



2024

CODE OF CONDUCT

NAVISTAR[®]



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

JUNE 2024

WE STRIVE FOR EXCELLENCE IN EVERY FACET OF OUR ORGANIZATION

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 Company, aiming to make a positive impact within the communities where we live and work, and to make 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 remain ethical and stay 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 on the authenticity of our products, solutions, operations, decisions and procedures.

Every employee, regardless of position or department, must act responsibly to represent 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 document to direct you in day-to-day operations.

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

OUR CORE VALUES

- **CUSTOMER FIRST**
Our current and potential future customers are the starting point of everything we do. Our understanding of our end customers' needs defines the value within our processes.
- **RESPECT**
We respect each individual. Everyone can contribute, has the right and obligation to be heard and has the potential to grow and learn over time. Respect is the foundation of all processes, all improvements, and all value creation.
- **TEAM SPIRIT**
We work in teams towards a common goal, united by a shared purpose. A team includes everything from the smallest group of colleagues, through each brand, up to the TRATON GROUP itself and partners. We work together in a transparent way. And we show the same team spirit in every team.



→ RESPONSIBILITY

We recognize that the TRATON GROUP is part of a greater society. We always act with integrity and look beyond our immediate areas of responsibility, considering the long-term impact of our actions. We take responsibility as a group, and as individuals for the sustainability and development of the society and environment we are part of.

→ ELIMINATION OF WASTE

The tireless work to identify and remove actions and activities that have no value to our end customers - that no one is prepared to pay for. This kind of waste can take many forms - overproduction, over processing, under processing, waiting, lack of collaboration, not using human potential, biases, and many others.

Anything that adds unnecessary costs to a process is wasteful, and all waste is disrespectful toward the people working in our processes. We continuously work to minimize unnecessary cost by eliminating waste.

WE ARE ONE

The Navistar Code of Conduct, OUR CODE, is the ethical and values-based foundation for acting with integrity and in compliance with the rules in our Company. It serves as a binding guideline for all employees of all functions at Navistar — all over the world.

Together, we bear responsibility for our workplace, as well as for Navistar's impact on the environment and society as a whole. We approach one another and everyone else with respect and fairness, as equals. We take a stance, we are steadfast and courageous, and we stand up for our values and principles — regardless of time, economic, or social pressure.

We are firmly convinced that it is essential for each and every one of us — employees, members of the Executive Team, and managers — to act with honesty to foster trust in our Company, our products, services, and innovations. That is why the decisions we take in all areas of work and in all roles must be in accordance with our core values and comply with applicable national and international laws, regulations, and internal voluntary commitments. This also holds true for the continued evolution of our Company as well as the selection, procurement, development, and use of innovative technologies. It also shapes how we bring value to our customers through our products, services, and collaboration. Transparency is important to us, and our approach to innovative technologies ensures that users' rights and security are respected.

We do not tolerate violations of the Code of Conduct. Anyone who violates our rules must expect appropriate consequences. To support adherence to our Code of Conduct, we must seek appropriate advice and counsel so that together, we can protect our Company, its values, and its reputation.

Each of us is personally responsible for complying with the Navistar Code of Conduct. It is up to all of us to familiarize ourselves with the Code of Conduct's principles and to be guided by them in our day-to-day decision-making - for a Company on the move, for the protection of people and the environment, and for future generations.

WE ARE COMMITTED INDIVIDUALS

We embrace our core values, principles, and rules, thus promoting trustful, sincere, and fair interaction with one another. We are all role models.

ETHICAL LEADERSHIP

WE LEAD BASED ON OUR VALUES

CORPORATE PRINCIPLE

We embrace our core values, principles, and rules, take responsibility for both personal and corporate growth, and lead by example. We perform our duties and manage in an appropriate, fair, and responsible manner.

This also applies to personal relationships in the workplace. Our decisions are guided by integrity, good judgment, and taken in the best interests of the Company and its employees, business partners, and shareholders. We strengthen our trust and shape change in the Company through our values-based leadership.

MY CONTRIBUTION

I am aware of my function as a role model both within the Company and in a broader context. My conduct and actions are guided by integrity and responsibility and based on this Code of Conduct as well as our core values, principles, and rules. I advocate interpersonal interaction in a spirit of trust, honesty, and fairness, and am open to different points of view.



EXAMPLE

💡 *To complete a project on schedule, your team would like to skip one step in the process. They say the step is unnecessary.*

i You point out that the valid processes must be followed, regardless of any pressure. Together, you search for a solution that complies with the requirements and our values. You undertake to revise the process in collaboration with everyone involved and, where possible, to make it leaner. You commit to that as a manager and team member.

CORPORATE PRINCIPLE

Respect for human rights is of vital importance.

We are convinced that sustainable economic activity is only possible when we act ethically and with integrity. We are fully committed to our responsibility regarding human rights. The Declaration of Human Rights adopted by the United Nations 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 U.S. federal, state and local laws pertaining to human rights and freedoms. Our activities are based on the UN Guiding Principles on Business and Human Rights, which determine the main cornerstones for our actions.

We respect and follow applicable regulations to protect human rights as a fundamental and general requirement throughout the world. We reject use of child labor and forced or compulsory labor as well as modern slavery and human trafficking.

We reject any involvement in war crimes, crimes against humanity, genocide, or other serious violations of international humanitarian law. This applies to the conduct of our Company and business partners.

HUMAN RIGHTS


WE TAKE RESPONSIBILITY FOR HUMAN RIGHTS


MY CONTRIBUTION

As a fundamental principle, I contribute to respecting human rights. I familiarize myself with the Navistar Policy Statement on Human Rights. If I become aware of human rights abuse, I take action. This applies not only to cooperation within our Company but also to the conduct of and toward business partners. I refrain from any form of threats, intimidation, or attacks against human rights defenders or whistleblowers.

If I have concerns or receive indications of human rights abuse in my professional surroundings, I inform my manager or get in touch with any of the contacts listed in the chapter on “Support”. Together we seek solutions to prevent or stop and remediate it.

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, the Corporate Compliance Department, the units responsible for sustainability in supplier relations or any of the contacts listed in the chapter on “Support”. Our Company must evaluate the information, examine business relations with this business partner more closely and, if necessary, terminate the relationship.

REFERENCE: Refer to our [Policy Statement on Business Human Rights](#), 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](#).

DIVERSITY, EQUAL OPPORTUNITIES, AND EQUAL TREATMENT

WE LIVE DIVERSITY

CORPORATE PRINCIPLE

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.

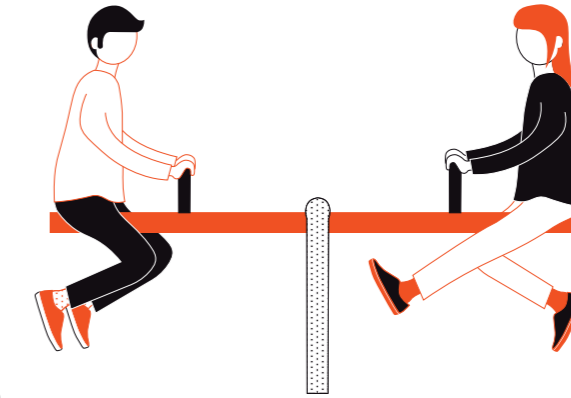
Equal opportunities and equal treatment under the law are key cornerstones of a fair, unprejudiced, and open approach. Navistar encourages respectful cooperation in a spirit of partnership, diversity, and tolerance. That is how we achieve a maximum degree of productivity, competitive and innovative capability, creativity, and efficiency.

We offer equal employment opportunities.

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.


REFERENCE: Refer to [Policy Equal Employment Opportunity](#) for additional information on hiring practices that support our commitment to equal opportunity and equal treatment.




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 in the chapter on “Support”.

EXAMPLE

 **A colleague you know personally tells you that a candidate for a job was probably turned down because she wears a headscarf, even though she was the most qualified candidate for the job.**

 Help to clarify the situation by informing your manager or the relevant People & Culture department immediately, or report this conduct to the Whistleblowing System so that appropriate investigation steps can be taken.

SPEAK UP



CORPORATE PRINCIPLE

We want to learn from mistakes and continuously improve. That is why we speak up about wrongdoings, or as soon as something does not feel right, even if it is awkward and uncomfortable. To do that, we promote a culture of integrity and actively seek dialogue within our team and with our direct manager. We seek advice and support if we have questions and problems. We protect everyone who contributes to this culture.

For us, compliance with external and internal rules and regulations at all times is a given. We do not tolerate misconduct. We believe that turning a blind eye can never be the right solution. That is why we react immediately and appropriately to misconduct and violations of the law, internal policies, and in particular our Code of Conduct.

Managers always lead by example through conduct that complies with our rules and regulations. They perform this important function by supporting employees to comply with the rules, promoting a speak-up culture, and following up on violations.


MY CONTRIBUTION

My first point of contact for questions, concerns, or the reasonable suspicion of a violation of an internal or external regulation is my manager. Alternatively, I can seek advice from the relevant subject matter experts.

The Corporate Compliance department as well as People & Culture (the HR department) are also available to provide support. In addition, I should report any reasonable suspicion of a regulatory violation via the Whistleblowing System. As a manager, I am obliged to report any reasonable suspicions of serious regulatory violations.

WE SPEAK UP WHEN SOMETHING IS WRONG

EXAMPLE

 ***You have agreed to follow the Code of Conduct that says you must report any illegal or unethical actions in your workplace. You've just seen your manager altering the numbers on your work output without asking you, to make it look like you met the quality goals.***

i This is a clear violation of the Code of Conduct and our values. You should speak up and report the incident to Corporate Compliance, the P&C department, or any of the contacts listed in the "Support" chapter. By speaking up, you are showing integrity and accountability, and protecting the reputation and credibility of the organization. Remember, if you see something, say something.

REFERENCE: For guidelines for reporting safety-related issues, refer to the conclusion of the Code of Conduct, our [Policy Report and Investigate Concerns](#), and our [Anti-Retaliation Policy](#).

ALCOHOL AND DRUG USE

PROVIDING ITS EMPLOYEES A SAFE PLACE TO WORK

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 co-worker is stumbling and has alcohol breath during your shift.***

i 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 Navistar's Ethics & Compliance Hotline.

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

WE DO NOT TOLERATE ANY THREATS, ACTS OF VIOLENCE OR OTHER FORMS OF INTIMIDATION IN THE WORKPLACE

CORPORATE PRINCIPLE

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, contractors or visitors.

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.

i Immediately report the incident to your manager, local security, People and Culture Department or Corporate Security Department. Reports can also be made through any of the contacts listed in the chapter on "Support".

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](#)

WE WORK TOGETHER IN CLOSE PARTNERSHIP — CONSTRUCTIVE, COOPERATIVE, AND FAIR

We respect freedom of association and collective bargaining. We recognize the right of all employees to establish trade unions and pursue employee representation.

We are committed to working with employee representatives in candor and trust, to conducting a constructive and cooperative dialogue, and to striving for a fair balance of interests. Professional dealings with employee representatives are part of our corporate culture.

Our goal of safeguarding the future of the Company and its employees through the spirit of cooperative conflict management and social commitment is equally important to our goal of ensuring economic and technological competitiveness.



WE ARE RELIABLE COLLEAGUES

We take our responsibility in the workplace seriously and protect what is valuable for our team, our Company, and our customers.

OCCUPATIONAL SAFETY AND HEALTHCARE

WE PRESERVE AND PROMOTE SAFETY, HEALTH AND WELL-BEING AT WORK

CORPORATE PRINCIPLE

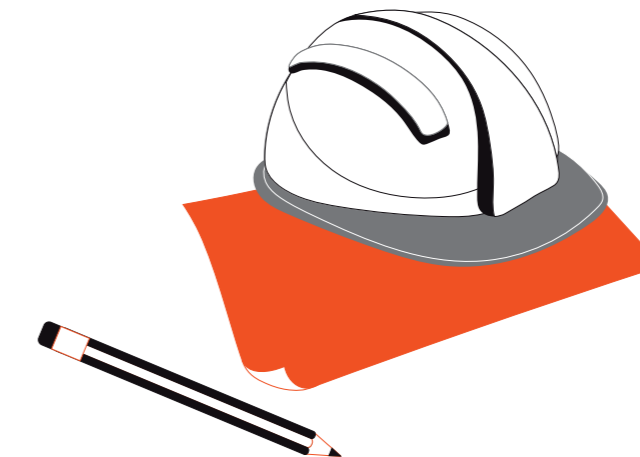
Navistar is dedicated to conducting its business in a manner that protects the safety, health and well-being of its employees, contractors and visitors.

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.

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.



EXAMPLE

! You notice that a machine in your department appears to have an electrical defect.

i 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.

REFERENCE: Refer to [Policy Safety and Health](#) 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](#).

WE PROTECT OUR ASSETS — WHETHER VISIBLE OR INVISIBLE


CORPORATE PRINCIPLE

We respect the Company's tangible and intangible assets and do not use them for non-business purposes, but solely to achieve the Company's business objectives. Exceptions are possible if internal policies and guidelines permit private use.

MY CONTRIBUTION

I adhere to the Company's rules related to use of the Company's tangible and intangible assets and exercise care when handling Company assets.

EXAMPLE

 **High-end software is installed on your business laptop. A friend who knows this asks you to lend him your laptop so he can use one of these programs for private purposes.**

i You say no, because you know that Company property and Company IT cannot be made available to third parties.

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

WE PROTECT INFORMATION AND INTELLECTUAL PROPERTY


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 Company information carefully and do not disclose it to unauthorized persons. I take particular care with regard to information relating to technical know-how, patents, and trade and business secrets.

EXAMPLE

 **You are involved in the development of an innovative technology. You are to present your development at various Company sites and want to take your laptop, which you have used to store the relevant documents, with you for presentation purposes. You intend to go over these documents again on the plane or the train on the way to the various sites.**

i You must make sure that no one obtains knowledge of sensitive information belonging to the Company, as this could lead to serious competitive disadvantages. Do not retrieve this type of information in places where third parties can access it or take note of it.



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.

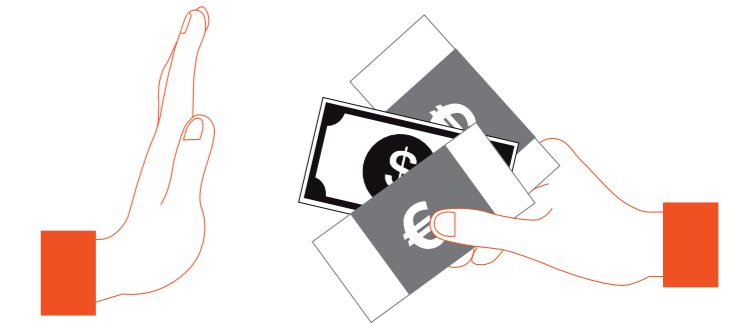
WE ARE RESPONSIBLE PARTNERS

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.

PROHIBITION OF CORRUPTION

WE DO NOT BRIBE OTHERS AND DO NOT ACCEPT BRIBES, AND WE REFRAIN FROM ENGAGING IN ANY TYPE OF CORRUPTION



CORPORATE PRINCIPLE

We do not tolerate corruption. Corruption means that someone abuses their professional position to gain an advantage for themselves or a third party and thereby harms others. We conduct business with our business partners, customers or other external third parties only in compliance with applicable laws and in line with existing internal rules. We must never accept, 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.

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 and/or are not in compliance with applicable law 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 Corporate Compliance or Law Departments. I refrain from engaging in any transaction or activity involving corruption of any kind. I keep myself informed by consulting internal rules or experts.

EXAMPLE

💡 *You work in software development, and you are asked to award a major sub-project to an external service provider. One of the service providers that has been invited to submit a bid offers you a large sum of money if you make sure their company gets the contract.*

i The conduct of the service provider constitutes attempted corruption. Clearly decline the money and inform your manager and the Corporate Compliance or Law department immediately.

REFERENCE: Refer to [Policy Anti-Corruption and Anti-Bribery](#) for more information. Refer to [Policy Gifts and Entertainment](#) or consult with the Corporate Compliance Department for additional information.

WE ARE CAREFUL WHEN ACCEPTING OR EXTENDING ANY GIFTS, HOSPITALITY OR OTHER BENEFITS TO/FROM THIRD PARTIES

CORPORATE PRINCIPLE

Our products and services define who we are. Therefore, benefits such as gifts, hospitality, and invitations to events are only permitted if they are appropriate.

Our internal policies set out what benefits are appropriate and what steps must be taken when accepting and/or granting them.

MY CONTRIBUTION

I familiarize myself with the policies on handling gifts, hospitality, and invitations to events, and strictly abide by them.

I check whether my behavior is appropriate and whether it might influence my business decisions.



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.

WE CONTRIBUTE TO SOCIETY IN ACCORDANCE WITH LAWS AND INTERNAL RULES

CORPORATE PRINCIPLE

We make donations (i.e., voluntary contributions with no expectation of consideration in return by the recipient), and grant sponsorships (i.e., contributions based on a contractually agreed consideration) to contribute to society. To avoid conflicts of interest and promote standard conduct within the Company, donations and sponsoring measures are permitted only in the context of the respective legal framework and in accordance with the applicable internal rules.

Donations and sponsoring measures are only granted in accordance with a transparent approval process.



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

MY CONTRIBUTION

If I consider a particular sponsoring measure by our Company to be worthy of support, I make initial contact with the appropriate departments in the Company, e.g., Communications, Corporate Compliance, and People & Culture.

The granting of donations must be transparent, i.e., the purpose, the recipient of the donation, and the financial management must be documented and verified. I comply with internal processes and do not initiate any donation that could damage the reputation of our Company.

EXAMPLE

A local politician asks you for a donation from your Company for the election campaign.

Turn down the request. Donations may only be granted after going through the required approval process. In this specific case, the donation cannot be approved because our internal guideline prohibits donations to political parties, related institutions, and politicians.

WE EXERCISE CAUTION WHEN DEALING WITH PUBLIC OFFICIALS

CORPORATE PRINCIPLE

We conduct our business with integrity and follow all anti-corruption laws and regulations. We recognize there is an increased risk of corruption when dealing with public officials or holders of political office, governments, authorities, and other public institutions. Our internal policies provide guidelines for handling these interactions, including regarding benefits, avoiding conflicts of interest, and corruption prevention. We do not make any facilitation or expediting payments. Such payments are sums paid to public officials to accelerate routine administration matters.

MY CONTRIBUTION

I am aware that there is an increased risk of corruption when dealing with public officials. Therefore, I familiarize myself with the applicable rules. I understand that I have a binding obligation to consult the Corporate Compliance and Government Relations departments in case of benefits granted to public officials.



EXAMPLE

In the course of an external technical audit to obtain a compulsory certification, you would like to invite the auditors to lunch.

i In this case, the audit organization employees must be considered public officials as they perform sovereign functions on behalf of the state by conducting the certification. For this reason, you have a mandatory obligation to involve the relevant Corporate Compliance department in advance. They can also help you to assess for each individual case whether the persons concerned are considered public officials.

REFERENCE: Refer to the [Policy Gifts and Entertainment](#), [Anti-Corruption and Anti-Bribery](#), and [Policy on Political Activities](#) for additional information or consult with the Law Department.

WE CAREFULLY CHECK WHO WE DO BUSINESS WITH

CORPORATE PRINCIPLE

We carefully select sales intermediaries, suppliers, service providers, and other partner companies based on objective criteria and make use of competition. We only cooperate with business partners in line with statutory requirements, internal rules, and guidelines. We check the integrity of potential business partners carefully before entering into business relationships and follow the engagement and payment procedures set out in our policies and regulations.

When purchasing or selling products and services, we involve the relevant departments in the process in good time in accordance with the applicable policies.

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

MY CONTRIBUTION

I check the integrity of potential business partners before entering into business relationships. I show no bias in favor of a supplier, service provider, or partner company without an objective reason, and I encourage competition.

I do not purchase any products or services without having first gathered information on the market and alternative suppliers. I follow the applicable procurement guidelines and involve the relevant purchasing department at an early stage before the planned delivery and performance of services in line with valid purchasing processes.

I make sure that remuneration is only paid for services that are actually rendered and that the payments are commensurate with the services rendered in order to rule out corruption risks.



EXAMPLE

It comes to your attention that a colleague would like to commission a supplier without involving the responsible purchasing department as required by the applicable procurement principles.

i Notify the responsible purchasing department or one of the contacts listed in chapter "Support" to select the best offer from an overall company perspective and that required due diligence checks are conducted.

WE TAKE DECISIONS BASED ON FACTS, THUS AVOIDING CONFLICTS OF INTEREST

CORPORATE PRINCIPLE

We act with integrity. That is why it is especially important for us to avoid creating potential conflicts of interest when performing our job responsibilities and to recognize and disclose possible conflicts that we face or observe. 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.

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 Corporate 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 Corporate Compliance and/or Law Department.

REFERENCE: Refer to [Policy Conflicts of Interest](#), [Policy Gifts and Entertainment](#), and [Policy Employment of Closely Related Persons](#) for additional information.

WE DO NOT SHARE INSIDER KNOWLEDGE

CORPORATE PRINCIPLE

We handle information pertaining to share performance in accordance with capital market requirements and do not tolerate any insider trading.

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 financial instrument, e.g., stocks and shares.

We may only use knowledge relating to insider-relevant projects and processes internally in accordance with the applicable internal policies and may not divulge such knowledge to any outside party, including family members, e.g., a spouse.

REFERENCE: 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 inside information, or for additional information.


MY CONTRIBUTION

I do not engage in insider trading, nor do I make any such recommendations to any third party or instigate any third party to engage in insider trading.

Furthermore, I do not divulge inside information unless this is required in the course of my normal work, and I comply with the relevant internal policies. I undertake to familiarize myself with the applicable internal rules.


If I have access to inside information, I do not purchase or sell any financial instruments based on this information. This applies not only to trading shares in listed companies belonging to the Group or derivatives thereof, but also to trading financial instruments in general.

EXAMPLE

 ***You learn through your work that the acquisition of a large company well-known worldwide is going to be announced soon. As part of your job, you have been informed that the Company's share price will rise significantly once this transaction has been announced. You know that a good friend is currently considering whether to sell their shares in that Company. You consider telling your friend that he should hold off on selling his shares.***

i Do not tip your friend off for any reasons whatsoever. Since the information of which you are aware is not public, but insider knowledge, you are not permitted under any circumstances to share this knowledge with others. Transmitting this knowledge directly or indirectly would make you liable to prosecution.

EXAMPLE

 ***Your manager asks you to check bids from several IT consultancy firms. You discover that one of the most favorable bids comes from a company owned by a good friend.***

i 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 Corporate Compliance department.

WE ARE COMMITTED TO ETHICAL BUSINESS PRACTICES

CORPORATE PRINCIPLE

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 economy, eventually making their source appear legal. Terrorism financing occurs when money or other resources are made available to commit criminal acts of terrorism or to support terrorist organizations.

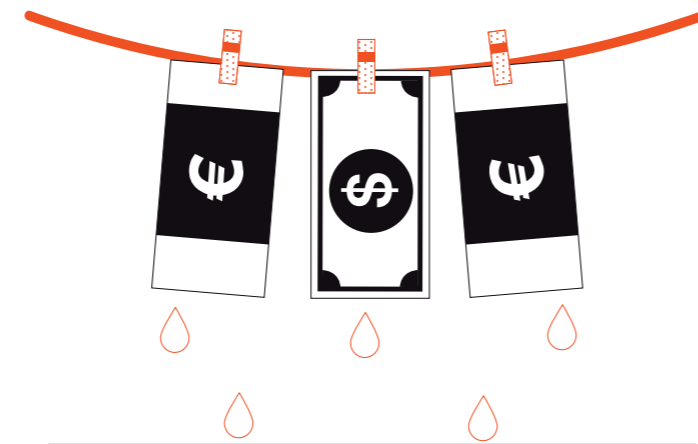
We carefully check the identity of customers, business partners, and other third parties with whom we wish to do business. We check for red flags that may indicate money laundering and perform appropriate follow-up measures when a red flag or suspicious transaction is identified.

We do not accept any involvement or participation in any illicit financial flows and take responsible actions to avoid this. We also comply with all applicable laws and regulations on money laundering and terrorism financing.

MY CONTRIBUTION

I take no action whatsoever that may violate money laundering provisions at home or abroad. I am vigilant and immediately assess any suspicious conduct on the part of customers, business partners, and other third parties. I follow internal policies and routines and if I see something, I take action. If I need help, I ask the responsible contact persons listed in the chapter on “Support”.

REFERENCE: Refer to [Policy Money Laundering and Terrorism Prevention](#) for additional information.



EXAMPLE

A customer or business partner has overpaid and asks for the excess amount to be repaid to an account held in another country or in cash instead of via bank transfer to the original business account.

i This kind of request requires an explanation. Do not accept the suggestion readily but ask the customer why the amount cannot be repaid through the same channel used for the original payment. Seek advice from the Corporate Compliance or Law department .

WE ARE COMMITTED TO FAIR AND FREE COMPETITION

CORPORATE PRINCIPLE

Fair and free competition is protected by antitrust legislation valid throughout the world. Complying with this legislation helps remove undue distortion of competition in the relevant markets — and benefits all market players. Not only does anti-competitive conduct have the potential to significantly damage the good reputation of Navistar, it can also incur severe fines, penalties, and financial compensation for damages. In particular, agreements and concerted practices between competitors intended to achieve or effect the prevention or restriction of free competition are prohibited. We do not enter into any anti-competitive agreements with competitors, suppliers, or customers. This includes the exchange of competitively sensitive information, such as prices and price components, terms and conditions as well as carving up customer groupings and territories, and restrictions on innovation.

If our Company holds a dominant market position, we do not abuse this position. We also take care in properly implementing merger control procedures required with regard to cooperation and transactions. We comply with the specific antitrust provisions for distribution systems in our dealings with our authorized distribution partners.

MY CONTRIBUTION

Whenever I come into contact with competitors, I make sure that no information is given or received that would allow conclusions to be drawn about current or future business conduct. In discussions or any other forms of contact with competitors, I avoid issues that could be of relevance for the competition among each other. If I ever encounter a forum where anti-competitive discussions are taking place, I act immediately in line with internal policies and processes.

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

EXAMPLE

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

i Make it absolutely clear to the competitor's employee immediately that you will not talk to him about such issues. This type of conversation — apart from the unauthorized disclosure of trade secrets — is also a violation of valid competition and antitrust legislation and could have drastic consequences for you personally, our Company, and both the competitor's employee and his company. Document this conversation and inform the relevant Corporate Compliance or Legal department immediately.

WE ARE COMMITTED TO CORRECT ACCOUNTING AND REPORTING

CORPORATE PRINCIPLE

Our business depends on trust. We strictly comply with the statutory provisions for proper accounting as well as financial and nonfinancial reporting. Transparency and correctness are our top priorities, because any irregularities may have serious consequences for the Company as well as for the persons responsible. To that end, through TRATON reporting, we regularly inform all capital market players of our financial position and business developments.

MY CONTRIBUTION

In my area of responsibility, I organize processes to enter all business financial and nonfinancial data correctly and promptly in the accounting and reporting system. If I have any questions about the correct recording of data, I contact my manager or the appropriate department.



REFERENCE: Refer to [Policy Relationship with Independent Auditors](#) for additional information.

EXAMPLE

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

i Do not take any such action. Entries must always be assigned correctly. Posting entries inaccurately may have serious consequences for the Company and for you as an employee.

WE ENSURE COMPLIANCE WITH ALL REGULATIONS IN CROSS-BORDER TRADE

CORPORATE PRINCIPLE

We are aware of our social responsibility to fulfill export control and sanctions obligations and expressly commit to complying with the relevant legislation.

Cross-border business processes and transactions may be subject to prohibitions, restrictions, approval requirements, or other supervisory measures under export controls and sanctions. These may relate to the relevant business partners, goods, countries, financial resources, or intended use. This applies to technologies and software as well as goods and products. In addition, it applies to

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

temporary cross-border transfer and technical transmissions, for example, by e-mail or cloud. Certain imports may be subject to export control regulations. We comply with applicable export control regulations and the relevant internal policies.

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.

MY CONTRIBUTION

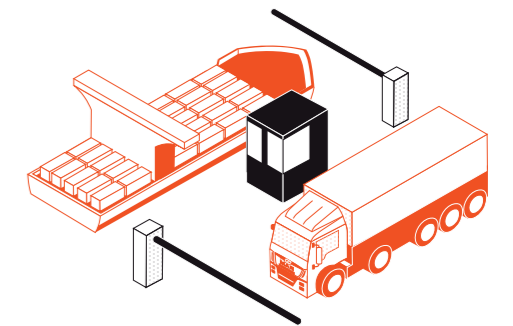
I am responsible for carrying out the relevant processes and activities in compliance with export controls and sanctions. I keep myself up to date with policies and procedures on export controls and sanctions. When I need help in my day-to-day work, I get back to the respective export control staff.

Should I become aware of export control regulations being violated in my area of responsibility, I will immediately inform the relevant export control unit and contribute to remedy such violations and to prevent them occurring again in the future.

EXAMPLE

You would like to enter into a business relationship with a potential customer who might be on a sanctions list.

i Make sure you comply with valid legislation. Contact the relevant export control unit to coordinate the next steps.



WE ARE GOOD CORPORATE CITIZENS

We share responsibility for society and strive to contribute to sustainable development.

WE COMMUNICATE CLEARLY AND RESPECTFULLY

CORPORATE PRINCIPLE

We communicate clearly and consistently to maintain the confidence of customers, investors, and other stakeholders. Before committing to and/or executing any communication or marketing measures, such measures must first be coordinated with all relevant departments. Thoughtfulness and respectful interaction with one another are second nature to us.

MY CONTRIBUTION

I do not issue any public statement on behalf of the Company and always refer any inquiries to the Communications department. If I make any comments at public, trade, or cultural events or on the Internet, I make it clear that I am voicing solely my own personal opinion. I consult the Company's social media guidelines for advice on proper conduct in social networks.



EXAMPLE

i *An employee has made comments to the media about product sales from another brand. This gives the impression that the employee is speaking for the Company in an official capacity.*

i Contact the employee and explain that official comments about the Company and its products can only be made by authorized spokespeople approved by Communications.

Forward the comments to Communications with a request to check whether a public response is necessary.

Reference: To reach Corporate Communications, contact Corporate.Communications@Navistar.com. To reach Investor Relations, contact 1-332-332-5000. Refer to [One Voice Policy](#), [Media Relations Policy](#), and [Social Media Policy](#) for additional information.

WE REPRESENT OUR COMPANY'S POSITIONS IN A RESPONSIBLE AND CLEAR WAY

CORPORATE PRINCIPLE

As a member of society, the Company can promote its positions during decision-making processes, such as those for legislation plans for the transformation of our industry, through political lobbying. We conduct lobbying centrally and in line with the principles of openness, accountability, and responsibility.

To this end, political legislative processes that have an influence on our business model and on the transformation of the transport industry are evaluated critically and constructively and our interaction with political parties and interest groups is based on the principle of neutrality.

Undue influence on political decision makers or on legislation, which violates the law or our own principles, is not accepted and tolerated.

MY CONTRIBUTION

I do not attempt to participate in political decisions on behalf of the Company if I am not authorized to do so. If I am authorized to do so, I observe the relevant internal policies and applicable laws in the performance of my duties.



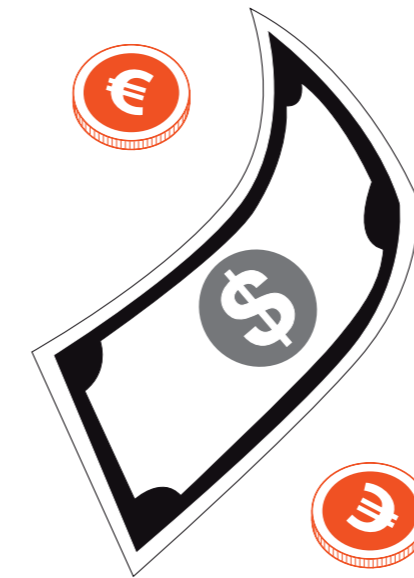
EXAMPLE

You have a relative who works for the transport ministry and who asks for your opinion on draft legislation that will impact the automotive industry. He also asks you for the Company's position on this legislation.

i Do not comment. Political lobbying in the Company is always coordinated centrally and conducted openly and transparently. The authorized contact for all such lobbying activities is the Governmental Relations department.

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

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, or 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.

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.

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

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

WE COMPLY WITH TAX AND CUSTOMS REGULATIONS

CORPORATE PRINCIPLE


As a global company, we are aware of our responsibility to meet our obligations with regard to foreign trade, taxes, and customs, and we explicitly comply with national and international legislation. All relevant tax laws, regulations and rules are obeyed, as well as reporting duties and disclosure requirements are fulfilled. All relevant taxes and levies are timely filed and paid.

MY CONTRIBUTION


In my area of responsibility, I design internal structures and processes to pay the taxes and customs by the Company correctly, promptly, and in full, are disclosed in reporting, and are paid to the relevant fiscal authorities.

If I have information concerning a violation of tax and customs regulations in my area of responsibility, I undertake every action I can to prevent or stop this violation. If that is not possible, I seek advice from the relevant Tax or Customs department.

EXAMPLE

 **You are responsible for posting certain business transactions, for example general overheads such as maintenance expenses, and production costs, in the statutory financial statements.**

One project exceeds certain controlling parameters early on in the fiscal 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.

WE HANDLE DATA CAREFULLY

CORPORATE PRINCIPLE


We attach great importance to handling data responsibly, securely, and transparently. We protect the personal data of employees, former employees, applicants, customers, suppliers and other business partners.


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

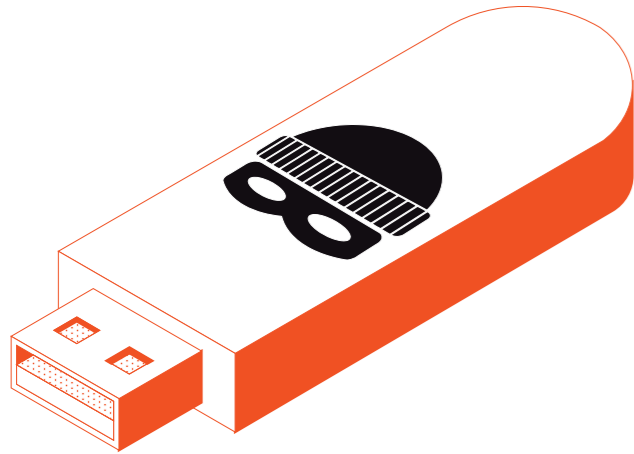
I handle personal data confidentially, and my actions are clear and transparent. I integrate data protection in my actions and processes and secure confidential data in my area of responsibility. I take responsibility and pay attention to secure data exchange throughout the value chain. If in doubt, I contact my manager, the Law Department or the relevant data protection department at DPO@Navistar.com.

EXAMPLE

 **You have organized a seminar with external participants and receive personal data in connection with the seminar. A colleague asks you to pass on the addresses in order to send the participants commercial communication on our products and services.**

 Do not pass this data on without first consulting your data protection organization. As a general principle, data may only be processed for the purpose for which it was collected.

WE SECURE OUR IT SYSTEMS



CORPORATE PRINCIPLE

We respect IT security and abide by the applicable information security regulations.

The information security regulations provide guidelines for all employees.

MY CONTRIBUTION

I familiarize myself with the applicable IT security policies and observe the rules therein.

As part of the IT security chain, I make my active contribution by being vigilant at all times and keeping my basic IT security skills up-to-date.

EXAMPLE

💡 *A supplier suggests you use a local virtual meeting application for an online meeting. However, the application is not installed on your business laptop, nor is it available for download from the IT department's software pool.*

i Ask your IT department about alternative solutions for the online meeting. Do not download unauthorized software or try to install such software.

WE TAKE PRIDE IN BEING COMMITTED TO PROVIDING SAFE, ENVIRONMENTALLY FRIENDLY, HIGH-QUALITY PRODUCTS AND SERVICES

CORPORATE PRINCIPLE

Countless people come into contact with our products and services on a daily basis. We give high priority to the conformity and safety of our products. We are committed to preventing risks to health, safety, the environment, and the assets of our customers or third parties resulting from the use of these products.

We develop our products to comply with all applicable regulations. Once they have been put on the market, our products are monitored in the field so that appropriate measures can be promptly initiated in the event of possible discrepancies. We do not make any compromises in this regard.

MY CONTRIBUTION

I carefully comply with all relevant provisions in my day-to-day work. I set realistic goals. If there is a conflict of goals, the conformity of our products always has top priority, regardless of time or cost pressure.

That is why I embrace our defined processes and continuously improve them. I work together with my colleagues to identify and close gaps in processes to meet all binding obligations. I contact my manager, the Product Safety or Product Compliance team if I have any questions or concerns about product compliance.

EXAMPLE

💡 *A customer contacts you to report a technical problem with a product. You are not sure whether the problem is due to an operating mistake on the customer's part, but you cannot definitively rule out a manufacturing or construction defect.*

i Follow the applicable processes to clarify the issue and report the problem immediately to the relevant departments and Product Compliance.

ENVIRONMENTAL PROTECTION

CORPORATE PRINCIPLE

As a global commercial enterprise, we take responsibility for the environmental compliance, compatibility and sustainability of our products, locations, and services. Our Company aspires to be a provider of sustainable mobility and a role model for protecting the environment. We focus on advanced and efficient technologies for reducing our environmental footprint, which we implement throughout the entire lifecycle of our products.

From the very early phases of development and production onward, we work to manage natural resources carefully and continuously reduce the environmental impact. We comply with environmental protection laws and regulations. We are committed to decarbonization throughout our entire value chain and across all relevant scopes. We strive to avoid harmful soil contamination, water pollution, air pollution, harmful noise emission, or excessive water consumption. We are aware of and diligently implement our environmental management systems.

Furthermore, we constantly reassess the environmental compatibility of our products and manufacturing processes, optimizing these where necessary.

We are a responsible member of society and engage with local and state governments.

We seek dialogue with these players on future mobility concepts and on shaping ecologically sustainable development.


MY CONTRIBUTION

I am mindful of environmental protection in my work and use resources and energy economically and efficiently. I make sure my activities have the smallest possible impact on the environment and that they comply with environmental protection laws and regulations. I draw attention to noncompliant or unsafe actions or conditions.

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

WE SHARE RESPONSIBILITY FOR THE ENVIRONMENT

EXAMPLE

 ***You notice that a waste container does not appear to be labelled in compliance with requirements and has been left with a lid ajar.***

i You notify the facility environmental personnel of the situation and, if you have the proper knowledge, correct the situation yourself.

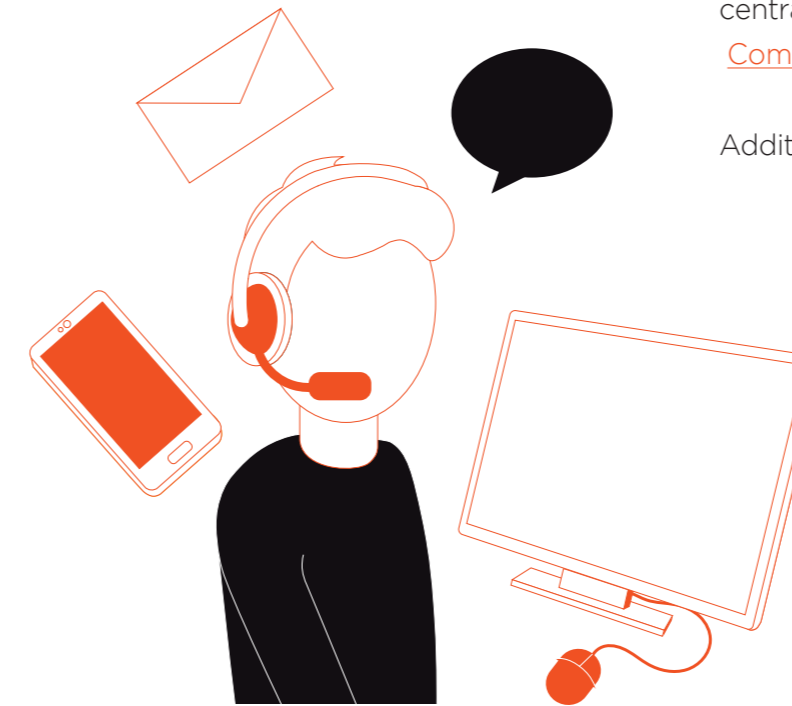
SUPPORT

WE OFFER SUPPORT IN UNDERSTANDING AND IMPLEMENTING THE CODE OF CONDUCT

Our first point of contact for any questions or uncertainties regarding the Code of Conduct is our manager.

Additionally, our Compliance department is available to our employees via the central Compliance Help desk at [ComplianceAdvice.Navistar.com](https://www.complianceadvice.navistar.com), by email at ComplianceAdvice@Navistar.com or by phone at 331-332-2500.

Additional support contacts include People & Culture, Legal, and Corporate Security.



PREVENTING MISCONDUCT, POINTS OF CONTACT, AND THE WHISTLEBLOWING SYSTEM

Our Code of Conduct provides the binding framework for acting with integrity and in compliance with the rules within Navistar. As Navistar employees, we have a responsibility to respect the principles of our Code of Conduct to prevent violations or wrongdoings and thus avoid damage to Navistar, its employees, and third parties. Potential violations of the law and Navistar's policies in particular of the Navistar Code of Conduct are investigated fairly and promptly and are treated with the highest level of confidentiality. Depending on the seriousness of the violation, this can have disciplinary, civil, or criminal consequences for the employees concerned. Proven misconduct can also have an impact on remuneration. That is why we talk to our manager or seek expert advice immediately if we have any questions or concerns, or if we suspect there has been a violation of internal or external regulations. We should provide all information concerning such violations to the whistleblower channels, such as the Navistar Investigation Office or at least to one of the following contacts: our direct manager or our Compliance Help desk.

In addition, we can submit reports on potential regulatory violations via the Navistar Whistleblowing System. We can give our name, or we can make the report anonymously. We are aware that the Navistar Whistleblowing System has responsibility for investigating reports of potential regulatory violations. Regulatory violations are all intentional or negligent violations of regulations of applicable law or internal company policies (especially violations of the Navistar Code of Conduct) committed by employees in connection with, or based upon, their employment by Navistar. Managers have a special function as role models. The decisions they make for the Company must always take account of values and regulations. This includes immediately reporting reasonable suspicion of a serious regulatory violation.

The purpose of the Whistleblowing System is to protect our Company, the whistleblower, and all persons who contribute to investigating and putting an end to the misconduct. Retaliation against them is itself considered a serious violation.

At the same time, the Whistleblowing System protects the interests of the persons implicated conducting all investigations in a fair and unbiased manner. The work of the Whistleblowing System is based on uniform processes and the confidential, professional processing of reports. Abuse of the Whistleblowing System is not tolerated and will be disciplined accordingly.

Potential violations of the Code of Conduct for Suppliers and Business Partners, including serious risks, violations of human rights, and environmental violations by direct and indirect suppliers and other business partners, can also be reported to the Navistar Investigation Office.

PREVENTING MISCONDUCT, POINTS OF CONTACT, AND THE WHISTLEBLOWING SYSTEM

We can access the Whistleblowing System through the following channels:

Navistar's 24/7 Ethics and Compliance Hotline

The hotline is available around the clock, in various languages and is operated by a third party, allowing whistleblowers to report concerns anonymously, if desired.

- (877) 734-2548 or (1-877-7-DIAL-IT)
- navistar.ethicspoint.com

To dial the Hotline from a Global location, see below:

- In Mexico dial: 800-681-1826
- In Argentina dial: 0800-345-3112
- In Chile dial: 800914421
- In China dial: 4001209365
- In Colombia dial: 01-800-519-0896
- In India dial: 000-800-0501-374

Navistar's Investigation Office

InvestigationTeam@Navistar.com

TRATON's 24/7 Speak Up! Hotline

You can make a report at 365 days, 24 hours, by accessing the SpeakUp! portal from any internet-enabled PC using the online address:

bkms-system.net/TRATON

TRATON's Investigation Office

Investigation-Office@TRATON.com

Further information on the Navistar Whistleblowing System and contact channels is available on our website under About Us and Governance: [Whistleblower Reporting Channels](#).

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 company-wide? (universality test)
5. Do I still think my decision is right when my company has to justify it in public? (public test)
6. Would I accept my own decision if I were affected? (involvement test)
7. What would my family say about my decision? (second opinion)

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 in this chapter.



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