2021 Human Rights Report
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Introduction: CEO’s Letter

Respect for human rights is vital to our business

Dear Stakeholders

Throughout our 130-year history, GE has held a larger purpose of innovating technology to lift the quality of life for people around the globe. People have counted on GE to “find out what the world needs... and try to invent it,” as our founder Thomas Edison famously said. Our employees serve customers and communities in over 175 countries and are passionate about solving the world’s most pressing sustainability challenges in energy, health, and flight.

At GE, we’re also focused on improving our impact on our people, communities, and planet. Respecting human rights around the world has long been a part of our culture of unyielding integrity and is embedded in our environmental, social, and governance priorities.

We are proud of having been one of the first global companies to issue a corporate human rights statement in 2006 and of our early alignment with the United Nations (UN) Global Compact. We appointed a dedicated Human Rights Leader more than 15 years ago who works with a cross-functional global network of colleagues to guide GE in our commitment to respect human rights in our business operations, products, and relationships with organizations around the world. And today, to further enhance transparency to our stakeholders, we are proud to issue this Report to share how we run our human rights program globally.

In 2022, we are laying the groundwork for our plans to create three independent companies focused on energy, health, and flight. With a continued commitment to human rights and sustainability at the core, these companies are leading the energy transition to drive decarbonization, developing precision healthcare that personalizes diagnoses and treatments, and creating a future of smarter and more efficient flight, which directly aligns with the UN Sustainable Development Goals (SDGs).

This is the impact of GE – every day our people rise to the challenge of building a world that works, in service of a more connected, healthier, and more sustainable future.

H. Lawrence Culp, Jr.
Chairman of the Board and Chief Executive Officer, GE
CEO, GE Aviation

“Respecting human rights around the world has long been a part of our culture of unyielding integrity and is embedded in our environmental, social, and governance priorities.
Introduction: Human Rights and Sustainability Leader Letter

We’ve been innovating to respect human rights from the beginning

GE’s Human Rights Journey
Respect for human rights has long been embedded in the way GE does business. We issued our first Human Rights Statement of Principles in 2006, during John Ruggie’s mandate as the UN Secretary-General’s Special Representative for Business and Human Rights. We also engaged closely with Professor Ruggie and his team to share our perspective on the proper scope and structure of the UN Guiding Principles on Business and Human Rights (“Guiding Principles”), which we embraced soon after they were endorsed by the UN Human Rights Council and which became the cornerstones of our program.

Since then, we have been at the forefront of the drive to integrate human rights in business. We have a rare appreciation of the challenges global companies face when embedding respect for human rights in practice.

As we work on our plan to form three new, independent companies, our steadfast commitment to integrity, lean, and respect for human rights remains embedded in our people, places and operations.

A strong sustainability and human rights program is critical to our mission. It is also professionally and personally important to our employees, communities, customers, investors, and business partners. We strive for transparency with our stakeholders to hold ourselves accountable and to drive continuous improvement.

We are thankful and grateful to our stakeholders and our former human rights and sustainability leaders for their invaluable role in helping us chart and advance the program. From GE’s inception to today, doing what is right for the communities we serve has always inspired us.

As we worked with the Business Leaders Initiative for Human Rights and met with John Ruggie and his team from the United Nations, we knew what GE could bring to the table – a well-developed set of internal measures and compliance mechanisms. For any human rights initiative to work within our Company, it had to be defined, measured, and integrated with existing compliance programs. This perspective informed our discussions with John Ruggie’s teams as they drafted the Guiding Principles on Business and Human Rights.

Mark Nordstrom
(former GE Human Rights Leader and Labor and Employment Counsel)
Bob Corcoran
(former VP, Corporate Citizenship for GE)

We appreciate the opportunity to share this Report to provide a deeper look into how we implement our human rights program to address human rights risks across our value chain. It details our core principles and how we implement them as core to our operations globally. Applying lean principles, which are foundational to our management culture, we continue to work to improve our processes and program through structured problem solving. We understand that actions speak louder than words, so we focus on examples of how our employees work every day to further our human rights commitments.

Tran Che
Global Human Rights Counsel

Roger Martella
Chief Sustainability Officer
The Human Rights Challenge for GE

We innovate to drive sustainable progress across the globe

Our business
Our mission is to build a world that works. For more than a century, we have been at the vanguard of global technological progress – from the light bulb to the Haliade-X offshore wind turbine. Our innovations touch every facet of sustainable development. We operate in four sectors: Aviation, Healthcare, Renewable Energy, and Power. In each of these sectors, our mission is to drive sustainable progress across the globe by delivering and innovating technology the world needs.

GE Aviation
Mission
Providing customers with engines, components, avionics, and systems for commercial, military, business and general aviation aircraft, and a global service network to support these offerings.

GE Healthcare
Mission
Improving lives in moments that matter; operating at the center of an ecosystem working toward precision health – digitizing healthcare, improving access to quality and affordable healthcare, while helping drive productivity and improving outcomes.

GE Renewable Energy
Shared Mission
Powering lives and making electricity more affordable, reliable, sustainable for the benefit of people everywhere.

GE Power
Mission
Providing customers with engines, components, avionics, and systems for commercial, military, business and general aviation aircraft, and a global service network to support these offerings.

The shape of things to come

The Shape of Things to Come – Delivering for our future, working on technology that transforms lives.
We plan to form three independent companies focused on the critical global needs in aviation, healthcare, and energy.

Future of Flight – Helping customers achieve greater efficiency and sustainability and invent the future of flight.

Precision Health – Driving innovation in precision health to address critical patient and clinical challenges.

Energy Transition – Supporting customers and communities seeking to provide affordable, reliable, and sustainable power.

Product spotlights
The world’s largest and the most powerful aircraft engine, the GE9X, is also the most efficient engine we have ever built on a per-pounds thrust basis. The culmination of a complete renewal of our commercial engine product line, GE9X is designed to deliver up to 10 percent greater fuel efficiency than its predecessor, with emissions of nitrogen oxides (NOx) 55 percent below current regulatory requirements.

Product spotlights
Edison™ intelligence applications are designed to enable better patient care and increases access to care, and with Edison Marketplace, hospitals can test-drive AI-powered applications; Vscan Air™, handheld ultrasound that improves healthcare access, joins the Vscan Family technologies with 30,000 units in more than 100 countries.

Product spotlights
The world’s largest offshore wind farm in the North Sea will be powered by GE’s HaliadeTM-X turbine, the industry’s first 14MW offshore wind turbine; GE’s largest onshore wind turbine, Cypress, offers revolutionary two-piece wind blades, enabling increased output from hard-to-reach sites; GE’s state-of-the-art high voltage direct current (HVDC) transmission system will supply one of the world’s largest offshore wind farm projects off the coast of England.

Product spotlights
World-record setting HA turbines are the most efficient gas turbines and key force multiplier to accelerate decarbonization; leading Arabelle™ steam turbines in 53 GW of existing nuclear fleet generating 2 percent more power output with 99.96 percent reliability; developing advanced nuclear technology like BWRX-300 and Natrium™ will provide carbon-free electricity during operation, dependable base load, and flexible capacity.

* Jointly developed with TerraPower.
The human rights implications of our size and scope

Our innovations aim to improve the quality of life for all people. As a result, our reach provides a unique platform to build a world that works for tomorrow ... for everyone. But that unique scale comes with real human rights challenges. We are acutely aware that the corollary of every job we create, of every kilowatt of clean energy we generate, of every life our technology saves is a responsibility to respect the dignity of all whose lives we touch.

GE operates in more than 175 countries and, as a consequence, we have broad value chains, including in jurisdictions where the rule of law can sometimes be a challenge and vulnerable populations are present. In addition, depending upon the location, we are often required to use layers of intermediaries and navigate customary practices. All of this adds up to a unique human rights challenge.

Navigating these challenges, while safeguarding respect for human rights, requires relentless commitment, collaboration, and innovation, which are the hallmarks of GE and of our human rights program. Integrity and lean are fundamental to how we execute our strategy and are embedded in our culture. We strive every day and across the globe to effectively manage the challenges of scale, visibility, and influence that can impede the pursuit of human dignity for all. We are always focused on continuous improvement and know the application of our lean principles to continuously improve furthers our progress and enables us to stay focused on and committed to human rights.

*Metrics reflect estimated data from 2021.
Number of employees is based on full-time equivalent, active employees as of December 31, 2021.
Our Commitment

Our human rights principles are embedded across our operations and value chain

Policies
Our human rights program is built on a suite of straightforward and mutually reinforcing policies, embedded across our businesses, global operations, and value chain.

Human Rights Statement of Principles
We respect all internationally recognized human rights in line with:
• the UN Guiding Principles on Business and Human Rights; and
• the OECD Guidelines for Multinational Enterprises.

The cornerstone of our commitment is constant vigilance to identify and address human rights risks across our value chain in good faith and to the best of our ability. We endeavor to develop and continuously improve our procedures to identify, prevent, mitigate, and remedy our salient human rights impacts.

The Spirit & The Letter
GE personnel are bound by our code of conduct, The Spirit & The Letter (S&L). The S&L applies equally to all our majority-owned subsidiaries and affiliates, and details our integrity and compliance expectations, including our human rights expectations, of all GE directors, officers, and employees. The Human Rights Policy in the S&L provides an overview of employee responsibilities, examples of warning signs and red flags, and clear and specific language regarding how we expect our employees to treat those who work for and with us.

GE Integrity Guide for Suppliers, Contractors and Consultants (“Integrity Guide”)
GE business partners agree to abide by our human rights principles by signing on to the Integrity Guide, which requires “unyielding integrity and high standards of business conduct” of the third parties with whom we engage. All business partners receive a copy of the Integrity Guide supplemented with a training video available in multiple languages. Beyond compliance with all applicable local laws and regulations, the Integrity Guide mandates third-party adherence to our standards in the areas of, among other things, Human Rights, Respectful Workplace, and Environment, Health & Safety.

Human Rights Enterprise Standard
We have implemented operational requirements for businesses, known as the Human Rights Enterprise Standard, that help businesses identify and understand the salient human rights risks across the Company and set expectations regarding how to respond to those risks. The Enterprise Standard sets out minimum requirements that businesses must adhere to regarding risk assessment and identification, due diligence, and escalation and remediation of any concerns related to human rights. It also provides practical guidance and best practices for business implementation. By taking a lean approach and deploying the execution in a decentralized manner, businesses can better mitigate human rights risk within their operations.
Our Commitment

Training
For our human rights program to be successful, our employees, suppliers, and business partners need to understand the issues and our expectations. Therefore, we require: (i) all employees to review and acknowledge the S&L code of conduct annually, and complete S&L refresher training bi-annually and (ii) employee groups in higher risk jobs to take advanced training. Our learning modules explain the core principles of human rights, describe our company-wide policies and programs, and, most importantly, set forth our employees’ role in identifying and reporting possible signs of modern slavery when they are at our operations, supplier facilities, or customer sites. We also reinforce these lessons through a variety of communications, including leadership messages, newsletters, integrity campaigns, videos, infographics, and embedded messaging within various digital tools.

We provide direct material suppliers online compliance training that includes a module explaining our position on human rights, with an in-depth focus on forced labor – how to recognize it, how extensive the problem is globally, and what suppliers must do or avoid doing to comply with our forced labor policy. Suppliers view this video as part of their commitment to abide by GE’s Integrity Guide. Depending on the business relationship, GE may conduct additional training or follow-up discussions to ensure compliance expectations are understood and met.

We also provide training on forced labor prevention expectations to potential Engineering, Procurement and Construction partners on large GE Power and Renewable Energy construction projects, where low-skilled, migrant labor is likely.
**Oversight**

Our human rights program is embedded throughout our business by deploying a multi-layered approach with engagement from the most senior levels of the Company and execution driven by functional leaders within our businesses.

**Board Oversight**

The Board of Directors and its committees provide governance oversight with respect to the Company’s environmental, social and governance (ESG) strategies and initiatives – including human rights – as an integrated part of their oversight of GE’s overall strategy and risk management. In particular, the Governance and Public Affairs Committee (GPAC) meets at least twice a year to discuss the Company’s salient human rights risks and how those risks are being addressed.

**Global Law & Policy Oversight**

Our Global Human Rights Counsel is responsible for leading and setting the Company’s human rights strategy and working with the businesses to drive program implementation. She reports directly into the Chief Compliance Officer for the Company and works closely with the Company’s Sustainability Council, comprised of senior personnel from across the Company and each GE business, to establish ESG priorities and coordinate our global initiatives.

The Chief Compliance Officer for the Company leads the Policy Compliance Review Board (PCRB), which is the Company’s compliance governance body and is comprised of the Company’s most senior officers, including the General Counsel, the Chief Financial Officer, the Chief Human Resources Officer, and the Chief Risk Officer. The PCRB evaluates the Company’s compliance policies, programs and risk areas to ensure the Company is appropriately preventing, detecting, and addressing any significant risks. If material human rights risks arise, they (like any other compliance risk) are discussed during the PCRB, and agreed upon remedial actions are subsequently taken.

**Business Management**

To ensure that our human rights principles are integrated into our business operations, we have (i) created a cross-business/cross functional Human Rights Working Group and (ii) appointed a Human Rights Champion (“Champion”) in each business, who together ensure that the program is being implemented in the businesses. Champions represent diverse functions, including legal, compliance, human resources, sourcing, and environment, health & safety (EHS). The Human Rights Working Group meets regularly to discuss any issues with the implementation of the Human Rights Enterprise Standard (see Policies) and the evolving landscape of human rights issues and risks in the communities we serve. Champions then cascade this information to their Business Human Rights Risk Mitigation Team, who are responsible for assessing the effectiveness of their business program.

To the extent there are material risks or issues found related to human rights, such issues are escalated to both the Global Human Rights Counsel and the business Compliance Review Board (CRB), which is led by the Chief Compliance Officer for the business. The CRB meets on a regular basis with the business CEO and his/her senior leadership team to discuss key issues, the business’ ethics and compliance program, and key metrics. In addition, any necessary remedial actions are discussed during these meetings.
Our Priorities

Our diligence is structured to focus on the right priorities

Our integrated assessment
In 2020, we engaged a leading human rights advisory firm to conduct a global human rights assessment. Our goal was to identify our most salient human rights risks, to ensure that our human rights program adequately addresses those risks, and to identify ways in which we can best drive the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the UN SDGs forward.

To understand our biggest risk areas, the firm conducted a broad analysis of our businesses, our value chains, and the impact of our products and services on the communities in which we operate.

To evaluate the strength of the Company’s human rights program, the firm assessed our: (i) corporate commitment, as evidenced by our policies and reporting lines; (ii) diligence in terms of risk identification and management; (iii) remedy in terms of process and outcome; and (iv) disclosure. In general, the assessment revealed some notable strengths, but it also highlighted several areas for improvement, which we used to develop a detailed plan to enhance the program.

Salient risks
The assessment identified four priority issue areas for salience and impact: Climate and Energy; Product Stewardship; Worker Welfare; and Community Welfare. We have reported in detail on our Climate & Energy and Product Stewardship endeavors in our Sustainability Report, which has been updated and released in conjunction with this report. In this Human Rights Report, we will focus on Worker Welfare and Community Welfare, which can be examined across seven salient rights.

<table>
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<tr>
<th>Research</th>
<th>Engagement</th>
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<tr>
<td>The firm conducted a broad analysis of GE’s businesses and value chain, to identify human rights risks from the lowest-tier suppliers to individuals and communities affected by our products and services.</td>
<td>The firm engaged with a broad array of internal stakeholders and conducted a deep dive into stakeholder concerns, from civil society groups to international organizations and responsible investors.</td>
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<tr>
<th>Gap analysis</th>
<th>Prioritization</th>
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<tr>
<td>The firm conducted a thorough review of GE’s enterprise standards, risk-management protocols, and training materials across integrity topics to identify governance strengths and opportunities.</td>
<td>In general, the assessment revealed some notable strengths, but also highlighted several areas for improvement, which we used to develop a detailed roadmap for improvement, prioritizing human rights risks based on salience.</td>
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Our Priorities

1. Climate and energy*
2. Product stewardship*
3. Worker welfare
4. Community welfare

Seven priority rights*

1. Protection against slavery, servitude, and forced labor
   Modern slavery is among the most salient risks for any multinational company because of its severe impact on the human dignity of the most vulnerable. Our value chain runs through many countries and sectors and, therefore, our challenge is to gain visibility into, and leverage over, the sub-tier suppliers where this risk is highest.

2. Protection against child labor
   Child labor is salient for virtually every global company because of its severe impacts on the most vulnerable. Given our complex production and procurement processes, the risk is most salient in parts of our value chain where we have least visibility, several tiers deep in the sourcing of metals and rare earth minerals. See more information on Responsible Mineral Sourcing.

3. Freedom of association
   Freedom of association is foundational to many other protections for workers. While we actively promote freedom of association in our business operations, the challenge is navigating the different levels of protection for freedom of association in our global value chains.

4. Just working conditions
   Just working conditions captures a suite of worker-dignity protections including, among other things, non-discrimination, health and safety, fair pay, and working hours. These protections are the cornerstones of any effective human rights program, with the largest risks most present within our supply chain and in our commercial partnerships.

5. Right to health: environment
   Environmental stewardship is a critical concern for us across our operations and value chain—upstream and downstream. We recognize the close links between environmental and human rights risks, which are salient because of their potential scale and difficulty to remedy.

6. Right to security of the person
   Security concerns are particularly challenging deep in our upstream supply chain, in the sourcing of metals and rare earth minerals. The logistical and operational challenge for our program is that we have the least visibility and leverage in this part of our value chain. See more information on Responsible Mineral Sourcing.

7. Indigenous rights
   Indigenous rights are a critical concern for us in our downstream value chain because of the way our products are used in projects across the globe. Some of those projects touch on land and customary rights of vulnerable communities. Our practical challenge in such contexts is one of leverage, which is often limited with customers.

Impact Opportunities

In addition to identifying our most salient risks, the assessment looked at the areas in which we have a positive impact and identified four priority SDGs to help guide our human rights program:

1. Climate and energy*
   Through GE Healthcare, we are at the vanguard of precision healthcare. We are committed to using our innovations to improve healthcare for all people, of all ages, in all places. Being a market leader enables us to play a key role in driving progress in equitable and accessible healthcare.

2. Product stewardship*
   Our scale enables us to make a meaningful difference in the lives of workers everywhere. We do this directly through our commitment to fair treatment of our people and indirectly through our rigorous expectations of suppliers.

3. Worker welfare
   We are at the forefront of technological advances that are the cornerstones of sustainable economic growth. We provide power to a third of the world and our innovations in this space are critical in most countries. GE Aviation drives sustainable transportation across the globe. These businesses position us to lead the world in promoting sustainable industrialization.

4. Community welfare
   As a leading global business built on a culture of integrity, we can play a meaningful role in encouraging all governments with whom we engage to protect the rule of law and fulfill their human rights responsibilities.

These priorities shaped the practical roadmap for our program and will continue to inform its evolution as GE transforms for the future.

* See Sustainability Report for more details. Footnotes 1-7 can be found in the Appendices on page 20.
**Overview**

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**Our Program: Due Diligence**

**Upstream due diligence: Evaluating suppliers**

GE has long had a rigorous due diligence program reaching throughout our value chain. Every prospective supplier undergoes due diligence prior to signing an agreement with GE. We perform various levels of due diligence on suppliers based on detailed risk criteria, such as the supplier’s location, type and amount of work, and/or product being provided. Due diligence findings factor into whether we will pursue or continue a relationship with the entity.

**Supplier Responsibility Governance Program**

Since 2002, our commitment to unyielding integrity and high standards of business conduct has been embedded in our business and procurement operations through our Supplier Responsibility Governance (SRG) Program. SRG aims to build and continually strengthen an ethical, sustainable, and transparent global supply chain and establish clear social and environmental responsibility requirements for suppliers.

The SRG Program applies a systematic approach for assessing risks in our direct material supply chain. We use clear risk assessment criteria to prioritize suppliers for thorough audits depending upon factors such as what the supplier is producing, whether the manufacturing facility is in a higher-risk country (based on key indicators), whether labor brokers are used to recruit migrant workers, and how the supplier has performed in the past, including as reported in adverse media reports.

The SRG Program shapes our ability to continuously assess, monitor, and drive improvement in our supply chain. More importantly, through regular communication and engagement with our suppliers, we can have a positive impact on their human rights practices in general, beyond their work for us.

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**Upstream due diligence process map**

*Sourcing evaluation process*

1. **Risk assessment conducted**
   - Labor service providers/Contractors:
     - Suppliers providing labor services undergo a prequalification assessment focused on safety and human rights. The assessment considers supplier’s labor and wage practices, age and nature of workers, and recruitment tactics.
     - Gaps in the supplier’s program identified through the prequalification assessment are escalated to trained individuals at the businesses for review and mitigation, as necessary.

2. **Due diligence**
   - Identified issues must be remediated
   - Verification open items are closed

3. **Ongoing due diligence performed**
   - Material supplier onboarding:
     - SRG audit conducted
     - Identified issues must be remediated
     - Verification open items are closed

4. **Ongoing due diligence performed**
   - Contractor onboarding:
     - Safety, labor, and human rights check
     - Identified issues must be remediated
     - Verification open items are closed

5. **Ongoing due diligence performed**
   - Direct material suppliers:
     - Material providers for our products are subject to our rigorous SRG auditing program. The SRG auditors are trained on audit skills, risk identification and the SRG program and tools. Trainees must pass an assessment and then perform SRG audits with an experienced SRG auditing mentor before becoming certified.

6. **Ongoing due diligence performed**
   - Once trained, the GE auditors conduct visits (1 to 3 days) at the supplier’s facilities and, using a standardized and comprehensive audit questionnaire, review the supplier’s compliance with local law and GE’s policies on environment, health, safety, labor, security, and human rights. There is a significant focus on forced labor indicators, such as wage practices, recruitment efforts, and passport handling.

7. **Ongoing due diligence performed**
   - In order to monitor the continued compliance of our existing suppliers, we conduct follow-up audits every 1 to 5 years based upon the supplier’s risk profile.

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**When we conduct an adverse media report, we look for, among other things, human rights or forced labor violations, corruption allegations, safety issues, fraud concerns, and past/present legal proceedings. There are certain indicators that will always warrant heightened level of due diligence on a party, for example, where a GE employee raises a red flag/concern regarding the party.**
Our Program: Due Diligence

SRG Metrics 2021

1,115*  
Total global audits

6,031  
Total findings

966  
Total suppliers approved (new and existing)

14.41%  
Total human rights-related findings

26  
Total suppliers rejected (new and existing)

Upstream due diligence

How we address negative findings

We record, track and monitor all SRG audit findings in our proprietary reporting tool, which is supplemented with information from regional databases. Suppliers are expected to address findings within 60 days, with GE auditors verifying the elimination of or appropriate mitigation of such risks. When issues are identified, our goal is to work with and coach the suppliers to bring their practices into compliance with our requirements as this is in the best interest of the workers. However, we will suspend or terminate our relationship with a supplier if the supplier is uncooperative or findings are not promptly addressed.

Finally, we are continually evaluating new methods to assess and manage risk in our supply chain to ensure we are effectively addressing evolving challenges and risks. For example, following the pandemic travel restrictions in 2020 and 2021, we pivoted to desktop audits so that our program could continue. Applying the same scope and questionnaire used in the on-site audits, our remote audits relied on digital tools to allow suppliers to provide supporting documentation and to verify the closure of audit findings. We continue to explore options to improve our virtual auditing capabilities, as this will enable us to perform audits on more suppliers.

* The number of total global audits is greater than that of total suppliers reviewed as there were suppliers that were audited twice (i.e., desktop audit due to COVID-19 restrictions and then on-site visit) or a return visit to confirm corrective actions performed.
Downstream due diligence: Commercial evaluation process
As with our supply chain, we conduct due diligence for our commercial transactions to ensure compliance with our human rights policies and standards. Prior to entering into any agreement with a commercial party, we assess the level of risk by evaluating criteria such as the location of the commercial party, the type of relationship formed, what is being sold to or created with the party, and whether the commercial party will be serving as a channel partner or an authorized representative of GE in the market. Based on that analysis, the level of required due diligence (standard, heightened or enhanced) is determined. We then engage with a third-party due diligence firm to evaluate adverse media and previous issues concerning a commercial party’s human rights or forced labor violations, corruption allegations, safety issues, fraud concerns, trade control problems, and past and present legal proceedings.

In addition to party due diligence, some transactions may warrant a human rights review of the transaction itself to assess if there is a human rights impact on the local community. We conduct this review to specifically address indigenous rights concerns and, based upon concerns identified with local community members and/or commercial parties, we may take action.

Downstream due diligence
How we address negative findings
When issues are identified during the due diligence process, we seek to understand whether the issues have been addressed. We may meet with the commercial party’s leadership team for a better understanding of identified issues and any remedial actions they have taken. Once that has been completed, we will assess whether the potential risk is outweighed by the positive impact the relationship may have for the business and community receiving the product or service. Appropriate risk mitigation steps are taken after consultation with the risk, compliance, and legal team.

If the commercial relationship runs counter to our values, or where we find that the risks outweigh the potential positive impacts, we will walk away from bidding on a deal or from signing the sales agreement (see example on page 16).

In both upstream and downstream relationships, where we have an ongoing relationship for a period of time, we will seek audit rights with the third party. Depending on the relationship, it may be easier to incorporate audit rights into an agreement, but where there is little to no leverage (particularly in commercial relationships) the scope of the audits may be limited or audit rights may not be permitted.

Upstream due diligence
Responsible Mineral Sourcing
Essential to so many of our innovations is the use of metals and rare earth minerals, sourcing of which is several tiers deep in our supply chain. When obtaining products containing tin, tantalum, tungsten, or gold (known collectively as “3TG”), as well as cobalt and/or mica, all of which are common constituents of many of our products, we strive to assure that our supply chains are ethical and sustainable. We strive to eliminate all “conflict minerals” from our products, which may finance armed groups in the Democratic Republic of Congo (DRC), its adjoining countries or other conflict-affected and high-risk areas (CAHRAs). For conflict minerals, each year we undertake reasonable due diligence to determine if any of our products containing 3TG originated in the DRC or other CAHRAs. We then file a report with the U.S. Securities and Exchange Commission on the use of 3TG in our products and the outcome of our 3TG sourcing due diligence. For more information, see our Conflict Minerals Report.

We recognize that conflict is just one of the risks related to mineral sourcing, and other critical issues such as poverty, environmental degradation, child labor, and general inequality must be addressed as well. For more information, see our Responsible Mineral Sourcing Principles.
Stakeholder engagement

Stakeholder engagement is critical to our human rights program. We engage regularly with our workers, labor unions, civil society groups, and responsible investors to identify and address human rights risks across our value chain. We conduct human rights due diligence across our value chain, including with human rights risk and impact assessments globally, by country or region, by business or function, or by product line. Such assessments may be standalone or integrated in existing protocols and processes. Where reasonable, we will seek to engage with stakeholders affected by our activities to understand and address their concerns in good faith and in line with our human rights commitment.

Beyond our own workers and suppliers, we engage with external stakeholders to identify human rights risks throughout our value chain and, once identified, we collaborate with peers, experts, and civil society groups to seek practical solutions. We have also partnered with several organizations to advance business respect for human rights across the globe.

As a founding member of the Global Business Initiative on Human Rights (GBI) in 2009, we work closely with other dedicated multinational companies to navigate the practical challenges in embedding respect for human rights across our businesses. Peer learning and collaboration enable us to determine the right strategy to address human rights risk in our businesses.

By engaging with industry leaders in GBI, we gain insights into emerging trends, challenges and solutions observed and used by other members of this business-led group.

Freedom of association

We are committed to engaging meaningfully and in good faith with worker associations and unions. We have represented employees in many countries, including in the U.S., China, and throughout Europe. In the U.S., we have approximately 5,750 union-represented manufacturing and service employees. The majority are covered by a 4-year national agreement with unions, including the IUE-CWA, among others. In China, 21 of our 43 GE legal entities have unions representing nearly 13,000 employees, all affiliated with the All-China Federation of Trade Unions, including our China headquarters in Shanghai. In Latin America, nearly 12,000 of our employees are represented by unions.

In Europe, we engage with worker organizations through works councils, trade unions, and other employee-representative bodies.

Since 2017, we have also been actively engaged in the Leadership Group for Responsible Recruitment (LGRR), a collaboration between leading companies and expert organizations to drive progress in the way that migrant workers are recruited, with a focus on eliminating fees being charged to workers to secure employment. LGRR works with GE and member companies to create demand for responsible recruitment by raising awareness about the benefits of ethical practices and developing tools to help companies implement their public commitment to the Employer Pays Principle. Under the Principle, no worker should pay for a job—the costs of recruitment should be borne not by the worker but by the employer.

Finally, we have been a proud signatory to the United Nations Global Compact (UNGC) since 2008. The UNGC is both a policy platform and a practical framework for companies that are committed to sustainability and responsible business practices. As a multistakeholder leadership initiative, it seeks to (i) align business practices and strategies with the Ten Principles in the areas of human rights, labor, environment and anti-corruption, and (ii) catalyze actions in support of broader societal goals, such as the 17 SDGs. As a signatory, we submit a Communication on Progress (COP) to the UNGC website, which we share widely with our stakeholders.

It is vital that leading companies such as GE use their leverage to promote human rights not just in their own supply chains but in all areas where they have influence. GE’s commitment to the Employer Pays Principle helps to drive change in the way that migrant workers are recruited in all sectors and locations.

Neill Wilkins
Institute for Human Rights and Business – Head of Migrant Workers Programme
Our Program: Engagement and Remedy

**Investigation process**
We fully examine every integrity concern raised and take necessary remedial action where appropriate. During the investigation process, we:

- Form an independent and objective investigation team;
- Obtain the facts through interviews and/or reviews of documents;
- Reach conclusions, whenever possible, from the facts the team is able to obtain;
- Recommend corrective action, if necessary; and
- Provide the person who raised the original concern (if that person is known) with feedback on the outcome, while maintaining the confidentiality and privacy of all involved (to the largest extent possible).

**Key performance indicators**
We measure the strength of our Global Open Reporting & Ombuds Program through several key performance indicators and metrics, which are reviewed at least monthly throughout the year. The program tracks the number of days that it takes to close each investigation raised through the program on a monthly basis, targeting resolution within 60 days of the concern being raised. The program also measures cases per 1,000 employees, which enables year-over-year comparisons within and across businesses, and enables us to control for any headcount changes. In addition, we track confirmation and anonymity rates, which are important to understand the health of our program.

In early 2021, we began to apply lean thinking and principles through a series of Kaizen events to further improve this process. We learned that we can, in fact, improve our performance, reduce our lead times and improve the quality of the program by, among other things, augmenting our standard work, reducing the number of people that are involved in the process, and enhancing automated solutions.

In 2021, 2,355 integrity concerns were raised, 2,275 of which were closed, with the remaining cases pending ongoing investigations and further review.

**Program governance**
At a corporate level, through the PCRB (see Oversight), the GE Chief Compliance Officer discusses significant program updates, key performance indicators representing the health and performance of the program, open reporting trends, significant investigations, and business updates on key risk areas. In addition, the Chief Compliance Officer, Vice President of Global Investigations and Global Ombuds Leader report on the same issues to the Audit Committee several times a year. At the business level, open reporting trends and significant investigations are also discussed regularly at CRBs (see Business Management) attended by the most senior business leaders, including the CEO.

Additionally, a dedicated Significant Cases Committee ("SCC") is responsible for performing monthly reviews of high-risk open reporting investigations across the Company. The members of the SCC include the Vice Presidents of Internal Audit, Compliance, and Global Investigations. The SCC reviews the significant case criteria annually to ensure both internal and external risks are considered.
Our value and respect for human rights make a difference in how we operate and conduct business. Below are a few examples of our principles in action:

Upstream due diligence
Upholding our values
A civil society organization raised human rights concerns to us about one of our suppliers in South East Asia. We investigated those concerns and found credible findings of human rights violations and corruption. We followed up with the supplier to inquire about these findings. The supplier denied any wrongdoing and failed to show how they took steps to mitigate human rights and corruption risks. We determined that the supplier had violated GE’s Integrity Guide, and the GE business exited the relationship, finding an alternate provider for those goods.

Open reporting
Working with contractors to remediate issues
A GE employee raised a concern through the Global Open Reporting & Ombuds Program after becoming concerned that contractor security guards were working long hours without adequate rest breaks. Our team investigated this site and identified that employees from the contracted security company were not provided with adequate rest breaks and, in addition, were being required to work overtime in excess of the amount permitted by local law. Additionally, the investigation uncovered that a contracted cleaning company had not been adequately paying overtime to its cleaning staff for hours worked. The cleaning company indicated that they did not understand the local laws around overtime payment and worked with us to correct payments by instituting backpay to the cleaning staff along with appropriate payments for overtime moving forward.

The cleaning crew expressed gratitude to be able to lean into local GE resources to help navigate the complex laws around overtime payment. The security company, however, failed to cooperate with us during the investigation and refused to change its practices and we thus terminated the contract.

SRG: Upstream due diligence
Stopping for safety
An ongoing SRG audit of a supplier revealed that the supplier had over 16 compliance-related “red flag issues.” The supplier failed to close these red flag issues in a timely manner. As a result, Sourcing – supported by our business leadership team – issued a “stop work” order blocking all new purchase orders from that supplier. The supplier’s leadership team noticed, which enabled us to collaborate with the supplier to address and close those critical findings, thereby reinstating the supplier.

Downstream due diligence
Choosing only the right opportunities
We were evaluating whether to enter a bid to supply energy equipment for a $200M project. During our commercial due diligence, we identified significant project-related community risks. After conducting a human rights assessment, the business decided to withdraw its bid to supply equipment to the project as the risks to people and the environment were serious.
**Our Program: Signature Programs**

**Pro bono and community engagement**

Our employees have a proud history of donating their time and talents to pro bono projects and community initiatives designed to promote human rights, diversity, equity and inclusion, and the rule of law around the world. Below are a few examples which highlight some of the recent projects led by members of our global workforce.

In Durgapur, India, we train and hire women in a remote village to work at our local manufacturing site. Every year, we host about 20 women apprentices in a year-long apprenticeship program. The apprentices are supervised by our leaders and trained directly on our shop floors on technical, communication, interpersonal, and compliance skills, with the goal of future employment as technician workers at GE sites. We also provided upskilling to 4,000 construction workers across India and provided a certification to allow for future job opportunities. Workers were upskilled in the areas of environment, health and safety, and productivity, which empowered them to apply their skills beyond GE-related or energy-related projects.

Since 2016, we have sponsored three Equal Justice Works Fellows engaged in projects promoting access to justice for underserved communities. Past projects focused on LGBTQ rights and the intersection of immigration and family law. The most recent fellowship project is focused on advocating on behalf of incarcerated women in Massachusetts and serving their unique legal needs through trauma-informed representation, rights education, policy reform, and increasing public awareness.

We are also a co-founder of a new non-profit, the Corporate Alliance for the Rule of Law (CAROL), dedicated to promoting the rule of law around the world. Through CAROL, we partner with the World Economic Forum and the Cyrus R. Vance Center for International Justice to develop and launch projects that leverage the expertise of in-house counsel to further the SDGs related to the support of strong justice systems. For example, in October 2019, our lawyers and other CAROL member companies led a workshop on international financial transactions and compliance for the Guatemalan Association of Judges for Integrity in response to a request for international expertise to strengthen the capacity and independence of the Guatemalan judiciary. In the winter of 2020-21, at the request of the Kenya Magistrates and Judges Association, our lawyers and other CAROL member companies conducted virtual workshops for over 70 Kenyan judges on international capital markets, abuse of corporate structures, corporate compliance and internal investigations, money laundering, asset recovery and forfeiture, as well as the challenges of adjudicating cases that involve electronic evidence.

Beginning in 2021, GE Corporate and the GE Global Law & Policy Pro Bono Work Group joined forces to launch the "Access to Justice Practicum" initiative of the Cyrus R. Vance Center for International Justice. The Practicum provides financial support and expertise to local NGOs tackling systemic problems facing poor and marginalized communities in Latin America and their access to justice. For the first edition of the Practicum, three young, talented lawyers from Argentina, Colombia and Mexico were hired, trained and supported.

**Access to Justice Practicum projects**

**Colombia**

We are partnering with Fundación Pro Bono Colombia to set up a medical legal partnership, providing legal services at clinics and hospitals to address the social determinants of health and difficulties in accessing health services.

**Mexico**

We are partnering with Fundación Barra Mexicana and Centro Mexicano Pro Bono to strengthen pro bono services for victims of gender-based violence by developing a toolbox of legal and advocacy skills necessary for effective pro bono representation in such cases.

**Argentina**

We are partnering with the Pro Bono and Public Interest Committee of the City of Buenos Aires Bar Association to support the legal need of children and adolescents who experience sexual violence and abuse by strengthening the capacities of the Live Network Association ("Asociación Red Viva"), which has provided holistic services to the affected community since 2015.
in developing pro bono initiatives hosted by a leading pro bono organization in each country. We co-fund the practitioners with partnering law firms for each country, while providing training, mentoring and support to the practitioners’ work. The Practicum projects will address child sexual abuse (Argentina), access to healthcare (Colombia), and gender violence (Mexico). Over time, the Practicum aims to transform the nature of legal services available to vulnerable communities across Latin America.

We are also a supporting partner of Lawyers for Racial Justice, which seeks to provide: (i) systemic change to promote long-term reform; and (ii) remote pro bono legal clinics to advise those dealing with the effects of potentially discriminatory policies. Our lawyers have volunteered their time to conduct research in support of Lawyers for Racial Justice Initiatives on topics including laws regulating child labor in the U.S. and the disproportionate impact of discipline in schools on minority communities.

Our lawyers are also partnering with the International Rescue Committee (IRC) to represent clients who have been threatened by the Taliban for human rights activity in Afghanistan. For example, one set of clients includes a family of eight (ranging from ages 6 months to 63 years old), who have been targeted based on their involvement with humanitarian and women’s rights advocacy. Our lawyers are filing applications on their behalf for Humanitarian Parole, which would allow them temporary entry to the United States based on ongoing threats to their safety. We are also working with IRC to help file asylum applications on behalf of thousands of Afghan citizens currently living in the United States on temporary status after being forced to flee their country in 2021.

Finally, together with attorneys from DLA Piper and its African member firm, Chibesakunda & Co., our lawyers work with New Perimeter (DLA Piper’s non-profit affiliate) to train law students at the Zambia Institute of Advanced Legal Education (ZIALE) on negotiation and legal drafting skills. The training courses aim to support Zambia’s lawyers and legal institutions by building the capacity and skills of ZIALE through the introduction of new teaching methodologies and materials. The project also aims to support the country’s next generation of lawyers by exposing them to international best practices and connecting them to experienced legal practitioners who serve as role models and mentors. This project builds on a previous collaborative pro bono project undertaken by DLA Piper and GE at the Law School of Tanzania in Dar El Salaam, which trained over 1,300 graduate law students in legal drafting from 2009-2016.

Diversity, Equity, & Inclusion

We know inclusion and diversity make us more competitive and help create value for our customers, investors, and employees. We believe that fostering an inclusive culture empowers everyone to do their best work because they feel accepted, respected, and that they belong.

Earlier this year, we released our 2021 Diversity Report, in which we highlight, among other things, our focused commitment to Equal Pay for All. On average, men and women performing similar work are paid within 1% of each other in each GE business. Maintaining pay equity is a priority for the Company and we will continue to monitor and communicate our pay equity results on an ongoing basis.

Diversity is further supported by the work, advocacy and leadership of our Employee Resource Groups (ERGs). For 30 years, our ERGs have added value to our colleagues and businesses by helping to engage and develop the diverse talent needed to build a world that works. These are communities built on common backgrounds and experiences that welcome all employees to learn, connect, advocate, and foster a sense of belonging. Our ERGs include:

- African American/Affinity Forum
- Asian Pacific Allies & Friends
- Disability Advocacy Network
- Green Team Network
- Hispanic Forum
- Pride Alliance
- Veterans Network
- Women’s Network

CLICK HERE TO FIND OUT MORE
A2.3 How does the company make clear the importance it attaches to the implementation of its human rights commitment? Sustainability Report
Human Rights Statement of Principles
Section Our Priorities, pages 09-10

A2.4 What kinds of human rights issues are discussed by senior management and by the Board, and why? Human Rights Report
Human Rights Statement of Principles
Section our Program-Due Diligence, page 11-13

A2.5 How does the company demonstrate the importance it attaches to the implementation of its human rights commitment? Sustainability Report
Human Rights Statement of Principles
Section our Program-Due Diligence, page 11-13

PART B: DEFINING THE FOCUS OF REPORTING

B1 Statement of salient issues: State the salient human rights issues associated with the company’s activities and business relationships during the reporting period. Human Rights Report
Human Rights Report: Section Our Priorities, pages 09-10

B2 Determination of salient issues: Describe how the salient human rights issues were determined, including any input from stakeholders. Human Rights Report
Human Rights Report: Section Our Priorities, pages 09-10

B3 Choice of focal geographies: If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made. Human Rights Report
Human Rights Report: Section Our Priorities, pages 09-10

B4 Additional severe impacts: Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues, and explain how they have been addressed. Human Rights Report
Human Rights Report: Section Our Priorities, pages 09-10
Section Our Program, pages 11-16

PART C: MANAGEMENT OF SALIENT HUMAN RIGHTS ISSUES

Specific Policies

C1 Does the company have any specific policies that address its salient human rights issues and, if so, what are they? Human Rights Report
Human Rights Report: Section Our Commitment-Policies, page 06

C1.1 How does the company make clear the relevance and significance of such policies to those who need to implement them? Human Rights Report
Human Rights Report: Section Our Commitment-Policies, page 06

Stakeholder Engagement

C2 What is the company’s approach to engagement with stakeholders in relation to each salient human rights issue? Human Rights Report
Human Rights Report: Section Our Priorities, pages 09-10
Section Our Program-Due Diligence, page 14

C2.1 How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so? Human Rights Report
Human Rights Report: Section Our Program-Due Diligence, page 14

C2.2 During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why? Human Rights Report
Human Rights Report: Section Our Program-Due Diligence, page 14

C2.3 During the reporting period, how have the views of stakeholders influenced the company’s understanding of each salient issue and/or its approach to addressing it? Human Rights Report
Human Rights Report: Section Our Program-Due Diligence, pages 14, 16

Appendices
UN Guiding Principles Reporting Framework

PART A: GOVERNANCE OF RESPECT FOR HUMAN RIGHTS

Policy Commitment

A1.1 How has the public commitment been developed? Sustainability Report
Human Rights Statement of Principles
Section Our Commitment-Policies, page 06

A1.2 Whose human rights does the public commitment address? Human Rights Statement of Principles
Section our Program-Due Diligence, page 11-13

A1.3 How is the public commitment disseminated? Sustainability Report
Human Rights Statement of Principles
Section Our Program-Due Diligence, page 11-13

A2.1 How is day-to-day responsibility for human rights performance organized within the company, and why? Human Rights Report
Human Rights Report: Section Our Commitment-Training, page 07

A2.2 What kinds of human rights issues are discussed by senior management and by the Board, and why? Human Rights Report
Human Rights Report: Section Our Commitment-Training, page 07

A2.3 How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions? Human Rights Report
Human Rights Report: Section Our Commitment-Training, page 07

A2.4 How does the company make clear in its business relationships the importance it places on respect for human rights? Human Rights Report
Human Rights Report: Section Our Commitment-Training, page 07

A2.5 What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result? Human Rights Report
Human Rights Report: Section Our Program-Engagement and Remedy, pages 15-16
PART C: MANAGEMENT OF SALIENT HUMAN RIGHTS ISSUES continued

Assessing Impact

C3  How does the company identify any changes in the nature of each salient human rights issue over time?

C3.1 During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?

C3.2 During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?

Integrating Findings and Taking Action

C4  How does the company integrate its findings about each salient human rights issue into its decision-making processes and actions?

C4.1 How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?

C4.2 When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?

C4.3 During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?

Tracking Performance

C5  How does the company know if its efforts to address each salient human rights issue are effective in practice?

C5.1 What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?

Remediation

C6  How does the company enable effective remedy if people are harmed by its actions or decisions in relation to a salient human rights issue?

C6.1 Through what means can the company receive complaints or concerns related to each salient issue?

C6.2 How does the company know if people feel able and empowered to raise complaints or concerns?

C6.3 How does the company process complaints and assess the effectiveness of outcomes?

C6.4 During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?

C6.5 During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?
Culture of integrity in all that we do

- Precision Health that personalizes diagnoses and treatments
- Environmental stewardship
- Commitment to human rights
- Lifting our communities
- Safety for our people
- The energy transition to drive decarbonization
- A future of smarter and more efficient flight

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