

# Global Code of Conduct



Driven by Integrity.

**PACCAR** Inc



## Table of Contents

<b>A Message from the Chief Executive Officer.....</b>	<b>1</b>
<b>I. Fundamental Elements of the Code of Conduct.....</b>	<b>2</b>
A. Purpose .....	2
B. Scope .....	3
C. Application .....	3
D. Guidance for Questionable Situations.....	4
E. Responsibilities of PACCAR Managers.....	4
F. Duty to Report Potential Violations .....	5
G. Non-Retaliation .....	6
H. Abiding by the Code of Conduct .....	6
<b>II. Commitment to Integrity.....</b>	<b>7</b>
A. Maintaining a Respectful Work Environment.....	7
1. Harassment-Free Workplace .....	7
2. Dedication to Diversity and Inclusion.....	8
3. Appropriate Workplace Behavior .....	9
4. Anti-Violence.....	9
B. Commitment to Human Rights .....	10
C. Environment, Health and Safety.....	11
<b>III. Honest and Ethical Business Practices.....</b>	<b>12</b>
A. Antitrust and Fair Competition .....	12
B. Anti-Bribery and Corruption.....	13
C. Anti-Money Laundering .....	14
D. Business Hospitality - Gifts, Entertainment and Travel.....	14
E. Conflicts of Interest .....	15
F. Charitable and Political Contributions.....	15

<b>IV. Financial Integrity</b> .....	<b>16</b>
A. Accurate Financial Results .....	16
B. Disclosure Requirements .....	16
C. Use of Company Assets .....	17
D. Retaining Proper Business Records .....	17
<b>V. Interaction with PACCAR Partners</b> .....	<b>18</b>
A. Customer Interaction and Information .....	18
B. Dealers, Suppliers and Other Partners .....	19
C. Government Business and Contracting .....	19
<b>VI. Global Trade Compliance</b> .....	<b>20</b>
A. Import and Export .....	20
B. Trade Sanctions and Embargoes .....	21
C. Economic Boycotts .....	21
<b>VII. Responsibility to Investors and Shareholders</b> .....	<b>22</b>
A. Confidential Information .....	22
B. Protecting Company Assets .....	22
C. Audits and Investigations .....	23
D. Intellectual Property .....	23
E. Cybersecurity and Electronic Communication .....	24
F. Inside Information .....	25
G. Privacy .....	25
H. Interactions with the Media, Investors and the Public .....	26
I. Use of Social Media .....	26
<b>VIII. PACCAR Resources</b> .....	<b>27</b>
A. Reporting Concerns .....	27
B. EthicsLine Reporting System .....	27

# A Message from the Chief Executive Officer

PACCAR operates with the highest integrity and the manner in which PACCAR conducts its business is very important to the continued success of PACCAR. Over the years PACCAR has earned a reputation for integrity, adhering to the law and maintaining the highest level of ethical conduct. The Code of Conduct provides guidance for our day-to-day activities.



PACCAR's Standard Policy 10, Statement of Company Principles, states:

PACCAR conducts business so as to reflect the highest ethical standards, fulfill our legal obligations, and meet our social responsibilities. We strive to gain the favorable regard of employees, customers, shareholders, governments, and the general public through superior performance and effective communications.

The purpose of this Code of Conduct is to comply with the law and heighten awareness of the ethical aspects of our business so that we continue to uphold the principles of Standard Policy 10 in our daily decision-making. Each director, officer and employee of PACCAR has the responsibility to review the Code of Conduct and become familiar with how the Code applies to specific business situations. Every individual business action taken has an impact on PACCAR's excellent reputation.

I encourage you to read the Code of Conduct and understand how its principles and guidelines apply to your job. Please use it as a framework for acting honestly and ethically. You will never be penalized for asking questions or reporting concerns. At PACCAR, we are proud of our open door, non-retaliatory culture, and we welcome questions and encourage dialogue. Remember, we all play a role in PACCAR's success. Thank you for your commitment to conducting business ethically and responsibly.

A handwritten signature in black ink that reads "Preston Feight". The signature is written in a cursive, flowing style.

Preston Feight  
Chief Executive Officer



## I. Fundamental Elements of the Code of Conduct

### A. Purpose

PACCAR’s success starts with its core principles: integrity, quality, safety, and is based on a long-standing commitment to operational excellence and responsibility to the Company’s customers and the communities the Company serves. PACCAR’s strength derives from the Company’s focus on quality and its well-earned reputation for honesty and ethical conduct. Everyone at PACCAR embodies these values by the way they act as individual directors, officers and employees, and as citizens in the community. Each employee is required to follow the Code of Conduct on the job and while engaged in outside activities that may affect or reflect on the Company. The Code of Conduct (“Code”) is based on PACCAR’s principles and illustrates how they apply to your day-to-day decisions and actions.

When does the Code of Conduct apply to my behavior at PACCAR?

*The Code of Conduct applies to all potential ethical dilemmas and business circumstances.*

## B. Scope

The Code of Conduct applies to PACCAR and all of its global subsidiaries and affiliates. Whenever the Code refers to ‘PACCAR’ or the ‘Company’ in this Code of Conduct, it includes these entities. The Code of Conduct applies to all of PACCAR’s directors, officers, employees (both full-time and part-time), representatives and contractors. In addition, PACCAR expects dealers, suppliers, customers, and other business partners to act ethically and in a manner consistent with the Code of Conduct. Wherever PACCAR does business, each of us is responsible for following the Code of Conduct, as well as applicable laws, regulations and Company policies, such as PACCAR’s Standard Policy Bulletins (“SPs”).

PACCAR’s global operations are subject to the laws, rules and regulations of multiple jurisdictions, including countries, states, provinces and municipalities. Because PACCAR is incorporated and headquartered in the U.S., the Code is based primarily upon U.S. law, which can be applicable to transactions occurring outside of U.S. borders. The principles expressed in the Code reflect the laws of many of the jurisdictions in which PACCAR transacts business. Where there is a potential conflict between the laws of two or more jurisdictions, contact the Legal Department for assistance in determining what law applies.

## C. Application

The Code of Conduct should be used as a resource when legal or ethics questions arise on the job. The Code is not a comprehensive manual and will not provide details for all possible scenarios, but it is a statement of how PACCAR commits to conduct business. Every member of the PACCAR community must exercise sound judgment in matters involving business ethics and integrity. PACCAR employees are expected to avoid conduct that may appear questionable on ethical grounds or could be a potential violation of Company policies. If you find yourself in a difficult situation and are not sure how to proceed, first ask yourself whether your behavior is consistent with the law, the Code of Conduct, and other PACCAR policies. The Code also links to informative policies and documents.

## D. Guidance for Questionable Situations

At PACCAR, all employees are encouraged to raise concerns and seek guidance. In many cases, your direct manager or supervisor may be your best resource to answer questions or address concerns. If you are not comfortable raising an issue with your manager, please contact another PACCAR manager, a Human Resources representative, or speak with a Legal Department attorney. You may also submit a report through PACCAR's independent third party helpline administrator, [EthicsLine Reporting System](#), through either an online reporting resource or phone lines available in all of PACCAR's operating countries. The Legal Department has oversight of the handling and integrity of investigations into all reports submitted through EthicsLine. Information about EthicsLine is available at end of the Code (see Section VIII.B).

## E. Responsibilities of PACCAR Managers

PACCAR leaders and managers have additional responsibilities to both PACCAR and other employees at the Company. An important part of a leader's responsibility is to exemplify the Company's corporate principles and exhibit the highest standards of integrity. Leaders must communicate the seriousness of the Company's expectations for ethical conduct and their own personal support of these expectations by holding their employees accountable for making sound ethical judgments. Managers and supervisors should provide responsible guidance to their employees, ensuring they know and follow applicable policies, laws and regulations.

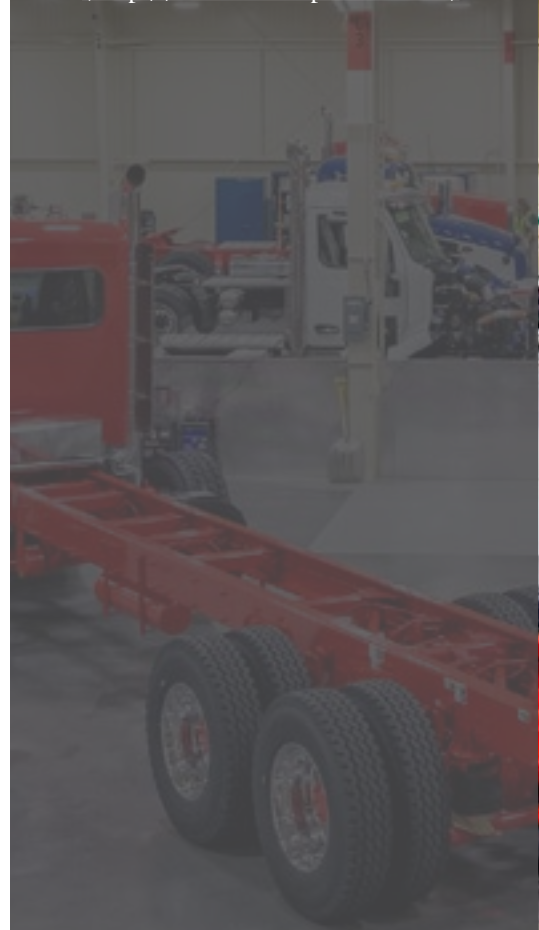
The Company's senior financial officers (the chief executive officer, the principal financial officer and the principal accounting officer) are also required to comply with the Company's Code of Ethics for Senior Financial Officers, a copy of which is posted on the Company's public website.

## Ethics Essentials for Managers

Did you know that employees are most likely to bring concerns directly to their managers? Be receptive and open to employee concerns.

*If an employee raises potential ethics issues or reports a violation of the Code of Conduct, other PACCAR policies, or potential violations of the law, it is your responsibility as a manager to refer the matter to any of the following resources:*

- Human Resources Department
- Legal Department
- [Compliance Office](#)  
([Compliance@paccar.com](mailto:Compliance@paccar.com))
- Internal Audit Department
- [EthicsLine Reporting System](#)  
(<http://ethicsline.paccar.com>)





PACCAR will not retaliate or permit retaliation when someone in good faith has:

- Reported what he or she believes is a violation of our principles, the Code of Conduct, Company policies, or the law
- Raised a compliance question or sought advice about a particular business practice, decision or action (or assisted another person to do the same)
- Cooperated in an investigation of a potential violation

### Primary PACCAR Resources

To make a report or ask a question, please contact one of the following Company resources:

- Your manager
- A Human Resources representative
- General Counsel or another member of the Legal Department or [Compliance Office](#)
- Internal Audit Department
- Our [EthicsLine](#) Helpline at: EthicsLine Reporting System <http://ethicsline.paccar.com> 1-800-300-1826  
From outside the U.S.: Country-specific toll-free phone numbers listed in the PACCAR Resources at the end of the Code of Conduct (Section VIII.B).



### F. Duty to Report Potential Violations

All PACCAR employees are responsible for notifying the Company of wrongdoing. Any employee who is aware of a violation, or even suspects any violation of the Code of Conduct, other PACCAR policies, or the law, must report it. Failing to report wrongdoing is a breach of the Code of Conduct and may be cause for disciplinary action, up to and including termination of employment, subject to applicable law. PACCAR will fully support employees who make honest, good-faith reports of potential wrongdoing.

You may use any of the provided PACCAR resources to ask questions or to report possible violations of the Code. If you think that one suggested method would be uncomfortable or inappropriate, choose the method that you believe is most suitable. If you want to remain anonymous, you may submit a report using the toll-free EthicsLine phone-lines or [web-portal](#), which is managed by an independent third party vendor. The important step is for you to speak up if you are aware of a violation or suspect a violation has occurred.



### G. Non-Retaliation

PACCAR is committed to protecting the rights of those individuals who report issues in good faith. PACCAR will not tolerate retaliation against an employee who either reports a violation or suspected violation in good faith or cooperates in an investigation. Like failing to report wrongdoing, retaliation is a breach of the Code of Conduct and cause for disciplinary action, up to and including termination of employment or service, in accordance with local law. If you know or suspect that retaliation has occurred or is occurring, you must report it immediately.

### H. Abiding by the Code of Conduct

Employees may be requested from time to time to certify that they have reviewed and understand PACCAR's Code of Conduct, will comply with its standards, and are not personally aware of any violations of the Code by others. This certification is the employee's pledge and an important part of PACCAR's commitment to abide by the Code and PACCAR's values and promptly raise concerns. Any waiver of the Code of Conduct involving a director or executive officer may only be made by the Board of Directors.

PACCAR will fully investigate any suspected violations, including those reported through [EthicsLine](#). You are expected to cooperate and provide complete, accurate and truthful information in connection with any investigation, subject to any applicable laws. The Company recognizes that there may be times when employees who report violations or suspected violations would like their reports or employee names to remain confidential, and the Company will attempt to keep those reports as confidential as possible under the circumstances, sharing relevant information only with those with a need to know.

PACCAR maintains a positive environment where employees are able to do their jobs without fear of harassment or discrimination and does not tolerate retaliation against employees who report any incidents in good faith.

## II. Commitment to Integrity

### A. Maintaining a Respectful Work Environment

#### 1. Harassment-Free Workplace

PACCAR's culture is one of dignity and respect. All PACCAR employees are responsible for ensuring that the workforce and work environment are free from inappropriate conduct. PACCAR prohibits any harassing behavior, such as:

- Sexual harassment
- Electronic harassment  
(for example, through email, social media or the Internet)
- Bullying
- Verbal abuse

Harassment includes any conduct that creates an intimidating, hostile, or offensive work environment on the basis of certain personal characteristics. You are responsible for reporting inappropriate behavior involving an employee or even someone who is not affiliated with PACCAR, such as a dealer, customer or supplier. Retaliation for making a complaint or for assisting the Company in the investigation of discrimination or harassment concerns is prohibited. Report the offending behavior to your manager or another member of your management, the Human Resources Department, the Legal Department, or contact [EthicsLine](#). For more information, consult [SP23 Workplace Harassment](#) or your local harassment prevention policy.



## 2. Dedication to Diversity and Inclusion

PACCAR is committed to building a diverse workforce made up of team members who bring a wide variety of skills, experiences and perspectives, and to the principles of equal employment opportunity, inclusion and respect. The Company’s commitment to diversity and inclusion is an important part of what it means to be a PACCAR employee. Directors, officers, and employees are expected to comply with all applicable employment laws.

The Company provides equal employment opportunities to all employees and job applicants and will not unlawfully discriminate on the basis of any protected status, in accordance with local law, such as:

- Age
- Citizenship
- Color
- Disability
- Ethnicity
- Gender
- Gender Identity or Expression
- Genetic Information
- Marital Status
- Medical Condition
- National Origin
- Pregnancy
- Race
- Religion
- Sex
- Sexual Orientation
- Veteran Status
- Other characteristics protected by law

Non-discriminatory treatment is important not only in the hiring process, but also in connection with other employment-related decisions, such as training, project assignments, rates of pay, transfers and promotions. Please see [SP2 Non-Discrimination Policy](#) and/or your applicable local policy for additional information on this topic.



If you suspect behavior that fails to meet the standards of PACCAR's Code, you should notify your manager or report it to the internal resources referenced in this Code.

### 3. Appropriate Workplace Behavior

All PACCAR employees are expected to act respectfully in the workplace. Appropriate workplace behavior includes being courteous and professional when representing PACCAR in all aspects of our work. PACCAR does not tolerate conduct that harasses, disrupts, or interferes with another person's work performance or that creates an intimidating, offensive, or hostile environment. You may not possess, use, distribute or be under the influence of illegal drugs on Company property or while working, including while on dealer, customer, supplier or other business partner premises. Similarly, substance abuse in the workplace, including the improper use of prescription drugs, is a violation of the Code of Conduct. The possession or use of alcohol while working or on Company property is prohibited unless approved by the Company and used responsibly. For more information on this topic, see the [SP84 Drug and Alcohol Abuse Policy](#) and/or your local policy.

### 4. Anti-Violence

PACCAR maintains a workplace free of intimidation, threats, or acts of violence and has a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. Such acts include verbal assaults, threats or any hostility, intimidation, or aggression. PACCAR does not tolerate any threats, direct or implied, or physical conduct by any person that results in harm to people or property. PACCAR also prohibit the possession of weapons in the workplace. PACCAR's zero-tolerance policy for workplace violence applies to behavior on company premises and to the behavior of our employees engaged in PACCAR business anywhere in the world outside of our premises. Contact any Company manager or local representative to report threatening conduct or potential violence immediately. For more information, please see [SP 17 Security Policy](#).



## B. Commitment to Human Rights

PACCAR is committed to upholding fundamental human rights and believe that everyone should be treated with dignity, fairness, and respect. PACCAR provides fair working conditions and respects human rights. PACCAR does not use or condone the use of slave, forced, or child labor, nor will PACCAR engage in or partner with, dealers, suppliers, or other third parties who engage in, human trafficking. PACCAR expects employees, dealers, other business partners, and suppliers to adhere to the highest standards of integrity and will only retain parties that demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws. PACCAR supports the fair treatment of individuals and safe working conditions and works to ensure PACCAR products are free of conflict minerals and slave or child labor.

PACCAR never compromises on quality and safety. PACCAR drives for excellence, safety, and integrity in everything it does. If you see something that you think may be unsafe, you should always speak up and raise your concern.

### C. Environment, Health and Safety

Our health and safety policies and procedures are designed to help all PACCAR community members work safely, whether at our facilities, on dealer, supplier or business partner sites, or while traveling for PACCAR. Safety is everyone's responsibility. You must follow all safety and health policies no matter your position at PACCAR. Each PACCAR employee is expected to maintain the highest standards and to put safety first - without exception. PACCAR strives at all times to produce premium products and its consistent performance as a high quality manufacturer is critically important to PACCAR's operations. Any known or suspected defect in a product must be reported immediately to the appropriate quality supervisor or relevant division product safety personnel.

Environmental responsibility is one of PACCAR's core principles. The company regularly develops new programs to help protect and preserve the environment. PACCAR is committed to compliance with all applicable environmental laws and emission regulations. Employees whose work affects environmental and regulatory compliance must be knowledgeable about the permits, laws, and regulations that apply to their work. PACCAR expects employees, dealers, suppliers, and other third parties to comply with such requirements. For more information, please see PACCAR's report [Environmental, Social, and Governance](#) on the PACCAR website.

### III. Honest and Ethical Business Practices

#### A. Antitrust and Fair Competition

PACCAR competes vigorously to provide customers with outstanding vehicles, parts, and other products and services at prices it determines, in its own judgment, will attract, win, and keep their business. In doing so, PACCAR complies with the antitrust laws and rules of fair competition in all jurisdictions where it operates. PACCAR does not engage in or condone anticompetitive behavior. Failure to follow the antitrust laws could result in significant criminal and civil monetary penalties imposed on both PACCAR and the individuals who violate the law and, in some jurisdictions like the U.S., individuals who violate certain antitrust laws prohibiting conspiracies with competitors can even be sentenced to prison time.

**Competitor Interactions.** *PACCAR makes its own, independent decisions* about price, how much to produce, what components and features to offer on our vehicles, ***without discussing and agreeing with any competitors.***

Agreeing with competitors on any of those core competitive decisions is prohibited. It is critical to ensure that PACCAR does not enter into any agreement with any competitor on:

- Prices (including discounts or any other term of price) at which we will sell our products or services (or buy components, parts, or other products or services)
- Other competitive terms of sale, such as when and how to offer innovative new products or technologies
- Output (how much PACCAR makes and sells)
- Allocating or dividing markets, customers, or suppliers or otherwise agreeing not to compete against each other

Note that these prohibitions cover all aspects of our business, including PACCAR's decisions about who and how many people to hire, and what to pay them. Those decisions must be made by PACCAR on its own and PACCAR may not agree with competitors or other companies not to poach, hire, solicit each other's employees, or on what salaries, wages, or other benefits to provide.

PACCAR is permitted to gather competitive intelligence from customers and third parties in the marketplace, such as industry experts or publications, and to use that intelligence to make independent decisions. PACCAR should not obtain that intelligence from competitors, share non-public information with them, or use a third party as a conduit to funnel competitive information back and forth with a competitor. Decisions on price and other competitive elements must always be made without any agreement with competitors.

There are some legitimate reasons to communicate with competitors (for example, trade association activity or joint venture efforts to develop new products or new capabilities), but those situations should not lead to agreements on price, output, or market divisions. If you have any questions on where the line is between permissible and impermissible interactions with competitors, you should seek guidance in advance from the Legal Department.

**Customer and Supplier Interactions.** All companies have a fair amount of freedom under the antitrust laws to interact with customers and suppliers as they see fit. This freedom is not unlimited, however. Agreements between PACCAR and its customers or suppliers can cause antitrust concerns in certain circumstances, although these types of supplier or customer agreements are analyzed under a more lenient legal standard and are typically permissible when PACCAR operates in competitive markets and does not have or exercise monopoly power.





Certain other practices can be considered “unfair methods of competition” and may be illegal, including:

- *Wrongfully inducing a competitor’s customer to breach a contract with that competitor by using threats, fraud, bribery, or coercion*
- *Committing industrial espionage to acquire a competitor’s trade secrets*
- *Bribing an employee of either a competitor or a customer for any purpose*
- *Making false or disparaging comments about a competitor’s product*

Still, it is appropriate to seek antitrust guidance from the Legal Department before terminating a dealer (or any customer) or supplier, entering into any exclusive contracts, suggesting or requiring a dealer or other party to sell only to certain customers, but not others, or to charge a certain price when it re-sells a PACCAR vehicle, part, or other product.

Because antitrust and fair competition regulations are complicated, employees should not hesitate to contact one of the PACCAR Resources with questions or concerns, including the Legal Department or the Compliance Office.

## **B. Anti-Bribery and Corruption**

Bribes, improper payments, unjust advantages, and attempted bribes in any form to anyone are all potentially violations of, among other things, this Code of Conduct, PACCAR’s anti-bribery policies, the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act, and the Brazilian Anti-Corruption law (Law No. 12.846/13). PACCAR maintains a zero-tolerance policy and prohibits bribery or the provision of unjust advantages, regardless of whether they are intended for commercial parties or public officials. For more information and guidance on anti-bribery and business hospitality spending limits, please see PACCAR’s anti-bribery policies, the [DAF Anti-Bribery Manual](#) or your local policy.

### C. Anti-Money Laundering

Money laundering is a process used by criminals, terrorists, and others to move illicit funds through legitimate businesses to make the funds appear legitimate. Use good judgment and pay close attention when working with dealers, customers, suppliers and third parties, especially if the transaction involves any money-laundering red flags, such as unclear customer identity or use of cash. You are required to follow the Company's policies on cash and customer due diligence. Always know who is behind every transaction and only conduct business with reputable third parties engaged in legitimate business activities. Take action to prevent the misuse of PACCAR's business transactions by reporting suspicious activity to the Legal Department or the [Compliance Office](#).

### D. Business Hospitality – Gifts, Entertainment and Travel

PACCAR may only provide business hospitality consistent with Company policies and all relevant laws, including the FCPA and the U.K. Bribery Act. Before giving or receiving gifts or other business hospitality, be sure to review PACCAR's anti-bribery policies for details on specific limits. There are very strict laws pertaining to government officials and the spending limits may also apply to commercial parties.

PACCAR requires that all forms of business hospitality be appropriate in the circumstances. Employees may not accept or provide business hospitality if it will obligate, or appear to obligate, either PACCAR or the recipient. Soliciting gifts or lavish hospitality from vendors, suppliers, or other business partners for you or for PACCAR is not allowed. The only permitted exceptions are providing or accepting customary sales promotional items, occasional meals, or other nominal non-cash items, if the value is in line with PACCAR's spending requirements, the [Business Travel & Expense Procedure](#), PACCAR's anti-bribery policies, the [DAF Anti-Bribery Manual](#) or other applicable local policy.



## Potential conflicts of interest include:

- Working for, or receiving compensation from, a PACCAR dealer, customer, supplier or competitor
- Engaging a supplier owned or managed by a relative
- Having a personal financial interest in a Company transaction
- Accepting a gift from a contractor in violation of Company policy
- Missing work because of a second job

## E. Conflicts of Interest

A conflict of interest is any activity that is inconsistent with or opposed to the legitimate best interests of the Company. Employees should avoid any activity, investment or interest that might reflect unfavorably upon their own integrity and reputation or the Company's. You are expected to avoid situations that raise or even appear to raise a conflict of interest, including any circumstance that could cast doubt on whether employees are acting in the best interests of PACCAR. You must be transparent and disclose a conflict or potential conflict to Human Resources, in order to give PACCAR an opportunity to cure the conflict. Please refer to [SP 20 Conflicts of Interest](#) or your local policy for more information.

PACCAR values commitment and expects you to devote your best efforts to working for the Company. Subject to applicable local law, PACCAR prohibits all current employees from working for other organizations in a manner that interferes with their ability to work for PACCAR. This includes, but is not limited to, performing work for a company that competes, either directly or indirectly, or a company that actively has relations with PACCAR or any of its subsidiaries. In addition, any interests or employment held by members of an employee's immediate family in a competing company must be disclosed and communicated in writing to Human Resources. Please be sure that you have submitted an accurate and complete disclosure form or other applicable local documentation to Human Resources.

## F. Charitable and Political Contributions

PACCAR supports community development throughout the world. Employees may not, however, use Company resources to personally support charitable or other non-profit institutions without Company approval. You may not make or commit to political contributions on behalf of PACCAR. For more information about acceptable charitable contributions and the approval process, please see [SP4 Charitable Contributions, Scholarships and Sponsorships](#). Any charitable donation must be consistent with anti-corruption laws and not be intended to influence the recipient to award business to PACCAR.

## IV. Financial Integrity

### A. Accurate Financial Results

PACCAR's financial statements, books, and records must accurately and fairly reflect all company transactions in order to ensure legal and ethical business practices and to prevent fraudulent activities. It is a violation of Company policy and certain laws for any employee to cause PACCAR's books and records to be inaccurate. Employees may not create records that are intentionally misleading or inaccurate and are expected to cooperate fully with PACCAR's internal and independent auditors.

Complaints or concerns regarding accounting, internal controls, auditing, or tax matters require special attention and must be reported to the Chief Financial Officer, your Operations or local Controller, Internal Audit, the Legal Department, or the [Compliance Office](#).



### B. Disclosure Requirements

PACCAR's shares are publicly traded. As a result, the Company is legally obligated to make various disclosures to the public. PACCAR maintains controls and procedures to ensure full, fair, accurate, and timely disclosure of required information. All receipt and payments of Company funds must be authorized by management and properly recorded, and PACCAR's records must disclose the accurate nature and purpose of transactions. All employees responsible for the preparation of the Company's public disclosures, or who provide information as part of that process, have a responsibility to ensure that such disclosures and information are complete, accurate and in compliance with the Company's disclosure controls and procedures.



### C. Use of Company Assets

Use of Company assets is permitted only in accordance with the Company's general or specific authorization and transactions must be executed in accordance with those authorizations. Transactions must be recorded to permit preparation of financial statements in conformity with generally accepted accounting principles and related requirements and to maintain accountability for PACCAR's assets.

### D. Retaining Proper Business Records

PACCAR is responsible for ensuring that the information the Company records, processes, and analyzes is accurate, and recorded in accordance with applicable legal and accounting principles. PACCAR employees must also ensure that proper and timely business records are made readily available to those with a need to know the information, such as auditors or government agencies. Employees are required to comply with all recordkeeping laws, regulations, and Company policies.

All PACCAR employees must manage and protect the security and integrity of business records, which come in a variety of forms, including physical and electronic records. Create only complete, accurate, and truthful records. Be clear and professional when creating any business record, including email. Administrative and accounting controls, including [PACCAR's Records Retention Schedule](#), have been implemented to provide reasonable assurance that the Company's financial and other reports are accurately and reliably prepared, and fully and fairly disclose all required information. For more information about how to maintain records, please see [SP14 Records Retention Policy](#) or your local policy.

If PACCAR is involved in certain legal issues or is the subject of an investigation, the Legal Department may issue a 'legal hold.' When there is a legal hold, PACCAR employees are required to retain all records related to the matter in question. Violations of legal holds may subject the Company and individuals to liability. Always follow all legal hold instructions and contact the Legal Department if you have any questions.



## V. Interaction with PACCAR Partners

### A. Customer Interaction and Information

Employees must always remember that he or she represents PACCAR when they interact with customers. Employees should treat customers fairly and with respect, including dealers, which are a type of PACCAR customer. PACCAR also expects customers to act ethically and in a manner consistent with the Code of Conduct.

Across all PACCAR locations, the Company maintains customer confidences and safeguards all data and information entrusted to us by customers. Remember these simple rules:

- Only access customer information as needed for legitimate business purposes with consent
- Do not share customer information outside the Company
- Share customer information inside the Company only with appropriate people who have a ‘need to know’
- Abide by any applicable non-disclosure agreements
- Notify the IT Department or the Legal Department immediately if you suspect a breach of customer information has occurred

PACCAR also expects business partners, including dealers and suppliers, to protect customer information. If you have any questions, please contact the IT Department, your local Controller, the Legal Department, the [Data Protection team \(DataProtection@paccar.com\)](mailto>DataProtection@paccar.com), or one of the other PACCAR Resources before collecting, transferring, processing, disclosing or disposing of customer data.

## B. Dealers, Suppliers and Other Partners

PACCAR selects dealers and suppliers based on many factors, including quality, innovation, cost, financial viability, and regulatory compliance. All PACCAR dealers, suppliers, third parties, and other business partners must exhibit the highest ethical principles, consistent with the standards and principles contained in the Code of Conduct, including those related to anti-bribery, antitrust and fair competition, trade compliance, and business ethics. PACCAR strives to support partners that exemplify dedication to diversity and inclusion by providing opportunities for minorities and women. PACCAR business partners must demonstrate respect for human rights by, among other things, abiding by all rules and regulations governing human trafficking, forced and child labor, and conflict minerals.

When engaging dealers, suppliers, and other partners, you must follow all applicable quality, procurement and compliance procedures. In some situations, you may be asked to complete screening procedures to ensure that PACCAR only engages reputable business partners. Some dealers and suppliers will be required to certify that they have reviewed and understand PACCAR's Code of Conduct and will comply with its standards. For more information on compliance screening procedures for third party partners, please see PACCAR's anti-bribery policies, the [EU Trade Restrictions Manual](#), or your local policy.

## C. Government Business and Contracting

When conducting business with federal, state, or local governments, PACCAR must ensure all statements and representations to government procurement officials are accurate and truthful, including pertaining to pricing and other financial data. The laws that apply when working with the government may be more comprehensive than those that apply when working with private companies. If your work involves government business, be alert to the special rules and regulations applicable to government customers or authorities. All communication with government officials on behalf of the Company must be authorized by management and should be in coordination with PACCAR designated government affairs departments. It is important to comply with any government procurement requirements and strictly follow all terms and conditions of any government contract. For additional information about interacting with public officials, please see Section III.B - Anti-Bribery and Corruption, or PACCAR's anti-bribery policies.

## VI. Global Trade Compliance

PACCAR is required to follow the trade-related laws of the U.S., the E.U., the U.N., and all other countries in which we operate. Employees involved in conducting cross-border business have the responsibility to understand how relevant trade rules apply. Trade compliance law, rules, and regulations are varied, complex and change frequently. If you have any questions regarding compliance with global trade laws, contact the Purchasing and Logistics Department, the [Compliance Office](#), or the Legal Department before proceeding.

### A. Import and Export

Many countries in which PACCAR operates have laws and regulations restricting the transfer, import, export, and sale of various types of products or technical data from one country to certain proscribed countries and persons. If you are involved in importing and exporting goods and data, you need to be familiar with and understand import and export requirements and PACCAR trade policies. These laws require, among other things, that PACCAR properly document the classification, value, and country of origin of all imports. PACCAR is also subject to export control requirements applicable to controlled technology, such as dual-use military goods. Employees involved in logistics and shipments are required to be familiar with and abide by applicable export controls. Failure to follow these rules and regulations may subject PACCAR to fines, revocation, or denial of export or import privileges.





## B. Trade Sanctions and Embargoes

The U.S., E.U., U.N., and other governmental authorities prohibit transactions with certain countries, persons or entities that have violated export-related laws or are believed to pose a threat to national security. All PACCAR employees must abide by all applicable economic sanctions or trade embargoes that the U.S. has adopted, whether they apply to foreign countries, political organizations or particular foreign individuals and entities, as well as any related reporting requirements. In the E.U., employees need to comply with both the E.U. and U.S. laws and regulations. If there is a question of which law applies in non-U.S. jurisdictions, please contact the Legal Department for guidance.

## C. Economic Boycotts

By law, PACCAR and its subsidiaries may not cooperate with foreign boycotts that are not approved by the U.S. government. PACCAR is required to report any requests to cooperate with boycotts that are not sanctioned by the U.S. government. Those requests can be disguised in bid requests, purchase orders, contracts, letters of credit, shipping documents or other communications. If you receive a request related to a non-U.S. economic boycott, do not respond to the request and immediately contact the Legal Department or the [Compliance Office](#).



## VII. Responsibility to Investors and Shareholders

### A. Confidential Information

PACCAR employees often learn confidential or proprietary information about PACCAR, customers, prospective customers, or other third parties, during the normal course of business. Information is a valuable Company asset that employees have a duty to protect. You must maintain the confidentiality of all information entrusted to you, except when disclosure is authorized or legally mandated. Confidential or proprietary information includes internal PACCAR information and any nonpublic information provided by third parties, such as from dealers or suppliers, with the expectation that the information will be kept confidential and used solely for valid business purposes.

You may only disclose confidential information to other PACCAR employees on a ‘need-to-know’ basis. Use discretion when discussing PACCAR business in public areas and do not misuse confidential information for your own benefit. Employees should follow [SP16 Protection of Confidential Insider Information](#) and [SP21 Protection of Confidential Information and Trade Secrets Policy](#), which address handling of the Company’s confidential information, whether financial or otherwise. When working with third parties, PACCAR may sign a nondisclosure agreement, and employees must abide by the terms of those agreements. All PACCAR employees are responsible for safeguarding Company and third-party information even when they are no longer working for or with PACCAR.

### B. Protecting Company Assets

PACCAR is responsible for protecting PACCAR’s assets and ensuring their proper use. PACCAR employees may not use Company assets, such as e-mail, computer systems, documents, facility equipment or provide Company services for any unauthorized purpose. “Off-the-books” funds or assets are strictly prohibited. Be alert to fraud or any other situation that could lead to the loss, misuse, or theft of PACCAR’s assets. Fraud may include improper personal use of a Company credit card and false or misleading expenses or other financial documents. Phishing attacks can come through email that cleverly masks the sender. Never transfer any funds without proper verification. The misuse of Company assets or resources for personal purposes or financial gain is strictly prohibited.

Confidential information may include any of the following:

- Employee or customer data
- Strategy presentations
- Forecasts
- Sales reports
- Earnings
- Financial condition
- Contracts
- Significant transactions
- Pricing information
- Discoveries and inventions
- Product ideas
- Internal processes
- Software
- Trade secrets
- Service documentation
- Product drawings, specifications and documentation

*The above list is non-exhaustive. Other types of information may be considered confidential or proprietary. If in doubt, consult any of the PACCAR Resources, including your manager, the Marketing and Communications Department, or the Legal Department.*



## Intellectual Property of Others

### Responsible Actions:

- *Respect the trademarks, copyrights and patents of others*
- *Follow all applicable laws concerning use of copyrighted materials*
- *When in doubt, check with the Legal Department*

### Unacceptable Actions:

- *Make unauthorized copies of books, articles, drawings, computer software or other copyrighted materials*
- *Infringe the patented technology of others*

## C. Audits and Investigations

During your employment with PACCAR, you may be asked to participate in an audit or internal investigation conducted by internal auditors, external auditors, Human Resources, the Compliance Office, or the Legal Department. You are expected to cooperate fully and communicate honestly. PACCAR prohibits retaliation for raising good faith complaints. Acts of retaliation are violations of this Code of Conduct. You may also receive a request for documents or to meet with regulators or lawyers in connection with a legal proceeding. If you receive such a request, you should immediately contact the Legal Department for assistance.

Failure to cooperate fully or communicate honestly during an audit or investigation may result in disciplinary action up to and including termination in accordance with local law and collective agreements. If an investigation reveals that an employee chose a course of action that is inconsistent with PACCAR's Code of Conduct, other policies, or the law, he or she may be disciplined appropriately up to and including termination of employment, and, where warranted, face potential legal action. In addition, PACCAR will contact the appropriate authorities and involved employees may be subject to government fines, civil liability, or even criminal liability.

## D. Intellectual Property

PACCAR values and protects its intellectual property ("IP") assets, such as copyrights, patents, trademarks, trade secrets, and proprietary information, while simultaneously respecting the valid IP rights of third parties. Copyright laws protect the copying of materials such as computer software, music, photos, audio, video, books, presentations, and training materials. Patent laws grant protections for inventions and exclude others from making, using, or selling the patented invention. Trademark laws protect brand names, including product and services names, and trade secret laws protect proprietary information that is maintained as a secret, such as Company know-how and business information. Employees must not disclose IP outside of PACCAR without first obtaining approval from the Legal Department. Any employee who becomes aware of an infringement or violation of the Company's IP rights must report it immediately. For more information, see [SP21 Protection of Confidential Information and Trade Secrets](#) and [SP22 Inventions, Patents, and Copyrights](#) or your local policy.



## E. Cybersecurity and Electronic Communication

PACCAR understands the importance of cybersecurity in protecting customers and incorporates security by design throughout all phases of product, service and infrastructure development. The Company's computers and communication systems, including the Internet, email, and messaging applications are intended for PACCAR business use only. Employees are required to use PACCAR's equipment and systems responsibly and to protect them from theft and damage.

All PACCAR employees, contractors, and third parties play an important role in PACCAR's security program. Do not use Company electronic communication systems or devices in any way that is illegal, unethical, disruptive, or offensive to others. These obligations extend to off-site use of Company equipment. You may not access or create harassing, disparaging or inappropriate content and should be professional when drafting email messages. To report questionable or offensive material, please contact a manager, the IT Department, or Human Resources.

PACCAR maintains the right to access, monitor, delete, destroy and investigate Company electronic systems, as well as other Company property, to the extent permitted by local law and collective agreements. Any business use of messaging systems must follow the Company's document retention policies. PACCAR also reserves the right to eliminate any threat to the security of the Company's electronic systems. To protect the security of PACCAR computers and communication systems, employees must follow the Company's requirements for responsible IT use. For more information, please see [SP19 Information Technology Responsibility](#) and [SP28 Electronic Communications Guidelines](#). If you are aware of any threats to PACCAR's IT or communication systems, please immediately contact the IT Department.

Electronic communication systems and devices include, but are not limited to:

- *Smart phones*
- *Tablets*
- *Cell phones (voicemail and text messages)*
- *Computers (PCs and laptops)*
- *Email*
- *Internet*
- *Instant messaging applications*
- *Any other type of electronic communication*

## Examples of material non-public information include:

- *New product plans or new product development*
- *Government investigations*
- *Changes in executive management*
- *Significant potential legal claims*
- *Possible mergers, acquisitions, divestitures, or joint ventures*
- *Winning or losing an important contract or customer*

## Five Important Tips on Data Privacy

1. *Only discuss or review personal or customer information necessary to perform your work*
2. *Do not share anyone else's personal information unless authorized by Human Resources or the Legal Department*
3. *Only use personal or customer information for the initial purpose it was provided or required by law*
4. *Periodically destroy any personal identifying information according to PACCAR's Document Retention Policy unless you are required by law to maintain it*
5. *For any managers of international teams, be aware of cross-border data transfer concerns and involve the [Data Protection team](#) if you have questions!*

## F. Inside Information

Through your work, you may have access to material, nonpublic information about PACCAR or a customer, dealer, supplier, or other third party. This information is considered “inside” information. “Material” information is information that could influence an investor’s decision to buy or sell PACCAR or that company’s stock. Buying or selling securities while in possession of material non-public information or “tipping” others who might make an investment decision on the basis of this information is not only unethical, it is illegal and could result in large fines and even imprisonment. To learn more, see [SP16 Protection of Confidential Insider Information](#). Consult with the Legal Department if you are unsure whether you have material inside information.

## G. Privacy

PACCAR complies with globally recognized privacy principles and only collects, holds, processes, and uses personally identifiable information for legitimate business purposes in accordance with applicable laws. Subject to local law and collective agreements, PACCAR reserves the right to access Company electronic systems as well as other Company property. PACCAR employees should not assume that the websites in their browsing history or emails and chat messages sent using company devices are private.

Data privacy and protection laws apply to many of the countries in which PACCAR operates, such as the E.U. General Data Protection Regulation. Some countries restrict the transfer of personal data (any information relating to an identifiable natural person) across national borders. PACCAR is committed to compliance with privacy laws in all countries in which it conducts business. If you have any concerns or complaints about the privacy of your information or any potential incident of disclosure of any confidential information, you may contact the [Data Protection team \(DataProtection@paccar.com\)](#), the [DAF Data Protection Officer](#), or the Legal Department. For more information, see the [PACCAR Privacy Statement](#), [SP28 Electronic Communication Guidelines](#) or your local policy.

## H. Interactions with the Media, Investors and the Public

PACCAR values its relationships with the investment community and the media and is committed to providing full, fair and accurate press releases and public communications. Unless authorized by PACCAR Investor Relations or the appropriate division department, you may not speak with the media, investors, and analysts on behalf of the Company. Do not give the impression that you are speaking on behalf of PACCAR in any communication that may become public, including posts to online forums, social media sites, blogs, chat rooms, or bulletin boards. All investor requests should be directed to the Investor Relations Department. Any media requests should be directed to your division Marketing Department. For more information, please see [SP11 Company Publicity and Announcements](#).

## I. Use of Social Media

Social media is of growing importance in the marketplace, enabling us to learn from and share information with PACCAR stakeholders, including customers, and suppliers, as well as communicate with the public about PACCAR. Unless authorized by PACCAR Investor Relations or your division Marketing Department, you may not speak for or on behalf of the Company when using social media. Do not share confidential or proprietary information about PACCAR, dealers, customers, business partners, or your work activities and projects on social media.

PACCAR respects the rights of employees to use blogs and other social media tools not only as a personal form of expression, but also as a professional means to further develop Company business. All employees should act professionally and use sound judgment when engaging in social media and online conversations that reference PACCAR and/or employee relationships with PACCAR. Communications to co-workers and affiliates on social media that violate PACCAR policies will be treated the same as violations in email or in person. Only certain authorized personnel at PACCAR may use social media to represent PACCAR and to, among other things, market the Company's products and services, conduct market research, or search for job candidates. When in doubt, do not post and contact the Human Resources or the Legal Department for guidance.



## VIII. PACCAR Resources

### A. Reporting Concerns

There are many resources available to help you answer questions, make difficult decisions, and report concerns or potential violations of policies, regulations, or laws, including:

- Your manager or supervisor
- Human Resources
- Internal Audit Department
- General Counsel or any member of the Legal Department
- [Compliance Office](mailto:Compliance@paccar.com) (Compliance@paccar.com)
- [Data Protection team](mailto:DataProtection@paccar.com) (DataProtection@paccar.com)
- [EthicsLine Reporting System](#)

### B. EthicsLine Reporting System

In addition to the many reporting resources available at PACCAR, you may report concerns to EthicsLine, the Company's independent third-party reporting administrator. EthicsLine is available online at <http://ethicsline.paccar.com> to allow employees and other external individuals a means to report potential wrongdoing. EthicsLine also operates a toll-free confidential helpline call center that is available 24 hours a day, seven days a week. EthicsLine operators and the web-reporting system can receive questions or reports in multiple languages. If you call the phone-lines and would like to speak with an interpreter, please request one by stating your preferred language.

Employees can reach the EthicsLine call center at 1 (800) 300-1826 from within the U.S. If you are reporting from outside the U.S., dial the country's direct dial access (listed on the final page) and you will be prompted to enter the U.S. number as a code.

In most cases, you may make an anonymous report using the EthicsLine Reporting System. However, not every country permits anonymous reporting on every concern. When you call the helpline or make a report online, you will be asked for your work location. EthicsLine operators and systems will then guide you in making a report, based on your location. Please contact [EthicsLine](#), the [Compliance Office](mailto:Compliance@paccar.com) at Compliance@paccar.com, or a member of the Legal Department with any questions.

Employees can reach the EthicsLine call center at 1(800) 300-1826 from within the U.S or online at <http://ethicsline.paccar.com>. If you are reporting from outside the U.S., dial the country's direct dial access (listed below):

Australia	1-800-023-078
Austria	0-800-068-722
Belgium	0-800-174-44
Brazil	0-800-591-0948
Canada	1-800-300-1826
China	400-1204146
Colombia	01-800-5189365
Czech Republic	800-142-477
Denmark	802-54001
France	0800-90-57-64
Germany	0800-180-1726
Guatemala	999-9190 (at the English prompt dial 800-300-1826)
Hungary	80-088237
India	000-800-0501369
Italy	800-194-762
Mexico	800-099-0389
Netherlands	0800-022-6709
Panama	800-0561
Poland	0-800-491-1982
Portugal	800-181-735
Russia	8-800-100-3671
Spain	900-99-7928
Switzerland	0800-56-1986
Turkey	0811-288-0001 (at the English prompt dial 800-300-1826)
United Kingdom	0800-060-8775
United States	1-800-300-1826