

English			
<b>OSHKOSH CORPORATION GLOBAL POLICY</b>		Approver	VP & Chief Ethics, Compliance and Sustainability Officer
Title	Anti-Bribery / Anti-Corruption Compliance	Responsible Party	Global Ethics & Compliance Director
Number	GBL-POL-LGL005-CHI	Last Revised	4/8/2022

Chinese			
<b>OSHKOSH CORPORATION 全球政策</b>		批准人	副总裁兼首席道德、合规与可持续发展官
标题	反贿赂/反腐败合规	责任方	全球道德与合规总监
编号	GBL-POL-LGL005-CHI	上次修订日期	4/8/2022

<b>PURPOSE</b>	<b>目的</b>
The purpose of this policy is to ensure that Oshkosh Corporation and each of its subsidiaries (collectively referred to herein as the "Company") comply with applicable anti-bribery and anti-corruption laws and regulations globally.	本政策的目的是确保 Oshkosh Corporation 及其所有子公司（以下统称为“公司”）遵守全球范围内适用的反贿赂和反腐败法律法规。
<b>SCOPE</b>	<b>范围</b>
This policy applies globally to all team members, officers and directors of the Company and any third party acting on the Company's behalf.	本政策适用于公司全球范围内的所有团队成员、官员和主管以及任何代表公司行事的第三方。
<b>DEFINITIONS</b>	<b>定义</b>
<i>Anything of value</i> – This term is broadly interpreted under the law. Examples include cash or cash equivalents (e.g. gift cards); gifts or entertainment; promises to pay personal expenses (e.g. medical, educational, living expenses; making sponsorships or donations to a 'pet charity' of a public official; extending employment or unpaid internship to the friend or relative of a key decision-maker; or other courtesies.	<i>任何有价物</i> ——此术语在法律下有广泛的解释。示例包括现金或现金等价物（例如礼品卡）；礼品或招待；承诺支付个人费用（例如医疗、教育、生活费用）；向公职人员的“宠物慈善机构”提供赞助或捐款；为关键决策者的朋友或亲戚提供就业或无薪实习机会；或者其他好处。
<i>Bribery</i> – Offer to give or receive anything of value with the intent to corruptly influence a person's actions or decisions to gain any business or other improper advantage.	<i>贿赂</i> ——通过提供或收受任何有价物来不当影响个人的行动或决定，以便获得任何商业或其他不当优势。
<i>Corruption</i> – Obtain or attempt to obtain a personal benefit or business advantage through improper or illegal means. Corruption includes activities	<i>腐败</i> ——通过不恰当或非法手段获得或试图获得个人利益或商业优势。腐败活动包括贿赂、敲诈和回扣等。
See the Policies & Procedures Library for the Latest Version Print Date: 1/11/2023	请参阅政策和程序资源库以获取最新版本 打印日期: 1/11/2023
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such as bribery, extortion and kickbacks.	
<i>Directly or indirectly</i> – if you are prohibited from making any payment, gift, offer or promise directly, you are also prohibited from making it indirectly. You may not instruct, authorize or allow a third party to make a prohibited payment on your behalf, and you may not make a payment to a third party knowing or having reason to know that it will likely be given improperly.	<i>直接或间接</i> ——如果您被禁止直接进行任何支付、送礼、报价或许诺，则您亦不得间接执行这些活动。您不得指示、授权或允许第三方代表您执行违禁支付，且您不得在明知或应知可能导致不当支付的情况下对第三方进行支付。
<i>Extortion</i> – Obtain money or some other thing of value by the abuse of one’s office or authority.	<i>敲诈</i> ——通过滥用职权来获取金钱或其他有价物。
<i>Kickback</i> – Two parties agree that a portion of sales or profits will be improperly given, rebated or kicked back to the purchaser in exchange for making the deal.	<i>回扣</i> ——为达成交易，双方同意不正当地将销售额或收益的一部分给予、返回或回馈给买方。
<i>Non-U.S. Government Officials</i> – The definition of non-U.S. government officials as used in this policy is meant to be very broad. It includes any officer or employee of any non-U.S. government or government-controlled entity (including any department, division or agency of government), or any state-owned or state-controlled entity, from the local to the national level. Non-U.S. government officials may include, for example:	<i>非美国政府官员</i> - 本政策中对非美国政府官员的定义很宽泛。它包括任何从地方级到国家级、非美国政府或政府控制下的实体（包括任何部门、分部或政府机构）或任何国有或国家控制实体的任何官员或雇员。非美国政府官员的例子包括：
<ul style="list-style-type: none"> <li>Officers and employees of public institutions, such as notary publics, lawyers, teachers and doctors</li> </ul>	<ul style="list-style-type: none"> <li>公共机构的官员和雇员，例如公证人、律师、教师和医生</li> </ul>
<ul style="list-style-type: none"> <li>Companies under government ownership or control, even if the companies are operated like privately owned corporations (e.g., government-controlled joint ventures)</li> </ul>	<ul style="list-style-type: none"> <li>由政府所有或控制的公司，即使这些公司像私营企业一样运作（例如，政府控制下的合资企业）</li> </ul>

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<ul style="list-style-type: none"> <li>Members of royal families</li> </ul>	<ul style="list-style-type: none"> <li>王室成员</li> </ul>
<ul style="list-style-type: none"> <li>An officer or employee of a national or international public organization</li> </ul>	<ul style="list-style-type: none"> <li>国家或国际公共组织的官员或雇员</li> </ul>
<ul style="list-style-type: none"> <li>Part-time workers, unpaid workers, and any person acting in an official capacity (e.g., a celebrity ambassador for UNICEF) on behalf of a government or public international organization (e.g., the United Nations or World Bank)</li> </ul>	<ul style="list-style-type: none"> <li>兼职员工、无薪员工，以及以官方身份（例如，联合国儿童基金会（UNICEF）的名人大使）代表政府或国际公共组织（例如，联合国或世界银行）行事的任何人</li> </ul>
<ul style="list-style-type: none"> <li>An employee of any business that is owned or controlled by the state or government in any way (e.g., state-owned entities, state universities, public schools and hospitals, or state-controlled media)</li> </ul>	<ul style="list-style-type: none"> <li>由国家或政府以任何方式拥有或控制的任何企业的雇员（例如，国有实体、州立大学、公立学校和医院，或国家控制的媒体）</li> </ul>
<ul style="list-style-type: none"> <li>Any political party, official or candidate of a political party, or employee of a political party</li> </ul>	<ul style="list-style-type: none"> <li>任何政党、政党官员或候选人或政党雇员</li> </ul>
<ul style="list-style-type: none"> <li><i>Third Party</i> - Third parties are broadly defined to include any person or entity with which the Company does business including, but not limited to, agents, brokers, consultants, dealers, distributors, representatives, resellers, suppliers, contractors, joint venture partners, and other business partners.</li> </ul>	<ul style="list-style-type: none"> <li><i>第三方</i>——广义上，第三方包括与公司开展业务的任何个人或实体，包括但不限于代理机构、经纪人、顾问、经销商、分销商、代表、转售商、供应商、承包商、合资伙伴和其他业务伙伴。</li> </ul>

POLICY	政策
<p>It is Oshkosh Corporation's policy to use only ethical business practices while conducting business activities. We compete fairly and ethically on the merits of our products and services. Our Company has a zero-tolerance approach towards bribery and</p>	<p>Oshkosh Corporation 的政策是，在开展商业活动时，只能采用符合道德的商业实践。我们凭借产品和服务的优势公平、道德地参与竞争。本公司对任何贿赂和腐败行为采取零容忍态度，并要求所有公司成员、官员和主管以及任何代表公司行事的第三方完全遵守适用的反贿赂和反腐败法律法规。这</p>

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<p>corruption and requires all Company team members, officers and directors and any third party acting on behalf of the Company to comply fully with applicable anti-bribery and anti-corruption laws and regulations. These laws and regulations include the U.S Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA) and anti-bribery laws and regulations of other countries in which the Company does or intends to do business, regardless of local practices, customs or competitive conditions.</p>	<p>些法律法规包括美国《反海外腐败法》(FCPA)、英国《反贿赂法案》(UKBA) 以及公司开展或计划开展业务所在国家的反贿赂法律法规, 不考虑当地做法、惯例或竞争环境。</p>
<p><b>Bribes, Kickbacks and Other Corrupt Payments</b></p>	<p><b>贿款、回扣和其他腐败款项</b></p>
<p>Company Team members are prohibited from directly or indirectly offering, giving, soliciting or receiving improper payments, gifts or inducements of any kind to and received from any person or organization.</p>	<p>严禁公司团队成员直接或间接提供、给予、索取或收受不当支付、礼品, 且严禁对任何个人或组织提供任何类型的劝诱或接受他们的劝诱。</p>
<p><u>Facilitation Payments</u></p>	<p><u>通融费</u></p>
<p>Our Company prohibits facilitation or 'grease' payments as these are bribes and illegal. Facilitation or 'grease' payments are unofficial payments to secure or speed up routine actions, usually by public or non-U.S. government officials. Examples of routine actions are issuing permits, licenses or other official documents; obtaining visas and work orders; providing services such as police protection, obtaining mail, or scheduling inspections; or expediting or releasing goods held in customs. This prohibition applies to team members and third parties acting on the</p>	<p>本公司禁止支付通融费或疏通费, 因为这些均为非法的贿款。通融费或疏通费通常是為了让政府公务人员或非美国政府官员保证或加速某些例行行为而支付的非官方款项。例行行为示例包括签发许可、执照或其他官方文件; 办理签证和工作单; 提供诸如警方保护、获取信函或安排检查等服务; 或加快检查或释放海关扣留的货物。本禁令适用于公司团队成员和代表公司行事第三方。如果您不确定某款项是否会被视为疏通费, 则应仅在官员或第三方能够提供可证明其合法性的正式发票的情况下进行支付。</p>

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<p>Company's behalf. If you are unsure whether a payment would be considered a facilitation payment, only make the payment if the official or third party can provide a formal receipt as written confirmation of its legality.</p>	
<p>A published, well-documented expediting fee paid directly to a government or state-owned agency is not typically considered a facilitating payment under anti-corruption laws. For example, paying a fee to expedite a passport application, deliver a package, or process government paperwork such as visas, is not considered a facilitating payment for purposes of corruption laws, if those fees are payable to an entity – not an individual – and are published openly.</p>	<p>根据反腐败法，直接支付给政府或国有机构的已公布、有据可查的加急费通常不被视为通融费。例如，支付加快护照申请、递送包裹或处理签证等政府文件的费用，如果这些费用是支付给实体（而非个人）且公开发布的，则不被视为腐败法定义的通融费。</p>
<p>If you are making a payment because you are in fear for the health, safety or welfare of yourself or another team member, this is an extortion payment. Make the payment and notify your manager; the Vice President and Chief Ethics, Compliance and Sustainability Officer; and the General Counsel as soon as you are able. Such payments must be accurately accounted for in the Company's books and records.</p>	<p>如果您因担心自己或另一位团队成员的健康、安全或安宁而进行支付，则这属于一次敲诈勒索事件。进行付款并尽快通知您的直属经理、副总裁、首席道德、合规与可持续发展官，以及总法律顾问。此类付款必须在公司的账簿和档案中作出准确记录和说明。</p>
<p><u>Business Gifts, Entertainment and Travel Expenses</u></p>	<p><u>商业礼品、招待和差旅费用</u></p>
<p>Our Company prohibits offering, giving, or receiving gifts and entertainment that are intended to gain a competitive advantage or to influence business decisions. Offering, receiving or providing gifts or entertainment that are excessive or inappropriate can be</p>	<p>本公司禁止提供、给予或接受旨在获得竞争优势或影响业务决策的礼品和招待。许诺、接受或提供过度或不适当的礼品或招待可能会损害我们的公司，损害公司的声誉，并造成实际或印象中的利益冲突。</p>

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damaging to our Company, harm our Company's reputation and create actual or perceived conflicts of interest.	
It is allowable to provide nominal business gifts, entertainment or to provide travel and lodging accommodations as long as these comply with our Company policies, the policies of the intended recipient's organization, gift laws and monetary limits, as applicable.	只要符合公司政策、目标接收方组织的政策、礼品制度和金额限制且理由适当，则允许提供价值较小的商业礼品、招待或提供旅行和住宿。
Special care must be taken when this form of expenditure is provided to non-U.S. government officials. Our Company will not pay for any expenses related to travel or other activities of officials that are not in compliance with applicable laws and regulations including the FCPA and country-specific laws or officials whom we are hosting. The FCPA allows companies to provide reasonable and bona fide travel and expenses to an official where expenses are directly related to the promotion, demonstration, or explanation of a company's products or services, or are related to a company's execution or performance of a contract with a non-U.S. government or agency.	向非美国政府官员提供这种形式的支出时，必须特别注意。本公司不会支付与不符合适用法律法规（包括 FCPA 和特定国家/地区的法律）或我们所接待官员的要求相关的官员差旅或其他活动费用。FCPA 允许公司向官员提供合理、真实的差旅和费用，这些费用与公司产品或服务的促销、演示或解释直接相关，或者与公司执行或履行与非美国政府或机构的合同有关。
Further guidelines for these expenditures are included in the Gifts and Entertainment Policy(GBL-POL-LGL006) and Gifts, Travel and Entertainment Procedure for Non-U.S. Government Officials (GBL-PROC-LGL004).	有关这些支出的进一步指导方针，请参阅《礼品和招待政策》(GBL-POL-LGL006) 和《非美国政府官员礼品、差旅和招待程序》(GBL-PROC-LGL004)。
<u>Charitable Donations and Sponsorships</u>	<u>慈善捐赠和捐助</u>

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Charitable donations and sponsorships must not benefit government officials by conferring a personal benefit on an official or as part of an exchange of favors with the official. Before making a charitable donation, contact the Oshkosh Corporation Foundation or Legal/Global Ethics & Compliance.	慈善捐赠和捐助不得通过给予官员个人利益，或作为与官员交换好处的一部分而使政府官员受益。进行慈善捐赠之前，请联系 Oshkosh Corporation 基金会或法务部/全球道德与合规部。
<u>Political Contributions</u>	<u>政治捐款</u>
The Company encourages team members to play an active role in the communities where they live and work. However, it is important to keep personal political activities separate from our work at Oshkosh. Oshkosh does not make political contributions and will not reimburse team members for contributions they make. No political contribution shall be made, directly or indirectly, with corporate funds or assets regardless of whether the contributions are legal under the laws of the country in which they are made. The only authorized contributions are voluntary contributions through the Oshkosh Corporate Employee Political Action Committee (OCEPAC).	公司鼓励团队成员在其生活和工作所在的社区发挥积极作用。然而，请务必将个人政治活动与在 Oshkosh 的工作区分开来。Oshkosh 不提供政治捐款，也不会报销团队成员的政治捐款费用。不得使用公司资金或资产直接或间接进行政治捐款，无论捐款根据其所在国家/地区的法律是否合法。唯一授权的捐款是通过 Oshkosh 公司员工政治行动委员会 (OCEPAC) 自愿捐款。
<b>Third Parties</b>	<b>第三方</b>
This policy prohibits corrupt offers, promises or payments made through third parties acting on behalf of the Company. It is important that our Company only works with third parties that are legitimate and have a reputation for integrity. Team members have an obligation to carefully select every third party that acts on the Company's behalf and to ensure that	本政策严禁通过代表公司行事的第三方进行腐败性的提供好处、许诺或付款。重要的是，本公司只与合法且有诚信声誉的第三方合作。团队成员有义务谨慎选择代表公司行事的每一个第三方，并确保根据公司的要求对其执行相应的尽职调查。团队成员应向其事业部总法律顾问或全球道德与合规团队报告任何第三方的不道德或可能行贿的迹象。

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proper due diligence is performed as required by Company procedures. Team members are expected to report any signs that a third party is unethical or could be paying a bribe to their Segment General Counsel or the Global Ethics & Compliance team.

When working with agents, intermediaries or engaging in other strategic partnerships, our Company employs a robust risk-based due diligence process designed to identify and appropriately mitigate risks related to these entities. The due diligence procedures include verifying the identity of the third party and understanding ultimate beneficial ownership. These entities are required to certify and agree to compliance with anti-corruption laws, and agreements include anti-corruption clauses, termination rights and, where appropriate, audit rights. In the case of a joint venture, the entity is also required to establish necessary policies, procedures, and roles and responsibilities to ensure an effective compliance program.

All payments to third parties involved in business transactions must be proper, legal and reasonable in nature and value relative to the goods or services being provided by the third parties. Payments made to third parties for non-U.S. sales transactions and transactions with non-U.S government officials are considered "higher risk" and must follow the Third Party Payments for Non-U.S. Sales Transactions procedure (GBL-PROC-LGL003) In addition, contracts with third parties should, to the extent

在与代理机构、中介机构合作或参与其他战略合作伙伴关系时，本公司采用基于风险的稳健尽职调查流程，旨在识别并适当降低与这些实体相关的风险。尽职调查程序包括核实第三方的身份和了解最终受益所有权。这些实体需要证明并同意遵守反腐败法，并且协议包括反腐败条款、终止权以及审计权（如适当）。在合资企业中，实体还需要制定必要的政策、程序以及角色和职责，以保障有效的合规计划。

业务交易中向第三方支付的所有款项在性质和价值上必须适当、合法且合理，并且与第三方提供的商品或服务相关。为非美国销售交易以及与非美国政府官员的交易向第三方支付支付的款项被视为具有“较高风险”，必须遵循非美国销售交易的第三方付款程序（GBL-PROC-LGL003）此外，与第三方签订的合同应尽量包括缓解潜在违法付款风险的条款。



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possible, include provisions to mitigate against the risk of potential illicit payments.	
Further guidance around due diligence procedures for third parties involved in non-U.S. sales transactions is provided in the Investigating Third Party Intermediaries procedure (GBL-PROC-LGL014).	要进一步了解非美国销售交易中涉及的第三方的尽职调查程序指南, 请参见《调查第三方中介程序》(GBL-PROC-LGL014)。
<b>Record-Keeping</b>	<b>记录</b>
The failure to maintain adequate books and financial records violates many countries' laws, including the U.S. FCPA, even where no bribery takes place. Every team member must comply with our internal controls, financial reporting, and document retention procedures to ensure that the Company can demonstrate its compliance with anti-bribery laws and regulations.	即使没有进行任何贿赂, 如未维护适当的账簿和财务记录, 也将违反很多国家的法律, 包括美国 FCPA。每位公司成员均必须遵守内部控制、财务报告和文档保留程序, 以确保公司能够证明对反贿赂法律法规的合规性。
<b>Penalties, Fines and Other Sanctions</b>	<b>处罚、罚款和其他制裁措施</b>
Failure to comply with anti-bribery laws could lead to criminal and civil penalties for the Company and for Company team members personally. Even the appearance of misconduct can result in serious reputational damage to the Company. The Company can be barred from doing business with the Federal government if found guilty of misconduct.	如未能遵守反贿赂法律, 可能招致对团队成员或公司的刑事和民事处罚。即使是不当行为表象也可能严重损害公司声誉。如发现有任何不当行为, 则公司可能会被禁止与联邦政府开展业务。
<b>REFERENCES</b>	<b>参考资料</b>
<a href="#">The Oshkosh Way—Our Code of Ethics and Conduct</a>	<a href="#">The Oshkosh Way - 我们的《道德与行为准则》</a>

GLOBAL POLICY			
Title:	Anti-Bribery / Anti-Corruption Compliance		
Number:	GBL-POL-LGL005-CHI	Last Revised:	4/8/2022

全球政策			
标题:	反贿赂/反腐败合规		
编号:	GBL-POL-LGL005-CHI	上次修订日期:	4/8/2022

<a href="#">GBL-POL-LGL006 - Gifts and Entertainment</a>	<a href="#">GBL-POL-LGL006 - 礼品和招待</a>																																																
<a href="#">GBL-PROC-LGL004 – Gifts, Travel and Entertainment for Non-U.S. Government Officials</a>	<a href="#">GBL-PROC-LGL004 - 非美国政府官员的礼品、差旅和招待</a>																																																
<a href="#">GBL-PROC-LGL003 - Third Party Payments for Non-U.S. Sales Transactions</a>	<a href="#">GBL-PROC-LGL003 - 非美国销售交易的第三方付款</a>																																																
<a href="#">GBL-PROC-LGL014 - Investigating Third Party Intermediaries</a>	<a href="#">GBL-PROC-LGL014 - 调查第三方中介</a>																																																
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<b>LAST REVIEWED</b>	<b>上次审核日期</b>
Last Reviewed Date: <b>4/8/2022</b>	上次审核日期: <b>4/8/2022</b>
<input type="checkbox"/> New Policy	<input type="checkbox"/> 新政策
<input checked="" type="checkbox"/> Complete Rewrite	<input checked="" type="checkbox"/> 完整重写
If applicable, reference previous number <b>CLICK OR TAP HERE TO ENTER TEXT.</b>	如适用, 请参考之前的编号单击或点击此处以输入文本。
<input type="checkbox"/> Content Changes (include description of change in Revision section above)	<input type="checkbox"/> 内容变更 (包括上述“修订”部分的变更说明)
<b>A new revision number is not applicable if the only changes made are in the list below:</b>	<b>如果仅对下列某项进行了变更, 则不适于采用新版本号:</b>
<input type="checkbox"/> No Changes Made	<input type="checkbox"/> 无变更
<input type="checkbox"/> Formatting	<input type="checkbox"/> 格式
<input type="checkbox"/> Grammar	<input type="checkbox"/> 语法
<input type="checkbox"/> Contacts	<input type="checkbox"/> 联系人
<input type="checkbox"/> Responsible Party	<input type="checkbox"/> 责任方
<input type="checkbox"/> Approver	<input type="checkbox"/> 批准人
<input type="checkbox"/> Number Changed, Previous Number Was: <b>CLICK OR TAP HERE TO ENTER TEXT.</b>	<input type="checkbox"/> 编号变更, 之前的编号为: 单击或点击此处以输入文本。