Cummins Code of **Business Conduct**

VISION

Making people's lives better by unleashing the Power of Cummins.

MISSION

We unleash the Power of Cummins by

- Motivating people to act like owners working together.
- Exceeding customer expectations by always being first to market with the best products.
- Partnering with our customers to make sure they succeed.
- Demanding that everything we do leads to a cleaner, healthier, safer environment.
- Creating wealth for all stakeholders

At Cummins, we strive to always act with integrity, to do what is right and to do what we say we will do.

This principle is at the forefront of our dealings with each of our stakeholders – our customers, employees, suppliers, shareholders and the countries and communities in which we live and work.

It is bolstered by our commitment to the following values:

- Innovation: We apply the creative ingenuity necessary to make us better, faster, first.
- Delivering Superior Results: We exceed expectations, consistently.
- Corporate Responsibility: We serve and improve the communities in which we live.
- Diversity: We embrace the diverse perspectives of all people and honor both with dignity and respect.
- Global Involvement: We seek a world view and act without boundaries.

We want Cummins to be known as trustworthy in all respects. All members of Cummins, from our directors, officers and employees to our distributors, subsidiaries and affiliates, continually work to develop and protect the Company's reputation and commitment to honesty and fairness.

Our commitment to integrity means that we will exceed the minimum requirements of the law and industry practices. It means that we will establish the policies that serve as a daily guide to our behavior. And we will identify conduct that is not permitted.

We feel strongly about our written policies and will not tolerate violations at any level of the company. In some cases, failure to follow these policies could result in dismissal as well as civil or even criminal liability for the company, individuals or both.

Even though these values are part of our culture, you may encounter a situation where our standards conflict with other interests. For example, you may be faced with the feeling that a sale must be made "no matter what it takes," or that costs must be cut, even though product quality could suffer.

When these situations arise, you should ask yourself the following questions:

- Is this against the letter or spirit of the law? If the answer is yes, don't do it.
- Would I want my family members or loved ones to know that I have done this? If the answer is no, don't do it.
- Would I want to read about my actions on the front page of the local newspaper? If the answer is no, don't do it.
- Do I feel uncomfortable with this particular course of action? If the answer is yes, don't do it.

If you are concerned about what course of action to take, you should seek help from a supervisor or contact Cummins General Counsel. You may also make anonymous inquiries by calling the confidential "Ethics Help Line" at the appropriate number for your location.

Specific examples of conduct regarding our customers, suppliers and competitors are highlighted in this document. It also touches on issues that relate to employees, shareholders and our communities, and conduct regarding our facilities and property, political campaigns and government officials.

Some of the areas of conduct are very technical. Many are supported by policies and procedures that can be viewed on our internal website found at ccn.cummins.com. If you have any questions about a specific policy, do not hesitate to call the person designated as the policy owner, or contact Cummins General Counsel.

All of us have a stake in making sure that our conduct is above reproach. I am confident that each of you will do your part to maintain the high standards that have long been a part of Cummins.

Tim Solso Chairman and Chief Executive Officer Cummins Inc.

Jim Solso

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CONDUCT REGARDING OUR CUSTOMERS, SUPPLIERS AND COMPETITORS

Treatment of Customers

We are dedicated to meeting or exceeding the expectations of our customers better than our competitors. Our organizations look at industry trends and predict how these trends will impact our products and services so that we can best meet our customers' needs. Our products, information and support are designed to give our customers a competitive advantage.

Cummins Products

Cummins products embody the highest levels of quality and innovation. They are safe, while meeting the performance, durability and reliability needs of customers. They meet or surpass appropriate emission standards for the country in which they are sold.

Competitors

Cummins competes vigorously with our competitors, but always with integrity. Employees should not disparage Cummins competitors or their products.

Generally, an employee should not accept confidential information about a competitor. However, it is acceptable to collect information on competitive products and strategies by gathering printed information, photographs and, under certain conditions, engaging in conversations at trade shows. For more information, contact Cummins General Counsel.

Antitrust Compliance

Antitrust laws and regulations in the United States or other countries where Cummins has interests must be obeyed. These laws deal with agreements among competitors, agreements with resellers, price discrimination and other acts or situations that may unfairly reduce competition.

For more information, see "Antitrust Compliance Policy" (CORP-00-11-01-00).

Government Contracts

Because the Company is a supplier to federal, state and local governments around the world, Cummins employees must comply with all laws and regulations relating to government contracts and cooperate fully with investors and auditors who require information in connection with these contracts.

For more information, see "Government Contract Reporting" (FINA-09-0097).

Import/Export Controls and Boycotts

Any employee contemplating a business transaction that will result in a Cummins product having an end destination in certain countries must contact Cummins General Counsel. These countries currently include Afghanistan, Cuba, North Korea, Iran, Iraq, Libya and Sudan. Other restrictions may apply in certain countries, including Angola, Burma, India, Liberia, Pakistan, Rwanda, Somalia, Syria and Yugoslavia. For an updated list, contact Cummins General Counsel.

For more information, see "Policy on Trade with Red Flag and Restricted Countries Policy" (CORP-00-04-00-00).

Payments to Government Officials

There are many legal and ethical issues surrounding the question of making payments to individuals outside the normal course of business. On this matter, the Cummins policy must be closely followed. In no event should a payment be made that violates the Foreign Corrupt Practices Act of 1977, which is detailed in the full policy.

In most cases, Cummins can reach its corporate objectives without dealing with this issue. If, in spite of an employee's efforts, the choice is to make a corrupt payment or lose business, the Company will accept the business loss.

For more information, see "Questionable Payments Policy" (CORP-00-04-01-00).

CONDUCT REGARDING CONFLICTS OF INTEREST

Dealing with Suppliers

If an employee or his or her family member has a relationship with a current or potential supplier, there exists the potential for a conflict of interest. For that reason, the employee should not participate in any decisions related to the supplier or potential supplier, and should inform his or her supervisor of the relationship.

For more information, see "Cummins Purchasing Policy" (CORP 00-02-00-00).

Terms of Commercial Transactions

Cummins competes on a straight commercial basis everywhere in the world. Our employees will do nothing in search of business they would not reveal willingly to any other member of the Company, any government official or any member of the public. Conducting our business with integrity – honestly and fairly – will earn repeat business from our customers and help us achieve our goal of lifelong customers.

For more information, see "Questionable Payments Policy" (CORP-00-04-01-00).

Meals, Gifts and Discounts

The casual exchange of meals and token gifts is a widespread and generally harmless custom when done in moderation.

Generally, it is appropriate for the host to pay for a meal. If this is not practical, then the host should ensure that meal purchases are equal, over time. The Cummins employee should always pay for a customer's meal.

A limit of \$50 is acceptable for gifts. If a refusal to accept a present offends the other party, then the gift should be acknowledged and if its value exceeds \$50, it should be reported to the employee's supervisor.

Cummins employees should not accept discounts on personal goods that are linked to actual or potential business dealings.

For more information, see "Meals and Gifts and Discounts Policy" (CORP-00-11-04-00).

Outside Employment

Each Cummins exempt employee is expected to devote his or her attention and energy to the work that is done for the Company. Employees may not work for a Cummins customer, supplier, or competitor. Employees may not hold other full or part-time positions or directorships outside the Company unless the job is permitted by the employee's manager and is disclosed in the annual Ethics Certification Statement.

For more information, see "Outside Employment of Full-time Members of Cummins Exempt Workforce Policy" (CORP-00-05-02-00).

Trading in Cummins Securities

The civil and criminal penalties associated with the illegal trading of Cummins stock may be severe. To avoid problems with stock purchases or sales, employees should:

- · Avoid trading in stock until at least three days after a material event that can affect the stock price is made public.
- · Not discuss material information with another individual unless it has been made public.
- · Consider how a transaction may look six months from now, or if it is reported in the newspaper.
- Seek approval from Cummins General Counsel if you have uncertainty about a stock transaction. Directors and Officers of Cummins must pre-clear any transactions in Cummins stock with Cummins General Counsel.

For more information, see "Trading in Cummins Securities Policy" (CORP-00-11-00-00).

CONDUCT REGARDING OUR EMPLOYEES

Treatment of Each Other at Work

Dignity and respect are the keys to the treatment of fellow employees at Cummins. It is the only basis on which people can work well together, and working well together is critical for a Company that operates in a highly competitive environment.

To maintain an atmosphere of respect, no one should make comments that are embarrassing or demeaning to another. An employee who takes part in harassing behavior that creates a hostile or offensive work environment will be subject to severe disciplinary action, up to and including immediate dismissal.

Our no-tolerance policy also applies to customers, suppliers and contractors.

For more information, see "Treatment of Each Other at Work Policy" (CORP-00-05-01-00).

Diversity and Equal Employment Opportunity

The championing of diversity is one of Cummins core values: We embrace the diverse perspectives of all people and honor both with dignity and respect.

That value is supported by the Cummins policy to provide equal employment opportunity worldwide for all our employees regardless of race, color, religion, gender, national origin, citizenship, age, sexual orientation, physical or mental disability or veteran status.

For more information on this matter see "Equal Employment Opportunity and Affirmative Action Policy" (CORP-00-05-04-00).

Health, Safety and the Environment

The health and safety of all employees is of critical importance at Cummins. One of our five mission statements demands that everything we do leads to a cleaner, healthier, safer environment.

All our facilities use safety and environmental management systems designed to protect our people and the environment, to preserve natural resources and to prevent harm to local communities. Prevention of occupationally related injuries and illnesses is the responsibility of every Cummins employee. In addition, all employees are expected to immediately report unsafe or hazardous working conditions to a supervisor.

For more information, see "Corporate Health, Safety, and Environmental Policy" (CORP-00-08-00-00); "Corporate Physical Security Policy" (CORP-10-03-00-00).

Alcohol and Illegal Drugs in the Workplace

Illegal drug or alcohol use on the job may pose serious safety and health risks for an employee as well as others who work nearby, and may affect job performance. Disciplinary procedures for violation of this policy could include termination, even for a first offense.

The Company makes every effort to maintain a drug-free workplace by requiring a pre-employment screening. On the job, drug and alcohol testing is conducted to the extent permitted by law and our contracts and through the counseling of an employee assistance program.

For more information, see "Alcohol and Illegal Drugs in the Workplace Policy" (CORP-00-05-03-00).

CONDUCT REGARDING OUR COMMUNITIES

A Pledge to Participate

Cummins strongly believes that we have a corporate responsibility to serve and improve the communities where we do business.

Community Activities

All employees are encouraged to help make their communities a better place to live. This may mean serving on school or church boards, coaching youth sport activities, running for political office or participating in any number of worthwhile activities.

The Company does not dictate the position employees should take on community or public issues. However, when an official Company position is necessary or desirable, only the appropriate Cummins officer can issue a statement.

For more information, see "Employee Participation in Community Activities Policy" (CORP-00-05-05-00).

CONDUCT REGARDING OUR SHAREHOLDERS

Shareholder Value

Cummins is committed to protecting and improving the value of our shareholders' investment through the prudent application of corporate resources and by observing the highest standards of legal and ethical conduct in all of our business dealings.

Financial Records

The accuracy of our financial reports is of utmost importance. No false or misleading entries or failure to make required entries is permitted for any reason. We cooperate fully with our auditors and under no circumstances withhold information from them.

Each employee must report all corporate transactions accurately, including receipts, disbursements and the purpose of the transactions. Invoices, quotations, receipts and other statements reflecting charges, prices, product descriptions, terms or business intentions, must be complete and accurate.

For more information, see "Financial Representations Policy" (CORP-00-11-02-00).

CONDUCT REGARDING OUR PROPERTY

Protect and Conserve

It is the policy of Cummins to manage and operate our business in ways that protect the environment and conserve both energy and natural resources. In addition to complying with all applicable environmental laws and regulations, the Company recognizes excellence in environmental management as one of the five components of its mission statement. In some cases, that focus may lead Cummins to do more than the law requires.

Information Security

The secure use and distribution of information and data in the workplace is critical to Cummins success in a competitive environment. Employees should use extreme care in protecting confidential or proprietary information stored in paper documents, on computers, in overhead transparencies, voice mail systems and electronic mail and in similar systems and materials. Face-to-face conversation on confidential subjects should be conducted in a secure location. Employees should not attempt to access secret or restricted data unless permitted by the owner of that information.

For more information, see "Cummins Information Security Policy" (CORP-10-01-00-00); "Classifying and Protecting Data Policy" (CORP-10-01-03-00); "Protection of Cummins Proprietary Interests Policy" (CORP-01-02-00-00).

Computer Equipment and E-Mail

The Company's computer hardware, software and data may be used only by authorized personnel for Company business. All licensing provisions and copyright restrictions are respected.

Generally, the Company's electronic communications systems are only for business activities or Cummins sponsored community, charitable and/or social activities. Some personal use is allowed if it does not interfere with the employee productivity or pre-empt any business activity.

For more information, see "Company-Owned Business Resources Usage Policy" (CORP-10-01-06-00).

Document Retention

During the course of business, thousands of documents are produced daily in the Cummins global network. Cummins will keep and maintain documents based on their relevance and in accordance with applicable state and federal laws and regulations. Records critical to Cummins ongoing business operations also should be identified and safeguarded. Records that are not necessary for legal or business reasons should be destroyed to avoid the high cost of storage.

For more information, see "Record Retention Policy" (CORP-07-11-00-00).

CONDUCT REGARDING POLITICAL CAMPAIGNS AND THE MEDIA

Political Contributions

The Cummins Political Action Committee determines which candidates receive contributions from the committee. Those contributions should reflect the candidate's public integrity, support for Cummins core values and issues of importance to the Company.

For more information, see "Cummins Political Contributions Policy and Political Action Committee Guidelines" (CORP-00-06-00-00).

Participation in Political Campaigns

Cummins believes that employees who wish to run for political office or support a political campaign have the right to follow their personal convictions in these matters. However, no Company property can be used to support any candidate's political campaign, unless directed by the Cummins Political Action Committee. Employees may not conduct campaign activities during regular working hours.

For more information, see "Employee Participation in Political Campaigns Policy" (CORP-00-06-01-00).

Public and Media Relations

Like other businesses at Cummins, dealing with the media requires expertise.

Sensitive inquiries from the media and the general public, including those related to Cummins Inc. corporate policies, financial performance, mergers and acquisitions, joint ventures, public affairs, litigation, the Cummins brand and environmental compliance should be directed to the Corporate Communications department in Columbus.

Corporate Communications also will provide advice and support on media matters to other Company organizations, when needed.

The BU marketing and ABO leaders have responsibilities for managing the communications flow with Cummins customers, distributors, partners, suppliers and industry press.

Inquiries from analysts, investors, shareholders and financial institutions should be directed to the office of Investor Relations in Columbus.

No spokesperson for Cummins should knowingly make a material mis-statement to any member of the media or public.

For more information, see "Public and Media Relations Policy" (CORP-00-25-00-00).

CONDUCT OF LEADERS

Organizational Leadership

Excellence in leadership is critical to the Company's current and future success. Our leaders must spend time with employees, customers and other key stakeholders to understand their needs. They must create and nurture organizations that facilitate high performance and deliver superior results. They must continually look for future opportunities to improve and expand company performance.

A leader who operates with excellence is one who sets, communicates and deploys organizational values to all of his or her employees. The leader creates work expectations, reviews performance and helps set priorities for improvement.

For more information, see "Ethical Standards Policy" (CORP-00-05-00-00).

Administration of the Code

This Code of Business Conduct has been approved by the Company's Board of Directors and has the full support of the Chairman and the members of the Policy Committee. Cummins General Counsel will administer the Company's overall program implementing these policies. Business Analysis and Audit is responsible for obtaining an annual ethics certification from specific employees.

Individual Responsibility

It is the responsibility of each employee to uphold this code and the Company policies and procedures. All employees are expected to administer and enforce it as a part of their responsibilities.

An employee's conduct, in relationship to the code and policies, may affect his or her performance reviews and job status. Violations or failure to report violations are grounds for discipline, up to and including discharge.

Questions

Questions should be directed to a supervisor or the responsible heads of Human Resources or Cummins General Counsel.

Reporting Concerns

If an employee wishes to report any code compliance matters, he or she may contact Cummins General Counsel. Or such reports may be made anonymously by calling the confidential Ethics Help Line at the appropriate number for the employee's location.

The Company will support any employee who raises an ethical issue or question or reports wrongdoing to management in good faith. All inquiries and reports will be treated with courtesy and discretion, and no employee will suffer any reprisal, retaliation or career disadvantage for reporting questionable behavior. Any employee who feels as though he or she is suffering any form of reprisal, retaliation or career disadvantage as a result of reporting an ethical issue should report it immediately in the manner described above.

Improvement of the Code of Conduct

The Code of Conduct is intended to be a living document, always relevant to the business situations Cummins employees face daily. Suggestions for improving the code should be sent to Cummins General Counsel.

Nothing contained in this manual should be construed or implied to constitute a contract or term of employment altering or changing the character of the employment relationship between the Company and its employees.

