

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

GE AVIATION (A SUBSIDIARY OF GENERAL ELECTRIC)

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	7/8
2. Internal Controls	6	12/12
3. Support to Employees	7	11/14
4. Conflict of Interest	4	7/8
5. Customer Engagement	7	10/14
6. Supply Chain Management	5	7/10
7. Agents, Intermediaries and Joint Ventures	10	11/20
8. Offsets	3	4/6
9. High Risk Markets	4	5/8
10. State-Owned Enterprises	0	N/A
TOTAL		74/100
BAND		B

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

Question
1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?
Score
1
Comments
<p>There is evidence that the company's Code of Conduct, which outlines its stance against bribery and corruption, is authorised and endorsed by the board and the Chief Executive Officer. However, the company receives a score of '1' because there is no evidence that the company's leadership makes a direct commitment to anti-bribery and corruption.</p>
Evidence
<p>[37] Commitment To Compliance Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.1] GE Aviation's leadership is committed to the highest ethical standards in all aspects of our business and throughout the world. GE's Improper Payments Policy, which is a key element of The Spirit & The Letter, prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector. GE's commitment to anti-bribery and corruption is integral to our Integrity and Compliance Program, and reference to this commitment may be found in many of GE's foundational documents, which are publicly-facing statements of the company that reflect the views of its leadership. GE's policy</p> <p>[p.2] against improper payments was authorized and is endorsed by the Board of Directors, the Chief Executive Officer and all Company leadership, and represents a core belief in how we do business.</p> <p>[11] GE Integrity Homepage (Webpage) Accessed 25/10/2019 https://www.ge.com/sustainability/integrity</p> <p>GE infuses compliance and governance into every aspect of its business.</p> <p>We are committed to maintaining a world - class compliance culture in every GE business and everywhere we operate around the world. We recognize that our reputation for integrity and compliance is a competitive advantage, and are proud to have been honored as one of Ethisphere's World's Most Ethical Companies for 12 straight years (2007 – 2018).</p> <p>At the heart of GE's Integrity & Compliance program is The Spirit & The Letter.</p> <p>GE's commitment to performing with integrity is instilled in every employee as a nonnegotiable expectation of behavior. This expectation is propelled by our guide to integrity and compliance at GE, The Spirit & The Letter, which is underscored by an extensive system of policies, processes, training, and communications.</p>

Question
1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories: a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.
Score
2
Comments
<p>There is evidence that the company has an anti-bribery and corruption policy as part of its Code of Conduct. The company's policy clearly prohibits bribery, payments to public officials, commercial bribery and facilitation payments. There is evidence that this policy applies to all employees and board members, including non-executive directors, as well as the staff and leadership of subsidiaries and other controlled entities.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.2] GE's Improper Payments Policy, and other Compliance policies that prohibit bribery, explicitly apply to and must be followed by anyone who works for or represents GE, including GE directors, officers, leaders and employees, employees of subsidiaries and entities which GE controls, and third parties such as consultants, agents, sales representatives, distributors and independent contractors. GE Aviation implements the Improper Payments Policy through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Onboarding Due Diligence Policy, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, GE Lobbying Disclosure Policy, and GE Aviation Open Reporting and Investigation Process. To keep GE's heartbeat of integrity strong in a complex world, all GE employees and representatives are required to have a basic understanding of The Spirit & The Letter and learn the details of policies relevant to their responsibilities, including the Improper Payments Policy, be aware of integrity and compliance in their daily activities and decisions, and be committed to upholding the highest of ethical standards and having the confidence to raise concerns or ask questions to ensure we all do the right thing in the right way.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf <p>[p.5] The Spirit & The Letter must be followed by anyone who works for or represents GE.</p> <p>THIS INCLUDES >></p> <ul style="list-style-type: none"> • GE directors, officers and employees. • Subsidiaries and controlled affiliates. Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies. <p>[p.10] IMPROPER PAYMENTS</p> <p>RULE TO REMEMBER >> Do not permit or engage in bribery or corruption of any kind.</p> <p>What You Should Know</p> <p>Bribery means giving, offering or promising anything of value to gain an improper business advantage.</p> <p>Facilitation payments are small customary amounts paid to government employees to expedite routine clerical or administrative actions such as issuing permits.</p> <p>OUR POLICY</p> </p> </p>

GE prohibits bribery in all business dealings, in every country around the world, with both governments and the private sector.

GE prohibits even small facilitation payments to expedite routine administrative actions, except in extraordinary circumstances and with the prior approval of a GE compliance or business general counsel, or where an employee's safety or security is at stake. Our goal is to eliminate all facilitation payments.

We maintain strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on GE's behalf in business dealings.

We maintain accurate books, records, and accounts that correctly reflect the true nature of all transactions.

YOUR ROLE

- Never offer, promise, make, or authorize a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.
- Remember that providing gifts, entertainment or anything else of value to government employees is highly regulated and often prohibited. Do not provide such gifts and entertainment unless you have received prior GE counsel approval.

[p.14] WORKING WITH GOVERNMENTS

RULE TO REMEMBER >> Never take shortcuts when dealing with government — be transparent, always comply.

OUR POLICY

GE follows the highest ethical standards in conducting business with governments.

GE commits to comply with all contract terms and conditions, laws, and regulations applicable to GE when working with governments.

We must be truthful and accurate when dealing with governments.

We maintain controls and procedures that target our government business activities specifically to ensure compliance in this highly regulated environment.

- After award, perform all contract obligations strictly in accordance with the terms of the agreement. For example, do not make any substitutions for the goods and services to be delivered, or deviate from requirements, without the written approval of the authorized government official.
- Do not offer, promise, make or authorize the giving of anything of value to a government employee that is inconsistent with Corporate and business guidelines.

[11] GE Integrity Homepage (Webpage)

Accessed 25/10/2019

<https://www.ge.com/sustainability/integrity>

GE's policy against improper payments in business transactions is a key element of The Spirit & The Letter and represents a core belief in how we do business.

GE's approach to compliance in this critical area is multifaceted. GE's policy against improper payments in business transactions is a key element of The Spirit & The Letter and represents a core belief in how we do business. Among its key features are: policies and procedures, controls, investigation and remediation, training, due diligence, and Corporate Audit Staff support.

[15] 2019 Proxy Statement (Document)

Accessed 28/10/2019

https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf

[p.25] Board Integrity Policies

CODE OF CONDUCT.

All directors, officers and employees of GE must act ethically at all times and in accordance with GE's code of conduct (contained in the company's integrity policy, The Spirit & The Letter). Under the Board's Governance Principles, the Board does not permit any waiver of any ethics policy for any director or executive officer. The Spirit & The Letter, and any amendments to the code that we are required to disclose under SEC rules, are posted on GE's website

[p.28] COMPLIANCE & INTEGRITY

Effective compliance depends on culture and leadership. We view our reputation for integrity and compliance as a competitive and recruiting advantage, and we expect our leaders from the top down to create a culture of compliance. We are committed to an open reporting environment in which employees are encouraged to promptly raise concerns without fear of retaliation. Our integrity policy, The Spirit & The Letter, details the expectations of everyone who works for or represents GE, in specific areas such as improper payments, working with governments, competition law, international trade compliance, cybersecurity and privacy and fair employment practices.

[3] Jan 2019 Anti-Corruption Fact Sheet (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf

[p.1] Anticorruption

GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.

GE's approach to compliance in this critical area is multifaceted. Among its key features are:

- Corporate policies and procedures that reflect the Company's approach by prohibiting improper payments in every transaction, whether with a government or with a private party

[...]

- Heightened attention to key risk areas such as gifts and entertainment, travel and living expenses, donations, and facilitating payments

[...]

The Importance of Strong Anticorruption Compliance Greater attention is being paid to the effectiveness of corporate compliance programs in preventing improper payments. The Justice Department and the SEC have issued a resource guide on the US Foreign Corrupt Practices Act (FCPA) that endorses a strong compliance program. The UK Bribery Act and the US Sentencing Guidelines similarly highlight the need for a strong program. As part of the compliance program at GE, operating with a strong anti-corruption program is a critical component in how we do business.

[p.2] The Company is firmly committed to ethical behavior in all of our business practices.

[4] Governance Principles (Document)

Accessed 25/10/2019

https://www.ge.com/investor-relations/sites/default/files/Governance_Principles_05_21_19.pdf

[p.2] 3. Qualifications Directors should possess the highest personal and professional ethics, integrity and values, and be committed to representing the long-term interests of the shareowners

[p.6] 12. Ethics and Conflicts of Interest The board expects GE directors, as well as all officers and employees, to act ethically at all times and to acknowledge their adherence to the policies comprising GE's code of conduct set forth in the Company's integrity manual, "The Spirit & The Letter".

[...]

The board will not permit any waiver of any ethics policy for any director or executive officer.

Question
1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?
Score
2
Comments
<p>There is evidence that a designated board committee – the Audit Committee – is responsible for providing oversight of the company's anti-corruption programme. There is evidence that the Audit Committee's oversight responsibilities include reviewing reports from management on the programme's performance, along with the results of audits, and there is evidence that it has the authority to ensure that any required changes are made.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.3] GE's Board of Directors has oversight for risk management at GE, including all elements of GE's Integrity and Compliance Program such as anti-bribery and corruption. The Board's Audit Committee assists the Board in its oversight of the integrity of the financial statements of the Company, of the Company's compliance with legal and regulatory requirements, of the independence and qualifications of the independent auditor and of the performance of the Company's internal audit function and independent auditors.</p> <p>The Audit Committee is tasked to review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies, including regular review of compliance processes and programs in general and the corporate ombudsman process in particular. The Audit Committee's process builds upon management's risk assessment and mitigation processes, which include reviews of compliance under The Spirit & The Letter, laws and regulations, the company's Integrity and Compliance Program, financial reporting and controllership.</p> <p>[p.5] GE Aviation's anti-bribery and corruption programs are subject to regular internal and external audits to ensure they are consistent with best practices and business risks facing the company. The Audit Committee is tasked to review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies, including an annual review of the Company's operations and regular review of compliance processes and programs in general and the corporate ombudsman process in particular. At least once a year, the Audit Committee will review and discuss with the</p> <p>[p.6] General Counsel regulatory, compliance and litigation risks facing the company, including the anti-bribery and corruption program. The Audit Committee's process builds upon management's risk assessment and mitigation processes, which include reviews of compliance under The Spirit & The Letter, laws and regulations, the company's Integrity and Compliance Program, financial reporting and controllership. Management may also order audits of particular risk areas, including anti-bribery and corruption, as appropriate to respond to concerns, gaps, or emerging risks. Company policies and procedures are regularly updated to mitigate any gaps identified during audits.</p> <p>[4] Governance Principles (Document) Accessed 25/10/2019 https://www.ge.com/investor-relations/sites/default/files/Governance_Principles_05_21_19.pdf</p> <p>[p.2] 2. Functions of Board</p> <p>The board of directors typically has six scheduled meetings a year at which it reviews and discusses the performance of the Company, its plans and prospects, as well as immediate issues facing the Company. Directors are expected to attend all scheduled board and committee meetings and the Annual Meeting of Shareowners. In addition to its general oversight of management, the board also performs a number of specific functions, including:</p> <p>[...]</p> <p>d. assessing major risks facing the Company — and reviewing options for their mitigation; and e. ensuring processes are in place for maintaining the integrity of the Company - the integrity of the financial statements, the</p>

integrity of compliance with law and ethics, the integrity of relationships with customers and suppliers, and the integrity of relationships with other stakeholders

[15] 2019 Proxy Statement (Document)

Accessed 28/10/2019

https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf

[p.21] Audit

[...]

Key Oversight Responsibilities

- Independent auditor engagement
- Financial reporting and accounting standards
- Internal audit functions
- Disclosure and internal controls
- Enterprise risk management
- Compliance and integrity programs

[p.23] AUDIT COMMITTEE

Oversees risks related to:

- policies and processes relating to the financial statements, financial reporting processes, regulatory, compliance and litigation risks and auditing
- the company's enterprise risk management program and risk assessment

Management

The Board's risk oversight process builds upon management's risk assessment and mitigation processes, which include reviews of strategic and operational planning; executive development and evaluation; compliance under the company's code of conduct, The Spirit & The Letter, laws and regulations; the company's integrity programs; health, safety and environmental compliance; financial reporting and controllership; and information technology and cybersecurity programs.

[12] Audit Committee Charter (Document)

Accessed 27/10/2019

https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf

[p.2] The purpose of the committee shall be to assist the board in its oversight of the integrity of the financial statements of the Company, of the Company's compliance with legal and regulatory requirements, of the independence and qualifications of the independent auditor and of the performance of the Company's internal audit function and independent auditors. The committee's role shall include assistance with such oversight as it relates to GE's financial services business (GE Capital), although responsibility for the oversight of financing offered through GE Capital and related risk considerations will be shared with the board's Finance and Capital Allocation Committee. The committee has an oversight role, and, in fulfilling that role, it relies on the reviews and reports noted below. In furtherance of this purpose, the committee shall have the following authority and responsibilities:

[p.4] 12. To review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies. This should include regular reviews of compliance processes and programs in general and the corporate ombudsman process in particular. In connection with these reviews, the committee will meet, as deemed appropriate, with the general counsel and other Company officers or employees.

Question
1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?
Score
2
Comments
<p>There is evidence that the General Counsel has ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme. It is clear that this person has a direct reporting line to the board, as well as to the board-level Audit Committee responsible for oversight of such activities. There is evidence of reporting and feedback activities between the General Counsel and the board as part of the company's reporting structure.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.4] GE's Senior Vice President, General Counsel & Secretary ("GC") is a member of GE's Board of Directors, reports directly to GE's CEO, and leads the company's global compliance and ethics organizations which include antibribery and corruption programs. The GC is a senior executive with ultimate responsibility for implementing and managing the company's anti-bribery and corruption program. The GC also meets at least annually with the Audit Committee to review and discuss compliance and legal risks. The GC is assisted in these efforts by the GE Chief Compliance Officer.</p> <p>[29] General Counsel Profile (Webpage) Accessed 28/10/2019 https://www.ge.com/about-us/leadership/profiles/mike_holston Mike Holston Senior Vice President, General Counsel & Secretary Appointed April 2018 Mike Holston is Senior Vice President, General Counsel and Secretary, of GE. In this role, Mike leads the company's global legal, compliance and ethics, corporate secretary and environment health & safety organizations.</p> <p>[12] Audit Committee Charter (Document) Accessed 27/10/2019 https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf [p.4] 12. To review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies. This should include regular reviews of compliance processes and programs in general and the corporate ombudsman process in particular. In connection with these reviews, the committee will meet, as deemed appropriate, with the general counsel and other Company officers or employees.</p>

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
2
Comments
<p>There is evidence that the company has a formal bribery and corruption risk assessment procedure in place that informs the design of its anti-bribery and corruption programme. There is evidence that the results of risk assessments are reviewed by the board-level Audit Committee that oversees the programme. There is also evidence that the results of such reviews are used to develop tailored mitigation plans and to update specific parts of the company's anti-bribery and corruption programme.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.4] The GC also meets at least annually with the Audit Committee to review and discuss compliance and legal risks.</p> <p>[...]</p> <p>The design and implementation of GE's Corporate antibribery and corruption program, and the implementation of that program by GE Aviation, is tailored to the particularized risk of corruption and bribery the Company faces. GE Aviation maintains strong controls aimed at preventing, detecting, and responding to any bribery or corruption. These controls include formal bribery and corruption risk assessment procedures</p> <p>[...]</p> <p>GE Aviation reviews anti-bribery and corruption risk assessments at least annually and updates them when gaps are identified.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf <p>[p.7] GE holds its leaders accountable for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation. Leaders' responsibilities span prevention, detection and response to compliance issues.</p> <p>[...]</p> <p>Implement control measures such as "dashboards" and "scorecards" to detect heightened compliance risks and violations.</p> <p>[...]</p> <p>Take prompt corrective action to address identified compliance weaknesses.</p> <p>[15] 2019 Proxy Statement (Document) Accessed 28/10/2019 https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf <p>[p.23] AUDIT COMMITTEE</p> </p> </p></p>

Oversees risks related to:

- policies and processes relating to the financial statements, financial reporting processes, regulatory, compliance and litigation risks and auditing
- the company's enterprise risk management program and risk assessment

[...]

Management

The Board's risk oversight process builds upon management's risk assessment and mitigation processes, which include reviews of strategic and operational planning; executive development and evaluation; compliance under the company's code of conduct, The Spirit & The Letter, laws and regulations; the company's integrity programs; health, safety and environmental compliance; financial reporting and controllership; and information technology and cybersecurity programs.

[11] GE Integrity Homepage (Webpage)

Accessed 25/10/2019

<https://www.ge.com/sustainability/integrity>

Elements of Our Program

To ensure the Integrity & Compliance program is evolving as new risks emerge, GE relies on a team of experts and digital tools to help us stay ahead of significant compliance risks. With changing workforce demographics and modes of communication, our program requires constant reinvention to stay relevant for a global community.

Assessment

Data is increasingly important in how we work. Systems, processes, and business risk assessments result in data that can yield ongoing insights into our program's health. For example, we use a gifts & hospitality monitoring program to track trends and flags regarding spend and type of recipient.

Question
2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?
Score
2
Comments
<p>There is evidence that the company's entire anti-corruption programme is subject to a regular audit process to ensure the programme is consistent with best practice and the business risks facing the company. There is evidence that the company conducts annual internal audits, supplemented by external audits, on a regular basis. There is evidence that the Audit Committee reviews audit findings on an annual basis, and that the company's management are tasked with implementing required changes identified through audits.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.5] GE Aviation's anti-bribery and corruption programs are subject to regular internal and external audits to ensure they are consistent with best practices and business risks facing the company. The Audit Committee is tasked to review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies, including an annual review of the Company's operations and regular review of compliance processes and programs in general and the corporate ombudsman process in particular. At least once a year, the Audit Committee will review and discuss with the ...</p> <p>[p.6] ... General Counsel regulatory, compliance and litigation risks facing the Company, including the anti-bribery and corruption program. The Audit Committee's process builds upon management's risk assessment and mitigation processes, which include reviews of compliance under The Spirit & The Letter, laws and regulations, the company's Integrity and Compliance Program, financial reporting and controllership. Management may also order audits of particular risk areas, including anti-bribery and corruption, as appropriate to respond to concerns, gaps, or emerging risks. Company policies and procedures are regularly updated to mitigate any gaps identified during audits.</p> <p>[11] GE Integrity Homepage (Webpage) Accessed 25/10/2019 https://www.ge.com/sustainability/integrity Elements of Our Program</p> <p>To ensure the Integrity & Compliance program is evolving as new risks emerge, GE relies on a team of experts and digital tools to help us stay ahead of significant compliance risks. With changing workforce demographics and modes of communication, our program requires constant reinvention to stay relevant for a global community.</p> <p>Assessment</p> <p>Data is increasingly important in how we work. Systems, processes, and business risk assessments result in data that can yield ongoing insights into our program's health. For example, we use a gifts & hospitality monitoring program to track trends and flags regarding spend and type of recipient.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf [p.7] GE holds its leaders accountable for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation. Leaders' responsibilities span prevention, detection and response to compliance issues.</p> <p>Lead compliance processes through compliance review boards. Conduct periodic compliance reviews with the assistance of business compliance leaders and/or the Corporate Audit Staff. Implement control measures such as "dashboards" and "scorecards" to detect heightened compliance risks and violations.</p>

[...]

Take prompt corrective action to address identified compliance weaknesses.

[3] Jan 2019 Anti-Corruption Fact Sheet (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf

[p.1] Anticorruption

GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.

GE's approach to compliance in this critical area is multifaceted. Among its key features are:

- Strategic use of Corporate Audit Staff to identify and assess potential improper payment

[12] Audit Committee Charter (Document)

Accessed 27/10/2019

https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf

[p.2] The purpose of the committee shall be to assist the board in its oversight of the integrity of the financial statements of the Company, of the Company's compliance with legal and regulatory requirements, of the independence and qualifications of the independent auditor and of the performance of the Company's internal audit function and independent auditors. The committee's role shall include assistance with such oversight as it relates to GE's financial services business (GE Capital), although responsibility for the oversight of financing offered through GE Capital and related risk considerations will be shared with the board's Finance and Capital Allocation Committee. The committee has an oversight role, and, in fulfilling that role, it relies on the reviews and reports noted below. In furtherance of this purpose, the committee shall have the following authority and responsibilities:

[p.4] 12. To review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies. This should include regular reviews of compliance processes and programs in general and the corporate ombudsman process in particular. In connection with these reviews, the committee will meet, as deemed appropriate, with the general counsel and other Company officers or employees.

[15] 2019 Proxy Statement (Document)

Accessed 28/10/2019

https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf

[p.23] AUDIT COMMITTEE

Oversees risks related to:

- policies and processes relating to the financial statements, financial reporting processes, regulatory, compliance and litigation risks and auditing
- the company's enterprise risk management program and risk assessment
- the annual audit plan for the company's internal audit function, prioritizing audit focus areas based on their potential risk

Management

The Board's risk oversight process builds upon management's risk assessment and mitigation processes, which include reviews of strategic and operational planning; executive development and evaluation; compliance under the company's code of conduct, The Spirit & The Letter, laws and regulations; the company's integrity programs; health, safety and environmental compliance; financial reporting and controllership; and information technology and cybersecurity programs.

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
2
Comments
<p>There is evidence that the company publicly commits to investigating incidents promptly and objectively, and that it has a specific procedure in place to deal with whistleblowing cases. The company provides information on its investigative procedure with documentation and actions to be taken at each step, from receipt to final outcome. The company commits to informing whistleblowers of the outcome of investigations, if they so wish.</p> <p>In addition, there is evidence that all investigations are handled by independent teams. There is evidence that the company's Corporate Ombudsperson's Office gathers and reviews summary information on investigations and that this body submits reports on investigations to the company's Audit Committee on a regular basis.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.6] The GE Board of Directors has established a robust Ombuds program for receiving and handling complaints or concerns about the Company's conduct, including bribery and corruption allegations or incidents. GE's Ombuds program provides multiple whistleblowing and reporting channels (discussed below), and GE tracks, investigates and responds to complaints or concerns raised through such channels using a proprietary digital tool. GE examines integrity concerns, including bribery and corruption allegations or incidents, fairly, promptly, independently, and objectively. GE Aviation implements the Corporate Ombuds and investigative processes through the proprietary GE Aviation Open Reporting and Investigation Process.</p> <p>[...]</p> <p>GE is committed to examining every integrity concern, including bribery and corruption allegations or incidents, fairly, promptly, independently, and objectively. GE Aviation implements the Corporate Ombuds and investigative ...</p> <p>[p.7] ... processes through the proprietary GE Aviation Open Reporting and Investigation Process. During the investigation process, GE forms an objective investigation team, determines the facts through interviews and/or the review of documents, recommends corrective actions if necessary, and provides the person who raised the original concern (if that person is known) with feedback on the outcome.</p> <p>[16] Governance (Webpage) Accessed 28/10/2019 https://www.ge.com/investor-relations/governance</p> <p>Because the Board receives a significant number of these communications, they are initially processed by the GE Corporate Ombudsperson's Office, which acknowledges receipt to the person submitting the communication. The Corporate Ombudsperson's Office supplies any such communication that relates to accounting, internal accounting controls or auditing matters (or a summary) directly to the Chairman of the Audit Committee. The Corporate Ombudsperson's Office also regularly provides copies or summaries of other communications directly to directors depending on the nature of the issues or concerns raised.</p> <p>With respect to all other communications, the Corporate Ombudsperson's Office provides regular reports to the Audit Committee and GE's lead director at least four times a year. These reports summarize the communications by subject matter and frequency, and break out significant concerns. The reports also include a summary of the status of significant matters that are under review or investigation in response to a concern. This approach ensures that concerns are raised to the directors in an effective manner that accurately informs them of the nature and frequency of the concerns.</p>

[1] GE Code of Conduct (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf

[p.7] WHAT LEADERS MUST DO

GE holds its leaders accountable for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation. Leaders' responsibilities span prevention, detection and response to compliance issues.

[...]

Document and escalate any employee's expressed concern through the appropriate channels.

[p.8] HOW WE HANDLE INTEGRITY CONCERNS

GE fairly examines every integrity concern, and managers are required to escalate employees' concerns to a compliance specialist. During the investigation process,

GE: 1. Forms an objective investigation team.

2. Determines the facts through interviews and/or the review of documents.

3. Recommends corrective action, if necessary.

4. Provides the person who raised the original concern (if that person is known) with feedback on the outcome.

[3] Jan 2019 Anti-Corruption Fact Sheet (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf

[p.1] Anticorruption

GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.

GE's approach to compliance in this critical area is multifaceted. Among its key features are:

[...]

- Prompt investigation and remediation of any concerns

Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
2
Comments
<p>There is evidence that the company assures itself of the quality of its internal investigations, including those reported through whistleblowing channels. The company indicates that the staff conducting investigations are properly qualified and trained to perform this function. There is some evidence that the company has a procedure for handling complaints about the investigation process; the company states that concerns are raised to an appropriate higher level for review. In addition, there is evidence that investigations are conducted under the Corporate Ombudsman programme, which is subject to an annual review.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.5] The Audit Committee is tasked to review and investigate any matters pertaining to the integrity of management or adherence to standards of business conduct as required in Company policies, including an annual review of the company's operations and regular review of compliance processes and programs in general and the corporate ombudsman process in particular.</p> <p>[p.6] The GE Board of Directors has established a robust Ombuds program for receiving and handling complaints or concerns about the Company's conduct, including bribery and corruption allegations or incidents. GE's Ombuds program provides multiple whistleblowing and reporting channels (discussed below), and GE tracks, investigates and responds to complaints or concerns raised through such channels using a proprietary digital tool. GE examines integrity concerns, including bribery and corruption allegations or incidents, fairly, promptly, independently, and objectively. GE Aviation implements the Corporate Ombuds and investigative processes through the proprietary GE Aviation Open Reporting and Investigation Process.</p> <p>[...]</p> <p>GE is committed to examining every integrity concern, including bribery and corruption allegations or incidents, fairly, promptly, independently, and objectively. GE Aviation implements the Corporate Ombuds and investigative ...</p> <p>[p.7] ... processes through the proprietary GE Aviation Open Reporting and Investigation Process. During the investigation process, GE forms an objective investigation team, determines the facts through interviews and/or the review of documents, recommends corrective actions if necessary, and provides the person who raised the original concern (if that person is known) with feedback on the outcome. Staff tasked with conducting investigations are qualified and trained to perform the function, and any complaints about the handling of concerns and investigations are raised to an appropriate higher level for review.</p> <p>[15] 2019 Proxy Statement (Document) Accessed 28/10/2019 https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf [p.21] Board Committees</p> <p>[...]</p> <p>Audit</p> <p>[...]</p> <p>Key Priorities for 2018</p> <p>[...]</p> <ul style="list-style-type: none"> • Oversight of significant litigation and investigations

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
2
Comments
<p>There is evidence that the company commits to report significant findings from ethics and corruption investigations to board via the Audit Committee. In addition, there is evidence that company's General Counsel is responsible for ensuring that the disclosure of criminal offences to relevant authorities is evaluated and acted upon if necessary.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.7] As part of GE's Corporate Ombuds and investigative process, the Audit Committee has established procedures for the receipt, retention, and treatment of complaints received by the company regarding accounting, internal accounting controls or auditing matters, and the confidential, anonymous submission by GE employees of concerns regarding questionable accounting or auditing matters. All such complaints that could materially affect financial reporting or controls will be sent directly to the chair of the Audit Committee. All such complaints will be tracked on a separate board of directors' Ombuds docket, but handled by the company's Ombuds, finance and legal staffs in the normal manner, except as the Audit Committee may request. The status of such complaints will be reported to the chair of the Audit Committee and if he or she so directs, to the committee or the full board. The Audit Committee chair may request special treatment, including the retention of outside counsel or other advisors, for any complaint addressed to him or her. GE's integrity manual prohibits any employee from retaliating or taking any adverse action against anyone for raising or helping to resolve an integrity concern.</p> <p>Likewise, GE Aviation procedures assure an appropriate senior individual is responsible for ensuring that the ...</p> <p>[p.8] ... disclosure of criminal offenses to relevant authorities is evaluated and acted upon appropriately. GE Aviation has a policy relating to the handling of integrity concerns, which would include concerns that may have involved potentially criminal conduct. That policy and concomitant process for execution may result in GE reporting findings and results of its investigations to government agencies, when appropriate, with the approval of the GE Aviation Vice President & General Counsel, who is a senior member of GE Aviation's executive leadership team. This may include, but is not limited to, timely disclosure to, and full cooperation with, any relevant government agency.</p> <p>[16] Governance (Webpage) Accessed 28/10/2019 https://www.ge.com/investor-relations/governance Contact the Board</p> <p>All comments, concerns and complaints can be sent to the Board via phone, e-mail or post, and will be addressed by the Audit Committee or GE Ombudsperson's Office.</p> <p>[...] Because the Board receives a significant number of these communications, they are initially processed by the GE Corporate Ombudsperson's Office, which acknowledges receipt to the person submitting the communication. The Corporate Ombudsperson's Office supplies any such communication that relates to accounting, internal accounting controls or auditing matters (or a summary) directly to the Chairman of the Audit Committee. The Corporate Ombudsperson's Office also regularly provides copies or summaries of other communications directly to directors depending on the nature of the issues or concerns raised.</p> <p>With respect to all other communications, the Corporate Ombudsperson's Office provides regular reports to the Audit Committee and GE's lead director at least four times a year. These reports summarize the communications by subject matter and frequency, and break out significant concerns. The reports also include a summary of the status of significant matters that are under review or investigation in response to a concern. This approach ensures that concerns are raised to the directors in an effective manner that accurately informs them of the nature and frequency of the concerns.</p>

[1] GE Code of Conduct (Document)

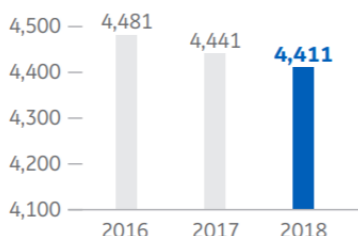
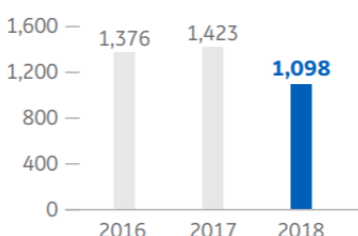
Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf

[p.8] GE offers several channels for raising concerns. You can choose to speak to someone about a potential integrity issue or put it in writing. Generally, your supervisor or manager will be in the best position to resolve an integrity concern, but other resources include:

- Your human resources leader.
- Your compliance leader or auditor.
- Company legal counsel.
- Next level of management.
- Your business or region GE ombudsperson or integrity helpline.
- A GE Corporate ombudsperson.
- The GE Board of Directors.

Nothing in this policy prevents you from reporting potential violations of law to relevant government authorities.

Question																
2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?																
Score																
2																
Comments																
There is evidence that the company publishes high-level data from bribery and corruption-related incidents and investigations involving company employees at all levels. This includes the number of reports received, information about the number of investigations launched and the number of disciplinary actions as a result of investigation findings. There is evidence that the company publishes and updates this data on an annual basis.																
Evidence																
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.7] GE publishes high-level results from incident investigations, including for improper payments (bribery or corruption-related investigations), and disciplinary actions against employees at all levels.</p> <p>[15] 2019 Proxy Statement (Document) Accessed 28/10/2019 https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf [p.28] COMPLIANCE & INTEGRITY</p>																
<p>KEY INDICATORS</p> <div><div><p>OPEN REPORTING POLICY CONCERNS REPORTED</p><table><tr><th>Year</th><th>Concerns Reported</th></tr><tr><td>2016</td><td>4,481</td></tr><tr><td>2017</td><td>4,441</td></tr><tr><td>2018</td><td>4,411</td></tr></table></div><div><p>DISCIPLINARY ACTIONS IN RESPONSE^(a)</p><table><tr><th>Year</th><th>Disciplinary Actions</th></tr><tr><td>2016</td><td>1,376</td></tr><tr><td>2017</td><td>1,423</td></tr><tr><td>2018</td><td>1,098</td></tr></table></div></div> <p>(a) Actions in response to closed matters through January 2019. Actions correspond to year in which concern was reported, not necessarily year action was taken.</p> <p>We view the number of concerns reported through our internal open reporting program (including, in some circumstances, increases in the number of concerns reported) as one of the best indicators of the GE culture of integrity. When employees report integrity concerns, they make GE stronger and help prevent small issues from becoming problems.</p>	Year	Concerns Reported	2016	4,481	2017	4,441	2018	4,411	Year	Disciplinary Actions	2016	1,376	2017	1,423	2018	1,098
Year	Concerns Reported															
2016	4,481															
2017	4,441															
2018	4,411															
Year	Disciplinary Actions															
2016	1,376															
2017	1,423															
2018	1,098															
<p>[11] GE Integrity Homepage (Webpage) Accessed 25/10/2019 https://www.ge.com/sustainability/integrity A hallmark of GE's compliance program is a steadfast commitment to a vibrant, well-publicized and effective "open reporting environment."</p> <p>Employees are encouraged to raise integrity concerns and to feel confident that they can do so without fear of retaliation. GE employees remain the Company's first and best line of defense in the early detection of potential compliance issues.</p>																

During 2017, more than 4,440 integrity concerns were reported, leading to 1,423 disciplinary actions as of March, 2018.

[39] Environmental Social and Governance Results 2019 (Document)

Accessed 08/04/2020

https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2018_r11_Sep2019.pdf

[p.1]



2018 Environmental, Social, and Governance Results

Indicator	Baseline	2016	2017	2018	Discussion
Workforce (a)					
U.S. and Canada	--	--	--	103	Workforce changes reflect the transformation of our business portfolio to focus on our core businesses.
EMEA	--	--	--	96	
Asia	--	--	--	61	
Latin America	--	--	--	23	
Total (thousands)	--	295	313	283	
Philanthropy (o)					
GE Company Contributions via GE Businesses and to the Foundation (\$M)	--	119.4	93.6	90.7	GE Foundation, the philanthropic organization of GE, is committed to transforming our communities and shaping the diverse workforce of tomorrow.
Employee and Retiree Contributions matched by GE Foundation (\$M)	--	52.1	47.3	38.8	Total Contributions as a Percentage of GE Revenue is a new metric in 2018 to align with Chief Executives for Corporate Purpose Giving in Numbers annual survey.
Total GE "Family" Giving (\$M)	--	171.5	140.9	129.5	
Total Contributions as a Percentage of GE Revenue (\$M) (b)	--	0.10%	0.08%	0.07%	
Governance (c)					
Ombudsperson Concerns by Area (reports per policy):					In today's environment, GE employees remain the Company's first and best line of defense in the early detection of potential compliance issues. GE has hundreds of ombudspersons around the globe to encourage the reporting of concerns without fear of retaliation.
Fair Employment Practices	--	957	1,028	1,094	
Conflicts of Interest	--	451	417	465	
International Trade Compliance	--	132	146	125	
Securing GE Operations Globally	--	166	181	146	
Regulatory Excellence	--	175	204	251	
Business Records (T&L, Time & Attendance)	--	295	377	279	
Environment, Health & Safety	--	264	232	284	
Measurements	--	335	296	273	
Supplier Relationships	--	436	415	347	
Improper Payments	--	130	104	68	
Cybersecurity/Privacy	--	265	241	266	
Controllershship (Accounting, Financial Reporting, Billing)	--	219	224	180	
Intellectual Property	--	252	217	333	
Theft	--	76	90	84	
Working with Governments	--	47	46	23	
Competition Law	--	84	86	51	
Violation of Law	--	43	22	25	
Other Integrity Concerns (d)	--	144	115	117	
Total Concerns Reported (e)	--	4,481	4,441	4,411	
Disciplinary Actions (f)	--	1,376	1,423	1,098	
Investigations Conducted, U.S. and Canada (% Total)	--	33%	33%	35%	
Investigations Conducted, EMEA (% Total)	--	33%	31%	21%	
Investigations Conducted, Asia (% Total)	--	18%	20%	23%	
Total)	--	17%	17%	14%	

3. Support to Employees

Question
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
Score
1
Comments
<p>There is evidence that the company provides training for its employees that outlines the basic principles of its anti-bribery and corruption policy, as well as providing details of the whistleblowing options available. There is evidence that the company provides this training to all employees across all divisions and countries of operation, and in all appropriate languages. The company indicates that all employees receive this training during the onboarding process.</p> <p>Although the company states that employees receive clear communications on anti-corruption in annual and quarterly meetings, there is no publicly available evidence that employees are required to refresh their training on the company's anti-bribery and corruption programme and whistleblowing options on a regular basis or every three years.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.8] GE Aviation provides training to employees on The Spirit & The Letter, including specific training on GE's Improper Payments Policy and anti-bribery and corruption programs. All employees, across all divisions and geographies, are required to receive live and/or electronic training during onboarding, on The Spirit & The Letter, site specific codes of conduct, and/or collectively-bargained codes of conduct, in their appropriate language. In addition, the GE Aviation Chief Executive Officer re-emphasizes The Spirit & The Letter to all employees at least annually, the GE Aviation Chief Compliance Officer addresses employees at every quarterly leadership meeting, and all exempt employees must ...</p> <p>[p.9] ... acknowledge at least annually that they have read and continue to understand The Spirit & The Letter.</p> <p>[11] GE Integrity Homepage (Webpage) Accessed 25/10/2019 https://www.ge.com/sustainability/integrity Training & Communications</p> <p>GE uses a focused training & communications plan to educate employees about the risks and policies they need to be aware of. GE reinforces these learnings via leadership communications and embedded messaging within various applications.</p> <p>[3] Jan 2019 Anti-Corruption Fact Sheet (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf</p> <p>[p.1] Anticorruption</p> <p>GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.</p> <p>GE's approach to compliance in this critical area is multifaceted. Among its key features are:</p> <p>[...]</p>

- Extensive training of GE employees on improper payments

[1] GE Code of Conduct (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf

[p.4] Fulfill your obligation to be the Voice of Integrity and promptly report any concerns you have about compliance with law, GE policy or this Code.

[p.6] WHAT EMPLOYEES MUST DO

BE KNOWLEDGEABLE

Gain a basic understanding of The Spirit & The Letter policies. Learn the details of any Spirit & Letter policy that is relevant to your individual job responsibilities. Learn about your detailed business and regional policies and procedures and understand how to apply them to your job.

[...]

[p.8] BE THE VOICE OF INTEGRITY

Being the Voice of Integrity at GE isn't always easy, but when we raise integrity concerns, we make our Company stronger and protect our colleagues from harm. You do not need to be certain that a violation has occurred. At the same time, you have an obligation to promptly raise a concern when you see a situation in which our integrity principles or policies are not being followed. Confidentiality is respected, and you may even choose to remain anonymous. However, if you identify yourself, we are able to follow up with you and provide feedback.

Question
3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees: a) Employees in high risk positions, b) Middle management, c) Board members.
Score
2
Comments
<p>There is evidence that the company provides tailored training on its anti-bribery and corruption programme to employees based on the different levels of risk facing those in different roles. There is evidence that the company provides tailored training to employees in high risk positions, as well as for middle management and board members. The company indicates that all categories of employees must refresh their training regularly or at least annually, and states that middle management must certify their understanding of the Code of Conduct on an annual basis.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.9] GE Aviation provides tailored anti-bribery and corruption training to employees in various roles as determined by risk. All new salaried employees, which includes all middle management and employees in high risk positions, receive targeted online training on The Spirit & The Letter, including specific training on GE's Improper Payments Policy and anti-bribery and corruption programs. In addition, business compliance leaders assign advanced online Improper Payments training for specific employees based on job function. Certain employees in heightened-risk roles additionally receive in-person training focused on specific functions.</p> <p>Board members too receive tailored trainings. In addition, the GE Aviation Chief Executive Officer re-emphasizes The Spirit & The Letter to all employees at least annually, the GE Aviation Chief Compliance Officer addresses employees at every quarterly leadership meeting, and all exempt employees (which would include roles considered middle management) must acknowledge at least annually that they have read and continue to understand The Spirit & The Letter.</p> <p>[5] Ethical Supply Chain Program (Document) Accessed 27/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33731_Ethical_Supply_Chain_Program_r1.pdf [p.2] Supplier Assessments</p> <p>Almost all of our on-site assessments are conducted in developing countries, and use more than 1,000 local, trained GE employees or trained and qualified partners that can both inspect conditions and coach for improvement. All GE personnel who interact with supplier facilities, regardless of their role or expertise, are expected to participate in awareness training on GE's supplier expectations, human rights issues and on-site due diligence requirements.</p> <p>[3] Jan 2019 Anti-Corruption Fact Sheet (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf [p.1] Anticorruption</p> <p>[...]</p> <ul style="list-style-type: none"> • Extensive controls, including thorough due diligence, careful screening and training on GE policies for third-party intermediaries such as distributors, service providers, and commercial agents and representatives <p>[...]</p>

- Extensive training of GE employees on improper payments

[11] GE Integrity Homepage (Webpage)

Accessed 25/10/2019

<https://www.ge.com/sustainability/integrity>

Training & Communications

GE uses a focused training & communications plan to educate employees about the risks and policies they need to be aware of. GE reinforces these learnings via leadership communications and embedded messaging within various applications.

Question
3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?
Score
2
Comments
<p>There is evidence that the company measures and reviews the effectiveness of its anti-corruption training programme. There is evidence that the company has a system in place to do this, through an annual employee survey and regular monitoring and assessments of the programme. The company indicates that it undertakes such reviews on at least an annual basis, and there is evidence that the results are used to update specific parts of its anti-bribery and corruption communications and training programme.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.8] In addition, the GE Aviation Chief Executive Officer re-emphasizes The Spirit & The Letter to all employees at least annually, the GE Aviation Chief Compliance Officer addresses employees at every quarterly leadership meeting, and all exempt employees must ...</p> <p>[p.9] ... acknowledge at least annually that they have read and continue to understand The Spirit & The Letter.</p> <p>[p.10] GE Aviation reviews compliance risks comprehensively, including those related to improper payments, through an annual risk assessment process. By that process, a risk focal reviews information from across the compliance program related to the risk area, including information about concerns reported in the space, confirmation rates, and trends. The focal, who is an attorney who is dedicated exclusively to this area within the Compliance function, evaluates and recommends mitigation accordingly, which may include, among other things, training and communication in this area.</p> <p>Through this process, GE Aviation's anti-bribery and corruption risk assessments are updated at least annually and its anti-corruption and training programs are likewise updated when gaps are identified. GE Aviation also conducts an annual survey of exempt employees about its Integrity and Compliance Program, which includes anti-bribery and corruption, to measure and review its effectiveness. This annual process's consideration of compliance-related inquiries and concerns, their outcome, and other factors in this space, as well as its dedicated staff working in this risk area, allow GE Aviation to continuously monitor and measure the effectiveness and implementation rates of its formal anti-bribery and corruption training programs.</p>

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company's incentive schemes for employees incorporate anti-bribery and corruption principles. The company indicates that where employees receive performance-based pay, such incentives are calculated based on performance appraisals which include a qualitative assessment of the employee's behaviours in line with the company's Code of Conduct. The company states that per deal incentives are uncommon but that where such incentives are provided they are designed to discourage corrupt practices.</p> <p>The company receives a score of '1' because there is no clear evidence that it adjusts its incentive schemes to account for employees in high risk positions and ensures that incentives are proportionate to the employee's base salary in such cases.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.10] To the extent GE Aviation employees receive performance-based pay as part of their overall compensation, it is generally based upon overall business or sub-business performance metrics and individual contributions to pre-determined criteria such as performance appraisals and workplace conduct and conformance with The Spirit & The Letter which include a commitment to ethical conduct.</p> <p>While awards are based on financial metrics, they are also subject to an additional qualitative assessment, focused on risk management and the level of compliance, and the company reserves the right to adjust award amounts and bonus in its discretion based on these and other factors. Payment of per deal sales incentives is uncommon, and in instances where a portion of compensation is tied to a particular deal, the incentives are designed in a way that would discourage corrupt practices. Further, bribery and corruption are strictly prohibited, actively monitored, and are not tolerated.</p> <p>[4] Governance Principles (Document) Accessed 25/10/2019 https://www.ge.com/investor-relations/sites/default/files/Governance_Principles_05_21_19.pdf <p>[p.7] 16. Compensation of the Board The governance and public affairs committee shall have the responsibility for recommending to the board compensation and benefits for independent directors. In discharging this duty, the committee shall be guided by the following goals: compensation should fairly pay directors for work required in a company of GE's size and scope; compensation should align directors' interests with the long-term interests of shareowners; and the structure of the compensation should be simple, transparent and easy for shareowners to understand. In implementing these goals, the committee will adhere to the following practices, with specific compensation amounts to be determined following the review by the board, based on the recommendation of the committee:</p> <p>[...]</p> <p>18. Annual Compensation Review of Senior Management The management development and compensation committee has primary responsibility for assisting the board in developing and evaluating potential candidates for executive positions, including the CEO, and for overseeing the development of executive succession plans. As part of this responsibility, the committee oversees the design, development and implementation of the compensation program for the CEO and other officers at the senior vice president level and above. The committee evaluates the performance of the CEO and determines CEO compensation in light of the goals and objectives of the compensation program. The CEO and the committee together assess the performance of officers at the senior vice president level and above and determine their compensation, based on initial recommendations from the CEO.</p> </p> </p>
Question

3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
2
Comments

There is evidence that the company publicly commits to protect and support any employee who refuses to act unethically, in keeping with the company's anti-corruption commitments, even where such actions may result in a loss of business or another disadvantage to the company. There is evidence that the company assures itself of its employees' confidence in this commitment through anonymised surveys.

Evidence
[37] Commitment To Compliance (Document)

Accessed 08/04/2020

<https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf>

[p.11] GE Aviation is committed to protect and support its employees who refuse to act unethically, even where those actions result in a loss of business or other disadvantage to the company. The Spirit & The Letter makes clear that GE employees are expected to be the voice of integrity and promptly report any concerns about compliance with law, GE policy or the Code of Conduct. GE Aviation regularly highlights "Compliance Champions" who choose to be the voice of integrity.

GE Aviation's compliance function also conducts an annual anonymous compliance culture survey among exempt employees to receive feedback on their feelings on various dimensions of the program, including their awareness of ethical issues in their area and ability to report concerns. Data concerning the volume and types of concerns raised through the ombuds program are also metrics that the Compliance function considers in assessing employee confidence in its commitment to open reporting and ethical conduct. GE likewise provides multiple whistleblowing and advice channels for use by all, including GE employees and external parties, and they allow for confidential and anonymous reporting. The Spirit & The Letter summarizes these Open Reporting options and explains that personnel may raise an integrity concern. Confidentiality is respected, and reporting individuals may choose to remain anonymous. GE Aviation regards its employees' active use of the systems for reporting concerns--most of which in recent years are not reported anonymously--to be an indicator of their confidence in the system and GE Aviation's assurances to those who raise concerns. In that regard, GE Aviation regularly tracks both the volume of concerns that are raised and the proportion of them that are not raised anonymously. GE Aviation does so because it recognizes that these metrics may be indicative of the program's health in its employees' eyes.

[1] GE Code of Conduct (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf

[p.8] BE THE VOICE OF INTEGRITY

Being the Voice of Integrity at GE isn't always easy, but when we raise integrity concerns, we make our Company stronger and protect our colleagues from harm. You do not need to be certain that a violation has occurred. At the same time, you have an obligation to promptly raise a concern when you see a situation in which our integrity principles or policies are not being followed. Confidentiality is respected, and you may even choose to remain anonymous. However, if you identify yourself, we are able to follow up with you and provide feedback.

Question
3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?
Score
2
Comments
<p>There is evidence that the company promotes a policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents, including those engaged by the group as third parties, suppliers and joint venture partners. There is evidence that the company seeks to assure itself of its employees' confidence in the commitment through monitoring the usage statistics of whistleblowing channels and employee surveys.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.11] GE has a clear policy of non-retaliation against employees who raise integrity concerns, including whistleblowers and employees who report bribery and corruption incidents. The Spirit & The Letter makes clear that confidentiality is respected, and employees may choose</p> <p>[p.12] to remain anonymous when reporting integrity concerns. When an employee chooses to be identified, the employee's identity and information is only shared with relevant individuals involved in the Ombuds or investigative process on a "need-to-know" basis. Any retaliation—whether direct or indirect—against employees who raise a concern is strictly prohibited and grounds for discipline up to and including dismissal.</p> <p>GE Aviation's compliance function also conducts an annual anonymous compliance culture survey among exempt employees to receive feedback on their feelings on various dimensions of the program, including their awareness of ethical issues in their area and ability to report concerns. Data concerning the volume and types of concerns raised through the ombuds program are also metrics that the Compliance function considers in assessing employee confidence in its commitment to open reporting and ethical conduct. GE likewise provides multiple whistleblowing and advice channels for use by all, including GE employees and external parties, and they allow for confidential and anonymous reporting.</p> <p>The Spirit & The Letter summarizes these Open Reporting options and explains that personnel may raise an integrity concern. Confidentiality is respected, and reporting individuals may choose to remain anonymous. GE Aviation regards its employees' active use of the systems for reporting concerns--most of which in recent years are not reported anonymously--to be an indicator of their confidence in the system and GE Aviation's assurances to those who raise concerns. In that regard, GE Aviation regularly tracks both the volume of concerns that are raised and the proportion of them that are not raised anonymously. GE Aviation does so because it recognizes that these metrics may be indicative of the program's health in its employees' eyes.</p> <p>[11] GE Integrity Homepage (Webpage) Accessed 25/10/2019 https://www.ge.com/sustainability/integrity</p> <p>A hallmark of GE's compliance program is a steadfast commitment to a vibrant, well-publicized and effective "open reporting environment."</p> <p>Employees are encouraged to raise integrity concerns and to feel confident that they can do so without fear of retaliation. GE employees remain the Company's first and best line of defense in the early detection of potential compliance issues.</p> <p>[15] 2019 Proxy Statement (Document) Accessed 28/10/2019 https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf</p> <p>[p.28] COMPLIANCE & INTEGRITY</p>

Effective compliance depends on culture and leadership. We view our reputation for integrity and compliance as a competitive and recruiting advantage, and we expect our leaders from the top down to create a culture of compliance. We are committed to an open reporting environment in which employees are encouraged to promptly raise concerns without fear of retaliation.

[1] GE Code of Conduct (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf

[p.6] The following examples of conduct can result in disciplinary action.

EXAMPLES >> Violating law or GE policy or requesting that others do the same. Retaliating against another employee for reporting an integrity concern.

[p.7] GE holds its leaders accountable for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation.

[p.8] Your identity and information will only be shared on a “need-to know” basis. Any retaliation — whether direct or indirect — against employees who raise a concern is grounds for discipline up to and including dismissal.

[2] Integrity Guide for Suppliers Contractors and Consultants (Document)

Accessed 27/10/2019

<http://www.gesupplier.com/html/SuppliersIntegrityGuide/download/GE%20Integrity%20Guide%20for%20Suppliers-EN.pdf>

[p.1] The General Electric Company (“GE”) is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with GE suppliers, contractors, consortium partners and consultants (collectively “Suppliers”).

[p.2] How to Raise a Question or Concern

III. GE Policy forbids retaliation against any person reporting such a concern.

[15] 2019 Proxy Statement (Document)

Accessed 28/10/2019

https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf

[p.28] COMPLIANCE & INTEGRITY

Effective compliance depends on culture and leadership. We view our reputation for integrity and compliance as a competitive and recruiting advantage, and we expect our leaders from the top down to create a culture of compliance. We are committed to an open reporting environment in which employees are encouraged to promptly raise concerns without fear of retaliation. Our integrity policy, The Spirit & The Letter, details the expectations of everyone who works for or represents GE, in specific areas such as improper payments, working with governments, competition law, international trade compliance, cybersecurity and privacy and fair employment practices.

[...] We view the number of concerns reported through our internal open reporting program (including, in some circumstances, increases in the number of concerns reported) as one of the best indicators of the GE culture of integrity. When employees report integrity concerns, they make GE stronger and help prevent small issues from becoming problems.

Question
3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?
Score
1
Comments
<p>There is evidence that the company provides both whistleblowing and advice channels for its employees to report concerns and seek advice on its anti-bribery and corruption programme. There is evidence these channels allow for confidential and anonymous reporting. The company indicates that these channels are available to all employees in all locations and in multiple languages, including those engaged as third parties, suppliers and joint venture partners.</p> <p>However, the company receives a score of '1' because there is no evidence that it provides an external channel for employees to report concerns or incidents, such as an independently-operated hotline.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.12] GE provides multiple whistleblowing and advice channels for use by all, including GE employees and external parties, and they allow for confidential and anonymous reporting. United States Government agency fraud hotline posters or Department of Homeland Security (DHS) fraud hotline posters are prominently displayed in common areas of GE Aviation facilities when contractually required.</p> <p>[p.13] The posters are also available on the GE Aviation Compliance and Integrity website via the intranet. The Spirit & The Letter summarizes the GE Open Reporting options and explains that personnel may raise an integrity concern through several channels, including their manager, their human resources (HR) leader, their compliance leader or auditor, Company legal counsel, a next level of management, Corporate, business or regional Ombuds, the Integrity helpline, and the GE Board of Directors.</p> <p>Confidentiality is respected, and reporting individuals may choose to remain anonymous. These reporting channels are available and accessible to employees in each country where the employees are employed and in multiple languages.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>[p.4] Fulfill your obligation to be the Voice of Integrity and promptly report any concerns you have about compliance with law, GE policy or this Code.</p> <p>[p.6] BE COMMITTED</p> <p>Promptly raise any concerns about potential violations of law or GE policy.</p> <p>Cooperate fully and honestly in GE investigations related to integrity concerns.</p> <p>[p.7] GE holds its leaders accountable for creating a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation. Leaders' responsibilities span prevention, detection and response to compliance issues.</p> <p>[...]</p> <p>Document and escalate any employee's expressed concern through the appropriate channels.</p> <p>[p.8] BE THE VOICE OF INTEGRITY</p>

Being the Voice of Integrity at GE isn't always easy, but when we raise integrity concerns, we make our Company stronger and protect our colleagues from harm. You do not need to be certain that a violation has occurred. At the same time, you have an obligation to promptly raise a concern when you see a situation in which our integrity principles or policies are not being followed. Confidentiality is respected, and you may even choose to remain anonymous. However, if you identify yourself, we are able to follow up with you and provide feedback.

Your identity and information will only be shared on a "need-to know" basis. Any retaliation — whether direct or indirect — against employees who raise a concern is grounds for discipline up to and including dismissal.

HOW TO RAISE AN INTEGRITY CONCERN

GE offers several channels for raising concerns. You can choose to speak to someone about a potential integrity issue or put it in writing. Generally, your supervisor or manager will be in the best position to resolve an integrity concern, but other resources include:

- Your human resources leader.
- Your compliance leader or auditor.
- Company legal counsel.
- Next level of management.
- Your business or region GE ombudsperson or integrity helpline.
- A GE Corporate ombudsperson.
- The GE Board of Directors.

Nothing in this policy prevents you from reporting potential violations of law to relevant government authorities.

Raise a concern

GE Corporate Ombudsperson

The GE ombudsperson process allows you to voice your integrity questions and concerns, anonymously if you prefer.

PO Box 52560
Boston, MA 02205
U.S.A

800-227-5003 (U.S.A. only) or (1) 617-443-3077
ombudsperson@corporate.ge.com

GE Board of Directors

You can report concerns about GE's accounting, internal accounting controls or auditing matters, as well as other concerns, to the Board of Directors or the Audit Committee.

GE Board of Directors
General Electric Company
41 Farnsworth Street
Boston, MA 02210 U.S.A.
800-417-0575 (U.S.A. only) or
(1) 617-443-3078
directors@corporate.ge.com

[2] Integrity Guide for Suppliers Contractors and Consultants (Document)

Accessed 27/10/2019

<http://www.gesupplier.com/html/SuppliersIntegrityGuide/download/GE%20Integrity%20Guide%20for%20Suppliers-EN.pdf>

[p.1] A Message from GE

The General Electric Company ("GE") is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with GE suppliers, contractors, consortium partners and consultants (collectively "Suppliers").

[...]

Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in this Guide and in other contractual obligations to GE. Please contact the GE manager you work with or any GE Compliance Resource if you have any questions about this Guide or the standards of business conduct that all GE Suppliers must meet.

[p.2] How to Raise a Question or Concern

Subject to local laws and any legal restrictions applicable to such reporting, each GE Supplier is expected to inform GE promptly of any concern related to this Guide affecting GE, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence.

GE Suppliers also must take such steps as GE may reasonably request to assist GE in the investigation of any such occurrence involving GE and the Supplier.

If Supplier's work is related to a U.S. government contract, Supplier must notify GE of any alleged non-conformance with this Supplier Integrity Guide.

I. Define your question/concern: Who or what is the concern? When did it arise? What are the relevant facts? II. Prompt reporting is crucial — a question or concern may be raised by a GE Supplier as follows:

- By discussing with a cognizant GE Manager;

OR

- By calling the GE Integrity Helpline: +1 800-227-5003 or +1 617-443-3077;

OR

- By emailing ombudsperson@corporate.ge.com

OR

- By contacting any Compliance Resource (e.g., GE legal counsel or auditor).

[11] GE Integrity Homepage (Webpage)

Accessed 25/10/2019

<https://www.ge.com/sustainability/integrity>

A hallmark of GE's compliance program is a steadfast commitment to a vibrant, well-publicized and effective "open reporting environment."

Employees are encouraged to raise integrity concerns and to feel confident that they can do so without fear of retaliation. GE employees remain the Company's first and best line of defense in the early detection of potential compliance issues.

[16] Governance (Webpage)

Accessed 28/10/2019

<https://www.ge.com/investor-relations/governance>

Contact the Board

All comments, concerns and complaints can be sent to the Board via phone, e-mail or post, and will be addressed by the Audit Committee or GE Ombudsperson's Office.

Call GE's Board

+1 800 417 0575

+1 617 443 3078

Write to GE's Board

GE Board of Directors

General Electric Company

41 Farnsworth Street
Boston, MA 02210

Email GE's Board

directors@corporate.ge.com

Because the Board receives a significant number of these communications, they are initially processed by the GE Corporate Ombudsperson's Office, which acknowledges receipt to the person submitting the communication. The Corporate Ombudsperson's Office supplies any such communication that relates to accounting, internal accounting controls or auditing matters (or a summary) directly to the Chairman of the Audit Committee. The Corporate Ombudsperson's Office also regularly provides copies or summaries of other communications directly to directors depending on the nature of the issues or concerns raised.

With respect to all other communications, the Corporate Ombudsperson's Office provides regular reports to the Audit Committee and GE's lead director at least four times a year. These reports summarize the communications by subject matter and frequency, and break out significant concerns. The reports also include a summary of the status of significant matters that are under review or investigation in response to a concern. This approach ensures that concerns are raised to the directors in an effective manner that accurately informs them of the nature and frequency of the concerns.

4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
2
Comments
<p>There is evidence that the company formally addresses conflicts of interest as a corruption risk, and that it has a policy that defines conflicts of interest, including actual, potential and perceived conflicts. The company's policy clearly addresses possible conflicts arising from personal employee relationships, government relationships, financial interests and outside employment. There is evidence that this policy applies to all employees and board members, including those of subsidiaries and other controlled entities.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.13] GE's Conflicts of Interest Policy, which is a key element of The Spirit & The Letter, defines conflicts of interest— actual, potential and perceived—and applies to all employees and board members. The policy requires all employees to make business decisions based on the best interest of GE, not what may be best for them personally. It also specifically advises that should a GE employee seek to undertake work with federal, state, or local governments, whether elected or appointed, the employee should first check with their business' legal counsel and human resources office to assure they are complying with current conflict-of-interest laws as well as GE procedures.</p> <p>Further, GE's Working with Governments Policy, also a key element of The Spirit & The Letter, defines conflicts of interest related to government employment. It provides that GE complies with all applicable laws and regulations and follows the highest ethical standards in conducting business with governments. This policy makes clear that GE employees should never enter into discussions with government employees or people close to them about prospective employment while they can influence decisions affecting GE. GE Aviation implements the Working With Governments Policy through various proprietary procedures, including the Hiring From the Government Implementing Procedure, GE Political Contributions Policy, and GE Lobbying</p> <p>[p.14] Policy. These procedures ensure compliance with applicable ethics and conflict of interest laws and regulations regarding recruitment, retention, compensation, or employment present or former Government employees.</p> <p>[...]</p> <p>All GE employees have a duty to disclose if their personal or financial activities may interfere or have the potential of interfering with their allegiance toward the company.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf <p>[p.5] WHO SHOULD FOLLOW THESE POLICIES</p> <p>The Spirit & The Letter must be followed by anyone who works for or represents GE.</p> <p>THIS INCLUDES >></p> <ul style="list-style-type: none"> • GE directors, officers and employees. </p> </p>

- Subsidiaries and controlled affiliates. Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies.

Non-controlled affiliates should be encouraged to adopt and follow GE compliance policies.

GE employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors must:

- Require these parties to agree to comply with relevant aspects of GE's compliance policies.

[p.11] SUPPLIER RELATIONSHIPS

[...]

YOUR ROLE

- Avoid potential conflicts of interest when you select a supplier, and never accept improper gifts or other items of value.

[p.22] CONFLICTS OF INTEREST

RULE TO REMEMBER >> Always make business decisions based on what is best for GE, never what is best for you personally.

OUR POLICY

You have a duty to ensure that nothing interferes with your ability to make all business decisions in the best interest of GE. This means that nothing you do should interfere, or appear to interfere, with your responsibility for objective and unbiased decision-making on behalf of the Company.

No activity at work or home should harm GE's reputation or good name. You have a duty to disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward the Company.

You have a duty to disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward the Company.

Misusing GE resources or influence is prohibited. Even when nothing wrong is intended, the perception of a conflict of interest may have negative effects.

YOUR ROLE

[...]

- Obtain prior approval from your manager, HR and Company legal counsel before hiring, promoting or directly supervising a family member or close friend.
- Obtain prior approval before accepting officer or director positions with an outside business or not-forprofit organization. This excludes religious or school (non- University) affiliations.
- Disclose financial interests you may have in a company where you could personally affect GE's business with that company.
- Do not accept gifts other than those of nominal value from suppliers, customers or competitors.
- Do not accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your GE peers.
- While incidental use may be acceptable, do not use GE resources, intellectual property, time or facilities for personal gain. Avoid any activity which creates the potential perception of a conflict between your personal interests and the interests of GE.

What You Should Know

A conflict of interest is not necessarily a violation of GE policy; failing to promptly disclose a conflict is always a violation.

Disclosing potential conflicts of interest allows your management team to mitigate risks which may influence your business decisions. You can access the COI disclosure tool at integrity.ge.com.

[4] Governance Principles (Document)

Accessed 25/10/2019

https://www.ge.com/investor-relations/sites/default/files/Governance_Principles_05_21_19.pdf

[p.2] Directors who also serve as CEOs of public companies or in equivalent positions should not serve on more than two boards of public companies in addition to the GE board, and other directors should not serve on more than four other boards of public companies in addition to the GE board.

[p.6] 12. Ethics and Conflicts of Interest

The board expects GE directors, as well as all officers and employees, to act ethically at all times and to acknowledge their adherence to the policies comprising GE's code of conduct set forth in the Company's integrity manual, "The Spirit & The Letter". GE will not make any personal loans or extensions of credit to directors or executive officers. No independent director may provide personal services for compensation to GE, other than in connection with serving as a GE director. The board will not permit any waiver of any ethics policy for any director or executive officer.

Question
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
Score
2
Comments
<p>There is evidence that the company has procedures in place to identify, declare and manage conflicts of interest, including actual, potential and perceived conflicts. The company indicates that employee declarations are reviewed by a "designated risk leader" along with relevant managers, Human Resources (HR) and the legal counsel, while the Governance and Public Affairs Committee reviews any potential conflicts involving directors. There is evidence that employee and director declarations are held in a dedicated online register. The company provides some examples of criteria for recusals and there is evidence that disciplinary measures apply if the policy is breached.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.14] GE has procedures in place to identify, declare and manage conflicts of interest, which are overseen by individuals who are ultimately accountable for the appropriate management and handling of conflict of interest cases. All GE employees have a duty to disclose if their personal or financial activities may interfere or have the potential of interfering with their allegiance toward the company.</p> <p>GE Aviation implements the GE Conflicts of Interest Policy through the proprietary GE Aviation Managing Personal Relationships & Conflicts of Interest Procedure. Conflict of Interest Questionnaires completed by GE Aviation employees are reviewed by a designated risk leader, who engages with managers, Human Resources (HR), and Company legal counsel as appropriate to determine whether a conflict exists and an appropriate mitigation plan for confirmed conflicts. As part of The Spirit & The Letter, violation of the conflict of interest policy is subject to discipline up to and including termination. GE manages disclosure of actual, potential or perceived conflicts of interest electronically using a proprietary eConflicts of Interest survey tool (eCOI) available in 15 languages on GE's intranet.</p> <p>Employee and officer eCOI disclosures are accessible to and reviewed by designated compliance leaders who work with legal counsel and other experts as needed to determine if a disclosure presents a conflict of interest and, if so, will either (i) provide directions on how to reduce the risk of a conflict of interest or (ii) prohibit the outside activity if the risk cannot be sufficiently reduced. Also, in accordance with GE's Governance Principles, the Governance and Public Affairs Committee (GPAC) of the Board shall resolve any actual or potential conflicts of interest that arise for directors.</p> <p>[p.15] All such disclosures are documented in the minutes of the GPAC meetings.</p> <p>[4] Governance Principles (Document) Accessed 25/10/2019 https://www.ge.com/investor-relations/sites/default/files/Governance_Principles_05_21_19.pdf</p> <p>[p.2] When a director's principal occupation or job responsibilities change significantly during his or her tenure as a director, that director shall tender his or her resignation for consideration by the governance and public affairs committee. The governance and public affairs committee will recommend to the board the action, if any, to be taken with respect to the resignation.</p> <p>[p.6] 12. Ethics and Conflicts of Interest</p> <p>[...]</p> <p>a. If an actual or potential conflict of interest arises for a director, the director shall promptly inform the chairman/CEO and the lead director. The governance and public affairs committee shall resolve any such</p>

conflicts. If a significant conflict exists and cannot be resolved, the director should resign. All directors will recuse themselves from any discussion or decision affecting their personal, business or professional interests.

- b. The governance and public affairs committee shall resolve any conflict of interest question involving the CEO, a vice chairman or a senior vice president, and the CEO shall resolve any conflict of interest issue involving any other officer of the Company.

[8] Governance and Public Affairs Committee Charter (Document)

Accessed 27/10/2019

https://www.ge.com/investor-relations/sites/default/files/GPAC_Charter_May_2019.pdf

[p.2] The purpose of the committee shall be to assist the board in identifying qualified individuals to become board members, in determining the composition of the board of directors and its committees, in monitoring a process to assess board effectiveness, in developing and implementing the Company's corporate governance principles and practices, in overseeing risks related to the Company's governance structure and processes and risks arising from related party transactions, and in overseeing the Company's positions on corporate social responsibilities and public issues of significance which affect investors and other key stakeholders.

In furtherance of this purpose, the committee shall have the following authority and responsibilities:

[...]

8. To review, at least annually, the application of GE's Conflicts of Interest policy to the Company's directors and executive officers and to resolve any conflicts of interest involving a director, the CEO, a vice chairman, or a senior vice president.

[1] GE Code of Conduct (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf

[p.22] CONFLICTS OF INTEREST

RULE TO REMEMBER >> Always make business decisions based on what is best for GE, never what is best for you personally.

OUR POLICY

[...]

You have a duty to disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward the Company.

YOUR ROLE

- Obtain prior approval from your manager, HR and Company legal counsel before hiring, promoting or directly supervising a family member or close friend.
- Obtain prior approval before accepting officer or director positions with an outside business or not-forprofit organization. This excludes religious or school (non- University) affiliations.
- Disclose financial interests you may have in a company where you could personally affect GE's business with that company.

What You Should Know

A conflict of interest is not necessarily a violation of GE policy; failing to promptly disclose a conflict is always a violation.

Disclosing potential conflicts of interest allows your management team to mitigate risks which may influence your business decisions. You can access the COI disclosure tool at integrity.ge.com.

[p.16] How We Are Changing the Board

The Governance & Public Affairs Committee (the Governance Committee) is charged with reviewing the composition of the Board and refreshing it as appropriate. With this in mind, the committee continuously reviews potential candidates and recommends nominees to the Board for approval.

[...]

GOVERNANCE COMMITTEE

- Reviews qualifications & expertise, tenure, regulatory requirements & cognitive diversity
- Reviews independence & potential conflicts

[15] 2019 Proxy Statement (Document)

Accessed 28/10/2019

https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf

[p.21] Governance & Public Affairs [Committee]

Key Oversight Responsibilities

- Director recruitment
- Board committee structure and membership
- Annual Board self-evaluation
- Conflict-of-interest reviews

[p.25] Board Integrity Policies

CONFLICTS OF INTEREST.

All directors are required to recuse themselves from any discussion or decision affecting their personal, business or professional interests. If an actual or potential conflict of interest arises, the director is required to promptly inform the CEO and the lead director. The Governance Committee reviews any such conflict of interest. If any significant conflict cannot be resolved, the director involved is expected to resign.

Question
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
Score
1
Comments
<p>There is evidence that the company has a policy which includes controls to assess and regulate employment and offers of employment or consultancy engagement to public officials. This policy prohibits employees from entering into employment discussions with government officials or individuals from the public sector while they can influence decisions relating to the company. In addition, there is evidence that the company has a policy to implement a cooling-off period of one to two years depending on the circumstance, in line with the mandatory requirements in a particular jurisdiction.</p> <p>However, the company receives a score of '1' because there is no clear evidence that it conducts a review of actual, potential or perceived conflicts of interest when any former government employees join the company, nor is it clear that the company may place restrictions on their activities if such conflicts are identified. It is noted that the company has a 'Hiring From the Government Implementing Procedure' which may contain more information, but this is not publicly available.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.15] GE has a policy and procedure regulating the appointment of directors, employees and consultants from the public sector. GE's Working With Governments Policy, which is a key element of The Spirit & The Letter, provides that GE complies with all applicable laws and regulations and follows the highest ethical standards in conducting business with governments. This policy makes clear that GE employees should never enter into discussions with government employees or people close to them about prospective employment while they can influence decisions affecting GE.</p> <p>GE Aviation implements the Working With Governments Policy through various proprietary procedures, including the Hiring From the Government Implementing Procedure, GE Political Contributions Policy, and GE Lobbying Policy. These procedures ensure compliance with applicable ethics and conflict of interest laws and regulations regarding recruitment, retention, compensation, or employment present or former Government employees.</p> <p>The Hiring From the Government Implementing Procedure provides specific guidance that a former government employee cannot be interviewed or hired before expiration of any mandatory cooling off period. It also provides a specific example of the United States government's mandatory 1 to 2-year cooling off period for senior government employees. It also notes that cooling off periods are different across jurisdictions and requires consultation with the local GE Hiring From Government contact for country-specific guidance on cooling off periods.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf [p.14] OUR POLICY</p> <p>[...]</p> <ul style="list-style-type: none"> • Never enter into discussions with government employees or people close to them about prospective employment of non-employees while they can influence decisions affecting GE.

Question
4.4. Does the company report details of the contracted services of serving politicians to the company?
Score
2
Comments
The company publishes a clear statement that it does not currently engage any serving politicians contracted as consultants. There is evidence that this statement accounts for the most recently reported financial year.
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.16] GE conducts due diligence prior to retaining consultants and avoids contracting the services of serving politicians. GE Aviation does not have any serving politicians contracted as consultants. This information is current as of February 2020.</p>

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
<p>Based on publicly available information, there is evidence that the company has a policy on corporate political contributions. The company indicates that it may make political contributions in line with its policy and with prior approval from the Corporate Government Affairs department, a company officer or the GE counsel. There is evidence that the company has criteria in place for donations and that a dedicated board-level committee – the Governance and Public Affairs Committee – is responsible for overseeing all political spending and any associated activities. In addition, there is evidence that the company is associated with a Political Action Committee (PAC) in the United States, which is overseen by a committee of employees from different business divisions.</p> <p>Since the company does not prohibit political donations and is associated with a PAC, it receives a score of '0' in line with the scoring criteria.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.12] GE has clearly defined policies and procedures covering political contributions. The GE Political Contributions Policy permits political contributions only where legal and appropriate and prohibits contributions based on the personal preferences of individual Company leaders. GE bases any political contribution decisions on what we believe supports strong public policy, promotes sustainable growth and robust markets and—at the same time—promotes innovation and the interests of the industries in which GE operates. GE Aviation implements the GE Political Contributions Policy through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Controllership Policy, GE Travel & Living Policy, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, and GE Aviation Open Reporting and Investigation Process.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf [p.10] OUR POLICY</p> <p>[...] Never contribute Company funds or other GE assets for political purposes without obtaining prior approval from Corporate Government Affairs, a Company officer or GE counsel, as applicable.</p> <p>[p.14] OUR POLICY</p> <p>[...] In the U.S., certain employees must pre-approve personal political contributions for compliance with state and local “pay to play” laws. These employees are officers, directors, sales employees and their managers of GE businesses that seek U.S. state or local government contracts. If you are unsure whether you must pre-clear personal political contributions, contact your legal counsel or compliance leader.</p> <p>[3] Jan 2019 Anti-Corruption Fact Sheet (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf [p.1] GE’s approach to compliance in this critical area is multifaceted. Among its key features are:</p>

- Corporate policies and procedures that reflect the Company's approach by prohibiting improper payments in every transaction, whether with a government or with a private party
- [...]
- Heightened attention to key risk areas such as gifts and entertainment, travel and living expenses, donations, and facilitating payments

[10] Political Contributions Policy (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33643_Political_Contributions_Policy_r2.pdf

[p.1] GE primarily supports candidates through contributions from the General Electric Political Action Committee (GEPAC) and occasionally through Company contributions, where legal and appropriate under state and local law. GE and GEPAC make contributions on a bipartisan basis to political candidates and initiatives that support strong public policy, promote sustainable growth and robust markets, and promote innovation and the interests of the industries in which GE operates. In making contributions, we naturally evaluate a candidate's position on issues of concern to the Company. Our contributions are not based on the personal preferences of individual Company leaders. We base our contribution decisions on the best interests of the Company, on what we believe is sound public policy and, in the United States, on what we believe to be the best interests of the United States.

Among the factors that we consider in determining which candidates and initiatives to support, GE and GEPAC representatives balance the views promoted by a candidate, the quality and effectiveness of the candidate or organization to which the contribution is made, and the appropriateness of the level of involvement of GE in an election. The following factors are among those considered:

- Whether the candidate represents a state or district within which a GE business operates or is located;
- Whether the candidate sits on a committee that addresses legislation affecting GE businesses or the global economy;
- The candidate's elected political leadership position, committee standing, and voting record on business and policy issues germane to the company; and
- The personal characteristics of the candidate (including the candidate's integrity and effectiveness).

Oversight

As part of its oversight role in public policy and corporate social responsibility, the Governance and Public Affairs Committee of the Board of Directors annually reviews the Company's policies and practices related to political contributions, contributions to campaigns, and contributions to trade associations and other tax-exempt and similar organizations that may engage in political activity. The committee also receives and reviews, semiannually, reports on the Company's political spending, including political contributions and contributions to trade associations and other tax-exempt and similar organizations that may engage in political activity. Each year, the committee approves a contributions budget in advance and issues a report on the Company's political spending.

[p.2] State and Local Contributions

US law prohibits companies from contributing to candidates for federal office, but many states allow corporate contributions to state and local candidates, committees, political organizations, and ballot-issue campaigns. As described in GE's code of conduct—The Spirit & The Letter—any contribution of Company funds or other assets for political purposes in the United States must be approved in advance by GE's President, Government Affairs & Policy. Our compliance counsel works to ensure that contributions comply with the spirit and letter of applicable laws and regulations. Political contributions made with Company funds outside the United States also must be approved by GE's President, Government Affairs & Policy.

GE's foreign political contributions are currently limited to Canada. GE believes it is important for our employees to be informed about public policy issues and, consistent with applicable law, will not take any adverse employment action against an employee based on his or her personal political affiliation or lawful political activity.

Our Corporate Oversight Board comprises designated senior executives within the Company, including GE's Senior Vice President & General Counsel, and GE's Senior Vice President & Chief Financial Officer. The board meets as needed to review Company expenditures and ensure that controls are in place for compliance with our political spending policies, and that the expenditures and activities advance GE's objectives. Our political contributions are overseen by a multi-functional team made up of senior executives and representatives from Government Affairs & Policy, Legal, Finance, and other related functions. The state government affairs manager, corporate finance manager, government compliance counsel, and President, Government Affairs & Policy, review and approve all corporate political contributions. Contributions of more than \$5,000 may not be made without the approval of the Corporate Oversight Board. The recipients of our donations are detailed in our bi-annual political contributions report. In 2018, the Company made no contributions using corporate funds.

Associations

As one of the largest and most diverse companies in the world, GE belongs to many associations and coalitions in which we work with our industry partners and represent our Company's interests. In some cases, these associations and coalitions engage in advocacy at the state and federal levels. While we generally agree with the positions the associations take on public policy issues, membership in a particular trade association does not indicate agreement with all of the association's views. Occasionally, these associations take positions that differ from ours. In those cases, we engage with the associations to express our views. Each year, GE will inquire and make a reasonable effort to obtain information about what portion of the company's dues or payments were used for lobbying expenditures or political contributions from those associations where our dues and other expenditures total \$50,000 or more. Each year, GE will disclose a list of U.S. trade associations receiving more than \$50,000 in annual contributions from GE or one of its majority-owned subsidiaries. For each of the aforementioned trade associations, GE will disclose the dollar amount reported to GE or its majority-owned subsidiaries that is ineligible for deduction as an "ordinary and necessary" business expense under Section 162(e) of the Internal Revenue Code (and, where all amounts contributed are eligible for the deduction, an indication that \$0 constituted non-deductible contributions).

501(c)4 Organizations

Each year, GE will disclose contributions made by GE or one of its majority-owned subsidiaries to an entity organized under Section 501(c)(4) of the Internal Revenue Code, identifying the organization and the amount contributed, to the extent any entity is identified as organized under Section 501(c)(4) to GE.

Independent Expenditures

GE has a long-standing practice against using corporate resources for the direct funding of independent expenditures expressly advocating for or against candidates in elections for public office. For each association from which GE receives a notice stating that the association has spent or will spend \$25,000 or more of GE's payments in a fiscal year on nondeductible lobbying and/or political expenditures under Internal Revenue Code Section 162(e), we ask the trade association to identify the portion of those payments used to fund independent expenditures expressly advocating for or against candidates in elections for public office. Any responses we receive to such requests are included in our political contributions report.

GEPAC

GEPAC is an independent, nonpartisan, voluntary fund supported by GE employees who choose to participate in the political process by pooling their resources to support candidates who share the values and goals of the Company and our employees.

[p.3] GEPAC raises voluntary contributions from eligible GE employees and supports candidates for the US Senate and House of Representatives, and selected candidates in state elections. In addition, contributions to certain national party organizations are made when appropriate. GEPAC reporting includes contributions to GEPAC Federal, a separate PAC supported exclusively by GE employees who are subject to the US Securities and Exchange Commission (SEC), Municipal Securities Rulemaking Board (MSRB), and/or other rules that affect political contributions by certain financial professionals. In August 2018, GEPAC Federal was terminated.

The Federal Election Commission (FEC) regulates the activities of GEPAC and GEPAC Federal. Reports detailing these activities are available on the FEC website at <http://www.fec.gov>. GEPAC also makes contributions to certain state-office candidates, so long as federal PAC contributions to state-office candidates are permitted in accordance with state laws. These states include Ohio, Pennsylvania, North Carolina, South Carolina, and Texas. A committee made up of employees nominated from GE businesses and corporate components directs contributions. The GEPAC Board sets overall budget targets, and day-to-day decisions are delegated to a subcommittee of the GEPAC Board.

GEPAC retains counsel to ensure compliance with the spirit and letter of all applicable laws and regulations. The GEPAC Board sets overall budget targets, and day-to-day decisions are delegated to a subcommittee of the GEPAC Board. GEPAC retains counsel to ensure compliance with the spirit and letter of all applicable laws and regulations. Each year, GE will publish GEPAC and GEPAC Federal contributions to candidate and other committees or organizations made during the calendar year.

Question

5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?
Score
2
Comments
<p>The company publishes a statement that it has not made any corporate political donations in the most recently reported financial year. In addition, there is evidence that the company publishes full details of the contributions made through its Political Action Committee (PAC) in the United States, by providing a link to its official disclosures. This data includes details of the recipient, amount and the name of the corporate entity that made the contribution. There is evidence that this data is updated and published on at least an annual basis.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.13] Twice yearly, GE publishes details of political contributions made either by the Company or the GE Political Action Committee (GEPAC).</p> <p>[41] 2019 Political Contributions (Document) Accessed 09/04/2020 https://www.ge.com/sustainability/sites/default/files/GEA19004_Political_Contributions_YE_2019.pdf January 1 – December 31, 2019 GE Corporate Global Contributions No GE Corporate contributions were made to U.S., Canadian, or foreign party committees, candidates, or incumbents in 2019.</p> <p>GEPAC Contributions GE sponsors the General Electric Company Political Action Committee (GEPAC), an independent, nonpartisan, voluntary fund supported by GE employees who choose to participate in the political process by pooling their resources to support candidates who share the values and goals of the Company and its employees. The Federal Election Commission (FEC) regulates the activities of GEPAC. Reports detailing these activities are available on the FEC website, http://www.fec.gov. A summary of contributions by GEPAC made during the 2019 calendar year is here:</p> <ul style="list-style-type: none"> GEPAC contributions 1st Half 2019: https://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=A97E8572-B792-43E9-88EEF3C0375C443D&filingTypeID=87 GEPAC contributions 2nd Half 2019: https://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=2AE924D0-2C35-4DE6-B513-75D5B7AE25BC&filingTypeID=89 <p>In 2019, GEPAC raised \$839,000 from more than 2,300 employees. GEPAC contributed \$972,000 to candidates and committees in federal elections in the United States. GEPAC made no contributions to state candidates or committees in 2019.</p> <p>Ballot Initiatives GE Aviation contributed \$25,000 on December 20, 2019 to the “Move Forward PAC” in support of a Hamilton County, Ohio ballot initiative.</p> <p>[30] 2018 Political Contributions (Document) Accessed 29/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA19004_Political_Contributions_YE2018_r1.pdf [p.1] January 1 – December 31, 2018 GE Corporate Global Contributions No GE Corporate contributions were made to U.S., Canadian or foreign party committees, candidates, or incumbents during 2018.</p> <p>GEPAC Contributions In 2018, the General Electric Political Action Committee (GEPAC) raised \$1.1 million from more than 2,700 employees. This amount includes \$5,800 contributed by 12 employees directly to GEPAC Federal, a separate PAC supported exclusively by GE employees who are subject to the U.S. Securities and Exchange Commission (SEC), Municipal Securities Rulemaking Board (MSRB) and/or other rules that affect political contributions by certain</p>

financial professionals. GEPAC and GEPAC Federal contributed \$938,000 to candidates and committees in federal elections. GEPAC contributed \$135,000 to candidates and committees in state elections in the United States. In August 2018, GEPAC Federal was terminated. The Federal Election Commission (FEC) regulates the activities of GEPAC and GEPAC Federal. Reports detailing these activities are available on the FEC website, <http://www.fec.gov>. A list of contributions by GEPAC and GEPAC Federal made during the 2018 calendar year is included in General Electric's LD-203 Lobbying Contributions Reports as follows:

- 2018 Mid-Year Report: <http://disclosures.house.gov/lc/lcxmrelease/2018/MM/700860855.xml>
- 2018 Year-End Report: <http://disclosures.house.gov/lc/lcxmrelease/2018/YY/700880246.xml>

Ballot Initiatives

Baker Hughes, a GE company, contributed \$250,000 on October 6, 2018 to the "Protect Colorado" ballot initiative.

[42] GEPAC Lobbying Contribution Report, Year-End 2019

Accessed 09/04/2020

<https://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=2AE924D0-2C35-4DE6-B513-75D5B7AE25BC&filingTypeID=89>



LOBBYING CONTRIBUTION REPORT

Clerk of the House of Representatives • Legislative Resource Center • E-106 Cannon Building • Washington, DC 20515
Secretary of the Senate • Office of Public Records • 232 Hart Building • Washington, DC 20510

FILER TYPE AND NAME

Type:
☒ Organization ☐ Lobbyist
Organization Name:
General Electric Company (including subsidiaries)

IDENTIFICATION NUMBERS

House Registrant ID:
34108
Senate Registrant ID:
15997

REPORTING PERIOD

Year:
2019
☐ Mid-Year (January 1 - June 30)
☒ Year-End (July 1 - December 31)

POLITICAL ACTION COMMITTEE NAMES

- General Electric Company Political Action Committee (GEPAC)

CONTRIBUTIONS

☐ No Contributions

#0.

Contribution Type: FECA	Contributor Name: General Electric Company Political Action Committee (GEPAC)	Amount: \$1,000.00	Date: 11/11/2019
Payee: Citizens For Eleanor Holmes Norton	Honoree: Rep. Eleanor Holmes Norton		

#1.

Contribution Type: FECA	Contributor Name: General Electric Company Political Action Committee (GEPAC)	Amount: \$1,000.00	Date: 8/1/2019
Payee: Schneider For Congress	Honoree: Rep. Bradley Scott Schneider		

#2.

Contribution Type: FECA	Contributor Name: General Electric Company Political Action Committee (GEPAC)	Amount: \$1,000.00	Date: 7/11/2019
Payee: Cole For Congress	Honoree: Rep. Thomas Jeffery Cole		

#3.

Contribution Type: FECA	Contributor Name: General Electric Company Political Action Committee (GEPAC)	Amount: \$1,000.00	Date: 10/4/2019
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Question

5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?
Score
1
Comments

There is evidence that the company has policies on both charitable donations and sponsorships, whether made directly or indirectly through its corporate foundation. There is evidence that any charitable donations and sponsorships must comply with a range of company policies to ensure their integrity. The company publishes details of its charitable contributions over \$10,000, including the name of the recipient organisation, amount and corporate entity that made the payment.

However, the company receives a score of '1' because there is no evidence that it publishes full details of all charitable donations or sponsorships made, including those under \$10,000. In addition, the company does not provide further publicly available information on the specific procedures and controls in place to regulate these donations, such as procedures for senior sign-off or due diligence on recipients.

Evidence
[37] Commitment to Compliance (Document)

Accessed 08/04/2020

<https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf>

[p.13] GE's Improper Payments Policy includes a clearly defined policy covering charitable donations and sponsorships, whether made directly or indirectly (including through corporate foundations), to ensure that any donations or sponsorship are not used as vehicles for bribery or corruption. GE Aviation implements the Improper Payments Policy's controls covering charitable donations and sponsorships through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, GE Lobbying Disclosure Policy, and GE Aviation Open Reporting and Investigation Process. Every year, GE publishes details of charitable contributions made by GE or the GE Foundation (the philanthropic organization of GE).

[38] Philanthropy (Webpage)

Accessed 06/01/2019

<https://www.ge.com/sustainability/philanthropy>

GE Foundation, the philanthropic organization of GE, is committed to transforming our communities and shaping the diverse workforce of tomorrow by leveraging the power of GE.

We are developing skills by bringing innovative learning in community health globally and STEM education, scaling what works, and building sustainable solutions. We are inspiring others to act by connecting GE people with communities through matching gifts and United Way, leading on emerging issues such as the opiate crisis, and convening community leaders to maximize our impact. The GE Foundation is powered by the generosity and talent of our employees, who have a strong commitment to their communities. Follow the GE Foundation on Twitter at @GE_Foundation.

Giving at a Glance

 Total GE "Family"
giving \$MM, 2018

129

 GE Foundation \$MM,
2018

59

 Matching Gifts \$MM,
2018

30
Education & Skills

Through its signature education and skills initiatives – Developing Futures™ and Developing Skills - the GE Foundation seeks to empower 14- to 24-year-old students to become globally productive citizens.

Developing Health

GE Foundation's signature programs, Developing Health Globally™ (DHG) and Developing Health U.S. (DH), aim to increase access to quality healthcare in underserved communities around the world.

Programs and Contributions

Disaster & Humanitarian Relief

GE's Disaster and Humanitarian Relief program responds to major global disasters and humanitarian crises.

GE Foundation and Corporate Contributions

GE is committed to transparency in our philanthropy.

GE Foundation Matching Gifts Program

The GE Foundation created the corporate matching gift program in 1954. The program supports employees in their personal philanthropy/charitable giving by providing a 1:1 match. Today, the GE Foundation Matching Gifts Program continues to serve as an important element of the Foundation's portfolio, with gifts matched in 2018 totaling more than \$30 million.

Our Reports

GE is committed to transparency. Find all disclosures in our Reports Hub to learn more on how we're working on social responsibility.

[43] 2019 GE Company Contributions Over USD 10K (Document)

Accessed 09/04/2020

[https://www.ge.com/sustainability/sites/default/files/GEA19005_GE%20Foundation_Contributions_greater_than_\\$10K_RY2019.pdf](https://www.ge.com/sustainability/sites/default/files/GEA19005_GE%20Foundation_Contributions_greater_than_$10K_RY2019.pdf)

[p.1] 2019 GE Foundation Contributions Above \$10,000

Source	Category	Organization Name	Contribution Amount \$ USD
GE Foundation	Disaster	Americares Foundation, Inc.	250,000
GE Foundation	Diversity - Boston	Essex County Community Foundation	1,899,739
GE Foundation	Diversity - Boston	Jobs for America's Graduates, Inc.	100,000
GE Foundation	Education/Skills - Boston	Boston Educational Development Foundation, Inc	3,426,020
GE Foundation	Education/Skills - Boston	John Fitzgerald Kennedy Library Foundation	118,050
GE Foundation	Education/Skills - Boston	The Fab Foundation	499,731
GE Foundation	Education/Skills - Boston	YEAR UP INC	500,000
GE Foundation	Education/Skills - US	Milwaukee Public Schools	1,841,608
GE Foundation	Health - Boston	Boston Medical Center	262,900
GE Foundation	Health - Boston	Health Resources in Action, Inc.	150,000
GE Foundation	Health - Boston	Massachusetts League of Community Health Centers, Inc.	1,320,115
GE Foundation	Health - Boston	NATIONAL MEDICAL FELLOWSHIPS INC	569,000
GE Foundation	Health - Boston	RIZE Massachusetts Foundation	500,000
GE Foundation	Health - Boston	Shatterproof	15,000
GE Foundation	Health - Boston	THE MASSACHUSETTS GENERAL HOSPITAL	847,219
GE Foundation	Health - Global	ASSIST INTERNATIONAL INC	1,055,000
GE Foundation	Health - Global	Dalberg Charitable	382,000
GE Foundation	Health - Global	Jhpiego Corporation	150,261
GE Foundation	Health - Global	President and Fellows of Harvard College	313,000
GE Foundation	Health - US	NATIONAL MEDICAL FELLOWSHIPS INC	395,000
GE Foundation	Health - US	University of New Mexico - Contract & Grants HSC	4,143,766
GE Foundation	Matching Gifts	A CHILDS HOPE INTERNATIONAL INC	14,499
GE Foundation	Matching Gifts	Action Against Hunger	11,630

[List continues to show 12 pages of contributions]

[39] Environmental Social and Governance Results 2018 (Document)

Accessed 19/03/2020

https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2018_r11_Sep2019.pdf

[p.1]

Philanthropy (o)					
GE Company Contributions via GE Businesses and to the Foundation (\$M)	--	119.4	93.6	90.7	GE Foundation, the philanthropic organization of GE, is committed to transforming our communities and shaping the diverse workforce of tomorrow.
Employee and Retiree Contributions matched by GE Foundation (\$M)	--	52.1	47.3	38.8	
Total GE "Family" Giving (\$M)	--	171.5	140.9	129.5	Total Contributions as a Percentage of GE Revenue is a new metric in 2018 to align with Chief Executives for Corporate Purpose Giving in Numbers annual survey.
Total Contributions as a Percentage of GE Revenue (\$M) (b)	--	0.10%	0.08%	0.07%	

[23] Developing Health Report (Document)

Accessed 28/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33683_Developing_Health.pdf

[p.1] Updated January 2019

In 2016, the GE Foundation announced a \$15 million, multi-year commitment addressing the opioid crisis in Boston and greater Massachusetts

\$14 million multi-year commitment to support the broad replication and scale of Project ECHO announced in 2015.

\$25 million commitment over three years for the Safe Surgery 2020 initiative globally

Developing Health: 2018 Highlights

The GE Foundation's signature programs, Developing Health Globally™ (DHG) and Developing Health U.S. (DH), aim to increase access to quality healthcare in underserved communities around the world. These programs are funded and managed by the GE Foundation in collaboration with national ministries of health, public and private health facilities, non-governmental organization, and academia.

Substance Use Disorder and the Opioid Crisis

In 2016, the GE Foundation announced a \$15 million commitment to community health in Boston and greater Massachusetts, to expand care in behavioral health and addiction medicine with a focus on the opioid crisis. The Developing Health initiatives in Massachusetts focus on expanding access to evidence-based treatment through primary care provider capacity building and reskilling, and on driving awareness and advocacy to combat the stigma associated with the disease of substance use disorder. Learn more here.

Project ECHO

Access to specialty health care in rural and medically underserved areas around the world is limited. Project ECHO (Extension for Community Healthcare Outcomes) is an innovative model that builds the capacity of and reskills primary care providers to treat more patients with chronic, complex conditions, exponentially expanding access to care. Through a \$14 million, multi-year commitment, the GE Foundation as the largest funder of Project ECHO, is supporting global replication and scale of this innovation. By leveraging technology, primary care providers are linked with multi-disciplinary teams of specialists who share their expertise. As the primary care providers expand their knowledge and skills, they can begin to treat more patients. With GE Foundation's support, Project ECHO is operating in 45 US states, 34 countries, with 253 replicating partners training in 66 focus areas.

Safe Surgery 2020

The GE Foundation is leading a multi-sector effort to improve surgical capacity and training with its Safe Surgery 2020 initiative. Access to safe, affordable surgical and anesthetic care is a pressing issue in global health. There are currently five billion people across the world who lack access to the safe surgical care they need, 90% of whom are in low- and middle-income countries.

[24] Reports Hub (Webpage)

Accessed 28/10/2019

<https://www.ge.com/sustainability/reports-hub#publicpolicy>

GE Foundation

[2018 GE Foundation](#)

[Contributions](#)

[2018 GE Company Contributions](#)

[GE Foundation Matching Gifts](#)

[Program](#)

[Developing Health](#)

[Disaster and Humanitarian Relief](#)

[Education & Skills](#)

[GE Volunteers](#)

[Driving STEM Education in Boston](#)

[Public Schools](#)

[Similar to the report published on Developing Health, the company publishes reports containing an overview of its philanthropic activities in the areas listed on the Reports Hub webpage]

5.2 Lobbying

Question
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
Score
2
Comments
<p>There is evidence that the company has a policy and procedures on lobbying that specify certain standards of conduct and oversight mechanisms. There is evidence that company's Vice President of Government Affairs & Policy provides oversight and prior approval of all lobbying activities. In addition, the company indicates that it has specific policies and procedures in place to ensure that lobbying is conducted responsibly, including dedicated training for lobbyists and restrictions on gifts and hospitality. It is clear that this policy applies to both employees engaged in lobbying activities and any third party lobbyists approved by the VP of Government Affairs & Policy.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.18] GE has policies and procedures covering responsible lobbying. GE's Improper Payments Policy includes a clearly defined policy covering lobbying expenditures, to ensure that any donations or sponsorship are not used as vehicles for bribery or corruption. The GE Lobbying Disclosure Policy provides that GE conducts lobbying activities in compliance with applicable laws and regulations and regularly trains employees on what types of activities and communications constitute reportable lobbying activities. Prior approval from GE's President for Government Affairs & Policy is required before GE employees engage, directly or indirectly, in lobbying activities or retain an outside entity to engage in lobbying activities. GE Aviation's policies on responsible lobbying are contained in various proprietary procedures, including the GE Lobbying Policy, GE Improper Payments Policy, Improper Payments Implementing Procedures, GE Political Contributions Policy, GE Controllershship Policy, GE Travel & Living Policy, GE Aviation Business Courtesy Procedure, GE Aviation Intermediary Procedure, and GE Aviation Open Reporting and Investigation Process.</p> <p>These policies provide standards of conduct which constitute responsible lobbying and include oversight mechanisms to ensure responsible lobbying conduct. Employees are generally not permitted to engage in lobbying (either directly or via a third-party lobbyist) of Government Officials, whether inside or outside the US. Before engaging in any lobbying activities must contact the VP of Government Affairs & Policy, their Lobbying Disclosure Act (LDA) Business Liaison, or Corporate Governmental Compliance Leader to ensure that any such activities are compliant with applicable laws, including those regarding disclosure of lobbying activities. These policies make clear that employees who engage in communications with government officials or government employees must refrain from making communications that create an appearance of an attempt to influence or reward a governmental act or decision in an inappropriate manner. Hiring a third party to represent GE in connection with lobbying activities is prohibited unless and until obtaining the prior approval from the Vice President, Government Affairs & Policy or that officer's designee.</p> <p>[p.19] For example, GE Aviation requires that at a minimum, all gifts and hospitalities over \$50 that are provided to government officials or employees of state-owned entities must be reviewed and pre-approved by a designated focal in the compliance department. The policy also lists lower thresholds for countries where this is required; e.g., for United States government employees, the policy requires all gifts and hospitalities to be preapproved. All submissions for preapproval of gifts or hospitality are made through a dedicated system which records the request, any supporting documentation, and the approval itself. This record is accessible to those responsible for oversight of this process.</p> <p>[25] Lobbying Disclosure Policy (Webpage) Accessed 28/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33662_Lobbying_Disclosure_Policy.pdf</p> <p>[p.1] GE employees engage with public officials at all levels of government-local, state and federal. Employees educate officials on our Company's operations, emerging technologies and markets, as well as on our views on</p>

public policy issues. All advocacy done by our employees on pending U.S. legislation is included in our Lobbying Disclosure Act (LDA) filings.

GE conducts lobbying activities in compliance with applicable laws and regulations governing such activities. In the United States, certain communications with federal, state and/or local government officials or government employees may be reportable as lobbying communications included in GE's LDA reports and/or state or local lobbying disclosure reports. Certain countries outside the United States may also require disclosure of lobbying activities.

Before engaging in lobbying activities, employees are asked to contact the President, Government Affairs & Policy or his or her designee. GE regularly trains employees on what types of activities and communications constitute reportable lobbying activities. Prior approval from GE's President, Government Affairs & Policy is required before GE may retain an outside entity to engage in lobbying activities.

Reviewing and Reporting Lobbying Expenses

As part of its oversight role in public policy and corporate social responsibility, the Governance and Public Affairs Committee (GPAC) of the Board of Directors receives and semiannually reviews reports on the Company's lobbying expenses. GE uses the Internal Revenue Code (IRC) method to detail its lobbying expenses in its federal Form LD-2 lobbying report filed each calendar quarter. Under this method, expenses related to state and/or local legislative lobbying in all 50 states are included in GE's total lobbying expense reported each quarter and reviewed semiannually by GPAC. In limited circumstances, when an issue is of particular strategic importance, the Company may use advertisements or other public communications to urge support for specific legislation or public policy. Grassroots lobbying expenses also are included in our LDA filings.

Question
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?
Score
2
Comments
<p>The company publishes a list of the topics on which it lobbies, including a description of its core positions, their importance or relevance to the company and stakeholders, and the activities it carries out. There is evidence that this represents lobbying activities conducted by both the company's employees and any third parties engaged in lobbying on its behalf. In addition, it is clear that these points represent the aims and topics in all jurisdictions where the company conducts lobbying activities.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.19] GE publishes details of the aims and topics of its public policy development and lobbying activities. As one of the world's largest companies, and one active in many sectors of the global economy, GE engages in public policy discussions that impact our Company, our workers, and our communities. GE approaches public policy through education, engagement, involvement and thought leadership. We inform discussions by promoting thoughtful discourse grounded in strong, fact-based and reasoned analysis. We work in partnership with governments, believing that tackling the world's biggest problems is possible only if governments and industry work together as partners. GE works to promote public policy issues in areas such as energy, healthcare, transportation, international trade and investment, tax, data governance, rule of law, and government procurement.</p> <p>We are committed to engaging with governments—globally, nationally, and locally—through constructive dialogue, promotion of innovative public policy ideas, formation of novel public-private partnerships, and investments in solutions that help address the fundamental challenges that confront societies.</p> <p>[p.20] Globally, we support public policies that promote open markets, technology, and innovation. GE's most recent public policy priorities include rule of law globally; effective laws and regulations governing the transfer and protection of data; trade policy; global energy and environmental policies; government procurement; intellectual property protection; promotion of exports and the free flow of goods; tax reform and competitive economic policy; regulatory reform associated with energy, infrastructure, healthcare and digital policy; effective and modernized defense procurement; policies that facilitate the movement of people consistent with business needs; and policies to promote effective economic development in less-developed countries.</p> <p>GE's Board of Directors believes that it is in the best interest of GE's stakeholders to promote sound public policies at the international, national, and local levels. To that end, our Government Affairs & Policy team works with GE's business teams to develop a semiannual assessment of their legislative and regulatory priorities. Similarly, we conduct surveys of issues and priorities across GE's regions worldwide. Each business provides a description of its public policy priorities, ties these to a GE objective, and provides input on the significance of the respective issue(s) to the company.</p> <p>The businesses also provide input on the appropriate advocacy plan or strategy for achieving a successful outcome—including whether or not GE should advocate for a priority directly or through one of its trade associations or industry coalitions. In the latter case, GE can help facilitate coordination with other companies with similar priorities. Once each business has assessed and submitted its priorities, our Government Affairs & Policy team can better determine GE's overall public policy priorities and allocate resources to them accordingly. In evaluating public policy priorities for an upcoming year, Government Affairs & Policy works with GE's senior management to review the potential reputational consequences and risks of pursuing or not pursuing a priority. We set commercial priorities to increase shareowner value, mindful that our commercial success depends on progress on broader public policy imperatives.</p>

[14] Public Policy Priorities (Document)

Accessed 27/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33642_Setting_Public_Policy_Priorities.pdf

[p.1] Setting Public Policy Priorities

As one of the world's largest companies, and one active in many sectors of the global economy, GE engages in public policy discussions that impact our Company, our workers, and our communities. We approach public policy through education, engagement, involvement, and thought leadership. We seek to inform discussions by promoting thoughtful civil discourse grounded in strong, fact-based and reasoned analysis. We work in partnership with governments, because we know that tackling the world's biggest problems is only possible if governments and industry work together as partners. Each year, GE evaluates public policy priorities for the upcoming year. Our team reviews a number of factors, including the potential reputational effects and risks associated with pursuing or not pursuing a particular priority.

Working Globally, Nationally, and Locally

GE works to promote public policy issues in areas such as energy, healthcare, transportation, international trade and investment, tax, data governance, rule of law, and government procurement. We are committed to engaging with governments—globally, nationally, and locally—through constructive dialogue, promotion of innovative public policy ideas, formation of novel public-private partnerships, and investments in solutions that help address the fundamental challenges that confront societies. Globally, we support public policies that promote open markets, technology, and innovation.

Societies with predictable and transparent legal institutions and processes engender confidence, investment, and growth. GE works actively to support stronger rule of law around the world. Key focus areas include anticorruption; legal and administrative transparency and predictability; independent judiciaries; transparency and competitiveness in public procurement; and fair and effective dispute resolution. GE, our employees, and the GE Foundation have supported numerous programs to achieve these goals.

Assessing Policy Priorities, Defining Objectives

GE's Board of Directors believes that it is in the best interest of GE's stakeholders to promote sound public policies at the international, national, and local levels. To that end, our Government Affairs & Policy team works with the Company's business teams to develop a semiannual assessment of their legislative and regulatory priorities. Similarly, we conduct surveys of issues and priorities across GE's regions worldwide. Each business provides a description of its public policy priorities, ties these to a GE objective, and provides input on the significance of the respective issue(s) to the Company.

[p.2] The businesses also provide input on the appropriate advocacy plan or strategy for achieving a successful outcome—including whether or not GE should advocate for a priority directly or through one of its trade associations or industry coalitions. In the latter case, GE can help facilitate coordination with other companies with similar priorities. Once each business has assessed and submitted its priorities, our Government Affairs & Policy team can better determine GE's overall public policy priorities and allocate resources to them accordingly. In evaluating public policy priorities for an upcoming year, Government Affairs & Policy works with GE's senior management to review the potential reputational consequences and risks of pursuing or not pursuing a priority. We set commercial priorities to increase shareowner value, mindful that our commercial success depends on progress on broader public policy imperatives.

[44] Public Policy Priorities 2020 (Document)

Accessed 09/04/2020

https://www.ge.com/sustainability/sites/default/files/GEA33665_Public_Policy_Priorities_2020.pdf

[p.1] GE's 2019 Public Policy Priorities

Updated February 2020

- Tax reform and competitive economic policy
- Regulatory reform associated with energy, infrastructure, healthcare and digital policy
- Effective and modernized defense procurement
- Effective laws and regulations governing the transfer and protection of data
- Trade policy
- Global energy and environmental policies
- Government procurement
- Intellectual property protection

- Promotion of exports and the free flow of goods
- Rule of law, globally
- Policies that facilitate the movement of people consistent with business needs
- Policies to promote effective economic development in less-developed countries

[13] Public Policy Priorities 2019 (Document)

Accessed 27/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33665_Public_Policy_Priorities.pdf

[p.1] GE's 2018 Public Policy Priorities

Updated January 2019

- Tax reform and competitive economic policy
- Regulatory reform associated with energy, infrastructure, healthcare and digital policy
- Effective and modernized defense procurement
- Effective laws and regulations governing the transfer and protection of data
- Trade policy
- Global energy and environmental policies
- Government procurement
- Intellectual property protection
- Promotion of exports and the free flow of goods
- Rule of law, globally
- Policies that facilitate the movement of people consistent with business needs
- Policies to promote effective economic development in less-developed countries

[10] Political Contributions Policy (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33643_Political_Contributions_Policy_r2.pdf

[p.2] Associations

As one of the largest and most diverse companies in the world, GE belongs to many associations and coalitions in which we work with our industry partners and represent our Company's interests. In some cases, these associations and coalitions engage in advocacy at the state and federal levels. While we generally agree with the positions the associations take on public policy issues, membership in a particular trade association does not indicate agreement with all of the association's views. Occasionally, these associations take positions that differ from ours. In those cases, we engage with the associations to express our views. Each year, GE will inquire and make a reasonable effort to obtain information about what portion of the company's dues or payments were used for lobbying expenditures or political contributions from those associations where our dues and other expenditures total \$50,000 or more.

Each year, GE will disclose a list of U.S. trade associations receiving more than \$50,000 in annual contributions from GE or one of its majority-owned subsidiaries. For each of the aforementioned trade associations, GE will disclose the dollar amount reported to GE or its majority-owned subsidiaries that is ineligible for deduction as an "ordinary and necessary" business expense under Section 162(e) of the Internal Revenue Code (and, where all amounts contributed are eligible for the deduction, an indication that \$0 constituted non-deductible contributions).

GE's foreign political contributions are currently limited to Canada. GE believes it is important for our employees to be informed about public policy issues and, consistent with applicable law, will not take any adverse employment action against an employee based on his or her personal political affiliation or lawful political activity.

[25] Lobbying Disclosure Policy (Webpage)

Accessed 28/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33662_Lobbying_Disclosure_Policy.pdf

[p.1] GE employees engage with public officials at all levels of government-local, state and federal. Employees educate officials on our Company's operations, emerging technologies and markets, as well as on our views on public policy issues. All advocacy done by our employees on pending U.S. legislation is included in our Lobbying Disclosure Act (LDA) filings.

[45] Q4 Lobbying Disclosure Report (Webpage)

Accessed 09/04/2020

<https://disclosurespreview.house.gov/ld/ldxmlrelease/2019/Q4/301126031.xml>

LOBBYING ACTIVITY

16. Specific lobbying issues

Acquisition reform

Adaptive Engine Technology Development

Combat Rescue Helicopter (CRH)

F/A-18 Super Hornet/Growler

Improved Turbine Engine Program (ITEP)

USMC AH-1Z

Digital Infrastructure

B-52 reengining

Defense Appropriations, FY 2020

The National Defense Authorization Act for FY 2020

Joint Strike Fighter

CH-53K, Apache and Blackhawk Helicopter Programs

Future Frigate (FFGX)

Robust Electrical Power System (REPS)

Future Vertical Lift (FVL)

NGAD - next generation air dominance

Additive

Advanced Surface Machinery System

Strategic Capabilities Office - Mobile reactors

[The document lists legislative topics it has supported under a total of nine Lobbying codes]

[27] Q3 Lobbying Disclosure Report (Webpage)

Accessed 28/10/2019

<http://disclosures.house.gov/ld/ldxmlrelease/2019/Q3/301077038.xml>

LOBBYING ACTIVITY.

Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.

15. General issue area code DEF

16. Specific lobbying issues

Acquisition reform

Adaptive Engine Technology Development

Combat Rescue Helicopter (CRH)

F/A-18 Super Hornet/Growler

Improved Turbine Engine Program (ITEP)

USMC AH-1Z

Digital Infrastructure

B-52 reengining

Defense Appropriations, FY 2020

The National Defense Authorization Act for FY 2020

Joint Strike Fighter

CH-53K, Apache and Blackhawk Helicopter Programs

Future Frigate (FFGX)

Robust Electrical Power System (REPS)

Future Vertical Lift (FVL)

NGAD - next generation air dominance

Additive

[The document lists legislative topics it has supported under a total of eight Lobbying codes]

Question

5.2.3 Does the company publish full details of its global lobbying expenditure?**Score****1****Comments**

There is evidence that the company publishes its lobbying expenditure in the United States, by providing a link to its official disclosures. There is evidence that this information is correct up to the most recent quarter of the financial year.

However, the company receives a score of '1' because it does not provide further details of its lobbying expenditure, to indicate details such as the corporate entity, geography, internal lobbyists/external lobbyists/association lobbying and an explanation of how the figures in the data have been calculated. Additionally, the company does not provide a clear statement regarding its lobbying expenditure outside the United States.

Evidence**[37] Commitment to Compliance (Document)**

Accessed 08/04/2020

<https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf>

[p.21] GE uses the Internal Revenue Code method to detail its lobbying expenses in its federal Form LD-2 lobbying report filed each calendar quarter. Under this method, expenses related to state and/or local legislative lobbying in all 50 states are included in GE's total lobbying expense reported each quarter.

[45] Q4 Lobbying Disclosure Report (Webpage)

Accessed 09/04/2020

<https://disclosurespreview.house.gov/ld/ldxmlrelease/2019/Q4/301126031.xml>

INCOME OR EXPENSES - YOU MUST complete either Line 12 or Line 13	
12. Lobbying INCOME relating to lobbying activities for this reporting period was: Less than \$5,000 <input type="checkbox"/> \$5,000 or more <input type="checkbox"/> \$ _____ Provide a good faith estimate, rounded to the nearest \$10,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).	13. Organizations EXPENSE relating to lobbying activities for this reporting period were: Less than \$5,000 <input type="checkbox"/> \$5,000 or more <input checked="" type="checkbox"/> \$ 1,080,000.00 14. REPORTING Check box to indicate expense accounting method. See instructions for description of options. <input type="checkbox"/> Method A. Reporting amounts using LDA definitions only <input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code <input checked="" type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code
Signature	Digitally Signed By: Joanne McMahon Date 1/21/2020 1:56:05 PM

[27] 2019 Q3 Lobbying Disclosure Report (Document)

Accessed 28/10/2019

<http://disclosures.house.gov/ld/ldxmlrelease/2019/Q3/301077038.xml>

INCOME OR EXPENSES - YOU MUST complete either Line 12 or Line 13	
12. Lobbying INCOME relating to lobbying activities for this reporting period was: Less than \$5,000 <input type="checkbox"/> \$5,000 or more <input type="checkbox"/> \$ _____ Provide a good faith estimate, rounded to the nearest \$10,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).	13. Organizations EXPENSE relating to lobbying activities for this reporting period were: Less than \$5,000 <input type="checkbox"/> \$5,000 or more <input checked="" type="checkbox"/> \$ 850,000.00 14. REPORTING Check box to indicate expense accounting method. See instructions for description of options. <input type="checkbox"/> Method A. Reporting amounts using LDA definitions only <input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code <input checked="" type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code

5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
2
Comments
<p>There is evidence that the company has a policy on the giving and receipt of gifts and hospitality with clear procedures to ensure that such expenses are not used as vehicles for bribery or corruption. The company's policy establishes financial limits, along with an approval procedure, for the different types of promotional expense that employees may encounter. There is evidence the policy addresses the risks associated with gifts and hospitality given to and/or received from domestic and foreign public officials, by specifying a different financial threshold. In addition, there is evidence that gifts and hospitality are recorded in a dedicated register that is accessible to those responsible for oversight of the process.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.p df <p>[p.21] GE has a comprehensive Improper Payments Policy that governs the giving and receipt of gifts and hospitality, with clear procedures designed to ensure such gifts and hospitality are bona fide to prevent undue influence or other corruption. GE Aviation implements the Improper Payments Policy through various proprietary procedures, including the GE Improper Payments Implementing Procedures, GE Aviation Business Courtesy Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, GE Lobbying Disclosure Policy, and GE Aviation Open Reporting and Investigation Process. These policies and procedures require that all business gifts and hospitality must have a legitimate business purpose, be reasonable and in good taste, be provided transparently and in good faith without expectation of reciprocity, not be intended or likely to influence performance of official duties, and comply with all laws and ethics rules applicable to GE and the recipient.</p> <p>These policies and procedures establish financial limits, along with an approval procedure, for the different types of promotional expense that employees may encounter, including requirements and procedures to obtain preapproval for business gifts, hospitality, or any other thing of value above appropriate thresholds. These policies and procedures also explicitly address the risks associated with gifts and hospitality given to and/or received from domestic</p> <p>[p.22] and foreign public officials, e.g. by specifying a different financial threshold, and include a clear statement that all gifts and hospitality above certain thresholds are recorded in a dedicated register or central depository that is accessible to those responsible for oversight of the process.</p> <p>For example, GE Aviation requires that at a minimum, all gifts and hospitalities over \$50 that are provided to government officials or employees of state-owned entities must be reviewed and pre-approved by a designated focal in the compliance department. The policy also lists lower thresholds for countries where this is required; i.e. for United States government employees, the policy requires all gifts and hospitalities to be preapproved.</p> <p>All submissions for preapproval of gifts or hospitality are made through a dedicated system that records the request, any supporting documentation, and the approval itself. This record is accessible to those responsible for oversight of this process. GE Aviation policies generally prohibit the receipt of any gifts or hospitalities from suppliers except for a few clearly itemized exceptions, for example certain promotional items of nominal value under \$10 where the item is not solicited by the employee and satisfies other criteria enumerated in the policy.</p> </p>
<p>[11] GE Integrity Homepage (Webpage) Accessed 25/10/2019 https://www.ge.com/sustainability/integrity Assessment</p>

Data is increasingly important in how we work. Systems, processes, and business risk assessments result in data that can yield ongoing insights into our program's health. For example, we use a gifts & hospitality monitoring program to track trends and flags regarding spend and type of recipient.

[1] GE Code of Conduct (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf

[p.10] YOUR ROLE

- Never offer, promise, make, or authorize a payment or the giving of anything of value to anyone in order to obtain an improper business advantage.
- Remember that providing gifts, entertainment or anything else of value to government employees is highly regulated and often prohibited. Do not provide such gifts and entertainment unless you have received prior GE counsel approval.

Follow Corporate and business guidelines regarding gifts and entertainment and other business courtesies.

[p.11] YOUR ROLE

- Follow the procedures set out in GE's Supplier Responsibility Guidelines.
- [...]
- Avoid potential conflicts of interest when you select a supplier, and never accept improper gifts or other items of value.

[p.22] YOUR ROLE

- [...]
- Do not accept gifts other than those of nominal value from suppliers, customers or competitors.
 - Do not accept personal discounts or other benefits from suppliers or customers if they are not available to the general public or your GE peers.

[3] Jan 2019 Anti-Corruption Fact Sheet (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf

[p.1] Anticorruption

GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.

GE's approach to compliance in this critical area is multifaceted. Among its key features are:

- Corporate policies and procedures that reflect the Company's approach by prohibiting improper payments in every transaction, whether with a government or with a private party
- [...]
- Heightened attention to key risk areas such as gifts and entertainment, travel and living expenses, donations, and facilitating payments

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
1
Comments
<p>There is evidence that the company's procurement department is the main body involved in the establishment and oversight of supplier relationships. However, the company receives a score of '1' because there is no evidence that the company takes steps to assure itself of the proper functioning of this system or that the procurement department is appropriately involved in the process, such as through regular audits.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.22] GE Aviation requires the involvement of its procurement department—known as the GE Aviation Sourcing Department—in the establishment of new supplier relationships and in the oversight of its supplier base. The Sourcing Department, including the Sourcing Compliance team, must vet and approve all GE Aviation suppliers. The onboarding process is workflow-based and a supplier cannot be onboarded without completing each step in the multi-level review process.</p> <p>[p.23] The process includes diligence in multiple areas (questionnaires, entity verification, certifications, site visits where risk level warrants it, among others) and approval is required from a variety of sourcing employees and risk area specialists, including compliance, finance, legal, IT and commodity leaders.</p> <p>[5] Ethical Supply Chain Program (Document) Accessed 27/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33731_Ethical_Supply_Chain_Program_r1.pdf</p> <p>[p.1] Program Overview Our supply chain efforts are most effective when we prioritize based on risk and where our involvement can have the most impact. Suppliers are prioritized for detailed, on-site assessments depending upon the country in which they are located, their past performance and whether they are producing parts or components that will be incorporated into GE products. We also prioritize labor suppliers in situations where GE is working on behalf of a customer, either alone or as a consortium partner, in construction and commissioning work in parts of the world where acceptable labor standards may not align with GE's SIG. The onsite assessments cover environmental, health, safety, labor, human rights, and security issues using a global protocol that reflects GE's Supplier Expectations. The assessments take place prior to placing initial orders with new suppliers, and periodically thereafter, on a one- to five -year time frame, depending on our experience with the supplier.</p> <p>[p.2] Continued Improvement We are always looking for ways to improve our supply chain management program and more effectively use our resources to identify and correct supplier activities that do not comply with our standards.</p> <p>[34] California Transparency in Supply Chains Act Summary (Document) Accessed 29/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33646_California_Transparency_Factsheet_R8.pdf</p> <p>[p.1] GE's supply chain is large and diverse. GE buys raw materials and components that are incorporated into the products and services that GE sells (direct materials). The largest categories of direct materials purchased are castings, forgings, electronics, plastics and machined parts. GE also buys products and services to support its business operations, which are used to develop or create, but are not incorporated into, GE's products or services. These indirect purchases range from logistical support, tools and supplies to IT, telecom and professional services. GE sources from approximately 150 countries. Below we respond to the five areas listed under the California Transparency in Supply Chains Act.</p>

Verification

GE's Supply Chain monitoring program is multifaceted and risk-based. Suppliers are prioritized for detailed pre-engagement and subsequent periodic on-site assessments based on country risks, the supplier's past performance and other factors, such as whether GE has become aware of any reason to believe that the supplier is not living up to our expectations. Almost all on-site assessments are conducted in developing countries, as part of our overall supplier-management strategy, but we maintain an "eyes always open" policy to be alert to potential violations of our standards in interactions with our suppliers.

Question
6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?
Score
2
Comments
<p>There is evidence that the company has formal procedures to conduct anti-bribery and corruption due diligence on all suppliers. There is evidence that the highest risk suppliers are subject to enhanced due diligence and the process includes checks on ultimate beneficial ownership. There is evidence that the company will not onboard a supplier, and will also terminate an existing relationship, if a red flag identified in due diligence cannot be mitigated. In addition, there is evidence that such checks on suppliers are repeated throughout the relationship, with audits conducted every one to three years depending on the level of risk and on-site assessments every one to five years.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.23] GE Aviation conducts comprehensive, risk-based due diligence when engaging new suppliers and periodically thereafter. This process includes risk-based anti-bribery and corruption due diligence, entity validation, screening for compliance with international trade laws and regulations, checks on ultimate beneficial ownership, and other onboarding requirements. Higher risk suppliers are subject to heightened due diligence. Prior to onboarding, any direct supplier identified as high risk (located in a high-risk country and/or specific commodity) also undergoes a physical audit by a certified GE auditor to evaluate the supplier in areas such as human rights, environmental compliance, health and safety, security.</p> <p>These audits are repeated every 1 to 3 years depending on the location of the supplier and the level of risk. All findings are documented and tracked to closure in a central online database which includes details from all prior audits and whether the supplier is approved, rejected or under review. A supplier cannot be onboarded until findings of concern are adequately addressed. If a concern is identified during a repeat audit it must be addressed in a timely manner or the supplier may be terminated. GE Aviation also conducts a daily watchlist screening against all entities with whom it does business. Any match that is made gets flagged and escalated for immediate follow up.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf <p>[p.10] Follow your business due diligence procedures and require that any third party representing GE be carefully selected and comply with this policy.</p> <p>[p.11] What You Should Know</p> <p>GE's reputation for integrity can be significantly affected by those whom we select to act as our suppliers.</p> <p>[5] Ethical Supply Chain Program (Document) Accessed 27/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33731_Ethical_Supply_Chain_Program_r1.pdf <p>[p.1] Program Overview</p> <p>Our supply chain efforts are most effective when we prioritize based on risk and where our involvement can have the most impact. Suppliers are prioritized for detailed, on-site assessments depending upon the country in which they are located, their past performance and whether they are producing parts or components that will be incorporated into GE products. We also prioritize labor suppliers in situations where GE is working on behalf of a customer, either alone or as a consortium partner, in construction and commissioning work in parts of the world where acceptable labor standards may not align with GE's SIG. The onsite assessments cover environmental, health, safety, labor, human rights, and security issues using a global protocol that reflects GE's Supplier Expectations. The assessments take place prior to placing initial orders with new suppliers, and periodically thereafter, on a one- to five -year time frame, depending on our experience with the supplier.</p> </p> </p></p>

In addition to evaluating ethical performance through our supplier assessments, these assessments include focus on environmental, health and safety compliance and conditions. GE promotes resource conservation and EHS management initiatives within our supplier community. GE also engages with a broad group of stakeholders to drive EHS performance and improvement with suppliers, including governments, business partners, academic, and nongovernmental organizations. Given the size and complexity of GE's supply chain, these programs help us prioritize our actions and enable meaningful partnerships that drive better results.

[p.2] All GE personnel who interact with supplier facilities, regardless of their role or expertise, are expected to participate in awareness training on GE's supplier expectations, human rights issues and on-site due diligence requirements.

[34] California Transparency in Supply Chains Act Summary (Document)

Accessed 29/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33646_California_Transparency_Factsheet_R8.pdf

[p.1] Verification

GE's Supply Chain monitoring program is multifaceted and risk-based. Suppliers are prioritized for detailed pre-engagement and subsequent periodic on-site assessments based on country risks, the supplier's past performance and other factors, such as whether GE has become aware of any reason to believe that the supplier is not living up to our expectations. Almost all on-site assessments are conducted in developing countries, as part of our overall supplier-management strategy, but we maintain an "eyes always open" policy to be alert to potential violations of our standards in interactions with our suppliers.

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
1
Comments
<p>There is some evidence that the company ensures that its suppliers have adequate anti-bribery and corruption policies and procedures in place, by stating that all suppliers must adhere to its Integrity Guide for Suppliers Contractors and Consultants. This document prohibits bribery, refers to gifts and hospitality and offers of employment, and provides details of the company's whistleblowing line. There is evidence that the company conducts ethical evaluations of its suppliers when onboarding them, and thereafter every one to five years, although the company does not refer specifically to assessing the anti-bribery and corruption policies of suppliers.</p> <p>The company receives a score of '1' because it is not clear from publicly available evidence that it requires suppliers to have policies in place which prohibit facilitation payments and regulate conflicts of interest.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.24] All suppliers must agree to follow the GE Integrity Guide for Suppliers, Contractors and Consultants, which requires suppliers to maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials; not to offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, including offers of employment, or participation in a contest, game or promotion, to any GE employee, representative or GE customer or to any government official in connection with any GE procurement, transaction or business dealing; and to provide supporting data to GE when requested. In addition, all GE suppliers must ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in the Integrity Guide and in other contractual obligations to GE.</p> <p>[2] Integrity Guide for Suppliers Contractors and Consultants (Document) Accessed 27/10/2019 http://www.gesupplier.com/html/SuppliersIntegrityGuide/download/GE%20Integrity%20Guide%20for%20Suppliers-EN.pdf <p>[p.1] A Message from GE</p> <p>The General Electric Company ("GE") is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with GE suppliers, contractors, consortium partners and consultants (collectively "Suppliers"). GE bases its Supplier relationships on lawful, efficient and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this GE Integrity Guide for Suppliers, Contractors and Consultants (the "Guide") in connection with their activities for GE.</p> <p>Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in this Guide and in other contractual obligations to GE. Please contact the GE manager you work with or any GE Compliance Resource if you have any questions about this Guide or the standards of business conduct that all GE Suppliers must meet.</p> <p>Responsibilities of GE Suppliers</p> <p>You, as a Supplier to GE, agree:</p> <p>[...]</p> <p>Working with Governments, Improper Payments and Dealings with GE Employees and Representatives:</p> <p>(i) To maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery of government officials,</p> </p></p>

(ii) not to offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, including offers of employment, or participation in a contest, game or promotion, to any GE employee, representative or GE customer or to any government official in connection with any GE procurement, transaction or business dealing, and

(iii) to provide supporting data to GE when requested.

[p.2] How to Raise a Question or Concern

Subject to local laws and any legal restrictions applicable to such reporting, each GE Supplier is expected to inform GE promptly of any concern related to this Guide affecting GE, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence.

GE Suppliers also must take such steps as GE may reasonably request to assist GE in the investigation of any such occurrence involving GE and the Supplier.

If Supplier's work is related to a U.S. government contract, Supplier must notify GE of any alleged non-conformance with this Supplier Integrity Guide.

I. Define your question/concern: Who or what is the concern? When did it arise? What are the relevant facts? II. Prompt reporting is crucial — a question or concern may be raised by a GE Supplier as follows:

- By discussing with a cognizant GE Manager;
OR
- By calling the GE Integrity Helpline: +1 800-227-5003 or +1 617-443-3077;
OR
- By emailing ombudsperson@corporate.ge.com
OR
- By contacting any Compliance Resource (e.g., GE legal counsel or auditor).

[5] Ethical Supply Chain Program (Document)

Accessed 27/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33731_Ethical_Supply_Chain_Program_r1.pdf

[p.1] Program Overview

Our supply chain efforts are most effective when we prioritize based on risk and where our involvement can have the most impact. Suppliers are prioritized for detailed, on-site assessments depending upon the country in which they are located, their past performance and whether they are producing parts or components that will be incorporated into GE products. We also prioritize labor suppliers in situations where GE is working on behalf of a customer, either alone or as a consortium partner, in construction and commissioning work in parts of the world where acceptable labor standards may not align with GE's SIG. The onsite assessments cover environmental, health, safety, labor, human rights, and security issues using a global protocol that reflects GE's Supplier Expectations. The assessments take place prior to placing initial orders with new suppliers, and periodically thereafter, on a one- to five -year time frame, depending on our experience with the supplier.

In addition to evaluating ethical performance through our supplier assessments, these assessments include focus on environmental, health and safety compliance and conditions. GE promotes resource conservation and EHS management initiatives within our supplier community. GE also engages with a broad group of stakeholders to drive EHS performance and improvement with suppliers, including governments, business partners, academic, and nongovernmental organizations. Given the size and complexity of GE's supply chain, these programs help us prioritize our actions and enable meaningful partnerships that drive better results.

Question
6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?
Score
2
Comments
<p>There is some evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required of sub-contractors throughout the supply chain. The company states that it expects its suppliers to communicate these standards throughout the supply chain, and indicates that it conducts audits on subcontractors in sub-tiers to ensure compliance.</p>
Evidence
<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.24] All suppliers must agree to follow the GE Integrity Guide for Suppliers, Contractors and Consultants, which requires suppliers to maintain and enforce a policy requiring adherence to lawful business practices, including a</p> <p>[p.25] prohibition against bribery of government officials; not to offer or provide, directly or indirectly, anything of value, including cash, bribes, gifts, entertainment or kickbacks, including offers of employment, or participation in a contest, game or promotion, to any GE employee, representative or GE customer or to any government official in connection with any GE procurement, transaction or business dealing; and to provide supporting data to GE when requested.</p> <p>In addition, all GE suppliers must ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in the Integrity Guide and in other contractual obligations to GE. GE Aviation's standard supplier contract terms include audit rights and termination rights in the case of noncompliance. GE also audits sub-tier special process suppliers on a regular basis from a quality standpoint.</p> <p>[2] Integrity Guide for Suppliers Contractors and Consultants (Document) Accessed 27/10/2019 http://www.gesupplier.com/html/SuppliersIntegrityGuide/download/GE%20Integrity%20Guide%20for%20Suppliers-EN.pdf [p.1] Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in this Guide and in other contractual obligations to GE. Please contact the GE manager you work with or any GE Compliance Resource if you have any questions about this Guide or the standards of business conduct that all GE Suppliers must meet.</p>

Question																																																																																																																																	
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?																																																																																																																																	
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<p>The company provides some data on environmental, social and governance audits of its suppliers, which includes incidents related to ethics and corruption. This data includes the number of audits conducted and the total number of findings, and there is evidence that this data is published on an annual basis.</p> <p>The company receives a score of '1' because there is no evidence that it clearly publishes information on the number of investigations launched and the number of disciplinary actions as a result of investigation findings for suppliers specifically.</p>																																																																																																																																	
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<p>[37] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.25] The company publishes environmental, social and governance related incidents in its audits of its suppliers and this data includes findings related to ethics or corruption.</p> <p>[39] Environmental Social and Governance Results 2018 (Document) Accessed 19/03/2020 https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2018_r11_Sep2019.pdf [p.1] 2018 Environmental, Social, and Governance Results</p>																																																																																																																																	
<table><tr><th>Indicator</th><th>Baseline</th><th>2016</th><th>2017</th><th>2018</th><th>Discussion</th></tr><tr><td colspan="6">Workforce (a)</td></tr><tr><td>U.S. and Canada</td><td>--</td><td>--</td><td>--</td><td>103</td><td rowspan="4">Workforce changes reflect the transformation of our business portfolio to focus on our core businesses.</td></tr><tr><td>EMEA</td><td>--</td><td>--</td><td>--</td><td>96</td></tr><tr><td>Asia</td><td>--</td><td>--</td><td>--</td><td>61</td></tr><tr><td>Latin America</td><td>--</td><td>--</td><td>--</td><td>23</td></tr><tr><td>Total (thousands)</td><td>--</td><td>295</td><td>313</td><td>283</td><td></td></tr><tr><td colspan="6">Philanthropy (o)</td></tr><tr><td>GE Company Contributions via GE Businesses and to the Foundation (\$M)</td><td>--</td><td>119.4</td><td>93.6</td><td>90.7</td><td rowspan="2">GE Foundation, the philanthropic organization of GE, is committed to transforming our communities and shaping the diverse workforce of tomorrow.</td></tr><tr><td>Employee and Retiree Contributions matched by GE Foundation (\$M)</td><td>--</td><td>52.1</td><td>47.3</td><td>38.8</td></tr><tr><td>Total GE "Family" Giving (\$M)</td><td>--</td><td>171.5</td><td>140.9</td><td>129.5</td><td rowspan="2">Total Contributions as a Percentage of GE Revenue is a new metric in 2018 to align with Chief Executives for Corporate Purpose Giving in Numbers annual survey.</td></tr><tr><td>Total Contributions as a Percentage of GE Revenue (\$M) (b)</td><td>--</td><td>0.10%</td><td>0.08%</td><td>0.07%</td></tr><tr><td colspan="6">Governance (c)</td></tr><tr><td>Ombudsperson Concerns by Area (reports per policy):</td><td></td><td></td><td></td><td></td><td rowspan="11">In today's environment, GE employees remain the Company's first and best line of defense in the early detection of potential compliance issues. GE has hundreds of ombudspersons around the globe to encourage the reporting of concerns without fear of retaliation.</td></tr><tr><td>Fair Employment Practices</td><td>--</td><td>957</td><td>1,028</td><td>1,094</td></tr><tr><td>Conflicts of Interest</td><td>--</td><td>451</td><td>417</td><td>465</td></tr><tr><td>International Trade Compliance</td><td>--</td><td>132</td><td>146</td><td>125</td></tr><tr><td>Securing GE Operations Globally</td><td>--</td><td>166</td><td>181</td><td>146</td></tr><tr><td>Regulatory Excellence</td><td>--</td><td>175</td><td>204</td><td>251</td></tr><tr><td>Business Records (T&L, Time & Attendance)</td><td>--</td><td>295</td><td>377</td><td>279</td></tr><tr><td>Environment, Health & Safety</td><td>--</td><td>264</td><td>232</td><td>284</td></tr><tr><td>Measurements</td><td>--</td><td>335</td><td>296</td><td>273</td></tr><tr><td>Supplier Relationships</td><td>--</td><td>436</td><td>415</td><td>347</td></tr><tr><td>Improper Payments</td><td>--</td><td>130</td><td>104</td><td>68</td></tr></table>	Indicator	Baseline	2016	2017	2018	Discussion	Workforce (a)						U.S. and Canada	--	--	--	103	Workforce changes reflect the transformation of our business portfolio to focus on our core businesses.	EMEA	--	--	--	96	Asia	--	--	--	61	Latin America	--	--	--	23	Total (thousands)	--	295	313	283		Philanthropy (o)						GE Company Contributions via GE Businesses and to the Foundation (\$M)	--	119.4	93.6	90.7	GE Foundation, the philanthropic organization of GE, is committed to transforming our communities and shaping the diverse workforce of tomorrow.	Employee and Retiree Contributions matched by GE Foundation (\$M)	--	52.1	47.3	38.8	Total GE "Family" Giving (\$M)	--	171.5	140.9	129.5	Total Contributions as a Percentage of GE Revenue is a new metric in 2018 to align with Chief Executives for Corporate Purpose Giving in Numbers annual survey.	Total Contributions as a Percentage of GE Revenue (\$M) (b)	--	0.10%	0.08%	0.07%	Governance (c)						Ombudsperson Concerns by Area (reports per policy):					In today's environment, GE employees remain the Company's first and best line of defense in the early detection of potential compliance issues. GE has hundreds of ombudspersons around the globe to encourage the reporting of concerns without fear of retaliation.	Fair Employment Practices	--	957	1,028	1,094	Conflicts of Interest	--	451	417	465	International Trade Compliance	--	132	146	125	Securing GE Operations Globally	--	166	181	146	Regulatory Excellence	--	175	204	251	Business Records (T&L, Time & Attendance)	--	295	377	279	Environment, Health & Safety	--	264	232	284	Measurements	--	335	296	273	Supplier Relationships	--	436	415	347	Improper Payments	--	130	104	68
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[p.2]

Supply Chain

Number of Global Audits	--	2,880	2,564	2,509
Total Findings	--	18,292	23,537	18,989
Average Category Findings Per Global Audit:				
Health & Safety	--	2.38	2.68	2.15
Environment	--	2.11	2.94	2.34
Emergency Preparedness	--	1.57	1.92	1.60
Labor	--	0.97	1.52	1.23
Dormitory	--	0.06	0.02	0.01
Conflict Minerals	--	0.15	0.27	0.23
Average Findings Per Regional Audit:				
China	--	7.86	8.73	8.52
Latin America	--	5.76	8.38	5.56
India	--	9.49	11.8	8.90
Europe, Middle East & Africa	--	5.19	7.57	6.13
Rest of Asia	--	5.97	7.24	5.23
North America	--	69.0	19.3	17.1
Uncategorized Countries (p)	--	5.96	7.00	4.46

Suppliers are critical partners in GE's value chain. As a global company, our supply chain includes locations where environmental, health, safety, labor, human rights, and other practices can be challenging. We expect our suppliers to comply with standards that require fair treatment of workers, a safe and healthy work environment and environmental protection. Our Supplier Integrity Guide governs all facets of our relationships with suppliers and includes specific prohibitions against forced, prison or indentured labor and subjecting workers to any form of compulsion, coercion, or human trafficking. Global audits focus on areas where there is heightened risk of these acts occurring. Suppliers in certain regions, such as North America, are included in audits, but have insufficient audit numbers for relevant average calculation. At GE, we drive better outcomes through our collaboration and partnership with suppliers and other stakeholders.

[21] Environmental, Social and Governance Results 2017 (Document)

Accessed 28/10/2019

https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2017_r13_Aug2018.pdf

[p.1]

Indicator	Baseline	2015	2016	2017
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[...]

Governance (b)

Ombudsperson Concerns by Area (reports per policy)	--			
Fair Employment Practices	--	879	957	1,028
Conflicts of Interest	--	396	451	417
International Trade Compliance	--	147	132	146
Securing GE Operations Globally	--	155	166	181
Regulatory Excellence	--	202	175	204
Business Records (T&L, Time & Attendance)	--	293	295	377
Environment, Health & Safety	--	240	264	232
Routines, Documentation, Internal Measurements	--	243	335	296
Supplier Relationships	--	265	436	415

Discussion

In today's environment, GE employees remain the Company's first and best line of defense in the early detection of potential compliance issues. GE has approximately 620 ombudspersons around the globe to encourage the reporting of concerns without fear of retaliation.

[...]

Supply Chain

Number of Global Audits	--	2,783	2,880	2,564
Total Findings	--	20,116	18,292	23,537

Average Category Findings Per Global Audit

Health & Safety	--	2.60	2.38	2.68
Environment	--	2.11	2.11	2.94
Emergency Preparedness	--	1.59	1.57	1.92
Labor	--	0.76	0.97	1.52
Dormitory	--	0.17	0.06	0.02
Conflict Minerals	--	0.10	0.15	0.27

Discussion

Suppliers are critical partners in GE's value chain. As a global company, our supply chain includes locations where environmental, health, safety, labor, human rights and other practices can be challenging. We expect our suppliers to comply with standards that require fair treatment of workers, a safe and healthy work environment and environmental protection. Our Supplier Integrity Guide governs all facets of our relationships with suppliers and includes specific prohibitions against forced, prison or indentured labor and against subjecting workers to any form of compulsion, coercion or human trafficking. Global audits focus on areas where there is high risk. Suppliers in certain regions, such as North America, are included in audits but have insufficient audit numbers for relevant average calculation. At GE, we drive better outcomes through our collaboration and partnership with suppliers and other stakeholders. 2015 and 2016 data updated for accuracy.

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
2
Comments
<p>There is evidence that the company has a policy and procedure on the use of agents, which addresses the corruption risks associated with their use. The company states that it seeks to establish and verify that the use of agents is, in each case, necessary to perform a legitimate business function. There is evidence that this policy applies to all divisions within the organisation that might employ agents, including subsidiaries and majority-controlled joint ventures.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.25] GE Aviation has a clear policy and procedure on the use of agents and other third-party intermediaries (including distributors, brokers, consultants, sales partners, and lobbyists) who act on GE Aviation's behalf or with GE Aviation to promote, market, and sell our products and services. These policies and procedures address the corruption risks associated with the use of third parties and</p> <p>[p.26] provide details of specific controls to mitigate these risks, and include the GE Aviation Intermediary Procedure, GE Improper Payments Policy, GE Improper Payments Implementing Procedures, GE Onboarding Due Diligence Policy, GE Aviation Business Courtesy Procedure, GE Controllorship Policy, GE Travel & Living Policy, GE Political Contributions Policy, and GE Lobbying Disclosure Policy. As part of these policies and procedures, GE Aviation commits to establishing and verifying that the use of an agent is, in each case, necessary to perform a legitimate business function.</p> <p>GE Aviation has a dedicated third-party risk owner who manages third-party intermediary policies and procedures and oversees the rigorous screening, training, and approval process that every intermediary must go through prior to onboarding, periodically by policy, any time there is a significant change in the business relationship or a contract expiration/renewal. GE Aviation has refused and/or terminated relationships pursuant to this process as a result of red flags found in due diligence, inherent risks in the geographic location of the proposed territory, or other risks GE Aviation believe cannot be effectively ameliorated. GE Aviation believes certain aspects of these policies and procedures are more effective at combatting corruption when maintained as confidential to GE.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf [p.5] The Spirit & The Letter must be followed by anyone who works for or represents GE.</p> <p>THIS INCLUDES >></p> <ul style="list-style-type: none"> • GE directors, officers and employees. • Subsidiaries and controlled affiliates. Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies. <p>Non-controlled affiliates should be encouraged to adopt and follow GE compliance policies.</p>

GE employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors must:

- Require these parties to agree to comply with relevant aspects of GE's compliance policies.

[p.10] IMPROPER PAYMENTS

We maintain strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on GE's behalf in business dealings.

We maintain accurate books, records, and accounts that correctly reflect the true nature of all transactions.

[...]

- Treat with extreme caution a demand from a third party to receive its commission payment prior to winning a deal/contract.
- Be wary of any suggestion to direct GE business through a specific representative or partner due to a "special relationship."
- Be suspicious of any request to make a payment to a person who is not related to the transaction being discussed — or a request that payments be made in another country.
- Watch out for commissions that seem too large in relation to the services provided.

[p.13] OUR POLICY

GE is committed to complying with applicable anti-money laundering, corruption and terrorist financing laws and regulations.

GE conducts business only with customers involved in legitimate business activities, with funds derived from legitimate sources.

[3] Jan 2019 Anti-Corruption Fact Sheet (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf

[p.1] Anticorruption

GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.

GE's approach to compliance in this critical area is multifaceted. Among its key features are:

[p.1]

- Robust internal controls and accounting processes designed to detect and prevent violations of Company policy relating to improper payment risks and to ensure accurate books and records relating to transactions

Question
7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?
Score
2
Comments
<p>There is evidence that the company has formal procedures to conduct risk-based anti-bribery and corruption due diligence prior to engaging and re-engaging its third parties and agents and when there is a significant change in the business relationship. The company also states that agents and higher risk intermediaries are subject to enhanced due diligence requirements. There is evidence that the company commits to not engaging or terminating its engagement with agents or intermediaries where the risks identified in the due diligence process cannot be mitigated.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.20] GE Aviation has formal procedures to conduct risk-based anti-bribery and corruption due diligence prior to engaging or re-engaging any agents and other third-party intermediaries. GE Aviation performs this process periodically according to its policy and any time there is a significant change in the business relationship or a contract expiration and/or renewal. High risk agents and other third party intermediaries are subject to additional due diligence requirements. GE Aviation does not engage intermediaries where the risks identified in the due diligence cannot be sufficiently mitigated, and terminates engagement if such risks develop later or new red flags warranting termination are brought to its attention.</p> <p>GE Aviation implements these procedures through the GE Aviation Intermediary Procedure, GE Improper Payments Policy, GE Improper Payments Implementing Procedures, GE Onboarding Due Diligence Policy, GE Aviation Business Courtesy Procedure, GE Controllership Policy, GE Travel & Living Policy, GE Political Contributions Policy, and GE Lobbying Disclosure Policy. GE Aviation believes certain aspects of these policies and procedures are more effective at combatting corruption when maintained as confidential to GE.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf [p.10] Follow your business due diligence procedures and require that any third party representing GE be carefully selected and comply with this policy.</p> <p>[3] Jan 2019 Anti-Corruption Fact Sheet (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf [p.1] Anticorruption</p> <p>GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.</p> <p>GE's approach to compliance in this critical area is multifaceted. Among its key features are:</p> <p>[...]</p> <ul style="list-style-type: none"> • Extensive controls, including thorough due diligence, careful screening and training on GE policies for third-party intermediaries such as distributors, service providers, and commercial agents and representatives

Question
7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?
Score
2
Comments
<p>There is evidence that the company has formal procedures in place to establish the beneficial ownership of agents prior to engaging them and when there is a significant change in the business relationship. There is evidence the company operates a risk-based beneficial ownership verification policy. There is evidence indicating that the company will not engage or will terminate its engagement with agents or intermediaries where ultimate beneficial ownership cannot be established.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.27] GE Aviation has formal, risk-based procedures to establish the beneficial ownership of agents and other intermediaries. GE Aviation requires agents and other intermediaries to disclose their ownership, and verifies this information according to a risk-based approach. GE Aviation performs this function before establishing a relationship with an agent or intermediary, at periodic intervals throughout the business relationship, at the renewal of any business relationship, any time there is a significant change in the business relationship, upon the change in control of the agent or other intermediary, and if a red flag or integrity concern involving beneficial ownership is identified. GE Aviation declines to engage or terminates engagements with agents and other intermediaries where ownership information, or the lack thereof, identifies red flags warranting termination. GE Aviation believes certain aspects of these procedures are more effective at combatting corruption when maintained as confidential to GE.</p> </p>

Question
7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?
Score
2
Comments
<p>There is evidence that the company's anti-bribery and corruption policy applies to all agents and intermediaries acting for or on its behalf. There is evidence that agents and intermediaries are subject to anti-bribery and corruption clauses in their contracts, which include audit rights and termination rights to detect, control and prevent breaches.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.1] GE's Improper Payments Policy, and other Compliance policies that prohibit bribery, explicitly apply to and must be followed by anyone who works for or represents GE, including GE directors, officers, leaders and employees, employees of subsidiaries and entities which GE controls, and third parties such as consultants, agents, sales representatives, distributors and independent contractors.</p> <p>[p.28] GE Aviation's anti-bribery and corruption policy applies to any non-GE person or entity—including agents and other intermediaries—that acts on GE Aviation's behalf or with GE Aviation to promote, market, and sell its products and services. GE Aviation requires all agents and other intermediaries to include anti-bribery and corruption clauses in their contracts. In addition, GE Aviation requires all contracts with agents and other intermediaries to include the right for GE Aviation to be informed of compliance with anti-bribery and corruption clauses, to audit compliance thereof, and to terminate such contracts for breach thereof. In addition, GE Aviation requires all contracts with agents and other intermediaries to include the right for GE Aviation to suspend payments and terminate the engagement for breach of anti-bribery and corruption requirements.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>[p.5] The Spirit & The Letter must be followed by anyone who works for or represents GE.</p> <p>THIS INCLUDES >></p> <ul style="list-style-type: none"> • GE directors, officers and employees. • Subsidiaries and controlled affiliates. <p>Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies.</p> <p>Non-controlled affiliates should be encouraged to adopt and follow GE compliance policies.</p> <p>GE employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors must:</p> <ul style="list-style-type: none"> • Require these parties to agree to comply with relevant aspects of GE's compliance policies. • Provide these parties with education and information about policy requirements. • Take action, up to and including terminating a contract, after learning that a third party failed to abide by GE's compliance policies.

[p.10] Follow your business due diligence procedures and require that any third party representing GE be carefully selected and comply with this policy.

[3] Jan 2019 Anti-Corruption Fact Sheet (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf

[p.1] Anticorruption

GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.

GE's approach to compliance in this critical area is multifaceted. Among its key features are:

- Corporate policies and procedures that reflect the Company's approach by prohibiting improper payments in every transaction, whether with a government or with a private party
- Extensive controls, including thorough due diligence, careful screening and training on GE policies for third-party intermediaries such as distributors, service providers, and commercial agents and representatives

[2] Integrity Guide for Suppliers Contractors and Consultants (Document)

Accessed 27/10/2019

<http://www.gesupplier.com/html/SuppliersIntegrityGuide/download/GE%20Integrity%20Guide%20for%20Suppliers-EN.pdf>

[p.1] A Message from GE

The General Electric Company ("GE") is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with GE suppliers, contractors, consortium partners and consultants (collectively "Suppliers"). GE bases its Supplier relationships on lawful, efficient and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this GE Integrity Guide for Suppliers, Contractors and Consultants (the "Guide") in connection with their activities for GE.

Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
1
Comments
<p>There is some evidence that the company highlights and addresses incentive structures for agents as a factor in bribery and corruption risk. The company indicates that payments to agents are based on market rates and that payments are made according to clear milestones.</p> <p>However, the company receives a score of '1' because there is no publicly available evidence that incentives or commission payments must be proportionate to the net fee or that payments must be made into local bank accounts.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.28] As part of GE Aviation's comprehensive review and approval process for agents and other intermediaries, the compensation terms and other incentive schemes are designed and evaluated to promote ethical behavior and discourage corrupt practices. Commissions, discounts and other incentive schemes are reviewed, evaluated for risk, and limited pursuant to policy controls. Payments are made over the course of contracts based on clearly-defined milestones, including hourly rates, the closing of legitimate transactions, or retainers that are reasonable based upon market rates. In addition, GE Aviation requires all contracts with agents and other intermediaries to include the right for GE Aviation to suspend payments and terminate the engagement for breach of anti-bribery and corruption requirements.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf <p>[p.5] The Spirit & The Letter must be followed by anyone who works for or represents GE.</p> <p>Non-controlled affiliates should be encouraged to adopt and follow GE compliance policies.</p> <p>GE employees working with third parties such as consultants, agents, sales representatives, distributors and independent contractors must:</p> <ul style="list-style-type: none"> Require these parties to agree to comply with relevant aspects of GE's compliance policies. <p>[p.10] IMPROPER PAYMENTS</p> <p>[...]</p> <p>We maintain strong controls aimed at preventing and detecting bribery. This includes a rigorous process for appointing and managing third parties acting on GE's behalf in business dealings.</p> <p>We maintain accurate books, records, and accounts that correctly reflect the true nature of all transactions.</p> <p>[...]</p> <ul style="list-style-type: none"> Treat with extreme caution a demand from a third party to receive its commission payment prior to winning a deal/contract. Be wary of any suggestion to direct GE business through a specific representative or partner due to a "special relationship." </p></p>

- Be suspicious of any request to make a payment to a person who is not related to the transaction being discussed — or a request that payments be made in another country.
- Watch out for commissions that seem too large in relation to the services provided.

[p.13] OUR POLICY

GE is committed to complying with applicable anti-money laundering, corruption and terrorist financing laws and regulations.

GE conducts business only with customers involved in legitimate business activities, with funds derived from legitimate sources.

[3] Jan 2019 Anti-Corruption Fact Sheet (Document)

Accessed 25/10/2019

https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf

[p.1] Anticorruption

GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.

GE's approach to compliance in this critical area is multifaceted. Among its key features are:

- Robust internal controls and accounting processes designed to detect and prevent violations of Company policy relating to improper payment risks and to ensure accurate books and records relating to transactions

Question
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the agents currently contracted to act for or on its behalf. The company states that it does not publish such information.
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.28] GE is a large, multi-national company public company. GE discloses third-party relationships as required by public disclosure and reporting requirements in filings with the United States Securities and Exchange Commission (SEC) and via the GE Investor Relations website. To comply with laws and contract requirements involving classified, proprietary, and confidential information and programs, GE Aviation does not publish details of all agents contracted to act with and on behalf of the company.</p>

Question																																								
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?																																								
Score																																								
0																																								
Comments																																								
There is no clear evidence that the company publishes high-level data from all ethical or bribery and corruption-related incidents and investigations involving its agents. The company publishes data on corruption-related investigations and disciplinary actions involving its entire workforce, but there is no evidence that it disaggregates this information to specifically show any investigations and actions against agents.																																								
Evidence																																								
<p>[39] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.29] GE publishes high-level results from incident investigations, including for improper payments (ethical, bribery or corruption-related investigations involving agents), and disciplinary actions at all levels on a yearly basis.</p> <p>[39] Environmental Social and Governance Results 2018 (Document) Accessed 19/03/2020 https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2018_r11_Sep2019.pdf[p.1] Governance B Ombudsperson Concerns by Area (reports per policy):</p> <table><tr><td>Violation of Law</td><td>--</td><td>43</td><td>22</td><td>25</td></tr><tr><td>Other Integrity Concerns (d)</td><td>--</td><td>144</td><td>115</td><td>117</td></tr><tr><td>Total Concerns Reported (e)</td><td>--</td><td>4,481</td><td>4,441</td><td>4,411</td></tr><tr><td>Disciplinary Actions (f)</td><td>--</td><td>1,376</td><td>1,423</td><td>1,098</td></tr><tr><td>Investigations Conducted, U.S. and Canada (% Total)</td><td>--</td><td>33%</td><td>33%</td><td>35%</td></tr><tr><td>Investigations Conducted, EMEA (% Total)</td><td>--</td><td>33%</td><td>31%</td><td>21%</td></tr><tr><td>Investigations Conducted, Asia (% Total)</td><td>--</td><td>18%</td><td>20%</td><td>23%</td></tr><tr><td>Total)</td><td>--</td><td>17%</td><td>17%</td><td>14%</td></tr></table>	Violation of Law	--	43	22	25	Other Integrity Concerns (d)	--	144	115	117	Total Concerns Reported (e)	--	4,481	4,441	4,411	Disciplinary Actions (f)	--	1,376	1,423	1,098	Investigations Conducted, U.S. and Canada (% Total)	--	33%	33%	35%	Investigations Conducted, EMEA (% Total)	--	33%	31%	21%	Investigations Conducted, Asia (% Total)	--	18%	20%	23%	Total)	--	17%	17%	14%
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In today's environment, GE employees remain the Company's first and best line of defense in the early detection of potential compliance issues. GE has hundreds of ombudspersons around the globe to encourage the reporting of concerns without fear of retaliation.																																								

7.2 Joint Ventures

Question
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?
Score
1
Comments
<p>There is evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence prior to entering into, and while operating as part of, joint ventures. The company indicates that due diligence on joint ventures includes establishing ultimate beneficial ownership of the partner company and that high-risk potential partners are subject to enhanced due diligence.</p> <p>However, the company receives a score of '1' because there is no clear evidence that the company repeats due diligence at least every two years or when there is a significant change in the business relationship.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.29] GE Aviation conducts risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures. This includes establishing the ultimate beneficial ownership of the partner company, with enhanced due diligence for joint ventures operating in high risk countries or with high risk partners, such as state-owned enterprises.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf [p.10] Follow your business due diligence procedures and require that any third party representing GE be carefully selected and comply with this policy.</p> <p>[3] Jan 2019 Anti-Corruption Fact Sheet (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf [p.1] GE has long taken a leading role in pushing for transparency and integrity in the global marketplace. Our policy against improper payments in business transactions is a key element of our code of conduct—The Spirit & The Letter— and represents a core belief in how we do business.</p> <p>GE's approach to compliance in this critical area is multifaceted. Among its key features are:</p> <p>[...]</p> <ul style="list-style-type: none"> • Extensive controls, including thorough due diligence, careful screening and training on GE policies for third-party intermediaries such as distributors, service providers, and commercial agents and representatives <p>[...]</p> <ul style="list-style-type: none"> • Increased emphasis and enhanced due diligence concerning improper risk associated with mergers, acquisitions and joint ventures

Question
7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?
Score
1
Comments
<p>There is evidence that the company commits to establishing and implementing anti-bribery and corruption policies in all of its joint ventures. The company requires its majority controlled joint ventures to adopt and follow its anti-corruption policies and states that it will encourage non-controlled ventures to do the same.</p> <p>However, the company receives a score of '1' because there is no evidence that includes audit and termination rights in its contracts with joint venture partners to detect, control and prevent breaches.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.22] Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies, including its anti-bribery and anti-corruption policies. Non-controlled affiliates are encouraged to adopt and follow GE compliance policies.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf [p.5] The Spirit & The Letter must be followed by anyone who works for or represents GE.</p> <p>THIS INCLUDES >></p> <ul style="list-style-type: none"> • GE directors, officers and employees. • Subsidiaries and controlled affiliates. <p>Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies.</p> <p>Non-controlled affiliates should be encouraged to adopt and follow GE compliance policies.</p> <p>[2] Integrity Guide for Suppliers Contractors and Consultants (Document) Accessed 27/10/2019 http://www.gesupplier.com/html/SuppliersIntegrityGuide/download/GE%20Integrity%20Guide%20for%20Suppliers-EN.pdf [p.1] Supplier Integrity Guide: Revised February 21, 2018</p> <p>This guide also applies to Consortium Partners</p> <p>A Message from GE The General Electric Company ("GE") is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with GE suppliers, contractors, consortium partners and consultants (collectively "Suppliers"). GE bases its Supplier relationships on lawful, efficient and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this GE Integrity Guide for Suppliers, Contractors and Consultants (the "Guide") in connection with their activities for GE.</p> <p>Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in this Guide and in other contractual obligations to GE. Please contact the GE manager you work with or any GE Compliance Resource if you have any questions about this Guide or the standards of business conduct that all GE Suppliers must meet.</p>

Question
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
Score
0
Comments
<p>There is no clear publicly available evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures. The company indicates that majority controlled joint ventures must adopt and follow its anti-corruption policies and states that it encourages non-controlled entities to do the same, but does not provide any further information or practical details of how it assures itself of this in practice.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.29] Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies, including its antibribery and anti-corruption policies. Non-controlled affiliates are encouraged to adopt and follow GE compliance policies.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf [p.5] The Spirit & The Letter must be followed by anyone who works for or represents GE.</p> <p>THIS INCLUDES >></p> <ul style="list-style-type: none"> • GE directors, officers and employees. • Subsidiaries and controlled affiliates. <p>Entities in which GE owns more than 50 percent of voting rights, or which GE has the right to control, are required to adopt and follow GE compliance policies.</p> <p>Non-controlled affiliates should be encouraged to adopt and follow GE compliance policies.</p> <p>[2] Integrity Guide for Suppliers Contractors and Consultants (Document) Accessed 27/10/2019 http://www.gesupplier.com/html/SuppliersIntegrityGuide/download/GE%20Integrity%20Guide%20for%20Suppliers-EN.pdf [p.1] Supplier Integrity Guide: Revised February 21, 2018</p> <p>This guide also applies to Consortium Partners</p> <p>A Message from GE</p> <p>The General Electric Company ("GE") is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with GE suppliers, contractors, consortium partners and consultants (collectively "Suppliers"). GE bases its Supplier relationships on lawful, efficient and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this GE Integrity Guide for Suppliers, Contractors and Consultants (the "Guide") in connection with their activities for GE.</p> <p>Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers and subcontractors comply with the standards of conduct set out in this Guide and in other contractual obligations to GE. Please contact the GE manager you work with or any GE Compliance Resource if you have any questions about this Guide or the standards of business conduct that all GE Suppliers must meet.</p>

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
2
Comments
<p>There is evidence that the company has policies and procedures in place to address the corruption risks associated with offset contracting. The company states that it has a dedicated Offset Team responsible for the monitoring and oversight of the company's offset activities and any potential risks throughout the lifecycle of the project. In addition, there is also evidence that all employees within this team receive tailored anti-bribery and corruption training to perform this function.</p>
Evidence
<p>[39] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.30] GE Aviation explicitly addresses corruption risks associated with offset contracting. GE Aviation has a dedicated Offset team. On an annual basis, the offset team members must review and re-commit to the companies' compliance policies and receive training on compliance risks and the company's Ombuds process. Compliance oversight and corruption risks associated with offset contracting are addressed by internal controls that include a rigorous review process that requires approvals from senior company executives and appropriate compliance personnel. GE Aviation has a robust and transparent system to manage the full life cycle of offset activities through a tracking tool. Every sale is managed through four primary stages: Prospect, Proposal, Negotiation, Win/Execution. Any International customer triggers a verification by a dedicated regional offset director. The acceptance of an offset obligation requires business approval at the VP or President level (depending on valuation). The life cycle management of the obligation is then tracked from prospect, development and execution (including cost, status and Customer Connect) through the tracking of Offset credit approvals by the specific country's offset authority. GE Aviation does not make a practice of contracting 'Offset Partners' for fulfillment of a GE obligation.</p> </p>

Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
2
Comments
<p>There is evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations. As part of this process, the company commits to establishing and verifying the legitimacy of the proposed offset activity or investment and to mitigating any possible conflicts of interest. There is evidence that the company refreshes due diligence when there is a significant change in the business relationship. Although the company does not explicitly mention beneficial ownership, it provides sufficient evidence that it checks the beneficiaries of projects and there is accompanying information on beneficial ownership checks as part of its third party due diligence processes, so the company can receive a score of '2'.</p>
Evidence
<p>[39] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf</p> <p>[p.27] GE Aviation has formal, risk-based procedures to establish the beneficial ownership of agents and other intermediaries. GE Aviation requires agents and other intermediaries to disclose their ownership, and verifies this information according to a risk-based approach. GE Aviation performs this function before establishing a relationship with an agent or intermediary, at periodic intervals throughout the business relationship, at the renewal of any business relationship, any time there is a significant change in the business relationship, upon the change in control of the agent or other intermediary, and if a red flag or integrity concern involving beneficial ownership is identified.</p> <p>[p.29] GE Aviation conducts risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures. This includes establishing the ultimate beneficial ownership of the partner company, with enhanced due diligence for joint ventures operating in high risk countries or with high risk partners, such as state-owned enterprises.</p> <p>[p.30] GE Aviation has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on key aspects of its offset obligations. This process specifically includes due diligence checks on parties involved in offset transactions through rigorous on-boarding processes for customers and suppliers. As part of this process, the company's policy also commits to establishing and verifying that the offset obligation proposed is founded on a legitimate rationale through formal internal reviews that include company executives. The company refreshes this due diligence periodically, whenever there is a significant change in the business relationship or if there is any cause for concern. GE Aviation, as part of the offset project ...</p> <p>[p.31] ... development, utilizes a dedicated portal to approve the beneficiary of any project. If a beneficiary is not approved in this portal, the offset manager initiates the approval process and does not proceed until approval is obtained. The approval is documented within GE Aviation's tracking tool. In order to mitigate conflicts of interest in beneficiaries, GE Aviation reviews the origination of the project; for example, was the project generated by a GE employee (without any external influence) or was the project brought to GE by a non-GE interested party. Any potential project generated by a non-GE employee, would require special attention and due diligence to mitigate a conflict of interest.</p> <p>[1] GE Code of Conduct (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf</p> <p>[p.10] Follow your business due diligence procedures and require that any third party representing GE be carefully selected and comply with this policy.</p>

Question
8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?
Score
N/A
Comments
The company publishes a statement that it does not engage brokers or agents as part of its offset activities. The company is therefore exempt from scoring on this question.
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.31] GE Aviation's offset function does not engage brokers or offset agents to act on behalf of the company. The company's dedicated Offset team members generate and execute both direct and indirect offset transactions directly with the offset transaction recipients/partners and interact directly with the customer or the governing offset authority.</p>

Question
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?
Score
0
Comments
There is no evidence that the company publishes any details of its offset obligations or contracts. The company states that it may communicate this information on a case by case basis, but there is no evidence that it has made such disclosures.
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.31] At the discretion of GE and its Customer, GE Aviation will decide on a case by case basis if the details of an Offset transaction warrant a public communication to share the value that the Offset transaction has delivered to the customer and/or the region involved.</p>

9. High Risk Markets

Question
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
Score
2
Comments
<p>There is evidence that the company acknowledges the corruption risks associated with operating in different markets, and there is evidence that it has an assessment process in place to account for these specific risks, with risk management procedures in place. There is evidence that the results of risk assessments have a direct impact on business decisions and inform the development and implementation of additional controls. The company provides examples of such controls.</p>
Evidence
<p>[37] Commitment to Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf <p>[p.31] GE Aviation acknowledges the corruption risks associated with operating in different markets. It has internal policies and procedures in place that consider these specific risks including but not limited to specialized customer, supplier, and third-party intermediary diligence depending on a country's inherent corruption risk. Inherent corruption risk is determined through analysis of multiple factors including reference to independent third-party analyses, such as the Transparency International Corruption Perceptions Index, and current geopolitical climate.</p> <p>The results of these risk assessments have a direct impact on business decisions and inform the development and implementation of additional controls; they may even lead to termination of or refusal to initiate a customer, third party, supplier relationship. Other controls might include an added layer of compliance review of invoices outside the sales pipeline, ban on certain payment structures more amenable to corruption, or other action tailored to the specific compliance risk.</p> </p> <p>[11] GE Integrity Homepage (Webpage) Accessed 25/10/2019 https://www.ge.com/sustainability/integrity Global Reach</p> <p>It's increasingly important to get the balance right between local and global processes. GE relies on key controls and input from regional experts to ensure compliance is achieved everywhere GE operates.</p> <p>[3] Jan 2019 Anti-Corruption Fact Sheet (Document) Accessed 25/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf <p>[p.1] The Importance of Strong Anticorruption Compliance</p> <p>Greater attention is being paid to the effectiveness of corporate compliance programs in preventing improper payments. The Justice Department and the SEC have issued a resource guide on the US Foreign Corrupt Practices Act (FCPA) that endorses a strong compliance program. The UK Bribery Act and the US Sentencing Guidelines similarly highlight the need for a strong program. As part of the compliance program at GE, operating with a strong anti-corruption program is a critical component in how we do business.</p> <p>[p.2] Never before have the risks been greater. Aggressive enforcement of the FCPA by the SEC and the US Department of Justice remains the norm. Enforcement is not limited to companies; individuals increasingly face prosecution and lengthy terms of imprisonment for breaking the law. Prosecutors continue to broaden their reach across the commercial sector, focusing on healthcare, energy, oil and gas, software, financial services and telecommunications, and across developing and emerging markets such as those in China, India, Russia, Mexico, Brazil, the Middle East, and Africa, where GE has a notable presence.</p> </p>

These trends are not limited to the United States. Global enforcement of anticorruption laws is increasing, enforcement actions are increasingly coordinated and interconnected, and sometimes a single transaction can expose a company to prosecution in multiple jurisdictions. GE closely monitors these developments to ensure that our global compliance program and internal controls address these evolving risks and enforcement trends. The Company is firmly committed to ethical behavior in all of our business practices.

[21] Environmental, Social and Governance Results 2017 (Document)

Accessed 28/10/2019

https://www.ge.com/sustainability/sites/default/files/GE_ESG_KPIs_RY2017_r13_Aug2018.pdf

[p.1] Suppliers are critical partners in GE's value chain. As a global company, our supply chain includes locations where environmental, health, safety, labor, human rights and other practices can be challenging. We expect our suppliers to comply with standards that require fair treatment of workers, a safe and healthy work environment and environmental protection. Our Supplier Integrity Guide governs all facets of our relationships with suppliers and includes specific prohibitions against forced, prison or indentured labor and against subjecting workers to any form of compulsion, coercion or human trafficking. Global audits focus on areas where there is high risk. Suppliers in certain regions, such as North America, are included in audits but have insufficient audit numbers for relevant average calculation.

Question

9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?

Score

1

Comments

There is evidence that the company publishes a list of its fully consolidated subsidiaries. For each entity, the company publishes information on the percentage ownership and country of incorporation. There is evidence that this information is published and updated on an annual basis.

However, the company receives a score of '1' because there is no evidence that it publishes the country or countries of operation for each entity. There is also evidence to indicate that this list only shows principal affiliates as opposed to a comprehensive list of all of the company's fully consolidated and non-fully consolidated holdings.

Evidence**[46] 2018 10-K Form – Exhibit 21 (Webpage)**

Accessed 09/04/2020

<https://www.sec.gov/Archives/edgar/data/40545/000004054519000014/geform10-k2018xex21.htm>

SUBSIDIARIES OF REGISTRANT

General Electric's principal affiliates as of December 31, 2018, are listed below. All other affiliates, if considered in the aggregate as a single affiliate, would not constitute a significant subsidiary.

AFFILIATES OF REGISTRANT INCLUDED IN REGISTRANT'S FINANCIAL STATEMENTS

	Percentage of voting securities directly or indirectly owned by registrant (%)	State or Country of incorporation or organization
ALSTOM Power Systems	100	France
ALSTOM UK Holdings Ltd.	100	United Kingdom & Northern Ireland
Amersham Health Norge AS	100	Norway
Baker Hughes, a GE company, LLC	50	Delaware
Bentley Nevada, LLC	50	Delaware
CALGEN Holdings, Inc.	100	Delaware
Cardinal Cogen, Inc.	100	Delaware
Caribe GE International of Puerto Rico, Inc.	100	Puerto Rico
Concept Laser GmbH	75	Germany
Datex-Ohmeda, Inc.	100	Delaware
Dresser, LLC	50	Delaware
Druck, LLC	50	Connecticut
FieldCore Service, Inc.	100	Delaware
GE Aero Energy Power, LLC	100	Delaware
GE Albany CH GmbH	100	Switzerland
GE Albany C.V.	100	Netherlands
GE Albany Global Holdings BV	100	Netherlands
GE Albany US Holdings LLC	100	Delaware
GE Aviation Systems Group Limited	100	United Kingdom & Northern Ireland
GE Aviation Systems North America LLC	100	Delaware
GE Aviation UK	100	United Kingdom & Northern Ireland
GE Caledonian Limited	100	United Kingdom & Northern Ireland
GE Canada Holdings, Inc.	100	Delaware
GE Capital Fleet Services International Holdings, LLC	100	Delaware
GE Capital Global Financial Holdings, LLC	100	Connecticut
GE Capital Global Holdings, LLC	100	Delaware
GE Capital UK Finance	100	United Kingdom & Northern Ireland
GE Celma LTDA	100	Brazil
GE Digital Holdings LLC	100	Delaware
GE Drives & Controls, Inc.	100	Delaware
GE Druck Holdings Limited	50	United Kingdom & Northern Ireland
GE Energias Renovaveis Ltda.	75	Brazil
GE Energy Europe B.V.	50	Netherlands
GE Energy Netherlands, B.V.	100	Netherlands
GE Energy Parts, Inc.	100	Delaware
GE Energy Power Conversion GmbH	100	Germany
GE Energy Power Conversion Group	100	France
GE Energy Power Conversion UK Holdings Limited	100	United Kingdom & Northern Ireland

[List continues over 3 pages]

Question**9.3 Does the company disclose its beneficial ownership and control structure?****Score****2****Comments**

There is evidence that the company is a subsidiary of General Electric, which is publicly listed on the New York Stock Exchange. The company is therefore not required to disclose further information on its beneficial ownership to receive a score of '2'. In addition, the company publishes details of its two major shareholders with a stake over 5% in its corporate reporting documents.

Evidence**[18] FT Markets Data GE Co (Webpage)**

Accessed 28/10/2019

<https://markets.ft.com/data/equities/tearsheet/summary?s=GE:NYQ>
**[15] 2019 Proxy Statement (Document)**

Accessed 28/10/2019

https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf

[p.27]

5% Beneficial Owners	Common Stock
BlackRock, Inc.	534,092,757
The Vanguard Group	652,363,722
Total	1,186,456,479

PERCENTAGE OWNERSHIP

- No director or named executive owns more than one-tenth of 1% of the total outstanding shares of GE common stock, other than Mr. Garden, who may be deemed to indirectly beneficially own 0.8% of our outstanding shares as a result of his affiliation with Trian (see note 1 below).
- BlackRock and Vanguard own 6.1% and 7.5%, respectively, of our total outstanding shares.

[37] Commitment to Compliance (Document)

Accessed 18/12/2019

<https://www.geaviation.com/sites/default/files/General%20Electric%20Aviation%20Commitment%20to%20Compliance%202019.pdf>

[p.25] GE is a large, multi-national company public company and is publicly traded on the New York Stock Exchange (NYSE) as "GE." GE discloses ownership and control structure as part of its public disclosure and reporting requirements in filings with the United States Securities and Exchange Commission (SEC) and via the GE Investor Relations website.

[20] Open Ownership Profile GE Co (Webpage)

Accessed 28/10/2019

<https://register.openownership.org/entities/5aba61e99dfc3fae18ef8eac>


GENERAL ELECTRIC COMPANY

 New York (United States of America) [Legal entity](#)

COMPANY NUMBER
N/A

OPTIONS | Transliterate  | Report incorrect data 

Beneficial owners of GENERAL ELECTRIC COMPANY

 View as graph

UNKNOWN

Interests unknown

Details >

ADDRESS

3135, Easton Turnpike, Fairfield, Connecticut, 10017

PROVENANCE

UK PSC Register


Latest data: 2019-10-16

[See the original source record](#)


OpenCorporates data not available

MORE ON GENERAL ELECTRIC COMPANY

Google 

Report incorrect data 

Companies controlled by GENERAL ELECTRIC COMPANY

 View as graph

Displaying 1 company

 GREATER EUROPE OPPORTUNISTIC PROPERTY FUND (B FEEDER) L.P. United Kingdom (2007-07-24 -) 

50 Lothian Road, Festival Square, Edinburgh, EH3 9WJ

Started on 2017-06-26

Interests unknown

Details >

Question												
9.4 Does the company publish a percentage breakdown of its defence sales by customer?												
Score												
0												
Comments												
<p>There is evidence that the company publishes some information on its defence sales, to indicate that the United States government accounts for 5% of its total revenue and that defence-related sales account for 5% of its total revenue. There is some indication that the company provides products and services for Airbus and Boeing.</p> <p>The company receives a score of '0' because it does not publish clear information about the main recipients of its defence sales, to indicate the customers for approximately 50% of its defence sales.</p>												
Evidence												
<p>[39] Commitment To Compliance (Document) Accessed 08/04/2020 https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf [p.33] GE is a large, multi-national company public company. GE discloses its defense industry sales as required by public disclosure and reporting requirements in filings with the United States Securities and Exchange Commission (SEC) and via the GE Investor Relations website. To comply with laws and contract requirements involving classified, proprietary, and confidential information and programs, GE does not publish all details of defense industry sales.</p> <p>[17] 2018 10-K Form (Document) Accessed 28/10/2019 https://www.ge.com/investor-relations/sites/default/files/GE_AR18_10k.pdf [p.69] Sales of goods and services to agencies of the U.S. Government as a percentage of GE revenues follow.</p> <table><tr><th></th><th>2018</th><th>2017</th><th>2016</th></tr><tr><td>Total sales to U.S. Government agencies</td><td>4%</td><td>4%</td><td>3%</td></tr><tr><td>Aviation segment defense-related sales</td><td>3%</td><td>3%</td><td>3%</td></tr></table> <p>[22] Government Business (Document) Accessed 28/10/2019 https://www.ge.com/sustainability/sites/default/files/GEA33644_Governance_Government_Business_R6HR.pdf [p.1] GE does business with a wide spectrum of federal, state and local governments, as well as with government contractors. The breadth of our government-business portfolio has grown in recent years through a series of acquisitions, primarily in the aviation and power businesses. While maintaining our focus on private-sector customers, we recognize that our managers and employees also must have a thorough understanding of the special requirements of our government customers.</p> <p>[40] 2019 Annual Report (Document) Accessed 08/04/2020 https://www.ge.com/investor-relations/sites/default/files/GE_AR19_AnnualReport.pdf [p.6] AVIATION</p> <p>Aviation delivered strong performance, closing its 100th year of operation with over \$270 billion in backlog and an installed base of more than 64,000 commercial and military engines.</p> <p>[...] Our team worked diligently to support our customers following the grounding of the Boeing 737 MAX, never wavering in their commitment to safety while navigating near-term industry disruption. LEAP continues to be a strong engine program for us, and we delivered 1,736 LEAP engines to Airbus and Boeing platforms in the year.</p> <p>Aviation's long-term end-market fundamentals remain attractive, and the team is introducing advanced technologies in growing commercial and military markets. For example, in commercial markets, Aviation's newly certified Passport™ engine powered Bombardier's record-breaking flight between Sydney and Detroit in October, and the GE9X™—the world's largest, most powerful jet engine—is on track for certification in 2020. In military, Aviation's</p>		2018	2017	2016	Total sales to U.S. Government agencies	4%	4%	3%	Aviation segment defense-related sales	3%	3%	3%
	2018	2017	2016									
Total sales to U.S. Government agencies	4%	4%	3%									
Aviation segment defense-related sales	3%	3%	3%									

new T901 was selected for the U.S. Army's Improved Turbine Engine Program to power its next-generation Apache & Black Hawk helicopters.

[p.15] Revenues are classified according to the region to which products and services are sold. For purposes of this analysis, the U.S. is presented separately from the remainder of the Americas.

(Dollars in billions)				V%	
	2019	2018	2017	2019-2018	2018-2017
U.S.	\$ 39.4	\$ 40.0	\$ 41.5	(2) %	(4) %
Non-U.S.					
Europe	19.1	19.8	18.7		
Asia	20.2	19.3	18.3		
Americas	6.3	7.9	7.8		
Middle East and Africa	10.3	10.1	13.0		
Total Non-U.S.	\$ 55.8	\$ 57.1	\$ 57.8	(2) %	(1) %
Total geographic revenues	\$ 95.2	\$ 97.0	\$ 99.3	(2) %	(2) %
Non-U.S. revenues as a % of consolidated revenues	59%	59%	58%		

[p.21] AVIATION

Products & Services. Aviation designs and produces commercial and military aircraft engines, integrated digital components, electric power and mechanical aircraft systems. We also provide aftermarket services to support our products.

[...] Military – manufactures jet engines for military airframes. Our military engines power a wide variety of military aircraft including fighters, bombers, tankers, helicopters and surveillance aircraft, as well as marine applications. We provide maintenance, component repair and overhaul services, including sales of replacement parts. Our military engine installed base was approximately 26,600 units as of December 31, 2019.

[p.22] As it relates to the military environment, the U.S. Department of Defense has increased its budget and foreign governments have increased spending to upgrade and modernize their existing fleets, creating future opportunities. Military shipments grew to 717 engines in 2019 from 674 engines in 2018. In 2019, the United States Army awarded Aviation a contract for its T901 engine as the replacement engine for the Army's Apache and Black Hawk helicopters, and in 2018 the United States Air Force selected Boeing as the contractor to produce 351 new advanced T-7A Red Hawk trainer aircraft powered by Aviation's F404 engine.

(In units, except where noted)	Orders		Sales	
	2019	2018	2019	2018
Commercial Engines	2,390	4,772	2,863	2,825
GENx Engines(a)	164	407	296	251
LEAP Engines(a)	1,568	3,637	1,736	1,118
Military Engines	801	751	717	674
Spares Rate(b)			\$ 31.0	\$ 27.5

(a) GENx and LEAP engines are subsets of Commercial Engines

(b) Commercial externally shipped spares and spares used in time & material shop visits in millions of dollars per day.

(In billions)	2019	2018	2017
Equipment	\$ 39.1	\$ 37.8	\$ 34.1
Services	234.1	185.7	166.1
Total backlog	\$ 273.2	\$ 223.5	\$ 200.2
Equipment	\$ 14.5	\$ 15.3	\$ 10.6
Services	22.3	20.2	18.5
Total orders	\$ 36.7	\$ 35.5	\$ 29.1
Commercial	\$ 24.2	\$ 22.7	\$ 19.7
Military	4.4	4.1	4.0
Systems & Other	4.3	3.7	3.3
Total segment revenues	\$ 32.9	\$ 30.6	\$ 27.0

[p.23]

(Dollars in billions)

	2019	2018	2017
U.S.	\$ 13.4	\$ 12.5	\$ 10.8
Non-U.S.			
Europe	7.5	7.0	6.3
Asia	6.6	5.8	5.2
Americas	1.6	1.5	1.1
Middle East and Africa	3.8	3.8	3.6
Total Non-U.S.	\$ 19.5	\$ 18.0	\$ 16.3
Total segment revenues	\$ 32.9	\$ 30.6	\$ 27.0
Non-U.S. revenues as a % of segment revenues	59%	59%	60%
Equipment	\$ 12.8	\$ 11.5	\$ 10.2
Services	20.1	19.1	16.8
Total segment revenues(a)	\$ 32.9	\$ 30.6	\$ 27.0
Segment profit(b)	\$ 6.8	\$ 6.5	\$ 5.4
Segment profit margin	20.7%	21.2%	19.9%

(a) Aviation segment revenues represent 38% and 34% of total industrial segment revenues and total segment revenues, respectively, for the year ended December 31, 2019.

(b) Aviation segment profit represents 65% of total industrial segment profit for the year ended December 31, 2019.

[p.122] Total sales of goods and services to agencies of the U.S. Government were 5%, 5% and 4% of GE revenues for the years ended December 31, 2019, 2018 and 2017, respectively. Within our Aviation segment, defense-related sales were 5%, 4% and 4% of GE revenues for the years ended December 31, 2019, 2018 and 2017, respectively.

10. State-Owned Enterprises (SOEs)

Question
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
Score
N/A
Comments
N/A
Evidence

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
N/A
Comments
N/A
Evidence

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
N/A
Comments
N/A
Evidence

Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
N/A
Comments
N/A
Evidence

Question
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
Score
N/A
Comments
N/A
Evidence

List of Evidence & Sources

No.	Type (Webpage or Document)	Name	Download Date	Link
01	Document	GE Code of Conduct	25/10/19	https://www.ge.com/sustainability/sites/default/files/16-0020_GE_SPIRIT_LETTER-2_r10v3_11x8.5_PRINT_ENGLISH.pdf
02	Document	Integrity Guide for Suppliers Contractors and Consultants	27/10/19	http://www.gesupplier.com/html/SuppliersIntegrityGuide/download/GE%20Integrity%20Guide%20for%20Suppliers-EN.pdf
03	Document	Jan 2019 Anti-Corruption Fact Sheet	25/10/19	https://www.ge.com/sustainability/sites/default/files/GEA33641_Anticorruption.pdf
04	Document	Governance Principles	25/10/19	https://www.ge.com/investor-relations/sites/default/files/Governance_Principles_05_21_19.pdf
05	Document	Ethical Supply Chain Program	27/10/19	https://www.ge.com/sustainability/sites/default/files/GEA33731_Ethical_Supply_Chain_Program_r1.pdf
06	Document	2019 GE Foundation Contributions Over USD 10K	08/04/2020	https://www.ge.com/sustainability/sites/default/files/GEA19005_GE%20Foundation_Contributions_greater_than_%2410K_RY2019.pdf
07	Document	2018 GE Company Contributions Over USD 10K	27/10/19	https://www.ge.com/sustainability/sites/default/files/GEA19006_GE_Company_Contributions_greater_than_\$10K.pdf
08	Document	Governance and Public Affairs Committee Charter	27/10/19	https://www.ge.com/investor-relations/sites/default/files/GPAC_Charter_May_2019.pdf
09	Document	Supplier Background Checking Guidelines	27/10/19	http://www.gesupplier.com/html/GEPolicies/download/GE%20Background%20Check%20Guidelines.pdf
10	Document	Political Contributions Policy	25/10/19	https://www.ge.com/sustainability/sites/default/files/GEA33643_Political_Contributions_Policy_r2.pdf
11	Webpage	GE Integrity Homepage	25/10/19	https://www.ge.com/sustainability/integrity
12	Document	Audit Committee Charter	27/10/19	https://www.ge.com/investor-relations/sites/default/files/AC_charter.pdf
13	Document	Public Policy Priorities 2019	27/10/19	https://www.ge.com/sustainability/sites/default/files/GEA33665_Public_Policy_Priorities.pdf
14	Document	Setting Public Policy Priorities	27/10/19	https://www.ge.com/sustainability/sites/default/files/GEA33642_Setting_Public_Policy_Priorities.pdf
15	Document	2019 Proxy Statement	28/10/19	https://www.ge.com/investor-relations/sites/default/files/GE_Proxy2019.pdf
16	Webpage	Governance	28/10/19	https://www.ge.com/investor-relations/governance

17	Document	2018 10-K Form	28/10/19	https://www.ge.com/investor-relations/sites/default/files/GE_AR18_10k.pdf
18	Webpage	FT Markets Data GE Co	28/10/19	https://markets.ft.com/data/equities/tearsheet/summary?s=GE:NYQ
19	Webpage	Open Ownership Search	28/10/19	https://register.openownership.org/search?country=US&q=general+electric+company
20	Webpage	Open Ownership Profile GE Co	28/10/19	https://register.openownership.org/entities/5aba61e99dfc3fae18ef8eac
21	Document	Environmental, Social and Governance Results 2017	28/10/19	https://www.ge.com/sustainability/sites/default/files/GE_E_SG_KPIs_RY2017_r13_Aug2018.pdf
22	Document	Government Business	28/10/19	https://www.ge.com/sustainability/sites/default/files/GEA3_3644_Governance_Government_Business_R6HR.pdf
23	Document	Developing Health Report	28/10/19	https://www.ge.com/sustainability/sites/default/files/GEA3_3683_Developing_Health.pdf
24	Webpage	Reports Hub	28/10/19	https://www.ge.com/sustainability/reports-hub#publicpolicy
25	Webpage	Lobbying Disclosure Policy	28/10/19	https://www.ge.com/sustainability/sites/default/files/GEA3_3662_Lobbying_Disclosure_Policy.pdf
26	Webpage	Q2 Lobbying Disclosure Report	28/10/19	http://disclosures.house.gov/ld/ldxmlrelease/2019/Q2/301056934.xml
27	Webpage	Q3 Lobbying Disclosure Report	28/10/19	http://disclosures.house.gov/ld/ldxmlrelease/2019/Q3/301077038.xml
28	Document	2018 Annual Report	28/10/19	https://www.ge.com/investor-relations/sites/default/files/GE_AR18.pdf
29	Webpage	General Counsel Profile	28/10/19	https://www.ge.com/about-us/leadership/profiles/mike_holston
30	Document	2018 Political Contributions	29/10/19	https://www.ge.com/sustainability/sites/default/files/GEA1_9004_Political_Contributions_YE2018_r1.pdf
31	Webpage	2018 Mid-Year Lobbying Contribution Report	29/10/19	http://disclosures.house.gov/lc/lcxmlrelease/2018/MM/700860855.xml
32	Document	2019 Half Year Political Contributions	29/10/19	https://www.ge.com/sustainability/sites/default/files/GEA1_9004_Political_Contributions_JAN-JUN_2019.pdf
33	Document	2017 Political Contributions	29/10/19	https://www.ge.com/sustainability/sites/default/files/GEA3_3705_Political_Contributions_2017_Factsheet_R4.pdf
34	Document	California Transparency in Supply Chains Act Summary	29/10/19	https://www.ge.com/sustainability/sites/default/files/GEA3_3646_California_Transparency_Factsheet_R8.pdf
35	Webpage	2018 Year-End Lobbying Contribution Report	06/11/19	http://disclosures.house.gov/lc/lcxmlrelease/2018/YY/700880246.xml

36	Webpage	2019 Mid-Year Lobbying Contribution Report	06/11/19	http://disclosures.house.gov/lc/lcxmrelease/2019/MM/700895339.xml
37	Document	Commitment to Compliance	08/04/2020	https://www.geaviation.com/sites/default/files/GE%20Aviation's%20Commitment%20to%20Compliance%202020.pdf
38	Webpage	Philanthropy	06/01/2019	https://www.ge.com/sustainability/philanthropy
39	Document	Environmental Social and Governance Results 2018	19/03/2020	https://www.ge.com/sustainability/sites/default/files/GE_E SG_KPIs_RY2018_r11_Sep2019.pdf
40	Document	2019 Annual Report	08/04/2020	https://www.ge.com/investor-relations/sites/default/files/GE_AR19_AnnualReport.pdf
41	Document	2019 Political Contributions	09/04/2020	https://www.ge.com/sustainability/sites/default/files/GEA19004_Political_Contributions_YE_2019.pdf
42	Document	GEPAC Lobbying Contribution Report, Year-End 2019	09/04/2020	https://soprweb.senate.gov/index.cfm?event=getFilingDetails&filingID=2AE924D0-2C35-4DE6-B513-75D5B7AE25BC&filingTypeID=89
43	Document	2019 GE Company Contributions Over USD 10K	09/04/2020	https://www.ge.com/sustainability/sites/default/files/GEA19005_GE%20Foundation_Contributions_greater_than_\$10K_RY2019.pdf
44	Document	Public Policy Priorities 2020	09/04/2020	https://www.ge.com/sustainability/sites/default/files/GEA33665_Public_Policy_Priorities_2020.pdf
45	Webpage	Q4 Lobbying Disclosure Report	09/04/2020	https://disclosurespreview.house.gov/ld/ldxmlrelease/2019/Q4/301126031.xml
46	Webpage	2018 10-K Form – Exhibit 21	09/04/2020	https://www.sec.gov/Archives/edgar/data/40545/000004054519000014/geform10-k2018xex21.htm