

# GENERAL MOTORS

## Global Environmental Policy

General Motors Company (GM) is proud of its long-standing commitment to protect human health and the environment. As a responsible corporate citizen, we continually assess the environmental impacts of our activities, products and services as a basis for our Global Environmental Policy and are committed to reducing or eliminating wherever practicable these impacts through the establishment of appropriate objectives and targets. This policy establishes a globally consistent standard intended to protect the environment by establishing sound design, engineering, manufacturing and distribution practices that support compliance while minimizing negative environmental impacts.

GM's Guiding Environmental Commitments, within this document, are the foundation of this policy and were established from the core Environmental Principles and values that were in place for more than 25 years. GM's Guiding Environmental Commitments now serve as a guide for all GM employees worldwide.

### UNITED NATIONS GLOBAL COMPACT

In 2015, GM became a signatory to the United Nations Global Compact, which endorses a framework of principles in the areas of human rights, labor, the environment, and anti-corruption. GM's commitment supports the Global Compact's ten principles and the company's intent to maintain the principles and to evaluate related global best practices that may be applicable to GM. Of these ten principles, Environment is specifically tied to Principles 7, 8 and 9, which state:

- UNGC Principle 7 – Businesses should support a precautionary approach to environmental challenges.
- UNGC Principle 8 – Businesses should undertake initiatives to promote greater environmental responsibility.
- UNGC Principle 9 – Businesses should encourage the development and diffusion of environmentally friendly technologies.

### APPLICABILITY

This Environmental Policy applies globally to all of GM's employees and its operations, consultants, agents, sales representatives, distributors, independent contractors, and contract workers when they perform work for GM.

### GM'S GUIDING ENVIRONMENTAL COMMITMENTS

GM's Guiding Environmental Commitments encourage environmental consciousness in both daily conduct and in the planning of future products and programs. The Guiding Environmental Commitments support and embrace GM's purpose, values and our vision of a future world with zero crashes, zero emissions and zero congestion.

## GM'S GUIDING ENVIRONMENTAL COMMITMENTS

### Taking Care of our Planet

**We are committed to actions that restore and preserve the environment.**

*We are dedicated to:*

- Preventing deforestation, conserving water, caring for natural resources in and around our facilities and the communities where we operate.

### Waste Reduction

**We are committed to reducing waste and pollutants while conserving resources and recycling materials at every stage of the product life cycle.**

*We aspire to be a zero waste company by:*

- Treating waste as a resource out of place.
- Promoting landfill free practices in all our operations and at all our sites.
- Advancing a circular economy/circularity by eliminating waste and designing for continued use.
- Beneficially reusing byproducts generated at our facilities.
- Incorporating sustainable materials management and the increasing use of recycled content in our products and processes.

### Water Conservation and Quality

**We are committed to responsibly using water while taking actions that preserve water quality and conservation across our operations, in our supply chain, and in the communities in which we operate.**

*We will act by:*

- Reducing water used in our operations and being mindful of how our water use affects our communities.
- Communicating best practices on our water reduction and reuse initiatives globally.
- Listening to our employees on ways to conserve water.

### Greenhouse Gas Emissions & Climate Change

**We believe climate change is real and are committed to the public disclosure of our greenhouse gas emissions and taking actions to reduce them.**

*We are dedicated to:*

- Consistently making clear our position on climate action with our global employees, supply chain, and other stakeholders, including policymakers, regulators and shareholders.
- Recognizing that the transportation sector is a leading contributor to global greenhouse gas emissions and our obligation to reduce them in the transition to a low carbon future.
- Publicly advocating for climate action, awareness, and policies that put a value on carbon.

## Energy Management

**We are committed to energy conservation and energy efficiency improvements throughout our global sites and operations.**

*We are dedicated to:*

- Reliable, competitive, and sustainable energy sourcing.
- Consistent energy efficiency and conservation.
- Embracing new energy efficient technologies.
- Educating our employees and our communities on energy saving initiatives.

## Renewable Energy

**We are committed to using renewable energy at our facilities and sites globally and will advocate for policies that promote renewable energy use and demand.**

*We will aggressively pursue:*

- Our commitment to use 100% renewable energy by 2050.
- Wind, solar, hydro, landfill gas and other sources of clean energy as practicable.
- Renewable energy advocacy through partnerships with NGOs, peer companies, and other stakeholders.

## Environmental Management System

**We are committed to a systemic management approach to minimizing and eliminating our environmental impacts around the world. We will consistently and continually assess the impact of our operations and our products on the environment and the communities in which we live and operate with a goal of continuous improvement.**

*Our EMS process:*

- Develops, implements, sustains, regularly assesses and improves our operations to achieve continual improvement while driving corrective and preventative actions.
- Will follow internationally recognized protocols such as ISO 14001 and be fully integrated into our global manufacturing system and other operating systems.
- Requires self-assessments to monitor compliance and conformance to regulations and policies.
- Is audited and procedures attested as conforming to the Standard through independent self-declaration reviews or certified to the Standard through third party verification of our methods.

## Improving Technologies

**We are committed to vigorously pursuing the development and implementation of technologies for minimizing pollutant emissions from products and our operations.**

*We remain focused on:*

- Reducing emissions from our manufacturing operations.
- Increasing mobile vehicle efficiencies and fuel economy.
- Leading the industry in electric mobility development and advancements.
- Innovations in manufacturing technologies.

## Environmental Stewardship

**We are committed to participating actively in educating the public regarding environmental conservation and biodiversity.**

*We remain dedicated to:*

- Protecting and promoting biodiversity through pursuing wildlife habitat certification.
- Educating the current and future workforce, particularly in the areas of science, technology, engineering and math (STEM), given the increasing level of advanced technology in the automotive industry.

## Responsible Sourcing

**We are committed to responsible sourcing and working with our suppliers to develop sustainable solutions.**

*We are devoted to:*

- Sourcing sustainable natural rubber for tires.
- Working with external stakeholders in an advisor capacity to help drive GM's global procurement leadership.

## Obeying Environmental Regulations and Policies

**We are committed to working with all government entities for the development of technically sound and financially responsible environmental laws and to complying with applicable laws and regulations.**

*We are dedicated to:*

- Complying with all applicable laws and regulations, as well as conforming to any applicable GM policies, standards, procedures and performance criteria.
- Conforming to internal Environmental Performance Criteria (EPC) in absence of equally protective laws or regulations, requiring:
  - Qualified resources and adequate budgets to be in place to manage environmental activities.
  - An environmental management system to be in place.
  - Accurate and timely environmental metrics and data through sound reporting practices.
  - Engineering controls and administrative procedures to manage wastes.
  - Management of storm water, process wastewater, and sanitary wastewater.
  - Remediation of contaminated media.
  - Evaluation of facility operations and property environmental conditions prior to real estate transactions.
  - The evaluation, and management of environmentally responsible joint ventures.
  - Installation and maintenance of structural containment to prevent releases.
  - Management of underground storage tanks and piping.
  - Performance requirements to manage air emissions generated from operations.
- Engaging internal and external stakeholders in the policy development process.

## **POLICY GOVERNANCE AND OVERSIGHT**

The Environmental Compliance Oversight Committee (ECOC) provides environmental policy governance and oversight. The ECOC is chaired by the Executive Director, Global Regulatory Affairs, Environment, Energy, and Safety Policy and the Executive Vice President of Global Manufacturing. Additional committee members include: the General Auditor, Legal Staff Environmental Practice Area Manager, and the Vice President of Sustainable Workplaces. The ECOC was formed at the direction of the GM Executive Oversight Committee

(management leadership group appointed by the Board of Directors and Chief Executive Officer) and meets at a minimum of three times per year, or as required, to establish policy direction and monitor the compliance status of GM's environmental management systems. If requested, the ECOC will periodically report out to the GM Executive Oversight Committee on the status of GM's environmental compliance. In the annual review and oversight of the environmental policy, GM is committed to engage external stakeholders in the policy development process.

## OVERSIGHT ROLES AND RESPONSIBILITIES

All employees are required to follow this policy. The following key groups provide oversight:

Public Policy Center – Responsible for driving policy development and monitoring policy implementation.

Sustainable Workplaces Eco-System Services – Budgets for and manages global environmental resources (includes corporate, regional and plant environmental staff). Develops and implements environmental procedures and control programs that support policy and compliance. Supports the development and implementation of the environmental programs and actively monitors the level of environmental compliance/conformance with legal and policy requirements.

Legal Staff – Provides legal advice to support compliance at the policy development level as well as providing support to compliance programs.

Audit Services – Responsible for periodic auditing of GM operations to ensure that effective risk and control practices are in place and operating in a globally consistent and compliant manner that at a minimum meets legal requirements and this policy.

GM Operations – Understand and comply with all applicable environmental laws and regulations, as well as any applicable GM environmental policies, procedures, standards, and performance criteria and provide appropriate resources and adequate budgets to ensure that all employees understand and execute their day-to-day environmental responsibilities. Ensure that all projects are funded to meet all GM environmental policies, procedures, standards, and performance criteria.

## PERFORMANCE SELF-ASSESSMENTS

As part of a robust management system, each GM operation must establish a process to periodically monitor the level of compliance to country specific laws and regulations and conformance to GM environmental policies, standards, procedures and performance criteria. These self-assessment activities must be capable of driving effective corrective and preventative action. Assessments must be conducted in full conformance with the requirements outlined in company procedures and the management system(s).

## RECORD KEEPING

Governmental laws and regulations require specific documents and records to be maintained. Additional record keeping requirements may be specified in operating permits, licenses, consents or by other GM policies. Record keeping requirements may include many types of records, such as incident reports, manifests, monitoring data, and training records. All GM operations must fully assess their record keeping responsibilities and implement a program that ensures a level of compliance that is accurate, truthful and complete.

## REPORTING

Certain laws require timely notification and/or reporting to government agencies for certain types of incidents (e.g., injuries, chemical releases, etc.). GM operations must understand all of its reporting obligations and ensure that a process is in place to report all compliance information timely, accurately and responsibly to corporate staffs and regulatory authorities. In addition, GM Operations must provide accurate and timely environmental metrics and data through sound reporting practices. This critical data is the basis for internal and external reporting. However, no internal corporate reporting is required as part of this policy.

## SPEAK UP FOR SAFETY

Employees responsible for compliance with environmental laws, regulations and this policy may discover issues related to safety. It is GM's expectation that employees will Speak Up for Safety, either openly or anonymously, when they become aware of a workplace or vehicle-related issue. An employee's manager is usually the best first option for reporting. Other options include local leadership, local HR/ Labor Representative, Global Ethics and Compliance Center, or Legal Staff. In cases where an individual is uncomfortable reporting through established internal channels, reports can be made using the Speak Up for Safety or the Awareline program, if appropriate to do so in their region.

## RELATED GLOBAL POLICIES

Global Dangerous Goods Transportation Policy – DGT-01  
Global Workplace Safety and Industrial Hygiene Policy – S&IH-01  
Global Environmental Performance Criteria (EPC)

Policy #: ENV-01	Policy Name Global Environmental Policy	
Effective Date: 04/24/2019	Executive in Charge: Executive Director, Global Regulatory Affairs, Environment, Energy, and Safety Policy	Policy Contact: Manager, Environmental Policy