



OSHKOSH CORPORATION

Oshkosh Corporation Supplier Code of Conduct



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Introduction

Oshkosh Corporation has a reputation for upholding our core values of Honesty, Integrity, Accountability, Respect and Citizenship. Our reputation is dependent on the way we conduct our business. Just as we require our employees to conduct themselves in a manner consistent with our core values, we also expect you, as a critical part of Oshkosh Corporation's Value Chain, to act in a similar manner.

This Supplier Code of Conduct details the requirements and expectations that we have of ourselves and our suppliers. Oshkosh Corporation expects its suppliers to have a clear understanding of our expectations and to comply with them in business practice. (The term 'suppliers' is used throughout this document to include vendors, contractors and consultants, and any of their employees or subcontractors.) All suppliers are expected to read and fully comply with the principles in this Supplier Code of Conduct as a condition of doing business with Oshkosh Corporation.

The Oshkosh Way documents Oshkosh Corporation's Code of Ethics and Standards of Conduct. The principles and requirements outlined in *The Oshkosh Way* apply to all of Oshkosh's suppliers where a supplier lacks its own code of ethics or its code contradicts or ignores any specific provision of *The Oshkosh Way*. Unless local law limits a provision, or it specifically says otherwise, there are no exceptions to any of the principles or requirements of the Code.

If, in the course of business with Oshkosh Corporation, you see an Oshkosh Corporation employee or supplier engaged in known or suspected unethical behavior or legal violations, we encourage you to contact the Code Connection HotLine. All calls to the HotLine are confidential. The HotLine is managed by an independent third-party provider and is available around the clock.

Oshkosh Corporation thanks you for your cooperation, and we look forward to our continued business relationship.

ETHICAL EXPECTATIONS OF SUPPLIERS

The following information explains Oshkosh Corporation's expectations regarding the workplace standards and business practices of our suppliers. These expectations are consistent with *The Oshkosh Way*. The information summarized in the Oshkosh Supplier Code of Conduct is not exhaustive, and as such, there may be other conduct not specifically described that will be considered unacceptable for a supplier.

Compliance with Laws

All standards set forth in this Code of Conduct are subject to compliance with applicable local laws. We expect our suppliers to operate in full compliance with the laws of their respective country, as a minimum. If any requirement that we impose in the Supplier Code of Conduct conflicts with local laws, the law takes precedence. Should this occur, the supplier must promptly inform Oshkosh Corporation of the conflict.

Suppliers will not violate, misappropriate or infringe upon intellectual property rights of Oshkosh Corporation and its subsidiaries or any third party, or engage in activities that would violate any applicable laws and regulations related to:

- bribery or illegal payments
- laws against unfair competition
- unfair or deceptive trade practices
- the environment
- health and safety
- international trade, including imports and exports
- data privacy
- money laundering
- employment
- contracting with government entities

Compliance with US Government Requirements/Restrictions

As a supplier to Oshkosh, a government contractor, you may be subject to additional requirements or restrictions imposed by the US Government, including, but not limited to, the Federal Acquisition Regulation (FAR) and Defense Federal Acquisition Regulation Supplement (DFAR). Please refer to the Oshkosh Supplier Standards Guide for additional details.

Accounting Records

Supplier must create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements. Accounting records must, in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses.

Working Environment

Suppliers will provide employees with a safe and healthy workplace consistent with all applicable laws and regulations. Suppliers will endeavor to meet or exceed international safety standards.

Environment

Suppliers should provide goods and services in an environmentally conscientious manner by seeking ways to conserve energy and natural resources and minimizing any adverse impact on the environment. Suppliers will comply with all applicable national legislation, regulations and industry standards.

Employment Standards

Suppliers will treat their employees with respect and dignity. Under no circumstances may any employee be subject to corporal punishment or other forms of physical, verbal, sexual or psychological harassment or abuse in connection with their employment. Employees shall also be free to exercise their legal rights of free association.

Discrimination

Suppliers shall not discriminate against their employees or applicants for employment with respect to compensation, terms, conditions or privileges of employment on the basis of race, color, religion, national origin, gender, age, disability, veteran status, marital status, citizenship status, creed, sexual orientation or other protected categories as provided by law.

Wages, Benefits and Work Hours

Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, and other elements of compensation, and will provide all legally mandated benefits. Supplier will maintain work hours in accordance with applicable laws and regulations, at a minimum, or in accordance with local industry standards.

Forced Labor

Suppliers will not use forced or involuntary labor whether in the form of prison labor, indentured labor, bonded labor or any other form of human trafficking.

Child Labor

Suppliers will comply with all applicable minimum age laws and requirements and will not employ child labor.

Subcontractors

All subcontractors must be disclosed to Oshkosh Corporation. Any subcontractor retained by an Oshkosh Corporation supplier must be in compliance with this Supplier Code of Conduct, and the supplier is responsible for ensuring its subcontractor's compliance.

Conflicts of Interest

Suppliers have a duty to timely disclose to Oshkosh Corporation all actual or potential conflicts of interest related to their business relationship with Oshkosh, as well as situations that could be perceived as a conflict of interest.

Gifts and Entertainment

Guidance related to gifts and entertainment is included in Section N of the Oshkosh Supplier Standards Guide. Suppliers are expected to comply with the guidance established within this policy and *The Oshkosh Way*.

MONITORING

Oshkosh Corporation's purchasing organization is responsible for supporting and evaluating suppliers and may engage in monitoring activities to assess compliance with this Code of Conduct including on site inspection of facilities and review of books and records. Oshkosh Corporation reserves the right to carry out unannounced inspections of suppliers either by internal Oshkosh Corporation staff or by a third party of Oshkosh's choice.

Any non-compliance with the Code must be reported and investigated to the extent necessary. Suppliers who do not meet the requirements of this Code will be provided with the opportunity to bring their business up to the Oshkosh Corporation standards in a reasonable time frame. Oshkosh Corporation reserves the right to terminate its business relationship with any supplier who fails to do so or refuses to comply with the Supplier Code of Conduct.

REPORTING CODE VIOLATIONS

Any person who believes that a violation of the Oshkosh Corporation Supplier Code of Conduct has occurred is asked to report the relevant information in confidence to the Code Connection HotLine.

The Code Connection Hotline [Available 24 Hours Per Day]

**Suppliers are encouraged to contact the Hotline with questions or concerns.
*Translation services are available.***

United States and Canada	866-554-3844
Australia	1-800-13-4749
Belgium	0800-7-5665
Brazil	0800-891-4414
China – North	10-800-711-7060
China – South	10-800-110-0702
Denmark	80-887125
France	0800-91-3705
Germany	0800-182-5408
Hong Kong	800-900542
Italy	800-788433
Netherlands	0800-022-1732
Norway	800-10156
Poland	0-0-800-111-1627
Romania (AT&T Direct Access Code)	080-803-4288 (800-566-8709)
Spain	900-97-1047
Sweden	020-79-7599
United Kingdom	0808-234-7588

A confidential and anonymous web reporting system is also available at www.tnwinc.com/reportline/Oshkosh.



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