

Non-Retaliation Policy

PURPOSE

Oshkosh Corporation and each of its subsidiaries (collectively referred to herein as the “Oshkosh”) is committed to conducting business in accordance with the highest ethical and legal standards. Employees may be concerned that reporting actual, potential, or perceived wrongdoings may subject them to retaliation or retribution. This policy is designed to ensure that everyone feels comfortable speaking up when s/he observes or suspects illegal or unethical behavior, without fear of retaliation.

SCOPE

Oshkosh believes that team members have the right to express his or her problems, concerns, and opinions on any issue and feel that those views are important. It is everyone’s responsibility to comply with and report violations or suspected violations of the Code of Conduct, Oshkosh policies, or any applicable laws, rules, or regulations. Oshkosh management, staff, employees, and others with whom we do business or may do business, shall not take retaliatory action against anyone who, in good faith, reports any wrongdoing, illegal, or unethical behavior. Oshkosh Corporation’s policy strictly prohibits retaliation.

POLICY

All employees are responsible for promptly reporting actual or potential wrongdoing, violations of law, rules, regulations, policy and/or procedure. Global Ethics and Compliance has an “Open Door Policy” to allow individuals to report any problems or concerns.

Retaliation against a person who files a good faith complaint or reports wrongdoing, participates in an investigation, or reports any illegal or unethical behavior, will not be tolerated. Any employee who participates in retaliation will be subject to serious disciplinary action, up to and including termination of employment.



Employees who, in good faith, report a problem, concern, or complaint, or participate in an investigation, remain subject to the same standards of performance and conduct as other employees. Additionally, no employee may be adversely affected because s/he refused to carry out a directive which constitutes fraud, or is a violation of local, state, federal, or other applicable laws and regulations. Retaliation is prohibited against any employee, even if his or her complaints are proven unfounded by an investigation.

An employee, who knowingly makes a false allegation, provides false or misleading information in the course of the investigation, or otherwise acts in bad faith will be subject to discipline, up to and including termination. Employees have an obligation to participate in good faith in any internal investigation, or any investigation of retaliation. Oshkosh takes all complaints seriously and all such complaints will be reviewed promptly, and where appropriate, investigated. Confidentiality regarding reported concerns and problems will be maintained at all times both legally and practically, informing only those personnel who have a need to know.

Employees who believe they have been retaliated against, or are aware of violations of policy, law, regulation and/or unethical behavior, should immediately notify your Supervisor, Location Manager, Human Resources, the Global Ethics & Compliance department call the Ethics Helpline at 1-866-554-3844, or submit a report through the EthicsHelpline web www.tnwinc.com/reportline/Oshkosh.