



Speak Up

Our Code of Conduct: Winning With Integrity





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Code at a Glance

Our Code of Conduct provides principles, expectations, and resources to help us do the right thing, even when it's hard.



- We comply with all applicable laws, our Code, and GM policies; when unsure, we seek guidance from people leaders, Legal Staff, Compliance, or other internal resources.
- We put safety first—identifying, reporting, and escalating vehicle and workplace safety concerns immediately.
- We never retaliate against anyone who raises a concern in good faith, and we cooperate fully and truthfully with investigations.
- We treat colleagues with dignity and respect, help maintain a harassment-free workplace, and make decisions without discrimination.
- We avoid conflicts of interest, disclose any actual or potential conflicts promptly, and follow decisions made to manage them.
- We protect GM's confidential and proprietary information, use technology responsibly, follow cybersecurity best practices, and never place GM Secret or Confidential Information into unapproved tools (including external AI).
- We safeguard personal information, follow global privacy and data-protection laws, and incorporate privacy-by-design principles in our products and services.
- We compete honestly and fairly—never exchanging competitively sensitive information with competitors or making agreements that restrict competition.
- We prohibit bribery and improper gifts, keep accurate records, and exercise integrity with government officials and entities.
- We follow export controls, sanctions, and classification rules, verify business partners, and document transactions accurately.
- We speak on GM's behalf only when authorized and uphold a safe community by not physically harming or threatening physical harm, including on social media.
- We support sustainable practices across our operations and supply chain.

Resources for questions or to report concerns include your people leader, HR, [Compliance](#), [Legal Staff](#), the [Awareline](#), [Speak Up for Safety](#), and the [Employee Safety Concern Process](#).



A Message From Our Chair and Chief Executive Officer

Team,

At General Motors, we don't just adapt to change—we drive it. We are guided by our Vision of zero crashes, zero emissions, and zero congestion. To get there, we must have unwavering integrity.

Integrity builds trust, strengthens our brand, attracts top talent, reduces risk, and earns stakeholder confidence. We compete to win, but how we win matters. Our Code of Conduct—Winning With Integrity—provides timeless, principle-based guidance so we succeed the right way, even when it's hard.

The Leadership Team and I ask you to live our Code every day. Speak up about safety and any conduct inconsistent with our Code, Values, or Behaviors. Multiple channels are available, and we do not tolerate retaliation for good-faith reports.

Thank you for doing business with integrity. Together, we're shaping GM's future.

— Mary Barra, Chair and CEO





Our Why Purpose

We pioneer the innovations that move and connect people to what matters.

Our Purpose explains why General Motors exists. It captures who we are at our best and the impact we have on people.

Our Future Vision

A world with zero crashes, zero emissions, and zero congestion.

Our Vision is a look into the future—how we see the world if we spent every day pursuing our Purpose, delivering on our Strategy, and living our Values and Behaviors. It takes us beyond our day-to-day, out of our comfort zone, and reminds us of what is possible.

Our What Strategy

Deliver exceptional products our customers love that drive increasing profitability and growth.

Valuable services

Deliver innovative physical and digital experiences.

Winning vehicles

Design, build, & sell high-value, market-leading, hardware and software defined vehicles.

Emerging businesses

Launch and scale businesses leveraging our strengths for profitable growth.

Foundational imperatives

Safety

Commit to leading safety practices.

Culture

Empower our people and increase accountability.

Quality

Deliver high quality vehicles and services.

Our Strategy defines our priorities, goals, and future roadmap. It is guided by our Purpose and Vision and realized through our Values and Behaviors.



Our How Values

Our Values are our foundational beliefs that guide us and define what we hold most important.

Customers

We put customers at the center of everything we do—and every interaction matters.

Excellence

Driven by ingenuity and innovation, we have the tenacity to win.

Relationships

Our success depends on our relationships inside and outside the company.

Truth

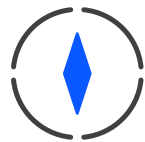
We pursue facts and respectfully challenge assumptions.





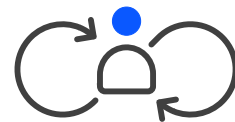
Our How Behaviors

Our Behaviors are the practices we demonstrate every day to bring our Values to life. They're how we do our work and execute our Strategy.



Win With Integrity

We do the right thing, even when it's hard. We are honest, respectful and transparent in our words and actions. We never compromise our commitment to safety.



Commit to Customers

We design products and experiences that delight our customers by understanding and anticipating their needs. We take pride in offering high quality and affordability, making their lives and our business better.



Innovate and Embrace Change

With curiosity and a willingness to do things differently, we adapt to succeed. We explore new ideas, act on new possibilities and pivot when needed. We celebrate when we get it right and learn when we don't.



Speak Fearlessly

We have the courage to respectfully challenge each other and give feedback grounded in facts—no matter the level. When we disagree, we debate openly and then move forward constructively. Candor leads to better outcomes.



Move With Urgency

We move quickly and thoughtfully to seize opportunity in a rapidly changing world. We focus on what matters most.



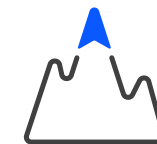
Be Inclusive

We invite diverse views and encourage open dialogue to bring our best thinking forward—because each person brings a unique perspective.



Lead as One Team

We collaborate effectively by providing context and clarity. We empower and support each other—and we succeed together.



Own the Outcome

We are accountable for our individual actions and performance, and those of our team. We tackle problems head on, take responsibility for the plan, and make hard decisions to ensure the best outcomes for the enterprise.



About Our Code

Our Code of Conduct is a statement of our shared values that helps us operate openly, honestly, and ethically. Our Code provides a framework for us to win in business with integrity. It doesn't offer an answer to every situation—but it does provide resources to make ethical decisions. Use good judgment, and always seek guidance when additional assistance is needed.

Our Responsibilities

We are responsible for our actions and our teams' performance. We count on each other to follow our Code and win with integrity. We expect our third parties to act in a way that is consistent with the principles and values of our Code when conducting business with or on behalf of GM.

Our Code applies to:

- Employees.
- People leaders, executives, and senior leaders.
- Board members.
- Subsidiaries, as applicable.

Laws in some locations may differ from our standards. We follow applicable local laws and our Code. If there is a conflict with local requirements or another policy (including those of subsidiaries or business partners), contact [Legal Staff](#).



We are all expected to:

- **Review our Code.** Consult it so you are familiar with its principles.
- **Understand the rules and applicable laws.** Know the rules and policies that apply to our work. Address issues that arise and recognize when to get advice. Contact [Legal Staff](#) for assistance with legal issues.
- **Act ethically.** Use good judgment. Comply with the law, our Code, and our policies. Honor our commitment to integrity.
- **Share questions, concerns, and ideas.** Speak fearlessly. Report suspected violations of the law, our Code, and our policies. Provide feedback and make suggestions grounded in facts.
- **Cooperate fully.** Refer allegations of misconduct to the appropriate source. If you are unsure who to contact, reach out to [Legal Staff](#). Respond promptly to any requests we receive as part of an investigation. Provide complete and accurate information.



Unique Responsibilities of People Leaders

People leaders set the tone and serve as key points of contact. They are expected to:

- Be role models—act, speak, and lead consistent with our Code, Values, and Behaviors.
- Build an ethical culture where responsibilities are understood.
- Foster a speak-up environment without fear of retaliation.
- Listen, guide sound decisions, and escalate concerns to the appropriate departments.
- [Speak up](#) and promptly report potential misconduct or violations of law, our Code, or our policies.
- Help prevent retaliation against anyone who reports a concern in good faith.
- Seek advice when ethical situations are complex or unclear.

Consequences for Noncompliance

Violating the law, our Code, or policies may result in disciplinary action, including termination, and could lead to legal or financial penalties.

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, or shareholder, or any other person or entity.

Regulatory Compliance

The work performed by GM employees plays a vital role in people's daily lives, which is why it is subject to comprehensive regulations. The Code will be administered in compliance with applicable laws and regulations (including Section 7 of the National Labor Relations Act). We must follow all applicable statutory, regulatory, and permit programs and other requirements. To fulfill these requirements, we need to know what regulations apply to us. Pay close attention to all trainings, and if you suspect a violation, [speak up](#).

Waivers

In rare circumstances, a waiver of this Code may be sought. GM's Chief Compliance Officer may grant waivers to GM team members other than executive officers. Any waiver or modification of this Code for a member of GM's Board of Directors, executive officer, or senior financial officer must be approved by the GM Board of Directors and promptly disclosed as may be required pursuant to applicable laws and regulations.



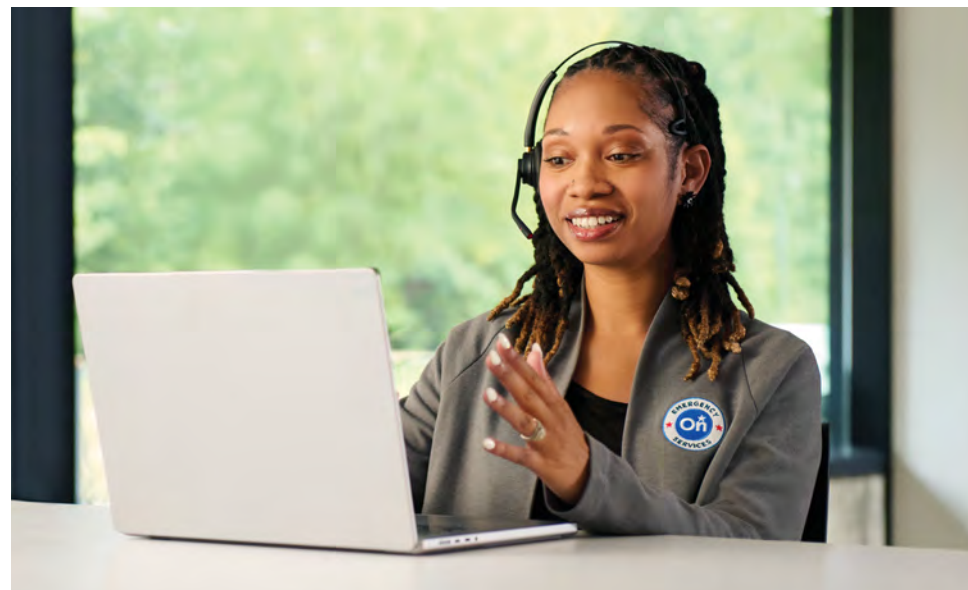
We Make Good Decisions

Our Code is here to guide us, even when the right choice isn't clear.

Stay Alert for 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 OK.”
- “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.”



Decision Tree

We should always ask these questions:

<p>Does it feel right?</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <p>YES</p> <p>Proceed</p> </div> <div style="text-align: center;"> <p>NO</p> <p>Don't do it.</p> </div> <div style="text-align: center;"> <p>NOT SURE</p> <p>Ask a people leader or other internal resource for guidance.</p> </div> </div>	<p>Is it in the best interests of our customers, our coworkers, our company, and the community?</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <p>YES</p> <p>Proceed</p> </div> <div style="text-align: center;"> <p>NO</p> <p>Don't do it.</p> </div> <div style="text-align: center;"> <p>NOT SURE</p> <p>Ask a people leader or other internal resource for guidance.</p> </div> </div>
<p>Is it consistent with our Code, our Values, our Behaviors, and our policies?</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <p>YES</p> <p>Proceed</p> </div> <div style="text-align: center;"> <p>NO</p> <p>Don't do it.</p> </div> <div style="text-align: center;"> <p>NOT SURE</p> <p>Ask a people leader or other internal resource for guidance.</p> </div> </div>	<p>Would it feel OK if made public?</p> <div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div style="text-align: center;"> <p>YES</p> <p>Proceed</p> </div> <div style="text-align: center;"> <p>NO</p> <p>Don't do it.</p> </div> <div style="text-align: center;"> <p>NOT SURE</p> <p>Ask a people leader or other internal resource for guidance.</p> </div> </div>



Ethics and Compliance at GM

The Global Ethics and Compliance Center (GECC or Compliance) helps integrate GM's commitment to conducting business ethically, honestly, and in compliance with the law and applicable regulations into GM's culture and operations by running an effective ethics and compliance program.





We Speak Up!

At GM, we speak fearlessly. We have the courage to say and do what is difficult. Take action when you see a safety issue or when you believe the law, our Code, or our policies may have been violated. Speak up!

How to Speak Up:

Tell your people leader. Share your concern with your people leader first, if possible. They should be able to provide guidance and answer questions.

Report to another internal resource. If you're uncomfortable sharing with your people leader, go to another people leader, HR, [Compliance](#), or [Legal Staff](#).

Contact the Awareline. The [Awareline](#) is another resource for reporting potential violations of our Code or raising concerns. It's operated by an independent third party and is available 24/7 from any location around the globe, and it allows you to report anonymously.

Speak Up for Safety. Report potential vehicle or product safety concerns, or suggest safety-related improvements using [Speak Up for Safety](#) (or SUFS).

Use the Employee Safety Concern Process. Report potentially unsafe workplace acts or conditions using the [Employee Safety Concern Process](#).

Investigations

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 encourage you to provide your name and contact information to better assist the investigation process.

Anonymity and Confidentiality

Although you are encouraged to identify yourself for more effective and efficient follow-up when using the [Awareline](#) or SUFS, you can report concerns anonymously where permitted by law. During the investigation, we always try to keep information confidential to the degree possible. Regardless of whether the reporter is anonymous, we take all concerns seriously and will respond appropriately.

What Happens When I Report an Issue?

After reporting you can expect that:

- Reports will be reviewed and assigned for further action or investigation.
- Any confirmed violations will result in prompt and appropriate action. Depending on the case, you may receive feedback on the investigation result. If you don't receive feedback, it doesn't mean the matter wasn't investigated or corrective action wasn't taken. To preserve confidentiality, we are not always able to share details on the outcome.

Zero Tolerance for Retaliation

We are committed to maintaining a culture where employees feel comfortable raising concerns. So, 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. We will investigate all reports of retaliation. If confirmed, we will take appropriate disciplinary action.

Navigate Our Policies

 [Speak Up! GM's Non-Retaliation Policy](#)



We Put Safety First

Our Commitment

We prioritize safety in everything we do, ensuring our vehicles and workplaces protect people. Safety is the foundation of our business and essential for earning customer trust. We act immediately to address safety concerns and foster a culture where everyone feels responsible for keeping each other safe.



How We Win With Integrity

- **Follow the law, safety procedures, our Code, and our policies.** Everyone at GM has a personal responsibility for safety.
- **Don't wait for someone else to act.** Safety issues should always be reported and addressed right away, even if doing so could delay a project. Take immediate action if you see a workplace safety concern and fix the issue if you can do so safely. If you cannot, report it to security, facilities, or your people leader.
- **Speak fearlessly.** Respectfully challenge and offer feedback constructively if someone is acting unsafely. When feedback is offered, accept it graciously.
- **Never work under the influence of drugs (including prescription drugs without medical clearance) or alcohol.** Doing so may create a safety hazard that could endanger yourself or others.
- **Report safety concerns.** Identify, report, and escalate safety and regulatory compliance issues as soon as you learn about or suspect them. Be proactive and find ways to make our vehicles and workplaces safer. Know how to recognize potential risks and report any safety concerns. You can do so confidently because we do not tolerate retaliation against those who report a concern in good faith.



We Put Safety First



Which Way?



My team is working to launch one of our existing vehicles in a new country. While the vehicle meets safety standards in neighboring markets, GM has not evaluated whether it meets the specific and unique requirements of the new country. A team member suggested launching the product to this new country under the assumption that it will pass. Can I support this plan?



No. We cannot ship the vehicle to commerce prematurely. The vehicle needs to be appropriately assessed for compliance with applicable safety and other local laws before it is launched in a new market.

Navigate Our Policies

[Global Security Policy](#)

[Global Workplace Safety Policy](#)

[Speak Up! GM's Non-Retaliation Policy](#)



We Maintain a Respectful Workplace

Our Commitment

We value every team member and treat each other with dignity and respect. By fostering an inclusive and harassment-free environment, we empower everyone to do their best work and build trust across the organization.



How We Win With Integrity

- **Treat one another with dignity and respect.** Deal with one another fairly and honestly, and create a work environment that is free from intimidation, bullying, and harassment.
- **Report inappropriate behavior.** Speak up if you see or suspect behavior inconsistent with GM's Values, Behaviors, or policies. Never retaliate against someone for making a report in good faith.
- **Make fair and objective decisions.** Never make decisions or treat someone differently based on their age, race/ethnicity, color, gender, religion, disability, veteran status, or any other characteristic protected by applicable law or GM policy.
- **Prevent harassment.** Unwelcome conduct includes slurs or threats, unwelcome touching or blocking, sexual advances or materials, and offensive slogans or symbols. It's not about what we mean or intend with our words or actions—it's about how others perceive them.



We Maintain a Respectful Workplace



Which Way?



A coworker used a slur when making a joke to me about a vendor. I'm not sure they knew it was a slur. What should I do?



Inform the coworker that their joke was not appropriate and why, if you feel comfortable doing so. If not, or if the coworker continues to use slurs or make inappropriate jokes, [speak up](#).

Navigate Our Policies



Global Policy—Workplace Environment



We Respect Human Rights



Our Commitment

We respect human rights across our operations and supply chain and expect the same from every supplier and partner. We prohibit forced labor, child labor, and human trafficking, and uphold fair work and safe conditions.



How We Win With Integrity

- **Promote safe working conditions and individual security.** Provide proper hours and compensation to all GM employees.
- **Ensure our suppliers are committed to fair labor and sustainable sourcing.** Suppliers are expected to abide by our Supplier Code of Conduct, which includes obligations designed to ensure the health and well-being of workers and communities.
- **Never use child or forced labor.** GM does not tolerate any form of forced or compulsory labor.
- **Respect workers' freedom to associate.** GM respects the right to collective bargaining.
- **Remain alert to potential human rights concerns.** If you witness or suspect a concern or a potential adverse human rights impact, [speak up](#).



We Respect Human Rights



Which Way?



I was visiting a supplier location recently and noticed that the workers looked very young. They also worked long hours without shift changes. I'm concerned that these may be signs of human rights violations. What should I do?



[Speak up](#) immediately. Our suppliers are obligated to respect human rights. If we see any concerning signs of illegal labor practices or unfair treatment, we must report it.

Navigate Our Policies



Human Rights Policy



Supplier Code of Conduct



Anti-Slavery and Human Trafficking Statement



We Prohibit Bribery and Exchange Gifts Responsibly



Our Commitment

We win with integrity by never offering or accepting bribes or improper gifts. Our actions build trust and protect our reputation, ensuring all business dealings are honest and comply with the law.



How We Win With Integrity

- **Don't offer or accept bribes.** Bribes can take many forms, like giving cash, gift cards, entertainment, or inappropriate discounts; hiring a family member or a friend of someone you seek to influence; or improper political or charitable contributions.
- **Be extra careful with government officials.** Even small gifts can break the law. Most gifts to government officials require pre-approval from [Compliance](#). Always read and follow the [Gifts, Entertainment and Anti-Corruption Policy](#).
- **Keep honest records.** Report all business transactions clearly and truthfully.
- **Do not give or accept inappropriate gifts.** These include those that create an obligation, are in the form of cash, or appear to be lavish or extravagant.
- **Never ask for gifts or favors.** Requesting a gift creates a conflict of interest.
- **Refuse any gift that doesn't comply** with the law, our Code, or our policies.
- **Do not make facilitation payments.** Small payments made to speed up a routine government task are prohibited at GM.



We Prohibit Bribery and Exchange Gifts Responsibly

Drive Your Understanding

We only accept gifts that are aligned with our general principles, or ones that are:

- Related to GM’s legitimate business goals.
- Not designed or perceived to influence 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.



For gifts to or from any nongovernment third party (like a supplier), you can refer to this summary for the level of approval that’s required:

Value	Approval Required
\$50 or less	No approval required provided it meets the general principles
Between \$50 and \$150	Written pre-approval from your people leader
\$150 or more (or a total value of \$500 or more in any calendar year)	Written pre-approval from your people leader and the Global Ethics and Compliance Center



We Prohibit Bribery and Exchange Gifts Responsibly



Which Way?



A potential government fleet sales customer asked to borrow a Corvette over a holiday weekend for vacation. Should I authorize this?



You shouldn't provide the Corvette to the government official because it may be considered a bribe. [Report](#) the issue and contact [Compliance](#). At GM, we follow the law. That's how we win with integrity.



A government official helped with an approval that stalled at his agency. Can I give him a GM discount as a thank-you?



No. We do not provide anything of value, including vehicle discounts, to a government official for his actions, even as a thank-you.

Navigate Our Policies



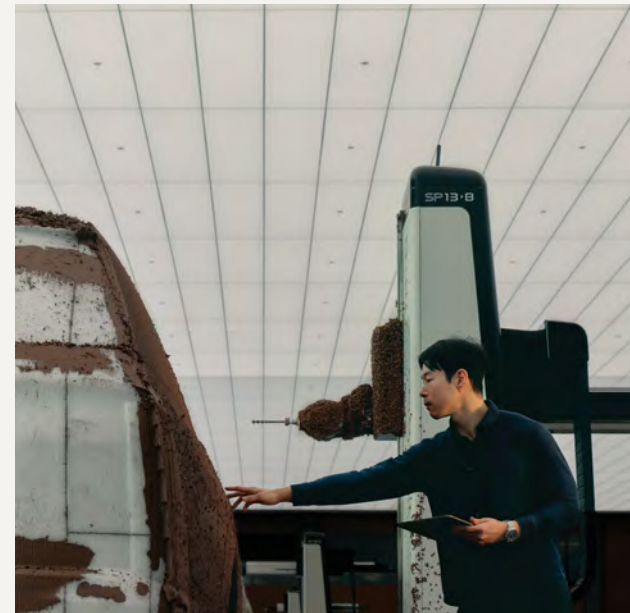
Gifts, Entertainment and Anti-Corruption Policy



We Conduct International Trade With Integrity

Our Commitment

We honor international trade laws by complying with export controls and sanctions. Noncompliance risks fines, lost business, and reputational harm—when unsure, stop and get guidance.



How We Win With Integrity

- **Follow our policies and applicable laws.** Understand how economic sanctions, export controls, and other applicable laws may apply to your work. Requirements may differ from project to project and country to country.
- **Do not conduct business internationally without knowing the regulations.** Before shipping across borders, engaging in business with new partners, or sharing sensitive technical information with outside parties, consider whether trade controls may apply. Reach out to your Export Control Officer or [Legal Staff](#) for guidance.
- **Verify all participants in transactions.** Conduct appropriate due diligence to confirm companies and individuals that we might do business with are not on applicable U.S. or other lists of restricted parties.
- **Review export classifications.** Government authorization may be required before we can share certain sensitive hardware, software, technology, or services internationally or even with certain parties within a single country.
- **Document transactions completely and accurately.** Comply with all limits on who can have access to controlled information.



We Conduct International Trade With Integrity

Drive Your Understanding

Exports can include:

- Physical shipments of goods to other countries.
- Transfers of software, data, and technological know-how.

Exports can even occur through email, other electronic means, training, or sharing technical documents or math data. Some countries consider sharing technical information with a foreign national to be an export, even if no one leaves their home country.



Which Way?



I work at a non-U.S. GM location. Do U.S. export control and economic sanctions laws apply to my work?



Yes. GM is a U.S.-based company and must adhere to the U.S. export and sanctions laws that apply to our business worldwide.

Navigate Our Policies

[Customs Policy](#)

[Export Compliance Policy](#)

[Hand Carry Policy](#)



We Compete Honestly and Fairly

Our Commitment

We compete fairly and honestly, relying on the strength of our products and innovations. We never seek unfair advantage and always comply with competition laws.



How We Win With Integrity

- **Be careful whenever speaking with competitors.** Don't discuss sensitive topics such as prices, costs, contract terms, detailed compensation or benefits information, or marketing plans with competitors, even casually. If you believe there is a legitimate business need to discuss any of these topics, such as to ensure the proper functioning of a collaboration or joint venture, you must get [Legal Staff](#) approval.
- **Never make agreements that may create an unlawful advantage in the market.** Never agree with competitors to set or elevate any aspect of price, divide customers or territories, fix wages or benefits, not compete on certain features or technical capabilities, or prevent competitors from entering the market.
- **Know and comply with our policies and all applicable laws.** Almost every country we compete in has some form of antitrust or competition law that is vigorously enforced by local regulators.
- **Seek guidance.** Ask for help if you're ever unclear about the laws and regulations. Before interacting with a competitor, including for benchmarking exercises or other collaborations, get [Legal Staff](#) and business approval.
- **Leave a conversation if it becomes unethical.** Make sure the other party knows you are not comfortable with the topic of conversation and notify [Legal Staff](#) immediately.



We Compete Honestly and Fairly



Which Way?



I am attending an automotive trade association convention with other OEM competitors. During a meeting, an employee of another OEM requests that all members of the trade association agree to stop competing on the range of EV batteries because the competition to increase ranges is driving up costs. What should I do?



We cannot agree not to compete with our competitors on price, quality, innovations, features, or technical capabilities. You should immediately tell those at the meeting that you will not participate in any such agreement, leave the meeting, and notify [Legal Staff](#).

Navigate Our Policies

 [Competition Law Policy](#)



We Follow the Rules When Working With the Government



Our Commitment

We build transparent and honest relationships with government agencies, strictly following all laws and ethical standards in our interactions.



How We Win With Integrity

- **Understand and follow the rules for your work.** These may include rules for procurement or lobbying, additional cybersecurity or accounting requirements, and other ongoing GM compliance commitments.
- **Communicate truthfully and transparently.** Submit complete, timely, and accurate information.
- **Be careful with gifts.** Do not offer or give anything of value to a government official unless it complies with applicable laws and our Code. Make sure to obtain written pre-approval if required by the [Gifts, Entertainment and Anti-Corruption Policy](#). Special restrictions can apply to gifts involving government contractors, so check with [Compliance](#).





We Follow the Rules When Working With the Government

Drive Your Understanding

In case of a **government investigation or audit:**

- 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?



GM is preparing to submit a competitive bid to a government procurement office. The procurement officer accidentally copies you on an email discussing the strengths and weaknesses of our competitor’s product. You know that it is not fair to use this information to help GM win, but you don’t want to get the procurement officer in trouble for this mistake. Can you just delete the email and ignore it?



No, you need to report this to [Legal Staff](#) immediately. Do not forward the email or share the information. If we don’t take the right steps to contain the release of this information, GM might be kicked out of the competition—even if we did not use the information to our advantage.

Navigate Our Policies

[Gifts, Entertainment and Anti-Corruption Policy](#)

[GM Lobbying Policy](#)

[Political Contributions and Expenditures Policy](#)



We Work With Third Parties Who Commit to Integrity

Our Commitment

We carefully select business partners who share our commitment to integrity, safety, and compliance. Our reputation depends on working with third parties who follow the law and our Supplier Code of Conduct.



How We Win With Integrity

- **Select third parties using due diligence.** Evaluate them based on relevant sourcing criteria.
- **Treat third parties fairly and with integrity.** Treat third parties with respect and care.
- **Avoid conflicts of interest.** Only select third parties where no improper conflict exists and, if you learn about a conflict later, disclose it.
- **Avoid even the appearance of impropriety.** Never behave in a way that could raise suspicion of a conflict of interest or misconduct.
- **Protect confidential information.** Comply with contractual obligations to keep third parties' confidential information safe. Let them know that we expect the same protection of our confidential information.





We Work With Third Parties Who Commit to Integrity



Responsible Sourcing at GM

We prioritize integrity, security, and resiliency across our supply chain. Stakeholders—including customers, shareholders, regulators, suppliers, and communities—evaluate us by how we manage our supply chain and its impact.

Customers must trust that GM products are responsibly made, delivered on time, and reliable—even during crises. Responsible sourcing means ethical, transparent practices that respect human rights. We achieve this through supply chain mapping, rigorous due diligence, and embedding these principles in all procurement activities.

Which Way?



I carefully selected a new supplier for a part my team needs. On paper, this supplier is the lowest cost, but I just learned that the supplier refuses to comply with GM's quality and safety policies. Can I still use them?



No. We cannot compromise our values when selecting third parties. Safety is essential to our reputation. Even if the part is safe, we cannot work with a supplier who doesn't practice safety at all levels. Do not proceed with the contract.

Navigate Our Policies



Conflict of Interest Policy



Gifts, Entertainment and Anti-Corruption Policy



Due Diligence Protocol



Supplier Code of Conduct



We Avoid Conflicts of Interest

Our Commitment

We make impartial decisions in GM's best interests, never using our positions for personal gain. Disclosing and managing conflicts preserves trust and transparency.



How We Win With Integrity

- **Disclose any existing conflicts of interest.** Complete your Conflict of Interest Questionnaire when hired.
- **Disclose new conflicts.** Update your questionnaire with any new conflicts, or changes to existing conflicts, within 30 days.
- **Be alert.** Notice situations in which your activities or relationships could interfere with your objectivity. Even the appearance of a conflict can create a problem.
- **Step back.** Allow the decision-makers to determine the outcome of your conflict of interest.
- **Seek guidance.** If unsure whether there's a conflict, ask your people leader or [Compliance](#) for advice. Refer to the [Conflict of Interest Policy](#) for more information.



We Avoid Conflicts of Interest

Drive Your Understanding

A **conflict of interest** arises when our personal interests, activities, investments, or associations interfere with our GM job or ability to make objective decisions on behalf of GM. Even the appearance of a conflict of interest can be a serious problem.



Which Way?



My niece just got a job at one of our suppliers. I occasionally work with that supplier and her team. Do I need to disclose the relationship?



Yes. Even the appearance of a conflict of interest could damage our reputation. You should disclose the family relationship using our questionnaire right away.

Navigate Our Policies

 [Conflict of Interest Policy](#)



We Respect Our Financial Assets



Our Commitment

We protect GM’s financial assets by properly recording and reporting transactions. Accurate financial management secures our future and upholds our reputation.



How We Win With Integrity

- **Maintain accurate books and records.** Accurately reflect our business and financial situation.
- **Make reports that are clear, complete, and timely.** Ensure financial statements and disclosures are clear, complete, and accurate.
- **Know your business partners.** Only conduct business with reputable third parties who are engaged in legitimate business.
- **Use good judgment when working with customers and third parties.** Pay special attention if a transaction involves cash or is high risk.
- **Retain the records we need to support our tax, financial, and legal obligations.** Comply with GM’s records retention schedule and securely dispose of records that are no longer needed. Also, comply with any document preservation or litigation holds in place.
- **Never dispose of any information that may be relevant to an investigation** or subject to a litigation hold.
- **Report suspicious activity.** Watch for unlawful activity like fraud, bribery, and money laundering. Report signs of it to [Legal Staff](#) or through the [Awareline](#).



We Respect Our Financial Assets

Proceed With Caution!

Money laundering hides criminal or terrorist funds in legitimate business activity. GM is committed to complying with applicable anti-money laundering laws—we verify counterparties’ identities, scrutinize cash transactions, work only with reputable third parties, and report suspicious activity to [Legal Staff](#).



Which Way?



A coworker asked me to change some information on an invoice without any justification. I never received any documentation to support the changes. Should I make them?



No. You must record transactions ethically and honestly. Ask the coworker to provide the supporting documentation. If they do not provide it, contact your people leader or [speak up](#).

Navigate Our Policies

[Business Continuity Planning Policy](#)

[GM's FCPA Accounting Standards](#)

[Litigation Holds Policy](#)

[Purchase Order for Every Invoice Policy](#)

[Travel and Expense Reporting Policy](#)



We Protect Our Information Assets

Our Commitment

We safeguard GM's information assets, including confidential and proprietary data, from loss and misuse. Responsible use and strong cybersecurity protect our company and customers.



How We Win With Integrity

Information Technology

- **Use technology responsibly.** Use technology in accordance with our policies. Never access, store, or transmit anything that's intimidating, obscene, or discriminatory.
- **Keep devices and accounts safe.** Follow GM guidelines for accessing devices and accounts, never share your credentials with others, and do not enter credentials into unknown prompts. Lock your workstation when stepping away. Install updates when prompted and do not modify or disable security protection tools.

Cybersecurity

- **Cybersecurity should be considered in all phases of development.** Think about security by design in your process. Consult our internal experts for advice.
- **Focus on our customers and their data.** Keep vehicle control systems and personal information safe and secure.
- **Only install approved software.** Install updates in a timely manner. These measures help us reduce vulnerabilities.



We Protect Our Information Assets

How We Win With Integrity (continued)

Confidential Information

- **Only access the information you need to do your job.** Only share information with those who need to know. Avoid discussing GM Secret or Confidential Information in public places where others can hear.
- **Never use GM Secret or Confidential Information outside of GM.** Never upload or paste GM Secret or Confidential Information in any unapproved tool (including AI platforms), and never send such information to your personal email or other accounts.
- **Be careful when sharing GM Secret or Confidential Information externally.** Whether verbally, in writing, electronically, or through any other means. Share only with authorized third parties who have a legitimate business reason to know and where the appropriate contracts have been put in place. Make sure security terms are included in their contracts, and only share using approved platforms.
- **Label GM information with the appropriate data classification.** A document must be classified according to its most sensitive content. The presence of any GM Secret Information requires that the entire dataset or document be classified as GM Secret and protected accordingly.

Intellectual Property and Proprietary Information

- **Identify, protect, and defend our intellectual property.** Promptly identify and report any suspected unauthorized disclosures or possible infringements by any third party.
- **Respect the intellectual property of others.** Never knowingly infringe the valid IP rights of third parties. Expect the same from our business partners and competitors.

Records Management

- **Identify, maintain, safeguard, and dispose of records properly.** Comply with GM's records retention schedule and securely dispose of records that are no longer needed.
- **Comply with any document preservation or litigation holds.** Never dispose of any information subject to a litigation hold.
- **Never selectively discard records that have not met their retention requirements,** or direct anyone else to do so.

Speak Up

- **Immediately report** suspected theft or abuse of confidential, proprietary, or trade-secret information.



Proceed With Caution!

Remember that anything we create, store, download, send, or receive using our systems is company property. It can be reviewed at any time, as allowed by applicable law. Reasonable personal use of our technology is permitted, but use good judgment.



We Protect Our Information Assets



Which Way?



I have been working long hours on a new project. Is it OK for me to transfer some files to a personal cloud account? That way I can work on them from my home computer.



No. They may be confidential and could be compromised if not properly handled. IT is available to support employees with necessary equipment to accommodate remote working needs.

Navigate Our Policies

Cybersecurity Policy

Acceptable Use Guide to Protecting GM Information and Resources

Artificial Intelligence Policy

Information LifeCycle Management (ILM) Policy

Intellectual Property: Trademarks, Patents, and Technical Information

GM-Issued Device Travel Policy

Litigation Holds Policy

Global Security Policy



We Safeguard Personal Information

Our Commitment

We respect the privacy of individuals and follow global privacy laws and best practices when handling personal information, earning and maintaining trust.



How We Win With Integrity

- **Collect, use, and disclose personal information responsibly.** Only do so when the appropriate notice is provided or consent is obtained.
- **Communicate our privacy practices clearly.** Offer simple and meaningful choices.
- **Incorporate privacy by design.** Use these principles in our development processes for products and services.
- **Comply with all applicable laws.** Follow the laws for privacy and data protection.
- **Implement reasonable security measures.** Protect personal information from unauthorized access or use.





We Safeguard Personal Information



Which Way?



A coworker in research is looking for focus group participants. She asked if I could share contact information for some customers. Can I share this information with her?



No, unless a [privacy impact assessment \(PIA\)](#) is completed to evaluate whether this new data usage is consistent with our customer commitments and legal requirements.

Navigate Our Policies

 [Global Privacy Policy](#)

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

 [Privacy Principles](#)



We Prevent Insider Trading



Our Commitment

We do not trade on or share material, non-public information (MNPI). Preventing insider trading protects our company and complies with the law.



How We Win With Integrity

- **Do not trade on MNPI about GM or other companies.** Avoid even the appearance of any improper trading.
- **Never share MNPI with others.** This includes “tipping” friends and family. If they trade on MNPI, you may be at fault.
- **Only trade on information that has been made public.** It must be released to the public through a press release, U.S. Securities and Exchange Commission filing, or communications through certain other public channels.
- **Limit who you share information with internally.** Only share MNPI with coworkers who need to know.
- **Avoid accidental sharing.** Take care to keep MNPI safe. Notify [Legal Staff](#) immediately if you have made or become aware of an inadvertent disclosure of MNPI.



We Prevent Insider Trading



Which Way?



A supplier told me about a big merger they are planning that has not yet been made public. I mentioned it to my friends at a party. The next week, one of them told me they had bought the supplier's stock in advance of the merger. Does this count as insider trading?



Yes. Even if you didn't tell your friend to buy the supplier's stock, you "tipped" your friend and violated insider trading laws. You shared the MNPI, and they bought securities while in possession of this information. You need to report this to [Legal Staff](#) or the [Awareline](#) right away.

Navigate Our Policies

[Insider Trading Policy](#)



We Communicate About GM Responsibly

Our Commitment

We communicate transparently and accurately, using approved spokespeople and channels to avoid misunderstandings, support our corporate reputation, and ensure we share consistent, reliable information.



How We Win With Integrity

- **Only speak on GM's behalf if authorized to do so.** If authorized, always represent our products and services fairly and accurately.
- **Ensure our marketing and advertising comply with all laws and regulations.** Do not make false or unsupported claims or infringe on others' intellectual property.
- **Refer [media inquiries](#) and [requests to publish articles](#) on behalf of the company to [GM Communications](#).**
- **Protect coworkers' rights to speak publicly about the terms and conditions of their employment.** Nothing in our Code or our policies is meant to interfere with or limit legal rights.





We Communicate About GM Responsibly

How We Win With Integrity (continued)

Social Media

- **Champion authenticity.** Avoid misleading consumer reviews, and support the brand genuinely.
- **Maintain professionalism.** Be respectful, as coworkers, customers, and the public may see your posts.
- **Share responsibly.** Public GM content is fair to share, and pre-approved content is available in Sharefluence.
- **Use internal platforms.** Don't share internal content externally unless you've received approval.
- **Never use social media to intimidate, harass, or discriminate.** Treat all coworkers, competitors, and third parties with respect online. An example of inappropriate conduct includes making knowingly false statements or posts that violate GM's anti-harassment policy.
- **Violence has no place at GM.** Never physically harm or directly or indirectly threaten others with physical harm, including at work and on social media. Promptly report any threats or concerns of violence that threaten the GM community to ensure our community remains safe.

For questions about social media, contact SocialCOE@gm.com.



Which Way?



I noticed a social media post that had inaccurate information about GM. Can I respond to the post to correct the misinformation?



No. If you see information on social media that may be incorrect or harmful to GM, you should not respond to the post. Instead, please alert GM Global Social Media Center of Expertise by emailing SocialCOE@gm.com.

Navigate Our Policies

 [Social Media Policy](#)

 [Technical Presentation/Publication Approval Policy](#)



We Care About the Environment



Our Commitment

We integrate environmental responsibility into decisions, design, and daily operations, reducing impacts and following the law to protect people, safeguard resources, and support a sustainable future.



How We Win With Integrity

- **Comply with all applicable laws**, regulations, GM policies, standards, and procedures.
- **Integrate our Global Enterprise Environmental Management System into our processes** to minimize impacts, ensure compliance, and drive continuous improvement.
- **Accurately report on environmental progress** for areas including emissions, waste management, and resource conservation.
- **Focus on environmental stewardship** through renewable energy procurement, energy conservation, waste reduction efforts, water conservation initiatives, and biodiversity promotion, while engaging communities and our workforce on environmental education.





We Care About the Environment



Which Way?



I noticed that a container is damaged and leaking materials. What should I do?



Report the damaged and leaking container immediately to your supervisor or the appropriate safety personnel. Ensure that the area is secured to prevent further contamination or harm. Prompt action and reporting will help manage the spill lawfully and minimize its environmental impact.

Navigate Our Policies

 [Global Environmental Policy](#)

 [Global Substance of Concern Policy](#)



We Use Technology Wisely

Our Commitment

We develop and deploy technology responsibly, with human oversight, testing, and safeguards that prioritize safety, security, and privacy to protect people, comply with the law, and preserve trust.



How We Win With Integrity

- **Put customers first.** Never compromise on safety, security, and privacy.
- **Follow applicable privacy policies and laws.** Never compromise the security of private or confidential information.
- **Understand the importance of cybersecurity.** It protects customers, their data, and our company. Incorporate security into design at all phases of product and service development.
- **Only use AI systems as approved.** Never use AI in a way that would violate this Code, GM policies, or the law.
- **Be careful and transparent about the use of AI.** Check all data inputs and content generated. Be transparent by disclosing that AI was used, where appropriate.
- **Information matters with AI.** If any GM information will be shared or stored with a provider of a third-party AI tool or cloud provider, the AI tool or cloud provider [must be pre-approved](#).



We Use Technology Wisely

Drive Your Understanding

Improper AI use can pose challenges and risks, including:

- Unauthorized disclosure of GM confidential or secret information.
- Privacy breaches that compromise sensitive data.
- Known or suspected security vulnerabilities that put customers, partners, or GM at risk.
- Inaccurate or misleading AI-generated content that affects decision-making or damages the brand.
- Unapproved use of GM data by third parties to develop or train AI models.
- Regulatory violations that create compliance risks.
- Bias in AI tools, impacting fairness and outcomes.

By balancing innovation with responsibility, we ensure AI strengthens our capabilities while protecting our integrity.



All AI systems used by GM or third parties must adhere to the following principles:

- **Inclusivity and Fairness**—AI must align with GM’s commitment to inclusiveness and must minimize bias.
- **Transparency**—Application owners must communicate AI usage clearly and disclose training-data sources.
- **Accountability**—Employees at all levels are responsible for ethical AI development and deployment.
- **Privacy**—In using AI, GM employees must protect GM information, including the personal information of our customers and employees, and comply with GM policies, privacy laws, and customer commitments.
- **Safety and Security**—AI must be robust, reliable, and safeguarded against threats.
- **Intellectual Property**—AI must respect IP regulations and evolving legal standards.
- **Compliance**—All employees must ensure AI use meets legal and policy requirements globally.



We Use Technology Wisely



Which Way?



Can I share GM Secret or Confidential Information on a consumer third-party AI chatbot, AI tool, or AI system?



No. GM has strict guidelines and robust processes to protect its information from improper public disclosure. Using external AI resources that have not been properly vetted and approved for the information being used could cause improper disclosure of GM Secret or Confidential Information and is strictly prohibited.

Navigate Our Policies

 [Artificial Intelligence Policy](#)



We Engage With Our Communities and the Political Process

Our Commitment

We invest in our communities through philanthropy and volunteerism and encourage responsible political participation to create a positive impact while maintaining neutrality and public trust.



How We Win With Integrity

- **Avoid conflicts of interest in volunteer work.** Remember to request permission if you are using company time or resources to volunteer.
- **Engage in political activities on your own time.** Use your own resources to further political causes, candidates, or campaigns. Do not speak on behalf of the company without approval.
- **Do not lobby on behalf of GM without approval.** Consult [GM's Global Public Policy organization](#).
- **Do not use GM supplier lists to solicit for personal charitable or political activities.** This avoids the appearance of impropriety and a potential conflict of interest.





We Engage With Our Communities and the Political Process



Which Way?



There is a political candidate who I support. Can I email my colleagues encouraging them to vote for her?




You must not use company resources like your GM email or contact lists for personal political activity.

Navigate Our Policies

 [Employee Fundraising Policy](#)

 [GM Personal Political Activity Policy](#)

 [GM Lobbying Policy](#)

 [In-Kind Charitable Donations Policy](#)



Policies

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

[Artificial Intelligence Policy](#)

[Business Continuity Planning Policy](#)

[Competition Law Policy](#)

[Conflict of Interest Policy](#)

[Customs Policy](#)

[Cybersecurity Policy](#)

[Due Diligence Protocol](#)

[Employee Fundraising Policy](#)

[Export Compliance Policy](#)

[Gifts, Entertainment and Anti-Corruption Policy](#)

[Global Corporate Events Policy](#)

[Global Environmental Policy](#)

[Global Policy—Workplace Environment](#)

[Global Privacy Policy](#)

[Global Security Policy](#)

[Global Substance of Concern Policy](#)

[Global Workplace Safety Policy](#)

[GM Corporate Political Contributions Policy](#)

[GM Lobbying Policy](#)

[GM's FCPA Accounting Standards](#)

[Hand Carry Policy](#)

[Human Rights Policy](#)

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

[In-Kind Charitable Donations Policy](#)

[Insider Trading Policy](#)

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

[Issued Device Travel Policy](#)

[Litigation Holds Policy](#)

[New Devices Policy](#)

[Political Contributions and Expenditures Policy](#)

[Privacy Principles](#)

[Purchase Order for Every Invoice Policy](#)

[Social Media Policy](#)

[Speak Up! GM's Non-Retaliation Policy](#)

[Supplier Code of Conduct](#)

[Technical Presentation/Publication Approval Policy](#)

[Travel and Expense Reporting Policy](#)



Contacts

Use the following resources for questions or concerns, or to report a suspected violation.

Violations of the Code, Law, or Our Policies

Awareline

<https://link.gm.com/awareline>

Global Ethics and Compliance Center

<https://link.gm.com/gecc>

Legal Staff

<https://link.gm.com/gm-legal>

Workplace Safety

Global Safety and Industrial Hygiene

https://link.gm.com/global_workplace_safety

Media Requests and Communications

GM Communications

<https://link.gm.com/GM-Media-Contacts>

Social Media: Contact SocialCOE@gm.com

Trade Compliance

GM Office of Export Compliance

<https://link.gm.com/oec>

Government Affairs

Public Policy

<https://generalmotors.sharepoint.com/sites/gpp>

HR Issues

Human Resources

https://link.gm.com/global_hr_policy

Contact your local HR Business Partner

Safety Concerns and Ideas

Speak Up for Safety

<https://link.gm.com/sufs-at-gm>

AI

Contact

protect@gm.com

AI at GM

https://link.gm.com/ai_at_gm

Artificial Intelligence Policy

<https://link.gm.com/ai-policy>



