



Conflict Minerals

General Information:

Section:	09 – Commercial Practices	Version:	1
Policy Number:	09 - 01	Effective Date:	June 1, 2013
Policy Contact:	Joyce Stuper	Reference Policies:	
Approved By:	Persio Lisboa		

Objective:

The U.S. Dodd-Frank Act required the Securities and Exchange Commission (“SEC”) to adopt rules to require certain SEC registrants to publically disclose their use of Conflict Minerals originating from the Democratic Republic of the Congo (“DRC”) or an adjoining country due to concerns about human rights abuses associated with the mining and sale of such minerals. These rules went into effect at the end of 2012 and require companies to report on their Conflict Mineral use annually starting in 2013. Navistar is committed to complying with the requirements of the SEC rules.

Defined Terms:

The term “Conflict Minerals” means gold, columbite-tantalite (coltan), cassiterite, wolframite, or their derivatives (tantalum, tin, tungsten) originating from the DRC or its adjoining countries the sale of which is used to finance armed conflict or is otherwise associated with human rights abuses.

The term “OECD” means the Organization for Economic and Cooperation and Development.

Policy Statements:

Navistar is subject to and must comply with the SEC's Conflict Mineral rules. As part of its compliance efforts, Navistar will develop a Conflict Minerals compliance plan to ensure compliance with the SEC Conflict Minerals rule and will work to establish a due diligence process in alignment with the OECD-recommended guidance.

Navistar will also evaluate our suppliers and products in order to understand which of our suppliers and products may use Conflict Minerals and will ask our suppliers to support our Conflict Minerals Compliance efforts.

Navistar will develop new terms and conditions for our suppliers which will incorporate Conflict Minerals disclosure requirements.

Should Navistar become aware of a supplier whose supply chain includes metals from the DRC or its adjacent countries, Navistar will engage in an additional risk assessment in an attempt to determine whether such metals might reasonably be expected to include Conflict Minerals.

Should the results of Navistar's additional due diligence assessment indicate a likelihood that minerals in its supply chain are Conflict Minerals, Navistar will take the appropriate actions to remedy the situation in a timely manner, including potential reassessment of supplier relationships.

Navistar may periodically update this Conflict Minerals Policy, as more data is gathered and as the SEC provides further definitions/clarity about the Conflict Minerals rule.

Roles and Responsibilities:

Employees are responsible for reading, understanding, and complying with the statements in this policy. For additional information related to Navistar's Conflict Minerals compliance program, please send questions to conflict.minerals@navistar.com.

The Procurement Group is responsible for working with other stakeholders within the company including the Legal, Compliance, Finance and Internal Audit Departments to develop appropriate processes and procedures and procedures to ensure compliance with this Policy.

Revisions and Approvals:

Date	Version	Approver	Change Description
6/1/13	V1	Persio Lisboa	Creation

Appendices and Attachments: