

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XAVIER LAURENS, individually and on)
behalf of all others similarly situated,)
)
Plaintiff,)
v.)
)
VOLVO CARS OF NORTH AMERICA,)
LLC, a Delaware limited liability corporation,)
and VOLVO CAR USA, LLC, a Delaware)
limited liability corporation,)
)
Defendants.)

Case No. _____

JURY TRIAL DEMANDED

CLASS ACTION COMPLAINT

Joseph J. Siprut
jsiprut@siprut.com
Todd L. McLawhorn
tmclawhorn@siprut.com
John S. Marrese
jmarrese@siprut.com
SIPRUT PC
17 North State Street
Suite 1600
Chicago, Illinois 60602
Phone: 312.236.0000
Fax: 312.754.9616
www.siprut.com

*Attorneys For Plaintiff
And The Proposed Putative Class*

Plaintiff Xavier Laurens (“Plaintiff”) brings this Class Action Complaint against Defendants Volvo Cars of North America, LLC, and Volvo Car USA, LLC (collectively, “Volvo” or “Defendants”), individually and on behalf of all others similarly situated, and complains and alleges upon personal knowledge as to himself and his own acts and experiences and, as to all other matters, upon information and belief, including investigation conducted by his attorneys.

I. NATURE OF THE ACTION

1. Volvo manufactures and sells premium automobiles, including sports utility vehicles. Volvo markets its environmental and safety features to differentiate Volvo cars from those of other car manufacturers, and offers those features as reasons for consumers to purchase Volvo cars.

2. Among its product offerings, Volvo sells the XC90 T8 (“T8”), which is a seven-passenger sport utility vehicle that contains a twin engine combining a gasoline engine with an electric motor, and has the ability to operate solely on the electric motor. In various press releases, brochures and product placements with trade publications, as set forth in more detail below, Volvo repeatedly represented in 2014 and 2015 that the T8 would have the capability to be driven solely on a battery charge for approximately 25 miles, which Volvo claimed would cover the average commute and daily errands for most people.

3. Based on Volvo’s representations, Plaintiff ordered a T8 from his local Chicago Volvo dealer and waited nearly eight months before taking delivery in January 2016. Plaintiff paid over \$83,000 for the T8. Unfortunately, the T8 does not come close to achieving 25 miles on a full electric charge. Rather, the T8 provides approximately 8 to 10 miles on a full electric charge—a far cry from the 25 miles promised by Volvo. And while Volvo now apparently claims that the range on the T8 is 17 miles, the only apparent method to even come *close* to the 17-mile range is

to drive the T8 at 40 miles an hour on the highway—with all the safety features disabled.

4. As a result of this reduced electric battery capacity, Plaintiff is unable to complete his daily commute or everyday tasks without using the gasoline engine, which prevents Plaintiff from obtaining the cost saving effects of foregoing gasoline for local trips and the environmental benefits of operating solely on electricity.

5. Plaintiff paid a hefty premium for the T8's electric motor. The seven-passenger Volvo XC90 T6, which does not contain the electric motor, starts at \$49,800. By contrast, the seven-passenger T8, with the electric motor, starts at \$68,100. All the other base features on the T6 and T8 are identical. Thus, Volvo is receiving, and Plaintiff paid, an \$18,300 price premium for the electric motor—an electric motor that does not perform as promised.

6. Plaintiff brings this case on behalf of the following class: All individuals who purchased or leased a Volvo XC90 T8. Plaintiff asserts claims for violation of the Illinois Consumer Fraud and Deceptive Business Practices Act and similar consumer fraud statutes of other states, fraud, breach of express warranty, and unjust enrichment. Plaintiff seeks to recover the damages he has suffered as the result of Volvo's conduct.

II. JURISDICTION AND VENUE

7. This Court has jurisdiction over the parties and the subject matter of this proceeding pursuant to 28 U.S.C. § 1332(d)(2). In the aggregate, Plaintiff's claims and the claims of the other members of the Class exceed \$5,000,000 exclusive of interests and costs, and there are numerous class members who are citizens of states other than Defendants' states of citizenship. In addition, this Court has specific jurisdiction over Defendants because Defendants conduct substantial business in the State of Illinois.

8. Venue is proper in this judicial District pursuant to 28 U.S.C. § 1391(b)(1), (2), and

1391(c). By carrying out substantial business in this District, Defendants are deemed to reside here and are subject to this District's personal jurisdiction. Furthermore, a substantial part of the events giving rise to the claims emanated from activities within this District.

III. PARTIES

Plaintiff

9. Plaintiff is a natural person currently domiciled in Chicago, Illinois. For purposes of 28 U.S.C. § 1332, Plaintiff is a citizen of the State of Illinois. Plaintiff owns a 2016 Volvo XC90 T8.

Defendants

10. Defendant Volvo Cars of North America, LLC ("VCNA") is a Delaware limited liability company with its principal place of business in the State of New Jersey. VCNA is a wholly-owned subsidiary of Volvo Car Corporation, which is a Swedish corporation with its principal place of business in Gothenburg, Sweden, and which manufactures Volvo-branded cars. VCNA provides marketing, sales, distribution, parts service and training support for Volvo brand passenger cars in the United States. VCNA is an authorized importer and distributor of Volvo motor vehicles in the United States. For purposes of 28 U.S.C. § 1332, VCNA is a citizen of Sweden.

11. Defendant Volvo Car USA, LLC ("VCUSA") is a Delaware limited liability company with its principal place of business in New Jersey. VCUSA is an authorized importer and distributor of Volvo motor vehicles in the United States. All of VCUSA's members are citizens of New Jersey or Sweden. Thus, for purposes of 28 U.S.C. § 1332, VCUSA is a citizen of New Jersey and Sweden.

IV. FACTUAL BACKGROUND

Volvo's Business

12. Volvo Car Corporation first started manufacturing cars in 1927. Volvo Car Corporation has manufacturing facilities in Sweden, Belgium, and China and produces a premium range of cars that includes sedans, wagons, sportswagons, cross country cars and sports utility vehicles aka SUVs. Volvo Car Corporation is now owned by Zhejiang Geely Holding of China.

Volvo's Representations About the 2016 XC90 T8

13. In 2014, Volvo announced that Volvo Car Corporation was redesigning its popular selling XC90, which is a five to seven person sports utility vehicle. Included in the redesign was an XC90 model with a twin engine plug-in hybrid that was capable of running solely on electricity. This model was the XC90 T8, and it was first revealed at the Paris Motor Show in October 2014.

14. Beginning in late 2014, Volvo began to tout the redesigned T8.

15. On October 21, 2014, VCUSA issued a press statement about the “all-new Volvo XC90.”¹ In that press release, VCUSA touted “[t]he top of the range XC90 Twin Engine, which combines a supercharged and turbocharged petrol engine with an electric motor, offers an unrivalled combination of power and clean operation”² VCUSA stated that the range for driving on pure electric power “will be around 40 kilometres.”³ A range of 40 kilometres translates to a range of 24.85 miles.

16. On December 8, 2014, VCUSA issued a press release stating that “[t]he XC90 T8 has a range of more than 40km using just electricity, which covers the total distance most people drive in one day.”⁴

¹ Ex. 1, Volvo Press Release, Oct. 21, 2014.

² Ex. 1, p. 3.

³ Ex. 1, p. 3.

⁴ Ex. 2, Volvo Press Release, Dec. 8, 2014.

17. On April 16, 2015, VCUSA issued another press release about the T8.⁵ This time VCUSA stated “[p]reliminary testing based on EPA criteria produced an estimated range of 17 miles using just electricity, which represents a high percentage of drivers’ typical daily usage.”⁶

18. Similarly, Volvo produced a marketing brochure that stated: “Fully charged, the T8 Twin Engine provides 17 miles (estimated) of pure electric driving – sufficient to cover most commutes and everyday scenarios.”⁷ In that same brochure, Volvo praised the XC90 as “the safest, most advanced production care we have ever made; the most powerful and the most efficient.”⁸

19. Two weeks later, on April 30, 2015, VCUSA went back to its original claims concerning the T8’s electric range from its April 16 press release and surpassed them, stating that the T8 delivers “43km pure electric range.”⁹ A range of 43km translates to a range of 26.72 miles. VCUSA explained: “The improvement over the earlier announced figures were achieved thanks to the continuous innovation cycle at the Swedish company. . . . This makes the XC90 T8 Twin Engine the clear leader in its segment, with an exceptional combination of low fuel consumption, emissions and pure power.”¹⁰ VCUSA went on to note: “No other SUV in this class can deliver 43km of pure electric range”¹¹

20. On January 21, 2016, VCUSA issued a press release stating “[t]he XC90 T8 has a range of more than 40 km using just electricity, which covers the total distance many people drive in one day.”¹²

21. To this day, Volvo continues to represent, on its web page, that the T8 has an

⁵ Ex. 3, Volvo Press Release, Apr. 16, 2015.

⁶ Ex. 3, p. 1.

⁷ Ex. 4, Volvo Brochure (“The All New Volvo XC90”), p. 26.

⁸ Ex. 4, p. 5.

⁹ Ex. 5, Volvo Press Release, Apr. 30, 2015, p. 1.

¹⁰ Ex. 5, p. 1.

¹¹ Ex. 5, p. 1.

¹² Ex. 6, Volvo Press Release, Jan. 21, 2016, p. 1.

“Electric Range of approximately 25 miles.”¹³

22. The XC90 starts with an MSRP of \$43,950. The XC90 T6, which seats seven passengers, as does the T8, starts at an MSRP of \$49,800. The XC90 T8 plug-in hybrid starts at an MSRP of \$68,100.

23. Volvo’s claims about the electricity range are important and material to a purchase decision. Indeed, Volvo also claims that it “is the only manufacturer that offers a hybrid SUV with seven seats.”¹⁴ Similarly, Volvo claims that it is the leader in its segment due to the electric battery range.

Trade Publications

24. In addition to the representations Volvo made in press releases and on its website, Volvo also provided information to auto trade publications and car magazines, which Volvo knew would be relied upon by the publications and potential Volvo purchasers, concerning the electric battery range.

25. For example, on February 19, 2015, Green Car Reports noted that Volvo quoted an electric battery range of 25 miles, but that Green Car Reports estimated the real range would ultimately be 18-21 miles.¹⁵ Similarly, on May 21, 2015, Green Car Reports noted that the electric range was 25 miles, but that the EPA range may be lower.¹⁶

26. On May 3, 2015 Car Magazine UK stated that the T8 electric battery range was 26

¹³ <http://www.volvocars.com/us/cars/new-models/all-new-xc90/specifications> (last visited Mar. 31, 2016).

¹⁴ Ex. 4, p. 26.

¹⁵ J. Voelcker, “2016 Volvo XC90 Plug-In Hybrid ‘Twin Engine’: First Drive,” Feb. 19, 2015, available at http://www.greencarreports.com/news/1096866_2016-volvo-xc90-t8-plug-in-hybrid-twin-engine-first-drive (last visited Mar. 31, 2016).

¹⁶ S. Edelstein, “2016 Volvo XC90 T8: First Plug-In Hybrid With 240-Volt Charging Cord, May 21, 2015, available at http://www.greencarreports.com/news/1098399_2016-volvo-t8-first-plug-in-hybrid-with-built-in-240-volt-charging (last visited Mar. 31, 2016).

miles.¹⁷

27. In April 2015, Inside EVs printed Volvo's representation that "[t]he Volvo XC90 T8 has a range of up to 25 miles using just electricity, which covers the total distance most people drive in one day."¹⁸

28. The figures provided by Green Car Reports, Car Magazine UK, and Inside EVs are consistent with the figures provided by Volvo in its press releases.

Plaintiff's Purchase

29. In February 2015, Plaintiff placed an order for a 2016 Volvo XC90 T8 with the Howard Orloff Volvo dealership in Chicago. Plaintiff paid a \$1,000 deposit. At that time, Volvo had represented through the written materials and press releases above, and through articles it placed in trade publications, that the T8 would have an all-electric range of 25 miles. Plaintiff reviewed many of those written materials and was aware of Volvo's representations regarding mileage capacity using only electricity before placing an order for the T8. Among other things, Plaintiff reviewed information about the T8 on the Volvo website, as well as the Green Car Reports, Edmunds, Autoweek, and Car Magazine websites. Plaintiff finalized his order on June 30, 2015.

30. The all-electric battery range was important to Plaintiff because with a 25 mile range, he would be able to commute daily in Chicago, and not have to use any gasoline to do so.

31. The price of the T8, excluding sales tax, was \$83,475. This price represented a price premium of approximately \$20,000 for the hybrid model.

¹⁷<http://www.carmagazine.co.uk/car-news/industry-news/volvo/volvo-xc90-t8-claims-49gkm-co2-and-135mpg---with-401bhp/> (last visited Mar. 31, 2016).

¹⁸ M. Kane, "Volvo Spills Details On XC90 T8 Plug-In Hybrid SUV – Pricing Released, Order Books Open," available at <http://insideevs.com/volvo-spills-details-on-xc90-t8-plug-in-hybrid-suv-pricing-released-order-books-open/> (last visited Mar. 31, 2016).

32. As part of his purchase, Plaintiff paid Volvo \$700 for an electric charging station to charge the battery. Plaintiff also paid \$2,000 to electricians to install the Volvo charging station in his garage.

33. Plaintiff took delivery of his T8 on January 10, 2016. At that time, he paid the remainder of the balance due on the \$83,475 purchase price.

Actual Performance

34. Unfortunately, the T8's electric performance does not match Volvo's representations. Instead, Plaintiff has become a victim of a classic bait and switch.

35. Immediately after his purchase in January 2016, Plaintiff began to drive the T8. He was only able to get from 8-10 miles on a full electric charge—a far cry from the 25 mile-plus range repeatedly touted by Volvo.

36. As a result, Plaintiff went back to his Volvo dealer to analyze the problem. The Volvo dealer claimed that the electric range, per the window sticker on the T8 (which of course Plaintiff had no way of knowing about when he pre-ordered his T8), was 13 miles, not 25 miles. The Volvo dealer tested the T8 and was only able to achieve between 14-18 miles with the electric battery while driving the car on the highway, at no more than 40 mph, with all of the safety features, and the heat, turned off. Under normal driving conditions, the dealer was only able to obtain a 10 mile electric range.

37. Obtaining a 10 mile electric range rather than a 17 mile range means that only 58% of the promised range is actually achievable. And as compared to the 25 mile range Volvo represented the T8 would achieve, obtaining 10 miles is only 40% of the promised range.

38. To make matters worse, while only receiving 40%-58% of the promised range is significant, the practical ramifications for Plaintiff and the putative Class are more serious. Plaintiff

purchased the T8 both for the lessened environmental impact and the gas savings by being able to drive the T8 for local commutes and errands without the need to use gasoline. For such purposes, the difference between an 8-10 mile range and a 17-25 mile range is enormous, as for Plaintiff, and many others, gasoline is needed for an everyday commute, which is contrary to Volvo's promises concerning the electric battery range.

39. Plaintiff would not have paid a \$20,000 premium for the T8 hybrid engine, as compared to a fully gasoline-powered Volvo XC90, had he known that the actual electric range of the T8 was 8 to 10 miles.

40. Volvo is aware of Plaintiff's problems with the T8, but Volvo has refused to refund the price differential to Plaintiff. Accordingly, Plaintiff is entitled to either a refund for the entire purchase price, or damages for the amount of the diminished value of the T8.

V. CLASS ACTION ALLEGATIONS

41. Plaintiff brings Counts II, III and IV, as set forth below, on behalf of himself and as a class action, pursuant to the provisions of Rules 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure on behalf of a class defined as:

All individuals who purchased or leased a 2016 Volvo XC90 T8 (the "National Class").

Excluded from the National Class are Defendants, and their subsidiaries and affiliates; all persons who make a timely election to be excluded from the National Class; governmental entities; and the judge to whom this case is assigned and his/her immediate family. Plaintiff reserves the right to revise the Class definition based upon information learned through discovery.

42. Plaintiff brings Count I, as set forth below, on behalf of himself and as a class action, pursuant to the provisions of Rules 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure on behalf of a class defined as:

All individuals who purchased or leased a 2016 Volvo XC90 T8 in one of the Consumer Fraud States (the “Multistate Class”).¹⁹

Excluded from the Multistate Class are Defendants, and their subsidiaries and affiliates; all persons who make a timely election to be excluded from the Multistate Class; governmental entities; and the judge to whom this case is assigned and his/her immediate family. Plaintiff reserves the right to revise the Multistate Class definition based upon information learned through discovery.

43. Certification of Plaintiff’s claims for class-wide treatment is appropriate because Plaintiff can prove the elements of his claim on a class-wide basis using the same evidence as would be used to prove those elements in individual actions alleging the same claim.

44. **Numerosity – Federal Rule of Civil Procedure 23(a)(1).** The members of the Class are so numerous that individual joinder of all members of the Class is impracticable. To date, Volvo has sold over 600 T8 cars in the United States, and will likely sell thousands more. Thus, there are hundreds of consumers who have been damaged by Volvo’s conduct thus far, and thousands more will be damaged if Volvo is permitted to continue to make false representations. The precise number of Class members and their addresses is presently unknown to Plaintiff, but may be ascertained from Volvo’s books and records. Class members may be notified of the pendency of this action by recognized, Court-approved notice dissemination methods, which may include U.S. mail, electronic mail, Internet postings, and/or published notice.

45. **Commonality and Predominance – Federal Rule of Civil Procedure 23(a)(2) and 23(b)(3).** This action involves common questions of law and fact, which predominate over

¹⁹ The States in the Consumer Fraud Multistate Class are limited to those States with similar consumer fraud laws as applied to the facts of this case: California (Cal. Bus. & Prof. Code §17200, *et seq.*); Florida (Fla. Stat. §501.201, *et seq.*); Illinois (815 Ill. Comp. Stat. 502/1, *et seq.*); Massachusetts (Mass. Gen. Laws Ch. 93A, *et seq.*); Michigan (Mich. Comp. Laws §445.901, *et seq.*); Minnesota (Minn. Stat. §325F.67, *et seq.*); Missouri (Mo. Rev. Stat. 010, *et seq.*); New Jersey (N.J. Stat. §56:8-1, *et seq.*); New York (N.Y. Gen. Bus. Law §349, *et seq.*); and Washington (Wash. Rev. Code §19.86.010, *et seq.*).

any questions affecting individual Class members, including, without limitation:

- (a) Whether Volvo promised consumers that the T8 would be able to get 17 to 25 miles on an electric battery charge;
- (b) Whether Volvo informed various automobile publications that the T8 would be able to get from 17 to 25 miles on an electric charge;
- (c) Whether Volvo knew, or should have known, that the automobile publications to which it gave information about the T8 would publish that information and provide it to prospective customers;
- (d) Whether Volvo knew, or should have known, when it made representations concerning the electric battery range of the T8 that it was unlikely that any consumer would ever be able to achieve 25 miles, or even 17 miles, of electric range under normal driving conditions;
- (e) Whether Plaintiff and Class members have been injured and the proper measure of their losses as a result of those injuries; and
- (f) Whether Plaintiff and the other Class members are entitled to injunctive or declaratory relief, and the nature of such relief.

46. **Typicality – Federal Rule of Civil Procedure 23(a)(3).** Plaintiff's claims are typical of the claims of the other Class members because, among other things, all Class members were comparably injured through the uniform misconduct described above.

47. **Adequacy of Representation – Federal Rule of Civil Procedure 23(a)(4).** Plaintiff is an adequate Class representative because his respective interests do not conflict with the interests of the Class members he seeks to represent; he has retained counsel competent and experienced in complex commercial and class action litigation; and Plaintiff intends to prosecute this action vigorously. Class members' interests will be fairly and adequately protected by Plaintiff and his counsel.

48. **Declaratory and Injunctive Relief – Federal Rule of Civil Procedure 23(b)(2).** Volvo has acted or refused to act on grounds generally applicable to Plaintiff and the other Class members, thereby making appropriate final injunctive and declaratory relief, as described below.

49. **Superiority – Federal Rule of Civil Procedure 23(b)(3).** A class action is superior to any other available means for the fair and efficient adjudication of this controversy, and no unusual difficulties are likely to be encountered in the management of this class action. The damages or other financial detriment suffered by Plaintiff and the other Class members are relatively small compared to the burden and expense that would be required to individually litigate their claims against Defendants, so it would be impracticable for Class members to individually seek redress for Defendants' wrongful conduct. Even if Class members could afford individual litigation, the court system could not. Individualized litigation creates a potential for inconsistent or contradictory judgments, and increases the delay and expense to all parties and the court system. By contrast, the class action device presents far fewer management difficulties, and provides the benefits of single adjudication, economy of scale, and comprehensive supervision by a single court.

VI. CLAIMS ALLEGED

COUNT I

Violation of the Illinois Consumer Fraud Act (And Substantially Similar Laws of the Consumer Fraud States) (On Behalf of the Multistate Class)

50. Plaintiff incorporates paragraphs 1 through 49 as if fully set forth herein.

51. The consumer fraud statutes of the Consumer Fraud States, *supra* note 19, prohibit the use of unfair or deceptive acts or practices in the conduct of trade or commerce. The consumer fraud statutes are to be liberally construed.

52. Volvo engaged in the following unfair or deceptive acts or practices in the conduct of trade or commerce as described above, including:

- a. Volvo issued press releases that the T8 had an electric battery range of 25 miles, and stated that such a range would cover most drivers' daily driving experiences, when in fact the T8 has a real world range closer to 8 to 10 miles;
- b. Volvo represented, and continues to represent, on its website that the T8 had an electric battery range of 25 miles, and stated that such a range would cover most drivers' daily driving experiences, when in fact the T8 has a real world range closer to 8 to 10 miles;
- c. Volvo provided information to automobile publications, which it knew potential customers would read, that the T8 had an electric battery range of 25 miles, and stated that such a range would cover most drivers' daily driving experiences, when in fact the T8 has a real world range closer to 8 to 10 miles;
- d. Volvo knew or should have known that the electric battery range was not 25 miles, but rather was approximately 8-10 miles, in real world driving conditions.

53. Volvo intended for Plaintiff and the Class to rely upon its representations and promises concerning the electric battery range. Plaintiff and the Class did rely on Volvo's representations in purchasing the T8.

54. Volvo sold its products to the Class in trade or commerce within the United States and the Consumer Fraud States. And as it pertains directly to Plaintiff, Volvo sells its automobiles through dealers located in Illinois, it disseminated its representations (including those concerning the electric battery range) in Illinois, and it shipped its products to Illinois for delivery to Illinois residents.

55. As a result of Defendants' use or employment of the aforementioned unfair deceptive acts or practices, Plaintiff and each of the other members of the Class have sustained damages in an amount to be proven at trial.

56. Defendants' conduct showed malice, evil motive, or the reckless disregard for the rights of others such that an award of punitive damages is appropriate.

COUNT II
Common Law Fraud
(On Behalf of the National Class)

57. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 49 above as if fully set forth herein.

58. As described above, Defendants made false statements concerning the electric battery range of the T8 including:

- a. Volvo issued press releases that the T8 had an electric battery range of 25 miles, and stated that such a range would cover most drivers' daily driving experiences, when in fact the T8 has a real world range closer to 8 to 10 miles;
- b. Volvo represented, and continues to represent, on its website that the T8 had an electric battery range of 25 miles, and stated that such a range would cover most drivers' daily driving experiences, when in fact the T8 has a real world range closer to 8 to 10 miles;
- c. Volvo provided information to automobile publications, which it knew potential customers would read, that the T8 had an electric battery range of 25 miles, and stated that such a range would cover most drivers' daily driving experiences, when in fact the T8 has a real world range closer to 8 to 10 miles;

d. Volvo knew or should have known that the electric battery range was not 25 miles, but rather was approximately 8-10 miles, in real world driving conditions.

59. It was reasonable for Plaintiff and the Class to rely upon Defendants' statements.

60. Plaintiff and the Class relied upon Defendants' statements in ordering and purchasing the T8.

61. Defendants made representations concerning the electric battery range for the purpose of inducing Plaintiff and the Class to purchase the T8.

62. As a result of Defendants' statements, Plaintiff and each of the other members of the Class have sustained damages in an amount to be proven at trial.

63. Defendants' conduct showed malice, evil motive, or the reckless disregard for the rights of others such that an award of punitive damages is appropriate.

COUNT III
Breach of Express Warranty
(On Behalf of the National Class)

64. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 49 above as if fully set forth herein.

65. Volvo expressly warranted and guaranteed in its marketing and advertising materials, and in the materials it provided publications for reprint, as more fully described above, that the T8 had an electric battery range of 25 miles and that such range would allow most people, including Plaintiff, to drive daily solely on electricity.

66. Volvo expressly warranted the T8 in such a manner to the ultimate consumer, including Plaintiff and Class members. Indeed, Volvo's marketing and advertising materials were created specifically for the ultimate consumer and were intentionally disseminated in print and on the internet for the ultimate consumer's consumption.

67. Volvo's express warranty was a part of the basis of the bargain relating to Plaintiff's and Class members' purchase of the T8.

68. Plaintiff has performed all conditions precedent to Volvo's liability under the express warranty.

69. Volvo breached the express warranty by providing T8s to Plaintiff and Class members that do not achieve 25 miles of electric battery range in real world driving conditions.

70. As a result of Volvo's breach, Plaintiff and the Class have been damaged in an amount to be proven at trial, including but not limited to the premium paid for the T8 as compared to the price for a Volvo XC90 without an electric battery.

COUNT IV
Unjust Enrichment
(In the alternative to Count III)
(On Behalf of the National Class)

71. Plaintiff re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 49 above as if fully set forth herein.

72. Volvo sold the T8 to Plaintiff and Class members based on untrue and misleading advertising, including failure to disclose material facts, as stated more fully above. Specifically, Defendants represented that a customer could drive 25 miles solely using electricity without needing to use any gasoline.

73. By selling the T8 based on the untrue representations about the electric battery capacity, Volvo received a benefit from Plaintiff and Class members to which it was not entitled. In particular, Volvo received nearly \$20,000 in pricing premiums for every T8 sold as compared to a similarly equipped Volvo XC90 that did not contain an electric battery motor.

74. Volvo knowingly appreciated and accepted this benefit, which resulted and continues to result in an inequity to Plaintiff and Class members.

75. Volvo's retention of such benefit violates the fundamental principles of justice, equity, and good conscience.

76. As a result of Volvo's unjust enrichment, Plaintiff and Class members sustained damages in an amount to be determined at trial. Plaintiff seeks full disgorgement and restitution of Volvo's enrichment, benefits, and ill-gotten gains acquired as a result of the unlawful and/or wrongful conduct alleged herein.

VII. JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff demands a trial by jury of all claims in this Complaint so triable.

VIII. REQUEST FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of the other members of the Class proposed in this Complaint, respectfully requests that the Court enter an Order awarding the following relief:

- (a) Certifying this action as a class action; designating Plaintiff as Representative for the Class; and appointing the undersigned as Class Counsel;
- (b) Awarding compensatory and actual damages, including restitution and disgorgement of Defendants' revenues to Plaintiff and the other Class members generated from the unlawful practices set forth herein;
- (c) Enjoining Defendants from continuing the unlawful practices set forth herein;
- (d) Awarding attorneys' fees and costs to Plaintiff and the other members of the Class; and
- (e) Such other and further relief as the Court deems just and proper.

Dated: April 21, 2016

Respectfully submitted,

By: /s/ Todd L. McLawhorn

Joseph J. Siprut
jsiprut@siprut.com
Todd L. McLawhorn
tmclawhorn@siprut.com
John S. Marrese
jmarrese@siprut.com
SIPRUT PC
17 North State Street
Suite 1600
Chicago, Illinois 60602
Phone: 312.236.0000
Fax: 312.754.9616

***Attorneys For Plaintiff
And The Proposed Putative Class***

EXHIBIT 1



VOLVO CAR USA

Press Release

Date of issue **Oct 21, 2014 | ID: 153587**

The all-new Volvo XC90

The all-new Volvo XC90 is a visually striking, premium quality seven seat SUV with world leading safety features, new powertrain technologies, an unrivalled combination of power and fuel efficiency and a superlative interior finish.

The new XC90 marks the beginning of a new chapter in Volvo's history, capturing its future design direction, incorporating its own range of new technologies and utilising its new Scalable Product Architecture (SPA) technology.

The First Edition of the all-new Volvo XC90, 1,927 individually numbered cars only available for sale via digital commerce, sold out in 47 hours after it was released in early September 2014.



DESIGN

Volvo's new face

The new XC90 is the first Volvo to carry the company's new more prominent iron mark, which has the iconic arrow elegantly aligned with the diagonal slash across the grill. Together with the T-shaped "Thor's Hammer" DRL lights, the iron mark introduces an entirely new, distinctive and confident face for Volvo's forthcoming generation of cars.

The XC90's larger bonnet with its new topography, the beltline and the sharpened shoulders connecting with the tattoo-like, new rear lights are other important design signatures that will be mirrored across the range.

To add more visual muscle from the sides, the XC90 comes with a range of wheel sizes up to 22 inches.



Luxurious interior

The XC90's interior is the most luxurious to have been designed for a Volvo. The most striking feature is a tablet-like touch screen control console, which forms the heart of an all-new in-car control system. This system is virtually button free, a simplicity that opens up generous surfaces and gives us the opportunity to create a modern, luxurious interior architecture.

The all-new XC90 interior combines materials such as finest Nappa leather and wood with handcrafted details, including a gear lever made of crystal glass from Orrefors, the famous Swedish glassmaker, and diamond-cut controls for the start/stop button and volume control.



New trim level strategy

Volvo Cars' reinvented trim level strategy features the very competitive Momentum level.

Inscription and R-Design form the two branches on the tree. The Inscription package is designed for customers that want an elegant look and a luxurious experience, while R-Design has a sporty and dynamic aura.

In principle, the previous top level has been replaced with the Inscription and R-Design versions. Both of them feature an elevated content, carefully chosen to emphasise each of their distinctive individual personalities.

New seats

Volvo already enjoys a reputation for providing the most comfortable seats in the industry. The new XC90 enhances this reputation by offering innovatively designed seats that also free up interior space for passengers both in the second and third seat rows, helping to make the new XC90 a genuine 7-seater.

The full seat core has an ergonomic shape that resembles the human spine. A multitude of adjustment possibilities makes it possible for the individual user to create an ideal seating position. The new seats are available with adjustable side bolsters, seat cushion extension and massage.

The second row features three individual seats with recline adjustment. The sliding function can be used to create more legroom for the passengers in the third row – or to increase loading space. An integrated child booster

cushion in the centre seat is optional.

The seats in the third row offer class-leading comfort for passengers with a height up to 170 cm.

CHASSIS & POWER TRAINS

Completely new chassis

When it comes to driving dynamics, the XC90 gives the smooth, solid ride of a premium SUV combined with sharp handling and response. There is a completely new chassis, front and rear.

There are a double wishbone front suspension and a new integral link rear axle that also features a new transverse leaf spring, made of lightweight material. The XC90 can also be equipped with electronically controlled air suspension with a choice of five modes.

Unrivalled combination of power and fuel efficiency

The new XC90 offers a range of two-litre, four-cylinder Drive-E powertrains, all of which provide an outstanding combination of performance and fuel-efficiency.

The top of the range XC90 Twin Engine, which combines a supercharged and turbocharged petrol engine with an electric motor, offers an unrivalled combination of power and clean operation: around 400 horsepower with carbon dioxide (CO₂) emissions of 64 g/km (NEDC driving cycle).



Normal driving is conducted in the default hybrid mode. But at the push of a button the driver can switch to quiet and emission-free city driving on pure electric power where the range will be around 40 kilometres, and then, when needed, immediately revert back to the combined capacity of the petrol engine and electric motor. Combined maximum torque is over 600 Nm, making the XC90 accelerate from 0 to 100 in 6.4 seconds.

Full range of other engine options

The Volvo XC90 range also includes a T6 engine with supercharger and turbo with 320 hp and a maximum torque of 400 Nm.

All engine versions come with our 8-speed automatic gearbox as standard.

SENSUS

Most modern control system on the market

The new Sensus user interface is without doubt the most modern in-car control system on the market. It completely reinvents the way drivers operate their cars.

The traditional selection of buttons and controls has been replaced with a smooth, intuitive interaction between a large tablet-like touch screen, controls on the steering wheel and a capable voice-control system.

The digital instrumentation and the head-up display in front of the driver make sure that the most relevant information is available when needed.

Sensus gives comfortable access to a wide selection of cloud-based applications. The outstanding in-car possibilities includes Internet radio, connected navigation, finding and paying for parking, seamless music streaming, the ability to mirror and use Apple and Android devices in the touch screen display, a hot spot for using a tablet in the car – and much more.

Also – the XC90 will not only tell the driver when it's time for service, but also suggest an appointment at a Volvo dealership.

Digital craftsmanship

The groundbreaking digital craftsmanship, interaction design, is based on extensive discussions with customers. The layout on the portrait screen can be described as a stack of flexible 'tiles', each of them displaying a key functionality.

Information, navigation and media are high up and easy to check. Phone controls, application icons and climate controls are located low, comfortable to reach and touch.

When one of the tiles on the touch screen expands on interaction, the others are compressed but still visible and instantly accessible.

This makes the touch screen exceptionally user-friendly, with no need to go via a main menu when switching between functions.

Four-zone climate system

The all-new Volvo XC90 can be specified with a four-zone climate system with individual settings for the occupants in the front seats and in the second row. A separate air-conditioning unit for the third row is standard.

Volvo Cars' CleanZone air purification system, one of the most efficient on the market, has been further improved by adding a new carbon filter for more efficient capture of small, harmful particles and pollen in the incoming air.

One of the top audio systems in the world

The XC90 features one of the top audio systems available in the automotive world. The top-of-the-line system in the XC90 features a 1,400 W Class D amplifier and 19 Bowers & Wilkins speakers. It also includes one of the first air-ventilated subwoofers in a car. Integrated into the car body, it turns the whole interior space into a giant subwoofer.

The latest sound processing software has been used to manage the timing of the sound and co-ordination of the speakers. This brings the emotional experience of a world-class live performance into the car.

SAFETY AND SUPPORT

Most comprehensive standard safety package

The all-new XC90 offers the most comprehensive and technologically sophisticated standard safety package available in the automotive industry. It includes two world first safety technologies: a run-off road protection package and auto brake at intersection capability.

In a run-off road scenario, the all-new Volvo XC90 detects what is happening and the front safety belts are tightened to keep the occupants in position. To help prevent spine injuries, energy-absorbing functionality between the seat and seat frame cushions the vertical forces that can arise when the car encounters a hard landing in the terrain.

The XC90 is the first car in the world with technology that features automatic braking if the driver turns in front of an oncoming car. This is a common scenario at busy city crossings as well as on highways, where the speed limits are higher.

City Safety becomes the umbrella name for all of Volvo Cars' auto brake functions, which are standard equipment in the all-new XC90. It now covers vehicles, cyclists and pedestrians in front of the car, day and night.



Automatic support in queues

On the driver support side, the new Adaptive Cruise Control with Pilot Assist enables safe and comfortable semi-autonomous driving by automatically following the vehicle ahead in stop-and-go traffic. Acceleration, braking and

now also steering are controlled automatically.

Making sure that the driver remains in full control also when manoeuvring and reversing in tight spaces, the all-new XC90 features a 360° Surround view. It gives the driver a birds-eye view where information from all cameras are added up digitally to a one 360° image. The Park Assist Pilot now also offers automatic reversing into a parking bay.

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Volvo Car USA
Public Affairs
1 Volvo Drive
Rockleigh NJ 07647
United States
Phone: 1-800-970-0888
<https://www.media.volvocars.com/us>

Registered Office
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EXHIBIT 2



VOLVO CAR USA

Press Release

Date of issue **Dec 08, 2014 | ID: 154731**

Volvo Cars introduces Twin Engine technology in world's most powerful and cleanest SUV

The first Volvo designed from the ground up for plug-in/electrification compatibility, the XC90 T8 delivers all the performance of a luxury SUV, but with emission levels that even small hybrid cars struggle to match.

When designing the XC90 T8, Volvo Cars chose not to compromise on performance, driving pleasure, efficiency or even luggage space. By building on the new modular Scalable Product Architecture (SPA) platform and successful Drive-E petrol powertrain, the company has created a uniquely roomy 7-seater SUV that delivers 400hp/640Nm combined with ultra-low emissions (59g/km) and high fuel efficiency (2.5 l/100km). The fuel economy according to the U.S. driving cycle is 59 MPGe.

"The XC90 T8 is a plug-in electric car, hybrid car and high-performance car rolled into one," says Dr Peter Mertens, Senior Vice President Research and Development of Volvo Car Group. "The Drive-E engines already offer highly competitive performance versus the competition. The T8 takes it further into a leading position."

A driving mode for every need

The XC90 T8 can go from 0 to 100km/h (62 mph) in 5.9 seconds, delivering all the driving pleasure customers have come to expect from a Volvo SUV. But driving pleasure is only a fraction of what the XC90 T8 offers: the car has five different driving modes that deliver a range of performance and efficiency-enhancing characteristics. Using either a scroll wheel on the center console or a touchscreen on the dashboard, drivers can choose from:

Hybrid: This is the default mode, suitable for everyday use. Here, the vehicle will automatically alternate between drawing power from the 2-liter, 4-cylinder Drive-E engine and the electric motor to deliver the best overall fuel consumption.

Pure electric: In this mode, when the high-voltage battery is fully charged, it serves as the car's sole energy source, powering the electric motor over the rear axle. The XC90 T8 has a range of more than 40km using just electricity, which covers the total distance most people drive in one day. And thanks to the regenerative braking system, this mode is super-efficient in the stop-and-go traffic of city environments. If more power is needed, the Drive-E combustion engine starts up automatically.

Power mode: Here, drivers get the combined performance of the combustion engine and the electric motor. On start-up, the SUV takes advantage of the electric motor's superior response and instant torque curve, while the combustion engine gets up to speed. This combination offers better torque at lower revs, equivalent to that of a large displacement engine like the V8.

AWD: This mode offers constant all-wheel drive on demand. The advantage of being able to select AWD manually is that the driver can use it when needed, or choose to save energy for later.

Save: If the battery is charged, this mode allows the driver to "freeze" the battery level and save it for later use with Pure Electric drive. On the other hand, if the battery is low, the driver can use the combustion engine to charge the battery to a certain level for later use with Pure Electric drive.

Under the shell

Many of the XC90 T8's powertrain features have been optimized specifically for hybrid technology. Here are the main components of the system:

Drive-E engine

A specially modified version of the 4-cylinder Drive-E gasoline engine is under the hood. Already known for its ability to more efficiently deliver the power of an engine twice its size, the Drive-E engine is enhanced in the XC90 T8 by a supercharger and a turbocharger for a total power output of 318hp and 400Nm torque.

Automatic gearbox

The 8-speed automatic gearbox has also been specially adapted for the hybrid: shift-by-wire technology allows drivers to control the transmission electrically (a luxurious touch is the gearshift is made of handmade Swedish crystal). A larger oil pump provides the necessary lubrication during electric drive and enables quicker pressure build-up when seamlessly going from electric to combustion drive.

CISG

The crankshaft-mounted starter generator (CISG), located between the engine and the gearbox, performs three important functions: it is a powerful, 34kW starter motor that allows the car to go from pure electric drive to combination combustion drive seamlessly, so drivers can experience the car's petrol engine and electric motor as one unit; it is also a powerful electric generator; and finally, it acts as an electric engine booster, working with the supercharger and turbocharger when extra power is needed, providing up to 150 Nm of extra torque.

Battery

The high-voltage (270–400V) battery, delivering 65kW of power, is an excellent example of Volvo's success with the XC90 T8. While other carmakers have struggled to combine the bulk of a battery pack with a luxurious and spacious interior, Volvo has managed to overcome this challenge by placing the battery centrally in the tunnel of the car. There are several advantages to this position. For example, the battery does not impact the amount of available space inside the car. This means that there is room for three rows of seats – plenty of space for people and luggage. Furthermore, the battery placement gives the SUV a low and central center of gravity, making the XC90 T8 easier to handle and safer to drive.

Rear electric motor

Delivering 82hp (60kW) and 240Nm torque, the large electric motor sits on the rear axle and drives the back wheels in electric and power-boost modes. The rear placement is significant because it allows for a larger motor, which is useful for following stop-and-go city traffic rhythms. This placement also makes efficient all-wheel drive possible because each axle has its own power source.

Two-step braking system

The XC90 T8 blended braking system partly uses brake-by-wire technology to recover and transmit energy back into the car, either to recharge the battery or for immediate use. The system is also equipped with a unique stability function that controls the amount of energy that may be safely regenerated.

Unique cooling and climate system

The unique cooling system is composed of two extra circuits. The first cools the CISG and the large electric motor on the rear axle, while the second cools the battery in one of two ways: either passively, via the radiator, or actively through integration with the car's climate system.

Pre-conditioning

For convenience and efficiency, drivers can pre-condition the XC90 T8's drivetrain, battery and cabin, either directly from within the car or by using the Volvo On Call mobile app. This ensures that, whether it's freezing or hot and humid outside, the car will be heated or cooled as necessary and ready to go by the time the driver enters. Pre-conditioning can be done while the car is plugged in, which is beneficial from a CO₂ perspective since it ensures that the battery will last as long as possible in Pure Electric Drive mode.

A heritage of innovation

As the world's most powerful and cleanest SUV, the XC90 T8 joins a long list of Volvo Cars innovations designed to create a more comfortable driving experience, a cleaner environment and safer roads.

The data in the press release is based on the NEDC certification cycle used in the EU. The figures are preliminary.

Volvo Car Group in 2013

For the 2013 financial year, Volvo Car Group recorded an operating profit of 1,919 MSEK (66 MSEK in 2012). Revenue over the period amounted to 122,245 MSEK (124,547 MSEK), while net income amounted to 960 MSEK (-542 MSEK). Global retail sales for the year amounted to 427,840 (421,951) cars, an increase of 1.4 per cent compared to 2012. The operating profit was the result of cost control and strong sales and was further tangible proof of Volvo Car Group's progress in implementing its transformation plan. For the full year 2014, the company expects to stay in black figures and predicts to record a global sales increase of close to 10 per cent.

About Volvo Car Group

Volvo has been in operation since 1927. Today, Volvo Cars is one of the most well-known and respected car brands in the world with sales of 427,000 in 2013 in about 100 countries. Volvo Cars has been under the ownership of the Zhejiang Geely Holding (Geely Holding) of China since 2010. It formed part of the Swedish Volvo Group until

1999, when the company was bought by Ford Motor Company of the US. In 2010, Volvo Cars was acquired by Geely Holding.

As of December 2013, Volvo Cars had over 23,000 employees worldwide. Volvo Cars head office, product development, marketing and administration functions are mainly located in Gothenburg, Sweden. Volvo Cars head office for China is located in Shanghai. The company's main car production plants are located in Gothenburg (Sweden), Ghent (Belgium) and Chengdu (China), while engines are manufactured in Skövde (Sweden) and Zhangjiakou (China) and body components in Olofström (Sweden).

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Volvo Car USA
Public Affairs
1 Volvo Drive
Rockleigh NJ 07647
United States
Phone: 1-800-970-0888
<https://www.media.volvocars.com/us>

Registered Office
Göteborg, Sweden
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EXHIBIT 3



VOLVO CAR USA

Press Release

Date of issue **Apr 16, 2015 | ID: 161474**

Rockleigh, N.J. (April 14, 2015) – Volvo Cars will bring the world’s first seven passenger plug-in hybrid electric vehicle to the United States this summer with the XC90 T8 Twin Engine. Powered by Volvo’s 2.0 liter supercharged and turbocharged Drive-E engine and a rear axle electric motor, the T8 can achieve 394 horsepower and 0-60 MPH in just 5.7 seconds.

With uncompromising performance and flexibility, drivers can choose to operate the T8 in a variety of modes, including:

- **Hybrid:** As the default mode, it is suitable for everyday use and the XC90 will automatically alternate between drawing power from the 2.0 liter supercharged and turbocharged Drive-E engine and the electric motor to deliver the optimum overall fuel economy.
- **Pure electric:** This mode is used primarily in a city environment although it can power the car up to highway speeds. When the high-voltage battery is fully charged, it serves as the car’s sole energy source, powering the electric motor over the rear axle. Preliminary testing based on EPA criteria produced an estimated range of 17 miles using just electricity, which represents a high percentage of drivers’ typical daily usage.
- **Power mode:** This utilizes the combined performance of the combustion engine and the electric motor. On start-up, the XC90 T8 takes advantage of the electric motor’s superior response and instant torque curve, while the combustion engine gets up to speed. This combination offers better torque at lower revs, which is equivalent to that of a large displacement engine.

Because of the XC90 T8’s plug-in hybrid battery technology, consumers may be eligible for a federal tax credit up to an estimated \$4,600 in addition to other local and state incentives. T8 customers should consult a tax professional to determine eligibility.

The XC90 T8 combines the best of Scandinavian craftsmanship and style with uncompromising performance and interior enhancements. Each T8 features “Thor’s Hammer” LED headlights, power front seat cushion extensions, high level interior illumination and a hand blown Orrefors® crystal gear shift. The MSRP of the XC90 T8 Twin Engine Plug-In Hybrid Momentum is \$68,100, not including any tax credit incentives or \$995 destination charge.

The XC90 T8 Inscription provides an even higher level of luxury and elegance. Linear wood inlays, luxurious Nappa leather seats, dashboard and door panels provide the ultimate Scandinavian sanctuary for drivers and passengers. Rear exterior chrome accents and mirror covers accompany a unique, silver matte front grill. The MSRP of the XC90 T8 Twin Engine Plug-In Hybrid Inscription is \$71,600, not including any tax credit incentives or \$995 destination charge.

The XC90 T8 R-Design highlights the car’s sporty performance with external features including a piano black front grille, R-Design lower front spoiler, dual integrated tail pipes and matte silver mirror covers and window trim. A performance-focused interior design awaits drivers with Nubuck and Nappa leather contour seats, steering wheel gear shift paddles, a perforated leather gear shift and steering wheel. The MSRP of the XC90 T8 Twin Engine Plug-In Hybrid R-Design is \$70,000, not including any tax credit incentives or \$995 destination charge.

The XC90 has already received tremendous praise by customers and industry leaders. After winning this year's prestigious Red Dot "Best of the Best" Product Design Award, preorders approached 24,000 cars globally; this is approximately half of the first year's expected volume.

The XC90 T8 is expected to arrive at Volvo retailers in North America this fall, but test drives of the XC90 T6 will be available at Volvo retailers shortly.

Media Contacts

Jim Nichols
Product and Technology
Communications Manager
Volvo Car USA

Mobile: +1 201-220-6291
jim.nichols@volvocars.com

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Volvo Car USA
Public Affairs
1 Volvo Drive
Rockleigh NJ 07647
United States
Phone: 1-800-970-0888
<https://www.media.volvocars.com/us>

Registered Office
Göteborg, Sweden
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EXHIBIT 4



THE ALL-NEW
VOLVO XC90

EXPERIENCE OUR IDEA OF LUXURY.

The all-new Volvo XC90.

With its contemporary Scandinavian design and craftsmanship, the all-new XC90 redefines the luxury car for the 21st century. It is the safest, most advanced production car we have ever made; the most powerful and the most efficient.

It is a car designed for a demanding audience – you. Individuals who want an SUV that expresses who they are, and who want a vehicle that turns every drive into a memorable experience.

Every detail is designed to make driving more enjoyable and less stressful. Whether you're on your favorite country road or negotiating urban highway traffic, the all-new XC90's semi-autonomous driving technologies, first-class cabin, and attention to detail enhance your entire experience.

With the all-new XC90, we deliver on our promise to set the benchmark for luxury SUVs.







WE ARE VOLVO CARS.

We put people first.

We put people at the center of everything we do at Volvo Cars. Our design, our innovations, and our technologies are created to make life simpler and safer. Not just for you, but for your passengers and the world around you.

Scandinavian design begins by looking at who will use an object and then builds around that person and their needs.

It is a philosophy that we always use when designing our cars. Instead of trying to fit people around technology, we start by designing our cars around people.

In the all-new XC90, Scandinavian design, luxury, and technology converge to create the perfect experience for you and your passengers.



ROAD PRESENCE.

Be impressed, quite simply.

You know you're looking at truly great design when what appears simple at a first glance turns out to be ingenious and stimulating once you discover the thoughts and details that make up the whole. As with any luxury item, its beauty might be obvious but its true value is only revealed when you discover the expertise, the

craftsmanship and the passion that went into making it. The all-new XC90 has these qualities. It marks a new chapter in Volvo Cars' history and introduces a design language that combines a strong presence with subtle details. It is perfectly executed and contemporary, yet timeless.







YOUR SANCTUARY.

Where everyone travels first class.

With the interior of the all-new XC90, we have created a space that combines contemporary luxury with timeless seclusion. A haven where you and your passengers travel in first class, no matter where you sit. Each sculptured seat is sumptuously finished and beautifully designed, offering all the comfort you expect from a Volvo car, while ensuring generous legroom for rear passengers.

Designed in line with leading ergonomic research, the 10-way power front seats, including power lumbar support, ensure that you will easily find your perfect seated position. To enhance your comfort even further, you have the option of seat ventilation as

well as power-operated seat cushion extensions and side bolsters.

In the second row, the three individual seats are designed for maximum comfort. These seats slide and recline individually while the “theater seating” arrangement – where rear rows are positioned higher than the seats in front – give an excellent view forward.

Your younger passengers are equally important to us. Children who have outgrown child seats can use the integrated booster cushion in the second row. Also, every all-new XC90 has a large panoramic glass roof that perfectly complements the airy, uncluttered cabin.



Jewel-like treatments such as controls with diamond-patterned touch surfaces and translucent edges underline our designers' meticulous attention to detail.



Up to seven people ride comfortably in individual ergonomic seats. Each seat in the second and third rows can be folded flat into the floor, while 32 possible seating combinations provides superior versatility.



Thanks to the four-zone climate system, passengers in the outer two rear seats can set the temperature and fan speed to their individual taste – and the same goes for the driver and the front passenger.

LUXURY DYNAMICS.

Firm control with a velvet touch.

The advanced chassis of your all-new XC90 is tuned to deliver a smooth ride and precise handling. It results in a car that is just as comfortable and reassuring to drive on challenging roads as it is on the highway. Above all, you feel confident and in control behind the wheel. This makes the car easy to position on the road and effortless to maneuver, even in busy traffic situations and when negotiating tight parking spaces.

The all-new XC90 also incorporates our latest electronic support systems, which continuously adjust to road conditions and driving styles. For example, our Hill Start Assist function and Hill Descent Control make it easier to navigate steep inclines. All-wheel drive ensures that you make your way with total confidence in

unsettling weather conditions and on difficult roads.

For an ultra-smooth ride, the all-new XC90 is available with an air suspension system. This system includes advanced, electronically controlled dampers, which are connected to a computer that takes measurements and makes calculations up to 500 times a second, and adjusts the dampers accordingly.

The air suspension also allows you to raise or lower the car, making loading and unloading easier, as well as enhancing the all-new XC90's off-road capability. The Easy Ingress/Egress user setting, which is activated from the center touch screen, lowers the car by 1.57 inches when the engine is turned off. At higher speeds, the car lowers itself automatically to enhance stability.



Our optional air suspension technology offers you several dynamic chassis modes at the touch of an elegant drive mode selector: Comfort for maximum comfort, ECO for low fuel consumption, Dynamic for optimized aerodynamics and handling, and Off Road for increased ground clearance.

READ MORE AT VOLVOCARS.US





“The all-new XC90 puts you in control of advanced technology, in a way that’s human and natural.”

Intuitive technology to inform, entertain, and improve your driving experience.

An elegant 9-inch center touch screen display with a unique “portrait” orientation is central to the way the all-new XC90 makes your life simpler. It puts you in control of advanced technology, in a way that’s human and natural.

The information you need to see immediately, such as your current speed, road signs and navigation instructions, is right in front of you. This appears in the driver display or, if you have chosen the optional head-up display, hovering in your field of vision. Other critical information, such as 3D navigation maps and fuel levels, also appears in the driver display, while the rest of the functions are

located in the touch screen. This way you can stay focused on the road and enjoy the drive.

The touch screen’s portrait layout is a familiar one to anyone with a smartphone and gives you the optimum view of your current position and route ahead. We have replaced most of the physical buttons with one sleek control panel. Each function is organized in separate tiles and when activated, a tile expands to provide more detailed information. This enables access to the functions in one place, quickly and instinctively. No more complicated menus, just intuitive control.



Talk to me. To add to the relaxed driving experience, you can control many of the functions in your all-new XC90 using buttons integrated in the steering wheel, or through Voice Control technology. This enables you to use more natural voice commands and language, rather than a series of set prompts.

The beauty of information. With large touch buttons at the bottom of the screen, where they’re easy to reach, and information for viewing at the top, our tablet-sized 9-inch center display, with its portrait-format touch screen, is both innovative and practical. Its vertical format also makes following routes on maps easier as more of them can be displayed, and creates less need for scrolling.

READ MORE AT VOLVOCARS.US

SENSUS



SENSUS



Bowers & Wilkins

Premium Sound by Bowers & Wilkins - the perfect audio solution. By partnering with one of the world's most renowned high-end audio manufacturers, the all-new XC90's Premium Sound by Bowers & Wilkins delivers results, wherever you are seated. A total of 1400 watts is outputted from 19 speakers and the development of a new type of "open air" subwoofer, placed by the wheelarch, means it can pulse more air and enables extremely low bass tones. Each individual component is designed and acoustically optimized for the all-new XC90. We have also developed a unique room transformation technology that allows you to recreate the acoustics of a specific room inside your car.

Bowers & Wilkins is a trademark of B&W Group Ltd.

“Sensus is our way of enabling you to communicate instinctively with your car, and keeping you connected with your digital world.”

Connect to your car using all your senses.

Volvo Sensus is our way of enabling you to communicate instinctively with your car, and keeping you connected with your digital world.

Thanks to standard Sensus Connect, you can stream your favorite tunes from your device to your car via Bluetooth®. You can also use Bluetooth® or Wi-Fi tethering to connect your all-new XC90 to the internet via your device. This allows you to browse the web and access a variety of internet radio, navigation, and media

apps. With Sensus Navigation, you can view your route on the center display. Our smart navigation in-car apps further add to your convenience.

Whichever sound system you choose – High Performance Sound or the optional Premium Sound by Bowers & Wilkins – your musical experience will be exceptional.



Advanced touch control. The center display's highly advanced touch technology uses infrared film, giving you precise control with the barest touch of the screen – even when you are wearing gloves. Whether you push, sweep or pinch across the screen, you will be able to smoothly operate all functions with intuitive fingertip control. Anti-reflective coating minimizes reflections and glare, for optimum visibility in all light conditions.

The short way home. Sensus Navigation makes use of the 9-inch center display by showing your route in the largest possible format. With the optional head-up display, you will be guided by navigation arrows hovering in front of you. This is connected technology, so you have access to navigation apps that provide useful information. Best of all, Sensus Navigation has voice control, so all you have to do is say where you want to go.

READ MORE AT VOLVOCARS.US

INTELLISAFE

Light up the dark. Our "Hammer of Thor" LED lights combine a distinctive look with safety and convenience. These LED lights have an especially wide and long light pattern, and our Active High Beam technology allows you to stay on high beam all the time. Driving in the dark just became a lot more enjoyable and safe.

FIND OUT MORE AT VOLVOCARS.US

"Our vision is to design cars that will not crash."

Intuitive safety by Volvo Cars. For you, your passengers and those around you.

Since the birth of Volvo Cars in 1927, keeping you safe has been part of our DNA. The three-point safety belt, acknowledged as one of the most important innovations of mankind, is just one life-saving technology that we invented.

But we keep setting our sights higher. Our vision is to design cars that will not crash; in the short term our aim is that by 2020 no one should be killed or seriously injured in a new Volvo car.

IntelliSafe is our comprehensive approach to keeping you – and the people around you – safe. In the all-new XC90, our City Safety collision avoidance technology can help you avoid or mitigate collisions with other cars, pedestrians, and cyclists in your path. City Safety also includes another world-first from Volvo Cars, intersection braking. This technology deploys the all-new

XC90's brakes automatically, should you turn into the path of an oncoming car at an intersection, to help limit the impact of a collision or prevent it altogether. Standard IntelliSafe technologies also include preventive safety features such as Lane Departure Warning and Electronic Stability Control, while Road Sign Information alerts drivers in advance about changes in speed limit, speed cameras, and road signs.

You can build on this by adding the optional Vision Package, which is designed to warn you of hazards around your car. The optional Convenience Package ensures a relaxed drive in the city or on the highway. It will help you keep a safe distance from the car ahead and, if needed, avoid lane drift by gently steering you back to your lane.

INTELLISAFE



City Safety senses if you're about to collide with the car in front and applies the brakes if necessary. Active above 2.5mph, it can prevent a collision entirely at speeds up to 30mph. At higher speeds it can greatly reduce the severity of an impact. City Safety also brakes if you're about to turn into the path of an oncoming car, to avoid or mitigate a collision.

To protect those around you, City Safety watches out for pedestrians and cyclists, even at night. This is important because pedestrians and cyclists are harder to see in low light. Should a pedestrian or bike move into your path, City Safety warns you and will brake automatically if it senses that a collision is imminent.

The optional Vision Package includes our Blind Spot Information System, which alerts you to vehicles approaching alongside you. It also includes Rear Collision Mitigation, which detects vehicles approaching fast from behind. Cross Traffic Alert is also included – this feature makes it easier to reverse out of parking spaces by warning you of road users approaching on either side.





“Relax and let your Volvo car do the hard work for you”

Semi-autonomous driving by Volvo Cars.

For a safer and more convenient experience in city traffic.

Pilot Assist allows you to enjoy the benefits of semi-autonomous driving. This revolutionary feature ensures every journey is effortless, even when you're on congested city streets.

As part of the optional Convenience Package, Pilot Assist supports you by automatically adjusting the steering

to keep the car within its lane at speeds up to 30mph. Working in harmony with Adaptive Cruise Control, which adapts your speed to the vehicle in front, Pilot Assist allows you to relax and let your Volvo car do the hard work for you. All you need to do is keep your hands on the wheel.

INTELLISAFE



- Mild steel
- High strength steel
- Very high strength steel
- Extra high strength steel
- Ultra high strength steel
- Aluminum



We help protect what is important to you – by design.

Volvo Cars makes your life safer, with our active safety technology and by designing protective strength around the passenger compartment.

We pioneered the use of ultra-high strength steel in our body structure. In the all-new XC90, around 40% of the total body weight consists of this extremely tough material, but an intelligent structure needs to dissipate energy as well as resist it. This is why we strategically placed softer segments in different steel qualities, which act as front and rear crumple zones.

Our run-off-road protection technology senses if you are going to depart the road unexpectedly or be involved in a collision, and automatically tightens the front safety belts with two levels of force to keep you in a safe position. A safety world-first for Volvo Cars, it helps protect your spine if the car encounters rough terrain during an accident. We designed the front seat frames and seat cushions to help absorb severe vertical forces. If a collision is avoided, the front safety belts unroll again without needing to be serviced.



We designed the safety technologies to help protect people of all sizes and all ages. For example, children aged three years or over will ride in comfort and safely positioned when they are seated on our integrated booster cushion on the second row's center position.

At Volvo Cars we help protect not just you and your passengers, but other motorists too. We developed our lower crash structure so that the all-new XC90 is compatible with the crumple zones of smaller cars – because if you're big, you also have to be kind.

Our CleanZone technology filters out particles and harmful gases, ensuring that the air inside your car is clean even if you are driving through polluted areas. As part of CleanZone, we test all of our interiors to ensure that none of them emit any odors or harmful gases, taking care that all of our materials are hypo-allergenic. Then there's our newly developed cabin filter that greatly reduces the levels of dust, pollen, and particles entering the cabin. On top of this, our CleanZone interior air quality system has an active charcoal multi-filter that protects you and your passengers from harmful vehicle emissions, such as carbon monoxide, nitrous oxides, and diesel particles. The system also opens and closes the air vents automatically. It constantly measures the quality of the air entering the cabin and switches to recirculation mode if it detects harmful gases, opening the vents again when conditions have improved.

READ MORE AT VOLVOCARS.US





Park with confidence – wherever you go. Tight parking areas and narrow city streets can be easily maneuvered with the optional 360° camera. You will get a bird's-eye, uninterrupted view of the car's surroundings on the center display. If you would like your car to park for you, then let the optional Park Assist Pilot do the work and maneuver you into a vacant space. Not only can this technology parallel park, it can also handle perpendicular parking. Once it detects a suitable gap, it takes over the steering and guides your all-new XC90 into place – all you need to control is the brake and the accelerator. The technology is so precise it can park in spaces you would not normally consider. When parallel parking, for example, a space just 1.2 times the length of the car is enough. It is like having a valet to park your car for you, everywhere you go.

READ MORE AT VOLVOCARS.US

DRIVE-E



“Our all-new T6 powertrain gives you an exhilarating driving experience with smooth, instant response and reduced environmental impact.”

Efficient power, instant response and adaptability. The T6 AWD.

Our new lightweight Drive-E powertrains give you efficient power with a no-compromise driving experience. We believe they redefine how luxury cars will be powered in the 21st century.

The all-new supercharged and turbocharged four-cylinder T6 engine exemplifies this intelligent, all-embracing approach. It gives you an exhilarating driving experience with smooth, instant response at all revs – just the performance and driving enjoyment you'd expect from a luxury SUV. Yet thanks to our unrelenting commitment to efficiency, this superb driveability is combined with reduced environmental impact, low fuel consumption and less harmful emissions.

It is versatile too, allowing you to choose between drive modes for the engine, gearbox, and optional air suspension according to your preferences or the driving conditions. In Dynamic mode, you can enjoy a more sporty driving experience, with quicker responses. In Eco mode, the engine and gearbox are calibrated for the lowest possible fuel consumption. A start/stop system also helps to improve fuel efficiency.

To complete your driving experience, we have mated this 316hp /295 lb/ft powertrain with our all-new automatic eight-speed Geartronic[®] transmission, which ensures you get optimum performance and comfort at any speed.

“The all-new XC90 T8 Twin Engine feels truly special behind the wheel, allowing you to switch between 400hp AWD performance and pure electric driving at the touch of a button.”

Power without compromise. The T8 Twin Engine plug-in hybrid.

By combining a state-of-the-art Drive-E petrol engine with a powerful electric motor, the all-new XC90 T8 Twin Engine gives you thrilling performance and exceptional efficiency. Fully charged, the T8 Twin Engine provides 17 miles (estimated) of pure electric driving – sufficient to cover most commutes and other everyday scenarios. On those occasions when you require more power, the 313hp Drive-E powertrain starts automatically, whenever it is called upon.

The T8 Twin Engine is our range-topping model and feels truly special behind the wheel, allowing you to switch between 400hp AWD performance and pure electric driving at the touch of a button. With distinctive drive modes, including Pure Electric, Hybrid, and Power, it adapts to your every need. In fact, your all-new XC90 can be anything you want it to be – a silent-running pure electric city car, a smart plug-in-hybrid, a seven-seat SUV, or a high-performance luxury car, all without ever having to compromise.



Our T8 Twin Engine AWD plug-in hybrid makes every journey an event, combining the modern feel of zero-emission driving with astonishing performance. As well as its twin-charged, high-performance Drive-E petrol engine, the all-new XC90 T8 Twin Engine has a powerful electric motor, resulting in a combined output of 400hp and a 0-60mph time of 5.3 seconds (estimated). The powertrain switches smoothly between sources in hybrid mode. In electric mode it gives a near-silent driving experience.

The electric motor is powered by high-capacity batteries that are mounted centrally along the transmission tunnel – an intelligent positioning that gives excellent weight distribution and, consequently, outstanding handling. It also means that with the all-new XC90, Volvo Cars is the only manufacturer that offers a hybrid SUV with seven seats. As a symbol of the Pure electric mode, the gear shifter in traditional Swedish crystal is handmade for you by Orrefors™.

READ MORE AT VOLVOCARS.US



The choice is yours.

With three trim levels and a range of options and accessories, you can create the all-new XC90 that best fits your lifestyle and personality. Even the standard trim level, Momentum, is designed to meet the high levels of refinement that a luxury SUV owner demands. If you're aiming for top-of-the range luxury, the Inscription trim level focuses on craftsmanship, elegance and exclusiveness. Finally, the R-Design is all about a more sporty, dynamic expression of your SUV, both inside and out.

VOLVO XC90 MOMENTUM



Picture shows T6 Momentum with optional LED headlights.

- High-gloss black grille with glossy chrome frame
- Color-coordinated lower body moldings
- Black lower outer grilles with chrome deco strip
- Roof rails in matte anodized aluminum with Charcoal feet
- Side window frames with high-gloss chrome finish
- Matte Silver Bright metallic skid plate, dual integrated tailpipes, and "whiskers" around rear reflector in body color
- 19", 10-spoke Turbine, Silver Bright alloy wheels
- Cross-brushed aluminum inlays
- Comfort seats with leather upholstery



VOLVO XC90 R-DESIGN



- Horizontal mesh grille in high-gloss black paint, silk metal frame
- R-Design color-coordinated lower body moldings
- Dark grey lower outer grilles with high-gloss black insert
- Integrated roof rails in high-gloss anodized aluminum, flush with the roof
- Door mirror caps with semi-matte silver finish
- Side window frames with silk metal finish
- Dark grey skid plate with body-colored insert, dual integrated tailpipes, "whiskers" around rear reflector with high-gloss black finish
- 20" 5-spoke, Diamond Cut/Tech Matte Grey alloy wheels
- Metal mesh aluminum inlays
- Contour seats with Nubuck and Nappa leather upholstery



VOLVO XC90 INSCRIPTION



Picture shows optional 21" 8-spoke Alloy Wheels in Silver Bright Diamond Cut.

- Matte silver-colored grille with waterfall theme, glossy chrome frame
- Color-coordinated lower body moldings with high-gloss chrome strip and Inscription logo
- Black lower outer grilles with chrome deco strip
- Integrated roof rails in high-gloss anodized aluminum, flush with the roof
- Side window frames with high-gloss chrome finish
- Matte Silver Bright metallic skid plate, dual integrated tailpipes, "whiskers" around rear reflector with high-gloss chrome finish
- 20", 10-spoke, Diamond Cut/Tinted Silver alloy wheels
- Linear walnut wood inlays
- Comfort seats with perforated Nappa leather upholstery



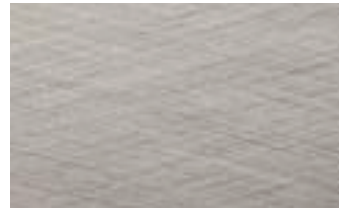
VOLVO XC90



Contour seat



Comfort seat



Cross-brushed aluminum
Momentum



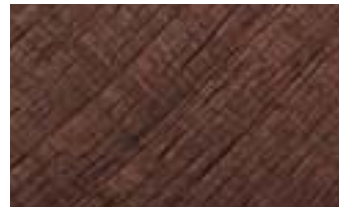
Dark flame birch
Optional for Momentum



Metal mesh
R-Design



Carbon fiber
Optional for R-Design



Linear walnut
Inscription

VOLVO XC90



RA00 | Charcoal leather



RA20 | Amber leather



RC00 | Charcoal perforated Nappa leather



RC20 | Amber perforated Nappa leather



RB01 | Charcoal Nappa leather with contour seat



RB21 | Amber Nappa leather with contour seat



UA00 | Blond leather in Blond/Charcoal interior



WA00 | Blond leather in blond interior



UC00 | Blond perforated Nappa leather in Blond/Charcoal interior



WC00 | Blond perforated nappa leather in blond interior



UB01 | Blond Nappa leather in Blond/Charcoal interior with contour seat



RB0R | Charcoal Nubuck and Nappa leather in Charcoal interior



XC90 T6 AWD

316 hp, 295 lb/ft torque, direct-injected turbo and supercharged engine,
8-speed Geartronic automatic with start/stop & Adaptive Shift

	Momentum	Inscription	R-Design		Momentum	Inscription	R-Design
Value:				Third-row seating (seven seats)	●	●	●
Complimentary Factory Scheduled Maintenance for 3 years, 36,000 miles. 4 years, 50,000 miles New Car Warranty.	●	●	●	Sensus Navigation	●	●	●
Safety				Volvo Sensus Connect with 9-inch touchscreen and six-month complimentary subscription	●	●	●
Volvo On Call includes: Convenience features – remote lock/unlock, Send to Car, vehicle tracking with six-month subscription	●	●	●	Voice control	●	●	●
Roll Stability Control	●	●	●	12.3-inch digital instrument display	●	●	●
City Safety collision avoidance, including pedestrian & cyclist detection (day and night)	●	●	●	High-performance 330-watt audio system with 10 speakers, 1 USB and AUX input	●	●	●
Run-off-road protection	●	●	●	Sirius™ satellite radio with six-month subscription	●	●	●
Lane Departure Warning	●	●	●	Four-zone electronic climate control	●	●	●
Road Sign Information	●	●	●	CleanZone air quality system	●	●	●
Driver Alert	●	●	●	Leather steering wheel	●	●	●
Exterior				Aluminum inlays	●	N/A	N/A
Laminated panoramic sunroof with power sunshade	●	●	●	Aluminum Volvo tread plates	●	N/A	N/A
19" 10-spoke Turbine alloy wheels in Silver Bright	●	N/A	N/A	Auto-dimming mirror	●	●	●
Adjustable drive mode settings	●	●	●	Versatility			
Aluminum roof rails	●	N/A	N/A	Keyless entry and drive	●	●	●
Dual integrated tailpipes	●	●	●	Rear park assist camera	●	●	●
LED fog lights with corner illumination	●	●	●	Hands-free power tailgate	●	●	●
High-gloss black front grille	●	N/A	●	Rear park assist	●	●	●
Tinted windows (rear & cargo)	●	●	●	Cargo cover	●	●	●
Door handle illumination	●	●	●	Cargo divider, upper cargo floor	●	●	●
Interior				Power-folding rear head restraints (outer positions)	●	●	●
Leather upholstery (seating surfaces)	●	N/A	N/A	Power child safety locks	●	●	●
10-way power front seats incl. power lumbar and driver seat memory	●	●	●	Tempa spare wheel, including jack kit	●	●	●
Heated front seats	●	●	●	Aluminum cargo scuff plate	●	●	●

	Momentum	Inscription	R-Design
Inscription & R-Design			
LED headlights with Active Bending Lights (ABL), Auto Highbeam (AHB) & Thor's Hammer daytime running lights	N/A	●	●
High-pressure headlight cleaners	N/A	●	●
Illuminated tread plates	N/A	●	●
Integrated aluminum roof rails	N/A	●	●
High-level interior illumination	N/A	●	●
Inscription features			
Silver Matte front grille	N/A	●	N/A
Lower door molding with Inscription logo	N/A	●	N/A
Chrome rear fascia accents	N/A	●	N/A
Inscription tailgate badge	N/A	●	N/A
20" 10-spoke Tinted Silver alloy wheels	N/A	●	N/A
Nappa leather upholstery	N/A	●	N/A
Nappa leather dashboard and upper door panels	N/A	●	N/A
Ventilated front seating	N/A	●	N/A
Power side support for front seats	N/A	●	N/A
Power cushion extension for front seats	N/A	●	N/A
Linear walnut wood inlays	N/A	●	N/A
Inscription mats, including cargo area	N/A	●	N/A
Nappa leather key fob, color-coordinated	N/A	●	N/A
Rear sun curtains for rear side doors	N/A	●	N/A
Inscription start-up sequence (digital display)	N/A	●	N/A

	Momentum	Inscription	R-Design
R-Design features			
R-Design lower front spoiler	N/A	N/A	●
R-Design front grille	N/A	N/A	●
R-Design pedals	N/A	N/A	●
R-Design silk metal window trim	N/A	N/A	●
R-Design dual integrated tailpipes	N/A	N/A	●
R-Design silk metal mirror covers	N/A	N/A	●
R-Design perforated leather gearshift knob	N/A	N/A	●
R-Design tailgate badge	N/A	N/A	●
R-Design 20" 5-spoke alloy wheels in Diamond Cut/Tech Matte Grey	N/A	N/A	●
R-Design nubuck/nappa leather contour seats	N/A	N/A	●
Power cushion extension for front seats	N/A	N/A	●
Metal mesh aluminum inlays	N/A	N/A	●
Illuminated tread plates, R-Design logo	N/A	N/A	●
R-Design perforated leather steering wheel	N/A	N/A	●
Steering wheel gear shift paddles	N/A	N/A	●
R-Design nappa leather key fob	N/A	N/A	●
Charcoal headlining	N/A	N/A	●
R-Design mats, front/rear	N/A	N/A	●
R-Design start-up sequence (digital display)	N/A	N/A	●

● = Standard N/A = Not available



XC90 T8 TWIN ENGINE AWD PLUG-IN HYBRID

313 hp, direct-injected turbo and supercharged engine with 87 hp electric motor, 8-speed Geartronic automatic with start/stop & Shift by Wire

	Momentum	Inscription	R-Design		Momentum	Inscription	R-Design
Value:				Interior			
Complimentary Factory Scheduled Maintenance for 3 years, 36,000 miles. 4 years, 50,000 miles New Car Warranty.	●	●	●	Crystal gear shift knob by Orrefors®	●	●	●
Safety				Illuminated sill plates	●	●	●
Volvo On Call includes: Convenience features – remote lock/unlock, Send to Car, vehicle tracking with six-month subscription	●	●	●	High-Level interior illumination	●	●	●
Roll Stability Control	●	●	●	Power cushion extension, front seats	●	●	●
City Safety collision avoidance, including pedestrian & cyclist detection (day and night)	●	●	●	Leather upholstery (seating surfaces)	●	N/A	N/A
Run-off-road protection	●	●	●	10-way power front seats incl. power lumbar and driver seat memory	●	●	●
Lane Departure Warning	●	●	●	Heated front seats	●	●	●
Road Sign Information	●	●	●	Third-row seating (seven seats)	●	●	●
Driver Alert	●	●	●	Sensus Navigation	●	●	●
Exterior				Volvo Sensus Connect with 9-inch touchscreen and six-month complimentary subscription	●	●	●
eAWD	●	●	●	Voice control	●	●	●
LED headlights with Active Bending Lights (ABL), Auto Highbeam (AHB) & Thor's Hammer daytime running lights	●	●	●	12.3-inch digital instrument display	●	●	●
High-pressure headlight cleaners	●	●	●	High-performance 330-watt audio system with 10 speakers, 1 USB and AUX input	●	●	●
Laminated panoramic sunroof with power sunshade	●	●	●	Sirius™ satellite radio with six-month subscription	●	●	●
19" 6-spoke Turbine alloy wheels in Silver Bright	●	N/A	N/A	Four-zone electronic climate control	●	●	●
Adjustable drive mode settings	●	●	●	CleanZone air quality system	●	●	●
Aluminum roof rails	●	N/A	N/A	Leather steering wheel	●	●	●
Dual integrated tailpipes	●	●	●	Aluminum inlays	●	N/A	N/A
High-gloss black front grille	●	N/A	●	Aluminum Volvo tread plates	●	N/A	N/A
Tinted windows (rear & cargo)	●	●	●	Auto-dimming mirror	●	●	●
Door handle illumination	●	●	●	Versatility			
				Keyless entry and drive	●	●	●
				Rear park assist camera	●	●	●
				Hands-free power tailgate	●	●	●

	Momentum	Inscription	R-Design
Rear park assist	●	●	●
Cargo cover	●	●	●
Cargo divider, upper cargo floor	●	●	●
Power-folding rear head restraints (outer positions)	●	●	●
Power child safety locks	●	●	●
Tire Repair Kit	●	●	●
Aluminum cargo scuff plate	●	●	●
LED headlights with Active Bending Lights (ABL), Auto Highbeam (AHB) & Thor's Hammer daytime running lights	●	●	●
High-pressure headlight cleaners	●	●	●
Illuminated tread plates	●	●	●
Integrated aluminum roof rails	N/A	●	●
High-level interior illumination	●	●	●
Inscription features			
Silver Matte front grille	N/A	●	N/A
Lower door molding with Inscription logo	N/A	●	N/A
Chrome rear fascia accents	N/A	●	N/A
Inscription tailgate badge	N/A	●	N/A
20" 10-spoke Tinted Silver alloy wheels	N/A	●	N/A
Nappa leather upholstery	N/A	●	N/A
Nappa leather dashboard and upper door panels	N/A	●	N/A
Ventilated front seating	N/A	●	N/A
Power side support for front seats	N/A	●	N/A
Power cushion extension for front seats	N/A	●	N/A
Linear walnut wood inlays	N/A	●	N/A
Inscription mats, including cargo area	N/A	●	N/A

	Momentum	Inscription	R-Design
Nappa leather key fob, color-coordinated	N/A	●	N/A
Rear sun curtains for rear side doors	N/A	●	N/A
Inscription start-up sequence (digital display)	N/A	●	N/A
R-Design features			
R-Design lower front spoiler	N/A	N/A	●
R-Design front grille	N/A	N/A	●
R-Design pedals	N/A	N/A	●
R-Design silk metal window trim	N/A	N/A	●
R-Design dual integrated tailpipes	N/A	N/A	●
R-Design silk metal mirror covers	N/A	N/A	●
R-Design perforated leather gearshift knob	N/A	N/A	●
R-Design tailgate badge	N/A	N/A	●
R-Design 20" 5-spoke alloy wheels in Diamond Cut/Tech Matte Grey	N/A	N/A	●
R-Design nubuck/nappa leather contour seats	N/A	N/A	●
Power cushion extension for front seats	N/A	N/A	●
Metal mesh aluminum inlays	N/A	N/A	●
Illuminated tread plates, R-Design logo	N/A	N/A	●
R-Design perforated leather steering wheel	N/A	N/A	●
Steering wheel gear shift paddles	N/A	N/A	●
R-Design nappa leather key fob	N/A	N/A	●
Charcoal headlining	N/A	N/A	●
R-Design mats, front/rear	N/A	N/A	●
R-Design start-up sequence (digital display)	N/A	N/A	●

● = Standard N/A = Not available

XC90 OPTIONAL PACKAGES:

SINGLE OPTIONS:

VISION PACKAGE

- Blind Spot Information System & Cross Traffic Alert
- 360° Surround View Camera
- Automatically Dimmed Inner & Exterior Mirrors
- Retractable Rear-view Mirrors

CLIMATE PACKAGE
(R-Design)

- Heated Rear Seats
- Heated Windscreen (NA with Head Up Display)
- Heated Washer Nozzles

CLIMATE PACKAGE
(Momentum & Inscription)

- Heated Rear Seats
- Heated Steering Wheel
- Heated Windscreen (NA with Head Up Display)
- Heated Washer Nozzles

CONVENIENCE PACKAGE

- Park Assist Pilot
- Front Park Assist
- Adaptive Cruise Control with Pilot Assist
- Lane Keeping Aid
- HomeLink™
- Compass (Interior Rearview Mirror)
- Grocery Bag Holder
- 12V Power Outlet, Cargo Area

MOMENTUM PLUS
(Only for T6 Momentum)

- LED Headlights with Active Bending Lights (ABL), Auto Highbeam (AHB) & Thor's Hammer DRL
- Headlight High Pressure Cleaning
- Dark Flame Birch Wood Inlays Illuminated Sill Plates
- Interior High level illumination

	Momentum	Inscription	R-Design
Metallic paint	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dark Flame Birch Wood Inlays	<input type="radio"/>		
Integrated, Center Booster Cushion, 2nd row	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Leather & Flame Birch Wood Steering Wheel	<input type="radio"/>		
Bowers & Wilkins Premium Sound System w/ CD Player (CD only for T6)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contour Seats in Nappa Leather	<input type="radio"/>		
Graphical Head-up Display (HUD)*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4-corner Air suspension with FOUR-C active chassis**	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Charcoal Headliner***	<input type="radio"/>	<input type="radio"/>	
Carbon Fiber Inlays			<input type="radio"/>
20" 10-spoke Tinted Silver Alloy Wheels (only for T8)	<input type="radio"/>		
20" 5-double spoke Alloy Wheels in Matte Tech Black/Diamond Cut (only for T6)	<input type="radio"/>		
21" 8-spoke Alloy Wheels in Silver Bright Diamond Cut (T6 and T8)		<input type="radio"/>	
22" 5-double spoke Alloy Wheels in Matte Black Diamond Cut (T6 and T8)			<input type="radio"/>

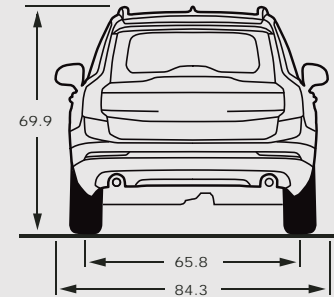
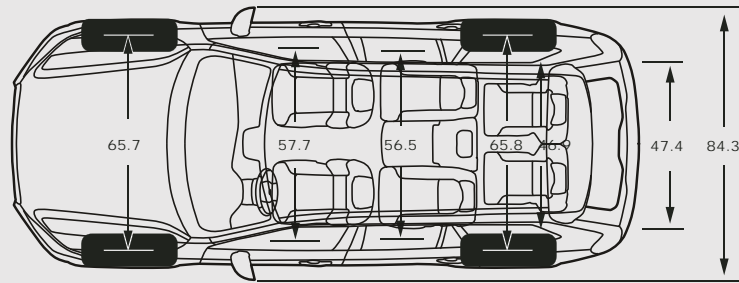
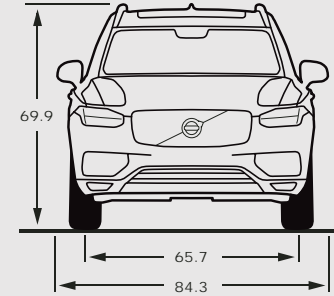
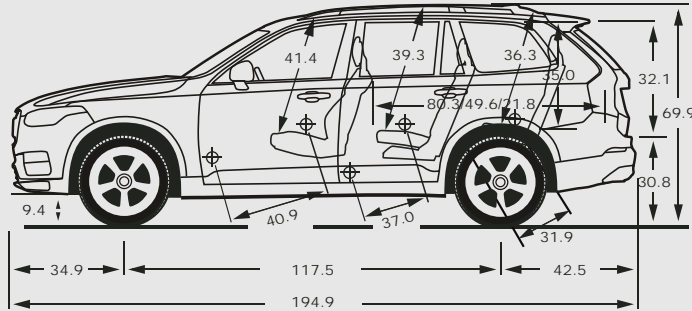
○ = Option

* Deletes heated windshield if Climate Package is ordered

** Requires Convenience Package

*** N/A with WA00, WC00, UA00, UC00 or UB01





	T6 AWD	T8 Twin Engine AWD plug-in hybrid
Engine type	2.0-liter petrol supercharged and turbocharged	2.0-liter petrol supercharged and turbocharged + electric motor
Transmission	Eight-speed Geartronic®	Eight-speed Geartronic®
Fuel consumption (mpg) highway/city	25/20	59 mpg e, city
Max power output (hp)	316	400 (313+87) combined
Max torque (lb/ft)	295	472 (295+177) combined
Fuel tank (gallon)	18.8	13.2
Environmental classification	California LEV III ULEV 125	PZEV

Please note: Some of the information in this brochure may be incorrect due to changes in product specifications that may have occurred since printing. Some of the equipment described or shown may now only be available at extra cost. Before ordering, please ask your Volvo Cars dealer for the latest information. The manufacturer reserves the right to make changes at any time and without notice to prices, colors, materials, specifications and models.

The most carefree way to own a car. Ever.

LEASING OPTIONS

FLEXIBLE TERMS

Leasing is available for terms as short as 24 months or up to 48 months. You can drive a new Volvo car every few years while within the manufacturer warranty and maintenance plans and without the burden of negotiating trade-in values.

CHOICE OF MILEAGE PLANS

The standard mileage option allows up to 15,000 miles per year, however, several other mileage plans are available to tailor to your commuting needs. Under the low mileage plan, options are available as low as 10,000 miles per year and we also offer a high mileage plan with options as high as 30,000 miles per year.

SINGLE PAYMENT LEASE

A single payment lease provides convenience and savings. You make only one payment, one time, freeing you from monthly payments. It permits you to prepay all monthly payments in a single payment at lease signing. This single total lease payment is less than the amount you would pay over the term of a conventional lease.

MULTIPLE SECURITY DEPOSIT LEASE*

A multiple security deposit lease allows you to place a lump sum refundable security deposit at lease inception, which reduces your monthly rent charge resulting in substantial savings over the term of the lease. The additional security deposits are refunded to you at the end of the lease term.

BUSINESS LEASE

Under our business lease option, owners have the flexibility to lease the vehicle as the business.

GUARANTEED AUTO PROTECTION (GAP) WAIVER

Our GAP Waiver is included in your lease agreement at no additional cost to you. It is provided to give you peace of mind. If your leased Volvo car is declared a total loss due to theft, accident, or natural disaster, we will cover the difference between the insurance proceeds and the balance owed to Volvo Car Financial Services less any deductible.

EXCESS WEAR AND USE PROTECTION PLAN*

As a part of everyday driving, normal wear and use can be expected. However, when turning in your leased vehicle, you may be responsible for any excess wear and use damage, therefore, Volvo Car Financial Services offers an optional plan to protect you and your car from unexpected occurrences that happen from nature and chance.

FINANCE OPTIONS

Volvo Car Financial Services (VCFS) offers affordable and competitive financing on new and Volvo Certified Pre-Owned cars. Our low rates and flexible terms can get you behind the wheel of the Volvo you want to drive with finance terms up to 75 months. Volvo Car Financial Services also offers financing on vehicles purchased under the Overseas Delivery Program.

*Please contact your local Volvo car retailer for detailed information on Volvo Car Financial Services Programs. Security Deposit Program is not available in NY. Excess Wear and Use Protection Plan is optional and not available in AK, GA, KS, NM, NY, TX, UT and VT.

SPECIAL PROGRAMS

EXPATRIATE PROGRAM

We welcome business professionals from countries outside the United States to finance or lease a Volvo car during their stay in the U.S. Contract length is limited to their length of stay as governed by the applicant's visa and employment contract. Subject to credit approval with Volvo Car Financial Services.

COLLEGE GRADUATE PROGRAM

You've worked hard to earn your degree. Now the Volvo Graduate Program can make it easy for you to drive a Volvo car. With flexible and competitive financing options available for graduates, Volvo Car Financial Services can help you to step into the luxury of driving a Volvo car with only a 5% down payment upon credit approval.

VOLVO MOBILITY PROGRAM

The goal of the Volvo Mobility Program is to assist persons with physical disabilities or hearing impairment. For those with exceptional transportation needs, this can be facilitated within the extraordinary comfort and safety of a specially adapted Volvo car. For additional information on this program, please contact **Mobility by Volvo Customer Care** at **(800) 480-9012**.

PERSONAL SHOPPER

The Volvo Personal Shopper is dedicated to providing you with a whole new level of shopping convenience. Whether you'd like help identifying the Volvo model that best fits your lifestyle, detailed information on any Volvo model, or a comparison against the competition, Volvo is there to help. We can arrange a Guest Drive for you at your nearest Volvo Retailer. So make the most of your shopping time and call the Volvo Personal Shopper at 1-800-550-5658.

VOLVO OVERSEAS DELIVERY PROGRAM

The Volvo Overseas Delivery Program offers a unique way to buy your new custom-built car as well as a unique way to see more of Europe. When you're done traveling, bring the pleasure of driving a Volvo car back home. Purchase any new Volvo car as part of the Volvo Overseas Delivery Program and enjoy all this, and more:

- Attractive pricing on U.S. models.
- Access to colors and certain features normally only available in Europe.
- 15 days of international insurance and temporary European registration included.
- Two complimentary round-trip tickets to Scandinavia (a peak season surcharge may apply).
- One free hotel night in Gothenburg, Sweden, the home of Volvo Cars.
- An exciting Volvo Cars factory tour or a visit to the new Volvo Brand Experience Center.
- An exclusive VIP delivery experience at the Volvo Cars Factory Delivery Center.
- The opportunity to explore Europe in the comfort and safety of your own Volvo car, either with one of our spectacular tours or on your own.
- Complimentary home shipment services. Just leave your car with us. We'll ship it to you the convenient way while you relax and enjoy your complimentary flight back home.

Can you think of a better way of traveling overseas and making your souvenir part of an unforgettable experience? If you would like to know more, contact your local Volvo car retailer, our Customer Care Center (800) 631-1667, or visit www.volvocars.us/mybagsarepacked www.facebook.com/volvooverseasdelivery

SERVICE AND WARRANTY

VOLVO ROADSIDE ASSISTANCE

Whenever you need us, we're just a phone call away. Our nationwide network of retailers and authorized service providers are ready to assist. Whether you require roadside assistance or maps and routing information for your next trip, refer to your Volvo Roadside Assistance card and dial **1-800-63-VOLVO** at any time. Your complimentary four-year membership activates the moment you become a Volvo owner. A connection to Volvo Roadside Assistance can also be made through our free app. Download it for iPhone or Android by typing Volvo Roadside Assistance/US through your app store.

VOLVO NEW CAR WARRANTY

Your new-car warranty provides comprehensive coverage for four years or 50,000 miles, whichever occurs first. Additional warranties cover corrosion, seat belts, the supplemental restraint system, hybrid components emission systems, genuine Volvo car replacement parts and genuine Volvo accessories. Should you encounter any problem with your Volvo car, simply contact the nearest retailer for assistance. Where your warranty ends, Volvo Increased Protection (VIP) plans begin. To purchase the additional protection of a VIP plan, contact your local retailer.

COMPLIMENTARY FACTORY SCHEDULED MAINTENANCE

Volvo Cars is committed to a premium ownership experience for its customers. To further enhance your ownership experience, all 2016 model year Volvo cars sold in the United States will include Complimentary Factory Scheduled Maintenance. This program provides scheduled maintenance coverage for the first three years or 36,000 miles, is designed to complement your Volvo warranty, and will help ensure trouble free operation of your Volvo. Coverage includes factory recommended maintenance including oil and filter changes, checks and adjustments as listed in your Warranty and Maintenance Records Information booklet, for the first three maintenance services at intervals of 10,000, 20,000 and 30,000 miles.

Service must be performed within 1,500 miles before or after each scheduled interval. Coverage is limited to scheduled maintenance items listed in the 2016 model year Warranty and Maintenance Records Information booklet. An authorized retailer must perform maintenance. Offer is transferable. Optional Factory Scheduled Maintenance program upgrades are also available that will allow you to customize coverage to meet your driving needs. See your Volvo retailer for details.

VOLVO SERVICE ADVANTAGE

- Complimentary software updates
- Complimentary vehicle diagnostics
- Alternate transportation
- Personal service contact
- Car wash
- Roadside assistance
- Lifetime replacement parts and labor warranty

For additional information:

www.volvocars.us/volvoserviceadvantage

VOLVO XC90

Momentum



19", 10-spoke Turbine,
Silver Bright, 172
(standard T6 Momentum)



19", 6-Spoke,
Turbine Silver Bright, 177
(standard T8 Momentum)



20", 5-double spoke,
Matte Tech Black/Diamond Cut, 234
(optional T6 Momentum)



20", 10-spoke,
Tinted Silver/Diamond Cut, 173
(standard T6 Inscription and optional T8 Momentum)

Inscription



20", 10-spoke,
Tinted Silver/Diamond Cut, 173
(standard T6 Inscription and optional T8 Momentum)



21", 8-spoke,
Silver Bright/Diamond Cut, 174
(optional T6 and T8 Inscription)



20", 5-spoke,
Matte Black/Diamond Cut
(standard T6 and T8 R-Design)



22", 6-double spoke,
Matte Tech Black/Diamond Cut, 175
(optional T6 and T8 R-Design)

R-Design

The exterior color you choose has a dramatic impact on the personality of your all-new XC90. Each color imbues the car with a sense of luxury and presence.



614
Ice White



707
Crystal White pearl metallic
(Also available for R-Design)



711
Bright Silver metallic



714
Osmium Grey metallic
(Also available for R-Design)



477
Electric Silver pearl metallic
(R-Design only)



720
Bursting Blue metallic
(R-Design only)



467
Magic Blue metallic



700
Twilight Bronze metallic



492
Savile Grey metallic



717
Onyx Black metallic
(Also available for R-Design)



487
Ember Black pearl metallic



719
Luminous Sand metallic



612
Passion Red
(R-Design only)

Please note: It is not possible to reproduce exact original shades in printed matter and on screen. Please ask your Volvo Cars dealer to show you samples.

V O L V O



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EXHIBIT 5



VOLVO CAR USA

Press Release

Date of issue **Apr 30, 2015 | ID: 161950**

Volvo XC90 T8 Twin Engine in a class of its own at 49 g/km CO2

- XC90 T8 Twin Engine is the world's most powerful and cleanest SUV
- Delivers 49 g/km CO2, combined 407 hp*, 640 Nm, just 2.1 l/100 km and 43 km pure electric range

The XC90 T8 Twin Engine has exceeded all expectations when it comes to the no compromise equation of power and low fuel consumption, coupled with world class low emissions – and all in a 7-seat luxury SUV.

The improvement over the earlier announced figures were achieved thanks to the continuous innovation cycle at the Swedish company. The result of further tuning is a drop of 10 g/km from the initial prognosis, bringing fuel consumption down to 2.1 l/100 km while also adding horsepower. This makes the XC90 T8 Twin Engine the clear leader in its segment, with an exceptional combination of low fuel consumption, emissions and pure power.

“We have been working hard to earn our competitive edge and to give our customers the ultimate combination of performance and low fuel consumption. Our Twin Engine technology has enabled us to build on our heritage of efficient powertrain development in a completely new way. Thanks to our new scalable product architecture, and our world class four-cylinder engines, we have a clear and leading position,” said Dr Peter Mertens, Senior Vice President Research & Development at Volvo Car Group.

No other SUV in this class can deliver 43 km of pure electric range, 0-100 km/h in 5.6 seconds and provide combined power of 407 hp – all in a 7 seat configuration.

The XC90 T8 Twin Engine will be available later this spring in Volvo showrooms.

Note to editors:

All figures are based on the NEDC driving cycle for hybrids.

* 320hp + 87 hp and 400 + 240 Nm combined 408hp and 640 Nm.

A driving mode for every need

The XC90 T8 Twin Engine can go from 0 to 100km/h in 5.6 seconds, delivering all the driving pleasure customers have come to expect from a Volvo SUV. But driving pleasure is only a fraction of what the XC90 T8 offers: the car has five different driving modes that deliver a range of performance and efficiency-enhancing characteristics. Using either a scroll wheel on the centre console or a touchscreen on the dashboard, drivers can choose from:

Hybrid: This is the default mode, suitable for everyday use. Here, the vehicle will automatically alternate between drawing power from the 2-litre, 4-cylinder Drive-E engine and the electric motor to deliver the best overall fuel consumption.

Pure electric: In this mode, when the high-voltage battery is fully charged, it serves as the car's sole energy source, powering the electric motor over the rear axle. The XC90 T8 has a range of more than 40km using just electricity, which covers the total distance many people drive in one day. And thanks to the regenerative braking system, this mode is super-efficient in the stop-and-go traffic of city environments. If more power is needed, the

Drive-E combustion engine starts up automatically.

Power mode: Here, drivers get the combined performance of the combustion engine and the electric motor. On start-up, the SUV takes advantage of the electric motor's superior response and instant torque curve, while the combustion engine gets up to speed. This combination offers better torque at lower revs, equivalent to that of a large displacement engine like the V8.

AWD: This mode offers constant all-wheel drive on demand. The advantage of being able to select AWD manually is that the driver can use it when needed, or choose to save energy for later.

Save: If the battery is charged, this mode allows the driver to "freeze" the battery level and save it for later use with Pure Electric drive. On the other hand, if the battery is low, the driver can use the combustion engine to charge the battery to a certain level for later use with Pure Electric drive.

Volvo Car Group in 2014

For the 2014 financial year, Volvo Car Group recorded an operating profit of 2,252 MSEK (1,919 MSEK in 2013). Revenue over the period amounted to 129,959 MSEK (122,245 MSEK). For the full year 2014, global sales reached a record 465,866 cars, an increase of 8.9 per cent versus 2013. The record sales and operating profit cleared the way for Volvo Car Group to continue investing in its global transformation plan.

About Volvo Car Group

Volvo has been in operation since 1927. Today, Volvo Cars is one of the most well-known and respected car brands in the world with sales of 465,866 in 2014 in about 100 countries. Volvo Cars has been under the ownership of the Zhejiang Geely Holding (Geely Holding) of China since 2010. It formed part of the Swedish Volvo Group until 1999, when the company was bought by Ford Motor Company of the US. In 2010, Volvo Cars was acquired by Geely Holding.

As of December 2014, Volvo Cars had over 25,000 employees worldwide. Volvo Cars head office, product development, marketing and administration functions are mainly located in Gothenburg, Sweden. Volvo Cars head office for China is located in Shanghai. The company's main car production plants are located in Gothenburg (Sweden), Ghent (Belgium) and Chengdu (China), while engines are manufactured in Skövde (Sweden) and Zhangjiakou (China) and body components in Olofström (Sweden).

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Volvo Car USA
Public Affairs
1 Volvo Drive
Rockleigh NJ 07647
United States
Phone: 1-800-970-0888
<https://www.media.volvocars.com/us>

Registered Office
Göteborg, Sweden
Registration No.
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Descriptions and facts in this press material relate to Volvo Car Group's international car range. Described features might be optional. Vehicle specifications may vary from one country to another and may be altered without prior notification.

EXHIBIT 6



VOLVO CAR USA

Press Release

Date of issue **Jan 21, 2016 | ID: 173034**

ROCKLEIGH, NJ (January 21, 2016) – The all-new Volvo XC90 T8 Twin Engine, the world's first seven passenger plug-in hybrid SUV, has been named Green Car Journal's 2016 Luxury Green Car of the Year.

The XC90 T8 offers a combined 400 horsepower by way of a two-liter turbocharged and supercharged gas engine in front and an electric motor at the rear. Together they deliver an EPA-rated 53 MPGe, making the all-wheel-drive XC90 T8 the world's most powerful and efficient SUV.

The luxury SUV has five different driving modes that deliver a range of performance and efficiency-enhancing characteristics. Using either a scroll wheel on the centre console or a touchscreen on the dashboard, drivers can choose from:

Hybrid: This is the default mode, suitable for everyday use. Here, the vehicle will automatically alternate between drawing power from the 2-litre, 4-cylinder Drive-E engine and the electric motor to deliver the best overall fuel consumption.

Pure: In this mode, when the high-voltage battery is fully charged, it serves as the car's sole energy source, powering the electric motor over the rear axle. The XC90 T8 has a range of more than 40km using just electricity, which covers the total distance many people drive in one day. And thanks to the regenerative braking system, this mode is super-efficient in the stop-and-go traffic of city environments. If more power is needed, the Drive-E combustion engine starts up automatically.

Power: Here, drivers get the combined performance of the combustion engine and the electric motor. On start-up, the SUV takes advantage of the electric motor's superior response and instant torque curve, while the combustion engine gets up to speed. This combination offers better torque at lower revs, equivalent to that of a large displacement engine like the V8.

AWD: This mode offers constant all-wheel drive on demand. The advantage of being able to select AWD manually is that the driver can use it when needed, or choose to save energy for later.

Save: If the battery is charged, this mode allows the driver to "freeze" the battery level and save it for later use with Pure Electric drive. On the other hand, if the battery is low, the driver can use the combustion engine to charge the battery to a certain level for later use with Pure Electric drive.

"It is an honor to receive this award from Green Car Journal for the XC90 T8," said Lex Kerssemakers, President and CEO, Volvo Car USA. "Volvo is committed to a vehicle electrification strategy that will make powerful and efficient plug-in hybrid powertrains available in more models, such as the S90 luxury sedan that goes on sale this year."

"The new Volvo XC90 T8 is a milestone luxury SUV offering the important features most desired by buyers who want it all," said Ron Cogan, editor and publisher of [Green Car Journal](http://www.greencarjournal.com) and CarsOfChange.com. "Its attractive new styling, welcome luxury appointments, seven passenger seating, and plug-in hybrid power deservedly earn its distinction as Green Car Journal's 2016 Luxury Green Car of the Year™. "

About Volvo Car USA

Volvo Car USA, LLC, (www.volvocars.com/us) is a subsidiary of Volvo Car Group of Gothenburg, Sweden. VCUSA provides marketing, sales, parts, service, technology and training support to Volvo automobile retailers in the United States. For more information please refer to the VCUSA media website at: <http://www.media.volvocars.com/us>.

Media Contacts

Jim Nichols
Product and Technology
Communications Manager
Volvo Car USA

Mobile: +1 201-220-6291
jim.nichols@volvocars.com

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Volvo Car USA
Public Affairs
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