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Beatriz Balbin
Chief
Special Procedures Branch
United Nations Human Rights
Office of the High Commissioner

Karima Bennoune
Special Rapporteur in the field of cultural rights
United Nations Human Rights
Office of the High Commissioner

Ahmed Shaheed
Special Rapporteur on freedom of religion or belief
United Nations Human Rights
Office of the High Commissioner

Nils Melzer
Special Rapporteur on torture and other cruel,
inhuman or degrading treatment or punishment
United Nations Human Rights
Office of the High Commissioner

Dante Pesce
Chair-Rapporteur of the Working Group on the issue
of human rights and transnational corporations and
other business enterprises
United Nations Human Rights
Office of the High Commissioner

Fernand de Varennes
Special Rapporteur on minority issues
United Nations Human Rights
Office of the High Commissioner

Tomoya Obokata
Special Rapporteur on contemporary forms of
slavery, including its causes and consequences
United Nations Human Rights
Office of the High Commissioner

Siobhán Mullally
Special Rapporteur on trafficking in persons,
especially women and children
United Nations Human Rights
Office of the High Commissioner

RE: Joint Communication from Special Procedures on March 12, 2021

Dear Chief Balbin, Chair Rapporteur Pesce, Special Rapporteurs Bennoune, de Varennes, Shaheed, Obokata, Melzer, and Mullally:

Thank you for your letter to General Electric (GE) Chairman and CEO H. Lawrence Culp. We commend the work of the United Nations Human Rights Council and the respective Special Rapporteurs. GE prides itself on a longstanding and deeply ingrained culture of integrity and respect, which is embedded in our operations and value chain through a suite of clear standards for GE personnel and business partners, including suppliers. While your letter did not raise specific allegations with regard to GE, we were deeply troubled by the suggestion of our potential involvement with forced labor within and outside the Xinjiang Uyghur Autonomous Region (Xinjiang) in China.

Beyond our own core ethical principles, GE is keenly aware of its responsibilities regarding forced labor under applicable laws. We remain continuously attuned to the strict requirements of sanction regimes applicable to GE's global operations including in the United States, United Kingdom, European Union and Canada, as well as broader regulatory developments with respect to human rights issues. Your letter prompted an immediate review of the allegations, which was led by a team of specialist internal and external legal counsel, human rights experts, and procurement personnel,

and a third party-research firm. Our review has revealed no findings that GE or its direct suppliers are implicated in the abuse of Uyghur or other minorities in China.

Still, we recognize that the issues raised are complex and dynamic. No organization can afford to be complacent regarding forced labor. This most recent review has been just one piece of our ongoing commitment to respect human rights across our value chain, a commitment built on continuous improvement. Should your offices or other stakeholders have specific information regarding GE suppliers alleged to be involved in human rights violations in China or elsewhere, we would greatly appreciate if you could share such information with us so that we might investigate and address the issue consistent with our human rights commitments. We constantly strive to strengthen our screening process for suppliers in high-risk regions and countries, with recent initiatives including partnering with a third-party due diligence firm for greater supply chain visibility, and enhancing mechanisms for information sharing across businesses. These measures build on our rigorous human rights program and global partnerships, which are at the heart of our business and which we detail below.

We have set out below: (i) an overview of our human rights policies and standards; (ii) the training required of our own employees and our business partners; (iii) the due diligence that we undertake in relation to human rights matters; (iv) our stakeholder engagements and grievance mechanism for human rights matters; (v) the ongoing review and assessment of our human rights program, as part of the process of continuous improvement; and (vi) our commitment.

Human Rights Policies and Standards

GE respects all internationally recognized human rights in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. GE was among the first American companies to issue a [Human Rights Statement of Principles](#) reflecting our commitment, among other things, to respect fundamental labor rights including the prohibition of forced and child labor in GE operations and those of our suppliers. We periodically review and update this document based on evolving human rights expectations and our engagement with stakeholders and experts. 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.

GE business partners agree to abide by these principles by signing on to the [GE Integrity Guide for Suppliers, Contractors and Consultants](#), which requires “unyielding integrity and high standards of business conduct” of third parties with whom GE engages. Beyond compliance with all applicable local laws and regulations, the *Integrity Guide* mandates third-party adherence to GE standards in areas including Fair Employment Practices and Respectful Workplace, Environment, Health & Safety, and Human Rights, and explicitly and strictly prohibits any use of forced or child labor.

GE personnel are also bound to these standards as reflected in our code of conduct, called [The Spirit & The Letter \(“S&L”\)](#). The S&L applies equally to all our majority owned subsidiaries and affiliates and details GE’s integrity and compliance expectations including our human rights expectations of all GE directors, officers, and employees. The S&L also summarizes the company’s enterprise-wide compliance policies, including our stand-alone policy on Human Rights. The Human Rights Policy details our commitments in this space, including an overview of employee responsibilities, examples of warning signs and red flags, and clear and specific language addressing how we expect our employees to treat those who work for and with us.

Moreover, GE has implemented operational requirements for businesses, known as the Human Rights Enterprise Standard, that helps businesses identify and understand the salient human rights risks across the company and how they are expected to respond to those risks. The Enterprise Standard sets out minimum requirements that businesses must adhere to regarding risk assessment and identification, due diligence of third parties, and escalation and remediation of any concerns related to human rights. The Enterprise Standard also provides practical guidance and best practices for business implementation to mitigate human rights risk within our operations – an important element given that the Enterprise Standard requires businesses to develop a protocol for assessing their individual human rights program.

Notably, other related enterprise-wide policies and requirements, such as those related to Environmental, Health and Safety Policy (“EHS”), and Respectful Workplace Policy, are similarly embedded throughout GE’s businesses enterprise through similar enterprise standards and policy documents. Most recently, in 2020, the GE Global Human Rights Counsel established a Human Rights Working Group with representation from every business and various functions. The Working Group meets regularly to discuss the implementation of the standard and the evolving landscape of human rights issues and risks in the communities we serve.

Training

With a broad, global workforce across multiple business segments, coupled with changing workforce demographics and modes of communication, the GE program requires constant reinvention and customization by each GE business to stay relevant. GE requires employees to review and acknowledge the S&L Code of Conduct on an annual basis and, bi-annually, complete S&L refresher training. Specific training on human rights is provided to targeted employee groups based on risk. GE also reinforces these learnings through a variety of communications, including leadership messages, newsletters, integrity campaigns, videos, infographics, and embedded messaging within various digital tools. We invest in refreshed content on an ongoing basis, and business training and communication plans are adjusted annually based on the output of our enterprise compliance risk assessment.

The success of 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 gives employees an easy, efficient way to understand the core principles of human rights; Company-wide policies and programs; 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.

GE provides direct material suppliers online compliance training that includes a module explaining GE’s position on human rights, with a more 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 GE’s forced labor policy. Suppliers view this video as part of their commitment to abide by GE’s Integrity Guide, as referenced above. Based upon the business relationship, GE may conduct additional training or follow up discussions to ensure compliance expectations are understood and met.

Due Diligence

GE strives to ensure compliance with these policies through a rigorous due diligence program reaching throughout our value chain. Our multifaceted ethical supply chain program is the industry standard in global sustainability governance. GE’s Supplier Responsibility Governance (SRG) program—which has been in effect since 2002—uses a systematic approach to assess risks in our supply chain and to monitor and improve supplier performance. The program specifically prohibits

any use of forced or child labor by our suppliers and requires those suppliers to apply the same standards to their suppliers upstream. This system includes procedures for risk-based on-site audits, during which trained GE personnel visit a supplier's facilities and review its compliance with local law and GE's policies and expectations on environment, health, safety, labor, security, and human rights. We track and monitor results with a proprietary reporting tool, which is supplemented with information from regional databases. GE personnel—rigorously trained on our integrity expectations and indicators of supplier performance—conduct periodic spot-checks and audits on these records. We conduct in-person audits at supplier sites in higher-risk countries to validate compliance with our policies and assess human rights risks, including those related to forced labor. Suppliers are expected to address findings within 60 days. GE can suspend—and has suspended—purchase orders with suppliers who do not meet our integrity expectations under the contract. In 2020, despite the restrictions and impacts caused by Covid-19, GE adapted to the different ways of conducting due diligence on its supply chain partners and conducted over 1,200 such audits globally. Since the start of the SRG program, GE has conducted over 33,000 supplier assessments in over 100 countries.

Stakeholder Engagement and Grievance Mechanism

GE engages with external stakeholders to identify human rights risks throughout our value chain and to collaborate with peers, experts, and civil society groups to seek practical solutions. The GE Foundation, for instance, funded the Institute for Human Rights and Business (IHRB) Responsible Recruitment Initiative, focused on addressing modern slavery. GE also is a founding member of the Global Business Initiative on Human Rights, a cross-industry peer learning platform; a signatory to, and active member in, the UN Global Compact (including the Human Rights and Business Dilemmas Forum); and a member of the Leadership Group for Responsible Recruitment, a multi-stakeholder initiative to effect change in how vulnerable migrant workers are recruited and eliminate debt bondage.

GE further offers a best-in-class grievance process known as the GE Ombuds & Open Reporting Program, under which both employees and contractors can raise any known or suspected contraventions of our integrity standards, including human rights and labor issues. The Program uses hundreds of trained employees, known as Ombudspersons, who are the chief means by which we hear from concern raisers. Consistent with our Human Rights Statement of Principles and in the spirit of "Eyes Always Open," GE employees, contractors, and non-employees working on GE sites are expected and encouraged to report unfair employment practices and human rights concerns they observe when at GE sites or working with direct business partners. Concerned individuals may choose to speak to someone about a potential integrity issue or raise concerns in writing through a number of different channels, including anonymously. Each concern is investigated where GE measures the robustness of its open reporting using a number of key performance indicators. We track the average days it takes to close each investigation, targeting resolution within 60 days of being reported.

Ongoing Review and Program Assessment

At GE, we regularly evaluate the effectiveness of our human rights program in pursuit of continuous improvement. Last year, for instance, as a part of our ongoing review for program improvement, we engaged an external human rights expert to conduct a global human rights risk assessment across our value chain. The assessment identified ways in which we might further improve our due diligence program and we are already implementing many of those suggestions. In 2020, our Internal Audit function also conducted a detailed assessment of the risks of forced labor at various project sites to identify opportunities for further strengthening our due diligence program.

Our Commitment

The breadth and rigor of GE's human rights policies, due diligence, and stakeholder engagement evidence the sincerity of our commitment to conduct business responsibly. However, we recognize that even the best corporate human rights program cannot claim to address all human rights risks—particularly where those risks evolve and grow across an extended value chain spanning 170 countries. Where we must, we strive to prioritize by risk to stakeholders. And we commit to improve constantly so that we may live up to our cherished reputation for integrity.

We are committed to eliminating modern slavery in our business operations and supply chain. We will always continue to implement key measures for improving our modern slavery and human rights due diligence program. This work will be informed by our ongoing partnership with third party due diligence firms (including the use of proprietary technology for specialist research), who will continue to provide updates of companies with allegations or negative findings related to human rights violations. By utilizing key developments in technology and staying abreast of alleged violators of human rights, GE believes that the industry can better mitigate the risk of modern slavery entering its operations and supply chain. We are committed to continuously improving our program to respect the fundamental dignity of everyone we might affect directly through our operations, products, services, and indirectly through our business relationships around the world.

Sincerely,

Michael Holston

Senior Vice President, General Counsel & Secretary

On behalf of the General Electric Company