

**FLEETGUARD UK LIMITED**  
**DISCLOSURES PURSUANT TO THE TRANSPARENCY IN SUPPLY CHAINS PROVISION IN**  
**THE MODERN SLAVERY ACT**

**INTRODUCTION**

Founded by Cummins in 1958, but independent in 2023, Atmus Filtration Technologies Inc. and its subsidiaries (“Atmus”) continue to build on a 65-year history, differentiating ourselves through a vast global footprint, comprehensive portfolio of premium products, technology leadership and multi-channel path to market. We are proud of our longstanding commitment to integrity and the highest ethical standards.

At Atmus, we respect human rights wherever we operate. We are guided by international human rights principles, including the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights to ensure that all people across our operations are treated with dignity and respect. We are committed to protecting human rights by:

- supporting fair employment practices—we follow applicable local laws and regulations related to wages, work hours, benefits, and working conditions;
- respecting the freedom of association of our employees and recognizing the right to collective bargaining;
- prohibiting the use of child labor, forced or prison labor, and human trafficking; and
- responsibly sourcing our materials and partnering with suppliers who share our principles.

At Atmus, we respect and protect human rights because it is the right thing to do.

**COMPANY STRUCTURE, BUSINESS AND SUPPLY CHAIN**

Fleetguard UK Limited is a UK-registered wholly owned subsidiary of Cummins Filtration Inc., and Cummins Filtration Inc. is a wholly owned subsidiary of Atmus Filtration Technologies Inc., which is a publicly traded company on the New York Stock Exchange as of May 26, 2023 (NYSE: ATMU). The entities will be collectively referred to as “Atmus.”

Atmus is a global leader in filtration solutions for on-highway commercial vehicles and off-highway agriculture, construction, mining and power generation vehicles and equipment. Through its subsidiary Cummins Filtration Inc., Atmus designs and

manufactures advanced filtration products, principally under the Fleetguard brand, that enable lower emissions and provide superior asset protection. Atmus develops technologies ranging from filtration media, filter element formation and filtration systems integration to service-related solutions such as remote digital diagnostic and prognostic platforms and analytics.

The performance of the end-to-end supply chain, extending through to Atmus' suppliers, is foundational to our ability to meet customers' expectations and support long-term growth. Atmus is committed to having a robust strategy for how it selects and manages its suppliers to enable a market focused supply chain. This requires us to continuously evaluate our supply base, as we strive to ensure we are meeting the needs of our customers. Our sourcing strategy is guided by a review of our long-term needs and the establishment of strong business partnerships.

In 2023, the principal materials that Atmus used directly in manufacturing our products are steel, filter media and petrochemical-based products, including plastic, rubber and adhesives products. Additionally, we procured paper, electronic components and finished filters. Our supply chains consisted of suppliers predominately located in the United States, Europe, China, and India in the automotive, manufacturing, and energy industries.

### **ATMUS HUMAN RIGHTS POLICIES**

The Atmus Code of Conduct (the "Atmus Code") provides that Atmus is committed to protecting human rights by prohibiting the use of child labor, forced or prison labor and human trafficking. Atmus also maintains a separate Human Rights Policy, which applies globally to employees of Atmus entities, including its subsidiaries. As set forth in the Human Rights Policy, Atmus and its employees:

- do not tolerate any form of forced labor, including slave or indentured labor, bonded labor, military labor, prison labor, and human trafficking;
- prohibit trafficking-related activities connected to our employment contracts and subcontracts;
- prohibit the use of child labor,
- comply with all local applicable laws and regulations related to wages, work hours, overtime, benefits and working conditions,
- respect the freedom of association of our employees and recognize the right collective bargaining,

- respect the communities where we operate including the internationally recognized human rights of Indigenous Peoples; and
- responsibly source our materials and partner with suppliers who share our principles.

If an Atmus employee, contractor, or third party suspects or becomes aware of an actual or potential human rights abuse, Atmus' various speak up resources are available. As set forth in the Human Rights Policy, employees are encouraged to raise concerns with their supervisor or business leader, Human Resources, Internal Audit, the Atmus Legal team, the Atmus Ethics & Compliance team, or by raising the concern to the Atmus Ethics Line. The Ethics Line is open to Atmus employees and third parties, such as suppliers, contractors, customers, and the general public. Atmus does not tolerate retaliation against anyone who raises a concern in good faith or cooperates with an investigation.

Likewise, Atmus suppliers are required to acknowledge and adhere to the Atmus Supplier Code of Conduct (the "Supplier Code"), which includes a prohibition against child labor, forced or prison labor or human trafficking. Atmus suppliers are required to complete a Supplier Code of Conduct survey to confirm their compliance and alignment with the Supplier Code prior to engaging in any business with Atmus and on an annual basis. Atmus suppliers are advised that Atmus expects them to participate in required training and survey requests to verify compliance with the Supplier Code. Noncompliance or misrepresentation of compliance by a supplier may result in termination of the Supplier's contract or legal action.

## **DUE DILIGENCE**

Atmus considers the risk of child and forced labor occurring within its operations to be low considering its workforce, robust policies and procedures intended to prohibit forced labor within Atmus and its supply chain partners, the expectations set forth in the Atmus Code of Conduct and Atmus Supplier Code of Conduct, and Atmus' commitment to the ethical treatment of its employees. Despite identifying its risk as low, Atmus takes steps to mitigate potential risks of forced or child labor in its operations and supply chains.

### ***Supplier audits***

To verify that suppliers remain in compliance with the Supplier Code, Atmus conducts an annual compliance audit of its top 80% suppliers (by spend) – including both direct

and indirect suppliers. The audit process requires that Atmus supplier compliance leaders issue a Supplier Code compliance survey, monitor responses and take necessary actions to address supplier noncompliance, which may include the preparation of a compliance plan for the supplier at issue or a plan to cease business with the supplier.

Additionally, Atmus conducts an audit during visits of suppliers in the following regions: China, India, Brazil, Mexico, Turkey, Malaysia, Singapore, Thailand, Vietnam, Eastern European countries, and African regions of Angola, Botswana, Mozambique, South Africa, Zambia, Zimbabwe, Ghana, Nigeria and Senegal. Per Atmus policy, an annual risk assessment is conducted to determine which suppliers require onsite audits. The informal audit is conducted by Atmus personnel, who prepares a report of the audit findings. Any findings of noncompliance will be relayed to the appropriate Atmus personnel and addressed directly with the supplier. If any inappropriate behaviors or conditions viewed as systemic or critical are observed during the audit, the situation is reviewed with the Atmus Legal, Ethics and Compliance team for appropriate action.

### ***Supplier Certifications***

Atmus suppliers are required to acknowledge and adhere to the Atmus Supplier Code of Conduct (the "Supplier Code"), which includes a prohibition against child labor, forced or prison labor and human trafficking. Atmus suppliers are required to complete a Supplier Code of Conduct survey to confirm their compliance with the Supplier Code prior to engaging in any business with Atmus and on an annual basis.

Adherence to the Supplier Code is also included as a specific provision in the Atmus Purchase Order Standard Terms & Conditions (the "Terms").

### ***Policies and Procedures***

Policies and procedures implemented by Atmus to mitigate the risk of forced labor include the following:

- Atmus Code of Conduct
- Atmus Supplier Code of Conduct
- Conducting Eyes Open Audits Procedure
- Atmus Collecting Supplier Code of Conduct Responses Procedure
- Atmus Human Rights Policy

Atmus expects all employees, contractors, supply chain partners and other business partners to comply with the Atmus Supplier Code of Conduct and join Atmus' commitment to ensure human rights and prohibit all forms of forced labor and human trafficking.

### **EFFECTIVENESS**

Atmus measures the effectiveness of its risk mitigation efforts related to forced labor by confirming that its suppliers complete a Supplier Code of Conduct survey to confirm their compliance with the Supplier Code prior to engaging in any business with Atmus and on an annual basis. Atmus continuously monitors supplier compliance by conducting its annual Supplier Survey audit and conducting audits during supplier visits in certain regions.

Atmus also includes as specific provisions in the Atmus Purchase Order Standard Terms & Conditions (the "Terms") the requirement that suppliers (1) comply with the Supplier Code and (2) warrant and certify that none of the supplier's Products are or will be manufactured with child, indentured, forced or prison labor.

Atmus also encourages the reporting of suspected violations. If an Atmus employee, contractor, or third party suspects or becomes aware of an actual or potential human rights abuse, Atmus' various speak up resources are available. As set forth in the Human Rights Policy, employees are encouraged to raise concerns with their supervisor or business leader, Human Resources, Internal Audit, the Atmus Legal team, the Atmus Ethics & Compliance team, or by raising the concern to the Atmus Ethics Line. The Ethics Line is open to Atmus employees and third parties, such as suppliers, contractors, customers, and the general public. Atmus actively monitors the Ethics Line and ensures that prompt and thorough investigations are conducted. If any violation of Atmus policies is confirmed during an investigation, Atmus will take immediate and appropriate action.

### **TRAINING**

Atmus requires that all employees comply with the Atmus Code of Conduct, which includes provisions prohibiting forced or child labor. Atmus also provides Code of Conduct training, which is mandatory for all new Atmus employees and then required for all employees on an annual basis. The Code of Conduct Training includes a section entirely dedicated to human rights.

*James McKenna*

James McKenna (Dec 11, 2024 12:56 GMT)

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Robert James McKenna  
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