

# GENERAL MOTORS



GM'S CODE OF CONDUCT  
WINNING WITH INTEGRITY





# A MESSAGE FROM OUR CHAIRMAN AND CHIEF EXECUTIVE OFFICER

GM Team Members:

Our Code of Conduct, *Winning with Integrity*, sets forth our fundamental commitment to conducting business ethically and honestly. We are committed to our core values: customers, relationships, and excellence. We must always act with integrity, take accountability for results, and do the right thing, even when the right thing is hard to do. Quality and safety – both customer and workplace – are foundational commitments, never compromised.

This year, we are introducing a revised and redesigned version of our Code. It's a user-friendly statement of our shared values and features examples and interactive links to supporting materials.

Taking personal responsibility for our actions is critical to our success, and the senior leadership team and I urge you to take the time to understand and then live the Code. It is important to know the policies and guidelines you are required to follow and use them as a guide when making decisions that affect the company.

We are absolutely committed to winning with integrity. We are entering our second year of our Deferred Prosecution Agreement arising out of the ignition switch matter and are cooperating fully with the independent Monitor. If you witness misconduct in any form, speak up. We offer various ways to let your voice be heard, including the Awareline, Speak Up for Safety, the independent Monitor hotline and our own open door policy. Please know at GM we do not tolerate retaliation for making a good faith report.

I look forward to working with you to make our company the best it can be.

**mtb**

Chairman and Chief Executive Officer  
General Motors







# SPEAK UP FOR SAFETY

## SAFETY. IT'S PERSONAL. OWN IT.

Everything we do is guided by one unwavering objective: to do what's best for our customers. Appreciating them and working each day to earn their loyalty is what drives us to make better and safer cars, trucks, and crossovers.

Safety and quality form the foundation on which our business is built. Our customers rely on our vehicles and technologies to safely and reliably transport them and their families on life's journeys.

As part of our commitment to put customers at the center of everything we do, we also make workplace safety a foundational commitment – never compromised. At GM, safety is owned by every person at every site globally, including employees, visitors, contractors, and our third parties.

We live values that return people home safely. Every person. Every site. Every day. That includes using our local reporting processes, like the Employee Safety Concern Process at manufacturing sites when there is a workplace safety concern, or Speak Up for Safety, if you have a vehicle safety concern or if you don't believe a workplace safety issue is being addressed by existing local reporting processes. We encourage you to Speak Up for Safety, whether it's an issue of concern at work or on the road. You can do so confidently because we do not tolerate retaliation against persons who voice a concern in good faith.

Together we build a better GM by living our values and owning the safety of our customers and coworkers every day, in every decision.







# OUR PURPOSE AND VALUES

## WHO WE ARE AND WHY WE ARE HERE

**We earn customers for life.**

**Our brands inspire passion and loyalty.**

**We translate breakthrough technologies into vehicles and experiences that people love.**

**We serve and improve the communities in which we live and work around the world.**

**We are building the most valued automotive company.**

## OUR CORE VALUES

### CUSTOMERS

We put the customer at the center of everything we do. We listen intently to our customers' needs. Each interaction matters. Safety and quality are foundational commitments, never compromised.

### RELATIONSHIPS

Our success depends on our relationships inside and outside the company. We encourage diverse thinking and collaboration from the world to create great customer experiences.

### EXCELLENCE

We act with integrity. We are driven by ingenuity and innovation. We have the courage to do and say what's difficult. Each of us takes accountability for results and has the tenacity to win.







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# WE FOLLOW OUR CODE

Why? Because our mission is to become the world's most valued automotive company. We strive to do business the right way and win with integrity. Our Code is an important expression of our values and helps us make decisions that win our customers' loyalty, trust, and respect.





## ABOUT OUR CODE

Taking personal responsibility for our actions is critical to the success of our company. People trust us to deliver on our promise to do business ethically and design, build, and sell safe, high-quality vehicles. Our employees and visitors to our facilities expect us to operate in a safe environment that allows them to return home safely. We live our values and do what's right for each other, our customers, and the communities where we work around the globe.

### WHAT IS OUR CODE?

GM's Code of Conduct is a statement of our shared values that helps us operate openly, honestly, and ethically. Our Code is the cornerstone of our compliance program and guides us to win in business with integrity. Though it doesn't offer an answer for every situation, it provides the resources you need to make ethical decisions. Refer to it often in your work, use good judgment, and always seek guidance if you need additional assistance.

### WHO DOES IT APPLY TO?

Our Code applies to everyone in our company, at every level, including employees, supervisors, board members, and subsidiaries GM controls. We expect our third parties, including suppliers, to act in a way that is consistent with the principles and values of our Code when conducting business with GM. We expect employees working with our third parties to hold them accountable.

As a global company, there may be limited circumstances where local law or other legal requirements differ from the standards set forth in our Code. We comply with applicable local laws and our Code. If you become aware of a conflict between our Code and other legal requirements, please contact Legal Staff.

### A third party is anyone who does business with GM, including:

- Suppliers
- Consultants
- Agents
- Sales representatives
- Dealers
- Independent contractors
- Contract workers
- Customers

### WHAT DOES IT MEAN TO BE ACCOUNTABLE?

We're each personally responsible for operating with high performance and high integrity. We own accountability at a personal level. This means:

- Doing what we say we will do.
- Demonstrating accountability by supporting each other's work by being transparent, honest, and direct.
- Demonstrating performance-based behavior by proactively seeking to resolve problems.
- Demonstrating accountability by aligning performance-based behavior around GM's priorities.

## WHAT DOES IT MEAN TO BE ACCOUNTABLE? CONTINUED

Employees who violate the law, our Code, or our policies may be subject to disciplinary action, up to and including termination. Know that certain violations may have additional consequences, such as fines, criminal prosecution, and jail time. We expect everyone to do their part to protect our reputation, our company, and our customers.

## OUR RESPONSIBILITIES

As members of the GM team, we count on each other to build on our tradition of excellence and live the values that drive our company.

### Do your part:



**Review our Code.** Consult our Code often in your work. Use it to help make ethical decisions. If you need more information about a specific policy, review our detailed policies on the [Policy Link](#) page and throughout the Code.



**Act ethically.** Always use good judgment and comply with the law, our Code, and our policies. Honor our commitment to high integrity in everything you do. Listen and respond to the concerns of customers, coworkers, dealers, and suppliers.



**Share questions, concerns, and ideas.** Whenever you have questions or need advice, contact your supervisor or seek guidance from another internal resource. Take action and report suspected violations of the law, our Code, and our policies. Provide feedback on problem areas and suggest ways we can improve.



**Cooperate fully.** Ensure misconduct allegations are referred to the appropriate source and respond promptly to any requests you receive as part of a misconduct investigation by providing complete and accurate information.



**Understand the rules.** Laws are complex and can change. Know the rules that apply to your work so you can address issues that arise and recognize when to get advice. If you ever need assistance with a legal issue that may affect your job, contact Legal Staff.

## SUPERVISORS' RESPONSIBILITIES

As a supervisor, you have a special obligation to demonstrate high performance with high integrity. It's not enough for you to act with integrity yourself; you have a responsibility to inspire others to follow your lead.

### We expect you to:



**Be a role model.** Set a good example for your team and demonstrate our values through your words and actions.



**Build an ethical culture.** Encourage employees to review our Code and help them understand their responsibilities.



**Listen and offer guidance.** Be available and listen when employees come to you with questions or concerns. Discuss issues with them and assist them in making ethical decisions.



**Speak up.** If you suspect behavior that is unethical or violates the law, our Code, or our policies, **report it** immediately.



**Don't permit retaliation.** Take action to prevent retaliation against any employee who reports a safety concern or violation of the law, our Code, or our policies in good faith.



**Get advice.** If you learn of or encounter a situation where you're unsure of the proper course of action, **seek guidance**.



## WHICH WAY?

**Q** – I told my employees we must make our numbers this quarter. I made sure to let them know I don't care how they do it, as long as they meet our target. After all, when we hit our numbers, we all win. Did I send the right message?

**A** – No. Though encouraging your team to reach a company goal is important, and working together builds a sense of unity, we need to do so with integrity. You should send the message that we achieve our numbers the right way, by living our values and following the law, our Code, and our policies.



## MAKING GOOD DECISIONS

Sometimes we face difficult situations where the right choice isn't clear. That's when our commitment to winning with integrity matters most.

### Decision-Making Model

When you face an ethical dilemma, ask yourself:



**Yes** If you answered “yes” to all of these questions, then the decision to move forward is probably okay.

**Not Sure** Ask your supervisor or another internal resource for guidance.

**No** Stop. Don't do it. The action could have serious consequences. Seek help.

**Stay alert to warning signs.** If you hear comments like these, take a step back and reevaluate the situation:

**“Don't worry about it. Who's going to know?”**

**“Our competition does it, so it must be okay.”**

**“We need to do whatever it takes.”**

**“That's how they do business here.”**

**“We've always done it this way and no one has been disciplined.”**







## SPEAK UP! – SHARING CONCERNS

An essential part of operating with high performance and high integrity is taking action when you believe the law, our Code, or our policies may have been violated or are about to be violated. When you suspect **misconduct**, it's important that you speak up about it.

## HOW TO MAKE A REPORT

There are many ways to speak up:

**Let your supervisor know.** Share your concern with your supervisor first, if possible. Often he or she will be able to offer guidance and answer any questions.

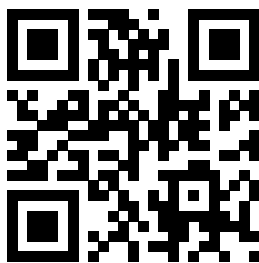
**Report it to another internal resource.**

If you're not comfortable discussing the situation with your supervisor, you can go to another supervisor or any of the following resources:

- HR
- The [Global Ethics and Compliance Center](#)
- Legal Staff
- Local leadership

**Contact the Awareline.**

The Awareline is another resource through which we can all raise concerns. It's operated by an independent third party and is available 24/7, from any location around the globe.



**Online (outside of Europe):**

<https://gmweb.gm.com/HR/Security/Pages/Awareline.aspx>

**Online (within Europe):**

<https://gmweb.gm.com/HR/Security/CountryRegion/Pages/EuroAware.aspx>

**Phone:** [Click here](#) for country-specific phone numbers.

You may report your concern anonymously, where permitted by law. We will exercise discretion to avoid disclosing the sources of information we receive and try to keep information confidential. Any concern raised will be taken seriously, investigated, and responded to appropriately.

**Speak Up for Safety.** Safety concerns or suggestions about how to improve the safety of our vehicles or workplace can be shared through our Speak Up for Safety program.

**Online (outside of Europe):**

<http://communicator.gm.com/sites/speakupforsafety/>

**Online (within Europe):**

[www.eu.speakupforsafety.gm.com](http://www.eu.speakupforsafety.gm.com)

[Download the Mobile App](#)

**Fax:** (888) 597-6152

**Email:** [HotlineServices@usa.g4s.com](mailto:HotlineServices@usa.g4s.com)

For additional information about Speak Up for Safety, please refer to the [Safety](#) section.

**Employee Safety Concern Process –**

The Employee Safety Concern Process exists at every manufacturing site globally. Employees and others at manufacturing sites are encouraged to first report workplace safety concerns through the Employee Safety Concern Process. We may also raise safety concerns, at any time, using Speak Up for Safety.

**Share it with GM's Monitor.** GM has an independent Monitor appointed under the Deferred Prosecution Agreement entered into as part of the U.S. Department of Justice ignition switch investigation. If you're aware of any unethical or illegal conduct that has not been reported to the proper U.S. federal, state, or municipal agency, you have an obligation to report it to our Monitor or the [Global Ethics and Compliance Center](#).

**Independent Monitor Hotline:**

<https://socrates.gm.com/programs/monitor/global/en/gm/index.html>

Because of legal requirements in Europe, the policies governing the Speak Up for Safety and Awareline programs in Europe are different from other countries. Employees in Europe should visit the European program webpages for more information about how and when to make a report.

## AFTER A REPORT IS RECEIVED

Reports of suspected misconduct will be appropriately investigated and treated confidentially to the extent possible in light of GM's need to conduct an investigation and follow up on any concerns. You should not conduct your own investigation. Investigations often involve complex legal issues, and acting on your own may compromise an investigation and negatively affect both you and the company.

## WE NEVER TOLERATE RETALIATION

We are committed to maintaining a culture where employees feel comfortable raising concerns, which is why we never tolerate retaliation against anyone for raising a concern in good faith. If you feel you have been retaliated against or suspect retaliation against someone else, report it through one of the internal channels referenced in this section. We will investigate the matter and take corrective action. Anyone found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

And, though we prefer that employees raise concerns internally, we comply with laws that prohibit retaliation, for example, for raising concerns or complaints to government officials or through courts.



**NAVIGATE OUR POLICIES**  
[GM Speak Up Policy \(Non-Retaliation\)](#)





# WE CARE ABOUT OTHERS, WE PUT SAFETY FIRST

People drive our business, which is why we're dedicated to putting safety first and to treating everyone inside and outside our company with dignity and respect.





## SAFETY

We all want a safe and healthy workplace, just like our customers want safe, high-quality vehicles. We consider safety to be the driving force behind everything we do as a company. Quality and safety are foundational commitments, never compromised.

### VEHICLE SAFETY

Everyone at GM has a personal responsibility for vehicle safety. We are each expected to maintain the highest standards and to put the safety of our customers first – without exception.

As a company, we strive to always produce the safest vehicles for our customers and understand that to do so, we must maintain an active dialogue about safety. Do your part by identifying, reporting, and escalating safety issues that you learn of or suspect so that we can strengthen our approach to vehicle safety.

### SAFETY IN OUR WORKPLACE

We want to provide a safe work environment for everyone at GM, including employees, contractors, and visitors. We take our commitment to ensuring a safe and healthy workplace seriously and believe it's everyone's responsibility.

### WE KEEP OUR WORKPLACE SAFE BY:



**Acting** with high performance and high integrity.



**Knowing** how to recognize potential workplace risks and reporting any safety concerns.



**Following** the law, safety procedures, our Code, and our policies.



**Ensuring** that everybody on our team is properly trained to perform their job.



**Offering** feedback to colleagues if they are not working safely and accepting feedback when offered.



**Reporting** safety concerns.



**Being** proactive and finding ways to make our workplace safer.

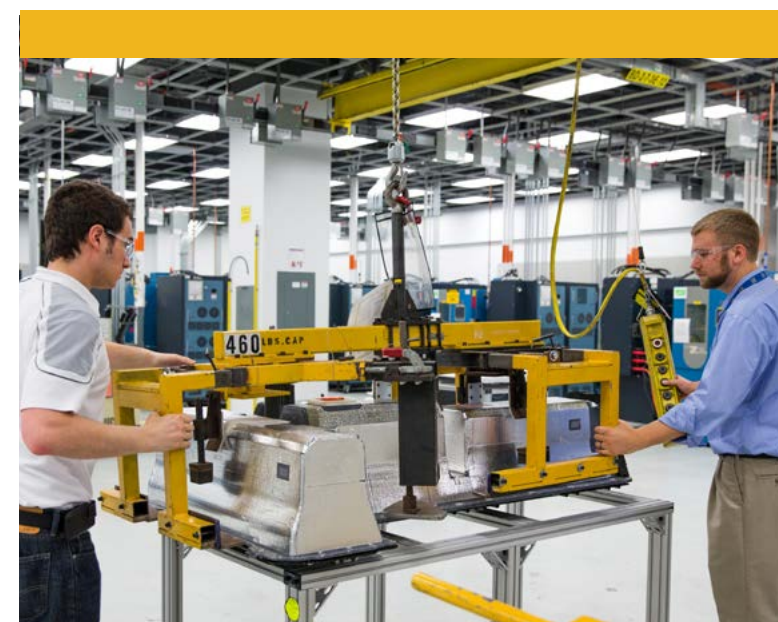


**Valuing** the safety of our coworkers and customers as we would our own families.



**Serving** as a constructive example for others to follow.

We encourage you to continue to live our values outside of work.





## SPEAK UP FOR SAFETY

We recognize that maintaining a culture where everyone at GM feels comfortable sharing their ideas and concerns is essential to ensure that we put the safest cars on the road for our customers and provide a safe working environment for our employees. When you have a vehicle or workplace safety concern, speak up about it – either openly or confidentially.

**Speak Up for Safety** offers one option for hourly and salaried employees, contract workers, and suppliers working on behalf of GM to report vehicle or workplace safety concerns and make suggestions to improve safety.



## HOW CAN I SPEAK UP FOR SAFETY?

You can share safety concerns or suggestions anytime by reporting them through any of the following avenues:



**Online (outside of Europe):**  
<http://communicator.gm.com/sites/speakupforsafety/>

**Online (within Europe):**  
[www.eu.speakupforsafety.gm.com](http://www.eu.speakupforsafety.gm.com)



**Phone:**  
[Click here](#) for country-specific phone numbers.



**Download the Mobile App**



**Fax:**  
 (888) 597-6152



**Email:**  
[HotlineServices@usa.g4s.com](mailto:HotlineServices@usa.g4s.com)



**Mail:**  
 Speak Up for Safety  
 P.O. Box 33233  
 Palm Beach Gardens, FL 33410

While you may make a report anonymously where permitted by law, you're encouraged to identify yourself to allow for follow-up or recognition, if appropriate. Once a concern is raised, the Global Vehicle Safety and/or Global Safety and Industrial Hygiene teams will review the issue and take appropriate action.

Employees and others working at manufacturing sites are encouraged to first report workplace safety issues using the Employee Safety Concern Process or other existing local reporting processes. We may also report safety concerns, at any time, using Speak Up for Safety.

Remember that we never tolerate retaliation against anyone who raises a safety or other misconduct concern in good faith. If you suspect that you or someone else is experiencing retaliation for raising an issue, [report it](#).

## DRUGS AND ALCOHOL

Working under the influence of drugs or alcohol can create a safety hazard and affect your judgment. That's why we prohibit employees from working under the influence of these substances. Medication prescribed to you by a doctor can also affect your ability to do your job safely. Check with your doctor about any impact your prescription might have on your ability to perform your job safely, and communicate any concerns to your supervisor.



## WHICH WAY?

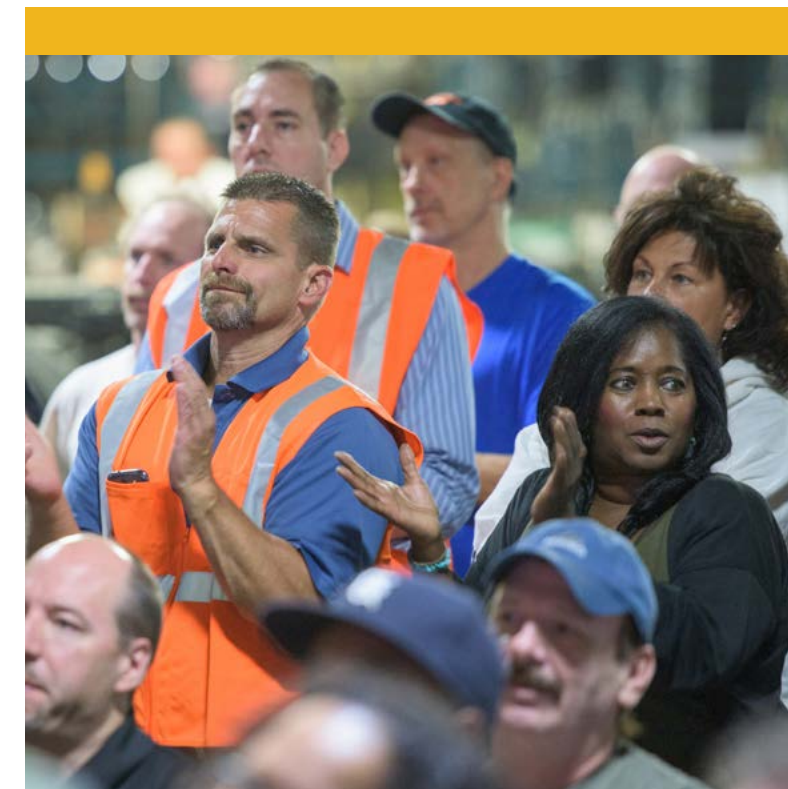
**Q** – I noticed a potential safety hazard, but it's relatively minor. Because we have to meet a deadline for an important project and reporting the hazard would cause a delay, is it okay if I wait until after we finish the project to make a report?

**A** – No. Safety issues should always be reported right away, even if doing so can delay a project.

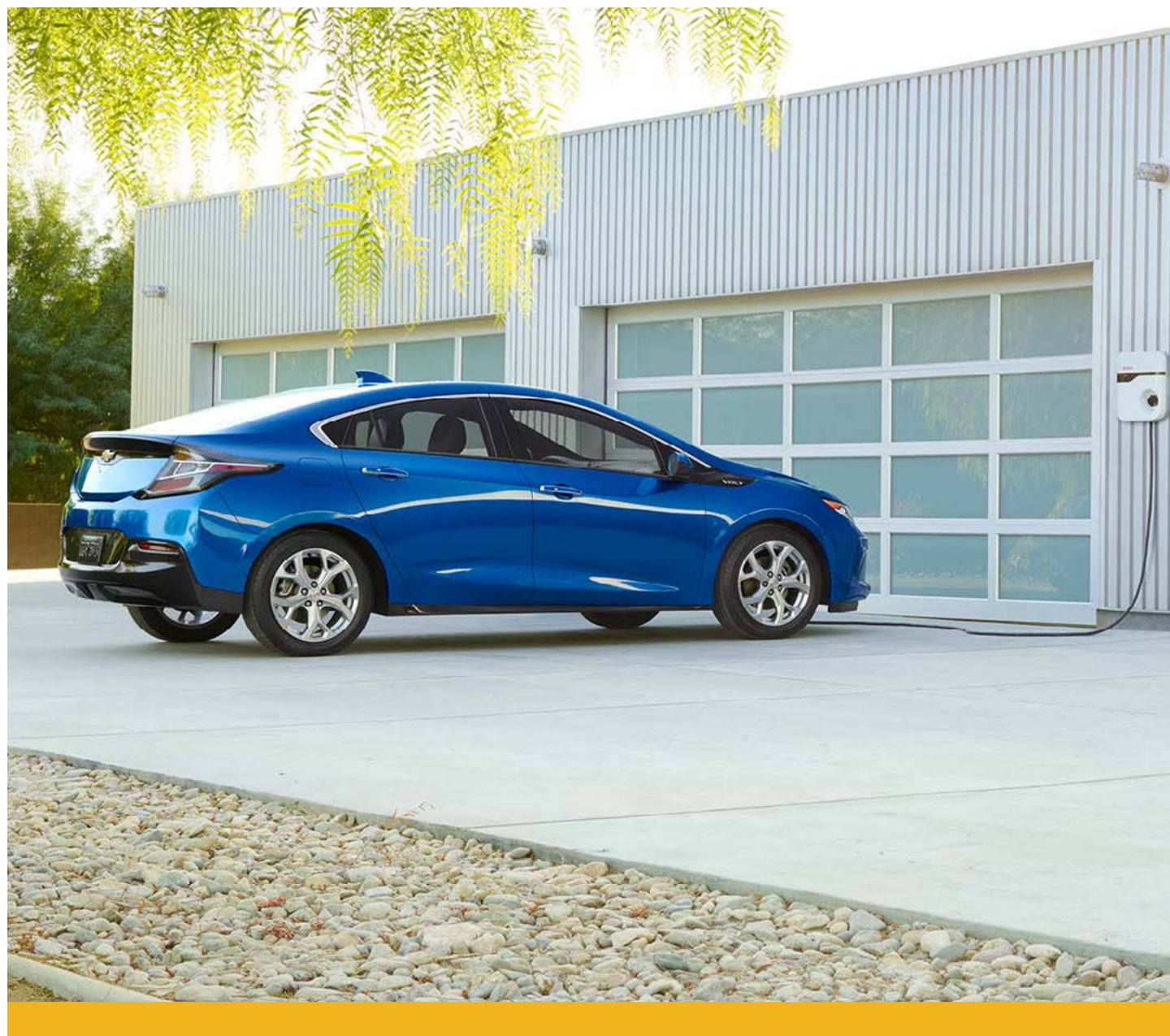


## NAVIGATE OUR POLICIES

**GM Speak Up Policy**  
**(Non-Retaliation)**







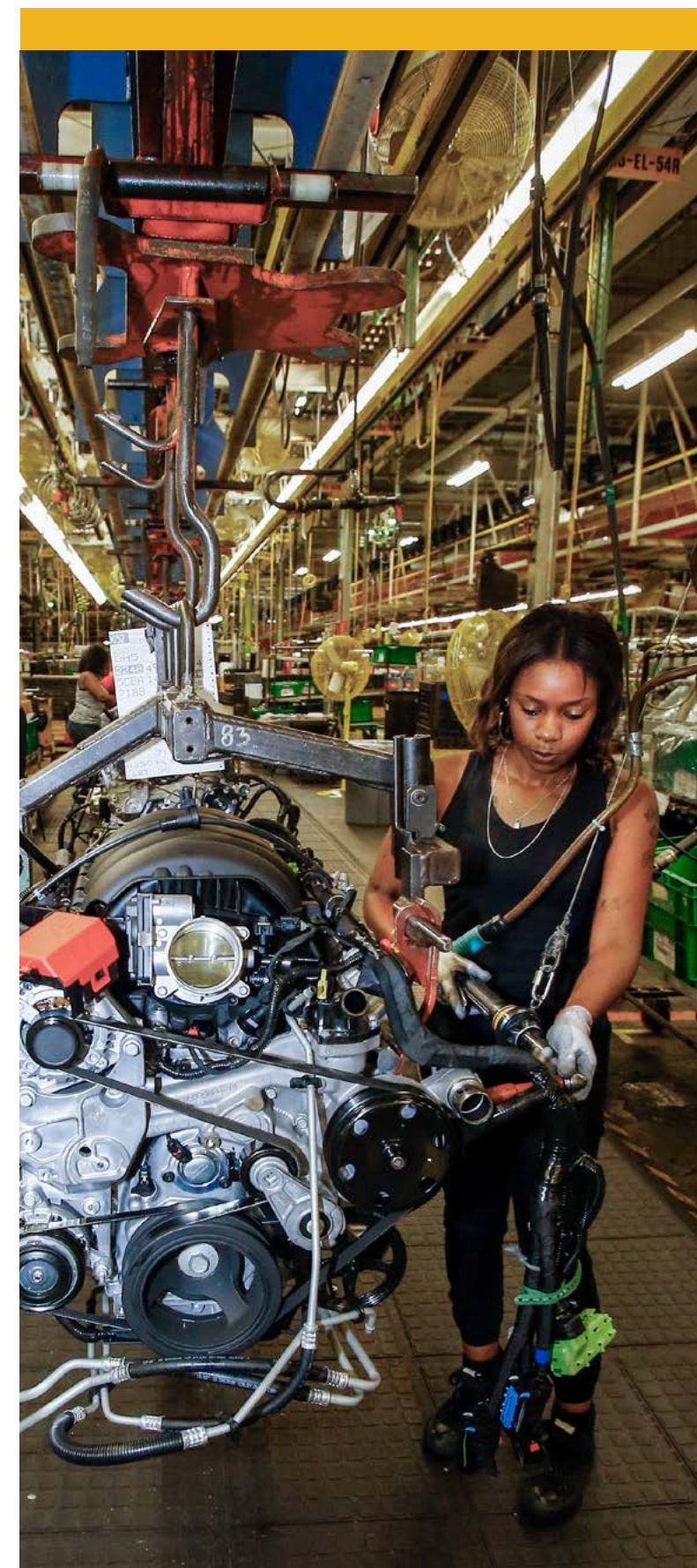
## NEW TECHNOLOGIES AND MOBILITY SOLUTIONS

Across the industry and around the world, social and technological changes are transforming personal mobility. We are committed to developing cleaner, safer, smarter, and more environmentally friendly vehicles and technology solutions for our customers.

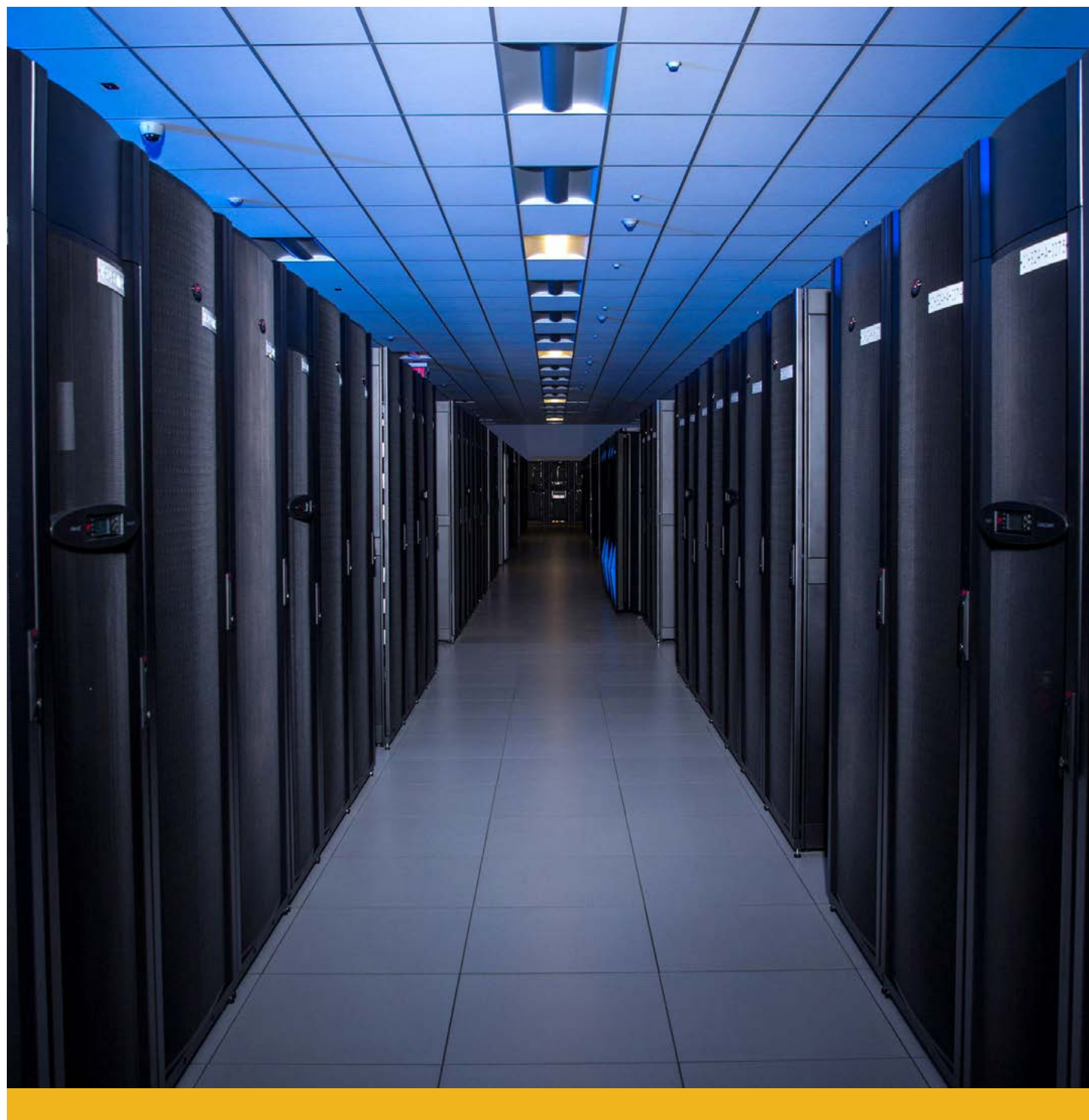
### BEHAVIORS

With so many changes transforming the global automotive industry, from urban mobility and ride sharing, to connectivity, autonomous vehicles, electrification, and other advanced propulsion technologies, it's important that we maintain a consistent understanding within GM of who we are and why we are here.

- We put customers at the center of everything we do.
- We never compromise on quality and safety.
- We comply with applicable privacy laws and integrate our [Privacy Principles](#) into business activities.
- We understand the importance of cybersecurity in protecting customers, their data, and our company and incorporate security by design throughout all phases of product and service development.
- We drive excellence, safety, and integrity into everything we do as we realize the full promise of autonomous vehicles.







## CYBERSECURITY

It is important that our products are safe for our customers, protect their data, and are designed with security in mind.

### MAINTAINING INFORMATION SECURITY

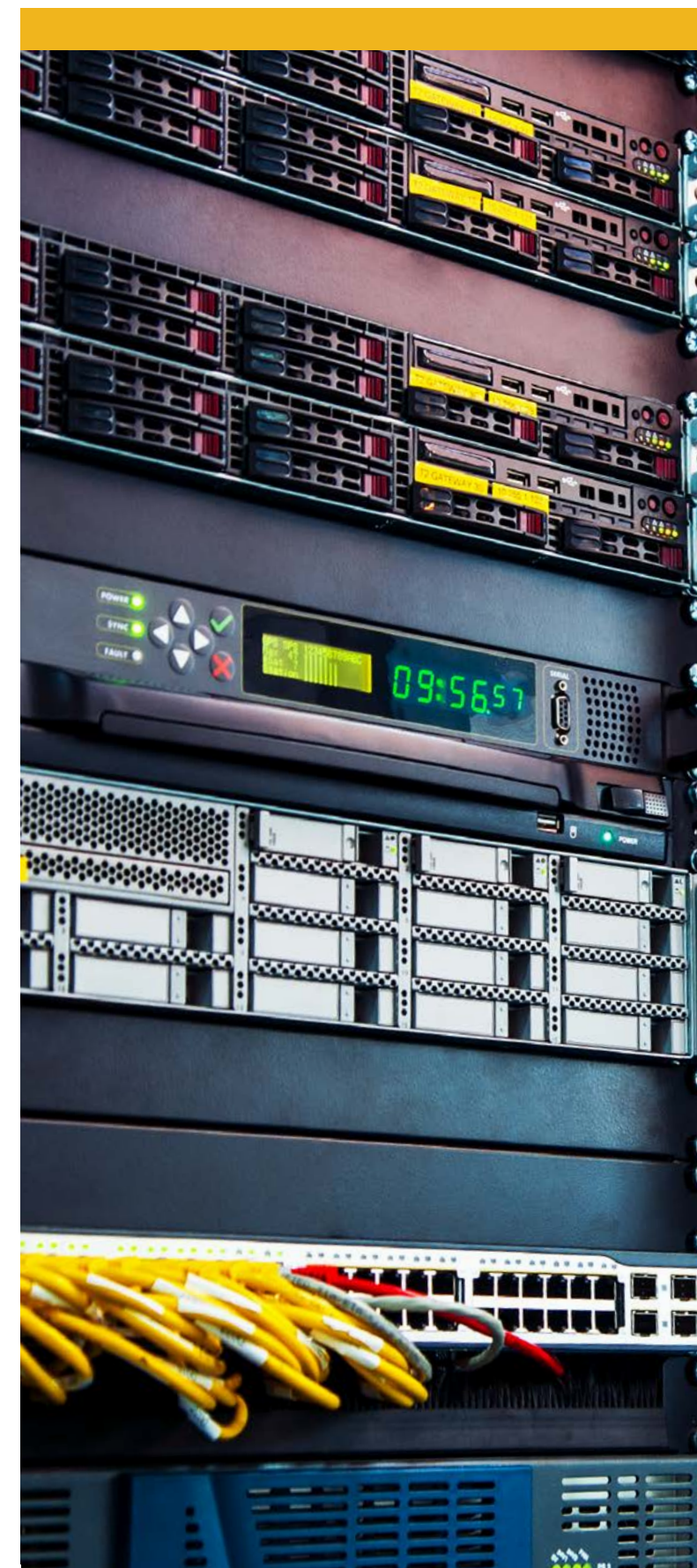
As we develop and offer products and services, we understand the role of cybersecurity in protecting our customers, their data, and our company.

#### At GM we:

- Implement cybersecurity by design as an integral part of all phases of the design and development process.
- Focus on our customers and their data, so our products are safe and secure.
- Speak up if we see an actual or potential cybersecurity issue.
- Engage our internal cybersecurity experts as appropriate so we understand and follow security development practices.



**NAVIGATE OUR POLICIES**  
[Cybersecurity Policy](#)







## PRIVACY

We are committed to respecting the privacy of individuals, including employees and customers.

### PROTECTING PERSONAL INFORMATION

We follow globally recognized privacy principles and strive to implement reasonable and appropriate practices in our collection, use, and sharing of personal information about individuals.

#### These principles and practices ensure that:

- Personal information can be used to support legitimate business purposes only.
- Privacy by design is incorporated into the development processes for products and services.



#### NAVIGATE OUR POLICIES

[Global Privacy Policy](#)

[Privacy Principles](#)







## DIVERSITY AND INCLUSION

We're proud of our diverse team and we value the unique talents, experiences, and perspectives each of us bring to GM. We work hard every day to create an inclusive workplace where diverse views are valued.

### COMMITMENT TO DIVERSITY

Diversity and inclusion are strengths. We respect what each individual brings to our team, including background, education, gender, race, ethnicity, working and thinking styles, sexual orientation, gender identity and/or expression, veteran status, religious background, age, generation, disability, cultural expertise, and technical skill. We believe our ability to meet the needs and expectations of an increasingly diverse and global customer base is tied closely to diversity and inclusiveness.

#### To this end, we are focused on:

- Finding and developing the best and brightest talent from around the world.
- Capitalizing on new and emerging markets.
- Leveraging the different traits and attributes in our workforce.



### WHICH WAY?

**Q** – I applied for a position with another team but learned it was offered to a less-qualified person. I think the reason was because the hiring manager knew that I am a disabled veteran. What should I do?

**A** – We require that employment decisions be based on objective criteria, regardless of an individual's status as a disabled veteran. If you suspect you were discriminated against, **speak up**.

### ENSURING EQUAL OPPORTUNITY

We are committed to fostering an accepting and inclusive work environment. We base employment decisions regarding qualified applicants or employees only on relevant considerations, such as the individual's qualifications and abilities and never on the basis of age, race, color, sex, religion, national origin, disability, sexual orientation, gender identity or expression, status as a disabled veteran, status as a Vietnam era veteran, other covered veteran status, or any other characteristic protected by applicable law.

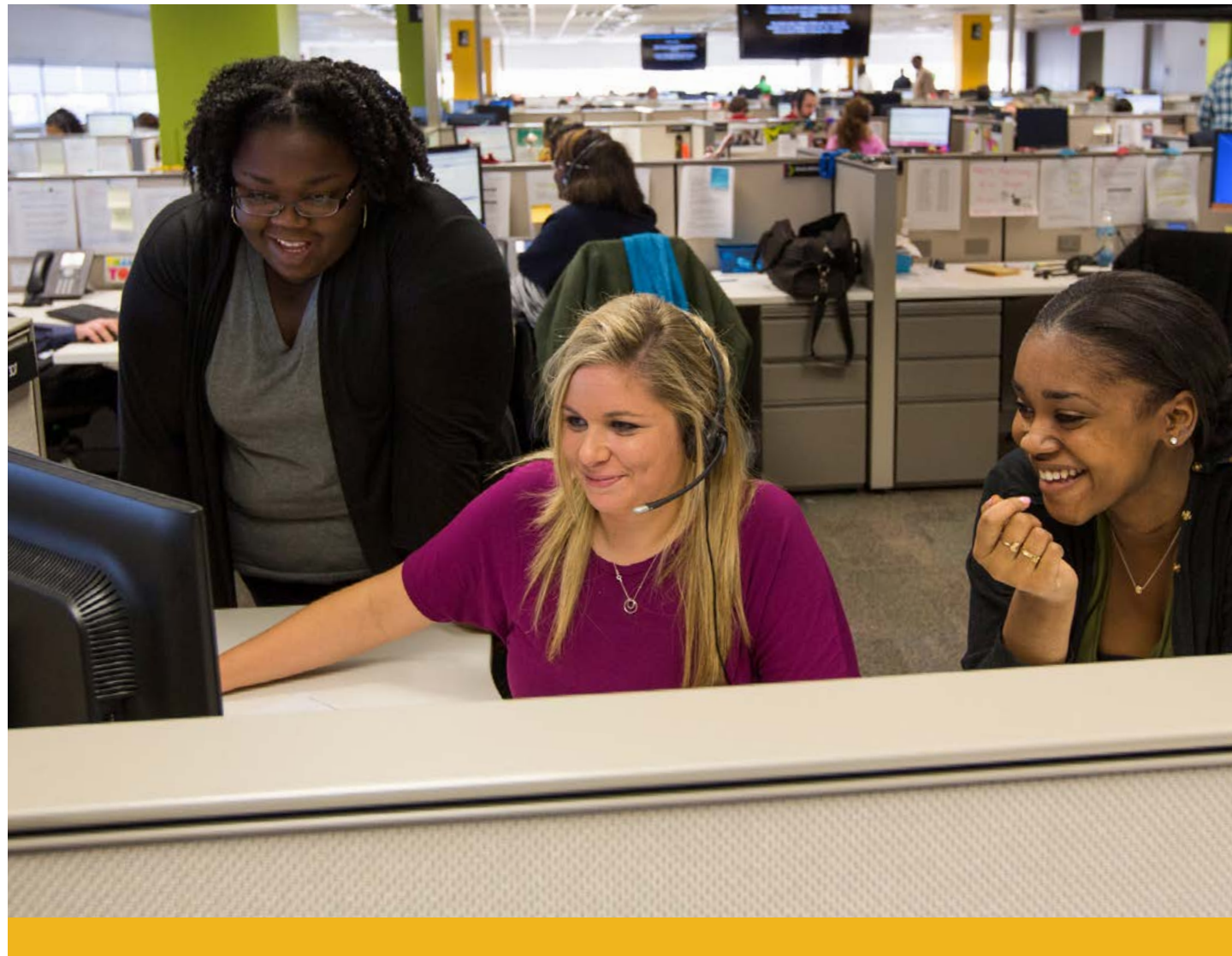


#### NAVIGATE OUR POLICIES

[GM Equal Employment Opportunity Policy](#)

[GM Policy Regarding Employment of Individuals with Disabilities](#)





## MAINTAINING A RESPECTFUL WORKPLACE

We appreciate the contributions of every member of our team and maintain a workplace where employees are treated with dignity and respect. We protect against unlawful discrimination or any behavior that creates an offensive, hostile, or intimidating work environment. We work to create a positive workplace where employees are able to do their jobs without fear of harassment or discrimination and we never tolerate retaliation against employees who report this activity in good faith.

### A POSITIVE WORKPLACE

Keep our workplace free from harassment and discrimination. [Speak up](#) if you see or suspect it.



### WHICH WAY?

**Q** – A supervisor has been making offensive and inappropriate jokes at work. I'm afraid I'll lose my job if I report the situation to my supervisor. Should I stay silent?

**A** – No. You should speak up about the matter to another internal resource.



### NAVIGATE OUR POLICIES

[GM Anti-harassment Policy](#)







## HUMAN RIGHTS

We respect the human rights and dignity of people throughout our operations and global supply chain. We comply and expect our suppliers to comply with: laws that promote safe working conditions and individual security; laws prohibiting forced labor; the employment of underage children; human trafficking; and laws that ensure freedom of association and the right to engage in collective bargaining.

### DIGNITY AND RESPECT

As a company, we work to protect the rights of everyone working for and with GM.

#### That's why we:

- Pay fair wages.
- Support the rights of all workers, including women, to work free from discrimination and unequal treatment.
- Value diversity and inclusion.
- Have meaningful grievance mechanisms in place.
- Have a strong anti-retaliation policy.

### HOLDING THIRD PARTIES ACCOUNTABLE

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.

If you witness or suspect a violation of human rights, [speak up](#).



### WHICH WAY?

**Q** – I saw a news article that says a contractor my coworker is considering for an upcoming project has been known to use child labor. I'm not involved in the decision, so is it my place to say anything?

**A** – Yes. Selecting a partner that has a history of engaging in human rights abuses is against GM's values and could put our company at risk. You should tell your coworker or another appropriate internal resource what you know about the contractor to help inform GM's decision.





## ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

As part of our commitment to environmental stewardship, we support environmentally friendly and sustainable business practices and work to reduce our carbon footprint. We integrate responsible environmental practices into our business decisions and are dedicated to increasing efficiency throughout our company.

### GM ENVIRONMENTAL PRINCIPLES

As a responsible corporate citizen, we are dedicated to protecting human health, natural resources, and the global environment. This dedication reaches further than compliance with the law to encompass the integration of sound environmental practices into our business decisions. The following Environmental Principles guide our daily business practices.



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



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



We will continue to participate actively in educating the public regarding environmental conservation.



We will continue to pursue vigorously the development and implementation of technologies for minimizing pollutant emissions.



We will continue to work with all government entities for the development of technically sound and financially responsible environmental laws and regulations.



We will continually assess the impact of our plants and products on the environment and the communities in which we live and operate with a goal of continuous improvement.



### WHICH WAY?

**Q** – I recently learned that one of our new vehicles has a design flaw that may cause it to leak fluids that can harm the environment. What should I do?

**A** – Whenever you learn of or suspect a flaw that could have a negative impact on the environment or on human health, **speak up**.

Stay alert to and **report** activity that you believe could harm the environment or pose a danger to human health.



**NAVIGATE OUR POLICIES**  
**Global Environmental Policy**

**Global Substance of Concern Policy**





# WE DO WHAT'S RIGHT

We work with integrity, honesty, and high performance every day. We follow the law and avoid conflicts of interest. Our reputation depends on it.





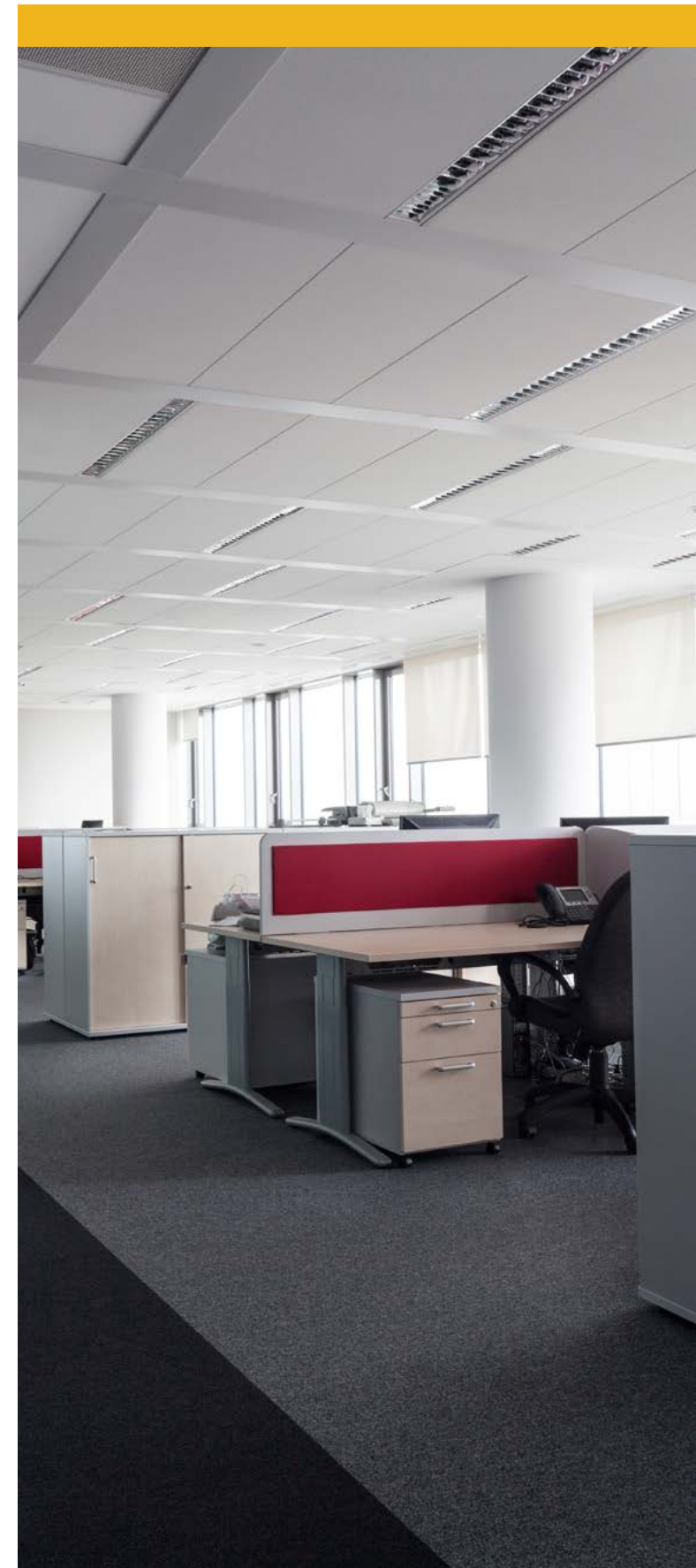
## ANTI-CORRUPTION, ANTI-BRIBERY

Corruption can harm communities, cause damage to our reputation, and disrupt markets. That's why we're committed to winning customers and business based on the merit of our products and never because of bribery or other illegal activity.

### RECOGNIZING AND AVOIDING BRIBERY

Bribery involves exchanging or offering something of value (referred to in our policies as a “gift”) to improperly influence a business decision or obtain a business advantage. Bribes can take many forms and include things like giving cash, gift cards, entertainment, inappropriate discounts, hiring a family member or a friend of someone you seek to influence, or even making certain charitable contributions.

Anti-bribery laws prohibit anyone, including government officials and private individuals, from offering, accepting, receiving, or giving bribes. In some countries, [facilitation payments](#) are a common business practice, but under our Code, these are prohibited too. Violating these laws or our Code can have serious consequences for you and our company, including damage to our reputation, fines, and jail time. Follow the law, our Code, and our policies and avoid activities that even suggest something improper.





**We each have a responsibility to:**

**Maintain ethical relationships with third parties.** Practice [due diligence](#) and treat third parties fairly. Never offer or exchange anything with a third party that could appear to have been offered to obtain a business advantage. Understand that we may be held liable for acts of bribery committed by third parties, so if you are aware that a third party is or may be engaging in unethical or illegal activities, do not participate and alert Legal Staff to the unethical or illegal conduct. Never ignore warning signs that a third party may be engaging in illegal or unethical activities.

**Exercise special care when doing business or interacting with the government or third parties that will interact with the government on GM's behalf.** Government officials not only include elected and appointed officials, but also anyone who works for a government agency or a state-owned or controlled entity. Pay attention to [warning signs](#). Strict rules apply when working with the government, so be careful not to provide anything of value to a government official without checking and following our policies. This includes even small payments, such as “facilitation” or “grease” payments.

**Keep accurate records.** Record transactions promptly and honestly in accordance with our internal controls. Follow our policies and keep accurate records of every business transaction.

**SPECIAL CONSIDERATIONS**

Certain aspects of our business can pose an increased risk when they involve government officials. Be careful and make sure you understand our policies when engaging in any of the following activities:



Fleet sales.



Test drives or loans of vehicles.



Vehicle discounts.



Media/marketing events.

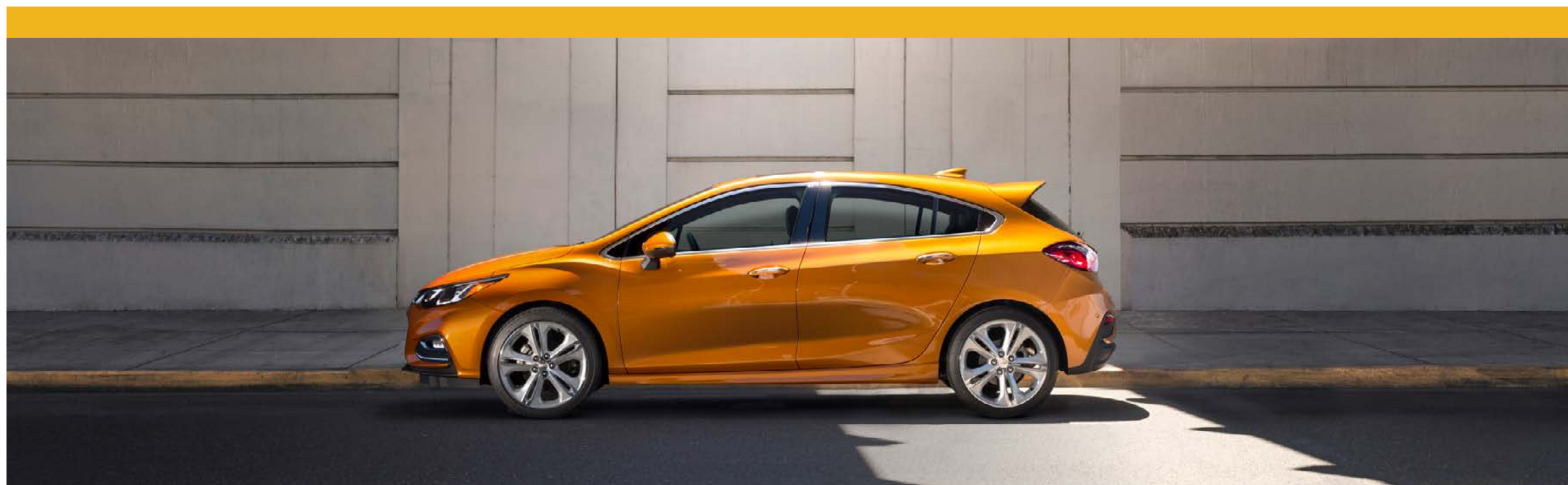


Interactions with government entities or officials.

**WHICH WAY?**

**Q** – I know someone who works for a foreign government agency. He asked if I would be willing to hire his daughter as an intern for the summer. He implied that offering her the position might help GM win contracts in the future with his agency. Would it be okay if I offered her a position or recommended her to another department for a position?

**A** – No. Offering the official's daughter a position or ensuring she receives special consideration in the hiring process could be considered a form of bribery and may violate anti-bribery laws. Even if it wouldn't violate the law, it would still violate our policies. You should report the offer to Legal Staff.

**NAVIGATE OUR POLICIES**[Global Integrity Policy](#)





## GIFTS, ENTERTAINMENT, AND HOSPITALITY

While accepting or providing gifts, entertainment, and hospitality can strengthen business relationships, it can also create conflicts of interest. We protect our reputation by ensuring that gifts are legal, appropriate, and reasonable.

### RESPONSIBLE GIVING AND RECEIVING

We never accept or provide anything of value (a “gift”) that may create a conflict of interest or suggest something improper. Inappropriate gifts include those that create an obligation, are in the form of cash, or appear to be lavish or extravagant.

Know the difference between what’s acceptable and what’s not. Never solicit gifts or favors and refuse any gift that doesn’t comply with the law, our Code, or our policies.

### GIFTS – GENERAL PRINCIPLES

#### Gifts are acceptable if they are:

- Related to GM’s legitimate business goals.
- Not designed or perceived to influence in the performance of work duties.
- Reasonable in value and appropriate to the occasion – not lavish.
- Infrequent or occasional.
- Not cash or cash equivalents (e.g., gift cards).
- Honest, transparent.
- In compliance with all applicable laws and with the policies of the recipient’s employer.







## APPROVAL THRESHOLDS – U.S. AND NON-U.S. GOVERNMENT OFFICIALS

### U.S. GOVERNMENT OFFICIALS

A U.S. government official means any elected or appointed official or any employee of the legislative, executive, or judicial branches of the U.S. federal government or a state or local government.

U.S. government officials may be subject to ethics codes and laws that strictly regulate what they can accept from you and private companies like GM. We are required to seek written approval from the [GM North America \(NA\) Regional Compliance Officer](#) or designee specified in writing, before offering or providing anything of value to a U.S. government official, unless all of the following conditions are satisfied:

1. The item is worth less than \$10 USD.
2. It is permissible under applicable law, regulations, rules, and ethics policies.
3. It is done infrequently.
4. It is not being done for an improper purpose and would have no appearance of impropriety (for example, to obtain or retain business or cause the official to take action or inaction in an official capacity, or thank the official for any action/inaction).

### NON-U.S. GOVERNMENT OFFICIALS

A non-U.S. government official includes any elected or appointed official, as well as any employee in the legislative, executive, or judicial branches of any non-U.S. government, from the local level to the national level.

#### The term also includes:

- Anyone acting in an official capacity on behalf of a non-U.S. governmental entity, even if that person is not a government employee or an elected or appointed official.
- Employees and officers of public international organizations, such as the United Nations, the Red Cross, and the World Bank.
- Non-U.S. political parties, officials, or candidates for office.
- Members of royal families.

Finally, business people who work for a non-U.S. state-owned or state-controlled company also constitute government officials.

In order to reduce the risk of improper payments or other benefits to non-U.S. government officials, we are required to seek written approval from the [Regional Compliance Officer](#) before offering or providing anything of value to a non-U.S. government official unless all of the following conditions are satisfied:

1. The item is worth equal to or less than \$25 USD (or local currency equivalent).
2. It is permissible under local laws, regulations, rules, and ethics policies.
3. It is done infrequently.
4. It is not being done for an improper purpose and would have no appearance of impropriety.

Please be aware that local country gift policies may set different limits.





APPROVAL THRESHOLDS – THIRD PARTIES (NON-GOVERNMENT)

Before offering or accepting anything of value to or from any non-government third party (e.g., a supplier), make sure it complies with our [Global Integrity Policy](#) or your local country policy. Use the following tool to help you determine when to get approval. Convert the values to your local currency. The approval thresholds that follow are summaries.

VALUE	APPROVAL REQUIRED
\$50 OR LESS	NO APPROVAL REQUIRED PROVIDED IT MEETS THE GENERAL PRINCIPLES.
BETWEEN \$50 AND \$150	WRITTEN PRE-APPROVAL FROM YOUR SUPERVISOR.
\$150 OR MORE (OR A TOTAL VALUE OF \$500 OR MORE IN ANY CALENDAR YEAR)	WRITTEN PRE-APPROVAL FROM YOUR SUPERVISOR AND THE <a href="#">GLOBAL ETHICS AND COMPLIANCE CENTER</a> .

Our policies also prohibit providing gifts, entertainment, or gratuities to union representatives without first receiving Legal Staff approval.



WHICH WAY?

**Q** – A dealer gave me a small pad of paper with his company’s logo on it. Can I keep it?

**A** – Yes. You can generally accept appropriate gifts that are promotional in nature and that have a value of \$50 or less.



NAVIGATE OUR POLICIES  
[Global Integrity Policy](#)







## CONFLICTS OF INTEREST

We're loyal and always act in the best interest of our company and our customers. We avoid conflicts of interest and never use our position or company assets for personal gain.

### AVOIDING CONFLICTS

A conflict of interest arises when our personal interests interfere with your GM job or ability to make objective decisions on behalf of our company. We work to avoid even the appearance of a conflict.

Although our Code does not list every situation that can present a conflict, there are a few instances where conflicts typically arise:



**Personal relationships** – Supervising a friend, family member, or someone with whom you have a romantic relationship.



**Outside activities** – Allowing a second job or service to another organization to take away the loyalty, time, energy, or talent you bring to your position or present a conflict with your GM responsibilities.



**Financial interests** – Investing in a company that does business with or competes with GM.



**Business opportunities** – Taking an opportunity you learned about through your work at GM for yourself or starting a business that competes with our company.



**Family members** – Allowing a member of your family to receive improper personal benefits as a result of your position with our company.







The [Conflict of Interest Policy](#) contains more information. Employees are required to complete an electronic conflict of interest questionnaire. New conflicts, or changes to existing conflicts, must be disclosed within 30 days. If you're unsure whether a particular situation creates a conflict, seek guidance.

### IS IT A CONFLICT? **Ask yourself:**

Does it interfere with the work I do for GM?

Am I using company resources, relationships, or my position for personal gain?

Could it appear to be a conflict of interest to someone else?

Does it compete with GM's interests?

Did you answer “**yes**” to any of these questions? If so, stop, [ask for guidance](#) and as may be required, disclose the potential conflict via the electronic questionnaire.



### WHICH WAY?

**Q** – My sister works for a vendor that we're evaluating to provide marketing services. I work for the team in charge of selecting the vendor. What should I do?

**A** – This situation could create a conflict. Disclose it to your supervisor immediately, update your conflict of interest electronic questionnaire, and remove yourself from the decision-making process.

Even the appearance of a conflict of interest can harm our company and its reputation.



**NAVIGATE OUR POLICIES**  
[Conflict of Interest Policy](#)







## THIRD PARTIES AND SUPPLIERS

As a company, we seek to do business with organizations that will meet our high standards and act in ways that positively reflect on our company. We choose our third parties carefully and take appropriate measures to ensure they meet contractual requirements and follow the law, our Code, and our policies.

### BUILDING ETHICAL RELATIONSHIPS

When selecting third parties, practice appropriate due diligence.

Evaluate potential third parties based on legitimate business criteria, such as:

- Safety
- GM's needs
- Cost
- Quality
- Services offered
- Availability
- Reputation and integrity

Treat third parties fairly and with integrity, avoid conflicts of interest, and even the appearance of impropriety. Just as it's important to protect GM information, it's important we protect our third parties' confidential information and let them know that we expect them to protect ours.



### WHICH WAY?

**Q** – One of our vendors is under investigation for dishonest accounting practices. Since it doesn't affect GM directly, it's not our problem, right?

**A** – No, that's not right. We expect everyone we work with to operate ethically. The vendor's practices could affect their ability to serve our needs and subject GM to reputational harm. You should report the matter right away so that we can respond appropriately.

Everyone at GM has a responsibility to stay alert to possible safety issues, violations of the law, our Code, or our policies committed by third parties. If you have any concerns about a third party, specific party, or situation, [speak up](#).



**NAVIGATE OUR POLICIES**  
[Global Integrity Policy](#)

[Due Diligence Protocol](#)





## A COMPETITIVE MARKETPLACE

Many countries have laws prohibiting companies from gaining an unfair advantage in the market. Violations can have serious consequences for you and our company.

Know and comply with our policies and all applicable laws and maintain ethical relationships with our competitors and third parties. Always use good judgment and avoid agreements and discussions about competitive matters. Understand that U.S. anti-competition laws may apply to the actions of our subsidiaries around the world. If you're ever unclear about the laws and regulations that apply to your work, [seek guidance](#).

### Compete fairly:

- Never make agreements that may create an unfair advantage in the market, such as those to fix prices, divide customers, or prevent competitors from entering the market.
- Don't discuss competitively sensitive topics with competitors, such as price, contract terms, or marketing plans.
- Understand that even casual conversations could be considered anti-competitive, so be mindful about what you discuss with others, especially competitors.
- Get Legal Staff and business approval before benchmarking with a competitor.

If you witness conduct that violates fair competition laws, remove yourself from the situation and notify Legal Staff immediately.

# FAIR COMPETITION AND ANTITRUST

We comply with both the spirit and the letter of competition laws and are committed to doing business fairly, everywhere we operate.





## RELATIONSHIPS WITH DEALERS, DISTRIBUTORS, AND RESELLERS

It's against our policies and the laws of most countries to force dealers, distributors, or retailers to sell our products at a particular price. While we can set a suggested price, each seller is free to set the sale price with customers. If you have any questions about our obligations under the law or our policies, contact Legal Staff.

## GATHERING COMPETITIVE INFORMATION

We understand that gathering competitive information is a normal part of doing business. However, we each have a responsibility to gather this information responsibly and in accordance with our policies.

### Obtain information ethically:

- Use publicly available sources whenever possible.
- Don't ask for sensitive or confidential business information directly from a competitor.
- While it may be okay to ask customers and third parties about competitors, be sure to do so with integrity and never use our business relationships to obtain information improperly.
- Never ask current or former employees of competitors to share confidential business information.



## WHICH WAY?

**Q** – We just hired someone who used to work for one of our competitors. Is it okay if I ask him about some of the secret new products his company was developing before he left?

**A** – No. It's never appropriate to ask former employees of competitors to disclose confidential business information. We have a responsibility to gather competitive information ethically.



## NAVIGATE OUR POLICIES

### [Competition Law Policy](#)







## INTERNATIONAL TRADE

We're proud to do business in many countries around the world. As a global company, we are subject to a number of trade compliance laws.

We honor our obligations under these laws and trade with integrity.

### EXPORT CONTROLS AND ECONOMIC SANCTIONS

Export controls and economic sanctions regulate where and with whom we can do business. These laws vary widely around the world. The laws of more than one country may govern a particular transaction. Failure to comply with these laws can seriously impact our business and reputation, lead to significant fines, and can even result in the loss of our export privileges.

### When conducting business internationally:

- Comply with our policies and applicable law.
- Verify that the transactions do not involve restricted or sanctioned individuals, entities, regions, or countries.
- Know that in certain countries where GM does business, economic sanctions, embargoes, and other applicable laws may differ from those in the U.S. Contact Legal Staff for guidance.
- Review the export classifications of any hardware, software, technology, or services and ensure any required export licenses or other authorizations are in place before proceeding.
- Document transactions completely and accurately.

If you have questions about the laws that apply to your work or your responsibilities or if you suspect a violation of export controls or other trade compliance laws has occurred or is about to occur, contact your Export Compliance Officer, the [GM Office of Export Compliance](#), Legal Staff, or the [GM Awareline](#).



**NAVIGATE OUR POLICIES**  
[Export Compliance Policy](#)

An **export** occurs when items are moved across international borders and not only includes physical shipments of goods to other countries, but could also include transfers of software, data, and technological know-how via email, telephone, fax, or shared drives. Some countries consider sharing technical information with a foreign national to be an export, even if the information never physically leaves the country.



### WHICH WAY?

**Q** – An existing GM dealer wants to buy several hundred vehicles that they will then re-sell to a customer in another country. This seems like a great business opportunity, but I think the end customer is in a country subject to broad economic sanctions. What should I do?

**A** – In many cases, GM cannot sell to someone if we know or have reason to know the goods are intended for a sanctioned country. Please contact your Export Compliance Officer, the [GM Office of Export Compliance](#), or Legal Staff if you believe a customer or potential customer intends to send GM goods or services to a sanctioned country. If you are outside of the United States, please contact local Legal Staff for guidance as local laws may differ from those in the U.S.





## ANTI-MONEY LAUNDERING

We stay alert for signs of potential money laundering and other crimes.

### PREVENTING FINANCIAL CRIMES

Money laundering is a process criminals, terrorists, and others use to move funds gained from illegal activity through legitimate businesses to make the funds appear legitimate. Use good judgment and pay close attention when working with customers and third parties, especially if the transaction involves cash payments. Always know who's behind every transaction and only conduct business with reputable third parties engaged in legitimate business activities. Take action to prevent the use of our activities for these purposes by reporting suspicious activity to Legal Staff.

## INSIDER TRADING

Under U.S. securities and other trading laws, we may not trade based on inside information about a company or share that information with anyone else.

### TRADING ETHICALLY

Through your work, you may have access to **material, nonpublic information** about GM or a customer, competitor, or third party. This information is considered “inside” information. Trading company, competitor, or third party securities while in possession of inside information is considered “insider trading” and is illegal.

### Inside information can include information about:

- Financial earnings or losses
- Potential significant business deals
- Budgets
- Changes in executive leadership
- Significant transactions
- New products or projects

If you have access to inside information, never trade on it or share it with others until after it's been released to the public. Passing inside information along to anyone who may use it in a decision to invest, including family, friends, or third parties is also a form of insider trading known as “tipping.” Exercise caution and avoid even the appearance of anything improper. If you have any questions regarding what is inside information, contact Legal Staff.



### WHICH WAY?

**Q** – GM is working secretly to buy a start-up company with new technology. I am working on the confidential project and before any details have been made public, I told my sister that she should purchase stock in the company. Have I done anything wrong?

**A** – Yes. Even though you told your sister the information was confidential, you may have engaged in “tipping” by sharing the material inside information with her.

Material inside information may be used only after it has been released to the public through a press release, government filing, or other official communication.



### NAVIGATE OUR POLICIES

[Insider Trading Policy](#)

[SEC Rule 10b5-1 Trading Plan Policy](#)





## WORKING WITH THE GOVERNMENT

Very often, the laws that apply when working with the government may be stricter than those that apply when working with private companies. As with everyone we do business with, we work to be a responsible partner to the government and adhere to the highest ethical standards.

### INTERACTING WITH INTEGRITY

We're committed to building open, honest, and transparent relationships with all of our third parties, including government agencies. We follow all applicable laws and interact honestly and fairly with government representatives.

#### When **working** with governments:

- **Understand** the rules that apply to your work.
- **Follow** the rules governing the procurement process and GM's ongoing compliance commitments.
- **Submit** complete, timely, and accurate information.
- **Do not** offer or give anything of value to a government official unless it is in compliance with applicable laws and our Code and you have obtained written pre-approval as may be required by the Integrity Policy.

#### With government **investigations** and **audits**:

- **Forward** all requests to Legal Staff immediately.
- **Cooperate** fully.
- **Know** that we prohibit retaliation for reporting misconduct or safety concerns in good faith.
- **Provide** truthful, complete, and accurate information.



### WHICH WAY?

**Q** – I received notice that a government official will be visiting our office as part of an emissions investigation. The notice included a list of items that we need to prepare before the official's visit and a list of employees who will be interviewed. When I told my supervisor about the notice, she asked me to destroy or "lose" some of the documents we were asked to provide. What should I do?

**A** – Refuse your supervisor's request, forward the notice to Legal Staff, and ask for their assistance in preparing for the government official's visit. Also, make Legal Staff aware of your supervisor's inappropriate request. You may also use the Awareline or the Monitor Hotline to report your supervisor's request to destroy the documents.



### NAVIGATE OUR POLICIES [Global Integrity Policy](#)





## POLITICAL ACTIVITIES AND LOBBYING

Being involved in the political process is an important part of being a good citizen. We respect the rights of all of our employees to engage in the political process and encourage political participation.

### POLITICAL PARTICIPATION

Though we respect your involvement in political activities, make sure they remain separate from your work at GM. Know that we never reimburse anyone for political contributions or expenditures.

#### Always:

- **Engage** in political activities on your own time.
- **Use** your own resources to further political causes, candidates, or campaigns.
- **Avoid** speaking on behalf of our company.
- **Follow** applicable laws and regulations.

Obtain approval from [Public Policy](#) before participating in any lobbying activity on behalf of GM.



### WHICH WAY?

**Q** – Can I use our printers to print promotional materials for a political candidate I support – if I use it after hours?

**A** – No. You must not use GM resources to support your personal political activities – even if you plan to use them after hours.



### NAVIGATE OUR POLICIES

[GM Corporate Political Contributions – U.S. Only](#)

[GM Lobbying Policy – U.S. Only](#)





## COMMUNITY INVOLVEMENT AND CORPORATE CITIZENSHIP

We are committed to making a difference in the communities where we live and work. We support initiatives that strengthen communities and encourage our employees to get involved.

### GIVING BACK

As a company, we support a variety of charitable causes in accordance with our corporate giving policies and priorities through GM philanthropy. We invest in social programs to advance education in Science, Technology, Engineering, and Math (STEM) subjects, fuel safer practices in and around vehicles, and strengthen neighborhoods and empower residents. Our employees volunteer in numerous projects to support our local communities.

If you choose to volunteer in charitable activities outside of work, avoid conflicts of interest and never use company time or resources unless you have permission to do so.



### WHICH WAY?

**Q** – I am involved in a personal charitable activity in my community. May I obtain a list of GM suppliers that I work with and use my GM letterhead to solicit them to contribute to my personal charitable activity?

**A** – No, soliciting GM suppliers for personal charitable activities may create the appearance of impropriety or a conflict of interest. Relationships with suppliers and the procurement process should be based solely on legitimate business concerns.







# WE PROTECT OUR COMPANY

We pay attention to the details and make integrity the center of everything we do. That's part of how we make the customer our compass.





## ACCURATE RECORDKEEPING AND FINANCIAL REPORTING

We maintain books and records that accurately reflect our business and financial situation. All of us have a responsibility to record transactions honestly and handle our records with care.

### ACCURATE RECORDKEEPING

We protect the integrity of our records. Our company may face serious penalties or consequences if we don't keep accurate records of financial transactions and company information. If you're responsible for preparing public financial disclosures, make sure that the information we report is clear, complete, and timely. Watch for and [report](#) signs of potential fraud, bribery, or money laundering activity.

### RECORDS MANAGEMENT

We manage our records properly and retain the records we need to support our tax, financial, and legal obligations. Always follow our records retention policies and securely dispose of records that are no longer needed. Remember to never dispose of any information that may be relevant to an investigation or subject to a litigation hold.



### NAVIGATE OUR POLICIES

[Information LifeCycle  
Management \(ILM\) Policy](#)

[GM's FCPA  
Accounting Standards](#)

[Litigation Holds Policy](#)







## USE OF COMPANY ASSETS

Our assets are the tools and information we use in our work each day. We use our assets for legitimate business purposes and we handle them with care and protect them from loss, theft, fraud, and misuse.

### PRESERVING OUR ASSETS

Our assets include physical assets, technology, and GM information. We always use our resources efficiently, responsibly, and in accordance with our policies.

#### Safeguard our assets:

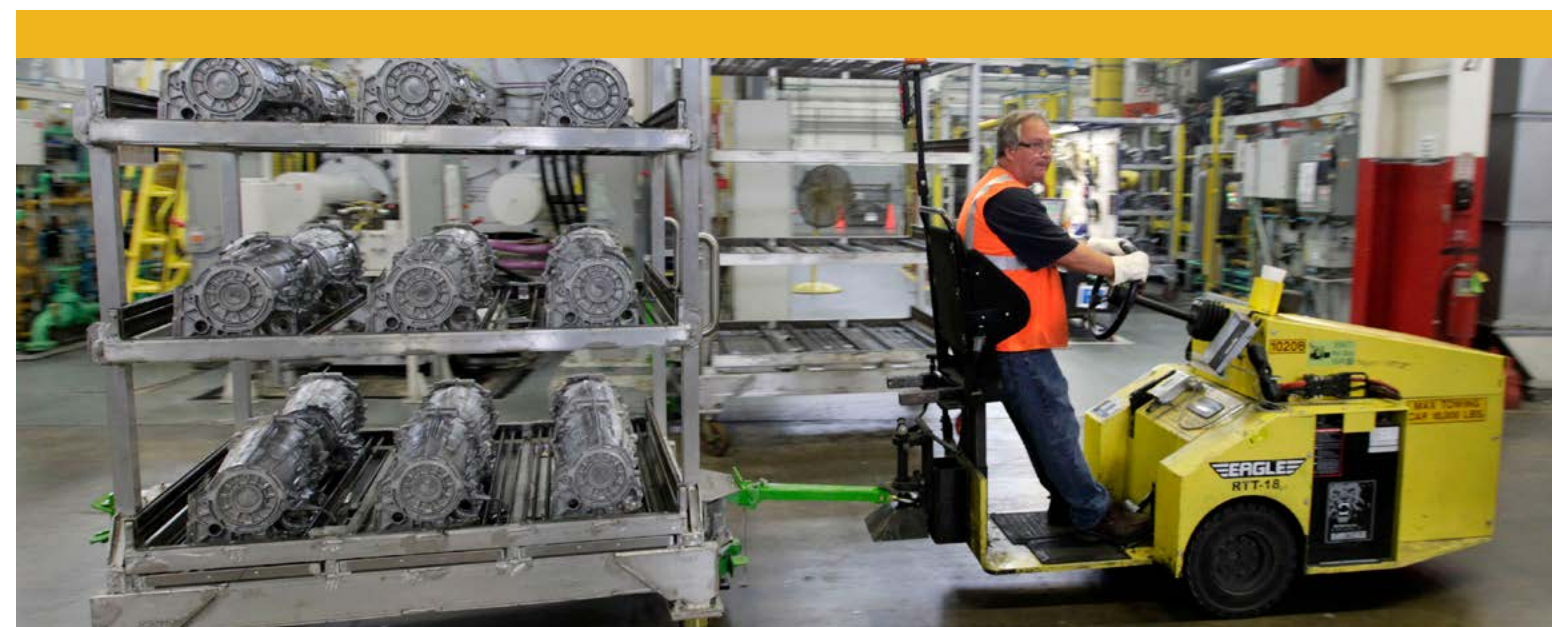
- Keep valuable assets, such as laptops and mobile devices, physically and electronically secure.
- Use company vehicles only as authorized by your supervisor.
- Let your supervisor know if any of our assets are damaged or in need of repair.

### USING TECHNOLOGY RESPONSIBLY

Use technology in accordance with our policies. While we allow reasonable personal use of our technology resources, use good judgment. Keep in mind that anything you create, store, download, send, or receive using our systems is company property and can be reviewed by us at any time, as permitted by applicable law.

#### When using our technology:

- Never access, store, or transmit anything that's intimidating, obscene, or discriminatory.
- Use strong passwords and keep passwords safe.
- Lock your workstation when stepping away.
- Install security software and updates as directed by GM and do not interfere with automatic updates.







## PROTECTING GM SECRET AND GM CONFIDENTIAL INFORMATION

All GM information, unless approved for public distribution, is by default considered confidential and must be protected. We all have a responsibility to safeguard GM information and the confidential information of our employees, customers, and third parties. Trade secrets and certain business information, whose disclosure or loss would result in a substantial negative impact to our company, employees, third parties, and customers require additional protections such as encrypting the information.

### GM secret information can include:

- **Future product information** – strategies, ideas or company processes, vehicle designs, financial information, business communications, or pricing information.
- **Sensitive personal information** – bank account information, birthdates, or government identifiers.

### Keep all of our GM information safe:

- Only access the information you need to do your job.
- Avoid discussing GM information in public places where others can hear.
- Never email GM information to your personal email account or remove confidential information from GM.
- Share GM information only with authorized third parties who have a legitimate business reason to know the information and have included our security terms in their agreement or contract.
- Immediately report suspected theft or abuse of confidential, proprietary, or trade secret information.
- Protect our network from viruses and downtime by only installing approved software and installing security software and updates as directed by GM.

Your responsibility to protect GM information does not end when you leave GM. Even if you decide to leave our company, you still have an obligation to protect our information.



## WHICH WAY?

**Q** – I received an internal email with confidential business information. I know I can't share it with anyone outside of our company who isn't authorized to see it, but can I share it with a coworker?

**A** – You should only share confidential business information with employees who are authorized to see it and have a need to know the information as part of their job duties.



### NAVIGATE OUR POLICIES

[Acceptable Use Guide to Protecting GM Information and Resources](#)

[User Information Security Policy](#)

[Global Privacy Policy](#)

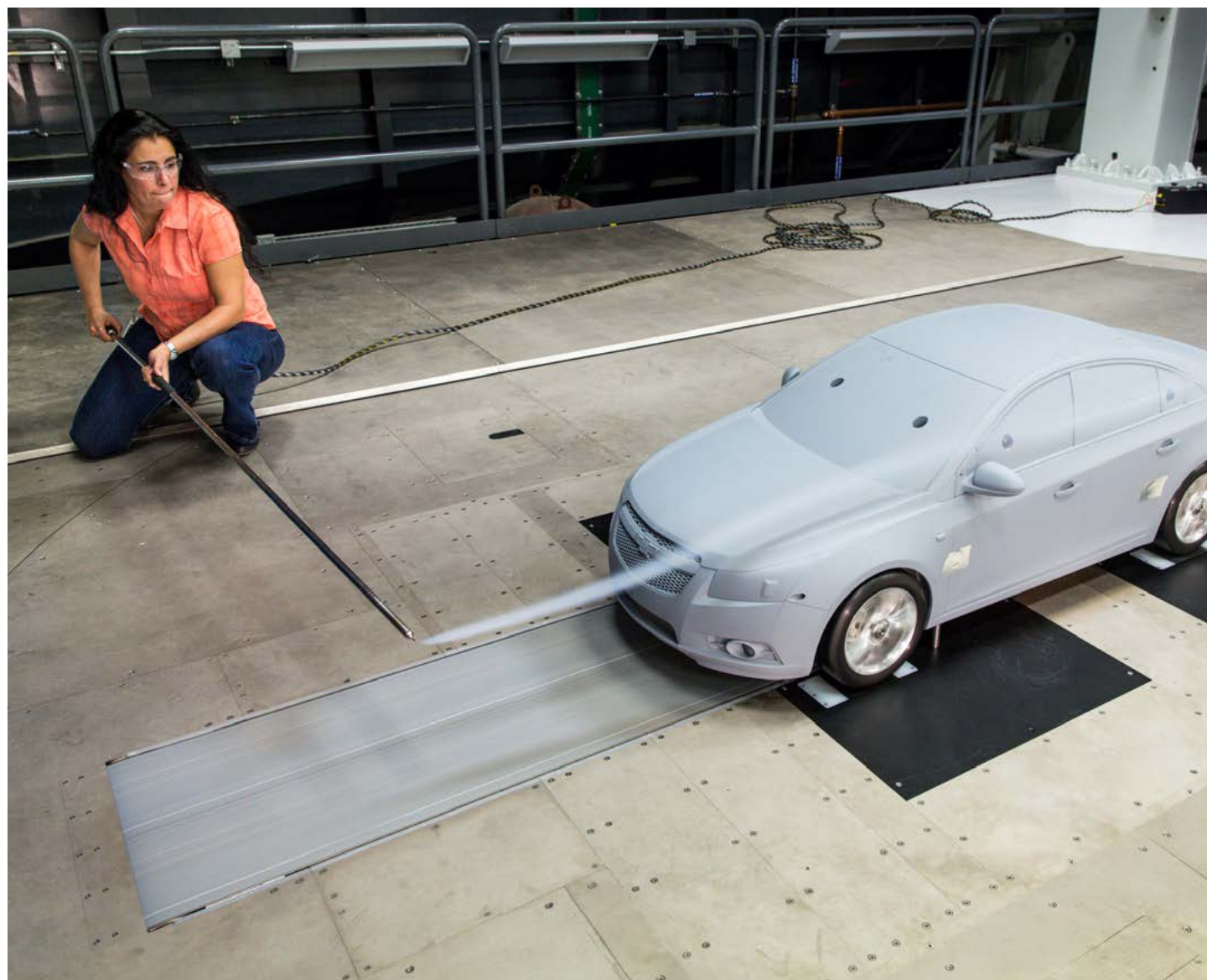
[Information LifeCycle Management \(ILM\) Policy](#)

[Information Security Policy](#)

[Litigation Holds Policy](#)







## INTELLECTUAL PROPERTY

GM's Intellectual Property (IP) assets contribute to our ability to effectively conduct our business and to grow and achieve our business objectives. These assets include the ideas, inventions, know-how, designs, software, business information, financial data, trademarks, copyrights, patents, apps, and all other proprietary information made for GM or made by GM employees. We respect our IP and the IP of others.

### PROTECTING INTELLECTUAL PROPERTY

All of us have a responsibility to identify, protect, and defend our IP and promptly identify and report any conflicts including unauthorized disclosure and violations of infringements by any third party of GM's IP. We respect the intellectual property of others and will not knowingly violate the valid IP rights of third parties. We expect the same consideration from our competitors and customers. Know that anything you create within the scope of your employment with GM may be considered company intellectual property.



### WHICH WAY?

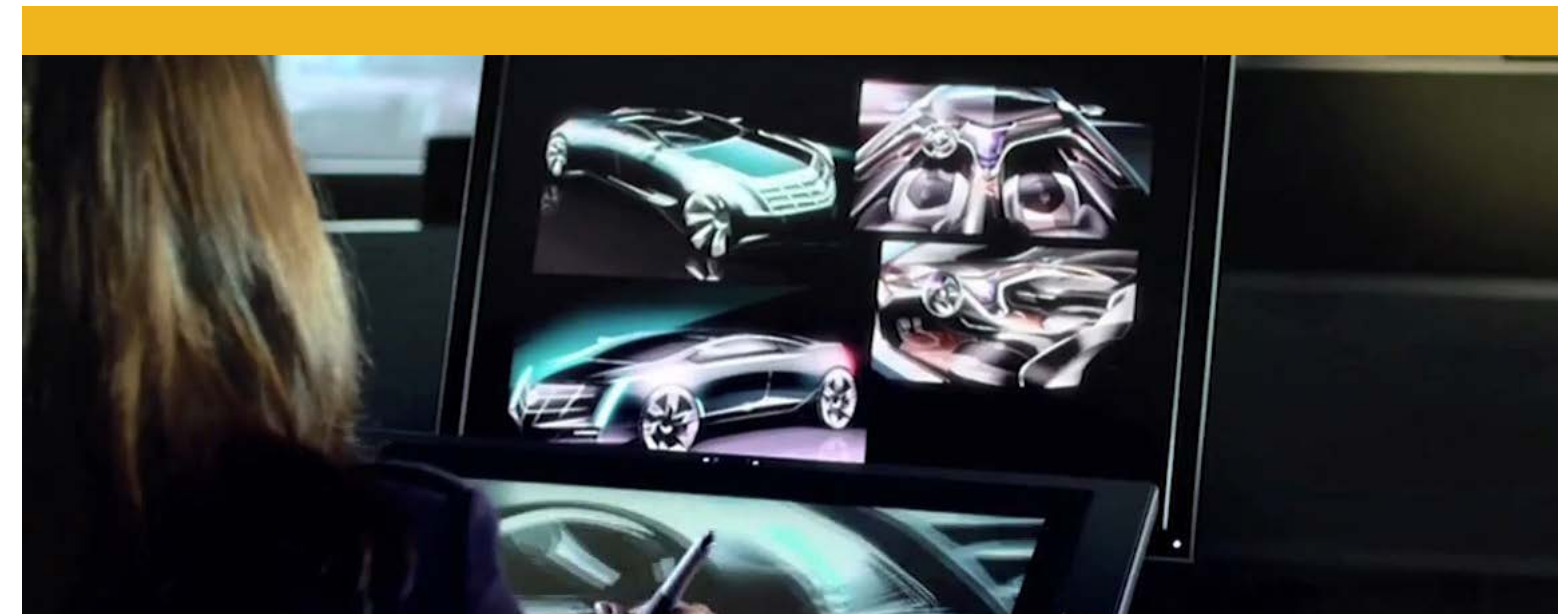
**Q** – I found a picture from another company that I think would look great in our marketing materials. Since it's available online, I don't need permission to use it, right?

**A** – No, that's not right. Using the photo without permission could infringe on the company's IP rights. You should always get permission before using the IP of another person or company.



### NAVIGATE OUR POLICIES

**Intellectual Property:**  
**Trademarks, Patents, and**  
**Technical Information**





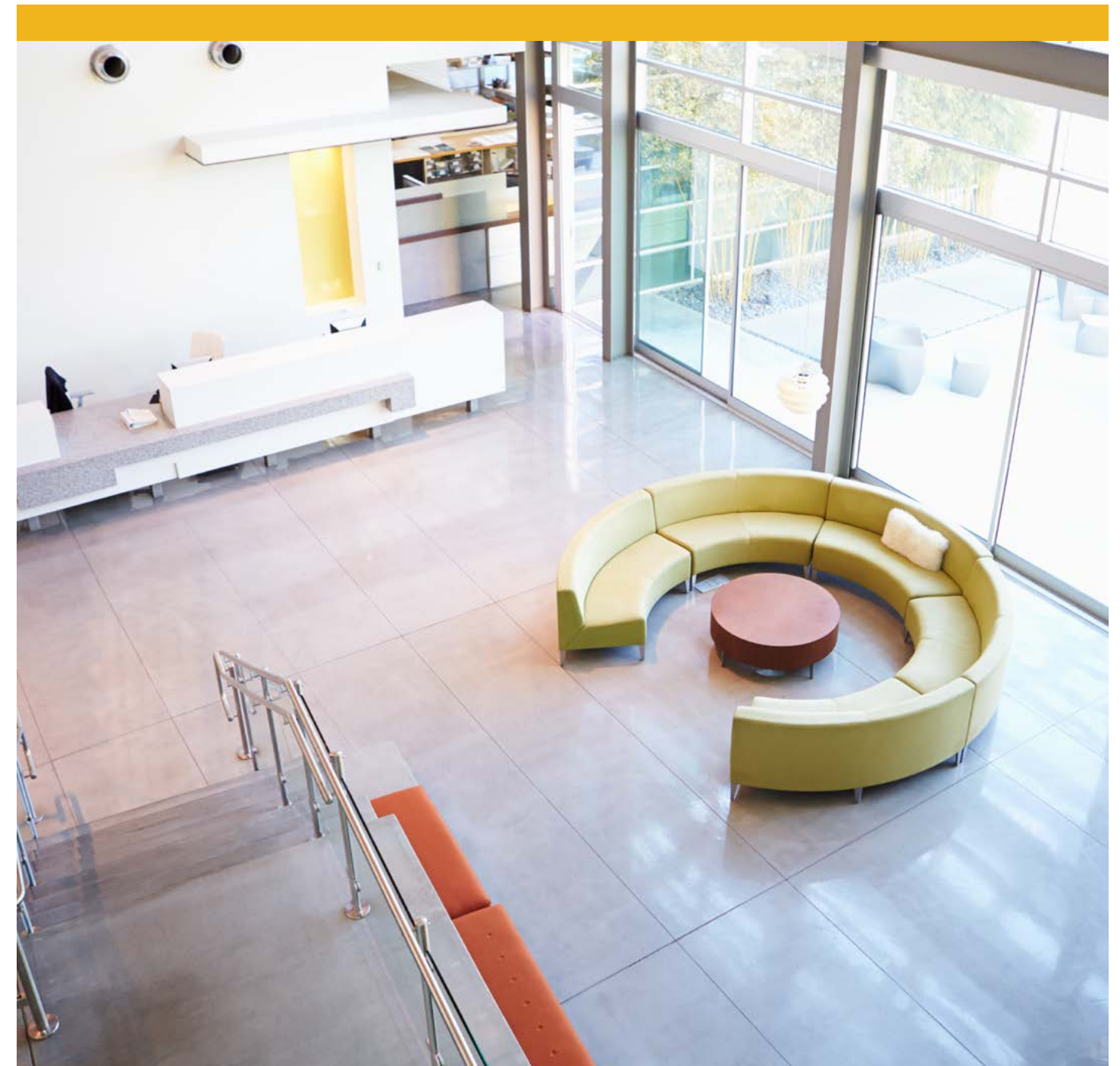


## WORKPLACE VIOLENCE

Everyone deserves to work in a safe and secure workplace. That's why we maintain a workplace free of intimidation, threats, or acts of violence.

## A SECURE WORKPLACE

As a company, we work to provide a safe and secure workplace to our employees. We do not tolerate any threat, direct or implied or physical conduct by any person that results in harm to people or property. We also do not tolerate conduct that harasses, disrupts, or interferes with another person's work performance or that creates an intimidating, offensive, or hostile environment.







## SPEAKING ON BEHALF OF OUR COMPANY

Everything we communicate about our company can have an impact on our reputation, coworkers, and brand. We make sure the information we communicate is reliable, consistent, and accurate, which is why only certain people are authorized to speak on our company's behalf.

### COMMUNICATE RESPONSIBLY

It's easy for communications about our company to be misunderstood. That's why it's important that you refrain from speaking on our company's behalf unless you're authorized to do so. If you ever are contacted by the media about our company, refer them to GM Communications. The same applies to requests to participate in speaking engagements or to publish articles on behalf of our company. By following our policies, we avoid sending confusing messages or sharing inaccurate information about our company.

We comply with laws that ensure the rights of employees to speak publicly about matters of public concern and engage in concerted activities related to the terms and conditions of employment. Nothing in our Code or our policies is intended or should be construed to interfere with or limit your legal rights.

### SOCIAL MEDIA

Social media offers a great way to build relationships and exchange ideas. While we respect your right to use social media, use it in a way that's consistent with our values and policies. Follow the law and be aware that you are responsible for what you publish, so use good judgment. Understand that we never tolerate the use of social media to intimidate, harass, or discriminate against fellow employees.

Honesty is important. Be transparent and disclose your relationship to GM. If you have any questions about your responsibilities relating to the use of social media please contact [socialmedia@gm.com](mailto:socialmedia@gm.com).



### WHICH WAY?

**Q** – I was reading an article online that contained inaccurate information about one of our products. Can I respond in the comment section to correct this misinformation?

**A** – No. While your intentions are good, only authorized individuals may speak for our company. Instead, notify your supervisor or a member of the GM Communications team about the article so that appropriate steps can be taken to respond.

Be careful about what you publish.  
If you would not communicate it  
at work, then don't share it online.



**NAVIGATE OUR POLICIES**  
[GM Social Media Policy](#)





## WAIVERS OF THE CODE

Waivers of the Code for directors and executive officers may be made only by the Board of Directors or the Audit Committee of the Board and must be promptly disclosed as required by law and regulation.

## NOT AN EMPLOYMENT CONTRACT

The Code does not alter the terms or conditions of your employment with GM. It does not constitute an employment contract or an assurance of continued employment.

## NO RIGHTS CREATED

This Code is a statement of the fundamental principles that govern the conduct of the company's business. It is not intended to and does not create any obligations to or rights in any employee, client, supplier, competitor, shareholder, or any other person or entity.







# CLOSING THOUGHTS

Thank you for taking the time to read our Code of Conduct, *Winning with Integrity*, and for committing to help preserve our reputation and honor our values.

In your work, you may face difficult decisions. When that happens, use the resources provided in our Code and our policies to guide you in making the right choice. Also, if you ever suspect behavior that fails to meet our standards, report it. We will not tolerate retaliation.

Our actions shape our company and its future. Take our Code to heart and embody our commitment to safety and winning with integrity.



# POLICY LINKS

Below are links to detailed policies referenced in the Code. Note that this is not an exhaustive list of policies.

[Acceptable Use Guide to Protecting GM Information and Resources](#)

[Competition Law Policy](#)

[Conflicts of Interest Policy](#)

[Cybersecurity Policy](#)

[Due Diligence Protocol](#)

[Export Compliance Policy](#)

[Global Environmental Policy](#)

[Global Integrity Policy](#)

[Global Privacy Policy](#)

[Global Substance of Concern Policy](#)

[GM’s FCPA Accounting Standards](#)

[GM Anti-harassment Policy](#)

[GM Corporate Political Contributions – U.S. Only](#)

[GM Lobbying Policy – U.S. Only](#)

[GM Social Media Policy](#)

[GM Speak Up Policy \(Non-Retaliation\)](#)

[Information LifeCycle Management \(ILM\) Policy](#)

[Information Security Policy](#)

[Insider Trading Policy](#)

[Intellectual Property: Trademarks, Patents, and Technical Information](#)

[Litigation Holds Policy](#)

[Privacy Principles](#)

[SEC Rule 10b5-1 Trading Plan Policy](#)

[User Information Security Policy](#)



# HELPFUL RESOURCES

Resource:	For help with:	Contact:
Global Ethics and Compliance Center	Concerns or questions about suspected violations of the Code, law, or our policies.	<a href="https://gmweb.gm.com/legal/Legal/Pages/GECC.aspx">https://gmweb.gm.com/legal/Legal/Pages/GECC.aspx</a>
Global Safety and Industrial Hygiene	Concerns or questions about workplace safety.	<a href="https://gmweb.gm.com/manufacturing/mfg_ghs/Pages/Default.aspx">https://gmweb.gm.com/manufacturing/mfg_ghs/Pages/Default.aspx</a>
GM Communications	Concerns or questions about media request and communications issues.	<a href="http://communicator.gm.com/comm/global/comm_site/index.html">http://communicator.gm.com/comm/global/comm_site/index.html</a>
GM Office of Export Compliance	Concerns or questions about trade compliance matters.	<a href="https://gmweb.gm.com/legal/Legal/Pages/OEC.aspx">https://gmweb.gm.com/legal/Legal/Pages/OEC.aspx</a>
Legal Staff	Concerns or questions about suspected violations of the Code, law, or our policies.	<a href="https://gmweb.gm.com/legal/Legal/Pages/HomePage.aspx">https://gmweb.gm.com/legal/Legal/Pages/HomePage.aspx</a>
Public Policy	Concerns or questions about government affairs.	<a href="https://gmweb.gm.com/PUBLICPOLICY/GPPGR/Pages/Home.aspx">https://gmweb.gm.com/PUBLICPOLICY/GPPGR/Pages/Home.aspx</a>
Human Resources	Concerns or questions about HR issues.	Contact your local HR Business Partner
Other resources:	For help with:	Contact:
Awareline	Concerns about suspected violations of the Code, law, or our policies.	<a href="https://gmweb.gm.com/HR/Security/Pages/Awareline.aspx">https://gmweb.gm.com/HR/Security/Pages/Awareline.aspx</a>
European Awareline	Concerns about suspected violations of the Code, law, or our policies (for employees in Europe).	<a href="https://gmweb.gm.com/HR/Security/CountryRegion/Pages/EuroAware.aspx">https://gmweb.gm.com/HR/Security/CountryRegion/Pages/EuroAware.aspx</a>
Independent Monitor Hotline	Concerns about violations of the law that have not been reported to the appropriate federal, state, or municipal agency.	<a href="https://socrates.gm.com/programs/monitor/global/en/gm/index.html">https://socrates.gm.com/programs/monitor/global/en/gm/index.html</a>
Speak Up for Safety	Concerns about safety issues or suggestions about how we can improve safety.	<a href="http://communicator.gm.com/sites/speakupforsafety/">http://communicator.gm.com/sites/speakupforsafety/</a>
European Speak Up for Safety Program	Concerns about safety issues or suggestions about how we can improve safety (for employees in Europe).	<a href="http://www.eu.speakupforsafety.gm.com">www.eu.speakupforsafety.gm.com</a>