rights impacts to which we may contribute, as detailed in our Human Rights Policy. The results from our initial saliency assessment workshops are an important

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>starting point on which we will build. We recognize that effective, regular stakeholder engagements are an important part of identifying and addressing potential human rights impacts'. However, although the Company discloses future plans and recognises the importance of the results saliency assessment workshops and of a regular stakeholder engagement, no further description found of its global system to prevent, mitigate or remediate its salient human rights issues. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com]</p> <ul style="list-style-type: none"> • Not Met: Description of how global system applies to 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: gmsustainability.com] • Met: Example of actions decided on at least 1 salient HR issues: According to the Anti-Slavery and Human Trafficking Statement: 'direct supply chain training is an integral component to GM's efforts to eradicate slavery and human trafficking from the supply chain. 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. The training is provided to suppliers in high-risk areas at no cost to the supplier'. Moreover, the 2021 Sustainability Report notes: 'GM is committed to supporting communities in which we source minerals. For example, we recently became members of the Pact Youth Apprenticeship Program in the Democratic Republic of the Congo. Pact implements various programs in the Lualaba province with the aim of reducing child labor in mining. These activities include community sensitization, positive parenting training, coordination of community stakeholders and strengthening of civil society organizations'. [Anti-Slavery and Human Trafficking Statement, N/A: gm.com] & [2021 Sustainability Report, 10/03/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	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"> • Met: System for tracking or monitor if actions taken are effective: The 2021 CHRB Disclosure states: 'GM has already deployed several systems for monitoring and evaluation purposes. To track workforce perceptions of inclusivity, we use our global Workplace of Choice survey, which goes to all employees. The full survey is conducted every two years in addition to shorter pulse surveys throughout the year. In 2021, for instance, over 75,000 global salaried and represented employees provided feedback. GM uses a comprehensive Workplace Safety System, which includes a global safety data management system that is used to report, collect and analyze safety information. This data provides us meaningful information to develop risk mitigation plans that address issues, like hazards, with the most repetitive exposure, the most repetitive type of injuries, and the most repetitive gaps detected during safety tours. [...] In addition, GM leverages the Manufacturing Excellence Indexes (MEI) system. MEI is an internal GM scoring tool to benchmark GM operations performance against internal facilities. The use of real-time data provides the organization a strategic and common method to measure performance, assess risk and drive continuous improvement. In addition to these various tools used to monitor potential impacts across our own operations, GM uses EcoVadis, as detailed throughout this disclosure, to monitor and evaluate suppliers. With this platform, we seek to understand both individual performance and progress as well as broader, cross-supplier trends'. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Lessons learnt from checking system effectiveness: It indicates: 'We will use the findings from our saliency assessment to further strengthen our strategy as we continue to evolve our management of potential human rights impacts'.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However, no example found of the lessons learned while tracking the effectiveness of its actions on at least one of its salient human rights issues as a result of its due diligence process. [2021 Sustainability Report, 10/03/2021: gmsustainability.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights impacts	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"> • Not Met: Provides two examples of comms with stakeholders: The Company indicates that: 'healthy union relationships are built on effective communication. Our Labor Relations Team is responsible for managing relationships with the labor unions that represent 99% of our global hourly workforce and 61% of our total global workforce. We engage with our union partners daily and provide opportunities for them to offer input into our processes. An ongoing priority is to ensure that our represented employees feel empowered as members of our global manufacturing and operations team and that their voices and ideas are heard on topics such as safety and quality improvement. Similarly, in 2021 we engaged with representatives of Indigenous mining communities in several countries, including Australia and Canada. The Development Partnership Institute facilitated these dialogues, in which we heard concerns. In response, we are actively exploring opportunities to build relationships and communication channels with communities closer to the origin of our supply chains. Through the Global Platform for Sustainable Natural Rubber (GPSNR), for example, we are actively participating in working groups with smallholder farmers to better understand their perspectives and opinions'. However, although the Company provides examples of engagement with different stakeholders, this indicator looks for two examples demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. It focuses on how the Companies ensure meaningful info reach affected stakeholders, how it responds, in communication terms, to issues raised by stakeholders and about their access to those communications. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe challenges to effective comms and how it is working to address them: The 2021 CHRB Disclosure states: 'Global automotive supply chains are large, highly complicated and have a long history of opacity, with information on suppliers and sourcing regions frequently considered trade secrets and closely guarded for competitive reasons. As a result, communication with individuals who work multiple tiers upstream within our supply chain is difficult. We want to hear from these workers and believe that, in some cases, they may want to report grievances and share their experiences and perspectives with us. Multiple tiers of supplier companies in between, however, are not always interested in facilitating or sharing information to make such communication possible. Among the ways we address this challenge are: Strengthening the expectation in our Supplier Code of Conduct that suppliers share information about how to access our Awareline with their workers or establish their own grievance mechanism, and to cascade this expectation to their own suppliers. [...] Joining multistakeholder initiatives similar to the GPSNR and working with convening organizations such as the Development Partnership Institute. [...] Participating in the RBA's Worker Voice Platform. [...] Investing in supply chain traceability and transparency solutions to gain greater visibility into our supply chains'. [2021 CHRB Disclosure, 2021: gmsustainability.com]

C. Remedies and Grievance Mechanisms (20% 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • 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, 01/01/2022: investor.gm.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The 2021 Sustainability Report indicates that 'Reports can be made in more than a dozen languages'. Also, 'Our goal is to have our entire global workforce understand our commitments, including awareness of our Human Rights Policy and how to access it. (...) we've developed a global communications strategy for our Human Rights Policy that leverages our internal company site (Socrates), our internal announcement and discussion platform (Yammer), our employee resource groups, leadership at each of our global plant locations and location-specific private Facebook pages as channels to reach as much of our global workforce as possible'. The Human Rights Policy contains information about the Company's grievance mechanism. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Supplier Code of Conduct indicates: 'Suppliers will provide a clearly communicated grievance mechanism, in local languages, for workers to utilize to report integrity concerns, human rights concerns, safety issues, and misconduct without fear of reprisal'. [Supplier Code of Conduct, N/A: gmsustainability.com] • Met: Expect Suppliers to convey expectation to their own suppliers: The Supplier Code of Conduct indicates: 'Suppliers will provide a clearly communicated grievance mechanism, in local languages, for workers to utilize to report integrity concerns, human rights concerns, safety issues, and misconduct without fear of reprisal'. It also notes: 'Suppliers will cascade these expectations through their own supply chain'. [Supplier Code of Conduct, N/A: gmsustainability.com]
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"> • 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: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The mechanism is accessible online 'in more than a dozen languages'. However, it is not clear how affected external stakeholders are made aware of this service. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] • Met: Communities access mechanism direct or through suppliers: The Supplier Code of Conduct indicates: 'Suppliers will also have a process in place for subcontractors and the community associated with the supplier's operations to raise concerns to the supplier'. [Supplier Code of Conduct, N/A: gmsustainability.com] • Met: Expect supplier to convey expectation to their own suppliers: The Supplier Code of Conduct indicates: 'Suppliers will also have a process in place for subcontractors and the community associated with the supplier's operations to raise concerns to the supplier. [...] Suppliers will cascade these expectations through their own supply chain'. [Supplier Code of Conduct, N/A: gmsustainability.com]
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"> • Not Met: Engages users to create or assess system: Regarding grievance mechanisms, the Supplier Code of Conduct indicates: 'When creating such mechanisms, suppliers should consult potential or actual users on the design, implementation, or performance of the mechanism'. However, it is not clear how the Company itself engages with potential or actual users on the design and performance of the mechanism(s) (such as on scope, methods of raising grievances, etc). The Company has provided additional source in its feedback to CHRB, however, no evidence found. [Supplier Code of Conduct, N/A: gmsustainability.com] • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/c	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"> • Met: Response timescales and how complainants will be informed: Regarding its grievance mechanism, the Company indicates that 'When an individual files a

Indicator Code	Indicator name	Score (out of 2)	Explanation
	channel(s) are equitable, publicly available and explained		<p>report through the AIMS website or call center, they receive a unique username and are asked to choose a password. They can return to the AIMS system again either through the website or a phone call to access the original report and add more detail or answer questions posed by a company representative to help resolve open issues. [...] Allegations of misconduct are reviewed and prioritized based on a number of factors, including the type of misconduct, the position of the alleged wrongdoer within the company and whether the allegation entails any potential violations of law. [...] The timeline for addressing complaints, informing the complainant and communicating potential outcomes is determined on a case-by-case basis, depending on the nature of the allegation and evidence available. Our process requires contact with the complainant at the outset and conclusion of the investigation. For concerns reported to the Speak Up For Safety Program, our dedicated safety team funnels concerns to the appropriate departments where they are evaluated, addressed and, where necessary, escalated'. The Code of Conduct indicates: 'We encourage you to provide your name and contact information to better assist the investigative process. If you provide your name and contact information, it is likely you will be contacted directly by the assigned investigator. If you provide contact information, you may also receive feedback on the investigation results directly from a company representative on a case-by-case basis'. [Code of Conduct, 01/01/2022: investor.gm.com] & [2021 CHR B Disclosure, 2021: gmsustainability.com]</p> <ul style="list-style-type: none"> • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level: It also states that 'High-priority cases receive special scrutiny and review; a cross-functional committee meets monthly to discuss their investigative progress and resolution. There is also a quarterly review process to determine which cases, if any, require reporting to the Board or Audit Committee, as well as processes in case a particular allegation requires more immediate reporting. The chief compliance officer also provides regular updates to the Audit Committee on key GM GECC priorities and accomplishments and trends in Awareline submissions and investigations. [...] Our process requires contact with the complainant at the outset and conclusion of the investigation. For concerns reported to the Speak Up For Safety Program, our dedicated safety team funnels concerns to the appropriate departments where they are evaluated, addressed and, where necessary, escalated'. However, it is not clear if escalation to more senior levels or independent third party adjudicators or mediators also entails challenging the process or outcome and that it can be done at complainant discretion. [2021 CHR B Disclosure, 2021: gmsustainability.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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"> • 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: gmsustainability.com] • Met: Practical measures to prevent retaliation: The Company indicates that 'Reports may be made anonymously, where permitted by law' [...]. 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: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: The Non Retaliation Policy indicates: 'GM will not tolerate retaliation against anyone who in good faith reports a concern about GM's operations. If you believe you have been retaliated against [...]. GM will investigate all allegations of retaliation, and take corrective action to address incidences of retaliation, up to and including termination of employment or the relationship with the offending party'. Similar evidence is found in the 2021 CHR B Disclosure. However, no further evidence found indicating that it will not retaliate against workers and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts, or against the lawyers representing them as well as the through firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it involving an allegation of human rights abuse and engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. [Non-Retaliation Policy, N/A: gmsustainability.com] & [2021 CHR B Disclosure, 2021: gmsustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Supplier Code of Conduct indicates: 'Suppliers will prohibit all forms of retaliation against those who raise concerns in good faith'. The supplier grievance channel is expected to be available to workers, subcontractors and the community associated with the supplier's operations. [Supplier Code of Conduct, N/A: gmsustainability.com]
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"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	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"> • Met: Says how it would provide remedy for victims if no adverse impact identified: The 2021 CHRB Disclosure states: 'We take seriously our responsibility to identify, prevent, mitigate and remediate human rights-related risks and impacts that we may cause or to which we may contribute. When we discover potential adverse human rights impacts, we will investigate, and where appropriate, we will engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their remediation through legitimate processes'. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact: The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material. • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) 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"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved: The 2021 CHRB Disclosure states: 'In 2021, GM received 4,170 reports to the Awareline, of which 3,048 were classified as allegations, and the remaining were suggestions, inquiries or other miscellaneous issues. GM tracks all reports of misconduct— whether made to the Awareline or through some other channel—in a case management system that facilitates efficient investigation, follow-up and compliance trend analysis'. It also discloses a list of different categories of allegations and the equivalence proportion of each category. 'Human Resources, Diversity and Workplace Respect Examples: Interpersonal conflicts, harassment, discrimination, retaliation' represent 66.8% of allegations, while 'Environment, Health and Safety Examples: Threats and violence, substance abuse, environmental concerns, workplace safety', 13.3%. However, it is not clear the number of grievances about human rights issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How lessons from mechanism improve management system • Not Met: Evaluation of the channel/mechanism and changes made as result: It also states that 'Maximizing effectiveness is a function of continuous improvement. Our grievance mechanisms become stronger through modifications to administrative and investigative processes that enhance program efficiency and effectiveness based on regular reviews by internal control functions and GM management'. However, although the Company indicates process to review the effectiveness of the grievance mechanism and points out that there are modifications to administrative and investigative processes, no example of any specific change made to improve it based on the review found. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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"> • Met: Pays living wage or sets target date: The Company indicates that 'GM pays a living wage'. [2019 Sustainability Report, 2020: gmsustainability.com] • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Met: Paying living wage: The Company indicates that 'GM pays a living wage.' [2019 Sustainability Report, 2020: gmsustainability.com] • Not Met: Definition of living wage reviewed with unions
D.5.1.b	Living wage (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"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Supplier Code of Conduct indicates: 'Suppliers and their employment agencies will pay wages and provide benefits and compensation to workers that comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours, medical leave, and legally mandated benefits, and in line with Article 7 of the International Covenant on Economic, Social and Cultural Rights. [...] Workers shall receive equal pay for equal work, including paying a fair wage that meets or exceeds legal minimum standards. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Supplier Code of Conduct, N/A: gmsustainability.com] • 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: gm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.5.2	Aligning purchasing decisions with 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"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.5.3	Mapping and disclosing 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"> • Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): 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: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.4.a	Prohibition of child labour: Age verification and corrective actions (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"> • Met: Does not use child labour: It indicates: 'General Motors commits to respect these rights, which are: (...) The effective abolition of child labor'. [Human Rights Policy, 08/2021: gmsustainability.com] • Not Met: Age verification of workers recruited: The 2021 CHRB Disclosure states: 'GM takes affirmative steps to avoid unlawfully hiring underage workers. For example, in the United States and Canada, applicants for hourly roles are asked to verify on their employment applications that they are at least 18 years old'. However, it is not clear age verification applies to all its operations beyond United States and Canada. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified: The 2021 CHRB Disclosure states: 'While we want to protect young people from exploitative and unlawful work, we also want to provide enriching learning and development opportunities where doing so is consistent with applicable law. That is why we offer some co-op and internship programs that may bring on high school and college students. We strive to equip them with skills, help them gain experience and unlock their professional potential'. However, it is not clear how it develops, participates in or contributes to programmes for transition from employment to education, enabling children to attend and remain in education, if and when child labour is found in its operations and how it improves working conditions for young workers where relevant. [2021 CHRB Disclosure, 2021: gmsustainability.com]
D.5.4.b	Prohibition of child labour: Age verification and corrective actions (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"> • Met: Child Labour rules in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers and their employment agencies will not use child labor. [...] Suppliers will implement an appropriate mechanism to verify that the age of workers and workers recruited comply with the ILO Minimum Age Convention (No. 138) and will provide substantiation of this verification upon request. If child labor is discovered in its supply chain, suppliers will cease employment of the child/children and take reasonable measures to enroll the child/children in a remediation/education program. Suppliers will not use workers under the age of 18 ("young workers") to perform work that is likely to jeopardize their health or safety. If young workers are found to be involved in work that is likely to jeopardize their health or safety, suppliers will take reasonable measures to immediately remove the young workers from the situation and provide alternative work that is age appropriate'. [Supplier Code of Conduct, N/A: gmsustainability.com] • 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: gm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.5.5.a	Prohibition of forced labour: Recruitment fees and costs (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"> • Met: Job seekers and workers do not pay recruitment fee: It indicates: 'We employ ethical recruitment practices and prohibit recruiters from charging recruitment fees to potential employees'. [Human Rights Policy, 08/2021: gmsustainability.com] • Not Met: Commits to fully reimbursing if they have paid: The Supplier Code of Conduct indicates: 'Suppliers will provide full reimbursement to job seekers and workers if they have been required to pay any such fees or related costs'. The 2021 CHRB Disclosure states: 'All suppliers and contractors, including recruiters, are required to adhere to our Human Rights Policy and Supplier Code of Conduct'. However, it is not clear the Company commits to fully reimbursing them if they have been required to pay any fees or related costs during recruitment in their own operations. [2021 CHRB Disclosure, 2021: gmsustainability.com] & [Supplier Code of Conduct, N/A: gmsustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters: The 2021 CHRB Disclosure states that 'We do not use labor brokers or other similar intermediaries to distribute payments'. However, it is not clear how it implements and monitors the practice of not paying any recruitment fees or related costs to secure a job and to fully reimbursing them if they have been required to pay any fees or related costs during recruitment in its own operations, particularly with employment agencies/labour brokers/recruitment intermediaries. [2021 CHRB Disclosure, 2021: gmsustainability.com]
D.5.5.b	Prohibition of forced labour: Recruitment fees and costs (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"> Met: Debt and fees rules in codes or contracts: The 2021 CHRB Disclosure states: 'Suppliers will not require workers to pay suppliers' agents' or sub-agents' recruitment fees or other related fees for their employment. Suppliers will provide full reimbursement to job seekers and workers if they have been required to pay any such fees or related costs'. [Supplier Code of Conduct, N/A: gmsustainability.com] Met: How working with suppliers on debt & 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. [Anti-Slavery and Human Trafficking Statement, N/A: gm.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment of the number affected by payment of recruitment fees Not Met: Analysis of trends in progress made
D.5.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Pays workers in full and on time: The 2021 CHRB Disclosure states: 'GM makes every effort to pay all workers, salaried and hourly, on time and in full'. [2021 CHRB Disclosure, 2021: gmsustainability.com] Met: Payslips show any legitimate deductions: The 2021 CHRB Disclosure states: 'GM makes every effort to pay all workers, salaried and hourly, on time and in full, and to provide employees with documentation explaining their wages, such as a pay slip that accounts for any and all deductions. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: How these practices are monitored for agencies, labour brokers or recruiters: The 2021 CHRB Disclosure states: 'Our payroll team makes use of computer-based software to manage payments to our approximately 146,000 global employees. The software allows us to generate and review monthly reports to verify the proper payment of our workforce and to address pay discrepancies promptly. We do not use labor brokers or other similar intermediaries to distribute payments. Instead, we pay employees directly using verified third-party payment software'. [2021 CHRB Disclosure, 2021: gmsustainability.com]
D.5.5.d	Prohibition of forced labour: Wage practices (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"> Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers and their employment agencies will pay wages and provide benefits and compensation to workers that comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours, medical leave, and legally mandated benefits [...]. Suppliers will refrain from making any deductions from wages as a disciplinary measure or imposing any financial burdens on workers related to recruitment costs.[...] Workers must be paid directly, in a timely fashion, and in recognized currency'. However, no evidence found that it requests suppliers to pay workers in full in its contractual arrangements with suppliers or supplier code of conduct. [Supplier Code of Conduct, N/A: gmsustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with supply chain to pay workers regularly and on time: It indicates: 'GM has partnered with the AIAG, of which we are a member, to provide training to our employees and suppliers through their Supply Chain Sustainability eLearning. The training reflects the Automotive Industry Guiding Principles, which are comprised of three pillars: Business Ethics, Environment, and Human Rights & Working Conditions. Human rights training topics include (...) wages and benefits'. However, no explicit evidence found, however, in relation to paying workers in full and on time. The Company has provided an additional source to this indicator, however, no further evidence found. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.5.5.e	Prohibition of forced labour: Restrictions on workers (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"> • Met: Does not retain documents or restrict movement: The 2021 CHRB Disclosure states: 'GM does not impose restrictions on the free physical movement of our workforce. We do not retain our employees' original personal identification documents. In some instances, to comply with applicable laws, we may retain copies of employees' identification documents, but do not retain the original documents. We also do not require workers to use any specific living quarters or accommodations, company-provided or otherwise'. [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters: The 2021 CHRB Disclosure states: 'We do not use labor brokers or other similar intermediaries to distribute payments'. However, it is not clear how it implements and checks the practice of not imposing restrictions on workers movements through document retention in its operations, particularly with employment agencies/labour brokers/recruitment intermediaries. [2021 CHRB Disclosure, 2021: gmsustainability.com]
D.5.5.f	Prohibition of forced labour: Restrictions on workers (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"> • Met: Free movement rules in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers and their employment agencies will not impose restrictions on entering or exiting company-provided facilities including, if applicable, workers' dormitories or living quarters, except when lawful and necessary for safety or security purposes. Suppliers will refrain from restricting workers' movement through the retention of bank payment cards or similar arrangements for accessing wages. Suppliers will also refrain from requiring workers to use company-provided accommodation. Suppliers and their employment agencies, will not destroy, withhold, or conceal identity or immigration documents, such as government-issued identification, passports, or work permits'. [Supplier Code of Conduct, N/A: gmsustainability.com] <ul style="list-style-type: none"> • Not Met: How working with suppliers on free movement: It indicates: 'GM has partnered with the AIAG, of which we are a member, to provide training to our employees and suppliers through their Supply Chain Sustainability eLearning. The training reflects the Automotive Industry Guiding Principles, which are comprised of three pillars: Business Ethics, Environment, and Human Rights & Working Conditions. Human rights training topics include (...) forced labor'. However, no further evidence found of how it specifically works with suppliers to eliminate retention of worker's documents or other actions to physically restrict movement. The Company has provided an additional source to this indicator, however, no evidence found. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress

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)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Human Rights Policy states: 'General Motors commits to respect these rights, which are: Freedom of association and the effective recognition of the right to collective bargaining'. The 2021 Sustainability Report indicates: 'GM works with about 28 unions globally, representing approximately 99% of our represented workforce, or 61% of our total global workforce, who are covered by collective bargaining agreements'. The significant percentage of workers covered by collective bargaining agreements is taken as a proxy for not intimidating or retaliating in practice. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [Human Rights Policy, 08/2021: gmsustainability.com] • Met: Discloses % total direct operations covered by collective CB agreements: The 2021 Sustainability Report indicates: 'GM works with about 28 unions globally, representing approximately 99% of our represented workforce, or 61% of our total global workforce, who are covered by collective bargaining agreements'. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1: See above.
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"> • Met: FoA & CB rules in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers will comply with and respect all applicable laws and ILO core conventions related to the rights of workers to form and join trade unions of their own choosing, to bargain collectively, to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities. Suppliers will avoid any form of threats, intimidation, physical or legal attacks against stakeholders, including union members and union representatives, exercising their legal rights to freedom of expression, association, and peaceful assembly'. [Supplier Code of Conduct, N/A: gmsustainability.com] • 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'. The Company has provided an additional source to this indicator, however key information was already in use. [Anti-Slavery and Human Trafficking Statement__, N/A: gm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.5.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of 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"> • Met: Describes process to identify H&S risks and impacts: It indicates: 'The Employee Safety Concern Process is the most efficient way to identify and resolve workplace safety concerns. The process provides a structure for employees at manufacturing sites and office environments to report potential safety issues'. Also, 'Our global safety management system, Workplace Safety System (WSS), drives continuous improvement in all five global workplace safety dimensions: Culture, Risk Mitigation, Systems, Data and Knowledge. The system is aligned with our continuous improvement philosophy and with internationally recognized standards such as ISO 45001'. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company indicates that the Lost Workday Case Rate for GM employees in 2021 was 2.28. [2021 GRI Sustainability Report, 10/03/2022: gmsustainability.com] • Met: Discloses Fatalities for last reporting period: The 2021 Sustainability Report indicates that there were zero fatalities in 2021. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] • Not Met: Occupational disease rate for last reporting period: The 2021 Sustainability Report discloses figures for Occupational Illness and Injuries in 2021: 25. However, this subindicator looks for evidence in relation to disease rate. [2021 Sustainability Report, 10/03/2021: gmsustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company indicates: 'Our target is zero, so that every person who enters a GM facility leaves safe and unharmed'. However, no further targets found related to injury rates or lost days (or near miss frequency rate) and occupational disease rates for the last reporting period. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] • Not Met: Met targets or explain why not or what is doing to improve management systems: As it is mentioned above, the Company indicates that it has had 2 fatalities in the last reporting year, which means the fatality target has not been met [zero fatalities]. However, no targets found related to injury rates or lost days (or near miss frequency rate) and occupational disease rates. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2019 Sustainability Report, 2020: gmsustainability.com]
D.5.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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"> • Met: Sets out clear Health and Safety requirements: The Supplier Code of Conduct indicates that regarding workplace: '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: gmsustainability.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period: The Company discloses its Lost Workday Case Rate for contractors in 2021: 0.33. However, it is not clear it includes workers at suppliers. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] • Not Met: Fatalities disclosures for lasting reporting period: The fatalities for GM Employees and Contractors in 2021 was 2. However, it is not clear the figures for fatalities for last reporting period specifically for its supply chain. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S: It indicates: 'GM has partnered with the AIAG, of which we are a member, to provide training to our employees and suppliers through their Supply Chain Sustainability eLearning. The training reflects the Automotive Industry Guiding Principles, which are comprised of three pillars: Business Ethics, Environment, and Human Rights & Working Conditions. Human rights training topics include (...) health and safety'. However, no further description of the training found. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2019 Sustainability Report, 2020: gmsustainability.com] • Not Met: Assessment of the number affected by H&S issues in the SP • 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: gmsustainability.com]
D.5.8.a	Women's rights (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"> • Met: Process to stop harassment and violence against women: The Company indicates in its Human Rights Policy: 'We view diversity and inclusion as a strength. We respect what each individual brings to our team. We will not tolerate harassment or discrimination on the basis of [...] gender identity or expression, [...] or any other protected class'. The 2021 CHRB Disclosure states: 'GM prohibits unlawful discrimination and harassment based on protected characteristics, including gender, and prohibits retaliation, intimidation, harassment and violence in the workplace. Allegations of behavior inconsistent with these policies, including allegations of inappropriate acts targeting women, reported through our various reporting mechanisms or otherwise, are investigated and addressed accordingly. Employees determined to have engaged in such behaviors are subject to discipline, up to and including termination of employment. Similarly, local and national contract agreements with our union partners prohibit unlawful discrimination, harassment, intimidation and violence based on protected characteristics including gender'. [Human Rights Policy, 08/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Working conditions take account of gender: The 2021 CHRB Disclosure states: 'we recognize that there may be different work expectations and impacts that are linked to gender-related issues, including accommodations for parental leave, fertility treatments, adoption and surrogacy among others'. However, although the Company recognises that gender-related issues may have an impact, it is not clear how it takes into account differential impacts on women and men of working conditions, including to reproductive health. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2021 CHRB Disclosure states: 'We are committed to equal pay practices. Our commitment to the Equal Pay Pledge reflects the value we place on pay equity and our shared belief that employees' protected characteristics should not factor into compensation decisions. As part of this commitment, GM has a rigorous annual process that measures pay equity and makes adjustments whenever unaccounted-for discrepancies are found'. Moreover, according to its 2021 Sustainability Report: 'GM has long been a global leader in advocating for women's equity in the workplace. In 2021, women were in 31.9% of our top management positions within two levels of the CEO. The Bloomberg Gender-Equality Index is among the organizations that have recognized GM as a leader in gender equity'. However, pay equity refers to equal pay for work of equal value. This datapoint looks for evidence in relation to pay gap. It is not clear the measures and steps it takes to address any gender pay gap throughout all levels of employment. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meet all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.5.8.b	Women's rights (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"> • Met: Women's rights in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers will commit to protect the rights of vulnerable groups within their businesses and supply chains, particularly the rights of women, [...]. Suppliers will develop and implement internal measures to provide equal pay and opportunities throughout all levels of employment. Suppliers will also implement measures to address health and safety concerns that are particularly prevalent among women workers, including, but not limited to, preventing sexual harassment, offering physical security, and providing reasonable accommodation for nursing mothers'. [Supplier Code of Conduct, N/A: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made: The 2021 CHRB Disclosure states: 'EcoVadis rates our enrolled suppliers in a program that tracks their percentage of women workers as well as their health and safety programs. RBA audits include the element of removing pregnant women and nursing mothers from working conditions with high hazards, to minimize any workplace health and safety risks to pregnant women and nursing mothers and to provide reasonable accommodations for nursing mothers'. However, no analysis of trends demonstrating progress found. [2021 CHRB Disclosure, 2021: gmsustainability.com]
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"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: The Human Rights Policy indicates: 'we are committed to the following [...] We will comply with all applicable laws concerning working hours'. Similarly, the 2021 CHRB Disclosure states: 'GM follows all applicable laws and regulations regarding working hours'. However, it is not clear it respects applicable international standards concerning maximum hours and minimum breaks and rest periods in its own operations. The Company has provided an additional source to this indicator, however, it refers to supplier provisions. [Human Rights Policy, 08/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assesses ability to comply with its commitments when allocating work/targets • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.9.b	Working hours (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"> • Not Met: Working hours in codes or contracts: The Supplier Code of Conduct indicates: 'Suppliers will comply with local laws and collective bargaining agreements (where applicable) regarding working hours. Working hours must not exceed the maximum set by local law'. However, no evidence found, in its Supplier Code of Conduct or contractual arrangements, of supplier requirement to respect applicable international standards concerning maximum hours and minimum breaks and rest periods (or that regular working week should not exceed 48 hours in places where local law is not more restrictive). [Supplier Code of Conduct, N/A: gmsustainability.com] • 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'. The Company has provided an additional source to this indicator, however key information was already in use. [Anti-Slavery and Human Trafficking Statement __, N/A: gm.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.5.10.a	Responsible Mineral Sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	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"> • Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Supplier Code of Conduct states: 'Suppliers will implement a policy committing to the responsible sourcing of all minerals and materials in line with GM's Conflict Minerals Policy and Responsible Minerals Sourcing Policy. These policies require conducting due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including its current supplements on tin, tantalum, tungsten and gold (3TG)'. The 2021 CHRB Disclosure states: 'We communicate policy commitments to suppliers through our Supplier Code of Conduct, which is incorporated with our standard purchase order contracts'. [Supplier Code of Conduct, N/A: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Works with smelters/refiners and suppliers to build capacity: The 2021 CHRB Disclosure states: 'We aim to work with suppliers through the tiers of our supply chain to identify nonconformance with our policies and Code of Conduct to build capacity and remedy nonconformance. If we cannot find an avenue to mitigate the risk, we will then re-evaluate the business relationship. We work with our suppliers regularly to provide education and awareness, including training, webinars and supplier bulletins. We are active in AIAG Responsible Materials Work Group, which works on common automotive industry solutions with other OEMs and suppliers regarding conflict minerals and high-risk materials. In 2021, we joined the Initiative for Responsible Mining Assurance, a third-party certification of industrial mine sites for mined materials and the RCS Global Better Mining Initiative for third-party certification of small and artisanal mines'. However, although the Company indicates it works with suppliers, no description found of how it works with smelters/refiners and with suppliers to contribute to building their capacity specifically in risk assessment and improving their due diligence performance (including through industry-wide initiatives). [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Contractual requirement to disclosure smelter/refiner information: The Supplier Code of Conduct states: 'Suppliers will disclose to GM, as necessary, updated smelter/refiner information for any 3TG mineral used in the production of its parts, materials, components, and products. Suppliers will also engage with sub-tier suppliers to conduct due diligence by providing reporting templates or other information upon request'. The 2021 CHRB Disclosure states: 'We communicate policy commitments to suppliers through our Supplier Code of Conduct, which is incorporated with our standard purchase order contracts'. [Supplier Code of Conduct, N/A: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Contractual requirement covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not Met: Risk identification and disclosure in line with OECD Guidance: The 2021 Sustainability Report indicates: 'To identify and mitigate human rights risk in the sourcing of these raw materials, our due diligence practices undertaken in connection with our Responsible Materials Program and our Conflict Mineral Program are aligned with the Organization for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We enjoy strong management support for conflict mineral supply chain due diligence. (...) we annually utilize the CMRT to survey 100% of Tier I suppliers with products containing tin, tungsten, tantalum and gold (3TG) to gain visibility of the smelters or refiners (SORs) of these minerals in our supply chain. In 2021, 2,602 supplier locations were considered in-scope for GM's Conflict Minerals Program, and we received responses from 94% of these suppliers. After SORs are identified, they are validated to determine whether they have passed the Responsible Minerals Assurance Process (RMAP). This process, administered through the Responsible Minerals Initiative (RMI), employs a risk-based approach to validate SORs' processes in place for responsible mineral procurement. Those SORs that have passed this assessment are considered conformant to the RMAP'. The 2021 CHRB Disclosure states: 'To identify and remediate risks of significant adverse impacts that may be associated with extracting, trading, handling and exporting minerals globally, and especially from conflict-affected and high-risk areas identified in OECD Annex 2 and our saliency assessment, in-scope suppliers must disclose to GM, as necessary, updated smelter/refiner information for any 3TG mineral used in the production of its parts, materials, components and products'. However, although the Company discloses its system to identify risks, no evidence found of risks identified (i.e what are the faced risks, the number of SORs that might pose risks, etc). [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] • Met: Identification of smelter/refiners and OECD Guidance: The Company indicates that 'We analysed 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 analyse 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'. [SD Form 2018, 31/05/2019: investor.gm.com] <p>Score 2</p> <ul style="list-style-type: none"> • 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). No further evidence found in latest review. [SD Form 2018, 31/05/2019: investor.gm.com] • Not Met: Risk identification and disclosure covers all minerals

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"> • 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. [SD Form 2018, 31/05/2019: investor.gm.com] & [2019 Sustainability Report, 2020: gmsustainability.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time: The 2021 CHRB Disclosure states: 'we act as a single point of contact on behalf of RMI for several cobalt refiners, assisting them in their efforts toward RMAP conformance. We also encourage suppliers to send outreach letters to nonconformant smelters/refiners in their smelter lists. Results of our monitoring and outreach efforts are reported to the Conflict Minerals Executive Steering Committee'. However, no description found of the processes to monitor or track performance of risk prevention/mitigation measures. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy: The 2021 CHRB Disclosure states: '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 channels, including teleconferences, emails, publications and webinars, as well as providing direct feedback to improve reporting template detail and encourage smelter or refiner RMAP conformance'. However, while the Company indicates that it engages with suppliers and how to improve chain of custody declarations and to increase the transparency, no description found of how it engages with suppliers and affected stakeholders to agree on its strategy for risk management. [2021 CHRB Disclosure, 2021: gmsustainability.com] • Not Met: Risk management and response processes cover all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.5.11	Responsible Materials Sourcing	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"> • Not Met: Due diligence for raw materials in supplier code/contracts: The supplier code states that 'suppliers will implement a policy committing to the responsible sourcing of all minerals and materials in line with GM's Conflict Minerals Policy and Responsible Minerals Sourcing Policy'. Although this commitment includes the word 'materials', all evidence found in relation to these requirements refer to the 3TG contained in these materials, parts and components. No evidence found of a requirement to conduct due diligence for raw materials such as leather, rubber, lithium, etc. • Met: Works with suppliers to build capacity in risk assessment and due diligence: In its 2021 Sustainability Report, the Company discloses various actions and collaborations involving different raw material suppliers, such as plastics, steel and aluminium, natural rubber, ev battery materials and textiles. Regarding the sourcing of natural rubber, the 2021 CHRB Disclosure states: 'Recognizing the importance of taking action to limit the social and environmental impacts from natural rubber production, GM became the first automaker to commit to sustainable natural rubber in 2017, and in 2018 became a founding member of the Global Platform for Sustainable Natural Rubber (GPSNR). GPSNR is an international, multistakeholder organization with a mission to lead improvements in the socioeconomic and environmental performance of the natural rubber value chain. The initiative now has more than 100 members, including OEMs; tire manufacturers; rubber producers, processors and traders; nongovernmental organizations; and smallholder farmers, many of whom also held a collaborative role in the group's creation. GM currently sits on GPSNR's Executive Committee with representatives from suppliers, civil society organizations and smallholder producers. GM also actively participates in the Policy Toolbox Working Group, through which we work with NGOs and suppliers on crafting specific policy commitments and disclosures that company members are expected to adopt. One of the group's most significant accomplishments was to create a members' sustainability policy framework two years ago. All members are expected to adhere to this framework, which covers economic, social and environmental aspects of sustainability and is designed to help protect ecological health, local livelihoods and fundamental human rights. In 2022, GM also published our own Sustainable Natural Rubber Policy. GPSNR also offers a grievance mechanism for stakeholders to express concerns about GPSNR members, resolve disputes and provide a remedy to impacted parties'. [2021 Sustainability Report, 10/03/2021: gmsustainability.com] & [2021 CHRB Disclosure, 2021: gmsustainability.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Identify the sources of high-risk raw materials in its supply chain: The 2021 CHRB Disclosure states: 'GPSC's Ethical Sourcing Team has further identified farms, ranches, mines and transient labor as areas that are inherent to the general automotive supply chain and that are considered high-risk for human rights and sustainability impacts'. However, it is not clear whether it is actually identifying these sources' locations. [2021 CHRB Disclosure, 2021: gmsustainability.com]

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"> • Area: Environmental rights; land rights • Headline: General motors among others accused of abuses of Aluminium supply chains • Story: On July 22, 2021, Human Rights Watch and Inclusive Development International said in a report that Automobile companies need to do more to address abuses in their aluminium supply chains and the bauxite mines they source from. Car manufacturers used nearly a fifth of all aluminium consumed worldwide in 2019 and they are forecast to double their aluminium consumption by 2050 as they transition to electric vehicles. In its report the Human Rights Watch and Inclusive Development International describes the global supply chains that connect car manufacturers to mines, refineries, and smelters from countries including Guinea, Ghana, Brazil, China, Malaysia, and Australia. Based on meetings and correspondence with nine major car companies – General Motors among others (BMW, Daimler, Ford, Renault, Groupe PSA (now part of Stellantis), Toyota, Volkswagen, and Volvo) – Human Rights Watch and Inclusive Development International assessed how the auto industry addresses the human rights impacts of aluminium production, from the destruction of farmland and damage to water sources caused by mines and refineries to the significant carbon emissions from aluminium smelting. Although car companies’ knowledge of aluminium supply chains varies, none of the nine companies that responded to Human Rights Watch and Inclusive Development International had, prior to being contacted for this report, mapped their aluminium supply chain to understand the human rights risks within it The report also alleged despite many of the world’s leading car companies have publicly committed to addressing human rights abuses in their supply chains, they have done little to evaluate and address the human rights impact of aluminium production. They have instead prioritized supply chain due diligence for other materials central to electric vehicles, such as the cobalt needed for electric batteries. Because they involve surface level mining, bauxite mines take up a large area, often destroying farmland that underpins the livelihoods of local communities. Bauxite mines can also have a devastating impact on rivers, streams, and groundwater sources that communities rely upon for household consumption and irrigation. [Human Rights Watch, 22/07/2021, "Aluminum: The Car Industry’s Blind Spot": hrw.org]
E(1).1	The company has responded publicly to the allegation	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"> • Not Met: Public response: The Human Rights Watch and Inclusive Development International report states that the two organisations met with General Motors. However, there is no response from General Motors in the report and there is no available evidence that the company has responded publicly to the report or the allegations. [Human Rights Watch, 22/07/2021: hrw.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(1).2	The company has investigated and 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"> • Not Met: Engaged with stakeholders: Although in its Supplier Code of Conduct, GM states that it requires its suppliers to engage with stakeholders, there is no evidence that GM has engaged with affected stakeholders in the regard to this allegation. [Supplier Code of Conduct, N/A: gmsustainability.com] • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The Human Rights Watch and Inclusive Development International report states, “Eight of the nine car companies [including General Motors] who responded to Human Rights Watch and Inclusive Development International said they have taken at least some steps to specifically address the risk of human rights abuses in their supply of cobalt.” However, there is no evidence available that the company has implemented improvements or reinforced its management system in response to the allegations. [Supplier Code of Conduct, N/A: gmsustainability.com] • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to	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"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link

Indicator Code	Indicator name	Score (out of 2)	Explanation
	provide for or cooperate in remedy(ies)		<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Forced labour; discrimination <p>• Headline: GM among companies accused of using suppliers linked to forced labour in China</p> <p>• Story: On March 1, 2020, the Australian Strategic Policy Institute (ASPI) released a report that named General Motors among 83 other companies benefiting from the use of potentially abuse labour transfer programs. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories to work under conditions that strongly suggest forced labour for suppliers of several multinational's supply chains. ASPIC used open-source public documents, satellite imagery, and media reports and identified 27 factories in nine Chinese provinces that have used transferred labourers. It is also alleged that Muslim minorities are thought to be working in forced labour conditions across the country. The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers.</p> <p>On July 20, 2020, O-Film subsidiary Nanchang, a General Motors supplier, was one of the eleven companies blacklisted by the U.S. Department of Commerce's Bureau of Industry and Security over alleged human rights abuses involving Uighur Muslims in China.</p> <p>According to the U.S. Department of Commerce, the O-Film subsidiary was named on the list "in connection with the forced labour of Uighurs and other Muslim minority groups in western China". Companies on the list must apply for special licenses to access U.S. technologies.</p> <p>[ABC, 01/03/2020, "Apple, Nike and other major companies implicated in Muslim forced labour in China": abc.net.au] [Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": aspi.org.au] [The Guardian, 01/03/2020, "China transferred detained Uighurs to factories used by global brands – report": theguardian.com] [Cnet, 20/07/2020, "US accuses supplier for Amazon, Apple, Dell, GM, Microsoft of human rights abuses": cnet.com]</p>
E(2).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In response to the allegation, the company stated: "On March 1, 2020 the Australian Strategic Policy Institute (ASPI), a respected think tank, released a study alleging that 83 Chinese and multinational companies utilized Uyghurs — a Turkic Muslim minority in China's northwest Xinjiang province — for forced labor in Chinese supply chains. GM, as well as other notable brands, were implicated in the report. <p>When we become aware of violations to our Code of Conduct, we are committed to responding appropriately, up to and including the termination of business relationships. In this instance, within 12 days of the study release, our Global Purchasing and Supply Chain team investigated the alleged supplier, re-sourced two components to other suppliers and subsequently cancelled the contract". [2019 Sustainability Report, 2020: gmsustainability.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: In response to the allegation, the company addresses both the forced labour and discrimination issue. It also speaks to the problem affecting its supply chain. [2019 Sustainability Report, 2020: gmsustainability.com]
E(2).2	The Company has appropriate policies in place	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"> • Not Met: Engaged with stakeholders: The company provided feedback for this indicator mentioning its Sustainability Report. In the report the company made sure that cancelled the contract with the supply chain in China's northwest Xinjiang province. However, General Motors did not engage with affected stakeholders. [2019 Sustainability Report, 2020: gmsustainability.com] • Not Met: Identified cause: The company stated that: "When we become aware of violations to our Code of Conduct, we are committed to responding appropriately, up to and including the termination of business relationships. In this

Indicator Code	Indicator name	Score (out of 2)	Explanation
			instance, within 12 days of the study release, our Global Purchasing and Supply Chain team investigated the alleged supplier, re-sourced two components to other suppliers and subsequently cancelled the contract". However, this study case is not publicly available. [2019 Sustainability Report, 2020: gmsustainability.com] Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company provided feedback to CHRB and it stated that cancelled the contract with the supply chain in China's northwest Xinjiang province. However, General Motors did not disclose whether changes to the management system as such were made. • Not Met: Stakeholder input to steps taken
E(2).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy: The company provided feedback for this indicator mentioning its Sustainability Report, however, it was found not relevant for the assessment as General Motors did not provide a remedy to the specific allegation. • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The company provided feedback for this indicator mentioning its Sustainability Report, however, it was found not relevant for the assessment as General Motors did not provide a remedy to the specific allegation. • Not Met: Remedy delivered: The company provided feedback for this indicator mentioning its Sustainability Report, however, it was found not relevant for the assessment as General Motors did not provide a remedy to the specific allegation. • Not Met: Independent remedy process used

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.

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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.

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