Introduction

This Statement is made voluntarily pursuant to Section 54(1) of the Modern Slavery Act 2015 (the “Act”) by General Electric Company on behalf of its affiliates conducting business in the UK and covered by the Act (as listed in Appendix A herein referred to as “GE Reporting Entities”), (together the “Company” or “GE”). The Statement discusses actions GE took in its prior fiscal year to address risks of modern slavery in its own operations and value chain, and which the Reporting Entities participated in as part of GE’s human rights program.

GE delivers innovative solutions and services to provide essential infrastructure for the world. We work with the highest integrity, a compliance-oriented culture, and respect for human rights, while also setting ambitious goals to reduce emissions through operational efficiencies and technology. This statement builds on statements we’ve submitted under the California Transparency in Supply Chains Act of 2010 and the Australian Commonwealth Modern Slavery Act 2018 to demonstrate GE’s continued commitment to address modern slavery and other human rights risks throughout our global operations and value chain. We are proud of our efforts on this issue but are mindful that our program must continually improve as we remain vigilant in our fight against this global human rights crisis.

As we detail below, GE continued our extensive efforts to prevent forced labor in the Company’s supply chain through on-site audits, employee training, and supplier pre-qualification and education. We view multi-stakeholder collaboration as critical to winning this battle, and in 2021 we continued to engage in joint efforts to drive change in challenging regions and sectors, particularly in the area of ethical recruiting.

Our Structure, Operations & Supply Chain

Structure and Operations

GE is a high-tech industrial company that operates worldwide through its four segments, Aviation, Healthcare, Renewable energy, and Power. In November 2021, we announced a strategic plan to form three industry-leading, global, investment-grade public companies from our (i) Aviation business, (ii) Healthcare business and (iii) combined Renewable Energy, Power and Digital businesses.

At year-end 2021, GE and consolidated affiliates employed approximately 168,000 employees, of whom approximately 7,747 were employed in the UK. A more detailed description of GE’s business operations and ambitions can be found in our 2021 Annual Report.

We serve customers in over 175 countries. Manufacturing and service operations are carried out at 71 manufacturing plants located in 26 states in the United States and Puerto Rico and at 130 manufacturing plants located in 33 other countries.

GE owns and controls the GE Reporting Entities listed in Appendix A. GE Company is incorporated in New York, with its principal executive office in Boston, Massachusetts, USA.
Supply Chain
GE’s supply chain is expansive and global, spanning 125 countries. We source a wide variety of raw materials and components that are incorporated into the products and services that GE sells. The largest categories of direct material purchases are castings, forgings, electronics and machined parts. GE also buys products and services to support our business operations, which are used to develop or create, but are not incorporated into, GE’s products or services.

Our Commitments & Programs
Our commitment to human rights is grounded in the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the Ten Principles of the United Nations Global Compact. Driven by those standards, we strive to respect the fundamental dignity of everyone we might affect directly through our operations, products, and services and indirectly through our business relationships across the globe. Our ideals flow from the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the Sustainable Development Goals.

Using those as our foundation, we address modern slavery risks through specific policies, training and awareness, due diligence and remediation.

Policies & Standards
The Company’s Human Rights Statement of Principles (applicable across GE, including the Reporting Entities) is the cornerstone of our global program, emphasizing the importance of “respect for fundamental human rights.” The Statement specifically prohibits reliance on any form of forced, prison or indentured labor and is embedded in expectations of all businesses and personnel through our Code of Conduct, The Spirit & The Letter.

The Spirit & The Letter (“S&L”) sets the Company’s expectations regarding ethics & compliance and applies to all GE directors, officers and employees, including those working for our subsidiaries and affiliates. All new hires are required to review and agree to abide by the S&L during the onboarding process, and employees are further expected to annually acknowledge their commitment to comply. The S&L and its accompanying policies, including a new policy dedicated exclusively to human rights, address the full spectrum of integrity and compliance issues across GE’s global value chain. GE expressly prohibits the types of actions associated with the most common forms of modern slavery, including the charging of recruitment fees, the withholding of immigration documents, and the use of misleading recruitment tactics. Violations of this policy can result in disciplinary action, up to and including termination.

The Human Rights Enterprise Standard (applicable across GE, including the Reporting Entities), and intended specifically for GE business compliance professionals, supplements the S&L Human Rights Policy by setting forth the core human rights expectations of the businesses. More specifically, the document outlines auditable controls and requires that the businesses have appropriate mechanisms in place to monitor those controls. The Enterprise Standard further sets out minimum requirements regarding risk assessment and mitigation, due diligence of third parties, and escalation and remediation of any concerns related to human rights. Other related policies and procedures, such as the S&L Environment, Health, and Safety Policy and the S&L Respectful Workplace Policy, are also embedded through GE’s business enterprise through similar enterprise standard and policy documents.

The Company’s Integrity Guide for Suppliers, Contractors and Consultants (which is applied by all GE companies, including the Reporting Entities, when applicable) extends the reach of our Code of Conduct and its requirement of “unyielding integrity and high standards of business conduct” to our suppliers and their subcontractors, including labor providers. Beyond compliance with all applicable local laws and regulations, the Integrity Guide mandates third-party adherence to GE standards in areas including respectful workplace, environment, health and safety, and human rights. In the area of forced labor, the Integrity Guide expressly prohibits any form of compulsion, coercion or human trafficking; lists prohibited activities associated with trafficking, such as withholding passports, charging recruitment fees, and misleading recruitment; and imposes affirmative obligations on suppliers in certain circumstances such as reimbursement of return transportation costs and providing workers with written contracts in a language they understand. We most recently updated the Integrity Guide in early 2022 to clarify and expand upon our human rights-related expectations. The Guide also encourages reports of violations of the policy through telephone, email and in-person channels by employees and third parties.
Goverance
GE has embedded respect for human rights throughout our global organization. Our Global Human Rights Counsel is responsible for setting human rights strategy for GE businesses, including our modern slavery program. She works closely with a cross-functional Environmental, Social and Governance (“ESG”) Steering Committee, comprised of senior personnel from across the Company, to establish ESG priorities and coordinate GE’s global initiatives. The Company’s Board of Directors and its committees oversee the execution of GE’s ESG strategies and initiatives— including regarding human rights—as an integrated part of their oversight of GE’s overall strategy and risk management. The Reporting Entities, through their business divisions, are responsible for operationalizing the Company’s governance strategy.

Training & Awareness
GE’s human rights program depends on the practical understanding of our people and business partners. We provide our businesses with learning modules on human rights and forced labor which give employees an easy, efficient way to understand the core principles of human rights; the Company wide policies and programs; the causes and global footprint of forced labor; and most importantly, how they can serve a role in identifying and reporting possible signs of modern slavery when they are at GE operations, supplier facilities, or customer sites.

We ensure that this awareness raising is ongoing. At their discretion, businesses have launched “Human Rights Month” and related spotlight campaigns in which we remind and reinforce our principles to our employees and provide them with relevant learning resources and materials on their role. For example, we have distributed an internal training video discussing a real wage-withholding scenario one of our businesses confronted with its vendors and using that example to once again educate the workforce on issues that can lead to forced labor.

GE businesses provide their direct material suppliers an online compliance video that includes a module explaining GE’s position on human rights, with a more in-depth focus on forced labor—what it is, how extensive the problem is globally, and what suppliers must do or avoid doing to comply with GE’s forced labor policy. Suppliers view this video as part of their commitment to abide by GE’s Integrity Guide. The Company also provides training on its forced labor prevention expectations to potential Engineering, Procurement and Construction (“EPC”) partners on large GE Power and Renewables construction projects, where low-skilled, migrant labor will likely be working.

We deploy “fast training” learning modules on human rights and forced labor to our employees and business partners for a brief, practical way to understand indicators of key risks; the Company’s policies and programs; the causes and global footprint of forced labor; and most importantly, how they can serve a role in identifying and reporting possible signs of modern slavery when they are at GE operations, supplier facilities, or customer sites.

Processes & Risks: Due Diligence & On Site Supplier Assessments
GE strives to ensure compliance with these policies through a rigorous due diligence program reaching throughout our value chain.

One significant way GE advances respect for human rights, in particular in the area of forced labor, is through our well-established, multifaceted ethical supply chain program. Under this program, GE businesses (of which the Reporting Entities are a part) conduct due diligence on their suppliers, known as the Know Your Supplier (“KYS”) process, where, based upon the location and type of service engagement, GE will research and review the third party for human rights risks. Additionally, suppliers in high-risk countries will undergo an in-depth, on-site assessment of their manufacturing site, both before they are approved for onboarding and periodically thereafter, to ensure supplier compliance with GE’s principles on fundamental human rights. Among other things, these assessments inquire specifically into how workers are recruited into their jobs and treated by their employers to detect any conditions of modern slavery.

In 2021, despite the restrictions and impacts caused by Covid-19, GE businesses, including those within which the Reporting Entities sit, assessed approximately 1,115 new or existing suppliers, generating more than 6,030 findings. Since 2005, GE businesses have conducted more than 35,000 supplier assessments spanning 100 countries. GE publishes an annual overview of its businesses’ supply chain assessment results on its website and Sustainability Report. The human rights portion of the assessment focuses significantly on forced labor indicators, such as wage practices, recruitment efforts, and passport handling. The questionnaire and indicators provide GE with a way to assess potential suppliers on their human rights programs, educate them as to the nature of forced labor and explain what is needed to prevent it.
We track and monitor results with a proprietary reporting tool, which is supplemented with information from regional databases. When issues are found in supplier assessments, our initial goal is to work with the suppliers to bring their practices into compliance. Suppliers are expected to address findings within 60 days, with GE auditors verifying the elimination of or appropriate mitigation of such risks. GE can suspend—and has suspended—purchase orders with suppliers who do not meet our integrity expectations under the contract.

**Modern Slavery Risks**

Based on our due diligence and risk assessments, we have identified the following general types of modern slavery risks that may be present in our operations and supply chains:

1. **Operations** – In our operations, modern slavery risks may exist within the population of contingent workers that support GE office sites. These workers provide janitorial, food/beverage, security and other facilities-type services. These contingent workers are primarily provided through an enterprise-wide vendor arrangement but may also be further sub-contracted. GE maintains a strong partnership with the vendors who provide us with our contingent workers and conducts periodic reviews to ensure they are complying with their obligations and respecting human rights.

2. **Supply Chain** – Due to the nature of GE’s products and services, potential sources of modern slavery risks include manufacturing sites in high risk countries; mineral sourcing deep in our supply chain; and use of low-skilled and/or migrant workers from subcontractors. Our modern slavery risks are most acute in those parts of our supply chain where we have limited or no visibility, such as subcontractors using seasonal, low-skilled, and/or migrant labor and pre-smelter mineral sourcing. GE is also committed to work to eliminate from our products all minerals that support armed groups in the Democratic Republic of the Congo or from conflict-affected and high-risk areas (“CAHRAs”), while at the same time minimizing unintended consequences for legitimate miners and their dependents. More information on our responsible mineral sourcing program can be found in our Responsible Mineral Sourcing Statement of Principles.

**Ensuring Continuous Improvement**

GE assesses the effectiveness of actions through the Human Rights Working Group, review & analysis of its supply chain audit results, and learnings from the Open Reporting & Ombudsman program.

**Human Rights Working Group**

Our Global Human Rights Counsel leads a cross-functional Working Group of Human Rights Champions across all GE business units. The Working Group meets regularly to review key findings, share important legal and regulatory alerts, learn best practices and discuss trends identified through our various due diligence and investigative processes. The Working Group is comprised of representatives from the various businesses, known as Human Rights Champions, who represent different functions – including Human Resources, Sourcing, Legal/Compliance – to address feedback and opportunities. As deemed necessary, the Working Group may partner with local business teams to engage suppliers on their compliance and human rights programs to understand how modern slavery risks are mitigated. The Working Group also focuses on the implementation of the Human Rights Enterprise Standard.

**Ongoing Assessment & Effectiveness Review**

GE strives for continuous improvement in all aspects of its operations. GE’s Ethics & Compliance team runs an annual assessment that focuses on evaluating the inherent risks and the strength of our internal controls across all our businesses. The assessment process asks each business to benchmark its own compliance programs against the Human Rights Enterprise Standard (among others), which the Ethics & Compliance team includes in an overall assessment as to how GE performs in this key policy area. Insights from this process are used in many aspects of the compliance program including by identifying additional training needs, control improvements, and other areas that may need remediation efforts. For example, in 2021, we added more rigorous contractor pre-qualification assessments, mandating follow-up with contractors when specific human rights practices appear deficient and working to close those gaps prior to start of work. GE also actively engages with external stakeholders such as the Global Business Initiative and the Leadership Group for Responsible Recruitment (see Our Partnerships), to benchmark our program’s practices and identify ways to improve effectiveness.

**Global Open Reporting & Ombuds Program**

The Global Open Reporting & Ombuds Program, comprised of hundreds of trained employees at the Corporate and business level, is a chief vehicle for the Company to hear from employees regarding any violations of our integrity standards. The program enables employees to raise concerns, including those relating to respect for human rights, confidentially and without fear of retaliation. Consistent with our Human Rights Statement of Principles, and in the spirit of “Eyes Always Open,” employees are expected to report unfair employment practices and human rights concerns they observe at GE sites or working with direct business partners.
GE is actively engaged in the Leadership Group for Responsible Recruitment, a collaboration between leading companies and expert organizations to drive positive change in the way that migrant workers are recruited, with a focus on eliminating fees being charged to workers to secure employment. The aims of this initiative are to:

1. Create demand for responsible recruitment by raising awareness about the benefits of ethical practices and developing tools to help companies implement the Employer Pays Principle.
2. Increase the supply of ethically sourced labor by creating an enabling environment and supporting the development and implementation of systems to identify and use ethical recruitment agencies.
3. Advocate for improved protection for migrant workers by brokering dialogue to promote the effective regulation and enforcement of the recruitment industry.

Conclusion

The UK Modern Slavery Act serves a significant role in driving transparency in global efforts to address the problem of modern slavery. As discussed above, GE and its businesses, including the Reporting Entities, continue to build on the Company’s longstanding human rights program to better identify and prevent forced labor in their own operations and those of their suppliers and business partners. This global scourge can only be overcome by a joint effort of states, private enterprises, and civil society. We have been and remain committed to upholding our fundamental role in this critical effort.
Appendix A

Company Name

Altair Filter Technology Group Limited
Altair Filter Technology Ltd
Altair Holdings UK Limited
BK Medical UK Limited
Blade Dynamics Tidal Energy Limited
BNR Infrastructure Co-Investment Limited
EFS Los Guindos UK Limited
EFS UK Holdings Limited
G.E. C.I.F. Trustees Ltd.
GE (Holdings)
GE Additive UK and Ireland Limited
GE Aircraft Engine Services Limited
GE Asset Management Limited
GE Aviation Systems Group Limited
GE Aviation Systems Limited
GE Aviation UK
GE Boving Himachal Pradesh Limited
GE Caledonian Limited
GE Capital Corporation (Holdings)
GE Capital EMEA Services Limited
GE CAPITAL EQUIPMENT FINANCE LTD
GE Capital Europe Limited
GE Capital Finance
GE CAPITAL FUNDING SERVICES LIMITED
GE Capital Group Services Limited
GE Capital International 1 Limited
GE Capital International 4 Limited
GE Capital International Holdings Limited
GE Capital International Investments Limited
GE Capital Investments
GE Capital Limited
GE Capital Sigma Holding Ltd
GE CIF Property Nominee Company No 1 Limited
GE CIF Property Nominee Company No 2 Limited
GE Digital Software Solutions Limited
GE Digital UK Limited
GE Energy (UK) Limited
GE Energy Power Conversion Technology Limited
GE Energy Power Conversion UK Holdings Limited
GE Energy Power Conversion UK Limited
GE Energy Services (UK) Limited
GE Financial Investments
GE Financial Markets Funding I
GE Grid Solutions (UK) Limited
GE Healthcare (AB)
GE HEALTHCARE (NMP) LIMITED
GE Healthcare Clinical Systems (UK) Limited
GE Healthcare Finnamore Limited
GE Healthcare Limited
GE Healthcare Pension Trustee Limited
GE Healthcare Structured Projects (UK) Limited
GE Healthcare UK Limited
GE Industrial Consolidation Limited
GE Industrial Finance UK Limited
GE Industrial Sterling Treasury Services
GE Industrial Treasury Holdings
GE Infrastructure Aviation
GE Infrastructure UK Limited
GE Inspection and Repair Services Limited
GE Inspection Technologies Limited
GE Intelligent Platforms (Bracknell) Limited
GE Intelligent Platforms UK Limited
GE Medical Systems Limited
GE Money Consumer Lending Limited
GE Money Home Finance Limited
GE Money Home Finance Limited
GE Money Mortgages Limited
GE Money Secured Loans Limited
GE Money Servicing Limited
GE Oil & Gas Marine & Industrial UK Ltd.
GE Pension Trustees Limited
GE Power Conversion Brazil Holdings Limited
GE Power UK
GE Smallworld
GE Steam Power Ltd
GE UK Group
GE UK Holdings
GEAPS PENSION TRUST LIMITED
GENERAL ELECTRIC ENERGY UK LIMITED
General Electric UK Holdings Ltd.
Grid Solutions HVDC India Limited
IGE Dollar Treasury Services
IGE Energy Services (UK) Limited
IGE Euro Treasury Services
IGE Sterling Treasury Services Limited
IGE USA Group
IGE USA Holdings
IGE USA Investments Limited
igroup8 limited
International General Electric (U.S.A.) Key Leasing Limited
LM Wind Power UK Limited
Monica Healthcare Limited
Oliver Crispin Robotics Limited
One GE Healthcare UK
Opus One Solutions Energy UK Limited
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<td>Pignone Engineering</td>
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