

<p style="text-align: center;">Company</p> 	<p>HUMAN RIGHTS POLICY</p>	
<p style="text-align: center;">Function</p> <p>Human Resources Global Compliance</p>	<p>Effective Date</p> <p>April 2021</p>	<p>Pages</p> <p>5</p>

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 including all parties the Company conducts business with including, but not limited to, suppliers, service providers, sales representatives, agents, consultants, dealers, distributors, importers, resellers, and joint venture partners (collectively, “Covered Persons”).

Purpose: The Company is committed to the creation of long-term sustainable value for all its stakeholders and believes respect of fundamental human rights is a prerequisite for achieving such results. CNH Industrial endorses the spirit and intent of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Companies and the relevant Declaration on Fundamental Principles and Rights at Work of the International Labor Organization and is committed to continuing to integrate such spirit and intent in its operations, organizational culture, and its relations with stakeholders.

This Policy also outlines the commitment of CNH Industrial to prevent human trafficking and slavery in its supply chain, in compliance with the California Transparency in Supply Chains Act, the Human Trafficking Prevention Act, the UK Modern Slavery Act 2015, and similar laws.

CNH Industrial considers training its employees on Human Rights fundamental to the ongoing efficacy of this Policy.

Policy: The Company’s global presence requires that it adopt generally accepted principles in each geographic area where CNH Industrial operates. The Company is therefore committed to respecting fundamental human rights and basic working conditions in all its operations and requires all Covered Persons to do the same. This

Policy identifies principles with which all Covered Persons must comply in carrying out their business for or on behalf of CNH Industrial.

1. No child labor

CNH Industrial does not employ child labor, namely it does not employ people younger than the permissible age for working established in the legislation of the place in which the work is carried out and, in any case, younger than fifteen, unless an exception is expressly provided by international conventions and by local legislation. The Company is also committed to not establishing or maintaining working relationships with Covered Persons that employ child labor, as defined above.

(ref. ILO convention no. 138)

2. No forced labor, human trafficking, or any form of slavery

CNH Industrial does not tolerate the use of forced or mandatory labor, slavery, human trafficking or sex trafficking by any Covered Person.

Human trafficking is the arrangement or facilitation of the travel of another person with a view to that person being exploited. It is irrelevant whether such person consents to the travel.

(ref. ILO conventions no. 29 and 105 and ref. to UN convention against Transnational Organized Crime)

3. Working Conditions

CNH Industrial ensures that all workers receive at least the legally mandated minimum wages and benefits. Working conditions, working time and compensation must be fair, complying with the laws, standards and practices applicable in those countries where CNH Industrial operates. To this end, the Company ensures that overtime work is required and remunerated according to the law and the local customs, collective labor agreements or industry standard. In addition, the Company's fixed-term hiring is aimed at responding to a temporary need for personnel during peak times and for other purposes within the limits set by the local legislation.

4. No harassment

Harassment can take many forms; however, all forms of harassment are considered cruel, inhumane or degrading. CNH Industrial prohibits and does not tolerate any type of harassment. By way of example, racial or sexual harassment or harassment related to other personal characteristics which has the purpose or the effect of creating a hostile work environment, violating the dignity of the person who is the victim of such harassment, or demanding any kind of sexual favor in exchange for a workplace

advantage (for example a raise or to avoid being fired) is totally unacceptable to the Company whether it takes place inside or outside the workplace.

5. No discrimination

CNH Industrial does not accept discrimination against employees in any manner on the basis of: ethnicity, race, gender, sexual orientation, personal or social status, health, physical condition, disability, age, nationality, religious or personal beliefs, political opinion, or other protected status. The Company recruits and hires employees on the basis of their experience, knowledge, and skills and is committed to providing equal opportunities to all employees, both on the job and in their career advancement.

(ref. ILO Convention no. 111)

The head of Human Resources for each segment/function, in collaboration with all personnel managers, shall ensure that in every aspect of the employment relationship, such as recruitment, training, compensation, promotion, transfer and termination, employees are treated according to their abilities to meet job requirements and all decisions are free from any form of discrimination.

6. No retaliation

Retaliating in any way against someone for reporting in good faith a violation of this or any other Company Policy, our Code of Conduct, applicable law, or participating in an investigation of a report is forbidden. Any instance of retaliation may result in discipline up to and including termination of employment.

7. Freedom of association

Employees are free to choose to join (or not join) a trade union in accordance with local law and the rules of the various trade union organizations. CNH Industrial recognizes and respects the right of employees to be represented by trade unions or other representatives established in accordance with locally applicable legislation and practice, including the right of collective bargaining. When engaging in negotiations with such representatives, the Company seeks a constructive approach and relationship.

(ref. ILO Convention no. 87 and 98)

8. Occupational health and safety

CNH Industrial is committed to protecting and promoting the health and safety of its employees and customers and complies with all applicable laws and regulations governing employee health and safety.

(ref. ILO Convention no. 155)

9. Security

CNH Industrial is committed to ensuring that security personnel protecting Company assets act in compliance with applicable law and regulations.

10. Business Partners, Suppliers and other Covered Persons

CNH Industrial requires its suppliers, business partners, and all Covered Persons to comply with the principles outlined in this Policy (or similar commitment) when performing their business activities, as a basis for long-term relations with CNH Industrial. In particular, the Company does not establish working relationships with Covered Persons that employ mandatory, forced or child labor, or that engage in, facilitate, or promote human trafficking and generally, that do not meet the requirements set forth in this Policy.

11. Local Communities

CNH Industrial is aware that its decisions can have significant impacts, direct and indirect, on the local communities in which it operates. CNH Industrial pays special attention to the most vulnerable communities, such as tribal and indigenous people, and to the respect of their right to a healthy environment, their property and land rights, their right to an adequate standard of living and their access to natural resources (see ILO Convention no. 169). Accordingly, the Company shall take all reasonable steps to inform those communities of relevant actions and projects and shall promote an open dialogue to ensure that their legitimate expectations are taken into consideration. Moreover, CNH Industrial seeks to contribute to the social, economic, and institutional development of local communities through specific programs. Covered Persons are asked to behave in a socially responsible manner by respecting the cultures and traditions of each country in which the Company operates and acting with integrity and good faith in order to merit the trust of the community.

12. Privacy

CNH Industrial intends to protect values such as confidentiality and personal data protection rights, in compliance with applicable laws.

Governance: While ensuring human rights is the responsibility of all Covered Persons, executive oversight and responsibility for the implementation of this Policy rests with our Senior Leadership Team. CNH Industrial's Board of Directors oversees the implementation of this Policy at the board level and is responsible for ensuring adherence to these commitments. Company managers are responsible for overseeing the implementation of this Policy on a local level.

Monitoring and implementation: CNH Industrial monitors respect for human rights within the Company's operations through specific actions, assesses their potential impact on human rights, and implements mitigating and preventative actions where needed.

CNH Industrial has implemented the Compliance Helpline as a means for CNH Industrial employees, customers, suppliers, and other third parties to report potential violations of applicable laws, Company policies or the Code of Conduct. Matters may be submitted to the Compliance Helpline on an anonymous basis (to the extent legally permitted). The Company has an Anti-Retaliation Policy that prohibits retaliation of any kind with respect to a person who submits a matter, in good faith, to the Compliance Helpline or who participates in an investigation. In addition, training activities are conducted on specific human rights issues.

This Policy shall be disseminated among all employees, through dedicated training sessions and otherwise, and is made available on the CNH Industrial website to all stakeholders, including suppliers and other business partners. In addition, the Company works broadly to promote respect for human rights through public policy, stakeholder dialogue, advocacy, collaborations, and participation in various forums.

Additional Information: This Policy supplements the information contained in our Code of Conduct and our corporate policies including:

- CNH Industrial's Health and Safety Policy
- CNH Industrial's Data Privacy Policy
- CNH Industrial Community Investment Policy
- CNH Industrial's Supplier Code of Conduct
- CNH Industrial's Anti-Retaliation Policy