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Responsible Sourcing Guidelines

Scope: These Responsible Sourcing Guidelines (the “**Guidelines**”) apply to CNH Industrial N.V., its subsidiaries (collectively, “**CNH**” or the “**Company**”), and the directors, officers and employees of CNH, as well as CNH’s suppliers and others when they are acting for or on behalf of CNH.

Purpose: These Guidelines assign responsibilities and establish procedures designed to ensure full compliance with Conflict Minerals Regulation (as defined below) and the EU Regulation 2023/1542 concerning batteries and waste batteries (“**EUBR**”).

GUIDELINES

1. Background

CNH is committed to make sure that raw materials (“**Raw Materials**”), including 3TG and Battery Materials (as defined below) and other minerals used in CNH’s products are sourced in a responsible way and do not contribute to armed conflict, human rights abuses or environmental degradation and loss of biodiversity. CNH expects all its suppliers to share this commitment.

a) Conflict Minerals

CNH is committed to conflict-free sourcing of tin, tantalum, tungsten and gold (“**3TG**”) and other minerals, which have been identified as potential conflict minerals in the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “**Conflict Minerals Regulation**”).

Armed groups operating in the Democratic Republic of Congo and surrounding region control many of the region’s mines or transit routes and have engaged in armed conflict, as well as inhumane treatment of local populations. Concern that proceeds from the mining of minerals have been used to fund violence in those regions led the United States to enact laws requiring many companies to report publicly on their use of “conflict minerals” in the products they manufacture.

Conflict Minerals Regulation requires companies to conduct an inquiry into the existence and origin of 3TG in their supply chains. If these minerals come from the Democratic Republic of Congo or the surrounding region or if their country of origin is uncertain, then companies will have to conduct a more thorough review of their supply chain in an attempt to determine whether such minerals used by the manufacturer support armed groups in the Democratic Republic of Congo or the surrounding region.

These Guidelines are not intended to ban procurement of 3TG or other products from the Democratic Republic of Congo or the surrounding region, but to promote sourcing from responsible sources in those regions.

b) Battery raw materials



CNH is committed to adhere to the requirements provided by the EUBR, and to ensure that its management systems are aligned with recognized international due diligence standards.

Battery raw materials ("**Battery Materials**") that are in scope of the EUBR are:

- a) Cobalt
- b) Natural Graphite
- c) Lithium
- d) Nickel
- e) Chemical compounds derived from these raw materials.

2. Compliance with laws, regulations and international standards

CNH's approach to responsible sourcing is aligned with internationally recognized standards and instruments, including the standards provided by the EUBR and Conflict Mineral Regulation.

3. Due Diligence Management System for Raw Materials Supply Chain

CNH's products are highly complex, typically containing thousands of parts that come from many different direct suppliers within the Company's vast global supply network. This means that the Company must rely on its direct suppliers to work with their upstream supply chain to detect the presence and evaluate the origin of any Raw Materials contained in components or materials it purchases.

a) Control systems

CNH is a member of the Responsible Minerals Initiative ("RMI"), which is committed to maintaining sustainable due diligence along the supply chains for Raw Materials that are critical regarding human rights and environmental risks, and which includes the Responsible Minerals Assurance Process ("RMAP"), which identifies smelters and refiners that source minerals in conformance with the rules of RMAP.

CNH conducts an inquiry of its suppliers to determine the country of origin of the components it purchases, including identification of relevant suppliers and a survey of those suppliers. Following a risk-based approach, CNH requires its major direct suppliers as well as direct suppliers that CNH believes are likely to provide it with components containing Raw Materials to research the existence and origins of Raw Materials in their own supply chain and provide written evidence of this.

All surveyed suppliers must provide information regarding Raw Materials and smelters, using the "Conflict Minerals Reporting Template" (CMRT) and the "Extended Minerals Reporting Template" (EMRT) developed by the Responsible Minerals Initiative (RMI). With the CMRTs and EMRTs, suppliers identify the smelters and refineries of these Raw Materials in their supply chain in the best possible way.

On a yearly basis, CNH monitors the information provided by its surveyed suppliers and assesses the conformity of the listed smelters and refineries with the RMAP standard or other OECD-aligned assessments.

CNH uses software to collect, manage, analyze and aggregate supplier CMRT and/or EMRT data for reporting purposes and follow up with suppliers whose CMRT and/or EMRT data is incomplete or inconsistent, or who lists non-compliant or uncertified smelters or refiners.



b) Internal Team

The due diligence management system for Raw Materials supply chain and its procedures are overseen by a cross-functional executive steering committee (the "Steering Committee") sponsored by senior legal and compliance staff, and a team of subject matter experts from functions such as purchasing, sustainability and research and development. The next level of the management system is a team of subject matter experts from relevant functions within the Company, including procurement, quality, product safety, internal audit, and legal. This team is responsible for implementing the Company's due diligence procedures.

c) Suppliers' engagement

[CNH's suppliers are required to comply with the principles included in CNH's Suppliers Code of Conduct (and in these Guidelines), as well as with all applicable laws and regulations and to provide CNH with supporting information and documentation evidencing due diligence of Raw Materials in their respective supply chains.]

Suppliers are provided with instructions for responding to the CMRT and the EMRT.

Violation or lack of cooperation may lead to claims, loss of business and ultimately the end of the business relationship with CNH.

CNH's suppliers are also required to assist the Company to comply with the requirements of Conflict Minerals Regulations, and the rules of the U.S. Securities and Exchange Commission.

4. Chain of Custody

CNH strives for full transparency in its supply chain down to the level of the mine and conduct due diligence at every step. CNH's responsible sourcing framework is risk-based and follows OECD Due Diligence Guidelines.

To verify the chain of custody of the Raw Materials, CNH's assessments of suppliers evaluate both traceability and due diligence processes. Upon request suppliers have to disclose their supply chain up to the material origin (including smelters and refiners) and provide evidence of management systems or third-party verifications demonstrating processes that prevent or mitigate sustainability risks in the supply chain.

In particular, CNH requires its surveyed suppliers to declare the following information:

- 1) a description of the Raw Material, including its trade name and type;
- 2) the name and address of the supplier;
- 3) The country of origin, the related smelters/refiners of the raw materials.

As regards Battery Materials, CNH requires its surveyed suppliers to declare the information required by EUBR.

CNH selects its suppliers based on their alignment with CNH targets and principles and it is committed to make all reasonable efforts to eliminate procurement, as soon as commercially practicable, of products containing Raw Materials obtained from sources that contribute to armed conflict, human rights abuses or environmental degradation and loss of biodiversity.

5. Risk Management



CNH has a well-established environmental, social and governance (“**ESG**”) risk assessment process for its current suppliers to identify ESG risks and any risk that Raw Materials could originate from a conflict affected and high-risk area (CAHRA). The results are continuously monitored to ensure alignment with the Supplier Code of Conduct and these Guidelines.

In high-risk countries, CNH may supplement its evaluations with third-party audits to assess compliance with its standards.

6. Grievance Mechanism

Concerns and violations of these Guidelines, including serious risks and violations of human rights and environment by direct and indirect suppliers can be reported to CNH using CNH’s Compliance Helpline, through which any person may make an anonymous report of any ethical or compliance concern.

The cases are handled according to CNH’s Speak-up and non-retaliation Policy.

If violations are identified, measures are initiated immediately. CNH might suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation and reserve the right to terminate ongoing business relationships.

CNH’s Compliance Helpline is available 24 hours a day, 7 days a week and 365 days a year. You can go to www.cnhcompliancehelpline.com and see a list of country-specific phone numbers.

Specific questions regarding CNH’s Conflict Minerals Policy and program can be addressed to **conflictmineralsreporting@cnhind.com**.

7. Maintenance of documents and records

To the extent required by EUBR and Conflict Minerals Regulation, CNH shall maintain records demonstrating compliance with due diligence obligations, including the chain of custody of Raw Materials for at least 10 years.

8. Carry out Third Party Audit

CNH supports audits of Raw Materials smelters and refiners conducted by third parties through CNH’s membership in RMI.

In addition, to the extent required by EUBR and/or Conflict Minerals Regulation, CNH:

- a) shall engage an independent third-party auditor to verify and periodically audit these Guidelines, CNH’s internal due diligence systems and its suppliers’ practices to verify compliance with the due diligence obligations under the EUBR; and
- b) shall render audit results publicly available and maintained for at least 10 years.

9. Ongoing report on battery supply chain due diligence/Communication and reporting

CNH publicly discloses information regarding its approach to responsible sourcing and sustainability supply chain management on the Company’s website, in its annual Sustainability Report and in its Human Rights Statement. The annual Sustainability Report provides more details on CNH’s due diligence efforts in specific risk areas, including efforts related to 3TG and Battery Materials.



Referred regulations:

[Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.pdf](#)

[EU Regulation 2023 1542.pdf](#)