



Supplier Forced Labor Prevention Policy

Supply Chain – Global Procurement



Scope

This policy applies to all suppliers and sub-tier suppliers of products and services to Cummins. For the purpose of this document, Cummins shall mean and include Cummins Inc., its affiliates, including without limitation its joint ventures, subsidiaries, and distributors.

Policy

Cummins Inc. is a global company with a long history of respecting human rights for all people. Respect for human rights is fundamental to the sustainability of Cummins, our customers, and the communities in which we operate. Cummins is committed to ensuring that people are treated with dignity and respect.

This is a global policy that affects the entire supply chain including raw material suppliers. This policy shall provide Cummins suppliers and Cummins Supply Chain with an understanding of Cummins' requirement that all Suppliers comply with all applicable Force Labor laws / regulations and provide documentation, to include Supply Chain mapping, as requested.

Cummins takes Forced Labor and Child Labor issues very seriously and is a member of the United Nations Global Compact. Cummins conducts due diligence consistent with international human rights principles related to Forced Labor and Child Labor as encompassed in the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

1. Cummins prohibits all forms of Forced Labor and Child Labor.

The various forms of Forced Labor and Child Labor are herein collectively referred to as "**Forced Labor**" including but not limited to the following:

- [Threat of Force or Penalty](#)
- Prison labor
- Indentured labor
- [Bonded Labor](#)
- Military labor
- Slave labor
- Any form of Human Trafficking

2. Cummins does not tolerate any form of Forced Labor and requires its Suppliers to comply with all applicable international laws and regulations.

These laws include but are not limited to the following:

- United States [Uyghur Forced Labor Prevention Act \(UFLPA\)](#)
- United States [UFLPA Entity List](#)
- United States [The California Transparency in Supply Chains Act](#)
- United Kingdom [The Modern Slavery Act 2015](#)
- Germany [The Lieferkettengesetz / Supply Chain Act](#)
- Norway [The Norwegian Transparency Act \(Åpenhetsloven\)](#)
- France The Duty of Vigilance Law
- Australia The Modern Slavery Act 2018

3. Cummins will take steps to ensure our suppliers and partners adopt relevant measures to mitigate Forced Labor risks.

Cummins is committed to supply chain transparency and due diligence.

Global laws and regulations require Cummins to have full transparency of its value chains from raw materials to finished goods. Cummins requires our supply partners to provide full supply chain transparency and mapping upon request, to include all sub-tier information.

Cummins requires suppliers to certify to their compliance with Cummins Supplier Code of Conduct and applicable global laws and regulations, including but not limited to the list below:

- [United Nations Guiding Principles on Business and Human Rights](#)
- [Universal Declaration of Human Rights](#)
- [United Nations Global Compact](#)
- [US Department of Labor - List of Goods Produced by Child Labor or Forced Labor](#)
- [Organization for Economic Co-operation and Development \(OECD\) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas](#)
- [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [Cummins Supplier Code of Conduct](#)
- [Cummins Transparency in Supply Chain](#)
- [Cummins Human Rights Statement](#)
- [Cummins Supplier Portal](#)
- [Additional Cummins Policies \(supplier login require\)](#)

Violation and Investigations

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. In addition, Cummins will require any supplier being investigated to provide part supply chain mapping back to the raw material supplier for all current parts or products.

Failure to provide this supply chain mapping or a violation of this policy will result in loss of business, termination of a contract and/or removal as a Cummins supplier.

Contact For More Information

For questions or concerns relating to this policy or to report possible violations, suppliers can seek assistance by contacting their Cummins procurement contact or emailing ethicsandcompliance@cummins.com or legal.function@cummins.com.

For questions or concerns relating to this policy or to report possible violations, employees can seek assistance by contacting:

- [The Cummins Legal Function](#)
- [Ethics and Compliance Function](#)
- [Human Resources](#)
- [Ethics.cummins.com](http://ethics.cummins.com)

You can externally report trafficking concerns to resources not managed by Cummins.

If you believe you have information about a potential trafficking situation or would like to request information, you may contact:

1. National Human Trafficking Resource Center (NHTRC) via
 - a. Toll-free hotline at 1-888-373-7888, or
 - b. Online using the anonymous [reporting forms](#)
2. Global Human Trafficking via
 - a. Hotline at 1-844-888-FREE or
 - b. Email at help@befree.org

Initial Release Date	Last Updated	Owner	Responsible Function
May 31, 2023	May 31, 2023	Procurement & Digital Procurement CoE	Global Procurement

Supply Chain Tracing Requirement

Supply Chain Tracing Information Documentation details tracing the supply chain from raw materials to the imported good. This following documentation is required under our Purchase order Terms & Conditions to be compliant with law and regulation.

Evidence Pertaining to Overall Supply Chain

1. Detailed description of supply chain including imported merchandise and components thereof, including all stages of mining, production, or manufacturer.
2. The role(s) of the entities in the supply chain, including shippers and exporters: for example, CBP will need to determine whether a supplier is also a manufacturer.
3. A list of suppliers associated with each step of the production process, including names and contact information (addresses, email addresses, and phone number).
4. Affidavits from each company or entity involved in the production process.

Evidence listed 1 through 4 is required of all sub tiers in your Supply chain including raw material suppliers. While completing the above evidence requirements utilize the check list below for each sub tier supplier.

Check list

- Purchase orders.
- Invoice for all suppliers and sub-suppliers.
- Packing list.
- Bill of materials.
- Certificates of origin.
- Payment records.
- Seller's inventory records, including dock/warehouse receipts.
- Shipping records, including manifests, bills of lading (e.g., airway/vessel/trucking).
- Buyer's inventory records, including dock/warehouse receipts.
- Invoices and receipts for all suppliers and sub-suppliers.
- Import/export records.