

The Oshkosh Way

Supplier Code of
Ethics and Conduct



OSHKOSH™



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A message from our President and Chief Executive Officer

Doing the right thing is critically important to us and is one of the core values we live every day. Our values are: we put people first, we do the right thing, we persevere, we are better together.

These core values are the foundation of our People First culture and demonstrate how we live our purpose of making a difference in people's lives. Our team members, customers, shareholders and communities count on us every day to do business the right way.

The Oshkosh Way, our Code of Ethics and Conduct, is based on our core values. It's a roadmap of expectations and policies that guide each one of us. It's how we act on behalf of our Company. It's how we ensure we operate our business in accordance with the highest ethical standards.

We encourage you to use the Oshkosh Way as your guide and be an active participant in upholding the values that truly exemplify our People First culture.

John C. Pfeifer
President and Chief Executive Officer



Who we are and what we value

At Oshkosh, we believe in advancing the world around us. In building, serving and protecting people and communities. We are united by a common purpose: to make a difference in people's lives. Our values are the belief system that helps us ensure our behaviors are aligned with our purpose and drive us to do great work for great people.

Our values

WE PUT PEOPLE FIRST

- We treat people how they need to be treated.
- We keep people safe, within our walls and those using our products.
- We care for the emotional, physical and financial wellbeing of our people.
- We celebrate what makes each of us unique.
- We value other's words and ideas.
- We respect the impact we have on each other, on the people we serve and in communities around the world.

WE DO THE RIGHT THING

- We do the right thing, the right way, for the right reasons.
- We take responsibility for our actions.
- We speak up and share our thoughts and concerns.
- We keep our promises.
- We respect our environment: both where we work and the planet we rely on.

WE PERSEVERE

- We push the bounds of technology and engineering to bring value to our customers and those who count on us.
- We challenge the impossible to make a difference every day.
- We are courageous and steadfast.
- We strive to overcome obstacles and achieve our goals.

WE ARE BETTER TOGETHER

- We welcome ideas different from our own.
- We rely on diversity to drive innovation.
- We create an inclusive, empowering environment for all.
- We work together across geographies, platforms, business units and functions to help our company reach its fullest potential.



We live the Oshkosh Way

[A shared commitment](#)

[Monitoring](#) / [Seeking help](#) / [Speaking up](#)





A shared commitment

What it means to live the Oshkosh Way

We believe in the importance of building incredible products ... in working for more than just work ... in making a difference in lives and communities across the world.

We recognize that doing work the right way—the Oshkosh Way—means living our values every day.

We are all responsible

Oshkosh Corporation directors, officers, team members, contractors, interns, consultants, and agents of Oshkosh Corporation (“Oshkosh”) and all our segments, subsidiaries and affiliates around the world are required to read and follow the [Oshkosh Corporation Code of Ethics and Conduct](#).

Similarly, we expect all suppliers, vendors, and other third-party business partners to uphold these same high standards as outlined in this Supplier Code of Ethics and Conduct (“Supplier Code”).

Trust and reputation can be lost with one bad decision

We never lose sight of the fact that trust—built up over more than a century—can be lost with one bad decision. That’s why anyone who violates our Code, our policies or the law, may face corrective action, up to and including termination of business with Oshkosh.



Monitoring / Seeking help / Speaking up

We ensure our business partners uphold The Oshkosh Way

Our Global Procurement and Supply Chain team supports suppliers and ensures they understand and are upholding the behavior expectations outlined in the Supplier Code. This includes but is not limited to monitoring activities, on-site inspection (announced or unannounced) of facilities, reviews of books and records by either Oshkosh team members or third parties chosen by Oshkosh.

If we become aware of a situation where a supplier is not adhering to the expectations set forth in the Supplier Code, we will partner with the supplier to correct the issue in a reasonable time frame. If the supplier is unable to correct the issue or refuses to uphold the Supplier Code, we reserve the right to terminate the business relationship.

Seek help and share concerns

Doing the right thing means being proactive. We encourage our suppliers to reach out to us if they have an ethical or legal concern related to the Supplier Code or related to their business relationship with Oshkosh.

Suppliers are also expected to offer avenues for their team members to raise ethical issues or concerns.

The Ethics Helpline

Suppliers can raise concerns to the Oshkosh Global Procurement and Supply Chain team or by using the Ethics Helpline. Accessible by phone or web, the [Ethics Helpline](#) allows anyone to ask questions or share their concerns 24 hours a day, seven days a week. Translators are available, and anyone who contacts the Helpline may do so anonymously. Information provided through the Helpline is documented in detail and forwarded to the Global Ethics & Compliance Team for investigation and resolution.

No retaliation

Oshkosh wants people to feel comfortable coming forward, knowing they are doing the right thing. Our company strictly prohibits retaliation against anyone who makes a good faith report or assists in an investigation of a possible issue. We also expect our suppliers to prohibit all forms of retaliation.

Ethics Helpline Contact Information

www.tnwinc.com/reportline/Oshkosh



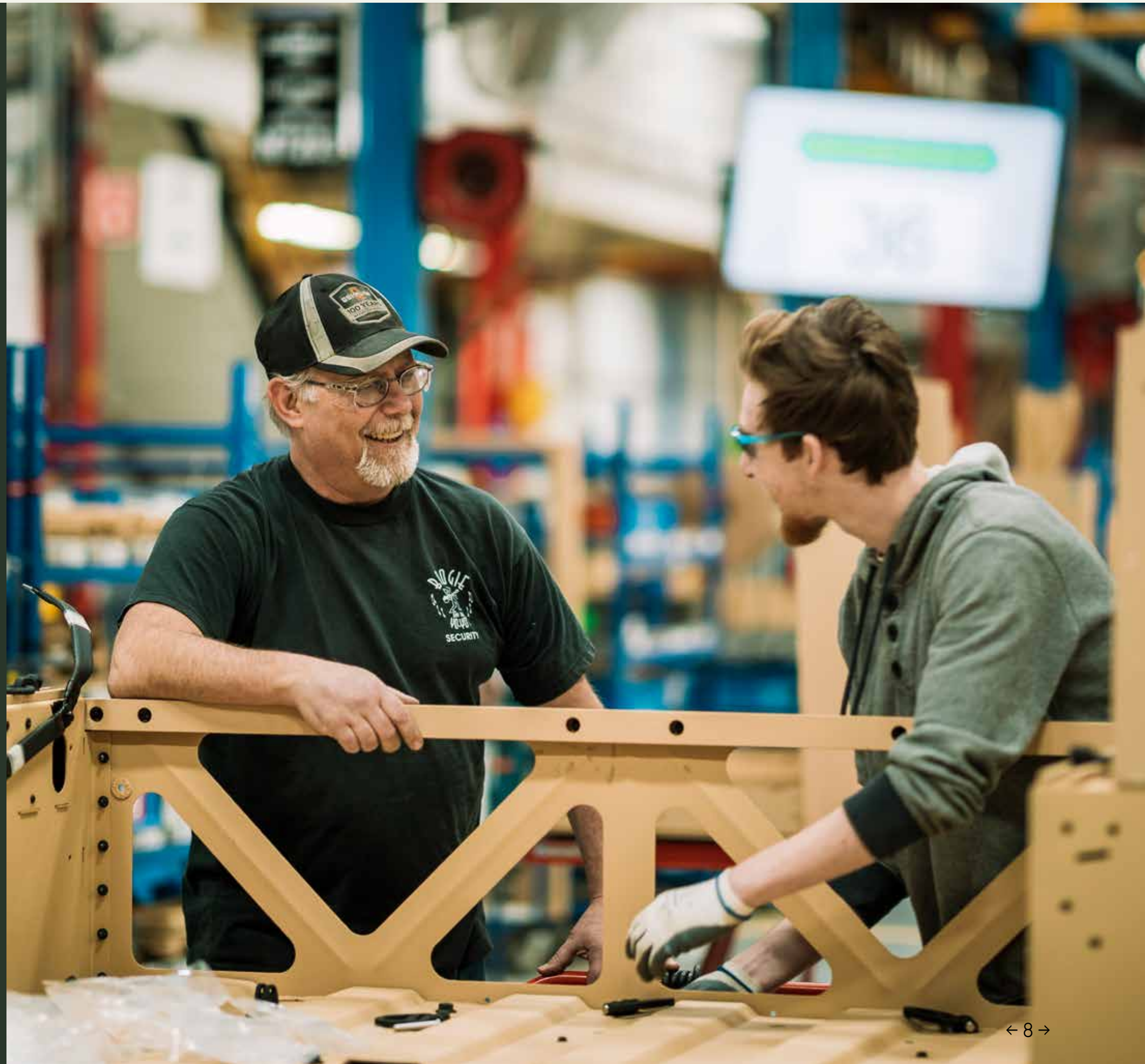


We put people first

[Diversity, anti-discrimination, and a harassment-free workplace](#)

[Human rights](#)

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Diversity, anti-discrimination, and a harassment-free workplace

Behind every product we build is a passionate network of people with a diversity of ideas, experiences, backgrounds, and perspectives. We celebrate these differences knowing they make us better.

We promote a positive, people first workplace where every individual is treated with dignity, and harassment is never okay. Our suppliers are expected to provide this same positive work environment for their team members.

Our suppliers are expected to prohibit discrimination against individuals based on their sex, race, color, age, religion, disability, national origin, veteran status, sexual orientation, gender identity/reassignment/expression, familial status, citizenship, genetic information, pregnancy, or other protected categories and abide by the employment laws of the location where we operate.



WHAT IS “HARASSMENT”?

It’s unwelcomed conduct toward another person that creates an intimidating, hostile or offensive work environment. It includes things like physical or verbal intimidation, inappropriate jokes, racial slurs, name-calling, unwelcome touching or sexual advances and the posting or sharing of obscene images.



Human rights

Our people first commitment means we respect and protect human rights and promote fair employment practices everywhere we do business. We recognize our obligation to uphold human rights for all and ensure these rights are respected throughout our supplier network. Our suppliers must also uphold these obligations and apply these standards when selecting their suppliers.

All suppliers must prohibit any form of modern slavery including child labor, forced labor, and human trafficking. This includes ensuring all products are free from conflict minerals (3TG) where the income is used to support armed groups or criminals that prey on vulnerable people and perpetuate human rights abuses. They are also expected to protect the rights of all people to earn a fair wage, work in safe and healthy conditions, and exercise their legal rights of free association and collective bargaining.

Together we share a commitment to advance the human rights of all people. With this shared commitment, Oshkosh may decide to issue an inquiry into your human rights program and supply chain. It is your obligation to respond to this inquiry not only timely, but as complete and accurate as possible.



What to look for

Look for—and speak up about—human rights red flags, including:

Employees, who:

- Appear unusually young
- Look fearful or nervous
- Show signs of poor health or hygiene
- Are not free to leave at will

A work environment that:

- Has unusual security—like bars on the windows or barbed wire fencing
- Lacks proper safety equipment



Health, safety and security

We are passionate about safety and keeping everyone in our workplace injury-free. Our suppliers are expected to share that commitment to ensuring a safe workplace that complies with all health and safety laws and regulations including international safety standards.

We also expect our suppliers to create a workplace that is free of threats and violence. This includes having clear physical security, policies and procedures, and educating team members on their responsibilities to report any strange or suspicious activity.





We do the right thing

[Conflicts of interest and gifts and
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Conflicts of interest

Our suppliers should avoid all conflicts of interest or even the appearance of a conflict in all business dealings with Oshkosh Corporation. Any activity, interest or relationship that affects the ability to make fair, objective decisions for Oshkosh could pose a conflict of interest. Even the perception of a conflict can erode trust.

It's not always easy to spot conflicts of interest, but there are certain situations between a supplier and Oshkosh where they typically arise including relatives and friends, personal or family financial interests, corporate opportunities, and gifts and entertainment. Knowing and avoiding these situations is the best way to avoid a conflict.

Sometimes, even if we're careful, conflicts can happen. In those cases, suppliers should disclose any potential conflict--or the appearance of one--to Oshkosh Corporation immediately, so that we can work together to address it, manage it or steer clear of it.

Gifts and Entertainment

Gifts, entertainment, hospitality and favors can pose a conflict of interest, if they affect our objectivity or give others the impression they do. We want to avoid the appearance of anything improper. We expect our suppliers to make sure anything given or received is nominal in value and supports a legitimate business purpose.





Anti-bribery and anti-corruption

We make it very clear that we win business based on the quality of our products and the passion of our people. We do not buy business, and we do not partner with companies who do. All suppliers should foster a strong values-based culture, have clear policies that prohibit any form of bribery or corruption, and educate their team members on the behavior expectations.

Our suppliers are expected to do business the right way and never win business through bribes. This includes avoiding all facilitation payments intended to expedite or secure routine governmental actions like obtaining a visa or customs clearance.

All suppliers must comply with the U.S. Foreign Corrupt Practices Act as well as other applicable anti-corruption laws and regulations in the countries where they do business.

A BRIBE CAN TAKE THE FORM OF ...

Cash or cash equivalents—like gift cards, checks, loans and stock options

A business opportunity or job offer including internships

Gifts, meals, travel or entertainment that don’t meet our [guidelines](#)

A favor

Charitable or political donations

Preferential treatment on a bid or favorable terms in a contract



Fair competition

Competition allows for innovation, product options, and competitive pricing for customers. This is why countries around the world have enacted laws (usually referred to as “antitrust” or “competition” laws) that prohibit anticompetitive behavior.

All suppliers are expected to follow these laws and avoid any attempt to restrict full and fair competition including market allocation, price fixing, bid rigging, and illegal boycotting.

In addition, we expect our suppliers to gather competitive intelligence the right way through public available sources. Deception and dishonesty should never be used to obtain competitive information.





We persevere

[Product quality and safety](#)

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Product quality and safety

We have more than 100 years invested in delivering safe, high-quality products. Our customers trust that our products and technologies will not only represent the industry's very best, but also be designed with their safety in mind. Every day we work to maintain their trust.

To do this, we expect both our internal and external business partners, including suppliers, to follow strict processes and procedures. This enables us to meet or exceed our own internal standards, as well as the requirements set by laws, government regulations and industry standards. We are also constantly looking for ways to innovate without sacrificing quality or safety, and we expect our suppliers to do the same. Our brand is our promise—we want any product that bears the Oshkosh name to be reliable and stand for exceptional performance and safe operation.





Government business

We are honored to serve national, regional and local governments. We recognize supporting our government customers means we are making a difference in the lives of the people and communities **they** support.

Being a government contractor is a privilege as well as a big responsibility. We earn that privilege every day by making sure we know and follow all of the complex requirements that apply to this work. We also take extra care in protecting all our government customers' information. With this, we expect our suppliers to take action to protect our information and requirements and to comply to procurement compliance policies and regulations.



Procurement Compliance Resources

It is important to follow the procurement policies, processes, regulations and laws of the countries where we operate. In the United States, that includes:

- The Federal Acquisition Regulation (FAR)
- The Defense Federal Acquisition Regulation Supplement (DFARS)
- The Truthful Cost or Pricing Data Act, formerly known as the Truth in Negotiations Act (TINA)



Global business

Oshkosh relies on its ability to ship products all over the world. It is a privilege we don't take for granted. We make sure we follow the rules to preserve our ability to conduct business across borders, and we expect our suppliers to do the same.

Suppliers have a responsibility to understand and comply with all trade laws, regulations, and restrictions in the countries where they operate. These can include but are not limited to, licensing, reexport authorizations, restricted party screening, sanctions/boycotts, technical data controls, prohibited chemicals/substances, and emissions.



ALWAYS AVOID ...

Sending emails to a foreign partner with technical requirements or drawings

Carrying commercial goods in your luggage while traveling

Selling or subcontracting in a sanctioned country



We are better together

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Confidential information

Innovation moves the world forward and is essential to the ability to design and build products that challenge today's limits. Oshkosh is committed to protecting our confidential information and the confidential information entrusted to us by our partners and customers.

Suppliers are expected to honor that responsibility as well by protecting the intellectual property of Oshkosh and any third parties. This includes getting necessary authorizations and licensing agreements, and properly using trademarks, copyrights, logos, and designs. We expect all proprietary information to be protected from unauthorized use, distribution, alternation, or deletion. All confidential and proprietary information should be classified and marked properly, and shared only with those who are authorized and have a business need to know it.



WHAT IS “INTELLECTUAL PROPERTY”?

It's the collection of creative thoughts, ideas and processes behind products. It includes patents, technical data, copyrights, trademarks and trade secrets. Always get the necessary authorizations and licensing agreements, and properly use trademarks, copyrights, logos and designs.



Accurate records

Accurate recordkeeping is everyone's responsibility. Financial integrity is critical to business success and maintaining the trust of all stakeholders.

Suppliers are expected to create, protect, and dispose of business records as required by all applicable laws and regulatory requirements. Accounting records must be accurate, complete, and fairly reflect all transactions, assets, liabilities, revenues, and expenses.





Sustainability and the environment

We believe sustainability is a mindset, a way of thinking about our planet and our impact on it in every action we take. We promote environmental accountability and stewardship, and we expect the same from our suppliers. This includes following all environmental laws, policies, and procedures that apply to their business.

Sustainability is a shared responsibility. Together we can make our communities safer and healthier.

3 ACTIONS OUR BUSINESS PARTNERS CAN TAKE

- 1. Take responsibility for helping to reduce waste and emissions**
- 2. Look for opportunities to conserve energy in your facilities**
- 3. Safely dispose of all waste products, reusing and recycling whenever possible**



A portfolio of leading brands.
One unified business.

