

Cummins Norway AS (“Cummins Norway”) is a trading company. The company has its head office in Ås. The company’s business idea and strategy is to be a leader in the sale and service of diesel engines and accessories.

The ultimate parent company of Cummins Norway AS is Cummins Inc, headquartered in Indiana, United States. Cummins Inc (“Cummins”) and its subsidiaries design, manufacture, sell and service diesel engines and related technology worldwide. Cummins serves its customers through its network of 600 self-owned companies, and independent distributors and more than 6,000 dealers in over 190 countries and territories.

Cummins Norway’s sales revenues come substantially from the marine sector. The company has 10 employees.

Cummins is a signatory to the UN Global Compact and its underlying principles on human rights, labour rights, environmental and anti-corruption. Cummins’ approach to counteract human right violations is also aligned with principles in OECD Guidelines for Multinational Enterprises (“OECD Guidelines”) and UN Guiding Principles on Business and Human Rights (“UNGP”).

In March 2018, Cummins launched its Human Rights policy which applies to Cummins entities worldwide. The policy 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.

Cummins has a comprehensive Code of Business Conduct which includes provisions prohibiting forced or child labor. We require all employees to comply with, and have training on, the Cummins Code of Business Conduct. Included in our Code of Business Conduct is the following language:

"...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 labor anywhere and we will not do business with any company that does. . . . Our commitment to fair treatment also extends to our joint ventures, suppliers and other partners..."

Through our Supplier Code of Conduct, we make sure our suppliers and partners understand our values and treat their stakeholders in a way that is consistent with those values.

Verification of Product Supply Chain

Cummins suppliers are required to sign a response form (“SCOC Response Form”) agreeing to comply with the Supplier Code of Conduct (“SCOC”), which includes a prohibition against forced or child labor, or affirmatively set forth the reasons why they are unable to comply. Cummins reviews the SCOC Response Form to ensure that it meets the intent of the SCOC. If Cummins concludes that the supplier is not in compliance based on the SCOC Response Form, Cummins will work with the supplier to (a) develop a plan to attain compliance, or (b) work on an exit strategy. If the Supplier agrees to take the appropriate steps to comply, Cummins will monitor the supplier’s actions until all those required have been taken.

Supplier Audits

To verify that suppliers remain in compliance with SCOC, Cummins conducts 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 behaviors or conditions viewed as systemic or critical are observed during the audit, the situation is reviewed with the Cummins legal department for appropriate action.

Supplier Agreements

Cummins requires suppliers that make up the top 80% of purchases to sign an SCOC Response Form or a contract that contains SCOC language, which requires suppliers to comply with applicable laws and regulations and includes the prohibition against the use of forced or child labor of any kind.

Accountability Standards and Procedures

As our Code of Business Conduct states, “. . . [w]e will not tolerate child or forced labor anywhere and we will not do business with any company that does. . . .” Employees and contractors have multiple avenues to raise concerns should a fellow employee or contractor be suspected to be in violation of this core ethical principal. These avenues include contacting their supervisor, human resources or calling the ethics helpline or report through a specially designed ethics website. Cummins does not tolerate retaliation and no action will be taken against an employee or contractor because he or she reported a concern.

Similarly, Cummins SCOC sets forth our expectations for suppliers. An employee or contractor who identifies a potential violation of the SCOC (outside of the Supplier Audit context described above) should report the information to his or her management, the purchasing department or the legal function so that Cummins can investigate the matter and take appropriate action.

Supply Chain Training. Cummins trains employees responsible for supply chain management on Corporate Responsibility. We require all Cummins employees to comply with, and have training on, the Cummins Code of Business Conduct, which includes provisions prohibiting forced or child labor.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Training

We have zero tolerance to slavery and human trafficking. To maintain awareness and ensure a high level of understanding of the risks of modern slavery and human trafficking in our businesses our Code of Business Conduct is available on the Intranet.

In addition to an online training course “Cummins Code of Business Conduct” available to all Cummins employees globally, since 2019, Cummins has offered an online training course “Human Rights Training” that 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 & Safety, & Quality.

This statement constitutes Cummins Norway AS’s account for the financial year 2022, as required by the Norwegian Transparency Act.