

Company 	INTERNATIONAL TRADE POLICY	
Function Global Compliance	Effective Date February 2021	Pages 5

Scope: This Policy applies to CNH Industrial N.V. and its subsidiaries (collectively, “CNH Industrial” or the “Company”) and the directors, officers and employees of such entities as well as those acting for or on behalf of such entities (collectively, “Covered Persons”).

Purpose: The Company takes pride in its position as a world leader in the production, sale and distribution of agricultural and construction equipment, trucks and commercial vehicles, and engines and powertrains. CNH Industrial is committed to working with all applicable regulatory agencies to ensure compliance with all applicable international trade laws (including import and export laws and regulations). This commitment extends from senior management to all CNH Industrial employees involved in international transactions involving our goods and company information. In furtherance of this commitment, the Company has established an international trade compliance program which sets forth the Company’s policies and procedures associated with international transactions involving CNH Industrial goods and company information. The program includes, among other things, regional compliance manuals as well as training for applicable employees.

Policy:

1. **Compliance with Applicable Laws:** It is CNH Industrial’s policy to comply with all applicable international trade laws and regulations (including import and export control laws, anti-boycott, anti-dumping and anti-corruption laws, and sanction programs). This Policy sets forth requirements for proper international trade activities, including export and import of goods, software, or technology. Many laws and regulations directly or indirectly impact international trade activities. Covered Persons are expected to consult with the Company’s international trade experts and/or the Company’s Legal and Compliance Department to determine which laws may apply to a particular transaction and how to comply with such laws.

2. Export Control Laws: It is critical to ensure CNH Industrial's global supply chain is not interrupted. In the United States ("U.S."), there are laws governing, and in many cases restricting the final destination of sale and/or shipment of goods, software, and technology to ensure certain individuals, businesses, or entities, including individuals and organizations associated with known terrorist activities or groups, do not receive items made by or from a U.S. company. The U.S. Bureau of Industry and Security ("BIS") is responsible for managing the flow and sale of U.S. software, goods, and technology from the U.S. Violations of U.S. (and comparable) export control laws can result in civil and criminal penalties for both CNH Industrial and individual Covered Persons as well as suspension or denial of export privileges and debarment from U.S. Government procurements. Countries or regions other than the U.S. (such as the European Union) also have export control restrictions, and all Covered Persons are required to follow the export laws in effect for the country and/or region in which they operate.
3. Import Control Laws: Most countries regulate the flow of goods, technology and persons into their borders. In the U.S., for example, Customs and Border Protection ("CBP"), a division of the U.S. Department of Homeland Security, secures and facilitates trade and travel into the U.S. Many of the regulations enforced by CBP are intended to prevent acts of terrorism, prevent the development or deployment of weapons of mass destruction, assure goods entering the U.S. are legitimate and that appropriate duties and fees are paid. Wherever CNH Industrial operates, all Covered Persons are required to follow all applicable import control laws. Violations of import control laws can result in detention or seizure of goods as well as civil and criminal penalties for CNH Industrial and for individual Covered Persons.
4. General Guidelines for Compliance with Export and Import Laws: Outside of the U.S., Covered Persons must consult the Company's international trade compliance experts in their region or the Legal and Compliance Department for guidance on export and import compliance. In the U.S., it is the Company's policy that:
 - (a) Covered Persons must comply with export and import control requirements when engaging in any of the following activities (which is a non-exhaustive list):
 - 1) Creation of international shipping documentation such as a Customs/Commercial invoice, Certificate/Statement of Origin or FedEx/UPS package label;

- 2) International shipment of goods, whether to third parties or between CNH Industrial locations;
 - 3) Shipment or movement of goods outside of the U.S. that are made in the U.S., made from components that originate in the U.S., or use U.S. technology in their construction;
 - 4) Transfer of goods or technology outside of the U.S. either verbally, in written form, or hand carried across borders. This includes training on specific methods and/or technologies and blueprints; and
 - 5) "Deemed export" and/or "deemed re-export" of controlled technology to foreign nationals of certain countries specified by the U.S. "Deemed exports" occur when technology is released within the U.S. to foreign nationals, and "deemed re-exports" occur when technology is released to foreign nationals who are located outside the U.S. For purposes of this Policy, technology is "released" when it is exchanged verbally, in written or electronic format, or made available for visual inspection or through practice or application by persons with knowledge of the technology.
- (b) Covered Persons are required to follow all procedures CNH Industrial has established to ensure export and import compliance, which include (but are not limited to):
- 1) Providing accurate and complete information on imported goods and exported goods where such information is required;
 - 2) Valuing goods in alignment with applicable regulations;
 - 3) Marking goods with the appropriate country of origin where required to provide such information; and
 - 4) Maintaining shipping documents in accordance with Company policy and applicable regulations.
- (c) Covered Persons should contact the Company's international trade compliance experts in their region or the Legal and Compliance Department if they have any questions about international transfer of goods, software, or technology.

5. Basic Shipping Procedures: Because of the complexity of export and import control laws, CNH Industrial's international trade compliance experts have established procedures to help ensure shipping and other export/import activities are performed in a compliant manner. Covered Persons are required to follow these procedures. Covered Persons are responsible for determining which procedure applies to a particular shipment or commodity.
- (a) One such procedure requires all international export activity be shipped via an approved shipping location for final processing.
 - (b) All goods shipped to the United States must be accompanied by documentation to meet customs and other government agencies' rules and regulations. Consult with the international trade experts in your region to review all documentation before the goods are shipped.
 - (c) Do not ship any hazardous materials (e.g. "wet" batteries or engines with any type of fluids present in the engine) without first consulting with the environmental health and safety and international trade experts in your region.
6. Additional Information: Every Covered Person worldwide is required to follow: (a) the CNH Industrial Code of Conduct, (b) laws and regulations applicable in the relevant jurisdictions, and (c) CNH Industrial governance documents applicable to him or her, including without limitation, those relating to this Policy. Covered Persons should conduct appropriate due diligence to prevent violations of all laws, regulations, and governance documents. Covered Persons must refer to the governance documents in effect for the geographic area in which they work, or for which they are responsible, or request guidance from their manager or compliance representative with responsibility for that geographic area. The term "governance documents" in this Policy means CNH Industrial's written policies, standards, procedures, business practices, and manuals.

The Company expects its managers to: (a) be familiar with (or take appropriate steps to become familiar with) the laws, regulations, and CNH Industrial governance documents applicable to the activities they manage or supervise, (b) provide their direct reports with appropriate training about compliance issues relevant to the performance of their job functions, and (c) supervise their direct reports with specific emphasis on compliance requirements and activities.

If the Company determines that any Covered Person has violated this Policy, related standards, procedures or controls, applicable laws or regulations, or any governance documents, appropriate disciplinary measures will be taken,

up to and including immediate termination of employment to the extent permitted by applicable laws.

Subject to applicable laws, CNH Industrial reserves the right to take whatever disciplinary or other measure(s) it determines in its sole discretion to be appropriate in any particular situation, including disclosure of the wrongdoing to governmental authorities. CNH Industrial may also terminate the services or work engagement of non-employee Covered Persons for violation of this Policy.