

NAVISTAR[®]

Whistleblower Reporting Channels

Our Whistleblower System

Navistar's top priority is compliance with statutory regulations, internal rules and the principles laid down in our Code of Conduct and the Code of Conduct for Business Partners. Navistar's success is rooted in Integrity and Compliance. To meet these standards and to avoid or minimize potential risks, it is crucial that potential violations by employees or external partners are identified at an early stage, clarified, and stopped, and that disciplinary measures are applied where necessary. To encourage a speak-up culture and to detect potential wrongdoings, Navistar, as part of the TRATON GROUP, operates a global independent, impartial, and confidential whistleblowing system.

Besides the Navistar Investigation Office as the first contact point for whistleblowers, the TRATON Investigation Office can also be addressed as a point of contact. Navistar will work with the TRATON Investigation Office regarding any serious regulatory violation.

The whistleblowing system and procedures for conducting internal investigations are governed by the Navistar Report a Concern Policy.

Our whistleblowing system is based on fundamental principles such as the protection of whistleblowers and persons concerned of or supporting the investigation. We respect whistleblowers' right to confidentiality, and we conduct all investigations in a fair and unbiased manner. Information received via the whistleblowing system will be reviewed fairly, promptly, and in a sensitive manner and will be treated with the highest level of confidentiality. No actions are taken to identify anonymous whistleblowers. However, any report in bad faith will be treated as serious regulatory violation.

Navistar will not tolerate retaliation against whistleblowers or any persons who contribute to investigations. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire or promote, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

If you see someone violating our policies, or procedures, or if you suspect unethical, illegal, unsafe activity or misconduct, we encourage you to use the following reporting channels.

How does Navistar process a report?

At our Company, reports regarding potential regulatory violations can be reported by employees, business partners/counter parties, customers, and other third parties through various channels, at any time, and in any language. Reports are then received by the Navistar Investigation Office, which ensure that thorough and appropriate investigations are carried out in a confidential and timely manner.

The qualified and experienced colleagues at the Navistar Investigation Office examine every report on potential misconduct thoroughly and follow the process according to the applicable Navistar Policy systematically. This process includes gathering facts, including from the whistleblower if possible. Afterwards, the Investigation Office along with the Investigation Oversight Committee will assess the

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results of the investigation and recommend appropriate action. Upon completion of the investigation, Navistar will issue a written response to the Complainant as appropriate.

Potential violations of the Code of Conduct for Business Partners by suppliers, including serious risks and violations of human rights and environment by direct and indirect suppliers, may also be reported to the Investigation Office -as well as reports requiring otherwise immediate action. The Investigation Office will inform the responsible departments, who will process the issue accordingly. This particularly includes taking the necessary measures to minimize or end violations and/or risks.

Potential violations of the [Code of Conduct for Suppliers and Business Partners](#) by business partners /counter parties, suppliers, and other third parties, including risks and violations regarding human rights and environmental obligations, can also be reported to the Navistar or TRATON Investigation Office. The responsible departments, who will process the reported matter, will be informed accordingly. This particularly includes taking the necessary measures to minimize or end violations and/or risks.

In addition to this, Navistar has published a Policy Statement on Human Rights, describing the expectations on the organization and suppliers and business partners to protect and respect human rights: [Navistar's Policy Statement on Human Rights](#).

Do you have any concern or feedback regarding a Navistar product or service?

If you have any questions or inquiries regarding our products or your vehicle, feedback or complaints about services provided by us or our business partners (such as dealerships), please contact our customer service.

Making a report to our Whistleblower System

The Whistleblower System offers various channels to report potential employee misconduct or potential violations of the Code of Conduct for Business Partners by suppliers in our Supply Chain.

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.

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



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- In **Colombia** dial: 01-800-519-0896
- In **India** dial: 000-800-0501-374

TRATON's 24/7 Speak Up! Hotline

- You can make a report at 365 days, 24 hours, using the international toll-free number:
 - **USA** (833) 657-1574
 - **Mexico** 001-800-4610242
- If your local telephone provider does not support the toll-free service, you can call the following chargeable number:
 - **USA** (908) 219-8092
 - **Mexico** 0155-71000355
- Speak Up! can be accessed from any internet-enabled PC using the online address <https://www.bkms-system.net/TRATON>.

Contacts within the Investigation Office

Navistar's Investigation Office: InvestigationTeam@Navistar.com

TRATON's Investigation Office: Investigation-Office@TRATON.com

Do you have further questions?

Questions or suggestions for improvement concerning the Whistleblower System can also be addressed to the Investigation Office.