**Navistar, Inc.**

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**Jeanette Wells**

Director, Finance Purchasing & Logistics

Navistar Gift and Entertainment Policy

Throughout the year, Navistar and its supply base work together to create a mutually beneficial business relationship. It is important to Navistar that these relationships are built on ethical business conduct. As we move forward into the holiday season, I want to take this opportunity to remind everyone of Navistar’s gift policy. Navistar’s Gift and Entertainment Policy 05-10 is in place to ensure that the relationship between Navistar and our suppliers remains professional and at arm’s length.

Per Policy 05-10 Navistar prohibits its employees from accepting the following from its suppliers:

* Cash, gift cards, or loans in any amount
* Gifts that have a cumulative value of $100 or more
* Transportation, travel expenses, or accommodations for trips that are not business related
* Donations for parties, including going away parties
* Personal discounts that are not available to all Navistar employees or to the general public
* Sponsorship for recreational activities such as golf, softball, or bowling leagues
* Excessive or inappropriate meals or entertainment
* Alcohol for consumption on Navistar premises
* Any form of entertainment where the supplier is not present and there is not a legitimate business purpose for the event, except when given as a nominal gift (refer to the second point above)
* Offers made in exchange for Navistar’s commitment

In addition, Navistar employees should not expect or solicit gifts from suppliers. If you decide to give a nominal gift to a Navistar employee, please deliver it to the employees work location and avoid sending the gift or holiday cards to employee’s home. If you are aware of a situation that may not be in the spirit of Navistar’s gift policy (even if it was inadvertent) or you would like to request an exception (all exception requests must be approved by the Chief Executive Officer) please contact me at (331) 332-3066 or Compliance Advice Helpline at (331) 332-2500

Thank you for your support and please accept my best wishes for a happy holiday season.

Sincerely,

Jeanette Wells

CC:

Dave McKean, Vice President Procurement

Josef Kory, Vice President Supply Chain

Darcy Morowitz, Vice President Internal Audit and Chief Compliance Officer