

Policy #: <b>PPC-01</b>	Policy Name: <b>General Motors U.S. Corporate Political Contributions and Expenditures Policy</b>	
Effective Date: August 13, 2018	Executive in Charge: Vice President, NA Public Policy	Policy Contact: Director, Employee Advocacy

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## **I. Purpose**

General Motors Company (“GM”) is committed to being a responsible corporate citizen, to ensuring compliance with the letter and spirit of the law, and to promoting disclosure and accountability regarding political contributions and expenditures.

## **II. Applicability**

This policy supports GM’s interest in promoting public policies of concern to GM, educating public officials about our business, and facilitating employee contributions to political candidates through the General Motors Company Political Action Committee (“GM PAC”) and various GM state political action committees, while complying with all relevant laws and regulations governing political contributions or expenditures for federal, state, or local elections, including the reporting and disclosure of such amounts.

## **III. Superseded Policy**

This policy supersedes General Motors U.S. Corporate Political Contributions and Expenditures Policy published March 2, 2017.

## **IV. Compliance**

Federal law generally does not permit contributions, including in kind contributions, by corporations to candidates for federal office or national party committees, but corporations may make contributions to candidates running for state or local office in some states and may contribute to various organizations that engage in political activities. GM will comply with all applicable laws and regulations governing campaign finance, political contributions or expenditures for U.S. federal, state, local elections, and political activities, including reporting and disclosure requirements.

GM regularly consults inside and outside counsel to confirm its political expenditures and other political and lobbying activities are undertaken in compliance with applicable law and this policy.

## **V. Policy**

### **A. Policy Regarding Making Political Contributions and Expenditures**

Using the following criteria, GM PAC contributions will be guided (pursuant to governing law) by a Board of Directors appointed by the Chief Executive Officer of GM:

- a) Public integrity of the candidate
- b) Representation of a jurisdiction of importance to GM
- c) General support for issues of importance to GM
- d) Service in a leadership role

Direct corporate political contributions will be guided by the above set of criteria and must receive advance written approval from both the Vice President, NA Public Policy and the GM Executive Vice President and General Counsel (the "General Counsel"), or their designee. All GM PAC and direct corporate political contributions will be made to promote the interests of GM and without regard to the private political preferences of any employee.

GM will not make independent expenditures.

### **B. Review of Corporate Political Contributions**

The Vice President, NA Public Policy, or his designee, will review, at least annually, with the Governance and Corporate Responsibility Committee (the "GCRC") of the GM Board of Directors all corporate political contributions as well as GM PAC and various GM state political action committee contributions and expenditures and the process by which those are made.

### **C. Disclosures**

To promote transparency, GM's annual voluntary disclosure will include the following information on GM's publicly available website:

- A copy of the General Motors Policy on Corporate Political Contributions and Expenditures,
- A list of the amounts and recipients of corporate contributions to section 527 organizations,
- A list of the names and amounts of corporate contributions made to individual candidates for state or local office,
- For each U.S. organization identified as tax-exempt by the Internal Revenue Service as either a section 501(c)(6) trade association or a section 501(c)(4) social welfare organization that receives at least \$50,000 in dues or similar payments during a given year, the portion of the payments that is identified by the organization as being used for non-deductible political expenditures, and
- A link to the FEC website which details employee contributions to the federal GM PAC as well as GM PAC contributions.

GM will disclose the above information by March 1 of the year following the year in which the payments were made.

### **D. Reimbursements**

GM will not reimburse anyone for a political contribution or expenditure.

### **E. Visits to GM Facilities**

GM encourages elected officials to tour GM facilities consistent with applicable laws and policy. Candidates for public office are not permitted to use GM facilities for campaign purposes, such as the distribution of campaign literature and making of campaign speeches, unless authorized in advance by the General Counsel, or his designee, and GM Legal Staff. Visits to GM facilities by elected officials must be permitted under governing law and policy. (See GM Plant Visit Policy for further guidance.)

### **F. National Political Party Conventions**

GM has supported national party conventions and selected meetings of public officials as an opportunity to promote our products and public policy positions. At the time of the national political party conventions, GM will carefully consider its convention participation and attendant opportunities to showcase its products and to support national party committees, host city committees, or other organizations involved with the convention.

## **G. National Candidate Visits to GM Facilities**

Republican and Democratic Presidential candidates may visit no more than three GM plants at the mutual agreement of GM and the National campaign headquarters of the nominees during the election cycle. These restrictions apply not only to visits by the candidate but also to visits by the candidate's immediate family. Such a visit is also subject to the GM Plant Visit Policy.

## **H. Employee Political Participation**

GM encourages personal participation by employees in the political process, consistent with good citizenship, including exercising their right to vote. However, employees' political efforts, such as helping to elect a federal, state or local official, must be on a purely personal basis, and may not in any way imply that such activities have the concurrence or endorsement of GM. Except for participation in GM PAC and various state political action committees or other political activity directly authorized in advance by the General Counsel, or his designee, (subject to applicable laws), GM employees may not make or offer contributions, expenditures, or assistance, on behalf of GM, in connection with elections to public office. GM employees may not furnish services to any candidate or his or her staff during the employee's normal working hours or use corporate stationery, facilities or other property to support a candidate. In addition, employees should not use their positions or titles with GM in their personal efforts to elicit support on behalf of a candidate or political party. All GM employees should be alert to the possibility of actions that might be considered contrary to this policy and notify their management if they become aware of such actions.

## **I. Shared Information**

GM needs to maintain its ability to interact with a comprehensive network of thought leaders who help shape public opinion and policy about the auto industry and at the same time maintain the highest standards of integrity and the ethical conduct of business. To that end, GM may provide information to legislators, regulators and the public, in the form of testimony, advertising, communications or information releases.

## **J. Policy Administration, Interpretation and Amendments**

The Vice President, NA Public Policy, in consultation with GM Legal Staff is responsible for administering, interpreting and updating this policy as required. The Vice President, NA Public Policy, in consultation with GM Legal Staff may amend this policy and authorize variations in the procedures set forth in this policy, provided that those variations are consistent with the general purpose of this policy and applicable laws. Any such variations must be confirmed in writing.