Specific United Kingdom Disclosures:

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, filtration, 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 460 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 73,600 people globally, including approximately 23,400 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 presence is comprised of four manufacturing sites and an additional 17 associated sites which include parts reconditioning, distribution, and administration, to 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 that 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 475 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, prison labour, 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 is in the process of aligning its policies to that of Cummins.

Due Diligence Processes and Risk Assessment

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. 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 2023, as part of Cummins' ongoing efforts to fight the presence of child and forced labor 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; and
- Published the Supplier Forced Labour Prevention Policy.

Identification of UK-based suppliers that may pose human-rights related risks. These include suppliers that provide labour-related services to Cummins' entities located in the UK. Examples include but are not limited to catering, cleaning, security, and logistics services.

Cummins expects our suppliers especially those that may pose human-rights related risk to comply with its SCoC.

Human-rights related risk suppliers are included as part of a supplier annual review to ensure compliance with the SCoC.

Measuring Effectiveness

Cummins measures its effectiveness by confirming 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 associate 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.

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. In 2023, 99% of individuals in Cummins & Meritor Procurement department completed Human Rights Training.

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 company's slavery and human trafficking statement for the fiscal year ending 31st December 2023 and (ii) approved and signed by relevant director(s) of Cummins Ltd., Cummins Power Generation Limited and Cummins Generator Technologies Limited on 25th June 2024.

desmond mcmenamin
desmond mcmenamin (Jun 25, 2024 16:35 GMT+1)

Desmond McMenamin
Director

Date: _____

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 2023 and (ii) approved and signed by the directors of Meritor Heavy Vehicle Braking Systems (UK) Limited on 27th June 2024.



Huw D James
Director

Date: _____

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