



CODE OF CONDUCT

Please read this Code of Conduct thoroughly it will support you in your day-to-day work.

NAVISTAR[®]

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Table of Contents

Table of Contents

Foreword by the Executive Leadership Team of Navistar

Our Responsibility for Compliance

Our Responsibility as a Member of Society

Human Rights

Equal Opportunity & Equal Treatment

Alcohol And Drug Use

Workplace Violence Prevention

Product Conformity & Product Safety

Environmental Protection

Donations, Sponsoring & Charity

Communication

Political Lobbying

Our Responsibility as a Business Partner

Conflicts of Interest

Gifts, Hospitality & Invitations

Prohibition of Corruption

Dealings With Public Officials & Holders of Political Office

Sales Intermediaries

Government Laws, Regulations and Investigations

Prohibition Of Money Laundering & Terrorism Financing

Accounting & Financial Reporting

Taxes & Customs

Fair & Free Competition

Procurement

Import & Export Control

Prohibition of Insider Trading

Our Responsibility In The Workplace

1	<u>Occupational Safety & Healthcare</u>	33
2-3	<u>Data Protection</u>	34
4-5	<u>Security & Protection of Information, Know-How & Intellectual Property</u>	35
6	<u>IT Security</u>	36
7	<u>Handling Company Assets</u>	37
8	Support	38
9	Help/Contacts	39
10	Self-Test for Decision Guidance	40
11		
12		
13		
14		
15		
16		
17		
18		
19-20		
21		
22		
23		
24		
25		
26		
27-28		
29		
30		
31		
32		



Foreword By The Executive Leadership Team Of Navistar

Dear Colleagues,

At Navistar, we strive for excellence in every facet of our organization. We are responsible for the development, growth and success of our brands, making a positive impact within the communities where we live and work, and making lasting relationships with customers, suppliers, partners and dealers. As we define our vision of accelerating the impact of sustainable mobility, it is all our responsibility to ensure we are remaining ethical and staying true to the principles engrained within the fabric of our company.

Our goal is to establish and maintain a culture in which integrity and honesty are at the forefront of every decision and action. We are all passionate about making a positive impact in the world around us and the future of our industry, and that starts with priding ourselves in the veracity of our products, solutions, operations, decisions and procedures.

Every employee, regardless of position or department, has the opportunity to live up to our responsibility to represent the greatness of Navistar. Because of this, we ask you to become accustomed with the Code of Conduct. The Code of Conduct assists us in fulfilling our responsibility, outlining how to act with integrity, address risks transparently and comply with rules and regulations in various work situations. Please reference this book to direct you in day-to-day operations.

The Navistar Executive Team and Board of Directors eagerly joins all employees in accelerating the impact of sustainable mobility using this Code of Conduct as a guide toward our future.



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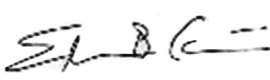



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Our Responsibility for Compliance

One decisive factor for the success of our Company is that all employees – from Board members and managers to each individual member of staff – must act with honesty and integrity and in an ethical manner. This also means that our internal and external reporting and communications must be truthful, comprehensive, and timely.

Our shared goal is to fulfill our responsibility to our Company and to protect the reputation of our brand. Sustainability requires us to be aware of our responsibility for the economic, social and ecological impact of our actions. It also means that we respect and observe the rules in force in the Company everywhere and at all times. Our Board members and managers bear a special responsibility in this context: they are role models and must strive to prevent noncompliant behavior within the Company, protect their employees and conduct themselves with integrity both within the Company and externally.

This Code of Conduct helps us by highlighting potential areas of risk and conflict, explaining their significance for our Company and illustrating them using case studies.

The information contained in this Code of Conduct is divided into three main sections:

OUR
RESPONSIBILITY AS A
MEMBER OF SOCIETY

OUR
RESPONSIBILITY AS A
BUSINESS PARTNER

OUR
RESPONSIBILITY IN THE
WORKPLACE

[+ Continue To Next Page](#)

Our Responsibility for Compliance

The Code of Conduct serves as a binding guideline in our day-to-day business. It is supplemented by internal guidelines and regulations. It also goes without saying that we all comply with applicable international, federal, state and local laws and regulations. This also means that we never participate in or knowingly associate with any activity that involves fraud, misappropriation, extortion, theft, embezzlement, or any other deliberate damage to the assets of our customers or any third party.

Failure to observe the Code of Conduct can result in considerable damage, not only to our Company, but also to us as employees and to our business partners and other stakeholders. That is why the Code of Conduct is binding on all of us, irrespective of whether our role is that of a staff member, manager, or Board member. We do not tolerate violations of the Code of Conduct. Anyone who violates the Code of Conduct must expect consequences, which, depending on the seriousness of the violation, may warrant disciplinary action, up to and including termination, in addition to claims under civil and criminal law.

To make sure that does not happen, it is up to each and every one of us to review and understand this Code of Conduct, to integrate the Code of Conduct into our own behavior, and to bear the Code of Conduct in mind when making decisions. When in doubt, we seek competent advice and can trustfully contact our compliance and legal contacts as well as the central Compliance Helpdesk (contact information available in the Support chapter on page [39](#).)

Our Responsibility As A Member of Society

Our social responsibility means that observing and complying with the law is a requirement, not an option. We must follow applicable law in business decisions we make.

Every employee of Navistar must be aware of the Company's social responsibility, particularly regarding the wellbeing of people and the environment and make sure that our Company contributes to sustainable development.



Human Rights

The Declaration of Human Rights adopted by the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms states what is required and expected of the international community when it comes to observing and respecting human rights. These tenets are further supported by applicable US federal, state and local laws pertaining to human rights and freedoms.

+ Corporate Principle

We respect and follow regulations in force to protect human rights and children's rights (hereinafter called human rights) as a fundamental and general requirement throughout the world. We reject all use of child labor and forced or compulsory labor as well as all forms of modern slavery and human trafficking. This applies to the conduct of our Company and business partners.


+ My Contribution


As an employee, I can also make my contribution to respecting human rights. I regard human rights as a fundamental guideline, and I am vigilant against human rights abuse happening around me.

If I have concerns regarding potential human rights abuse in my professional surroundings, I will immediately report the behavior to my manager and any of the contacts listed on page [39](#).



+ Example

 You are responsible for purchasing specific goods. You receive information alleging that a supplier with which you do business uses children in its production process, or that employees are made to work in inhumane conditions (e.g., exposed to health risks).

 **Take the necessary steps and inform your manager and the units responsible for sustainability in supplier relations. Our Company must evaluate the information, examine business relations with this business partner more closely and, if necessary, terminate the relationship.**

+ Reference

Refer to the [BHR Statement](#) and the Policy [Safety, Health and Human Trafficking](#), for additional information. For guidelines for reporting safety-related issues, refer to the conclusion of the Code of Conduct or Policy [Report and Investigate Concerns](#).

Equal Opportunity & Equal Treatment

We condemn all forms of injustice and violence and hold ourselves and each other accountable for building an equitable and inclusive workplace in which diverse teams thrive. Equal opportunities and equal treatment under the law are key cornerstones of a fair, unprejudiced, and open approach. Navistar encourages respectful cooperation in a spirit of partnership, diversity and tolerance. That is how we achieve a maximum degree of productivity, competitive and innovative capability, creativity and efficiency.

+ Corporate Principle


We offer equal opportunities for everyone.


Navistar strictly prohibits any conduct that constitutes unlawful discrimination as defined by the courts based on race, color, gender, gender identity, national origin, ancestry, religion, physical or mental disability, medical condition, pregnancy, childbirth or related medical condition, marital status, sexual orientation, age, military status, protected Veteran status, Vietnam Era Veterans status or any other characteristic protected under federal, state or local law. All conduct deemed to be discriminatory by Navistar is prohibited under this policy even if it does not rise to the level of being legally actionable. Navistar's Equal Employment Opportunity policy applies to all People & Culture practices. It is Navistar's policy to base all employment-related decisions on principles of equal employment opportunity.

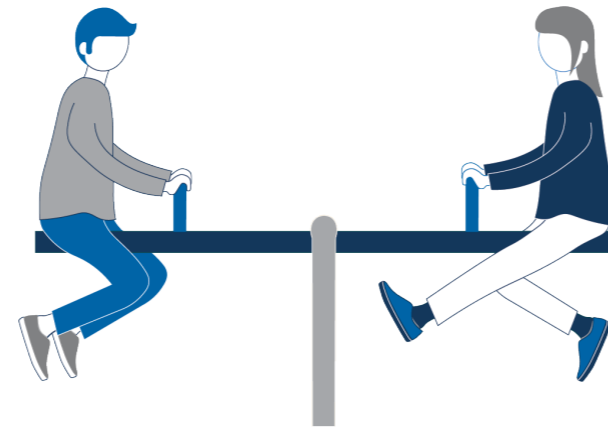
+ My Contribution

I observe the principles of equal opportunity and equal treatment under the law and encourage people around me to do the same. If I believe I have been subjected to or witnessed conduct that violates principles of equal opportunity or equal treatment, I will immediately report the behavior to my manager, the People & Culture Department, or any of the contacts listed on page [39](#).

+ Example

 A colleague comes to you with allegations of disparate treatment, allegedly based on the colleague's membership in a protected class, such as age, race, or national origin.

 **You report the matter to your manager or to the People & Culture Department so that appropriate steps can be taken. You may also call the Ethics Hotline or reach out to any of the contacts listed on page [39](#).**



Alcohol & Drug Use

Navistar is committed to providing its employees a safe place to work and its customers with quality products. Maintaining a drug-free and alcohol-free work environment improves workplace safety, productivity, and quality.

+ Corporate Principle


In support of maintaining a drug-free and alcohol-free work environment, subject to applicable law and local collective bargaining agreements, we reserve the right to conduct pre-employment, post-accident, and for-cause drug testing.

+ My Contribution

I observe the principles of a drug-free and alcohol-free work environment and encourage people around me to do the same.

+ Example

 You notice that your coworker is stumbling and has alcohol breath during your shift.

 **You report the matter to your manager or Corporate Security so that appropriate steps can be taken. In any case you can also contact the People & Culture Department or call the Ethics Hotline.**

+ Reference

Refer to the Policy [Alcohol and Drug Use](#) for more detailed information.

Workplace Violence Prevention

Navistar places a high priority on the safety of its employees, contractors and visitors. We do not tolerate any threats, acts of violence or other forms of intimidation in the workplace, committed by or against our employees.


+ Corporate Principle


No firearms or weapons of any type shall be permitted on or in company property, or while using company property, such as company vehicles, or while conducting business as a representative of the Company.

+ My Contribution

To maintain a secure working environment, I have the obligation to remain alert and immediately report any actual or suspected violent acts in the workplace.

+ Example

 You notice that two of your coworkers are having an argument and one ends up forcefully shoving the other one into the assembly line.

 **Immediately report the incident to your manager, local Loss Prevention, People and Culture Department or Global Security. Reports can also be made through any of the contacts listed on page 39.**

+ Reference

Refer to Policy [Workplace Violence Prevention](#), and Policy [Weapons and Firearms](#), for additional information, or contact the Global Security Department for consultation. Guidelines for reporting incidents of workplace violence can be found in the conclusion of the Code of Conduct or Policy [Report and Investigate Concerns](#).

Product Conformity & Product Safety

People around the world use or come into contact with Navistar's products and services daily. As such, Navistar is committed to providing safe, environmentally friendly, high-quality products and services that meet or exceed our customers' expectations.


+ Corporate Principle


For that reason, it is our mission to comply with applicable laws and regulations that apply to our products. This is monitored continually and systematically through processes and structures as well as through product surveillance under real field conditions.

+ My Contribution

If I notice or have concerns that our products could present a threat or that regulations are not being followed, I report the matter to my manager and to the relevant contacts in the Company.

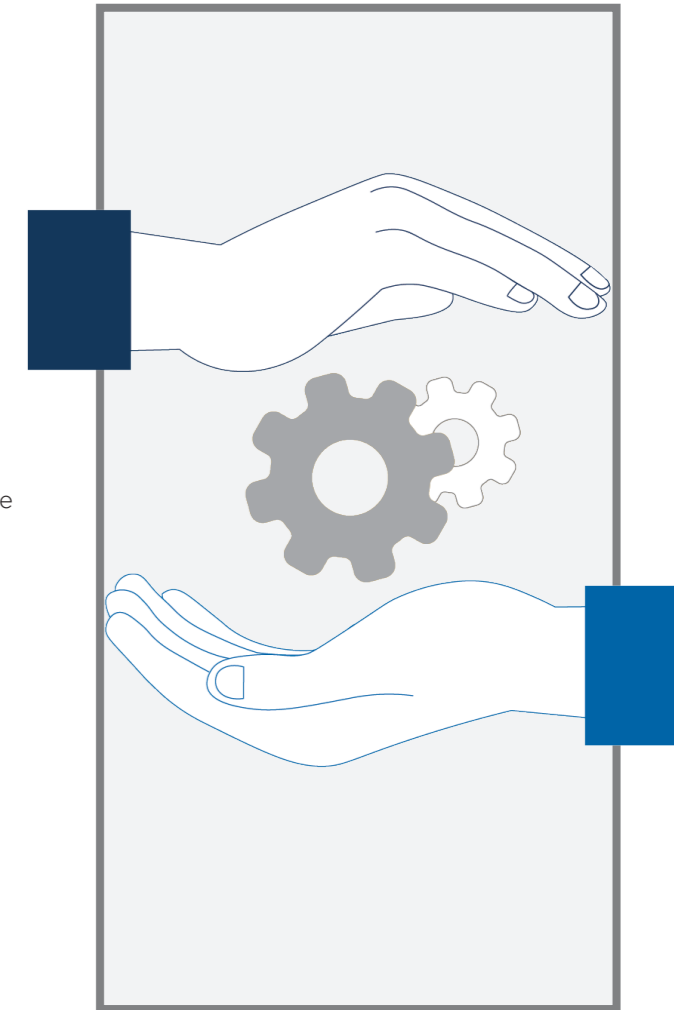
+ Example

 Your Group Leader has expressed the need to complete 54 units before end of shift. You are responsible for inspecting the unit before additional assembly processes are conducted. Towards the end of shift you notice a flow of a consistent defect on units in your workstation. This defect is not on your normal checklist to inspect, but you are sure that it does not meet the standard.

 **Inform your Group Leader of the defective part immediately and explain that additional units may have escaped the station undetected so that the correct level of containment can be initiated.**

+ Reference

Refer to the [Quality Policy](#) for additional information.



Environmental Protection

Navistar is a global provider of commercial vehicles as well as associated services. Being in this position, Navistar is aware of its special responsibility toward the environment.

+ Corporate Principle

As a commercial enterprise, we bear responsibility for the environmental compatibility and sustainability of our products, locations and services. Our operations are subject to a number of laws, including those governing hazardous waste, air pollution and water pollution. We comply with applicable local, state, and federal environmental protection laws and regulations in all countries in which we operate our business. It is everyone's responsibility to be familiar with the requirements that apply to their area and take personal responsibility for compliance. We also strive to conduct operations that use a lifecycle approach, considering all impacts upstream and downstream from a particular activity. Our aim is to conduct our operations in a manner that considers and minimizes those impacts on the environment and natural resources.

Our products are also regulated for emissions and other environmental requirements. The same as our operations, we comply with all applicable environmental laws and regulations. We also work to reduce the environmental impact of our products and operations. Starting with the early phases of development and production, our policy is to understand our impact, manage natural resources carefully and steadily reduce the environmental impact. We aim to develop advanced and efficient technologies, considering the entire lifecycle of our products. Furthermore, we endeavor to constantly reassess the environmental compatibility of products and manufacturing processes, optimizing these where necessary. To track our progress in this area, we have implemented programs to assess, monitor and report progress on our environmental and energy goals. Many of our operations are covered by an environmental management system (EMS) certified under ISO14001 and we follow those EMS procedures if they apply to our activities.



In accordance with our government relations standards, we seek a dialogue with state and local governments on future mobility and energy concepts and on shaping ecologically sustainable development.



+ My Contribution

I keep environmental protection in mind when I work by using resources and energy economically and efficiently. I seek to have my activities make the smallest possible impact on the environment and that they comply with applicable environmental protection laws and regulations.

+ Examples

-  You notice that a coworker of yours wrongfully disposed a partially used aerosol can in the regular trash.
-  **Remind your coworker to puncture and drain the can of any fluid, with then the fluids being properly managed and the can recycled in its appropriate bin.**

+ References

Refer to the Policy [Environmental Protection and Energy Conservation](#) for additional information.

Donations, Sponsoring, & Charity

Navistar makes donations (contributions on a voluntary basis with no expectation of consideration in return) and sometimes participates in monetary sponsorships (contributions based on a contractually agreed consideration) as part of our commitment to be a good corporate citizen and to achieve a positive impact on society. To help ensure that all Navistar contributions are aligned with business and social responsibility goals and are within budget and resource limitations, all donations and sponsorship activities must be approved according to the Company's policy on Charitable Contributions.



+ Corporate Principles

The granting of donations and sponsoring measures is permitted only in accordance with a transparent approval process. To verify that our contributions are aligned with our social-responsibility objectives and are compliant with all applicable laws, the Social Impact Manager must approve the organization to which contributions will be made, as well as all subsequent contributions.

+ My Contribution

The granting of donations on behalf of the Company must be transparent: the purpose, the recipient of the donation, and the donation receipt issued by the recipient must be documented and verifiable. I comply with internal processes and do not initiate any donation on behalf of the Company that could damage the reputation of our Company.

+ Examples

-  During a business lunch a potential customer asks you if Navistar could sponsor a local baseball team. The potential customer's daughter is part of the team and it gets mentioned that they urgently need new equipment.
-  **Tell the potential customer that you have to check internally first before making any commitment as sponsoring measures may be granted only after going through the required approval process.**

+ References

Refer to Policy [Charitable Contributions](#) or contact the Social Impact Manager for additional information.



Communication

Navistar believes it is important to communicate clearly and openly with employees, business partners, the media and other stakeholders using honest and lawful means. Our employees bear a responsibility to observe internal communication rules to ensure that we present a unified and consistent image of the Company.


+ Corporate Principle


We make sure communications made on behalf of Navistar are clear and consistent in order to maintain the confidence of customers, investors and other stakeholders. Every relevant communication on behalf of Navistar and its brands must be approved through the Navistar Communications Clearing Office. These same principles apply to social media. If we choose to participate in social media, we are making a commitment to follow internal procedures. We do not post confidential or proprietary Navistar information.

+ My Contribution

I do not issue any public statement for my company and always refer any requests to the Communications Clearing Office. I consult the Company's social media guidelines for advice on proper conduct on social networks.

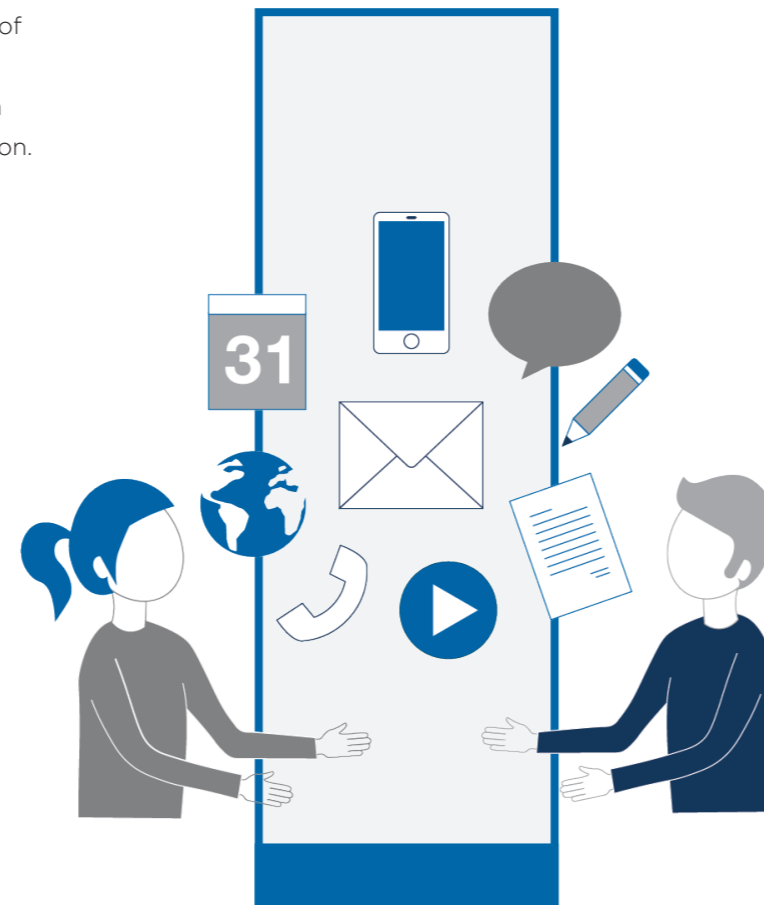
+ Examples

 You read a comment on the Internet from someone who is critical of Navistar's production methods, but the points raised are entirely unfounded.

 **Even if you would like to correct the misrepresentation straightaway, consult with the Communications Clearing Office first, because this department is able to respond appropriately and comprehensively to such criticism.**

+ References

To reach Communications Clearing office, contact Refer to [One Voice Policy](#), [Media Relations Policy](#), and [Social Media Policy](#) for additional information.



Political Lobbying

Politics and legislation exert an influence on the economic framework for business processes. Navistar's participation in commercial trade means that it also has an impact on society and can specifically promote its interests during decision-making processes, such as those for legislation plans, through political lobbying.


+ Corporate Principle


We conduct political lobbying centrally and in line with the principles of openness, accountability and responsibility. It goes without saying that our interaction with political parties and interest groups is based on the principle of neutrality. Dishonestly influencing policymakers and governments is not permitted.

+ My Contribution

I do not attempt to intervene in political decisions on behalf of the Company if I am not authorized to do so. I contact the Law and Government Relations Departments to determine whether a potential contact with government personnel constitutes lobbying. If it doesn't, I observe the relevant internal guidelines in the performance of my duties.

+ Examples

 An acquaintance of yours is a member of Congress. You know that a legislation proposal that is important for Navistar is currently being discussed in Congress and you contemplate contacting your acquaintance to explain Navistar's interests in connection with this proposal.

 **Do not approach your acquaintance about the issue. Political lobbying at Navistar is exclusively coordinated centrally and conducted openly and transparently. The appropriate point of contact for such lobbying measures is the Government Relations Department.**

+ References

Refer to Policy [Political Activities](#) and [Lobbying](#) for additional information.



Our Responsibility As A Business Partner

Integrity, transparency and fairness are key to creating credibility and trust in business practice. That is why Navistar sets a particularly high standard by systematically implementing its legal framework, intragroup guidelines and corporate values into its business; and by communicating them clearly.

This also includes distributing our products and services exclusively through our independent authorized dealers.

Navistar's responsibility as a business partner specifically gives rise to the following principles:



Conflicts Of Interest

There is a potential conflict of interest if the private interests of a Navistar employee clash or could clash with the interests of Navistar. Conflicts of interest arise when a Navistar employee has competing or conflicting loyalties, such as when personal interests conflict with such individual's or person's duties to Navistar. Personal interest could be a financial interest in another company or in a transaction, an outside or secondary job, a family or personal relationship with someone, or any interest or relationship that could affect judgment or decision-making in performing responsibilities for the Company. If employees place their personal interests above those of the Company, it could damage Navistar.


+ Corporate Principle


We respect the personal interests and the private lives of our colleagues. However, it is important to avoid conflicts between private and business interests, or even the appearance of such a conflict. Our business decisions are made exclusively on the basis of objective criteria and we do not allow ourselves to be swayed by personal interests or relations. In case of a conflict, we jointly seek a solution that is not detrimental to the Company's interests.

+ My Contribution

I avoid even the appearance of any conflict of interest and must complete the electronic Conflict of Interest Certification to fully disclose any actual or potential influence, interest or relationship that could conflict with, or have the appearance of conflicting with, the best of interests of Navistar, on an annual basis. If there are any new conflicts, or changes to an existing conflict, I must disclose it to my manager and the compliance team by completing a Conflict of Interest Form. If I am unsure whether a particular situation creates a conflict, I will seek guidance from the Compliance and/or Law Department.

+ Example

 Your boss asks you to review bids from several suppliers of plastic components. You discover that one of the most favorable bids is from the company of a good friend.

 **Inform your manager of the situation and disclose the potential conflict of interest by completing the Conflict of Interest Form. Agree on the approach with your manager and the Compliance Department.**

+ Reference

Refer to Policy Conflicts of Interest, Policy Gifts and Entertainment, and Policy Employment of Closely Related Persons for additional information.

Gifts, Hospitality & Invitations

Benefits in the form of gifts, hospitality, invitations and other entertainment are prevalent in business relationships. These benefits are generally not prohibited as long as they are of nominal value, do not influence or appear to influence the recipient's decision-making, and do not conflict with any internal or statutory rules. However, if such benefits exceed what is considered nominal value and are misused to influence third parties, those involved may be subject to discipline (up to and including, termination, and/or prosecution).


+ Corporate Principle


Our company policy on Handling Gifts, Hospitality and Invitations to Events regulates which benefits are appropriate. We must not accept or grant gifts or entertainment that could influence or appear to influence our business judgment, and we must avoid accepting or granting excessive or inappropriate gifts and entertainment that may reflect negatively upon Navistar.

+ My Contribution

I familiarize myself with the company policy on Handling Gifts, Hospitality and Invitations to Events and strictly abide by it. I check my conduct in this regard to ensure that I do not accept or grant gifts or entertainment that could influence or appear to influence my business judgment, and that may reflect negatively upon Navistar.

+ Example

 An employee from a supplier gives you a valuable birthday gift that you are possibly not permitted to accept under the internal policies.

 **Even if you are of the opinion that accepting this gift does not affect the business relationship, you are not permitted to disregard the applicable company policy on Handling Gifts, Hospitality and Invitations to Events. When in doubt, do not accept the gift. If you are concerned that rejecting the gift could be misconstrued, contact your manager and the Compliance Department and agree on a solution. In case of questions, please approach the compliance contacts listed on page 39.**

+ Reference

Refer to Policy [Gifts and Entertainment](#) or consult with the Corporate Compliance Department for additional information. Refer to policy [Anti-Corruption and Anti-Bribery](#) for detailed information regarding giving gifts or entertainment to government officials.



Prohibition of Corruption

Corruption is a serious problem in commercial trade. It generates decisions based on improper grounds and prevents progress and innovation, as well as distorting competition and damaging society. Corruption is prohibited. Navistar is committed to conducting its business ethically and in compliance with all applicable laws and regulations that prohibit improper payments to obtain a business advantage. Violations may result in penalties including monetary fines, debarment and suspension for Navistar. Each individual employee involved is subject to severe penalties, including monetary fines and imprisonment. By law, fines imposed on individuals for violations cannot be paid by Navistar and must be paid by the individual committing the violation. In addition to penalties that may be imposed by the laws of the countries where we operate, Navistar will discipline employee violations, up to and including termination.

+ Corporate Principle

The quality of products and services from our Company is the key to our success. We do not tolerate corruption, bribery or other improper payments in any of our business operations. We conduct business lawfully with our business partners, customers or other external third parties only within the permissible legal framework and in line with existing internal rules. We must never offer, promise to make or make payment or provide anything else of value directly or indirectly to influence the placement of contracts, obtain a business advantage, secure political or business concessions. We comply with all applicable anti-bribery laws including, but not limited to, the United States Foreign Corrupt Practices Act, (FCPA), the U.K. Bribery Act (UKBA), China's Anti-Corruption Law, Brazil's Clean Company Act, Mexico's Federal Law Against Corruption in Public Procurement, as well as laws in other countries influenced by the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

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Prohibition of Corruption

+ My Contribution

I never bribe others and I never accept a bribe, either directly or indirectly. I review appropriate policies, report instances or activities that may violate any policies; execute periodic certifications of policy compliance, and complete anti-corruption training as required.


If I become aware of conduct contrary to the anti-corruption policy, I must report it to my manager or the Compliance or Law Departments.


+ Reference

Refer to the Policy [Anti-Corruption and Anti-Bribery](#) for additional information or consult with the Compliance or Law Department.



+ Example

 You are part of the sales department and would like to exceed this year's revenue target. You prepare a bid for a major contract where a potential customer has issued a request for a quotation. The relevant decision maker on the customer side offers to influence the award of the contract in favor of your company in return for consideration from you.

 **The request of the customer constitutes corrupt behavior. Inform your manager and your responsible Compliance Department immediately (see the contacts listed on page 39.)**

Dealings With Public Officials & Holders Of Political Office

Dealings with public officials or holders of political office, governments, authorities and other public institutions often involve special statutory rules, any individual breach of which may have serious consequences and could permanently harm Navistar's business and reputation.



+ Corporate Principle

Our contacts with public officials and holders of political office are strictly in line with all laws and regulations (including, but not limited to, the United States Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), China's Anti-Corruption Law, Brazil's Clean Company Act, Mexico's Federal Law Against Corruption in Public Procurement, and laws in other countries influenced by the Organization for Economic Co-operation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions), as well as the relevant internal rules concerning the avoidance of conflicts of interest and corruption.

We do not make any "facilitation payments." Such payments are sums paid to public officials to accelerate routine administration matters. We are prohibited from offering, promising to make or making payment, or providing anything of value directly or indirectly to any other party, including, but not limited to, any government official and/or government entity for the purpose of influencing the placement of contracts, the retention of business, obtaining a business advantage, or securing political or business concessions; nor may a Navistar employee provide anything of value directly or indirectly to any other party in connection with Navistar business for any other purpose where such transaction would violate applicable anti-bribery and anti-corruption laws.


+ My Contribution


I am aware that particularly strict rules apply when dealing with government officials and public contract awarders and I familiarize myself with these rules. In case of questions, I contact the Compliance and/or Law Department. For contact details please refer to page 39.

+ Reference

Refer to the Policy [Anti-Corruption and Anti-Bribery](#) for additional information or consult with the Law Department.

+ Example

 You know that a governmental authority is planning a call for a request for quotation for a major contract. You consider asking the government employee responsible for requesting the quotation, who you know from a previous project, to design the request in such a way that Navistar wins the contract.

 **Do not, under any circumstances, take any such action. Exerting this kind of influence would be illegal and a violation of company policy.**

Sales Intermediaries/Agents

When initiating and/or conducting its sales-based business dealings, Navistar engages external consultants in some areas of the business who act in a sales support capacity in the interests, or by order, of Navistar in various ways. However, there is no guarantee that these consultants will follow the same high ethical principles of conduct that Navistar itself does because they are not part of the Company. To minimize the risk of the remuneration paid by Navistar being used as corruption funds insofar as possible, care must be taken when using consultants or any other third parties. Legal violations by these types of consultants can also damage Navistar's reputation and even lead to the Company being liable to third parties, as well as to potentially very high penalties.


+ Corporate Principle


Navistar is committed to doing business the right way. We only use consultants in line with general statutory rules and our company policies. Prior to engaging any third parties, they are subject to an integrity due diligence review to evaluate potential ethical and regulatory risk associated with the business relationship. In addition, consulting firms and agencies are only paid for services that are actually rendered and that the payments are commensurate with the performance rendered.

+ My Contribution

I check the integrity of potential consultants and agents carefully before issuing instructions and executing payments in compliance with company policies. I verify that the contracts for which I am responsible stand up to legal and business scrutiny and in case of questions, I contact the Compliance and/or Law Department. For contact details please refer to page [39](#).

+ Example

 Your company takes part in a public solicitation for bids. A sales-related consultant approaches you and informs you that he can make sure that the contract will be awarded to your company in exchange for an additional agency fee.

 **If you approve the additional agency fee and the consultant uses this fee as a bribe to make sure that your company is awarded the contract, depending on the seriousness of the violation, it may warrant disciplinary actions, up to and including termination, in addition to claims under civil and criminal law. In order to rule out this risk, you must check the integrity of the sales related consultant using the rules laid down in the internal rules.**

+ Reference

Refer to the [Corporate Policy on Global Sales](#), the Policy [Global Third Party Due Diligence](#), and to Policy [Anti-Corruption and Anti-Bribery](#). For additional information or consult with the Law Department.

Government Laws, Regulations & Investigations

To avoid potential penalties and preserve Navistar's reputation, it is important that business is conducted in compliance with all applicable laws and regulations in the countries where Navistar operates.

+ Corporate Principle

We establish and maintain programs in order to stay fully compliant with government laws, rules and regulations. In the rare event that Navistar's standards conflict with local laws and regulations, employees must consult with Navistar's Law Department for guidance.

Representatives from government agencies sometimes contact Navistar to obtain information related to a government investigation or inquiry. In such situations, we seek to cooperate with the government representatives while still preserving our company and employee rights to privacy and confidentiality.

+ My Contribution


I conduct all business in compliance with all applicable laws and regulations, and will report anything that is noncompliant. If contacted by a representative from a government agency, public official, our court official, I will contact the Law Department to obtain its approval and guidance before revealing any information or permitting examination of any person, record, or premises.


I abide by all applicable provisions for recording and posting transactions and contracts in the accounting system within my area of responsibility.

+ Reference

Refer to Policy [Government Laws and Regulations](#) for additional information. Refer to Policy [Government Investigations](#) for additional information.

+ Example

 You receive a request from the Environmental Protection Agency (EPA) to disclose information for the past 5 years of emission testing on our trucks.

 **Prior to providing any documents to government agencies, I forward the request to the Law Department who will deal with such inquiries directly.**

Prohibition of Money Laundering & Terrorism Financing

Laws against money laundering and terrorism financing are in place in almost all countries worldwide. Money laundering occurs when funds or other assets originating directly or indirectly from criminal offenses are put into circulation in the legal economy, making their source appear legal. Terrorism financing occurs when money or other resources is/are made available to commit criminal acts of terrorism or to support terrorist organizations. Liability for money laundering does not require the person involved to be aware that money is being laundered through the legal transaction concerned or the transfer concerned. Inadvertent involvement in money laundering may be sufficient grounds for serious penalties for everyone involved.

+ Corporate Principle

We carefully complete due diligence process of customers, business partners and other third parties with whom we wish to do business. We check for red flags that may indicate the occurrence of money laundering, perform appropriate follow-up when a red flag is identified and notify the Trade Compliance or Compliance Department when further investigation points to suspicious activity. It is our declared aim to conduct business solely with reputable partners who operate in line with applicable laws and regulations and who use resources from legitimate sources.

+ My Contribution

I take no action whatsoever that may violate money laundering provisions at home or abroad. I am vigilant and report any suspicious conduct on the part of customers, business partners and other third parties to the Compliance Department or one of the contacts listed on page [39](#).

I abide by all applicable provisions for recording and posting transactions and contracts in the accounting system within my area of responsibility.

+ Reference

Refer to Policy [Money Laundering Prevention](#) for additional information.

+ Example

One of Navistar's customers has overpaid and asks for the excess amount to be repaid by transferring it to an account held in Switzerland or by paying it in cash, instead of repaying the excess amount via bank transfer to the original business account.

Do not accept the suggestion readily. This kind of request requires an explanation. Ask the customer why the amount cannot be repaid in the same way it was originally paid. Seek advice from any of the compliance contacts listed on page [39](#).

Accounting & Financial Reporting

Navistar can build and retain the trust of the general public and contract partners only through proper accounting and correct financial reporting. Any irregularities may have serious consequences for the Company as well as for those responsible. Navistar and its employees must maintain independence with regard to its relationship with its independent auditors. In addition, employees are expected to provide financial records and other information as required by the Navistar's independent auditors to facilitate their audit of the financial statements and evaluation of internal controls over financial reporting.

+ Corporate Principle

We strictly comply with the statutory provisions for proper accounting and financial reporting. Transparency and correctness are our top priorities. To that end, TRATON regularly informs all capital market players of the Group's financial position and business developments, including Navistar information.

+ My Contribution

In my area of responsibility, I organize processes so that all business financial data can be entered into the accounting system correctly and promptly. If I have any questions about the correct recording of data, I contact my manager or the appropriate Finance Department.

+ Example

You urgently need new equipment. However, the budget in your department for the current fiscal year has already been used up. You consider acquiring the equipment nevertheless and posting the cost in the next fiscal year when your budget is replenished.

Refrain from taking such action. Entries must always be posted accurately. Posting entries inaccurately may have serious consequences for the Company or individual employee.

+ Reference

Refer to Policy [Financial Responsibility](#), and Policy [Relationship with Independent Auditors](#) for additional information.



Tax & Customs

Our global operations and the development of new markets mean that we must comply with numerous different regulations relating to external trade, tax and customs law. Observing tax and customs regulations builds trust with customers, financial authorities, and the general public. Any irregularities can cause significant financial damage to Navistar, including a negative impact to the Company's reputation and having negative consequences for the employees involved.

+ Corporate Principle

We are aware of our social responsibility to meet our obligations with regards to taxes and customs, and we explicitly endorse compliance with national and international rules, regulations, and laws.

+ My Contribution

In my area of responsibility, I design internal structures and processes in such a manner that the taxes and customs to be paid by the respective companies are calculated correctly, promptly and in full; are disclosed in reporting; and are paid to the appropriate fiscal authorities.


If I have information concerning the infringement of tax or customs regulations in my area of responsibility, I undertake every action I can to prevent or stop this infringement. If that is not possible, I communicate with my manager or the appropriate contact person in the Tax, Trade Compliance or Law Department.


+ References

Refer to all Standard IFRS policies in the [PolicyTech](#) folder Accounting and Finance – IFRS Policies.



+ Examples

 You are responsible for entering certain business transactions, such as general overhead (maintenance expenses) and production costs, in the statutory financial statements. One project exceeds certain controlling parameters early in the financial year. You therefore receive instructions to make an entry under maintenance expenses even though the transaction unquestionably relates to an investment and must therefore be treated as capitalized production costs.

 **Post the entry in line with legal requirements. All business transactions must be correctly reported pursuant to commercial law and tax regulations because these accounting records form the basis for tax returns. Accounting errors could therefore result in incorrect tax returns and lead to serious consequences under tax and customs law for the company and the employees responsible.**

Fair & Free Competition

Navistar is committed to acting fairly and honestly with its competitors and dealers and complying with applicable trade regulations. The antitrust laws of the United States and the competition laws of other countries are a critical part of the business environment in which Navistar operates. In addition, Navistar must comply with other applicable trade regulations. We expect all employees to engage in fair, ethical and legal business conduct at all times. Therefore, it is crucial for employees conducting Navistar business to know, understand and comply fully with our Code of Conduct and with those laws and regulations that govern our interaction with our competitors and dealers, as well as other trade regulations.

Navistar dealers are independent businesses and, as such, are entitled to make their own decisions as to the way they conduct their activities. Any attempt to deprive them of freedom to determine prices, terms, and conditions of sale, or to place undue limitations on their freedom to operate independently, involves a risk of violation of the antitrust and competition laws. Those employees with decision-making responsibility regarding interactions between Navistar and our dealers should be in regular contact with the Law Department.

+ Corporate Principle

We conduct business based on merit and market economy principles, as well as free and unhindered competition. We like to measure ourselves against our competitors, always abiding by rules and regulations and observing ethical principles. We engage in fair, ethical and legal business conduct at all times.

We do not enter into any anti-competitive agreements with competitors, suppliers or customers. If Navistar holds a dominant market position, we do not abuse this position. Our decisions whether to sell to any customer must be determined independently, including but not limited to, based on costs, market conditions and competitive prices. We comply with the specific antitrust provisions for distribution systems in our dealings with our authorized distribution partners.


+ Continued To Next Page


Fair & Free Competition

+ My Contribution

I engage in independent decision-making, based on costs, market conditions and competitive prices. Because contacts with competitors—whether formal or informal, business or social—can be misconstrued, it makes good sense to be sensitive to the implications of such contacts. Thus, to be safe, I should avoid contact with competitors that could create an actual or perceived conflict with our Code of Conduct, unless approved in advance by the Law Department.

+ Example

 You talk to a competitor's employee at a trade fair. After a while, you notice you are being questioned for information about your company's future business planning. In return, the employee offers to divulge the same information about the competitor.

 **Immediately make it absolutely clear to the competitor's employee that you will not talk to him about such issues. This type of conversation – apart from the unauthorized disclosure of business secrets – is also a breach of prevailing competition and antitrust legislation and could have drastic consequences for you personally, Navistar, and both the competitor's employee and company. Inform your Compliance or Law Department immediately. See page 39 for contact details.**

+ Reference

Refer to Policy [Insider Trading](#) and to Policy [Conflicts of Interest](#) for additional information.

Procurement

Navistar is contractually bound to many suppliers and service providers in its business operations. Navistar is committed to using fair and ethical standards when conducting business with its suppliers. Navistar is also committed to building a diverse supplier base and to upholding applicable laws that pertain to contracting with diverse suppliers.


+ Corporate Principles

We carefully select suppliers and service providers based on objective criteria. We expect "best-in-class" performance and continuous improvement from our suppliers, and we believe we can best achieve those goals through fair and ethical treatment of our suppliers and by encouraging a diverse supplier base. When purchasing products and services, we involve the appropriate purchasing departments as set forth in the applicable procurement guidelines.

+ My Contribution

I am responsible for acting in a fair and ethical manner when dealing with suppliers. I show no bias in favor of a supplier or service provider without an objective reason, and I avoid any conflict of interest. I do not purchase any products or services without first having looked at the market and alternative suppliers. I follow the relevant procurement principles and involve the appropriate purchasing department at an early stage in the purchasing process.

+ Examples

 You become aware of an employee that is going to hire a service provider without following the procedure of obtaining three bids or completing the sole source form.

 **It is important that purchasing processes documented in our internal guidelines are followed. If you notice a violation of those processes, notify the responsible purchasing department or one of the contacts listed on page 39.**

+ References

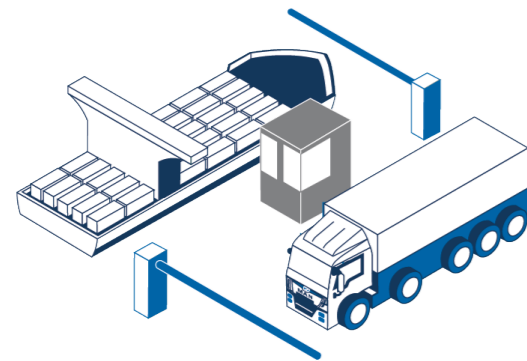
Refer to Policy [Supplier Relations](#) for additional information.



Import & Export Control

Import and export control can impose prohibitions, restrictions, approvals from authorities or other monitoring measures on the cross-border exchange of goods. These provisions under import and export control legislation apply to technologies and software as well as goods. Apart from imports or exports per se, those controls may also apply to the temporary cross-border transfer of, for instance, objects and technical drawings taken on a business trip, or technical transmissions by e-mail or cloud.

Furthermore, any business with persons or companies named in any sanctions lists, including but not limited to sanctions lists published by the Office of Foreign Assets Control (OFAC), U.S. Department of Commerce or the U.S. Department of State, is strictly prohibited, regardless of the delivery process. Failure to comply with applicable laws and regulations may result in penalties, criminal charges, and other actions that could impact Navistar's ability to do business.




+ Corporate Principles


We comply with applicable laws for importing and exporting goods, technology, software, services, and financial transactions and avoid acts that might be considered illegal, unethical, or dishonest. We must not engage in foreign boycotts that the U.S. does not sanction and must promptly report any request to engage in such activity to the Law Department.

+ My Contribution

When making a decision concerning the import or export of products and services, I consciously examine whether the decision may fall under import or export control. When in doubt, I seek advice from the Trade Compliance or Law Department. I ensure that all parties to import and export transactions are loaded into Navistar's screening tools and I report suspected boycott requests to the Law Department.

+ Examples

 You receive an inquiry from a potential customer wishing to place an order with your company to supply products in a country possibly listed as an embargoed country.

 **Clarify the matter by asking the Foreign Trade Compliance Department about export restrictions that apply to the country to be supplied (e.g., a UN embargo) and do not conclude any contracts that bind your company to export to this country until the issue has been fully clarified.**

+ References

Refer to Policy [International Trade](#) for additional information.

Prohibition of Insider Trading

Legislation prohibits the use or disclosure of inside information in the trading of shares, other securities or financial instruments. The same applies to recommendations to third parties or inciting a third party to engage in insider trading or to the unlawful disclosure of inside information. Pertinent national legislation may stipulate further prohibitions. Inside information is information of a precise nature that has not been made public and that, if it were made public, would be likely to have a significant effect on the price of the relevant security (e.g., TRATON or Volkswagen shares) or financial instrument.


+ Corporate Principles


We handle information pertaining to share performance in accordance with capital market requirements and do not tolerate any insider trading. We may use knowledge relating to insider relevant projects and processes only internally in accordance with the applicable intracompany rules and may not divulge such knowledge to any outside party, including family members (e.g., a spouse). Additionally, employees must not provide material, non-public information to others or make recommendations to anyone who may then trade related securities.

+ My Contribution

I do not engage in insider trading nor do I make any such recommendations to any third party or incite any third party to engage in insider trading. Furthermore, I do not divulge inside information unless this is required during my normal work in compliance with the relevant internal rules. I familiarize myself with the applicable internal rules. If I have access to inside information, I do not purchase or sell any securities or financial instruments based on this information. This applies not only to trading with shares of listed companies belonging to the Volkswagen Group or derivatives thereof, but also to trading with securities or financial instruments in general (i.e., also those of suppliers).

+ Examples

 You learn through your work with Navistar that the acquisition of a new business by the Volkswagen Group is going to be announced soon. You know that a very good friend currently holds shares of the Volkswagen group and is considering whether to sell those shares. Because the price of Volkswagen's shares will likely rise once the acquisition of the new area of business has been announced, you consider telling your friend to hold off on selling those shares.

 **Do not tip your friend off under any circumstances. Because the information of which you are aware is not public, but inside knowledge, you are not permitted under any circumstances to share this knowledge with others. Transmitting this knowledge directly or indirectly would be in violation of federal, state and local laws related to insider trading.**

+ References

Refer to Policy [Insider Trading](#) or consult with the Office of the Corporate Secretary or the General Counsel, if you have questions on whether information may be considered material and non-public, or for additional information.



Our Responsibility In The Workplace

It is in the fundamental interest of Navistar to protect the health and safety of every employee.

The principle of protection and security also applies to employee and customer data, as well as company specific know-how and company assets.

The Navistar's responsibility in the workplace specifically gives rise to the following principles:

Occupational Safety & Healthcare

Navistar is dedicated to conducting its business in a manner that protects the safety and health of its employees, contractors and visitors. We comply with all applicable local, state, and federal occupational safety and health laws and regulations in all countries in which we operate our business.

+ Corporate Principle

We promote the occupational health, performance, and job satisfaction of our employees through education, training, and support which allows them to perform their work in a safe manner. We also develop, administer, and continuously improve operational practices with the objective of preventing occupational injuries and illnesses.


+ My Contribution


I will strive to not put the health and safety of my colleagues or business partners at risk by maintaining a safe work environment for myself and my fellow employees by complying with applicable company policies and occupational health and safety rules, exercising caution, working in a safe manner.

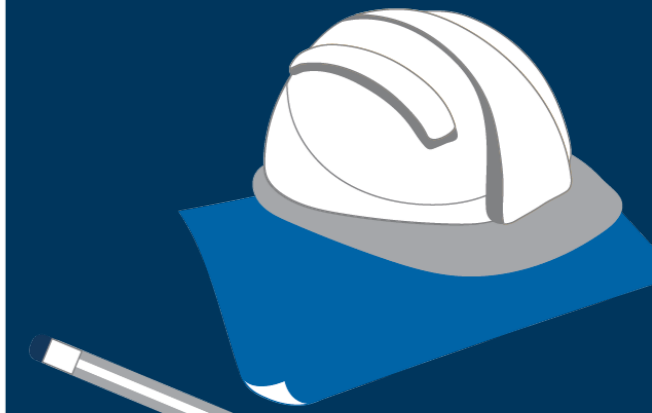
+ References

Refer to Policy **Safety, Health and Human Trafficking** for additional information. For guidelines for reporting safety-related issues, refer to the conclusion of the Code of Conduct or Policy **Report and Investigate Concerns**.

+ Examples

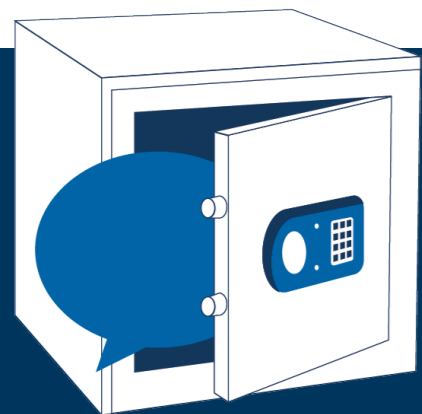
 You notice that a machine in your department has an electrical fault.

 **Take the machine out of operation, make sure the “out of order” sign is clearly displayed and immediately inform your manager or the facility management so appropriate steps can be taken.**



Data Protection

There are specific regulations and laws to protect privacy when dealing with personal data. These regulations and laws generally provide that the collecting, storing, processing and other use of personal data require the consent of the person concerned, a contractual arrangement or some other legal basis.



+ Example



You have organized a seminar for Navistar with external participants and receive personal data from the participants for it, such as home addresses. A colleague asks you to pass the addresses on.



Do not pass this data on without consulting with your manager, the Data Privacy Officer, or the Law Department. As a general rule, data may be used only for the purpose for which it was communicated.

+ Corporate Principle

We protect the personal data of employees, former employees, customers, suppliers and other affected parties. We collect, gather, process, use and store personal data in accordance with legal provisions. We report any identified breach of systems or theft of devices containing personal data immediately to the Global Security Department, as well as the Data Privacy Officer at DPO@Navistar.com.

+ My Contribution

I understand that personal data is collected, stored, processed, or used in any other way only with the consent of the person concerned, under a contractual arrangement or some other legal basis. All data processing components must be secured in such a manner that the confidentiality, integrity, availability, verifiability, and reliability of such sensitive data is guaranteed, and that unauthorized internal or external access is prevented.

When in doubt, I contact my manager, the Data Privacy Officer, the Law Department or any of the contacts listed on page [39](#).

+ Reference

Refer to Policy [Privacy Policy](#) for additional information.

Security & Protection Of Information, Know-How & Intellectual Property

Navistar holds internationally protected trademarks and patents, extensive trade and business secrets, and technical know-how. This knowledge is the basis of our business success. As such, protecting Navistar's intellectual property rights and avoiding infringement of the rights of others is essential. Unauthorized transmission of such knowledge may lead to extremely high losses for Navistar and it may warrant disciplinary actions, up to and including termination, in addition to claims under civil and criminal law for the employee concerned.

+ Corporate Principle

We are aware of the value of Company know-how and take great care to protect it. We respect the intellectual property of competitors, business partners and other third parties.

+ My Contribution

I handle all Navistar and Volkswagen Group information carefully and do not disclose it to unauthorized persons, in public spaces or on social media. I take particular care regarding information relating to technical know-how, patents, and trade and business secrets.

I signed a Confidentiality and Intellectual Property Agreement at the time of hire which assigns to Navistar all rights, title, and interest to patents on any inventions made by me that may be related to our business. I must not attempt to obtain or use another company's confidential information that was acquired through unethical or illegal means.

+ Reference

Refer to Policy [Intellectual Property](#) for additional information or contact the Law Department for consultation. Refer to Policy [Confidential or Proprietary](#) Information, or contact the Law Department, if you have questions pertaining to confidential or proprietary information or for additional information.

+ Example



You are involved in the development of innovative technology. You are to present the results of your research at various production sites and want to take your laptop, on which the relevant documents are saved, with you for presentation purposes. You intend to go over these documents again on the plane or the train on the way to the individual sites.



Strive to ensure that no one obtains knowledge of sensitive information belonging to Navistar, as this could lead to serious competitive disadvantages. Do not retrieve this type of information in places where third parties can easily access it or take note of it.

IT Security

Information technology (IT) and electronic data processing (EDP) have become an integral part of everyday life at Navistar. At the same time, they involve numerous risks, foremost of which are impairment of data processing as a result of malware (viruses), loss of data due to program errors, and data misuse (e.g., due to hackers). Sound security practices must be always employed to prevent unauthorized access to company systems and data.

+ Corporate Principles


We respect IT and EDP security and abide by applicable laws and regulations.

+ My Contribution

I familiarize myself with the applicable IT security policies and observe the rules contained therein. I must take all necessary measures to protect Navistar technology and associated data contained in or transmitted by the technology. I am aware that unencrypted data exchange (e.g., by e-mail or USB stick) is not a secure means of communication.

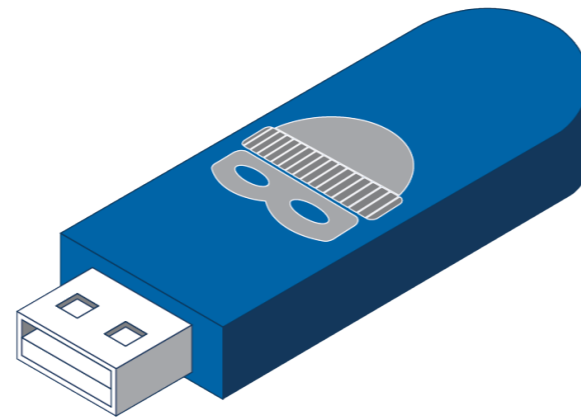
+ Examples

 You are out of the office and are given a USB stick to exchange a confidential document at a meeting.

 **Use only Navistar data carriers or data exchange systems and proceed according to the guidelines for information classification. Arrange for the document to be sent to you via an encrypted e-mail, for example. Never open e-mails or attachments that appear to be suspicious or that come from unknown e-mail addresses. That is how you prevent malware from entering the company network.**

+ References

Refer to Policies: [User Acceptable Use Policy](#), [Harassment Policy](#), [Privacy Policy](#), [Intellectual Property Policy](#), and [Confidential or Proprietary Information Policy](#) for additional information.



Handling Company Assets

Navistar's tangible and intangible assets serve to help our employees achieve the Company's business objectives and may be used for such purposes. Navistar employees may use Navistar technology for personal use, as long as the personal use is incidental to the business use, is limited to a reasonable amount, does not interfere with work done for Navistar, and does not result in any Navistar data being used for purposes other than Navistar business.


+ Corporate Principle


We respect Navistar's tangible and intangible assets and only use them for a reasonable amount for non-business purposes.

+ My Contribution

I adhere to the Company's rules and exercise care when handling company assets.

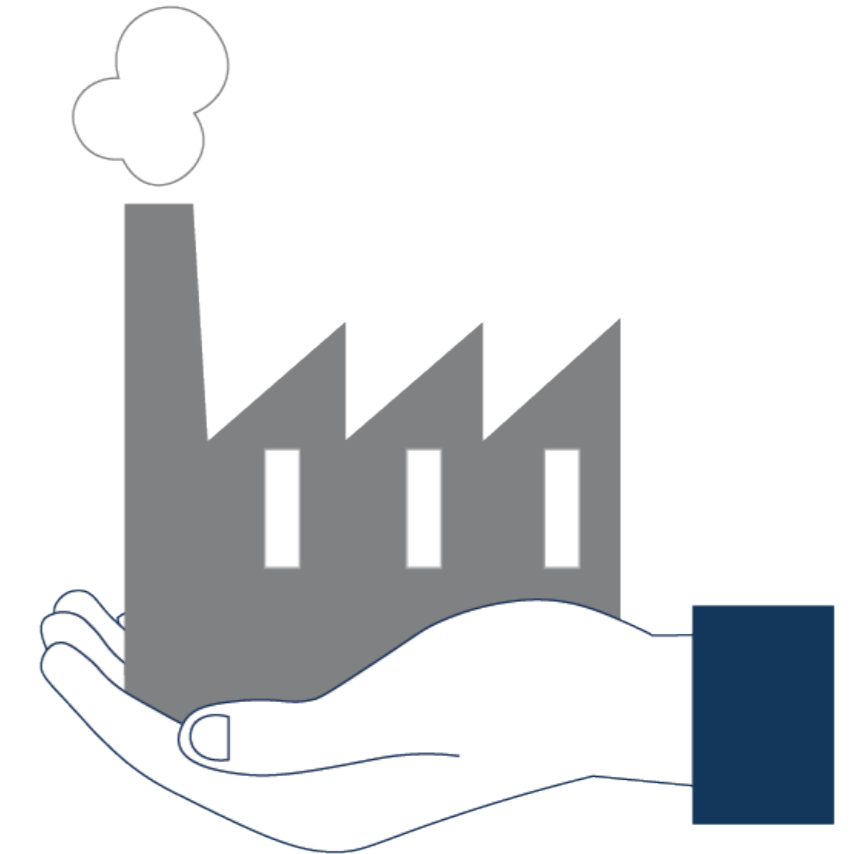
+ Example

 You are about to get married and you decide to use Navistar's high quality print center to prepare your invitations.

 **Printing invitations for a personal event would not be considered incidental to a company purpose and therefore you may not use Navistar's equipment.**

+ Reference

Refer to Policy [User Acceptable Use](#) for additional information



Support

If needed, internal and external points of contact provide support for dealing with the Code of Conduct. Furthermore, voluntary commitments and principles are applicable. All company policies of Navistar are available through the intranet.

+ Employee Representation

We recognize the right of employees to establish trade unions and pursue employee representations.

We are committed to working with employee representatives in candor and trust, to conducting a constructive and cooperative dialog, and to striving for a fair balance of interests.

Safeguarding the future of Navistar and its employees is achieved in a spirit of cooperative conflict management and social commitment, on the basis and with the goal of ensuring economic and technological competitiveness.

Employees have the right to unionize, to join together to advance their interests as employees, and to refrain from such activity. It is unlawful for an employer to interfere with, restrain, or coerce employees in the exercise of their rights.



Help/Contacts

For questions or concerns regarding policy or regulatory requirements, please reach out to any of the contacts below:

- Your Manager
- People & Culture Department
 - HRC@Navistar.com
- Corporate Compliance
 - ComplianceAdvice@Navistar.com
 - 1-331-332-2500
 - [Corporate Compliance Intranet](#)

If you prefer to remain anonymous:

- Navistar Ethics and Compliance Hotline
 - 1-877-734-2548
(1-877-7DIAL-IT)
 - www.Navistar.Ethicspoint.com
- Navistar's Law Department
 - [Who to call in Legal](#)
- Audit Committee
 - Audit.Committee@navistar.com



Self-Test for Decision Guidance

If at any time I am unsure whether my behavior complies with the principles set out in our Code of Conduct, I should ask myself the following questions:



1. Did I take all relevant matters into consideration and weigh them properly? (Content Test)
2. Am I confident that my decision is within the constraints of legal and company requirements? (Legality Test)
3. Do I stand by my decision when it is revealed? (Supervisor Test)
4. Am I in favor of all such cases being decided the same way companywide? (Universality Test)
5. Am I confident that my decision is within the constraints of legal and company requirements? (Legality Test)
6. Do I stand by my decision when it is revealed? (Supervisor Test)
7. Am I in favor of all such cases being decided the same way companywide? (Universality Test)

If my answer to questions 1- 6 is “yes” and the answer to question 7 is positive, my behavior is very likely to be compliant with our principles. If questions remain unanswered or if I have any doubts, I should get in touch with any of the points of contact listed on page [39](#).



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