



# Conflicts of Interest Policy

## SCOPE

This policy applies globally to the employees of Cummins entities in which Cummins has a controlling ownership interest or management responsibility, including our subsidiaries, joint ventures, affiliated companies, and distributors. If Cummins does not have a controlling ownership interest or management responsibility in an affiliated entity, then Cummins will take reasonable steps to require compliance with this policy and the law.

## POLICY

When working for Cummins, you are expected to be honest and do what’s right for the company. Having personal relationships, investments, or activities that could prevent you from doing what is best for Cummins is a conflict of interest and must be avoided. It is your duty to make fair and objective decisions at work and to avoid any actions or situations that could or could appear to, improperly influence you.

### 1. Understanding Conflicts of Interests

Conflicts of interest can be in many forms. This policy provides examples of everyday situations where a conflict of interest (or the appearance of a conflict) may arise and outlines how to address them.

If a conflict of interest exists, might look like it exists, or if you are unsure – you must report it through the [Conflicts of Interest Disclosure Tool](#) and tell your manager. Cummins expects non-Cummins employees to disclose conflicts of interest directly to their employers.

*Select a conflict type to go directly to its section in this policy.*

<a href="#">Personal Relationships</a>	<a href="#">Personal Investments and Financial Interests</a>
<a href="#">Outside Business Activities</a>	<a href="#">Business Courtesies</a> (e.g., meals, gifts, and entertainment)
<a href="#">Corporate Opportunities</a>	

See the [Your Disclosure Obligations](#) section below to learn when to disclose, what to do if your circumstances change, where to find examples and manager guidance.



## 2. Types of Conflicts and Expectations

### A. Personal Relationships

**You must make sure that your personal relationships do not – and will not – affect your ability to make fair decisions at work.**

Working with people you know outside of work or having personal ties with individuals working for Cummins' competitors or suppliers, for example, can create a conflict of interest or give the appearance of one. Even if nothing improper happens, these relationships may raise concerns about fairness, confidentiality, favoritism, or other unprofessional behavior.

If your Close Connection works for or has a board service role with Cummins, a Cummins competitor, a company that does business with Cummins, or is a government official that Cummins interacts with within the course of its business operations, you must report it.

A **"Close Connection"** includes your Family Members, romantic partners, close friends, business partners, and people with whom you have a long-term social or business relationship outside of your work for Cummins. This includes co-workers at Cummins who have become your friends outside of work.

**"Family Members"** include anyone related to you by blood, marriage, or law or those sharing the same household. This includes, but is not limited to, children, parents, siblings, in-laws, current or former spouses, domestic partners, stepfamily, and adopted relatives.

The following situations also require approval before proceeding:

- You cannot conduct business or make decisions for Cummins with any company where a Close Connection works unless you disclose the relationship and get approval.
- You cannot make or influence work-related decisions (such as hiring, pay, discipline, performance management, or promotions) for a Close Connection or supervise them at any level without prior disclosure and approval. You cannot be a direct supervisor or manager at any level of a Close Connection's reporting chain without prior disclosure and approval. Personal relationships in the workplace must also follow the [Treatment of Each Other at Work Policy](#).

To meet the disclosure requirements, see [Your Disclosure Obligations](#) below for more details.

## **B. Personal Investments and Financial Interests**

**You must avoid any personal Financial Interest that could affect your work, influence your decisions, or seem like a conflict of interest.**

A “**Financial Interest**” is anything that has or could have monetary value.

Examples of Financial Interests include investments, shares, stocks, bonds, payment (current or future), stock options, or any other arrangement that could lead to personal financial gain or prevent a financial loss. These interests can be held by you or your Close Connection and include interests held through a business that you or your Close Connection own, control, or manage.

Having a Financial Interest in a company that does business with Cummins or is Cummins’ competitor can raise concerns. This can make your decisions appear unfair, create legal and compliance risks, or simply seem improper – even if no wrongdoing occurs.

To avoid potential conflicts of interest related to Financial Interests, the following guidelines apply:

- You must disclose and receive approval to have Financial Interests in companies that have a business relationship with Cummins or compete against Cummins.
- If your Close Connection owns more than five percent (5%) of the stock (listed or unlisted) or other Financial Interest of a company that has a business relationship with Cummins or competes against Cummins, you must disclose it.
- You cannot be involved in any business activity between Cummins and a company where you or your Close Connection has a Financial Interest, nor can you attempt to influence Cummins’ decisions about the company without prior disclosure and approval.

To meet the disclosure requirements, see [Your Disclosure Obligations](#) below for more details.

Note – Disclosure is not required for investments held in mutual funds where you do not influence fund management.

## **C. Outside Business Activities**

**You must avoid Outside Business Activities that interfere or conflict with your Cummins work responsibilities.**

An “**Outside Business Activity**” refers to work you do outside of your role at Cummins. This includes Secondary Employment, Board Service, or any other external activity where you provide personal goods or services– even while on leave. These activities are defined below.



- **“Secondary Employment”** is an Outside Business Activity that means working for another company, organization, or yourself while working for Cummins. This can include part-time, temporary, or contract work.
- **“Board Service”** is an Outside Business Activity that refers to serving as a board or committee member, officer, director, trustee, or advisor for a corporation, LLC, non-profit, agency, trade or industry association, joint venture, or other business entity – whether paid or unpaid.

Outside Business Activities can cause conflicts of interest, negatively impact your job performance, raise reputational concerns, or risk the misuse of company resources and confidential information. The risks are even higher when the Outside Business Activity involves a competitor, customer, supplier, or other companies connected to Cummins’ business.

You must disclose Outside Business Activities if any of these situations apply:

- The Outside Business Activity involves a company that has, or actively seeks to have, a business relationship with Cummins or is a competitor of Cummins.
- The Outside Business Activity requires work during your normal business hours or that interferes with your schedule and responsibilities for Cummins.
- Your involvement in the Outside Business Activity requires decision-making that could impact your job at Cummins.
- The Outside Business Activity (paid or unpaid) poses a conflict of interest and/or creates the appearance of a conflict of interest.

Board Service Requirements - in addition to the obligations above, you must disclose and receive approval before accepting a Board Service role with:

- Any publicly traded or listed company, regardless of its business relationship with Cummins.
- Any organization whose activities relate to Cummins’ business (e.g., advisory groups, trade associations, etc.).
- Any organization if you hold an officer-level position within Cummins.

To meet the disclosure requirements, see [Your Disclosure Obligations](#) below for more details.

Cummins can deny approval or set conditions on your Outside Business Activity if it creates or seems to create a conflict of interest, negatively affects your job performance, reflects adversely on Cummins, or limits when you can work at Cummins. If the Outside Business Activity is denied, you cannot accept or continue it. If you are required to stop any activity, you must inform your manager once it has ended.

Approved Outside Business Activities can never be an excuse for poor job performance, being unresponsive, missing work, being late, leaving early, or refusing to travel or work extra hours when needed. If an Outside Business Activity is approved, you cannot use Cummins’ resources for personal business activities. For the complete guidelines, refer to the [Company-Owned Business Resources Usage Policy](#).



## D. Business Courtesies

**You may only give or accept Business Courtesies that do not influence or appear to influence the strictly commercial nature of any business transaction.**

A “**Business Courtesy**” is any item, hospitality, or favor given or received with a specific business purpose where the recipient does not pay the fair market value. A Business Courtesy may include a gift or gift certificate, ticket, meals, drinks, entertainment, and promotional items. It may also include the use of a donor’s time, materials, facilities, equipment, vacation facilities, etc.

Business Courtesies must be of nominal value, appropriate, infrequent, legal where they’re given or received, and not likely to influence a recipient’s judgment.

Business Courtesies can create a conflict of interest for Cummins if they are given or received to unfairly gain business, influence decisions, or create a sense of obligation in return. When given or received for an improper purpose, Business Courtesies go against Cummins’ commitment to conduct business ethically, honestly, and with the utmost integrity. In these cases, Business Courtesies not only violate this policy but also Cummins’ [Anti-Bribery and Prohibited Payments Policy](#).

You should never ask for a Business Courtesy. **Before** giving or accepting any Business Courtesy, you must comply with the limits and approval requirements in the [Meals Gifts Entertainment Travel Procedure](#), disclose it, and request approval. Business Courtesies to a [Government Official](#) must also follow the [Anti-Bribery and Prohibited Payments Policy](#).

Business Courtesies given to or by Cummins employees belong to Cummins. Family Members of employees should not give or accept Business Courtesies from customers, suppliers, or other companies doing business with Cummins if it is related (directly or indirectly) to the employee’s job or could create a conflict of interest.

To meet the disclosure requirements, see [Your Disclosure Obligations](#) below for more details.

## E. Corporate Opportunities

**You must not compete with Cummins or take advantage of a Corporate Opportunity that could benefit Cummins.**

A “**Corporate Opportunity**” is any potential investment, project, or deal that an employee learns about through their job at Cummins. This includes opportunities discovered through Cummins’ resources, business relationships, or access to confidential information.

Taking Corporate Opportunities (whether for yourself or helping others take them) could create a conflict of interest, provide unfair advantages, or risk the misuse of company resources and confidential information or appear to do so.

If you learn about a Corporate Opportunity, you must not take the opportunity for yourself or give the opportunity to a Close Connection without first disclosing it and obtaining approval. Upon disclosure, Cummins will review the situation to determine the best course of action.



Below are examples of actions that would be an improper use of a Corporate Opportunity:

- You learn that a Cummins customer wants a service provided by Cummins, but you offer to do the work privately for a lower cost.
- Using information that you learn about at work to find industry gaps and telling your Close Connection to start a business to profit from the opportunity.

To meet the disclosure requirements, see [Your Disclosure Obligations](#) below for more details.

### 3. Your Disclosure Obligations

All possible conflicts of interest must be reported through the [Conflicts of Interest Disclosure Tool](#) and to your manager, following the rules below, even if you are unsure whether a conflict exists.

You must disclose:

- **When you are hired** – if any actual, potential, or perceived conflicts of interest exist at the time of onboarding.
- **At any time during your employment** – as soon as you become aware of a new, actual, potential, or perceived conflict of interest, including situations where you are unsure.
- **Within 30 days of a change** – if any information or circumstances related to your previously disclosed situation change.
- **During the Annual Ethics Certification (where applicable)** – employees will be required to confirm the status of any previously disclosed conflicts.
- If you engage in a Cummins business transaction involving a former Cummins employee (or their known Family Member).

When a potential conflict is disclosed or discovered, Cummins will review the situation and determine the best course of action. You are responsible for making new or additional disclosures as the scope of Cummins' business and competitors change.

Cummins may periodically request information regarding conflicts of interest from employees. Employees selected for participation must respond by disclosing unreported potential conflicts or confirming that no conflicts exist.

Cummins' Ethics and Compliance function will maintain records of all reported disclosures.

**Need help?** For answers to frequently asked questions, examples, evaluation guidance for managers, and details on the disclosure process, visit the [Conflicts of Interest SharePoint](#) site.

## CONSEQUENCE FOR POLICY VIOLATION

Individuals who violate this policy or related policies may be subject to disciplinary action up to and including termination. Company consequences may include substantial harm to our business reputation and harm to our ability to conduct normal business operations.



## CONTACT FOR MORE INFORMATION

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

- Your Manager / Business Leader
- [Ethics and Compliance Function](#)
- [The Cummins Legal Function](#)
- [Human Resources](#)

### You can also report concerns through the Ethics Help Line.

If you are not comfortable taking your concerns to the above resources or your concern isn't addressed by the above, you can report your concern to the Cummins Ethics Help Line at [ethics.cummins.com](http://ethics.cummins.com). On this website, you can find information on how to report your concern online or by phone. In addition, this site offers multiple languages with which you can report your concerns. You may also use the camera on your mobile device to scan the QR code, and you will be directed to [cumminsmobile.ethicspoint.com](http://cumminsmobile.ethicspoint.com) to report your concern.



You may report your concerns anonymously where allowed by law.

### Cummins strictly forbids retaliation against employees who report concerns

No action will be taken against you for reporting your concerns. Refer to the [Employee Non-Retaliation Policy](#) for more information.

## ASSOCIATED DOCUMENT AND RESOURCE LINKS

[Policy Translations](#)

[Conflicts of Interest – Frequently Asked Questions and Evaluation Guidance](#)

[Treatment of Each Other at Work Policy CCP-0006](#)

[Company-Owned Business Resources Usage Policy CORP-10-01-06-00](#)

[Anti-bribery and Prohibited Payments Policy CCP-0001](#)

[Meals Gifts Entertainment Travel Procedure](#)