

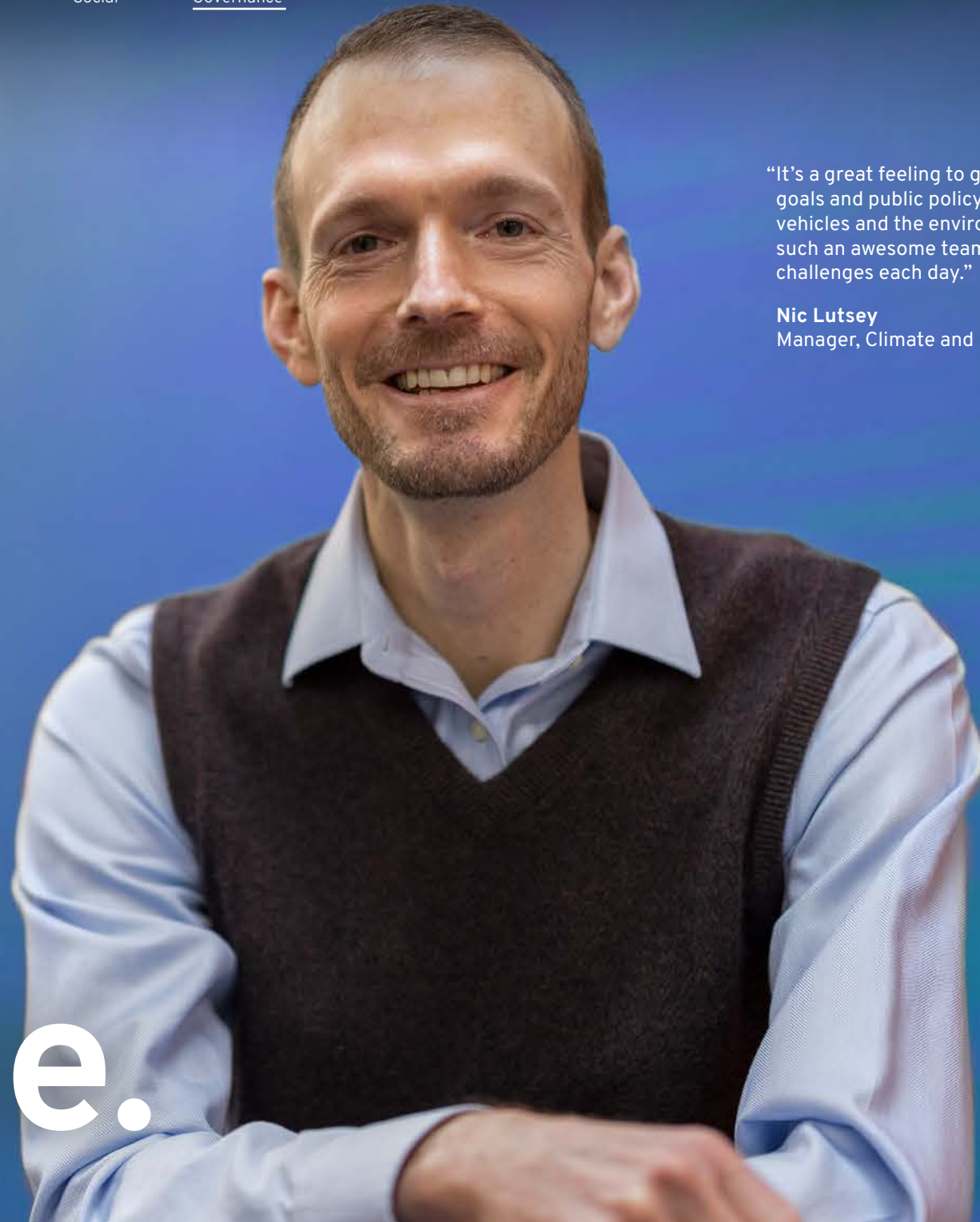


Responsible Governance

We have robust governance structures and policies in place to manage our business in a responsible and ethical way. These strengthen our company, build a strong foundation for our sustainability strategy and help us address environmental and social issues.

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“It’s a great feeling to get to align our company goals and public policy related to electric vehicles and the environment—and to have such an awesome team to work through the challenges each day.”

Nic Lutsey
Manager, Climate and Environment Policy

evidence.

Corporate Governance

The Board is elected by GM’s shareholders to oversee and provide guidance on GM’s business and affairs. It is the ultimate decision-making body of the company, except for those matters specifically reserved for shareholders.

Among other things, the Board oversees company strategy and execution of the strategic plan. In addition, it oversees management’s proper safeguarding of the assets of the company, maintenance of appropriate financial and other internal controls, proper governance and compliance with applicable laws and regulations.

The Board is committed to sound corporate governance policies and practices that are designed and routinely assessed to enable GM to operate its business responsibly, sustain our success and build long-term shareholder value. The Board also works with management to integrate environmental, social and governance (ESG) principles into the company’s business strategy. This includes agenda items and discussions related to ESG topics at Board and committee meetings.

In 2022, the Board updated GM’s [Corporate Governance Guidelines](#), Bylaws and several committee charters. Read more about these enhancements in our [2023 Proxy Statement](#).

Leadership Structure

The Board is led by our Chair and CEO, who works closely with our Independent Lead Director. The Board comprises 13 members, all of whom, with the exception of our CEO, are independent, as defined by the Board’s Corporate Governance Guidelines, which reflect the independence standards of the New York Stock Exchange and the U.S. Securities and Exchange Commission.

Governance Best Practices and Shareholder Protections

We are committed to protecting the interests of our shareholders and believe that Board independence is crucial to this work. To achieve these goals, we follow several governance structures and policies, including:

Independence

of 12 out of 13 directors



Annual

election of all directors



Strong

Independent Lead Director empowered with clearly delineated duties



Proxy

access and shareholder right to call special meetings



Majority

voting with director resignation policy in uncontested elections



Annual

review of the Board’s leadership structure by the independent directors



No

poison pill or dual-class shares








Board Diversity

GM's Board is composed of directors that have strong ESG expertise and possess a broad range of skills, qualifications and attributes that support our ambitious electric vehicle (EV) transition, growth strategy, sustainability and diversity, equity and inclusion (DEI) goals.

Board membership is 46% women, including the Chair and Independent Lead Director, with 17% identifying as racially or ethnically diverse. In addition, 50% of Board committees are chaired by women. See our [2023 Proxy Statement](#) for more information about Board composition, succession plans and perspectives on diversity.

Committee Structure and ESG Governance

The Board has six standing committees, all of which, except the Executive Committee, consist entirely of independent directors. These committees help the Board develop and oversee GM's ESG strategy, including through delegated responsibility for specific ESG-related topics.

Governance and Corporate Responsibility Committee 	Audit Committee 	Executive Compensation Committee 	Finance Committee 	Risk and Cybersecurity Committee 
<ul style="list-style-type: none"> Oversees ESG initiatives, strategies and policies that have a material impact on the company. Deploys an ESG scorecard to track progress against GM's public global sustainability targets and conducts annual reviews of ESG topics such as public policy, corporate philanthropy and other sustainability initiatives (including human rights and responsible sourcing). Responsible for the Board's shareholder engagement program. Reviews and approves the Sustainability Report. 	<ul style="list-style-type: none"> Reviews the disclosure process and control procedures over ESG disclosures. Reviews and approves the Sustainability Report. Oversees the Internal Audit function, GM Audit Services (GMAS), which provides independent, objective assurance on the effectiveness of risk management, internal controls and governance processes within GM. GMAS' annual audit plan includes coverage of controls around ESG disclosures as well as workplace and product safety, ethics and compliance, environmental and cybersecurity risks. Oversees GM's ethics and compliance program, the Global Ethics and Compliance Center (GECC), and receives regular updates from GM's chief compliance officer on a wide range of compliance topics. See Ethics. 	<ul style="list-style-type: none"> Oversees design and implementation of an executive compensation program that drives alignment with shareholder interests, encourages management to make decisions that drive long-term value creation and does not reward excessive risk-taking, and attracts, motivates and retains the talent required to accelerate GM's transition to EVs. Makes an annual determination as to whether the company's ESG and sustainability goals and milestones are effectively integrated into our compensation programs. Responds to shareholder feedback relative to the alignment of executive compensation with strong performance, including with respect to sustainability goals. 	<ul style="list-style-type: none"> Reviews changes to our shareholder composition, including the impact of ESG-oriented investors. Supports GM's sustainable finance projects, including reviewing our 2022 green bond offering and any future bond offerings connected to our Sustainable Finance Framework. 	<ul style="list-style-type: none"> Reviews GM's strategic, operational and cybersecurity risks, including workplace safety, vehicle cybersecurity safety, climate change and privacy risk. Considers climate change as part of its key strategic and operational risk management framework.

Shareholder Engagement

Members of the Board and senior management regularly engage with institutional shareholders. These engagements help us collect feedback on various topics, including strategic and financial performance, operations, products, executive compensation, and Board composition and leadership structure, as well as on important environmental and social issues. The constructive insights, experiences and ideas exchanged during these engagements have helped the Board evaluate and assess key initiatives during GM's ongoing transition to an all-electric future. Learn more about these engagements with shareholders and other stakeholders in our [2023 Proxy Statement](#).

Risk Management

The Board has overall responsibility for risk oversight and focuses on the most significant risks facing GM. It discharges these responsibilities, in part, through delegation to its committees. The company's risk governance is facilitated through a top-down and bottom-up communication structure, with our CEO serving as chief risk officer. The Senior Leadership Team appoints members to our Risk Advisory Council, an executive-level body with delegates from each business unit, to discuss and monitor the most significant business and emerging risks in a cross-functional setting. They are tasked with championing risk management practices and integrating them into their functional or regional business units. We contemplate climate-related risks in our enterprise risk framework and continuously monitor changes to our overall risk landscape. See our approach to managing climate-related risks in our [Task Force on Climate-Related Financial Disclosures \(TCFD\) Report](#).

ESG Governance

The Board oversees ESG principles throughout the enterprise and has delegated specific [ESG oversight responsibilities](#) to each of its committees.

At the management level, GM's Senior Leadership Team establishes and executes the company's ESG strategy. This cross-functional group of senior leaders drive GM's ESG initiatives throughout the company, from global product development, portfolio planning, manufacturing, and supply chain and purchasing to human resources (including DEI and other workforce matters), legal, compliance, social and community impact projects. The Senior Leadership Team is supported in this work by our Office of Sustainability and ESG Disclosure Committee.

GM's vice president sustainable workplaces and chief sustainability officer, reporting to the executive vice president of global manufacturing and sustainability, is the enterprise-wide leader for sustainability initiatives, and develops and coordinates sustainability strategy and efforts across the company. GM's chief of diversity, equity and inclusion, reporting to the senior vice president and chief people officer, is the enterprise-wide leader for DEI initiatives, and develops and coordinates DEI strategy and efforts across the company.

The Office of Sustainability is a cross-functional group that uses a "team of teams" approach to guide sustainability initiatives across the company. It is chaired by the vice president sustainable workplaces and chief sustainability officer. The ESG Disclosure Committee is a cross-functional group that oversees GM's ESG disclosures. It is chaired by our vice president global business solutions and chief accounting officer, vice president sustainable workplaces and chief sustainability officer, and assistant corporate secretary and lead counsel—corporate governance, finance and securities.

External Stakeholder Dialogue

For the past decade, our Global Sustainability Team has engaged with stakeholders through Ceres, a nonprofit organization dedicated to transforming the economy to build a sustainable future for people and the planet.

In December 2022, Ceres convened a diverse group of stakeholders to provide recommendations and feedback that we will use to inform our goals and progress on climate, mobility and connectivity, human rights, diversity and governance.

The objectives of this dialogue were to:

- Understand what actions certain stakeholders expect GM to take and what influence they expect it to exert
- Determine areas where GM is seen as a sustainability leader and should continue its current strategy
- Identify any perceived gaps to continue to enhance GM's sustainability disclosure
- Highlight evolutions in stakeholder expectations and emerging sustainability trends for GM to consider



Cybersecurity and Privacy

From electric vehicles (EVs) to connected, self-driving vehicles, transformative innovations are changing the nature of transportation and our relationships to the vehicles that move us. As connectivity becomes embedded in transport, new digital risks are emerging, making cybersecurity and data protection a critical aspect of our operations.

Cybersecurity Risks

Software and connected services are key to GM's vision of a world with zero crashes, zero emissions and zero congestion, and with the increasing connectivity of our vehicles, cybersecurity risks continue to evolve. Already, we offer OnStar and connected services to more than 21 million connected vehicles globally. Safely and securely delivering these services is possible due to a strong cybersecurity focus throughout the company.

GM's vice president, chief cybersecurity officer leads a dedicated global team that works to protect the data and digital security of our employees, customers and vehicles. GM's Cybersecurity organization was recently restructured to report to the company's executive vice president—legal, public policy, cybersecurity and strategic technology initiatives and corporate secretary to reflect the best practice of creating an independent cybersecurity office. The team is supported by the Board's Risk and Cybersecurity Committee, senior leadership across the company and a centralized cybersecurity office.

Using well-established risk frameworks and standards, we are focused on cybersecurity risks including information technology and intellectual property protection, vehicle and connected services, manufacturing safety and operations, supply chain and third-party security, merger and acquisition risks, and the secure integration of all new business models.

Cybersecurity—ensured through both hardware and software measures—is a high priority in the development of advanced driving features, semi and autonomous systems, in-market enhancements, connected services and many other software-defined services. See our [Product Cybersecurity Policy](#).

Privacy Protection

Robust privacy policies and processes are critical to protecting our employees, our customers and our business. We rely on information technology systems and networked products, some of which are managed by third parties, to process, transmit and store electronic information, and to manage or support a variety of our processes, activities and products. We also collect and store sensitive data, including personally identifiable information of our customers and employees.

GM's Privacy Center publishes a [Global Privacy Policy](#) that covers all our operations. We also have a Third-Party Information Security Requirements Exhibit and Privacy Exhibit with additional privacy obligations that are required for all contracts involving personal information (PI), and we update these regularly. Our Board has approved the adoption of Global Privacy Principles, and we continue to be committed to the Alliance for Automotive Innovation's Consumer Privacy Protection Principles.



Privacy Program

Our collaborative privacy practice is designed to ensure that our collection, use and sharing of PI is secure and compliant, and that it reinforces employee and customer trust and confidence.

The GM Privacy Center provides a privacy program framework that focuses on policies, procedures, tools, guidance and training. This framework also includes a Privacy-by-Design program that requires all data-dependent initiatives to receive a privacy-focused consultation throughout their life cycle. The Privacy Center is operated by our legal staff, who, when necessary, leverage additional nonlegal and external resources to help instill best practices across the company.

Our greatest resources in protecting PI are our employees and processes. Privacy compliance is part of GM's annual Corporate Required Training, which emphasizes the importance of employee and customer privacy to our business. In addition, the Privacy Center conducts awareness training on emerging privacy laws and regulations with key areas of our business.

Privacy Practices

Our Information Security program is aligned to the National Institute of Standards and Technology Cyber Security Framework and International Organization for Standardization (ISO) Standards and includes elements to protect the confidentiality, integrity and availability of information. Our robust Information Lifecycle Management (ILM) Policy and record retention schedule applies globally to all GM employees and others (e.g., contract workers, purchased services, etc.) that create or manage GM records.

The ILM Policy requires that we retain only those records needed to meet business, fiscal and legal requirements. We require a Privacy Impact Assessment to be approved by a Privacy Center member before the implementation or change of any new product, service or process involving the use of PI. Additionally, our Information Security and Risk Management has implemented a risk-based framework to apply additional controls to high-risk systems containing PI.

Data exports outside GM must be approved through our cross-functional data export review process, which evaluates the privacy, security and business risks of all proposals.

Incidents

We have a robust process for employees to report incidents of possible wrongdoing, violations of GM's Code of Conduct, IT or other cybersecurity events, PI incidents or other concerns. This includes our toll-free GM Awareline hotline and a system for reviewing and investigating all alleged incidents. An employee who violates our Privacy Policy or Code of Conduct may be subject to discipline, including warnings, suspension with or without pay and/or termination of employment. Our Cyber Intelligence Team also continuously monitors publicly available information for cyber incidents or data spills that may impact us or our suppliers.

Customer Privacy

We disclose our privacy statements on consumer-facing websites such as our corporate, vehicle brand and OnStar sites. We use an opt-in approach for the collection, use and sharing of consumer PI where legally required or appropriate, based on the nature of the data collected and its intended use. We also offer opt-out options where appropriate.

We comply with all privacy regulations, such as General Data Protection Regulation and the California Consumer Privacy Act. We honor data subject requests under these regulations, including requests to access, make corrections to and delete data. We do not allow the use of customer PI for secondary usage if it is not disclosed in the Privacy Statement or otherwise consented to by the customer. In 2022, we did not have any material customer privacy complaints from regulatory bodies or outside parties.



Environmental Management and Compliance

GM is a global company with operations in diverse regions. In the course of our work, we must comply with multiple sets of regulations. To ensure we act in accordance with a wide spectrum of legislation, we develop internal commitments with an aim to match or exceed global best practice.



As a responsible corporate citizen, we provide global guidelines to help reduce the impact of our activities on the environment. GM's Management of Environmental Compliance and Guiding Environmental Commitments are the foundation of our updated [Global Environmental Policy](#). The commitments are a guide for all GM employees worldwide, encouraging environmental awareness in daily conduct and in the planning of future products and programs.

Although GM-owned and -operated facilities have their own operating plans, all function under the common Global Environmental Policy, which provides an effective foundation for environmental stewardship.

We have a robust process to enhance the integration of environmental sustainability practices into daily business decisions and to:

- Comply with applicable environmental laws and regulations globally
- Monitor our performance according to our own Environmental Performance Criteria (EPCs), which are universal corporate performance requirements designed to protect human health and the environment in accordance with the GM Global Environmental Policy
- Conform to key sustainability performance indicators and environmental performance metrics

Each GM manufacturing site has one or more environmental leaders, who are supported by a GM regional environmental leader and a team of subject matter experts in regional central offices. We also have an annual business planning process, known as Business Plan Deployment (BPD), to strengthen the management of environmental performance. This process links our Global Manufacturing salaried employees and their annual compensation to GM sustainability commitments. Performance on BPD metrics and goals is monitored monthly at all GM manufacturing sites. Action plans are developed as needed to keep performance on track.

Environmental Compliance

Our global guidelines play a significant role in our overall environmental compliance, ensuring that local plant policies:

- Are appropriate to each plant's specific environmental impacts
- Reinforce a commitment to comply with applicable laws and regulations
- Include a framework for setting goals and delivering continuous improvement
- Are documented, implemented and communicated to all employees

It is imperative that we comply with all applicable statutory, regulatory and permit programs and other environmental requirements. Compliance issues occasionally arise, and we treat each allegation of noncompliance seriously. In 2022, we received 26 Notices of Violation, 22 of which were in the United States. We paid two penalties over \$10,000.

Environmental Management System (EMS)

All manufacturing facilities that GM owns and operates, and most of our global nonmanufacturing sites, have implemented an EMS. Our EMS combines elements of ISO 14001 and management system elements that are unique to our operations.

From 2019 through 2022, we developed and implemented an aligned, global, third-party certified ISO 14001 enterprise program. This integration ensures we perform our environmental commitments as a normal part of our business activities.

We continue to expand our EMS program, introducing it into our operations where we see a clear benefit. In 2022, we added one manufacturing and 10 nonmanufacturing sites to it.

Environmental Performance

We implement GM EPCs in support of our environmental compliance efforts under our Global Environmental Policy at our global facilities and major technology centers. The EPCs are internal performance requirements for the management of environmental matters at our facilities. In many cases, they supplement applicable legal requirements by setting minimum standards for environmental management and performance practices that may be more stringent than those required by law. This supports our work to achieve a base level of environmental performance, regardless of where a facility is located or whether there are local environmental programs in place or not.

We track environmental compliance and sustainability performance in manufacturing operations by using the Manufacturing Excellence Indexes system. This is an internal GM scoring tool which provides real-time, common data to measure performance, assess risk and drive continuous improvement.

Managing Substances of Concern

We have a two-tier system for evaluating chemicals used in our facilities to reduce the risk of exposure to workers and releases into the environment. We have centralized and site-specific reviews where experts in industrial hygiene and environmental and human health toxicology evaluate new chemicals. In addition, we work with our suppliers to reduce the presence of chemicals that pose a significant health or environmental hazard.

GM has also established policies, procedures and supplier engagement to monitor banned substances and protect the health of our customers. We receive supplier data monthly and cross-reference it with known restricted substances lists to ensure compliance with regulations around the world. Our Vehicle Chemical Regulatory Compliance Team evaluates all materials, components and parts to verify they do not contain substances prohibited or restricted through GM internal standards, approval databases, the Global Automotive Declarable Substance List or the International Material Data System.

Employee Environmental Training

Our employees are key stakeholders in our environmental stewardship and are critical to our environmental performance. In addition to specific facility, country or region training, we provide strategic training and guidance to our environmental professionals to help them keep pace with evolving environmental issues, changing regulations and best practices. Our training addresses a variety of areas specific to the regulatory requirements for air quality, waste management, water quality and other environment-related topics.

Every new employee working in a plant receives orientation training, which includes environmental training. Employees that need specific environmental management skills or knowledge for their role will receive additional training.

Environmental professionals develop training goals through Workday, our human capital management portal and seek personal and professional development through a range of channels. In North America, environmental professionals attend sessions with internal and external speakers. Outside North America, environmental professionals take a Global Environmental Certification and Training Program focused on our Guiding Environmental Commitments and internal EPCs and industry best practices.



Ethics

GM is dedicated to maintaining an ethical performance culture and living up to our core values and behaviors in everything that we do.

Our business is built upon our vision, core values and core behaviors and we believe that the tone for our ethical performance culture starts at the top. Our Code of Conduct—Winning with Integrity—is a guide for how all employees, including the Board and Senior Leadership Team, play their part in fostering our ethical performance culture across GM and protecting our reputation for integrity in the marketplace. Our Chair and CEO and other members of our Senior Leadership Team regularly emphasize to all employees the importance of knowing the Code and striving to do the right thing, even when it is hard. We monitor the presence and practice of our ethical culture by conducting surveys every few years and will conduct the next survey in 2023.



GM received external recognition for our ethics and compliance program and ethical leadership, including:

Recognized

In 2023, for the fourth year in a row, GM was the only original equipment manufacturer automaker recognized as one of the World’s Most Ethical Companies® by Ethisphere



Won

GM won the Coalition for Integrity’s 2022 Corporate Leadership Award



Recognized

In 2022, GM Mexico was recognized again as one of the Most Ethical Corporations in Mexico by AMITAI®



The Board’s Audit Committee has oversight responsibility for our ethics and compliance program, which promotes a culture of high performance and high integrity worldwide. It is supported in its work by the Global Ethics and Compliance Center (GECC).

The GECC supports GM’s efforts to prevent, detect and correct violations of law and corporate policies and helps promote our ethical performance culture. It is led by the assistant general counsel and chief compliance officer, who reports to the executive vice president—legal, policy, cybersecurity, strategic technology initiatives and corporate secretary, and to the Board’s Audit Committee. The chief compliance officer provides regular updates to the Audit Committee and attends annual private sessions without other members of management.

In addition to aligning GM’s ethics and compliance program with the recognized elements of an effective compliance program, the GECC manages GM’s Code of Conduct and other ethics- and compliance-related policies and processes such as training, communications and misconduct reporting.

We regularly conduct independent third-party assessments of our compliance program and completed our most recent review in 2022. We also recently developed a risk assessment protocol that will modernize the GECC’s ability to assess risk using quantitative and qualitative data, and plan to launch our first risk assessment survey using the new protocol in 2023.

The GECC has assumed certain anti-money laundering responsibilities and plans to publish an enhanced Global Anti-Money Laundering Policy. It will also continue to play an active role in supplier and strategic transaction due diligence in the EV supply chain, including by partnering cross-functionally in the development of our ESG-related investigations process.

Compliance Liaisons

Compliance liaisons are GM team members that help business units and regions by supporting local leadership in promoting our ethical performance culture and assisting the GECC in its compliance risk management efforts. In 2022, we continued to expand the program to further localize compliance and to serve as an additional knowledgeable resource for identifying compliance issues.

The GECC has experienced regional compliance officers to ensure our global ethics and compliance program is implemented uniformly with local customizations as needed. We also have functional and geographic compliance advisors that provide legal advice and support on a variety of legal risk areas, including safety and export compliance, antitrust compliance, data privacy and cybersecurity compliance, and records management compliance.



Code of Conduct

GM’s Code of Conduct—Winning with Integrity—reinforces our commitment to maintain a work environment founded on integrity, mutual respect, trust and accountability. It outlines the policies and obligations that guide our conduct. The Code also includes information on the mechanisms available to report safety and other concerns and publicizes various points of contact, including local leadership, Human Resources, labor representatives, the GECC, Legal Staff, GM Audit Services and our Awareline.

Available in nine languages, the Code applies across our entire company, including to subsidiaries we control. In 2022, we refreshed it with our “Be Inclusive” behavior, a new CEO leadership message and other relevant content. We also expect third parties, including suppliers, to act in a manner that is consistent with the principles and values outlined in our Code when conducting business with, and on behalf of, GM.

Conflicts of Interest

We maintain a robust conflict of interest disclosure process that applies to all salaried employees and members of the Board. Employees are required to complete an electronic conflict of interest questionnaire at least once during their employment and keep it updated as their personal circumstances change. Board members who are not employees provide written disclosure of any actual or potential conflicts of interest at least annually.



Reporting Concerns

We encourage our employees to speak up and provide resources to do so. Our internal “Report Concerns” site helps employees quickly identify the most effective way to report their concern.

The GM Awareline—operated by an independent third party—allows employees and others to anonymously (where permitted by law) report concerns in over a dozen languages at any time by phone, web or email. In 2022, GM received 5,715 reports to the Awareline; 4,039 were classified as allegations, with the remaining classified as suggestions, inquiries and other issues.

We track all reports of misconduct, whether through Awareline or another channel, in a case management system that allows us to preserve a reporter’s anonymity while facilitating efficient investigation, follow-up and compliance trend analysis.

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. We give high-priority cases special scrutiny and review, and a cross-functional committee meets monthly to discuss their progress and resolution. Processes are in place to determine which cases require reporting to the Board or Audit Committee.

Speak Up!, GM’s Non-Retaliation Policy, protects GM employees from retaliation when they raise a concern in good faith. Since the majority of misconduct reports are made to an employee’s manager, we have developed a website with a range of helpful compliance tools for managers. We also offer a scenario-based course for managers.

The GECC developed and launched a post-investigation anti-retaliation survey in 2021. Its purpose is to initiate outreach to known reporters following an investigation, to identify and respond to potential retaliation and improve the investigative process. The survey was successfully piloted in the United States through 2022 and we plan to expand it globally in 2023.

2022 Allegations Received

Category	Proportion of total
Accounting, Auditing and Financial Reporting Examples: Fraud relating to accounting procedures, internal controls or auditing matters	<0.1%
Business Integrity Examples: Fraud, conflicts of interest, corruption	5%
Human Resources, Diversity and Workplace Respect Examples: Interpersonal conflicts, harassment, discrimination, retaliation	68%
Environment, Health and Safety Examples: Threats and violence, substance abuse, environmental concerns, workplace safety	13%
Misuse, Misappropriation of Corporate Assets Examples: Theft, property damage, information or IP loss, computer misuse	14%



Ethics Training and Education

To reinforce our ethical culture, we educate employees about how to apply our standards and principles at work. The GECC uses insights from external ethics and compliance thought leaders and internal subject matter experts to develop multi-year training, education and policy certification plans, which are reviewed by a cross-functional training governance board.

To ensure the effectiveness of our training, we regularly conduct third-party assessments of our training program against Department of Justice and benchmarking resources, such as Ethisphere’s World’s Most Ethical Companies® Evaluation Framework.

We require all eligible salaried employees to complete Corporate Required Training courses annually. This is available in seven languages and we deploy new or refreshed content every year. In 2022, we achieved a 100% completion rate across our salaried employees for the required courses, which were:

- GM Code of Conduct: Winning with Integrity
- Cybersecurity
- Product and Workplace Safety
- Anti-Corruption Compliance

In addition to Corporate Required Training, we require our salaried employees to annually complete Code of Conduct training, certify their agreement to it, and declare that they have disclosed any new potential conflicts of interest and reported any suspected Code violations or safety issues. Board members receive in-person Code of Conduct training delivered by the chief compliance officer.

2022 Ethics & Compliance Training

~360,000

online courses delivered



~23,000

in-person advanced compliance training modules delivered

~70,000

employees and select contractor workers who completed ethics and compliance training



One

customized contract worker course

Four

required courses for employees



Beyond Corporate Required Training and Code of Conduct training, we use risk-based principles to provide live and remote training to thousands of employees each year on topics such as export compliance, antitrust, Foreign Corrupt Practices Act, privacy, working with third parties, winning in the marketplace without sacrificing our values, the Speak Up! policy and other relevant compliance topics. We also use on-demand microlearning modules so that employees can access refresher training on gifts and entertainment and conflicts of interest processes as needed. In 2022, we launched a People Leader Ethics Toolkit that contains guidance on how to apply GM’s ethics and values.

Winning With Integrity at the Speed of Business

2022’s Compliance and Ethics Week, held in May, connected Winning with Integrity with our need to rapidly embrace and realize our EV and AV future. During Compliance and Ethics Week we engaged employees through leadership messages and interviews, a pulse survey, compliance toolkits, Speak Up! video and infographic and other measures to promote our Winning with Integrity behavior.



(Above) Preproduction model shown. Actual production model will vary. Model Year 2024 Silverado EV available Fall 2023.



Public Policy

Our global commitment to advancing an all-electric, zero-emissions future is unwavering. GM has consistently and publicly advocated for policies that support the adoption of EVs and help to address climate change.

We continue to work closely with governments worldwide to implement complementary policies and nonmonetary incentives, and build out infrastructure, low-carbon electricity and the overall manufacturing footprint necessary to the success of our all-electric vision and carbon neutral goals.

To reach our goals, GM's Global Public Policy (GPP) organization leverages the expertise of the GM team, industry subject matter experts, coalitions and industry trade associations. We carefully consider public policy challenges and opportunities and develop informed policy positions to effectively advocate for legislative and regulatory action that will support decarbonizing on-road transportation and the grid.

In September 2022, GM and the Environmental Defense Fund (EDF) [announced a set of principles](#) that seek to accelerate a zero-emissions, all-electric future for passenger vehicles in the United States. The recommendations were developed to support the critical next generation of national tailpipe emission standards, scheduled to begin in 2027. We encourage the Environmental Protection Agency (EPA) to establish standards aimed at ensuring that at least 50% of new vehicles sold by 2030 are EVs, so that the nation can achieve a 60% reduction in GHG emissions from new vehicles in Model Year 2030, compared to 2021.

We strongly support policies that will allow the EV transition to accelerate so the United States can be globally competitive. New technologies take time to scale and reduce costs. EVs are no different, but we are determined to ensure that the U.S. auto industry leads the way.

In August 2022, GM was the first automaker to publicly support the Inflation Reduction Act (IRA). The IRA incentivizes domestic production and sourcing of EVs and their components. We also engaged with trade associations on the economic advantages and climate benefits provided by the clean energy provisions, particularly the on-shoring and ally-shoring of the EV supply chain. For more examples of our work to advance our climate policy agenda, see our [2022 Sustainability Advocacy Report](#).

Advocating for Technologies to Improve Mobility

GM envisions a future where we can all enjoy the freedom and convenience of vehicle use while also striving for a world with zero congestion. A combination of autonomous vehicle (AV) technology, new mobility solutions and supportive public policy will enable reductions in congestion as we continue to push toward a future of zero crashes, zero emissions and zero congestion.

We are engaging in policy discussions and relentlessly working on technologies that will make this future possible. We have a strong track record of collaboration with the public sector and community partners, such as the deployment of sustainable last-mile solutions and community-based EV ride-hailing programs. We will continue building on this foundation through engagement with a diverse array of stakeholders, crafting meaningful pilots and using our knowledge and experience to drive innovative policymaking.

As we explore future markets for our AV and fleet offerings, we work closely with communities to find solutions together. Gains in efficiency and safety create opportunities for more community access to employment, education and health care.

We are also optimistic that innovations in vehicle connectivity will help optimize traffic flows and reduce traffic crashes, ultimately easing congestion. To help achieve these objectives, we are focused on deploying advanced driver assistance technologies such as Super Cruise and Ultra Cruise, and self-driving technology through applications such as the Cruise Origin.

We have many examples that demonstrate the immediate benefits the deployment of our products can present, including our technologies in last-mile urban delivery solutions such as [BrightDrop](#).

Corporate Political Contributions and Lobbying Expenditures

We believe we should have a role in shaping public policy and addressing legislation that impacts our company, industry and stakeholders. We have and will continue to support public policies that drive our long-term, sustainable growth. Recent enhanced disclosures led the Center for Political Accountability to award GM "Trendsetter" status in their annual [CPA-Zicklin Index of Corporate Political Disclosure and Accountability](#).

Our Board receives regular reports on the most pressing public policy issues and actively oversees our participation in the political process, for example by:

- Adopting a [U.S. Corporate Political Contributions and Expenditures Policy](#), overseen by the Governance and Corporate Responsibility Committee (GCRC).
- Through the GCRC, annually reviewing the Sustainability Advocacy Report, as well as all corporate political contributions, GM Political Action Committee contributions (which are funded entirely by voluntary employee contributions) and the process by which contributions are made. The committee also receives regular updates each year regarding the company's direct and indirect lobbying activities and expenditures.

Learn more in our [2022 Sustainability Advocacy Report](#).