

General Motors Australia Modern Slavery Statement 2020

Modern Slavery Statement 2020

Introduction

This Modern Slavery Statement (**Statement**) is made pursuant to the *Modern Slavery Act 2018* (Cth) by the following reporting entities (**GM Australia, we, us, our**) in respect of the actions taken to assess and address modern slavery risks for the year ended 31 December 2020 (**Reporting Period**):

- GM Holdings Australia Pty Ltd (ACN: 603 486 844) (GMHA)
- General Motors Holden Australia NSC Pty Ltd (ACN 603 486 933) (GMHA NSC)
- General Motors Australia Pty Ltd (ACN: 103 162 956) (GMA)
- General Motors Australia & New Zealand Pty Ltd (ACN: 006 893 232) (GMANZ)

GM Australia recognises the collective efforts of governments, civil society organisations, companies and consumers to eradicate modern slavery. 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 better understand the risks of modern slavery in our operations and supply chain.

Our structure and operations

Our parent company is General Motors Company (**GM**), a company headquartered in Detroit, Michigan, that, through its subsidiaries, designs, manufactures, markets and distributes vehicles and vehicle parts. References to GM in this Statement includes the four reporting entities comprising GM Australia. Our Australian headquarters is located in Port Melbourne, Victoria.

- GMHA is an indirect wholly owned subsidiary of GM. GMHA is wholly owned by General Motors Holdings LLC, which is wholly owned by GM.
- GMHA, in turn, wholly owns GMA and GMHA NSC. GMA wholly owns GM ANZ.
- GM ANZ sells vehicles and parts in Australia, predominantly to independently operated dealers and distributors. GMHA NSC also sells parts to independently operated dealers.
- GMHA NSC did not own or control any other entities in the Reporting Year.
- GMA is a holding company that indirectly holds non-majority interests in GM's Korean subsidiaries and 100% ownership in GMANZ.
- GMANZ's business includes complete care, parts and accessories, servicing, roadside
 assistance, and certified repair network. During 2020, GMANZ owned an entity that was
 dormant. Apart from this, it did not own or control any other entities.

During the Reporting Period, GMANZ embarked upon a new business, General Motors Special Vehicles (**GMSV**), which is designed to sell niche products locally via a network of dealers. The products that underpin the GMSV business include vehicles that will be imported into Australia in left hand drive form and then remanufactured to right hand drive. The venture adds sales, marketing and aftersales roles to GMANZ's 200-strong employee presence in Australia.

At the end of the Reporting Period, GM and its affiliated entities employed approximately 155,000 employees worldwide. As GMHA and GMA are holding companies, they did not have employees during 2020. As at December 31, 2020, GM ANZ had 248 employees. Their roles included:

- Executives
- · Senior and mid-level management staff
- Store persons
- Experts / Advisors / Specialists / Team leaders

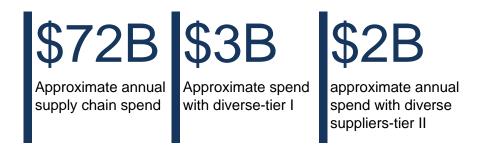
Our supply chain

Global supply chain

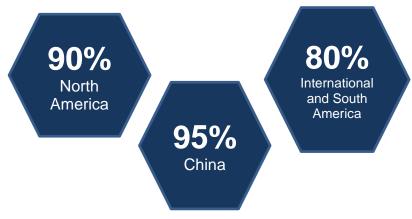
GM vehicles are manufactured in various locations across the globe. The map below shows those locations.



In 2020, GM sourced approximately 277,000 materials and services from 13,500 global suppliers. This included a wide variety of raw materials, parts and tyres, supplies, transportation and other goods and services. An overview of global procurement is shown below.



Local Sourcing as a Percentage of Regional Spend



GM Australia specific suppliers

GMHA and GMA are holding companies and generally do not contract with suppliers. GM Australia 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 – includes facilities and utilities goods and services



Indirect product - industrial supplies, office supplies, and building supplies;



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 - support product engineering and design staff and support research and development

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

Modern slavery risks in our operations and supply chains

Operational Risks

Based on the roles of GM Australia's staff, the low risk of modern slavery in Australia¹, comprehensive workplace relations laws and the policies and procedures we have in place in respect of our workforce, we consider the overall risk of modern slavery in the operations of GM Australia to be low.

Investment Risks

GMANZ indirectly holds a minority, non-controlling, interest in two entities in Indonesia. These two entities in Indonesia are the legacy entities for the business in Indonesia. They stopped their activity and are in the process of winding down.

GMA indirectly holds a minority, non-controlling, interest in two Korean GM entities that develop, manufacture and sell vehicles. One of those entities, in turn holds a majority interest in GM entities in Turkey and Germany.

We do not consider that these minority investments link GMA or GMANZ to modern slavery risk that is not otherwise described in this statement. We seek to maintain workplaces where employees are treated with dignity and respect and work of their own free will. GM maintains the same policies and procedures, described below, in all jurisdictions. Its Compliance and Audit functions are global.

Global supply chain

One of our most salient supply chain risk relates to the procurement and use of raw materials in the manufacture of GM cars and parts, which GM Australia then sells in Australia. The risks are managed by GM and have been explained in detail in GM's 2020 Sustainability Report which can be accessed at https://www.gmsustainability.com. In summary, there are modern slavery risks associated with the raw material inputs including cobalt, nickel and lithium used to manufacture car battery chemicals. Furthermore, many of the advanced technologies in vehicles- require the use of 3TG minerals (e.g., tin, tantalum, tungsten and gold) that could be mined in conflict affected and high-risk areas.

Raw material risks also include natural rubber. The tyre industry consumes around 70% of the world's natural rubber. Most of the world's rubber today comes from Southeast Asia. As demand grows, so too does pressure to convert ecologically valuable and sensitive tropical forests into more rubber plantations which, in turn, puts pressures on local communities that could threaten their fundamental human rights. In recognising the importance of taking action to limit the social and environmental impacts from natural rubber production, GM became the first automaker to commit to sustainable natural rubber in 2017, and in 2018 became a founding member of the Global Platform for Sustainable Natural Rubber.

GM has also identified modern slavery risk in its parts and components supply chain, including semiconductors. This risk is predominantly driven by the jurisdiction, or region, in which the parts are manufactured.

¹ As reported by the Global Slavery Index.

How We Enforce Our Policies and Codes of Conduct

GM employees must hold suppliers they work with accountable for acting in a manner that is consistent with our Code of Conduct, Winning with Integrity.

Our Supplier Code of Conduct and purchase contract Terms and Conditions set forth expectations for ethical social, business and environmentally responsible practices. By choosing to do business with GM our suppliers accept our purchase contract Terms and Conditions. Our Terms and Conditions clearly state our prohibition against any use of child labour or any other form of forced or involuntary labour, abusive treatment of employees or corrupt business practices in the supplying of goods and services to GM.

Furthermore, our contracts lay out expectations for lawful compliance with data protection and privacy, wages, hours and conditions of employment, subcontractor selection, antidiscrimination, and occupational health and safety. GM also expects suppliers to cascade a Code of Conduct in their own value chain.

When we become aware of violations or alleged violations to our Code of Conduct, we are committed to responding swiftly and appropriately, up to and including the termination of business relationships Suppliers must attest to compliance with our Terms and Conditions, Supplier Code of Conduct and all applicable laws and regulations. GM conducts annual verification surveys to validate adherence to these obligations, and noncompliance is addressed directly with suppliers through its Supplier Champior process. In 2019, just under 600 suppliers were included in the survey. In 2020, participation increased and survey responses were collected from over 2,800 suppliers, including all of our suppliers for production, logistics, and customer care and aftersales support. In addition, 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.

Local Supply Chain

Salient risks may also be present in our local supply chain which includes a broad range of first tier suppliers from various locations and industries, including those considered a higher risk for modern slavery because of their sector. For example, car washing and detailing, office cleaning, security and transport services are considered higher risk sectors for modern slavery. The risk profile of these sectors are increased by the utilisation of lower skilled workers who are often on temporary visas. We are also cognisant of the modern slavery risks inherent in the supply chain underpinning our corporate merchandise and the batteries charging our laptops and smartphones.

Assessing and addressing modern slavery risks

As described in the UN's Guiding Principles on Business and Human Rights, while governments have a duty to protect human rights, businesses like ours have a responsibility to respect human rights. GM has adopted policies and procedures globally, to manage the risk that its employees are not working of their own free will. GM is responsible for its supply chain risks and can best assess modern slavery risk by setting expectations at all levels of the supply chain. We want to address

potential adverse impacts to people, and this means taking steps to prevent, mitigate and, where appropriate, remediate.²

A summary of the framework that GM has adopted to manage modern slavery risk follows.

GM's Commitment



ESG Governance and Oversight

The GM Board is committed to overseeing the company's integration of ESG principles throughout the enterprise. The Board is committed to elevating GM's leadership profile and reputation among investors, policymakers and others on ESG issues and practices, and believes GM has a unique opportunity to address these important



issues.

United Nations Global Compact (UNGC) and the Sustainable Development Goals

GM recognises and seek to uphold international human rights standards. GM is a signatory to the UNGC, which calls upon companies to align their strategies and operations with universal principles on such matters such as labour, human rights,

the environment and anti-corruption. As a UNGC signatory, GM agrees to uphold the Ten Principles derived from the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption. GM's participation in the UNGC underscores our confidence that it is operating in a consistent manner around the world to ensure the proper treatment of all employees. This includes supporting the elimination of all forms of forced and compulsory labour and the effective abolition of child labour ³

GM also maps our material issues to the 17 Sustainable Development Goals and the underlying targets and identify where GM has the most opportunity for impact. During 2019, GM refreshed its materiality assessment and intend to use its findings to further refine our focus on the UNSDGs.4

GM's policies and procedures which address modern slavery risks



Sustainability Commitment

GM issued its 2020 Sustainability Report Driving Sustainable Value which notes that GM has in development social goals in areas such as human rights, diversity and inclusion in hopes to spur the same level of performance and accountability.5 As part of GM's highest-priority topics, GM sets out the following:

- i. promoting an environment that welcomes, celebrates, and values individuals of all backgrounds, providing fair and equitable outcomes for everyone;⁶
- ii. the practice of procuring raw materials in a way that respects human rights, supports local economies, preserves finite resources and protect human and environmental health;⁷ and
- iii. the upholding of ethical behaviour by direct and indirect suppliers, especially around issues such as child labour, forced or slave labour, abusive treatment or corrupt business practices.⁸

³ 2020 Sustainability Report Driving Sustainable Value, at p 16 and 142.

⁴ 2020 Sustainability Report Driving Sustainable Value, at p 16.

⁵ 2020 Sustainability Report Driving Sustainable Value, at p 7.

⁶ 2020 Sustainability Report Driving Sustainable Value, at p 18.

⁷ 2020 Sustainability Report Driving Sustainable Value, at p 20.

⁸ 2020 Sustainability Report Driving Sustainable Value, at p 20.

Human Rights Policy



GM's Human Rights Policy reinforces our values, principles, policies and practices and is guided by the UNGC. This policy also acknowledges internationally recognised human rights principles and is informed by the United Nations Guiding Principles on Business and Human Rights and its foundational principles for business enterprises, including those expressed in the International Bill of Human Rights and the International Labor Organisation's Declaration on Fundamental

Principles and Rights at Work.

As a global business, GM works to protect the rights of everyone working for and with GM. GM appreciates the contributions of every team member and seek to maintain workplaces where employees are treated with dignity and respect and which are free from harassment and unlawful discrimination.

GM has a zero-tolerance policy against the use of child labour. As stated in the policy, GM "seek[s] to avoid inadvertent adverse economic impact attributable to conflict mineral due diligence activities".9

During the second half of 2020 and beginning of 2021, GM brought together a cross-functional group to review and strengthen our human rights policy. To inform this work, GM reviewed two leading human rights policy benchmarks being the Corporate Human Rights Benchmark and the Investor Advocates for Social Justice's Shifting Gears Report. GM then examined the human rights polices of 10 peer and leading companies to better understand current practices. GM has discussed each human rights policy section that was identified in the benchmarks and eventually arrived at full consensus for each, aiming to ensure that out updated policy was, at a minimum, in line with current best practice. GM intends to publish our updated human rights policy later in 2021.¹⁰

Through this process, GM sought to activate and engage leaders from across our entire enterprise and geographic footprint. GM believes that engaging with our own people during a series of highly interactive capacity building and exploratory workshops would be an important early step as we strive to embed respect for human rights across the business. GM has examined each category of our value chain and discussed potential impacts, including starting to consider the severity and likelihood of each. GM plans to leverage the insights from our workshops to enhance our compliance efforts related to our human rights policies and practices, including with respect to our supply chain.¹¹



Code of Conduct

GM's Code of Conduct describes the standards of behaviour expected of our employees. It requires employees to comply with all applicable laws, including any applicable law prohibiting slavery and human trafficking. Salaried employees are required to certify their awareness and compliance with the Code of Conduct annually.

GM expects third parties, including suppliers, to act in a way that is consistent with the principles and values outlined in out GM Supplier Code of Conduct when conducting business with, and on behalf of, GM. GM expects employees working with our third parties to hold them accountable.¹²



Non-Retaliation Policy

GM's Global Speak Up! Non-Retaliation Policy applies to employees, supervisors, Board members, subsidiaries that GM controls or owns more than 50%. The Policy provides protection for whistleblowers who raise concerns pursuant to its terms.

⁹ 2020 Sustainability Report Driving Sustainable Value, at p 34.

¹⁰ 2020 Sustainability Report Driving Sustainable Value, at p 34.

¹¹ 2020 Sustainability Report Driving Sustainable Value, at p 35.

¹² 2020 Sustainability Report Driving Sustainable Value, at p 30.

Matters that can be raised include breaches of our Code of Conduct. The Policy also sets out a process for making reports/complaints.

Training

GM deploys extensive training as an internal tool to educate and prevent humanrights related issues from arising, and robust reporting and internal auditing mechanisms to rapidly identify and respond to issues if and when they arise.

The Corporate Required Training (CRT) emphasizes four areas:13

- i. The topics found in GM's Code of Conduct;
- Guidelines for protecting GM's informational assets;
- iii. Maintaining a respectful workplace (e.g. anti-harassment, diversity, equity and inclusion and nondiscrimination); and
- iv. Product and workplace safety.

The courses are updated annually with new content, new scenarios and exercises for further staff training. 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 2020, GM achieved a 100% completion rate among eligible salaried employees for both our CRT and Code of Conduct Certification Program.



Global Ethics and Compliance Centre (GECC)

The Global Ethics and Compliance Centre (**GECC**) is led by GM's Assistant General Counsel and Chief Compliance Officer who provides regular updates to the Audit Committee of GM's Board of Directors. The GECC prevents,

detects and helps correct violations of law and corporate policies or ethical business culture. The GECC seeks to align GM's compliance program with the recognised elements of an effective compliance program and primarily manages GM's Code of Conduct, conflict of interest disclosure process, investigations, ethics and compliance communications, global policy development, compliance training, compliance assurance, risk-based third-party due diligence, whistleblower line and anticorruption risk areas.¹⁴

Further, in 2021, for the second year in a row, GM was also the only Original Equipment Manufacturer automaker recognized by Ethisphere, a global leader in defining and advancing the standards of ethical business practices, as one of the World's Most Ethical Companies.

In our supply chain

GM's supply chain is extraordinarily complex, involving many tiers of suppliers that directly or indirectly supply raw materials, components and services from locations across the globe to GM's global facilities. This supply chain complexity frequently prevents GM from engaging with each supplier in its supply chain. Nonetheless, GM engages its direct suppliers, employees and contractors, and is deeply involved in industry-wide activities through organisations such as the Automotive Industry Action Group (AIAG), including training development, funding, and

¹³ 2020 Sustainability Report Driving Sustainable Value, at p 32.

¹⁴ 2020 Sustainability Report Driving Sustainable Value, at p 29.

identification of high-risk areas, in addition to other activities, to help eliminate slavery and human trafficking from GM's supply chain.¹⁵



Supplier Code of Conduct

GM's Supplier Code of Conduct articulates GM's expectations of the conduct of suppliers and business partners. Suppliers are expected to understand and act consistently with GM's approach to integrity, responsible sourcing, and supply chain management. GM expects that its suppliers will cascade similar expectations

through their own supply chains.

GM expects to do business with suppliers that meet our standards and behave consistent with, and positively reflect, GM's values throughout the supply chain. GM's Supplier Code of Conduct makes express reference to human rights, and prohibits forced labour, child labour, human trafficking, harassment and discrimination, and requires suppliers to comply with laws prohibiting slave and forced labour, prohibitions on employment of underage children, human trafficking and laws regulating work hours, wages and benefits.



Supplier Contracts

GM expects its suppliers to be fair, humane and lawful employers, and to enforce similar requirements from their sub-suppliers. These expectations are outlined in GM's standard purchase contract terms and conditions, which reinforce GM's zero-tolerance policy against the use of child labour, abusive treatment of employees

and corrupt business practices in the supply of goods and services to GM.¹6 GM's standard terms and conditions also require suppliers to provide written certification of their compliance with GM's requirements that prohibit the use of forced or involuntary labour, and GM periodically conducts supplier compliance surveys to confirm compliance. This certification process supports GM's efforts to verify its product supply chain and to evaluate the risk of human trafficking and slavery.



Conflict Minerals Policy

Through industry collaboration, GM has adopted a common methodology to obtain chain of custody declarations from suppliers to increase the transparency of conflict minerals in GM's global supply chain. GM has been an active contributor within the AIAG in developing an industry wide approach to reporting the use of conflict

minerals and educating suppliers about their roles and responsibilities.

GM requires its suppliers to engage in supply chain due diligence to improve understanding and reporting of component content supplied to GM. Further, GM encourages suppliers to source responsibly with validated conflict free smelters, wherever possible, to increase the level of confidence that the components in GM vehicles and products contain conflict free minerals.



Annual Verification Surveys

GM conducts annual verification surveys to validate adherence to GM's Code of Conduct, Terms and Conditions and Supplier Code of Conduct. Non-compliance is addressed directly with suppliers through its Supplier Champion process. In 2019, just under 600 suppliers were included in the survey. In 2020, participation

increased and survey responses were collected from over 2,800 suppliers, including all of GM suppliers for production, logistics and customer care.

¹⁵ Extract from: General Motors Company Anti-Slavery and Human Trafficking Statement (UK) for the period of 1 January 2020 to 31 December 2020.

¹⁶ Extract from: General Motors Company Anti-Slavery and Human Trafficking Statement (UK) for the period of 1 January 2020 to 31 December 2020.

Supply Chain Due Diligence for Specific High Risk Industries



As electrification grows in importance to GM's vehicle portfolio, so too does the focus on cobalt, which is used in lithium-ion batteries. There are common, industry-wide concerns around the use of child labour in the mining of cobalt, which would represent a violation of GM's Supplier Code of Conduct and Terms and Conditions in supplier contracts. Through GM's membership in Responsible Minerals Initiative

(RMI), GM is working directly and actively in a cobalt subgroup in the following areas:

- Utilising the Cobalt Reporting Template (**CRT**) with key suppliers. The CRT is an important tool in the identification of refiners in the cobalt supply chain.
- Identifying and assisting with the disposition of cobalt companies to determine if these companies meet RMI's industry specification for an eligible cobalt refiner.
- Performing outreach to cobalt refiners that are not conforming to the RMI industry standards
 to encourage them to go through the RMI assurance program (RMAP) for cobalt. GM
 reached out to 21 cobalt refiners for the 2020 calendar year. In addition, another 10 cobalt
 refiners are actively engaged or in communication with RMI in pursuing the third-party audit
 as part of the RMAP.
- Utilising the RMAP assessment, refiners have been identified as the choke point in the cobalt supply chain because of their limited number of actors. The RMAP assessment is used to validate that cobalt refiners have systems and processes in place to conduct due diligence in accordance with internationally recognised frameworks.
- Conducting due diligence of key GM Tier I suppliers to receive assurance from these suppliers that responsible sourcing of cobalt is a top priority for them.
- Functioning as a single point of contact on behalf of RMI for several cobalt refiners, assisting them in their pursuit to join the RMAP.

Another area of concern is the risk of child labour in mining mica. GM works collaboratively within RMI's subgroup on mica that includes other RMI member companies to proactively address concerns. The RMI subgroup is working with the Responsible Mica Initiative in the following areas:

- Identifying processors of mica in the supply chain using a Company Identification Questionnaire.
- Creating a joint due diligence standard for these processors.
- Dispositioning processors of mica using RMI methods and adding them to the RMI smelter/refiner database.

A Mica Reporting Template was recently issued by RMI for public use that is similar to other mineral reporting templates. GM sent this template to key suppliers that use mica to identify mica processors, a key step toward responsible sourcing.



Training for Suppliers and Supply Chain Governance

Direct supply chain training is an integral component to GM's efforts to eradicate slavery and human trafficking from the supply chain. GM, through AIAG, provides training to its suppliers and employees regarding human trafficking and slavery, including fundamental principles of responsible working conditions. The training reinforces the shared expectations of GM and other

participating AIAG auto 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.¹⁷

GM Supply Power is an internet portal used for sharing information and best practices with suppliers. In 2020, GM created a new page on this portal that serves as a single source of information for GM's supply chain sustainability, including GPSC's sustainability vision and goals, webinars and symposia, and other resources to help suppliers strengthen their sustainability programs.

Remediation

As articulated in the UN Guiding Principles, both governments and businesses have a responsibility to remedy adverse human rights impacts if and when they occur. GM utilizes multiple channels to identify potential adverse impacts throughout the supply base, including our grievance reporting mechanism (Awareline), monitoring of various data sources, use of the Resilinc platform, and engagements with NGOs. Potential adverse impacts are investigated on a case-by-case basis, with appropriate corrective actions and follow-ups being determined accordingly.

Assessing the effectiveness of our actions

GM adopted Ecovadis software in 2021 for the purpose of assessing ethical and sustainable performance of the global business and its third parties. Ecovadis is one of the world's largest and most trusted provider of business sustainability ratings through effective questionnaires and data collation.

Going forward, GM will use Ecovadis to assess strategic suppliers and use the results of Ecovadis data as part of our supplier assessments. GM is also in the process of incorporating Ecovadis into our procurement strategy and aims to increase the number of suppliers assessed.

Over the course of the next few years, GM plans to review salient issues to gain additional understanding of the risks and why they are salient, along with what efforts and resources (e.g. new or existing tools, partnerships, information, processes, people, capital, etc.) that may be needed to manage them. This will help inform a central piece of GM's strategy for preventing and mitigating potential impacts.

In addition to, and in parallel with, developing action plans, GM intends to focus on building out a robust governance system to enable understanding, ownership and accountability over our salient issues. This means ensuring that the right people internally are empowered to understand the issues and to work on developing and executing on action plans. It also means making sure that we have effective metrics in place to track our progress.

Finally, we see stakeholder engagement as an ongoing process. We value the relationships that we have formed with many of our stakeholders, and look forward to further opportunities to connect, learn and collaborate.¹⁸

Consultation and approval

During the reporting period this statement covers, GM Australia actively engaged and consulted with GM-in the development of this statement. Each of the Reporting Entities and their owned or controlled entities were consulted in relation to this statement. We discussed details of the Modern Slavery Act 2018's reporting requirements, information regarding the actions we intend to take to address these requirements and provided them with relevant materials and updates.

¹⁷ Extract from: General Motors Company Anti-Slavery and Human Trafficking Statement (UK) for the period of 1 January 2020 to 31 December 2020.

¹⁸ 2020 Sustainability Report Driving Sustainable Value, at p 36.

The four reporting entities have senior management and directors in common who, together with key personnel from General Motors Holdings LLC, have been kept abreast of the preparation of this Statement. This Statement was approved by the board of General Motors Holdings Australia Pty Ltd on behalf of itself and each of the reporting entities.¹⁹

Signed by:

Marc Ebolo

Managing Director

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¹⁹ The guidance issued by the Australian Border Force provides that the principal governing body of a higher entity can approve the statement on behalf of the reporting entities and a responsible member (usually a director) of the higher entity must sign the statement. A higher entity is an entity that is able to directly or indirectly influence or control each reporting entity.