



General Motors of Canada Company

Modern Slavery Report 2023

Introduction

This Report (**Report**) is made pursuant to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* by General Motors of Canada Company (**GM Canada, we, us, our**) in respect of the actions taken to prevent and reduce the risk of forced labour and child labour risks for the year ended 31 December 2023 (**Reporting Period**).

GM Canada recognizes the collective efforts of governments, civil society organisations, companies and consumers to eradicate forced labour and child labour. As part of a global company operating in the automotive manufacturing and sales industry, we have a role to play in these efforts and we are pleased to provide insight into the actions we have taken to prevent and reduce risks of forced labour and child labour in our operations and supply chain.

GM's commitment to prevent and reduce the risk of forced labour and child labour predated this report and is continually evaluated for improvements. Therefore, certain initiatives and policies described in this report were implemented before the Reporting Period but continued through the Reported Period and thereafter.

Our Structure, Activity, and Supply Chains

GM Canada is a company continued under the laws of Nova Scotia with its headquarters in Oshawa, Ontario. GM Canada is an indirect wholly owned subsidiary of General Motors Company, a company headquartered in Detroit, Michigan. General Motors Company and its subsidiaries are referred to herein as **GM**.¹

GM Canada designs, manufactures, markets and distributes vehicles and vehicle parts. GM Canada also distributes GM-manufactured vehicles across Canada through a network of approximately 450 independently owned and operated authorized dealers. GM Canada also imports vehicles for sale in Canada through its authorized dealer network, as well as vehicle parts for its vehicle production operations in Canada.

In 2023, GM Canada operated a vehicle assembly and parts stamping facility in Oshawa, Ontario; an engine and transmission production facility in St. Catharines, Ontario; an electric vehicle assembly facility in Ingersoll, Ontario (CAMI); and four parts distribution centres (one each in Quebec, Ontario, Alberta and British Columbia).

GM Canada is also home to the Canadian Technical Centre (CTC), which develops key technologies and products. The CTC has four engineering locations across Ontario, including automotive software development and testing-focused engineering at Elevation Centres in Oshawa and Markham, and test tracks in Oshawa and Kapuskasing.

As of December 31, 2023, GM employed approximately 151,000 employees worldwide.² GM Canada had approximately 7,800 employees. Their roles included:

- Senior, middle and other management staff
- Semi-skilled and skilled trades workers
- Professionals/semi-professionals and technicians

GM Canada is not subject to reporting requirements under supply chain legislation in other jurisdictions. Certain of GM Canada's parent and sister companies are subject to reporting requirements in other jurisdictions.

¹ Please note that for the purposes of this report, the reporting entity is GM Canada. However, because GM Canada's supply chain is centralized within General Motors Company, information relating to both GM Canada and General Motors Company is provided. See "Our Supply Chain" below.

² Excludes employees of GM Financial, Cruise and DMAX Ltd. which was founded in 1999 as a joint venture and became a wholly owned subsidiary of GM in May 2022.

Our Supply Chain

Sourcing of parts for GM Canada's production and warehousing facilities is primarily centralized in GM's Global Purchasing and Supply Chain function, but GM Canada enters into contracts directly to purchase the parts. GM Canada also sources certain other goods and services directly from suppliers.

Global Supply Chain

GM vehicles are manufactured in various locations across the globe. In 2023, GM sourced from approximately 5,700 global suppliers.³ This included a wide variety of raw materials, parts and tires, supplies, transportation and other goods and services. An overview of global procurement is shown below.



Local Supply Chain

GM Canada primarily procures goods and services from the following categories of suppliers (in addition to vehicles and parts):

-  **Vehicle sales, services, marketing** - advertising/media, dealer training, signage, auto-shows, contact centres
-  **Corporate Administrative Services** - health care, security services, contact labour and travel
-  **Facilities and utilities** – including facilities and utilities goods and services
-  **Indirect product** - industrial supplies, office supplies, and building supplies

³ For 2023 reporting, includes direct material, Customer Care and Aftersales (CCA), and logistics.

⁴ For 2023 reporting, includes direct material, CCA and logistics.

⁵ Tier II spend is self-reported by suppliers.



Manufacturing Services - facilities management, chemical management, and waste management



Information Technology and Telecommunications – including hardware and software



Machinery and Equipment - constructions, dies/presses, paint/body shops, powertrain machine centres

Professional and Engineering Services - supporting product engineering and design staff and support research and development staff

With the exception of vehicles and parts, the majority of GM Canada's direct suppliers are based in Canada. Many of these suppliers provide goods that originate from other jurisdictions.

Forced Labour and Child Labour Risks in Our Operations and Supply Chains

Global Supply Chain

In 2021, GM conducted a human rights saliency assessment to identify the potential adverse impacts to people that could be caused by our company's activities and business relationships. The assessment included desktop research, reviewing industry analyses, connecting with external stakeholders and hosting a series of internal workshops with leaders from across the enterprise and our geographic footprint. During these workshops, we identified potential risks and impacts throughout our value chain, considered the severity and likelihood of each impact, and prioritized them for further review and action. Please see our [2021 Corporate Human Rights Benchmark \(CHRB\) Disclosure](#).

GM continues to advance toward our vision for an all-electric future. We remain steadfast in our commitment to responsible sourcing and are continually evaluating and evolving our policies and processes in support of this commitment. For example, GM has implemented significant processes around minerals critical to electric vehicle production—such as the 3TG Minerals tin, tungsten, tantalum, and gold, as well as cobalt and mica—that predominantly originate from Conflict Affected and High-Risk Areas (CAHRA) where there are heightened concerns that proceeds from minerals could be used to contribute to armed conflict or human rights abuses. GM is also actively addressing human rights risks related to the sourcing of natural rubber for tires. Further detail on GM's efforts to address these risks is provided in the 'Supply Chain Due Diligence' section below.

Local Supply Chain

Salient risks may also be present in our primarily local, Canada-specific supply chain, which includes a broad range of Tier 1 suppliers from various locations and industries. This supply chain encompasses sectors that may be at elevated risk for forced labour or child labour at including office cleaning, food service, security and transport services.

Assessing and Addressing Risks Associated with Forced Labour and Child Labour

As described in the United Nations Guiding Principles on Business and Human Rights (UNGPs), governments have a responsibility to protect the human rights of their people, and businesses such as ours have a responsibility to respect the human rights of people. This responsibility includes recognizing and addressing potential and actual adverse impacts a business may have on people throughout its enterprise, and taking steps to prevent, mitigate and, where appropriate, use leverage to remedy those impacts.

A summary of the approach that GM has adopted to manage forced labour and child labour risk in its global supply chain are as follows.

GM's Commitment



ESG Governance and Oversight

The GM Board of Directors provides regular oversight of human rights-related issues, such as workplace safety, human capital management and supply chain related matters. As noted in the Board's Governance and Corporate Responsibility Committee's (GCRC) charter, the GCRC annually reviews GM's human rights practices, including responsible sourcing practices within the Company's supply chain.

Operationally, within GM's Global Purchasing and Supply Chain (GPSC) function, GM's Ethical Sourcing team implements policies and practices needed to effectively manage the salient human rights issues found within our supply base. This team monitors and investigates emerging issues and continually evaluates supplier compliance with GM's Supplier Code of Conduct.



United Nations Global Compact

GM is a member of the United Nations Global Compact (UNGC), which endorses a framework of principles in the areas of human rights, labour, the environment, and anti-corruption. GM is committed to these principles and is actively implementing them. For more information, please visit GM's [UNGC webpage](#).

GM's Policies and Procedures



Sustainability Commitment

GM is committed to publicly reporting on sustainability-related topics annually, discussing the opportunities and challenges it encounters working to enhance performance and conduct business responsibly. The Sustainability Report provides an overview of some of GM's long-term goals and aspirations, and efforts in support of them, and offers detail on GM's strategies in areas such as diversity, equity and inclusion, human rights and ethical business practices. To learn more about our sustainability journey, see our [Sustainability Report](#).



Human Rights Policy

GM's updated Human Rights Policy was published in December 2022. The policy communicates GM's commitment to respect all internationally recognized human rights, including those described in the Universal Declaration of Human Rights, the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and the International Labour Organization (ILO) Core Conventions and to use the UNGPs as the primary framework for our human rights program. As stated in the policy, GM "recognize(s) and respect(s) the rights of vulnerable groups around the world,

such as indigenous peoples, children, and migrant workers. We expect our suppliers to be similarly committed to protecting the rights of vulnerable groups.”



Code of Conduct

[GM's Code of Conduct—Winning with Integrity](#)—is a foundational document that states our values as a company and reinforces our commitment to a work environment founded on mutual respect, trust and accountability. The Code outlines the policies that guide our business conduct and includes employee guidance on various reporting mechanisms available to report safety and other concerns. To ensure the effectiveness of our Code of Conduct, we regularly conduct independent third-party assessments of GM's compliance program. We also conduct compliance risk assessments.



Non-Retaliation Policy

Speak Up!, GM's Non-Retaliation Policy, is intended to protect 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.

GM's primary grievance mechanism, the Awareline, is operated by an independent third party and allows employees, suppliers, and others to report concerns of misconduct by the company and its suppliers, and their respective management, supervisors, employees or agents. For more information on Awareline, please see our Remediation section.



Training for Employees

Training is a critical aspect of reinforcing our ethical culture because it educates our employees on how to apply the standards and principles set forth in our policies in their work activities. Every year, all eligible salaried employees are required to review the Code of Conduct and complete Corporate Required Training (CRT) which includes the module on Human Rights topics. New or refreshed courses are deployed annually, often with new content, new scenarios and exercises. We use adaptive technology that tailors the courses to an individual's job responsibilities.

CRT in 2023 included:

- GM Code of Conduct: Winning with Integrity
- Cybersecurity
- Litigation Hold and ILM Compliance
- Data Privacy

Once employees complete the Code of Conduct training, they are required to certify that they agree to comply with the policies contained in the Code; that they have disclosed any new potential conflicts of interest; and that they have reported any violations of the Code and any vehicle or workplace safety issues. In 2023, GM achieved a 100% completion rate among eligible salaried employees for our CRT.



Global Ethics and Compliance Center

The Global Ethics and Compliance Center (GECC) helps prevent, detect and correct violations of law and corporate policies and helps promote the ethical business culture for GM and its affiliates and subsidiaries. The GECC seeks to align GM's ethics and compliance program with the recognized elements of an effective compliance program and primarily manages GM's Code of Conduct; Non-Retaliation Policy; conflict of interest disclosure process; investigations; ethics and compliance training and communications; global policy development; compliance assurance; risk-based third-party due

diligence; whistleblower line; anti-corruption compliance assurance in strategic transactions; and other anti-corruption risk areas.

In 2023, for the fourth year in a row, General Motors was also the only original equipment manufacturer automaker recognized as one of the World's Most Ethical Companies® by Ethisphere, a global leader in defining and advancing the standards of ethical business practices.

In Our Supply Chain

GM's and GM Canada's supply chain have significant overlap. GM as a supplier of finished vehicles to GM Canada, has affirmed its commitment to compliance throughout the supply chain. GM engages frequently with suppliers, and though the supply chain is complex, works 'constantly to promote transparency and compliance with the law, the Supplier Code of Conduct, and applicable contracts.'



Supplier Code of Conduct

GM's [Supplier Code of Conduct](#) prohibits the use of child labour, forced labour, and all forms of modern slavery. The Supplier Code of Conduct also states that suppliers and business partners we contract with will not harass or discriminate against employees, nor tolerate corrupt business practices. We expect third parties, including suppliers, to act in a manner that is consistent with the principles and values outlined in our GM Supplier Code of Conduct when conducting business with, and on behalf of, GM. Suppliers are expected to cascade similar expectations through their own supply chains. In 2022, we updated our Supplier Code of Conduct to emphasize our expectation that all suppliers share in our commitments to respect human rights.



Supplier Contracts

GM expects its suppliers to be similarly committed to ethical conduct and to be fair, humane and lawful employers, as well as to enforce similar requirements with their sub-suppliers. These expectations are outlined in GM's standard purchase contract terms and conditions, which reinforce GM's commitment to reducing the risk of child labour, abusive treatment of employees and corrupt business practices in the supply of goods and services to GM.

Compliance with IATF 16949 Quality Standards is a requirement for GM Tier 1 suppliers. This third-party certification requires suppliers to employ responsible supply chain practices and to have policies on employee code of conduct, antibribery and ethics escalation. Suppliers' IATF 16949 certification status is part of GM's Sourceability Report, which is a compilation of metrics used to make informed sourcing decisions and support supplier engagement. Ratings related to responsible materials and conflict minerals are also integrated into a supplier's score in our Sourceability Report.

When GM or GM Canada become aware of violations or alleged violations of our Supplier Code of Conduct, we respond swiftly and appropriately, up to and including the termination of business relationships.



Annual Verification Surveys

GM conducts annual supplier self-verification surveys to validate adherence to GM's Code of Conduct, Terms and Conditions and Supplier Code of Conduct. In 2023, we received responses from 4,693 suppliers spanning production, logistics, customer care and after sales support.

Suppliers are asked to confirm via the survey that they have:

- Engaged in company business practices consistent with GM's Supplier Code of Conduct or a similar code of conduct published by their company.
- Adopted their own code of conduct or similar document expressing a commitment to conducting business ethically, honestly and in compliance with all applicable laws.
- Shared GM's Supplier Code of Conduct or a similar code of conduct published by their company with their suppliers.
- Implemented a safety policy that is consistent with the principles set forth in GM's Supplier Code of Conduct.

Supplier responses to the survey are reviewed and, if required, are escalated to remediate risk and noncompliance.

Supply Chain Due Diligence



Many of the advanced technologies in our portfolio may use minerals and materials that are potentially mined in Conflict-Affected and High-Risk Areas (CAHRAs). To identify and mitigate human rights risk in sourcing of these raw materials, due diligence is undertaken in connection with GM's Responsible Materials Program and GM's Conflict Mineral Program aligned with the [OECD](#) Due Diligence Guidance for Responsible Supply Chains from CAHRAs. GM's activities related to mitigation include:

- Using the Conflict Minerals Reporting Template (CMRT) to survey Tier I suppliers with products containing 3TG that were shipped to GM. In 2023, GM surveyed suppliers to gain visibility in the smelters or refiners (SORs) in our supply chain. GM also surveyed 2,454 3TG supplier locations for GM's Conflict Minerals Program in 2023 and received responses from 97% of those supplier locations.
- We are active in the Responsible Minerals Initiative (RMI) that validates that SORs pass the Responsible Minerals Assurance Process (RMAP) through a risk-based approach of processes for responsible mineral procurement. In 2023, we sent communications to 42 3TG and 14 cobalt smelters, refiners, or processors.
- Participating within the RMI and its working subgroups, including the Smelter Engagement Team, a subgroup that enables GM to have direct SOR engagement. GM also has participated in RMI-sponsored SOR RMAP pre-audit visits.
- Joining the Initiative for Responsible Mining Assurance (IRMA), a third-party certification of industrial mine sites, and RCS Global Better Mining Initiative for small and artisanal mines.
- Founding Member of the Global Platform for Sustainable Natural Rubber (GPSNR), an international, multistakeholder organization with a mission to lead improvements in the socioeconomic and environmental performance of the natural rubber value chain. GM actively participates in two GPSNR working groups alongside civil society organizations, tire makers, natural rubber processors, and smallholder farmers.

Through GM's membership in RMI, GM is also working directly and actively in cobalt and mica subgroups focusing on the following areas:

- Annually request a subset of Tier I direct vehicle component suppliers to complete the corresponding reporting templates for cobalt, mica and conflict minerals, including tin, tungsten, tantalum and gold (3TG). These templates include the Extended Minerals Reporting Template (EMRT) and the CMRT.
- Identifying and assisting with the disposition of cobalt and mica SORs and adding them to the RMI's database.

- Performing outreach to SORs that we are aware are not conforming to the RMI industry standards to encourage them to go through the RMI assurance program.



Training for Suppliers

Supplier training is an integral component to efforts to eradicate slavery and human trafficking from the supply chain. GM, through the Automotive Industry Action Group (AIAG) and Responsible Business Alliance (RBA), provides training to its suppliers regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other participating AIAG and RBA company members, all of which contribute to developing the content of the training. Training participants review the areas of child labour, forced labour, freedom of association, harassment and discrimination, health and safety, wages and benefits and working hours. The training is provided to suppliers in high-risk areas at no cost to the supplier. In addition, GM provides training to its employees in the supply chain and supplier quality functions who are responsible for physically attending supply chain facilities.

GM SupplyPower is an internet portal used by GM to share information, including sustainability event information, policies, guidelines, training, standards and reports, and best practices with suppliers. It includes a section devoted to sustainability. GM encourages suppliers to facilitate discussions with their organizations on important information posted in SupplyPower.

Remediation

As described in GM's Human Rights Policy, and in alignment with the UN Guiding Principles, when GM or GM Canada discover potential adverse human rights impacts, we investigate, and where appropriate, engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their remediation through legitimate processes. Similarly, suppliers are expected to have processes in place to prevent, mitigate and remediate adverse human rights impacts that they may cause or to which they may contribute, and to cascade that expectation through their own supply chains pursuant to our Supplier Code of Conduct.

GM has a robust process for reporting incidents involving possible wrongdoing, including concerns related to human rights. The primary grievance mechanism, the [Awareline](#), is operated by an independent third party and allows employees, suppliers and others to report concerns of misconduct by the company, its management, supervisors, employees or agents. Reports can be made in more than a dozen languages, 24 hours per day, 7 days per week, by phone, web or email. Reports may be made anonymously, where permitted by law. The Awareline is intended to be accessible to all external individuals and communities and can also be used by our suppliers' stakeholders or any external individual to raise complaints against our suppliers.

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. High-priority cases receive special scrutiny and review; a cross-functional committee meets monthly to discuss their investigative progress and resolution. There is also a quarterly review process to determine which cases, if any, require reporting to the Board or Audit Committee, as well as processes in case a particular allegation requires more immediate reporting. The Chief Compliance Officer also provides regular updates to the Audit Committee on key GM Global Ethics and Compliance Center priorities and accomplishments and trends in Awareline submissions and investigations.

In 2023, GM received 6,523 reports to the Awareline; 4,635 were classified as allegations, with the remaining classified as suggestions, inquiries and other issues. GM tracks all reports of misconduct, whether through Awareline or another channel, in a case management system that allows GM to preserve a reporter's anonymity while facilitating efficient investigation, follow-up and compliance trend analysis.

Additionally, in 2022, GM joined the RBA organization, which will allow us to further our mechanisms of remedy. RBA incorporates a global worker voice platform into their program which includes a worker surveying tool, audit support, and grievance reporting.

Assessing the Effectiveness of Our Actions

GM utilizes EcoVadis to assess the ethical and sustainable performance of our suppliers. EcoVadis is one of the world's largest and most trusted providers of business sustainability ratings that has evaluated over 100,000 companies through comprehensive questionnaires and data collection. The EcoVadis assessment includes evaluation of a company's policies and practices related to various human rights-related issues, including working conditions, child labour, forced labour, human trafficking, diversity, discrimination, harassment and health and safety.

GM asks that suppliers participate in the EcoVadis platform in connection with their request for quotes. In 2023, 1,334 GM suppliers participated, including 187 Strategic Supplier Engagement (SSE) suppliers and with a 48% increase year-over-year.

In 2022, GM refined and validated our potentially salient human rights impacts with internal and external stakeholders. In parallel with developing action plans, GM built out management systems to enhance understanding, ownership and accountability over salient issues. In 2023, GM initiated and built out a supplier audit program to further due diligence and ability to provide assurance that policies are followed. While we recognize that nearly all the potential impacts identified are by nature systemic and not limited to GM, GM Canada or even the automotive industry, we take seriously our responsibility to work to identify, prevent, mitigate and remediate potential human rights impacts to which GM or GM Canada may contribute. For more information regarding GM's approach to human rights, please see our [2021 Corporate Human Rights Benchmark \(CHRB\) Disclosure](#).

Approval and Attestation

GM Canada's Board of Directors have approved this report.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Full name: Shane Peever

Title: Director, Vehicle Sales, Service and Marketing

Date: May 23, 2024



I have the authority to bind GM Canada