



Code of Business Conduct

Ethics Driven – Every Time

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Finding the policies referenced in the Cummins Code of Business Conduct:

All policies that relate to the Code can be found on MyCummins. Go to MyCummins and click on the tab marked “Our Company.”

On the left side of the page, you will see a link to “Corporate Policies.” This link will take you to a list of links to the policies referenced in the Code of Business Conduct.

Code of Business Conduct

At Cummins, doing the right thing is not optional. Whether it is providing the best possible products or world class customer service, treating all stakeholders with respect or acting with integrity in all we do, Cummins has a legacy of ethical behavior that dates back to the Company's earliest days.

As you will see, the basic tenets of the Cummins Code of Business Conduct have not changed much from previous versions of the Code. In fact, that the underlying values and principles reflected in the Code have endured the test of time is a sign of their strength and permanence.

It has been written that character is what a person does when no one is looking. A true measure of a person is in how he or she reacts to difficult circumstances or behaves when the stakes are high, but no one is looking over their shoulder to ensure they do the right thing.

The same can be said for a company. Ethics are not situational; integrity not an act of convenience. Doing the right thing is only meaningful if we strive to do it every time and in every situation,

even if it means turning down business, delivering bad news to a customer or temporarily surrendering some measure of competitive advantage in the marketplace.

Cummins has become a significantly larger and more complex organization since we last updated the Code in the early part of this decade. Our success has fueled growth, which in turn will yield even more business opportunities in the future. At the same time, growth means our employees around the world will face more, new and increasingly complex ethical challenges.

Our commitment to doing the right thing means we will go beyond what is required of us by law as individuals and a company by establishing and adhering to a clear set of principles to guide our actions. We also will clearly define conduct that is not acceptable and offer multiple ways for employees to register their concerns secure in the knowledge that they do so at no risk to their career at Cummins.

This latest version of the Cummins Code of Business Conduct has been designed to be more practical and easier to

“ Words not supported by actions, however, are meaningless. Our commitment to doing the right thing demands that we be willing to enforce all aspects of the Cummins Code of Business Conduct. ”

Tim Solso, Chairman & CEO

understand and use. At its core are the “Statement of Ethical Principles,” 10 concise statements that lay the groundwork for how we will treat all our stakeholders – employees, customers, investors, suppliers, regulators and the communities in which we operate.

The principles are a natural outgrowth of the Company’s Vision, Mission and Values, and offer guidance on what conduct is acceptable and what is not. They are supplemented in each case by Q&A, which offer real-world guidance on how to apply the principles. And, as in previous Codes, this version is tied to the numerous corporate policies that provide specific rules and guidance on issues related to our business conduct.

Our commitment to doing the right thing demands that we be willing to enforce all aspects of the Cummins Code of Business Conduct; violations of the Code, at any level of the Company, will not be tolerated and will be dealt with swiftly and appropriately.

Taking the right course of action often is difficult – either because the pressure to perform seems to outweigh the damage done by cutting ethical corners or because the line between right and wrong isn’t always clear. In such

cases, you shouldn’t feel as if you have to act on your own. Cummins stands ready to help. Your supervisor, a member of senior leadership, Human Resources and the Cummins Law Department all can provide guidance handling the difficult decisions we increasingly face.

Employees also have an obligation to report suspected violations of the Code to the appropriate individual at the Company, or can do so on-line at ethics.cummins.com, or by calling the Company’s Ethics Help Line in the U.S. at 1-800-671-9600.

I am confident that you will find this latest version of the Cummins Code of Business Conduct a useful guide, and that each of you will join me in doing our part to uphold the high ethical standards that have been a hallmark of Cummins for 90 years.



A handwritten signature in black ink, appearing to read "Ami Solso". The signature is written in a cursive, flowing style.

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.

Values

Integrity

We strive to do what is right and we do what we say we will do

Innovation

Apply the creative ingenuity necessary to make us better, faster, first

Delivering Superior Results

Exceed expectations, consistently

Corporate Responsibility

Serve and improve the communities in which we live

Diversity

Embrace the diverse perspectives of all people and honor both with dignity and respect

Global Involvement

Seek a world view and act without boundaries

Statement of Ethical Principles

- We will follow the law everywhere.
- We will embrace diverse perspectives and backgrounds, and treat all people with dignity and respect.
- We will compete fairly and honestly.
- We will avoid conflicts of interest.
- We will demand that everything we do leads to a cleaner, healthier and safer environment.
- We will protect our technology, our information and our intellectual property.
- We will demand that our financial records are accurate and that our reporting processes are clear and understandable.
- We will strive to improve our communities.
- We will communicate honestly and with integrity.
- We will create a culture where all employees take responsibility for ethical behavior and employees are free to raise concerns.

We will follow the law everywhere.

Cummins Inc. is headquartered in the United States, but we are truly a global citizen. Sometimes the U.S. laws follow the Company and its people around the world. For example, U.S. laws about how we sell our products, how we compete and how we interact with government officials often apply around the world. We also must follow the applicable laws in the other countries where we do business.

This may get complicated at times, but we must always make sure that our actions and our words follow the letter and spirit of all applicable laws. If you have any questions, please contact the Cummins Law Department for assistance.



Q *Some of the laws in my country make it difficult for us to get all the business that is out there and I don't believe all of our competitors are playing by the rules. If our competitors are not following the law, why should we?*

A Our Code and our values are not affected by the actions of others. We must always follow the law and our Code, even if it means that business will be lost.

Q *I work outside the United States and my country's laws regarding exporting products to certain countries are not the same as the laws in the United States. How do I know which laws I should follow?*

A Sometimes one set of laws takes precedence over another depending on the situation. Other times, both laws may apply. Therefore, you should always contact the Cummins Law Department when you have a question about which laws may apply to a certain situation.

Significant Underlying Policies:

Export Control Policy

Prohibited Payments to Government Officials Policy

Antitrust Compliance Policy



We will embrace diverse perspectives and backgrounds, and treat all people with dignity and respect.

At Cummins we must be inclusive and ensure that employees and other stakeholders are always treated with dignity and respect. We are stronger because of the diversity of our employees. To remain a global leader and to continue to grow, our people must have a work environment that is welcoming and takes advantage of their unique talents and perspectives.

We strictly forbid discrimination, harassment and retaliation, and strive to provide equal opportunity and fair treatment for all. Cummins prohibits discrimination or harassment based on an individual's race, color, religion, gender, national origin, age, disability, union affiliation, sexual orientation, gender identity and/or expression, or other status protected by applicable law. We encourage employees who see mistreatment to speak out and we protect them from retaliation if they do.

We support human rights around the world, and we ensure that our employees and other stakeholders are treated with dignity. We comply with all applicable laws, and we will treat employees and their representatives fairly and honestly. We will not tolerate child or forced labor anywhere in the world and we will not do business with any company that does. We respect employees' freedom of association, right to bargain collectively and all other workplace rights.

Our commitment to fair treatment also extends to our joint ventures, suppliers and other partners. Through our Supplier Code of Conduct, we will make sure our suppliers and partners understand our values and treat their stakeholders in a way that is consistent with those values.

“ In the search for character and commitment, we must rid ourselves of our inherited even cherished biases and prejudices. Character, ability and intelligence are not concentrated in one sex over the other, nor in persons with certain accents or in certain races or in persons holding degrees from universities over the others. When we indulge ourselves in such irrational prejudices we damage ourselves most of all, and ultimately assure ourselves of failure in competition with those more open and less biased. ”

J. Irwin Miller, Former CEO, Cummins Inc.

*We will embrace diverse perspectives and backgrounds,
and treat all people with dignity and respect.*

Q *I feel that my supervisor is discriminating against certain members of our organization but I'm afraid to say anything for fear of losing my job. What should I do?*

A Cummins does not tolerate discrimination and encourages employees to speak out with their concerns. You have multiple avenues to raise your concerns. You may contact your supervisor, Human Resources or you may call the Ethics helpline or report through the EthicsPoint webpage by typing "ethics.cummins.com" on your internet browser. Cummins does not tolerate retaliation and no action will be taken against you because you reported a concern.

Q *I heard an allegation that one of our major suppliers is in violation of the labor laws in its country. Is this something Cummins should look into?*

A Yes. Cummins has a Supplier Code of Conduct that sets forth our expectations for suppliers. You should report the information to your business leader, the Purchasing Department or the Law Department so that Cummins can investigate the matter and take appropriate action.

Significant Underlying Policies:

Treatment of Each Other at Work Policy

Equal Employment Opportunity and
Affirmative Action Policy

Supplier Code of Conduct



We will compete fairly and honestly.

Our goals in the global marketplace are to win business and provide value to our stakeholders. We compete aggressively but always play within the rules. Whether dealing with competitors, governments or business partners, the mandate is the same: We compete fairly and honestly.

Our employees should not take any action in the pursuit of business that they would not be comfortable reading about on the front page of the local newspaper or explaining to our senior management. Likewise, we are responsible for the actions of third parties operating on our behalf and will hold them to the same standards as our employees.

For example:

- We do not bribe private individuals or government officials for any reason – we get business because our products, services and people are the best.
- We do not use the confidential information of others to gain an improper advantage.
- We do not mislead others or compromise our integrity to gain an advantage.
- We do not disparage our competitors or their products – we truthfully talk about the advantages of Cummins.

Although we operate in many different places with different cultures and legal systems, there are no exceptions to our commitment to compete fairly and honestly at all times.

Q *Someone sent me a copy of our largest competitor's confidential internal pricing sheet for its products. This will be very helpful to us as we determine our pricing for next year. Can I use this information?*

A No. If the information is confidential, it cannot be used. Doing so is unethical and also could expose you and the Company to risk under antitrust or anti-competition laws. You should immediately contact the Cummins Law Department so that the information can be destroyed or returned to its owner.

Q *In my region it is customary to provide our customers, including government officials, with expensive gifts to help maintain a good relationship. If it is necessary to do business, we have to do it, right?*

A No, we do not make improper payments of any kind to influence our customers, suppliers or partners. Making such payments -which include gifts - may subject you and Cummins to large penalties, criminal prosecution and the loss of business. Before making or authorizing any gift or gratuity, please make sure you have consulted the appropriate Cummins policy or contacted the Cummins Law Department.

Significant Underlying Policies:

Antitrust Compliance Policy

Prohibited Payments to Government Officials Policy

Purchasing Policy

Protection of Cummins Proprietary Interests Policy

Meals and Gifts and Discounts Policy

Q *We are not supposed to disparage our competitor's products. Can we point out the differences between our products and why our products are better?*

A Yes. It is OK to point out to customers or others why we believe the features and performance of Cummins products are better than our competitors. That is what we should be doing. It is not acceptable under our Code to make unsubstantiated claims about our competitors' products or to call them "junk" or "unsafe." Instead we should focus on the data and the reasons why Cummins is the best.

We will avoid conflicts of interest.

There are times when an employee may have a personal interest that could conflict with the interests of the Company. As employees, we must focus on what is best for our stakeholders and manage potential conflicts so that our personal interests do not interfere with our business dealings.

Employees cannot have improper relationships with suppliers or other third parties and must be vigilant in ensuring that personal or family relationships do not pose even an appearance of a potential conflict of interest. Employees also cannot accept cash incentives or other gratuities from suppliers or customers in exchange for securing business or other favorable treatment.

Also, Cummins employees cannot take any action that would allow them or others to personally benefit from inside information regarding the Company. You cannot trade in Cummins stock when you know about a material event that has not yet been made public. You should always contact the Cummins Law Department if you have questions about a stock transaction.

Q *My spouse is the co-owner of a business that is bidding to be a Cummins supplier. What should I do?*

A You should immediately disclose the relationship to your supervisor and whoever is in charge of the bidding process. If your spouse's company is bidding for business it is critical that you not play any role in the selection of the supplier. If your spouse's company is chosen to be the supplier, the Company will take steps to ensure that you are not involved.

Q *I know through my job that Cummins is going to have a strong quarter and that sales are going to exceed our expectations. Can I tell my brother to buy Cummins stock now before we release our earnings to the public next week?*

A No. Using inside information to benefit yourself or others is never the right thing to do. Moreover, most countries have laws making such conduct illegal. You could be placing the Company and yourself at risk of liability or criminal prosecution.

Significant Underlying Policies:

Purchasing Policy

Meals and Gifts and Discounts Policy

Trading in Cummins Securities Policy

Outside Employment of Full-Time Members of Cummins Exempt Workforce Policy

Q *A company we are considering for a supply contract has offered to fly me to a sporting event and entertain me for the weekend. Is that a problem?*

A Yes, it is a problem. We select our business partners and suppliers solely on legitimate business reasons. We do not want to take any action that would appear to be a conflict of interest. Regardless of whether you are directly involved in selecting this supplier, this would create the wrong impression. Please consult the Company policy on meals, gifts and discounts for guidance and always speak to your supervisor before accepting any gift or gratuity from a third party.

We will demand that everything we do leads to a cleaner, healthier and safer environment.

This principle is central to our mission as a company, and as our global reach grows so does our responsibility to ensure that our actions around the world reflect a commitment to the environment.

That commitment takes on several forms, including:

- Using our technological capabilities to produce the safest and cleanest-running products on the market.
- Minimizing the environmental impact of our manufacturing and service facilities through comprehensive conservation and waste reduction efforts.
- Ensuring that Cummins employees everywhere have clean and safe facilities in which to work.
- Demonstrating a commitment to sustainable growth by providing leadership on important environmental issues such as climate change.
- Demonstrating a dedication to transparency in sharing our environmental and safety-related activities with key stakeholder groups.

We will demand that everything we do leads to a cleaner, healthier and safer environment.

Q *I work in a Cummins manufacturing facility. What can I do to contribute to the Company's environmental and safety goals?*

A When it comes to workplace safety, our goal is simple: We do not want injuries or accidents at any time. Safety begins with each individual employee. We all have a responsibility to contribute to a safe work place by following established safety procedures and by reporting any issues promptly so they do not become problems. Please make sure you are familiar with your site's safety procedures.

We all can help reduce Cummins' environmental impact by conserving resources such as water and electricity whenever possible. Our employees also often are our best source of improvement ideas and each of us should feel empowered to offer suggestions that could eliminate waste or make our facilities safer.

Q *How is Cummins working to be a leader on an issue such as climate change?*

A The Company is actively involved in reducing greenhouse gas emissions in a number of ways. For starters, we recently committed to lowering the greenhouse gas emissions from our facilities by 25 percent as a percentage of our net sales by 2010. Cummins also is a leader in the clean diesel movement to increase the use of fuel efficient and clean-burning diesel engine technology, which would reduce the demand for fossil fuels.

Significant Underlying Policies:

Corporate, Health, Safety and Environmental Policy
Physical Security Policy
Cummins Sustainability Report
Alcohol and Illegal Drugs in the Workplace Policy



We will protect our technology, our information and our intellectual property.

Our technology and our knowledge give us a competitive edge. It is critical that we maintain our advantage by making sure that we protect proprietary information and maximize its value to our shareholders. All Cummins employees must protect the Company's confidential information and intellectual assets.

Also, it is critical that we use our information, innovations and resources wisely and in the best interests of all of our stakeholders. Our computers and our other resources are to be used for Company business and we must follow all rules regarding their proper usage. We should not use these resources for our personal benefit or for any purpose that conflicts with Cummins' interests or needs. Confidential or otherwise sensitive Company information should not be filed or stored in a non-Cummins location, such as at an employee's home or on his or her private computer, without proper approval.

We also must make sure that all important Company documents and information are properly maintained or disposed of under the Company's document management policy. Employees should take precautions to ensure that laptop computers, mobile phones, PDAs and other devices that contain or store Company information are not lost or stolen, and should report the disappearance of any such equipment immediately.

Q *I was surfing the internet at home and learned about some software that I can download for free that will help me with my Cummins work. Since the software is free and it is business related may I download it to my Cummins computer?*

A No. Cummins has specific procedures for when software can be added to Cummins systems and employees cannot download software to Cummins computers. In addition, many of these “free” downloads may contain terms that subject Cummins to financial liability or that conflict with existing Cummins software licensing agreements. If you have any questions about the software that is approved by Cummins, please contact the Information Technology (IT) department.

Q *I've been working on an exciting new technology that we are creating for our engines. I have been meeting with a supplier over lunch to discuss the sourcing of this work and exchanging e-mails with the supplier containing information about the technology. Is there anything I need to be doing to safeguard the Company's interest?*

A Yes. Before talking to suppliers or customers about Cummins technology, you should contact the Cummins Law Department to be sure that the appropriate confidentiality and non-disclosure agreements are first put in place. This will ensure that the other party honors the confidentiality of our intellectual property and will help protect the Company's interests if there is ever a dispute about ownership of the information.

Significant Underlying Policies:

Information Security Policy
Protection of Cummins Proprietary Interests Policy
Classification and Protection of Data Policy
Company and Business Resources Usage Policy
Document Management Policy

Q *I have some documents containing test results of one of our engines that are the subject of some pending litigation. Can I destroy these documents?*

A No. You must maintain documents in accordance with the Company's document management program. Documents that relate to pending litigation or government investigations can never be destroyed. You should contact the Law Department and make sure they are aware of the documents.

We will demand that our financial records are accurate and that our reporting processes are clear and understandable.

The accuracy of our financial reports is of the utmost importance to our credibility. We will not tolerate fraud or otherwise make false or misleading financial entries or statements, and all our employees must strive for complete accuracy in our financial reporting.

Additionally, Cummins is committed to total transparency in its financial reports. We cooperate fully with our auditors and under no circumstances withhold information from them. We also will seek to build and maintain a robust system of financial controls and processes to ensure the accuracy and timeliness of our financial reporting.

We will demand that our financial records are accurate and that our reporting processes are clear and understandable.

Q *I hear a lot of discussion these days in the media about corporate fraud. What is fraud and what should I do if I suspect fraud in the workplace?*

A Fraud is any dishonest act engaged in by an employee to gain an improper benefit. Fraud can take many forms such as theft of property, false financial entries, incorrect expense reports, personal use of the Company credit card or other acts of dishonesty. Cummins will promptly investigate reported incidents of fraud and, where appropriate, will prosecute instances of fraud. Employees who commit fraud will be subject to the highest possible level of discipline.

Various Company policies prohibit fraud in its different forms. If you become aware of any act that might constitute fraud, you should report your concerns immediately to one of the following:

- Your supervisor
- Your business leader
- Human Resources
- Internal Audit
- A member of the Cummins Law Department

If for any reason you are not comfortable taking your concerns to any of the above departments or individuals, contact the Ethics Helpline. Instructions for contacting the Ethics Helpline are contained at the end of this document.

Significant Underlying Policies:

Financial Representations Policy
Fraud Reporting Policy
Document Management Policy
Delegation of Authority Policy

Q *I have received several large invoices for payments due to our suppliers. However, if I record these as an expense now, it will hurt our numbers this quarter. Is it OK to just put these in a drawer for now and record them accurately after the end of the quarter?*

A No. Failing to record these expenses would reduce current period expenses and result in overstated earnings. This could have a material and fraudulent effect upon the current period financial reports. This is against Company policy and the law.

We will strive to improve our communities.

Cummins is only as strong as the communities in which we operate and in which our employees live, so it is imperative that the Company play a role in serving the needs of the community wherever possible.

Cummins supports its communities in a number of ways. The Cummins Foundation provides funding to organizations that address key community needs and, in some cases, matches employees' contributions to local charities. The Company also directly contributes to charitable causes when appropriate.

Perhaps most importantly, however, is that Cummins works to create an environment that encourages employees to become active in their communities and supports those efforts whenever possible. Cummins strongly believes that supporting volunteer involvement by its employees not only benefits our communities but strengthens the Company by providing valuable leadership experience and increasing employee satisfaction.

At the same time, however, employees should refrain from speaking or making commitments on behalf of Cummins for the benefit of the organization or cause in which they participate. Should an official Cummins position be required or desired, it should be made by the appropriate Cummins official.

The Company formally participates in the political process through its Government Affairs Office by engaging elected officials and taking positions on legislative and regulatory issues of importance to the Company. Additionally, Cummins encourages employees to be active in the political process. However, employees should not engage in any political activities at work or use any company resources for political purposes.

Q *I am interested in getting involved in community activities, but I don't know where to start. Who can I speak to?*

A Many Cummins locations have Community Involvement Teams, which coordinate volunteer and community efforts on behalf of Cummins and its employees. Please contact the Company's Corporate Social Responsibility office for contact information for the Community Involvement Team that serves your area. If you already support a local community organization and want to inquire about support from Cummins, you also can check with your Community Involvement Team coordinator or the Corporate Social Responsibility office.

Significant Underlying Policies:

- Employee Participation in Community Activities Policy
- Employee Participation in Political Campaigns Policy
- Cummins Political Contributions Policy and Political Action Committee Guideline



We will communicate honestly and with integrity.

We have a responsibility to be honest and accurate in our communications to employees and the public. No employee will knowingly make a false or misleading statement to the media, financial community, government official, public agency or in a public forum.

We will work to establish and follow communications processes that ensure a timely flow of information throughout the organization, and that create consistent messages that are delivered by the appropriate individuals in the organization.

Only authorized individuals should speak to the media or financial community. Media and sensitive customer inquiries should be directed to the Director - Public Relations, and employees should not speak to the media on Company-related issues without prior approval of the Director-Public Relations.

Cummins has a legal obligation to disclose material financial information as broadly and equitably as possible. Inquiries from stock market analysts, investors or other members of the financial community should be forwarded to the Director – Investor Relations.

Q *I received a call from my local newspaper. The reporter would like to come to the office to interview me for a story on a community organization in which I am involved. Is this OK?*

A Yes. Our employees are not prohibited from talking to the media on non-Cummins issues. Just make it clear to the reporter that you are speaking as a private individual, and not on behalf of Cummins. If a reporter wants to come to a Cummins facility to conduct the interview, you should clear the visit with your supervisor and take any necessary steps to avoid undue distraction to co-workers. If you are uncertain about whether it is appropriate to participate in a media interview, please contact the Director-Public Relations.

Q *I have been asked to speak to a reporter for a story on one of our businesses, and during the course of the interview, the reporter asks my opinion on speculation that a competitor is having quality issues with a key product. I have heard the same rumors. How do I respond?*

A We should not engage in circulating rumors – either about Cummins or our competitors. You should only share facts about Cummins and let our competitors speak for themselves. Competing with integrity demands that we take the high road in such cases.

Significant Underlying Policies:

Policy for Public Disclosures and Communications with Analysts and Investors

Financial disclosure Policy

Cummins Corporate Communication Policy

Q *A reporter asks a question about sales volumes in a particular market. I have the information, but am not sure that I can share it publicly. What should I do?*

A Cummins has clear rules about what financial information we make public and how it should be discussed. We also have a responsibility to share material financial information broadly with investors and the financial community.

If you are uncertain whether the information requested should be shared publicly or how it should be disclosed, contact the Director- Investor Relations for assistance.

We will create a culture where all employees take responsibility for ethical behavior.

Our culture is one that encourages employees to take ownership for ethical behavior and to speak up if they have concerns. All employees are required to follow the Code of Business Conduct and to set an example of ethical behavior.

Cummins will provide support to employees through a Compliance and Ethics Program that provides training to employees on the Code of Business Conduct and other important areas of compliance.

Remember, Cummins has a non-retaliation policy that protects employees who raise concerns in good faith. If you are aware of any conduct that you believe is unethical or inappropriate, you have an obligation to speak up. Concerns can be raised in a number of ways:

- Employees can bring issues to the attention of a supervisor.
- Employees can speak to human resources.
- Employees can raise issues with a third-party via on-line and telephone reporting systems. Please type “ethics.cummins.com” on your web browser for information about how to report your concerns.

If you have a question about whether conduct is appropriate or lawful, you also may contact the Cummins Law Department for assistance. If you do not know who to contact in the Law Department, simply send a Lotus Note to “Law Department” and you will be contacted by the appropriate attorney from your region of the world.

We will create a culture where all employees take responsibility for ethical behavior.

Q *An employee who reports to me has come to me with information about a co-worker's conduct that would clearly violate the Code and Company policy if true. However, she has asked me to keep it to myself for now. What should I do?*

A You must take action to make sure the issue is investigated and addressed. The Company, through you, is now aware of the conduct and is responsible for addressing it. If you need assistance on the proper way to address, contact your supervisor, Human Resources or the Law Department.

Q *I have some concerns about my department and whether the employees truly understand the Cummins Code of Business Conduct. What should I do?*

A Seek assistance. Contact your supervisor or business or Human Resources leader and ask for more information. The Company will be glad to provide additional training or support to make sure that all employees understand the Code and their responsibilities to comply.

The Role of Leaders

If you are an officer, a director or a manager who supervises others, you have a special responsibility to model the behavior of the Code and make sure it is enforced. If you see actions that might violate the Code – even if they do not affect you in any way – you are required to bring them to the Company's attention and make sure they are addressed.

Significant Underlying Policies:

Employee Non-retaliation Policy

Treatment of Each Other at Work Policy

Q *I want to raise a complaint about my supervisor, who is mistreating me, but he is a higher ranking employee than me and I am afraid of the consequences if he finds out that I have complained about him. Will Cummins protect me?*

A Yes. Cummins protects all employees who raise concerns in good faith. We prohibit all retaliation and will not allow any employee to be punished for reporting concerns. Cummins will investigate your concerns as confidentially as possible and will take appropriate action.

Living the Code

The Cummins Code of Business Conduct has been approved by our senior leadership and the Company's Board of Directors. The principles embodied in the Code are intended to guide our employees' treatment of one another, as well as their interaction with customers, suppliers, partners, public officials and other stakeholders.

Each of us has a stake in living the Code and in enforcing its rules and principles. In order for the Code to be effective, employees must understand that violations come with consequences – *up to and including termination of employment*. At the same time, employees must be confident that they can report violations of the Code to the proper individuals within the company without fear of retaliation and that their concerns will be fully investigated in a timely manner.

This point cannot be stressed too often: Cummins has a specific policy safeguarding employees against retaliation for reporting suspected violations of the Cummins Code of Business Conduct. Employees also have a variety of vehicles for reporting their concerns, including – where allowed by law – anonymous reporting. (See *Resources and Contact Information for details on ethics violations reporting options*.)

The principles established in the Cummins Code of Business Conduct are meant to stand the test of time, but their application should reflect the current business climate. Toward that end, the Company will seek feedback from employees as part of an annual review, which will be used to update the Code as necessary. Additionally, most salaried employees are required to complete an annual ethics certification to confirm that they are familiar with the Code and have followed it completely.

Resources and Contact Information:

Corporate Policies: Go to MyCummins and click on the tab marked Our Company. You will see a link to “Corporate Policies.” This link will take you to an updated list where you can link to all the policies referenced in the Code of Business Conduct.

Human Resources: For Human Resources questions, please contact your local Human Resources leader. If you are not able to contact your local Human Resources leader, you can call Sondra Bolte, Director of Investigations (U.S. 812-377-5111; sondra.k.bolte@cummins.com) or Jill Cook, Vice President-Human Resources (U.S. 812-377-8442; jill.e.cook@cummins.com)

Corporate Communications:

Mark Land, Director-Public Relations
(U.S. 317-610-2456; mark.d.land@cummins.com).

Internal Audit:

Luther Peters, Executive Director, Internal Audit.
(U.S. 812-377-4594; luther.peters@cummins.com).

Law Department: Go to MyCummins and click on the tab “Tools and Resources.” Then click on the link marked “Legal Services” and you will find information and contact information for the Law Department staff. If you do not know which attorney to contact, you can send a Lotus Note to “Law Department” and you will be contacted by the appropriate attorney. Or you may contact Marya Rose, Vice-President and General Counsel (U.S. 317-610-2459; marya.m.rose@cummins.com).

Purchasing:

Ignacio Garcia, Vice President- Global Purchasing
(U.S. 812-377-1573; ignacio.garcia@cummins.com);
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Frequently Asked Questions

How do I find a current copy of the Cummins Code of Business Conduct?

Go to MyCummins and click on the tab marked Our Company. You will see a link to the Cummins Code of Business Conduct. The Code is reviewed and updated annually so always make sure to check MyCummins to make sure you have the most recent version. The Code also can be found under the “About Cummins” tab of the Company’s external web site www.cummins.com.

How do I contact EthicsPoint to report my concerns?

Go to your internet browser and type “ethics.cummins.com” and you will be directed to the EthicsPoint website. There, you will see a list of toll-free numbers for countries around the world that you can call to report your concerns. Or, you can file your report on-line through the website from anywhere in the world. If you wish, you can make your report anonymously.

How do I know if the Cummins Code of Business Conduct applies to me?

The Cummins Code of Business Conduct applies to all Cummins Inc. employees, officers and directors. The Cummins Code of Business Conduct also applies to all entities wholly owned by Cummins and all entities that Cummins directly manages. However, Cummins also is a partial owner of certain joint ventures and distributors. For these entities not directly controlled by Cummins, this Code may not apply. However, those entities are responsible for creating a set of policies and procedures that ensure that the entity follows the law and the same values as Cummins Inc. Cummins also makes sure that it chooses joint venture partners that share the values embodied in the Cummins Code of Business Conduct.

Frequently Asked Questions

contact, simply send a Lotus note to “Law Department” with your question and you will be contacted by the appropriate lawyer.

How does Cummins provide training to employees on the Code of Business Conduct?

Most salaried employees will receive training through an on-line training course that is automatically provided to employees. Cummins generally provides face to face training to hourly (shop) employees through local management or human resources. If you are interested in additional training on the Code of Business Conduct, please contact human resources or send a Lotus Note to “Law Department” for more information.

Where can I find a current copy of the Supplier Code of Conduct?

Go to MyCummins and click on the tab marked Our Company. You will see a link to “Corporate Policies.” There you will find a

How do I contact the Cummins Law Department?

Go to MyCummins and click on the tab - Tools and Resources. Then click on the link marked “Legal Services” and you will find information including contact information for the Law Department staff. If you do not know which lawyer you should

I am Cummins.

I know what my company stands for. I am ready to carry out its mission of returning value to our customers, shareholders and communities—and to be a good steward of the environment along the way. I bring my own unique perspective to work every day, as do thousands of my colleagues around the world. Together we create a rich diversity of cultures and views. I understand my company's vision includes all the communities we serve around the globe, not just my own. And I believe my success will contribute to the success of everyone we serve, everywhere. I am Cummins. You can depend on me.



Code of Business Conduct

Ethics Driven – Every Time

Ethics Help-Line 1-800-671-9600 | ethics.cummins.com