(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.

Cummins believes in partnering with others to achieve innovation in its products. We partner with many academic institutions, nongovernmental organization and government entities on new product technology and policy advocacy. Some current examples of partnership with the U.S. Department of Energy are 1) the SuperTruck II program with Peterbilt and Eaton to demonstrate advanced engine, drivetrain, and vehicle technologies for Class 8 line-haul trucks and 2) an advanced platooning project (in conjunction with National Renewable Energy Laboratory, Michelen and Clemson University) to assess real-world fuel savings potential and actively address barriers to widespread market acceptance of platooning.

C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?
- Direct engagement with policy makers
- Trade associations

C12.3a

(C12.3a) On what issues have you been engaging directly with policy makers?

<table>
<thead>
<tr>
<th>Focus of legislation</th>
<th>Corporate position</th>
<th>Details of engagement</th>
<th>Proposed legislative solution</th>
</tr>
</thead>
<tbody>
<tr>
<td>please specify (Climate change)</td>
<td>Cummins has worked with EPA and industry to provide feedback in EPA’s Cleaner Trucks Initiative Advanced Notice of Proposed Rulemaking to lower the NOx standard for HD On Highway Engines.</td>
<td>The focus of legislation is on how comprehensive climate change policy can drive cleaner solutions for the segments in which Cummins products operate.</td>
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<td>--------------------------------</td>
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<tr>
<td>Other, please specify (Air quality)</td>
<td>Support</td>
<td>Cummins executives have testified in front of the House Select Committee on Climate Crisis and the House Energy and Commerce Environment and Climate Change Subcommittee on how comprehensive climate change policy can drive cleaner solutions for the segments in which Cummins products operate.</td>
<td></td>
</tr>
<tr>
<td>Energy efficiency</td>
<td>Support</td>
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</tr>
<tr>
<td>Energy efficiency</td>
<td>Support</td>
<td>Cummins is a member of Department of Energy Better Buildings, Better Plants Program and is active in various industrial energy efficiency groups, both sector specific and general at national and regional levels.</td>
<td>We promote and model industrial energy efficiency practices and are active with several government programs for energy efficiency.</td>
</tr>
<tr>
<td>Energy efficiency</td>
<td>Support</td>
<td>Cummins pledged support for a new Energy Management Campaign. This campaign is an effort of CEM and the International Partnership for Energy Efficiency Cooperation to spur international collaboration with a goal of 50,001 global certifications by 2020. Cummins will achieve ISO 50001 certification at a total of 40 sites by 2020. These 40 sites represent 90 percent of Cummins’ energy footprint.</td>
<td>This campaign is an effort of CEM and the International Partnership for Energy Efficiency Cooperation to spur international collaboration with a goal of 50,001 global certifications by 2020.</td>
</tr>
</tbody>
</table>

**C12.3b**

**(C12.3b) Are you on the board of any trade associations or do you provide funding beyond membership?**

Yes

**C12.3c**

**(C12.3c) Enter the details of those trade associations that are likely to take a position on climate change legislation.**

| Trade association | Advanced Energy Economy |

**Is your position on climate change consistent with theirs?**

Consistent

**Please explain the trade association’s position**
How have you influenced, or are you attempting to influence their position?
We are in agreement with their position.

**Trade association**
China Internal Combustion Engine Industry Association

Is your position on climate change consistent with theirs?
Mixed

Please explain the trade association’s position
Without comprehensive national climate change legislation, the Company cannot determine the association’s position at this time. The association supports national efforts to reduce fuel consumption.

How have you influenced, or are you attempting to influence their position?
Cummins has worked within CICEIA on fuel consumption activities, NS VI emission standard readiness and how to ensure industry-wide compliance in China.

**Trade association**
Confederation of Indian Industry

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association’s position
The trade association supports international cooperation on climate change with nationally-determined pledges. Without comprehensive national climate change legislation, the Company cannot determine this group's position at this time.

How have you influenced, or are you attempting to influence their position?
Cummins works actively within the Confederation of Indian Industry (CII) to build consensus about the business value of addressing climate change and to advocate for stricter emissions standards. The Company's Vice President and Chairman of Cummins India Limited chairs CII’s Manufacturing Committee and the Vice President of Indian Government Relations serves on CII's National Committee on the Environment, both of which influence the association’s position. CII advocates for the industry’s viewpoint on climate change to the Indian Foreign Ministry and Ministry of Environment, Forest and Climate Change through direct lobbying opportunities such as the COP21 negotiations in Paris in 2015.

**Trade association**
The Diesel Technology Forum

Is your position on climate change consistent with theirs?
Consistent
How have you influenced, or are you attempting to influence their position?
Cummins works actively in the DTF to encourage it to be supportive of fuel economy in vehicles and of energy efficiency programs in our sector.

Trade association
The Engine Manufacturers Association

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association's position
EMA supports effective rulemaking to promote the most advanced technologies, and significant funding to promote alternative fuel infrastructure, research, development and deployment.

How have you influenced, or are you attempting to influence their position?
Cummins works actively in the EMA to encourage it to be supportive of engine efficiency and of energy efficiency programs in our sector.

Trade association
The National Association of Manufacturers

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association's position
NAM supports the goals of the Paris Climate Agreement and supports a market-based mechanism to internalize the social cost of carbon.

How have you influenced, or are you attempting to influence their position?
Cummins works actively in NAM to encourage it to be supportive of fuel economy in vehicles and of industrial energy efficiency programs in our sector. The company is encouraging the organization to work more collaboratively with the EPA. Cummins’ chief operating officer is on the board of directors.

Trade association
U.S. Chamber of Commerce

Is your position on climate change consistent with theirs?
Consistent

Please explain the trade association's position
The Chamber of Commerce supports the goals and US participation in the Paris Climate Agreement.
Trade association
The American Trucking Association

Is your position on climate change consistent with theirs? 
Consistent

Please explain the trade association’s position
Cummins works with ATA to encourage regulatory and legislative programs to reduce CO2 and NOx emissions from trucks.

How have you influenced, or are you attempting to influence their position? 
Cummins works actively in the ATA to encourage it to be supportive of fuel economy in vehicles and of energy efficiency programs in our sector

Trade association
The Business Roundtable

Is your position on climate change consistent with theirs? 
Consistent

Please explain the trade association’s position
BRT supports the goals of the Paris Climate Agreement and supports a market based mechanism to internalize the social cost of carbon.

How have you influenced, or are you attempting to influence their position? 
Cummins has been a voice for climate change action in the BRT for more than a decade.

Trade association
The Hydrogen Council, the US Fuel Cell Hydrogen Energy Association, the California Hydrogen Business Council and Hydrogen Europe

Is your position on climate change consistent with theirs? 
Consistent

Please explain the trade association’s position
The Hydrogen Council and regional Hydrogen and Fuel Cell Associations support policies globally that encourage adoption of clean hydrogen and fuel cell technology to address climate change.

How have you influenced, or are you attempting to influence their position? 
Cummins is an active participant in the Hydrogen Council, with Cummins’ CEO serving on the Board, and regional associations promoting policies that encourage clean hydrogen and fuel cell technology adoption to address climate change.
(C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

The Company has several groups and processes in place to ensure that our advocacy is consistent with our environmental and climate strategies. A Cummins team called Environmental Policy & Strategic Planning exists to analyze major environmental strategic opportunities and risks that affect the company globally; direct work with internal and external stakeholders to shape stances and positions on environmental affairs that impacts Cummins; and coordinate efforts across complex environmental issues to ensure consistency and adherence to our environmental and climate strategies across all activities including public policy advocacy. This team uses robust processes and guiding principles to direct Cummins’ environmental policy actions. Whether the policy we are influencing is a regulation that focuses on reducing criteria pollutants, greenhouse gas emissions (GHG) or improving fuel efficiency, Cummins’ policy principles ensure that we always advocate for tough, clear, and enforceable policy. These principles and our environmental mission apply to all direct and indirect activities including external relations, partnerships, and advocacy.

In addition to our environmental policy principles and processes, the Action Committee for Environmental Sustainability (ACES) shapes the activities and goal-setting of the stakeholder areas for product in use and in design, facilities and operations, internal supply chain (logistics and packaging), employee engagement and communications and marketing. Through processes such as monthly meetings, goal tracking, and disclosure, ACES ensures that the 10 environmental sustainability principles listed below are used to develop and adhere to Cummins’ climate strategy, whether internal Company actions or external engagement.

The Company has 10 environmental sustainability principles - with the last four focusing on policy:
- Develop clean, efficient products
- Grow and develop new businesses
- Develop environmentally sustainable supply chains
- Make work spaces green spaces.
- Harness the energy of employees
- Engage in the community
- Help develop responsible regulations.
- Promote technology development.
- Advocate for incentives to accelerate progress