

Restricted Chemical Management Policy

Purpose

The policy establishes a framework for managing restricted chemicals into Oshkosh's environmental protection strategy. At Oshkosh Corporation, one of our core values is that "We Do the Right Thing." This core value includes doing the right thing with respect to managing restricted chemicals. It's our goal to reduce waste and emissions, minimize adverse environmental impacts and promote natural resource conservation at all our production, service and sales operations worldwide.

Scope

This policy applies to all Oshkosh company operations globally.

Definitions

EPA - US Environmental Protection Agency

EU - European Union

REACH - EU Registration, Evaluation, Authorization and Restriction of Chemicals directive (EC 1907/2006)

RoHS - EU Restriction of Hazardous Substances Directive (EC 2011/65)

TSCA - Toxic Substance Control Act

Policy

Oshkosh works to reduce, minimize or phase-out hazardous substances according to regulatory standards and customer requirements. Oshkosh's Restricted Chemical Management Program includes these principles:

1. Evaluation of global market requirements.

This includes evaluations of important standards including, but not limited to, EU RoHS Directive, EU REACH Regulation, California Proposition 65, China RoHS, US Toxic Substances Control Act (TSCA) and development of new requirements.

2. Avoid product risks through supplier chemical restrictions.

Suppliers are requested to disclose information related to restricted substance compliance. Oshkosh reviews its suppliers' component data, including certificates of compliance, statements of conformity, and other sources of supplier data.

3. Implement a restricted substance compliance program.

Oshkosh's actions include monitoring regulations and thresholds for restricted substances; and organizing the documentation needed to demonstrate compliance. Furthermore, Oshkosh engages with industry trade groups to ensure alignment and understanding with other compliance leads.

The following substances are prohibited per our Supplier Standards Guide: asbestos, cadmium, lead, mercury, hexavalent chromium, polychlorinated biphenyls, radioactive materials, or other highly toxic or carcinogenic materials without prior written approval.

4. Oshkosh utilizes a compliance management platform to manage supplier and component data, comply with regulations, manage supplier data.

Oshkosh has contracted with Assent Compliance for technical expertise and on-going collaboration and data management.