

Policy #: <b>GECC-03</b>	Policy Name: <b>Speak Up! GM's Non-Retaliation Policy</b>	
Effective Date: June 30, 2014	Executive in Charge: Executive Vice President and General Counsel	Policy Contact: Chief Compliance Officer

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## I. Purpose

General Motors is committed to maintaining a culture of unwavering commitment to and focus on product and workplace safety and that promotes the prevention, detection and resolution of misconduct as defined below ("Misconduct"). It is important that we all do our part to bring ideas forward and recognize and report both safety issues and Misconduct in the workplace

This policy reinforces the importance of delivering the highest levels of safety, quality and customer service in any industry and to cultivate a culture of unwavering commitment to and focus on product and workplace safety. It also reiterates the importance of reporting product and workplace safety concerns and instances of Misconduct and reinforces GM's intolerance for retaliation against an employee who raises a concern in good faith.

## II. Applicability

Consistent with GM's Speak Up for Safety and Awareline procedures, anyone in any part of the world can report potential vehicle or workplace safety issues or potential Misconduct by GM, its management, supervisors, employees or agents. This policy is intended to protect GM employees from retaliation as a result of raising such concerns in good faith. This policy applies to all of GM's operations globally, and any subsidiary in which GM directly or indirectly owns more than 50% of the equity, or which GM otherwise controls.

## III. Definitions

Misconduct – includes, but is not limited to, conduct that does not conform to law, regulation, policies and procedures or Winning with Integrity, GM's Code of Conduct. Examples of Misconduct may include fraud, theft, workplace violence, discrimination, harassment, misuse of company resources, conflicts of interest, information breaches, improper accounting controls or purchasing arrangements, and other unethical behaviors. Misconduct can also include not following safety rules and thereby exposing yourself or others to risk of injury.

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Retaliation - any adverse action taken against an employee for their reporting a concern in good faith. Adverse actions can include threats, intimidation, harassment, discrimination, limiting career opportunities, or termination. Other examples can include negative performance feedback independent of actual performance deficiencies, reassignment, or other apparent adverse treatment related to the reporting.

## IV. Policy

### A. How to Report

Each employee has an obligation to report safety concerns and Misconduct. GM is committed to open, internal communication that supports ethical behavior and compliance with the law and GM policies. Employees are encouraged to report concerns first to their supervisor, HR contact, Legal Staff contact, or local leadership. 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. You may report your concern anonymously, but are encouraged to identify yourself to allow for more robust follow up and recognition.

Employees are encouraged to self-report mistakes or misconduct, including their own. Please note, however, that the intent of this policy is not to protect employees for their own actions or Misconduct.

### B. Non-retaliation

Employees often are the first to become aware of safety issues or instances of Misconduct in the workplace. These concerns can most effectively be addressed and corrected when employees fulfill their responsibility to report it promptly. To enable employees to do so with confidence, GM will not tolerate any adverse action taken against an employee attributable to their reporting a concern in good faith. This protection, likewise, applies to employees reporting actual or potential safety-related defects, or potential non-compliance with the U.S. Federal Motor Vehicle Safety Standards (or equivalent laws and regulations outside the U.S.)

If an employee believes that he or she has been retaliated against or witnesses retaliation against another in violation of this policy, he or she should immediately report such concerns. Such report can be made to his or her supervisor, HR contact, Legal Staff contact, local leadership, the [Global Ethics & Compliance Center](#), or the [Awareline](#), whichever channel the employee feels most comfortable reporting through given the circumstances. Once an employee reports alleged Retaliation, GM will investigate that allegation. If it is determined that Retaliation has occurred, corrective action will be taken. Depending upon the nature of the Retaliation, those who violate this policy will be subject to disciplinary action up to and including termination. In addition, anyone who interferes with an investigation, or provides information in an investigation that the individual knows to be untrue or inaccurate, will be subject to disciplinary action.

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## V. Related Regional/Country Policies

Due to the legal requirements in Europe, notably the laws related to the protection of personal data, the GM policies governing the GM Speak Up for Safety and Awareline programs in Europe differ from that of other countries. See the Europe program web pages for additional information on the scope and reporting methods.

If you have additional questions on the Speak Up for Safety program for Europe or would like more information please contact the [Global Ethics & Compliance Center](#) or send an email to the [Regional Compliance Officer for Europe](#).

If you have additional questions on the Awareline program for Europe or would like more information please contact [Global Security](#) or send an email to [gme.awareline@gm.com](mailto:gme.awareline@gm.com).