

International Policy Statement on Human Rights

Preamble

We, International Motors, LLC¹ (International), have approximately 15,300 employees worldwide and are part of TRATON SE, one of the world's leading commercial vehicle manufacturers. Our primary business operations are in the United States, Canada and Mexico, with the largest dealer and service Network in North America. With more than a million of our trucks on the road in the U.S. one in five Class 6 through 8 vehicles is an International® truck and nearly half of all school buses on the road today are our IC Bus® brand. In addition, our Escobedo Assembly Plant in Mexico produces a full range of Class 8 vehicles. Sub-assemblies are produced for International trucks here, making us internal suppliers for our own production lines and other International and IC Bus manufacturing plants in the U.S.

Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Our definition of human rights also includes environmental aspects that can ultimately affect human rights.

International commits to respecting human rights and following applicable human rights due diligence laws as reflected in this International Policy Statement on Human Rights. We have set the framework for respecting human rights within our organization through our internal policies and procedures and by setting expectations for business conduct within our supply chain.

Scope

This document outlines our commitment as we move forward as a Company. The principles stated therein shall be incorporated and inherent in our systems and processes. We communicate this Policy Statement to our employees via our internal processes, employee training and awareness measures, and the [Code of Conduct for Employees](#).

International's management is responsible for the implementation of the actions and requirements defined in this commitment. International has the responsibility to adequately address negative human rights impacts that are linked to our own business area, products, or services through our business relationships. Therefore, we strive to work with business partners who share these values and the commitment outlined in this Policy Statement. Where there are conflicting local human rights laws or standards, or where state jurisdiction and/or enforcement is different from international human rights laws or standards, we shall seek ways to respect human rights in line with international human rights conventions and standards while complying with federal, state and local laws.

Our commitment to human rights and environmental aspects

At International, we take responsibility, not only for our products, but also for our people and for the consequences our business can have. We strive to eliminate any negative human rights impact by continuously reviewing our business operations and implementing early stage preventive measures to identify risks. We integrate human rights into our internal processes and respect all applicable legislation in force to protect human rights. We stress this in our internal policies and due diligence processes, where we strive to involve relevant stakeholders along the way. If we identify a violation of human rights or environmental obligations, we will take immediate action to prevent, stop or minimize the extent of the violation. With our principles mentioned below, we explain how we want to live up to our commitment to human rights.

International does not accept violations of human rights

A dedicated chapter in our [Code of Conduct for Employees](#) emphasizes the importance of human rights. Our employees are trained on the [Code of Conduct for Employees](#) in web-based and/or face-to-face trainings. Moreover, our employees receive

¹ International Motors, LLC d/b/a International Motors USA LLC in Illinois, Missouri, New Jersey, Ohio, Texas, and Utah.

specific training on business and human rights to provide guidance and raise awareness of our corporate responsibility for this topic. Our employees can address questions on human rights via our Compliance Helpdesk or contacting the Law Department. Our [Code of Conduct for Suppliers and Business Partners](#) cascades responsibility through the supply chain by clearly outlining our expectations for suppliers related to human rights, labor rights, environmental protection, business ethics and responsible supply chains. This Code of Conduct is referred to in International's standard terms and conditions.

International applies high standards for human rights at work

A central element of our human rights management is our risk analysis. We conduct a human rights risk assessment of our operations on a regular basis (as well as ad-hoc when needed). Going forward, we plan to validate and refine the risk assessment regularly (consistent, complete, up to date) and identify specific areas for further analysis. Risk assessment results are consolidated at the TRATON group level and results can be seen in the [TRATON BHR Statement](#). Human rights risks are not only assessed in our own business area but also considered in the selection and due diligence process of suppliers and business partners. On the sales side, red flags on human rights are part of the risk assessment process and we use tools to help us check the integrity of business partners before any engagement can take place.

Our dedication to protecting human rights, as guided by our internal policies, extends to the following areas:

- **Rejection of forced or compulsory labor**

As described in the [Code of Conduct for Employees](#) as well as the [Code of Conduct for Suppliers and Business Partners](#), International rejects forced or compulsory labor as well as modern slavery and human trafficking. This includes work carried out involuntarily due to intimidation, penalty, or violence by security forces. We thrive to protect our employees and ensure a safe and healthy working environment for everyone.

- **Rejection of child labor and young workers**

Child labor is prohibited at all costs. Federal, state and local laws determine the minimum age for employment, which must be adhered to.

- **Equal treatment in employment**

International strictly prohibits any conduct in violation of our internal policies related to equal treatment or 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. We promote and protect a culture of diversity, equity, and inclusion.

- **Occupational health and safety**

International 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.

- **Commissioning of security forces**

Security operations are conducted in line with International's Security Policy, which sets the protection of people as one of its primary objectives. International's Security organization takes the lead in liaising with security providers and security authorities. A diligent selection process for external parties, contractual obligations, and close monitoring of the operations aim to ensure that security forces commissioned or used by International adhere to the principles for our employees' protection.

International addresses environmental risks that could affect human rights

International is a global provider of commercial vehicles as well as associated services. Being in this position, International is aware of its special responsibility toward the environment. We bear responsibility for the environmental compatibility

and sustainability of our products, locations and services. 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 to mitigate and avoid any risks that might have an effect on human rights.

International uses its influence to prevent and address human rights risks

We regard human rights violations as a dynamic and permanent risk. We align procedures to monitor these risks with ongoing processes such as the implementation of human rights and environmental aspects in the compliance risk assessment. At the same time, we have a responsibility to remediate when we have caused or contributed to a human or a civil rights violation. Therefore, we have implemented the following measures for our business partners and suppliers:

- **Code of Conduct for Suppliers and Business Partners**

We have defined core elements of our supplier management in our [Code of Conduct for Suppliers and Business Partners](#). This document sets out our contractually binding expectations for the conduct of suppliers and business partners regarding key human rights-related, environmental, social, and compliance-related standards. Suppliers, as well as business partners of International are required to commit to the [Code of Conduct for Suppliers and Business Partners](#) before we engage in business with them.

- **Sustainability rating**

A central tool in this area is the sustainability rating (S-Rating) process, which is used to evaluate our direct suppliers' social and environmental performance. Suppliers' S-Rating results are shared across all TRATON brands. International is aiming to send a signal to suppliers by tying sustainability performance directly to award eligibility for contracts of a certain volume. The goal is to encourage collaboration when it comes to sustainability aspects within the supply chain. The primary objective is not to exclude suppliers from the supply chain, but rather to encourage them to achieve a positive S-Rating. If necessary, International appoints independent auditors to conduct risk-based sustainability checks on site. Any resulting shortcomings must be remedied by the suppliers using precisely defined measures as part of an action plan with firm deadlines.

- **Media screening**

Continuous, risk-based media screening of relevant suppliers is conducted. If a potential violation of our [Code of Conduct for Suppliers and Business Partners](#) is identified, it is examined and processed through the supply chain grievance process, as necessary.

- **Supplier and employee qualification**

Training of our procurement employees and suppliers is a central component of our strategy and essential for improving sustainability in the supply chain.

- **Supply chain grievance mechanism**

The supply chain grievance mechanism is used to process allegations related to human rights and environmental risks, as well as violations of human rights or environmental obligations, by our supply chain as stipulated in our [Code of Conduct for Suppliers and Business Partners](#). Allegations can be reported to International's Ethics and Compliance Hotline.

International recognizes the right to defend human rights and speak up against human rights violations

For us, human rights are non-negotiable. We do not tolerate harassment against protectors of human rights. At International, tip-offs regarding potential regulatory violations, including violations of human rights, can be reported by employees, business partners, direct and indirect suppliers, customers, and other third parties at any time and in any language, anonymously if desired, through the International and/or TRATON Hotline:

International's 24/7 Ethics and Compliance Hotline

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

TRATON's 24/7 Speak Up! Hotline

- www.bkms-system.net/TRATON

The International Investigation Office is responsible for processing tips concerning International and monitors/coordinates investigations together with the responsible Investigating Unit. The International Investigation Office confirms receipt of the tip and aligns with the whistleblower on additional relevant information, wherever possible and necessary. If the International Investigation Office is informed about a potential risk that does not involve International employees, e.g., potential violations by suppliers, the International Investigation Office will forward this information to the Supply Chain Grievance Mechanism (SCGM) Team at International.

The SCGM Team is responsible for investigating allegations of risks to human rights and the environment as well as violations of human rights or environmental obligations by direct and indirect suppliers of International. Results of an investigation are reported to either the Cross Functional Grievance or the Business Human Rights Committees, who decide on further measures to be implemented.

International addresses human rights violations appropriately

Our measures and guidelines for human rights are structured to protect all rights holders to the best of their ability. Reacting and responding to possible violations is therefore an essential part of our human rights risk management system. When we receive information about cases of suspected misconduct, we investigate immediately and find solutions to stop actual violations and limit and mitigate the negative impact. In the event of substantiated knowledge of a violation in our supply chain, we seek dialogue with our supplier or business partner and try to first find a common solution that ensures future adherence to human rights. If required, we make use of contractually agreed audit rights to obtain further information on potential violations and risks and for identifying and implementing mitigating measures. However, if suppliers do not take sufficient action to prevent, end or mitigate the extent of human rights violations, this may result in the termination of our collaboration with the supplier or business partner.

Responsibilities for human rights

We have defined clear responsibilities in our human rights risk management system within our organization. Moreover, our Business & Human Rights Committee monitors and advises on International's human rights program, including but not limited to the following topics: risk management system, risk analysis, preventive measures, remedial actions and grievance mechanism. It meets regularly on a quarterly basis and ad-hoc, if necessary.

Within International, human rights are governed by a cross-functional team including but not limited to Corporate Compliance, Procurement, Legal, Sustainability and People & Culture.

We continue to develop and improve our human rights risk management system. We particularly consider results of our risk analysis and seek insights from our internal stakeholders, which enables us to identify human rights challenges and continuously enhance the effectiveness of our measures to prevent, mitigate and remedy our adverse impact.