

Modern Slavery Statement – UK

Cummins Reporting Entities:

- Cummins Ltd
- Cummins Power Generation Limited
- Cummins Generator Technologies Limited
- Cummins Electrified Power Europe Limited
- Meritor Heavy Vehicles Braking System (UK) Limited

Structure and Supply Chains

The Cummins Reporting Entities are indirect wholly owned subsidiaries of Cummins Inc., headquartered in Columbus, Indiana. Cummins Inc., founded in 1919, as a global technology leader, designing, manufacturing, distributing, and servicing a broad portfolio of clean power solutions. Cummins Inc.'s products range from diesel and natural gas engines to hybrid and electric platforms, as well as related technologies, including transmissions, battery systems, fuel systems, controls, air handling, emission solutions, and power generation systems. Cummins Inc. sells its products to original equipment manufacturers, distributors, dealers and other customers worldwide. Cummins Inc. serves its customers through a service network of approximately 650 wholly owned, joint venture and independent distributor locations and more than 19,000 Cummins certified dealer locations in approximately 190 countries and territories that comprise Cummins Inc.'s global distribution network.

Cummins Inc. employs approximately 69,600 people globally, including approximately 22,000 employees that are represented by various unions under collective bargaining agreements who are committed to powering a more prosperous world through three global responsibility priorities critical to healthy communities: education, environment, and equality of opportunity.

Cummins Ltd. is the primary, but not the only, UK operating company and is headquartered in Paddington, London. Cummins UK's presence includes operations in four manufacturing sites and an additional 10 other sites that are represented by various unions under collective bargaining agreements and customers across the UK and is comprised of a dedicated, professional team of around 5700 employees committed to ensuring an exceptional customer experience.

Meritor Heavy Vehicle Braking Systems (UK) Limited ("Meritor") headquartered in Cwmbran, Gwent provides a wide range of industry-leading drivetrain systems, including axles, brakes, suspensions, drivelines, and aftermarket parts, for the commercial vehicle and industrial markets. Meritor has a manufacturing site at this location comprised of dedicated, professional team of around 425 employees committed to ensuring an exceptional customer experience. Cummins Inc. acquired Meritor in 2022.

Policies on Modern Slavery

In March 2018, Cummins launched its Human Rights policy which prohibits the use of all forms of child labour and forced labour, including threat of force or penalty, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. The Human Rights policy was updated in March 2020 and last reviewed in March 2023.

Since September 2017, Cummins Inc. is a signatory to the United Nations Global Compact. Cummins supports the ten principles of the Global Compact to set higher standards in Cummins' Human Rights policy and our Code of Business Conduct reflect and further detail our company's commitment to human rights. Cummins' approach to counteract human right violations is also aligned with principles in OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises ("OECD Guidelines") and UN Guiding Principles on Business and Human Rights ("UNGP"). In our Code of Business Conduct, Cummins states: "We will embrace diverse perspectives and backgrounds and treat all people with dignity and respect." Our Code further states:

"We support human rights around the world and will comply with all applicable laws regarding the treatment of our employees and other stakeholders. We will not tolerate child or forced labour anywhere and we will not do business with any company that does. Our commitment to fair treatment and human rights also extends to our joint ventures, suppliers, and other partners. We will insist our suppliers and partners treat their stakeholders in a way that is consistent with our values through Cummins Supplier Code of Conduct (SCoC)."

Additionally, through our SCoC, Cummins ensures our suppliers and partners understand our values and treat their employees and business partners in a way that is consistent with those values. The SCoC states:

"Suppliers must not use slavery or involuntary labour of any kind, including prison labour, debt bondage, or forced labour by governments and suppliers must not be involved in human trafficking. Suppliers must not use corporal punishment, physical or psychological abuse, threats or violence, or other forms of physical or mental coercion. There must not be unreasonable restrictions on the ability of employees to enter or exit the workplace."

Meritor requires all its production suppliers to certify their compliance with all applicable local laws against human trafficking and slavery, will require a similar certification by all its new suppliers and will periodically update its supplier certifications. In addition, it will audit any supplier which it has reason to believe may be engaged in any activity that would violate applicable laws against human trafficking and slavery to ensure compliance with these laws.

Following its acquisition by Cummins, Meritor continues to align its policies to that of Cummins and it remains an ongoing process.

Speak UP

Cummins is committed to conducting its business honestly, ethically, and in compliance with all applicable laws and regulations. As part of this commitment, Cummins encourages its Employees and third parties to “Speak Up” and report any actual or suspected violations of law or company policy, or any other ethical concerns that do not align with our culture of compliance. Speaking up in good faith about actual or suspected violations of company policy demonstrates a dedication to our values, including integrity and continuous improvement, as well as a commitment to upholding Cummins’ longstanding reputation of having a strong compliant culture and workplace.

Reporting Process

Employees and third parties can submit good faith Speak Up Concerns through the **Cummins Ethics Help Line**. If a Speak Up Concern is raised anonymously, we will make every effort to keep the reporter identity confidential. Anonymous reporting (if permitted in the country where the individual is located) is possible when using **Cummins Ethics Help Line**. The Ethics Help Line is available 24/7.

Due Diligence Processes and Risk Assessment

Since 2019, Cummins has taken steps to assess and mitigate potential risks of Forced Labor or Child Labor in our operations and supply chains with a focus on suppliers we engage in our UK business.

In 2024, as part of Cummins' ongoing efforts to fight the presence of child and forced labour in supply chains, Cummins, among other things:

- Developed a communication plan for Procurement
- Implemented weekly team meetings between Procurement, Supply Chain, Legal, Trade Compliance and Meritor
- Engaged a third party to conduct a supply chain analysis
- Developed a Category Risk Segmentation for Supply Chain Mapping Prioritization
- Updated its contractual terms in its Master Services Agreements
- Released the Supplier Forced Labour Policy
- Provided internal training on child and forced labour in supply chains and
- Published the Supplier Forced Labour Prevention Policy.

Cummins identified UK-based suppliers that may pose human rights risks, particularly those providing labor-related services such as catering, cleaning, security, and logistics. These suppliers are expected to comply with SCoC.

Cummins confirms that targeted suppliers certify compliance with the Cummins SCoC.

Cummins requires suppliers that make up the top 80% of procurement spend to sign the SCoC Response form or a contract that contains language from the SCoC, which requires suppliers to comply with applicable laws and regulations and includes prohibiting the use of child or forced labour of any kind.

To verify that suppliers remain in compliance with the Supplier Code, Cummins conducts global supplier audits. The informal audit is conducted by Cummins personnel and the supplier is not notified before or during the audit. Cummins management will contact the supplier's management to inform them of all negative audit scores and Cummins will develop a corrective action plan with the supplier. If any inappropriate behaviours or conditions are observed during the audit, the situation is reviewed with the Cummins legal department for appropriate action.

Cummins will continuously improve by evaluating processes to identify suppliers which present human rights violation risks.

In May 2023, Cummins released a new Supplier Forced Labour Prevention Policy requiring supply partners to provide full supply chain transparency as requested by tracing the supply chain from raw materials to the parts they provide to Cummins. Suppliers are required to provide information such as: a detailed description of their supply chain; the role(s) of the entities in the supply chain (including shippers and exporters); a list of suppliers associated with each step of the production process, including names and contact information; and affidavits from each entity involved in the production process.

Additionally, Cummins requires all suppliers to immediately notify Cummins if it becomes aware of a stopped shipment for any of the supplier's customers, where the shipment was stopped for concerns relating to forced labour.

Cummins will investigate any indications that a supplier is engaging in Forced Labor or is not complying with this policy. Cummins will suspend any new business with suppliers during an investigation.

Potential Risks in Our Operations

Cummins considers the risk of child and forced labour occurring within the Cummins Reporting Entities operations to be low considering our workforce and Cummins' robust policies and procedures that govern recruitment / labour sourcing, working conditions and the ethical treatment of our employees.

From a geographical risk perspective, our employees operate in the UK, Ireland, Poland and the Netherlands, which have low prevalence of child and forced labour, a low risk of vulnerability to child and forced labour and a fairly robust governmental response addressing child and forced labour¹. Moreover, our workforce primarily consists of skilled, qualified, and experienced individuals.

Potential Risks in Our Supply Chain

¹ Walk Free, Global Slavery Index 2024, found [here](#)

We recognize that the risk of modern slavery is higher within our supply chains than in our operations. We understand that particular regions, products and raw materials carry a higher risk of child and forced labour because of the prevalence of child and forced labour in particular countries. There are also risks linked to certain industries even in countries considered to have lower risks of child and forced labour. Accordingly, our supply chains are subject to assessment for risks of child and forced labour by Cummins Inc.'s Global Supply Risk team. These assessments consider a combination several factors including category, industry, country, and supplier management risk profiles.

Based on our assessment of our operations and supply chains as it relates to the risk of forced labour or child labour being used, we did not identify any instances of child or forced labour. Accordingly, no steps were required to remediate child or forced labour, or the loss of income associated with remediation efforts.

Measuring Effectiveness

In collaboration with Cummins Inc., we are continually working to further develop and protect our commitment to doing business ethically. To measure the effectiveness of the work in this area, targeted suppliers are confirmed to have certified compliance with the Cummins Supplier Code and informal audits are conducted on suppliers globally to verify that suppliers remain in compliance with the Supplier Code. We intend to seek continuous improvement by planning to evaluate processes to identify suppliers which present human rights violation risks.

Throughout 2024:

100% of the top 80% of suppliers who make up the highest spend were required to certify their intent to comply with the Supplier Code.

- 100% of salaried and exempt employees completed their ethics certification.
- Cummins Inc.'s Procurement department is required to take Human Rights Training.

In 2025, we intend to continue to track the above metrics. We also periodically review our policies and procedures to continue to evaluate their effectiveness.


Training for Staff


Cummins Inc. launched an online training package to support the launch of the Human Rights Policy in 2019, which specifically addressed Human Rights and Modern Slavery. In 2022, the Human Rights training was updated and relaunched. This online training applies to the Cummins Reporting Entities and is available for all employees; however, it is mandatory training for the following functions: Legal, Internal Audit, Ethics and Compliance, and Supply Chain, Planning, Purchasing, Manufacturing, Logistics, Health and Safety, and Quality.


The objectives of the training include being able to identify red flags of potential human rights violations, understand the importance of conducting due diligence for third parties in Cummins' supply chain and how to report potential human rights violations.


Additionally, we require employees to comply with, and have training on, the Cummins Code of Business Conduct, which includes provisions prohibiting forced or child labour.

This statement is (i) made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the company's slavery and human trafficking statement for the fiscal year ending 31st December 2024 and (ii) approved by relevant director(s) of Cummins Ltd., Cummins Power Generation Limited, Cummins Generator Technologies Limited and Cummins Electrified Power Europe Limited on 25 June 2025.


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Date: 30 June 2025

This statement is (i) made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the fiscal year ending 31st December 2024 and (ii) approved by the directors of Meritor Heavy Vehicle Braking Systems (UK) Limited on 30 June 2025.


Huw D James
Director
Meritor Heavy Vehicle Braking Systems (UK) Limited

Date: 30 June 2025












Modern Slavery Act statement 2024

Final Audit Report

2025-06-30

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