



# The Oshkosh Way

Our 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](#)

[Our responsibilities](#)

[Seeking help / Speaking up](#)





# A shared commitment

## We know 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 our critical work the right way—the Oshkosh Way—allows us to honor our ethical heritage and continue to make a difference in the lives of our team members, customers, shareholders and communities.

## Our Code of Ethics and Conduct (“Code”) shows us how

Everything we do at Oshkosh is designed with people in mind ... including this Code.

It’s our guide for making the right decisions and doing business the right way. It brings our purpose, values and our People First culture into focus and helps us navigate our way through everyday ethical situations. It also points us to people, policies and resources for answers to questions and help with concerns.

**“NO ONE SETS OUT TO DO THE WRONG THING. IT USUALLY HAPPENS SLOWLY, TACITLY AND WITHOUT COMPLETE MINDFULNESS. BY UNDERSTANDING AND LIVING THE OSHKOSH WAY WE EMPOWER OURSELVES AND OUR DAILY DECISIONS TO ALIGN WITH THE RIGHT DIRECTION.”**

- A team member in Riyadh, Saudi Arabia

## We are all responsible

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 our Code.

We also expect our suppliers, vendors and other third-party business partners to uphold the same high standards as we do and to follow the spirit of our 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 employment at Oshkosh.



# Our responsibilities

## We make a commitment

We all have a responsibility to live and work the Oshkosh Way. Everyone at every level of Oshkosh is expected to:

- **Model and apply our core values.** We use our values as our guide every day. We follow our Code, our policies and the laws of the countries where we operate, and we help others to do the same. If we have questions or are unsure what to do, we ask for help from our leader, Human Resources or the Global Ethics & Compliance Team.
- **Speak up.** We know it takes courage to speak up. If we see or suspect that someone is not living our values, we say something. We also cooperate fully and honestly with any investigations into misconduct. Coming forward is not always easy, but it's always the right thing to do.
- **Never compromise on integrity.** We make sure there's no difference between what we say and what we do. We don't let the pressure to succeed make us do things we know are wrong. If we can't do business legally and ethically, we walk away.

## We expect even more from those who lead team members

Leaders have additional responsibilities and set the tone for how business gets done. Those of us who lead others are expected to:

- **Foster a strong ethical culture.** That means providing clear guidance on what doing the right thing looks like and how to support our core values every day.
- **Open our doors.** Create the kind of environment where team members feel comfortable coming to us with questions or concerns. We listen carefully to their concerns and guide them through issues, using the Code as a resource.
- **Take action.** We work to resolve issues quickly. We immediately report any behavior that violates our Code, our policies or the law. If we are not sure when and where to escalate issues, we ask for help from our leader, Human Resources or the Global Ethics & Compliance Team. We never retaliate—or allow others to retaliate—against anyone who shares a concern in good faith.

### WHAT IS “GOOD FAITH”?

Sharing a concern in good faith means there is an honest belief that there is a violation of our Code, our policies or the law.





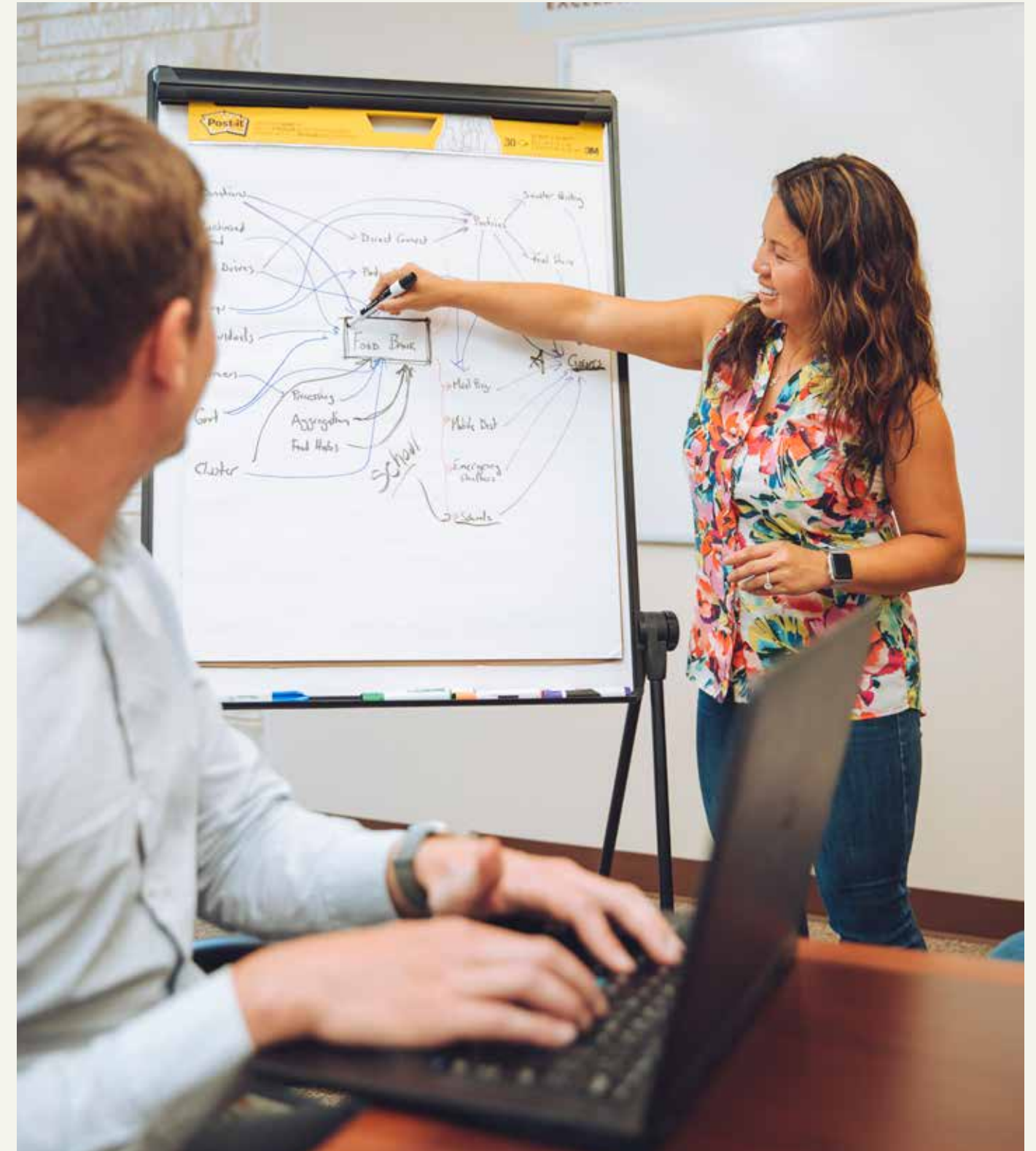
## OUR RESPONSIBILITIES

### We make decisions the right way

We make decisions that are consistent with our values ... but sometimes the right way forward is not obvious. In those situations it can be helpful to ask ourselves:

1. Is it legal?
2. Is it permitted by our Code and our policies?
3. Does it reflect our core values and People First culture?
4. Would we feel good about it if it was reported by the media?

If the answer to all questions is **“yes,”** we know it’s probably OK to proceed. But if the answer to any question is **“no”** or **“I’m not sure,”** we stop and seek guidance from our Code, our leader, Human Resources or the Global Ethics & Compliance Team. See the [helpful resources](#) page for contact information.







# Seeking help / Speaking up

## **We ask questions. We share our concerns.**

Doing the right thing means being proactive. There are a variety of resources available to us if we have questions or want to raise a concern about something that seems wrong. By sharing issues, we can work together to find solutions that will make Oshkosh even better. We can reach out to:

- Our leader or another leader
- [Human Resources](#)
- [The Global Ethics & Compliance Team](#)
- [The Ethics Helpline](#)

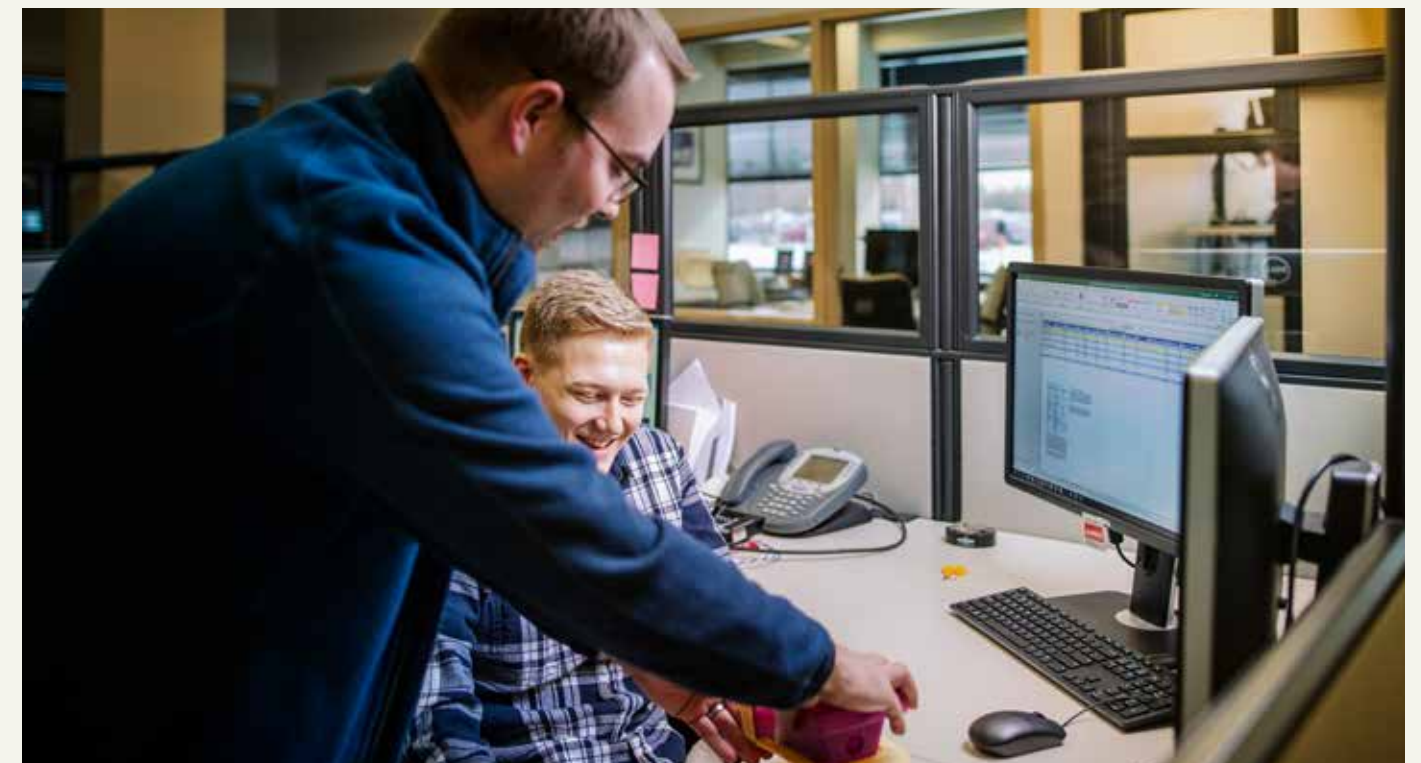
No matter who they are directed to—all questions will be promptly responded to and concerns promptly addressed and investigated.

## **The Ethics Helpline**

Accessible by phone or web, the [Ethics Helpline](#) allows team members and others 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.



### **Learn more**

[Non-Retaliation Policy](#)





# We put people first

[Diversity and anti-discrimination](#)

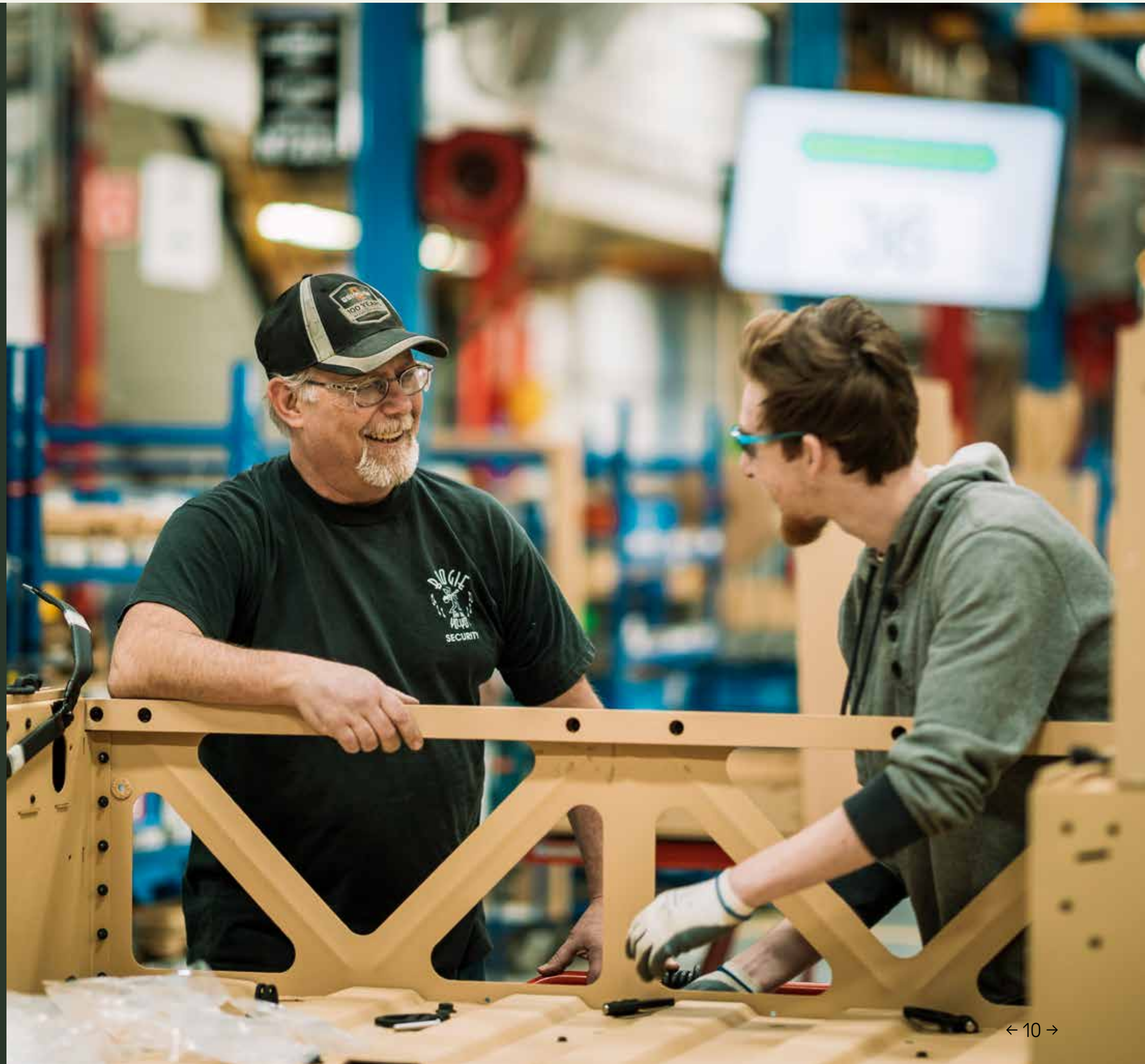
[A harassment-free workplace](#)

[Human rights](#)

[Data privacy](#)

[Health, safety and security](#)

[Charitable activities and contributions](#)







# Diversity and anti-discrimination

Behind every product we build is a passionate network of team members with a diversity of ideas, experiences, backgrounds and perspectives. These differences don't divide us—they make us stronger. Better at problem-solving. Better at innovating. Better at meeting the needs of our diverse customer base.

Together, we celebrate our diversity, value the contributions of every individual and promote a culture of inclusion.

We also celebrate achievement and believe everyone at Oshkosh should have an equal chance to succeed. We 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 or pregnancy and abide by the employment laws of the locations where we operate.

**WHAT IF I SUSPECTED A COWORKER WAS REMOVED FROM A HIGH-PROFILE PROJECT BECAUSE SHE WAS GOING TO HAVE A BABY?**

**REACH OUT TO HUMAN RESOURCES OR THE GLOBAL ETHICS & COMPLIANCE TEAM TO RAISE YOUR CONCERN.**



## The Oshkosh Way in action Frequent Meaningful Conversations

Leaders at Oshkosh play a critical role in caring for our team members and fostering an inclusive environment where people can grow, develop and reach their potential. Our leaders do that by listening, keeping an open mind and having frequent meaningful conversations with their team members.





## DIVERSITY AND ANTI-DISCRIMINATION

### 3 WAYS WE PROMOTE AN INCLUSIVE ENVIRONMENT

# 1.

**Treat team members, business partners and customers with respect**

# 2.

**Listen and be open to different points of view**

# 3.

**Build trust through honest feedback and frequent collaboration**



**Learn more**

[Equal Employment Opportunity & Affirmative Action Policy](#)





# A harassment-free workplace

We promote a positive, people first workplace where every individual is treated with dignity, and harassment is never OK. Regardless of the form it takes or whether we experience harassment personally or see it directed at someone else, we say “not here.”

Speaking up preserves a respectful workplace, the kind of workplace where people can collaborate, contribute and thrive. If we see or suspect harassment, we take action and share our concerns, knowing that Oshkosh prohibits any form of retaliation against anyone who comes forward in good faith.

## WHAT IS “HARASSMENT”?

It’s unwelcome 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.





A HARASSMENT-FREE WORKPLACE

HARASSMENT CAN ...

Take the form of abusive conduct or bullying

Be physical, visual or verbal

Happen in emails, texts or on social media

Be sexual in nature and directed at the same or opposite sex

Happen anywhere

Be inflicted by—or directed at—team members, customers or business partners

We are all accountable for promoting a harassment-free Oshkosh.

**WHAT IF I HEARD A TEAM MEMBER TELLING AN INAPPROPRIATE JOKE?**  
**SPEAK UP AND LET THEM KNOW THAT TYPE OF JOKE IS NOT WELCOME HERE. IF SOMETHING THAT’S SAID MIGHT OFFEND OR HURT SOMEONE—WE DON’T SAY IT.**



**Learn more**

[Harassment Prevention & Reporting Policy](#)

[Non-Retaliation Policy](#)





# Human rights

Our people first commitment extends to every location. And it means we respect and protect human rights and promote fair employment practices everywhere we do business. We believe every individual is free to choose whether or not to work—we prohibit child labor, forced labor, slavery and human trafficking.

We also believe every individual has the right to a fair wage, safe and healthy working conditions and the freedom to exercise their legal rights of free association and collective bargaining.

We expect nothing less from our suppliers and business partners. We strive to work only with those who share our commitment to advance the human rights of all people. We look to those in our supply chain to source responsibly, too, by performing due diligence in selecting **their** suppliers.

**WHAT IF, DURING A VISIT TO ONE OF OUR SUPPLIERS, I NOTICED SOME OF THE EMPLOYEES LOOKED VERY YOUNG AND APPEARED TO WORK REALLY LONG HOURS?**

**REPORT THE SUSPICIOUS ACTIVITY TO OUR GLOBAL ETHICS & COMPLIANCE TEAM RIGHT AWAY.**



## The Oshkosh Way in action

### What to look for

We 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

### Learn more

[Supplier Code of Conduct](#)

[Human Rights Policy](#)

[Conflict Minerals Policy](#)

[Human Trafficking Compliance Plan](#)



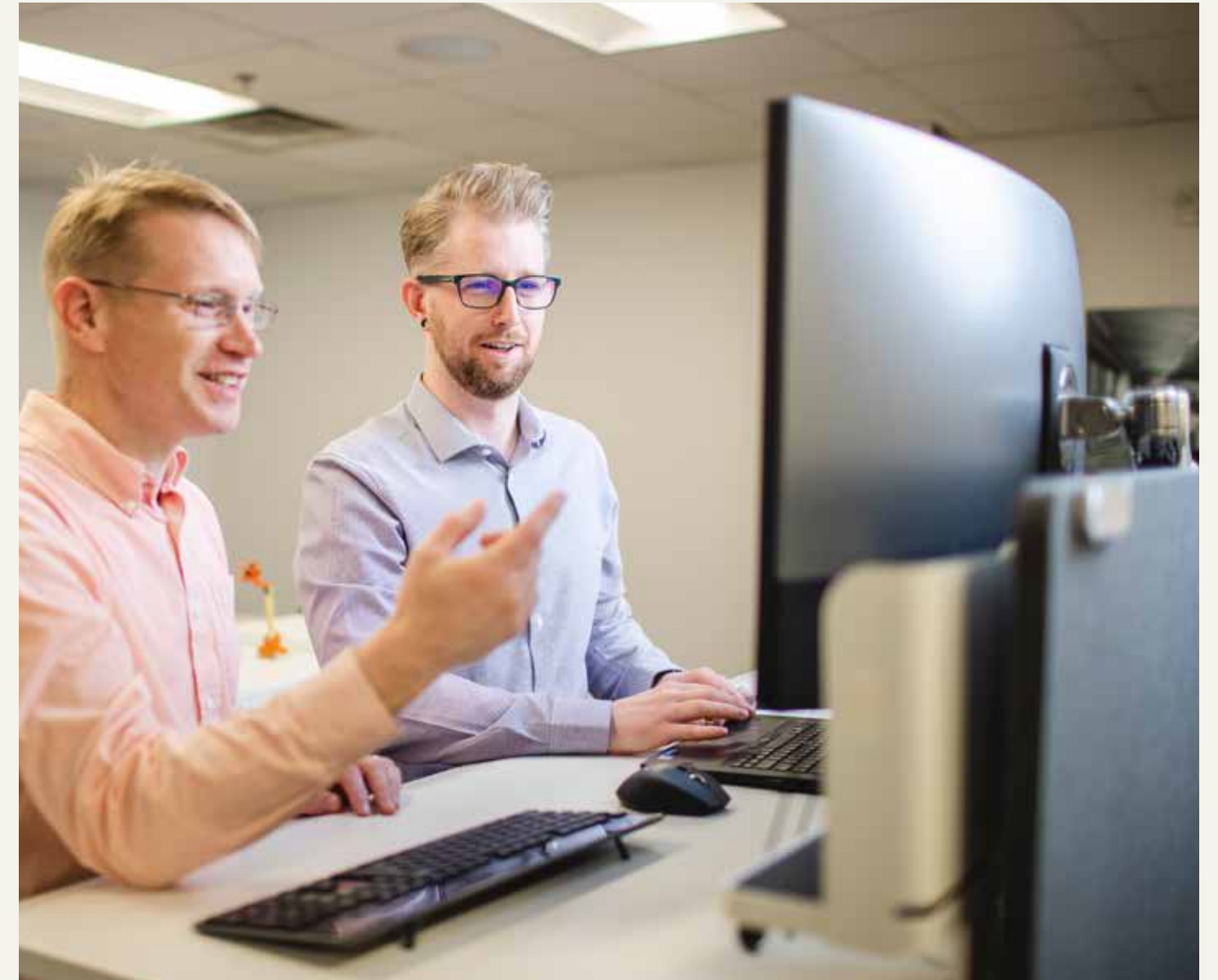
# Data privacy

Anyone who has been a victim of a data breach can attest: privacy matters. That’s why we respect the privacy of team members, customers and business partners and take care to keep their personal information safe.

Our global digital environment is changing rapidly with many countries and localities enacting new privacy regulations. We will comply with all data privacy laws where we operate to responsibly collect, store, use, share, transfer and dispose of personal information. Personal information is confidential information, and we exercise the same high standard of care to protect it. We use it only for legitimate business purposes, collect only what’s needed to get the job done and share it only with people—inside or outside of Oshkosh—who are authorized to see it.

**WHAT IF** SOMEONE LEFT A LIST OF TEAM MEMBERS’ NAMES AND DATES OF BIRTH ON THE COPIER?

**IMMEDIATELY TAKE IT TO HUMAN RESOURCES.**



## WHAT IS “PERSONAL DATA”?

It’s any information that could be used to identify someone, either directly or indirectly.





DATA PRIVACY

EXAMPLES OF PERSONAL INFORMATION INCLUDE ...

A person’s name	An address, email or IP address	A phone number
Bank or credit card information	Health or benefits information	Pay or performance information

If we believe there has been a data breach or disclosure that violates our policies or the law, we speak up immediately. This is the right thing to do and necessary to make sure we meet any legal obligation to report the breach to authorities in a timely fashion.



Learn more

- Classification & Handling of Confidential & Privileged Information Policy
- Acceptable Use Policy
- Personal Identification Information (PII) Policy
- Data Privacy Policy



# Health, safety and security

We are passionate about safety and keeping everyone in our workplace injury-free. We all have individual responsibilities, but ensuring a safe workplace is a responsibility we all share. So we comply with all applicable health and safety laws, policies and regulations, and we complete all required education. We also make sure anyone who visits our facilities knows and complies with our safety requirements.

Of course, a safe workplace is one that is not only injury-free, but also free of threats, violence and weapons, which are prohibited on company property. We keep our facilities safe and secure by complying with our physical security policies and procedures. We stay alert to what's going on around us and promptly report any strangers or suspicious activity.

## **WHAT IF** I SAW A CONVEYOR ON MY LINE WASN'T WORKING PROPERLY?

**NOTIFY THE MAINTENANCE TEAM, EVEN IF IT SEEMS LIKE AN EASY FIX, IF YOU HAVE NOT BEEN PROPERLY TRAINED TO MAKE THAT REPAIR.**



## The Oshkosh Way in action Caring for each other

Wellbeing and caring for each other is an important part of our People First culture. We offer team members opportunities to participate in programs and activities designed to help achieve whole-self wellbeing whether that be financial, emotional or physical goals.

We also provide a robust Employee Assistance Program (EAP) that helps team members and their families with emotional wellbeing. This can be a critical resource at all times, but particularly when facing difficult times. We pay attention and, when we notice signs that a team member may need help, we point them in the right direction.





HEALTH, SAFETY AND SECURITY

WE ALWAYS ...

Look out for each other	Follow our policies	Observe safe work practices	Report job-related injuries as well as workplace hazards or unsafe conditions
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WE NEVER ...

Take shortcuts	Ignore posted warning signs	Undertake tasks for which we haven’t been trained	Skip required personal protective equipment
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“IMT AND THE OSHKOSH WAY PREACH SAFETY AND FAMILY VALUES, GIVING EMPLOYEES THE TOOLS TO STAY SAFE AT WORK AS WELL AS AT HOME.”

- A team member in Garner, Iowa



Learn more

[Employee Assistance Program \(EAP\)](#)

[Corporate Safety Policy](#)

[Drug & Alcohol Testing Policy](#)

[Workplace Violence Prevention Policy](#)

[Weapon-Free Workplace Policy](#)



# Charitable activities and contributions

When it comes to supporting communities, we are quick to raise our hand. At a corporate level, a segment level, a team level and a personal level, we apply our vision for moving the world forward to everyday acts in the communities where we live and work.

As a company, the Oshkosh Corporation Foundation and our business segments partner with organizations down the street and across the globe to support a variety of initiatives, giving back to make a difference.

Team members not only support Oshkosh corporate initiatives, but also volunteer their own time, talents and resources to support causes they're passionate about. Together, we're going beyond helping, to transforming—it's all part of our People First culture.



## The Oshkosh Way in action Giving back the right way

We support causes the right way by:

- Getting approval before using Oshkosh resources including time and funds
- Never giving or accepting charitable donations in exchange for business favors or advantage





CHARITABLE ACTIVITIES AND CONTRIBUTIONS

3 WAYS WE BUILD STRONGER COMMUNITIES

1.

Volunteer our time  
and talent

2.

Partner with other  
organizations like  
United Way and  
Habitat for Humanity

3.

Support industry-  
related causes that  
support those who  
use our products, to  
make a difference



**Learn more**  
[Team Member Volunteerism Policy](#)



# We do the right thing

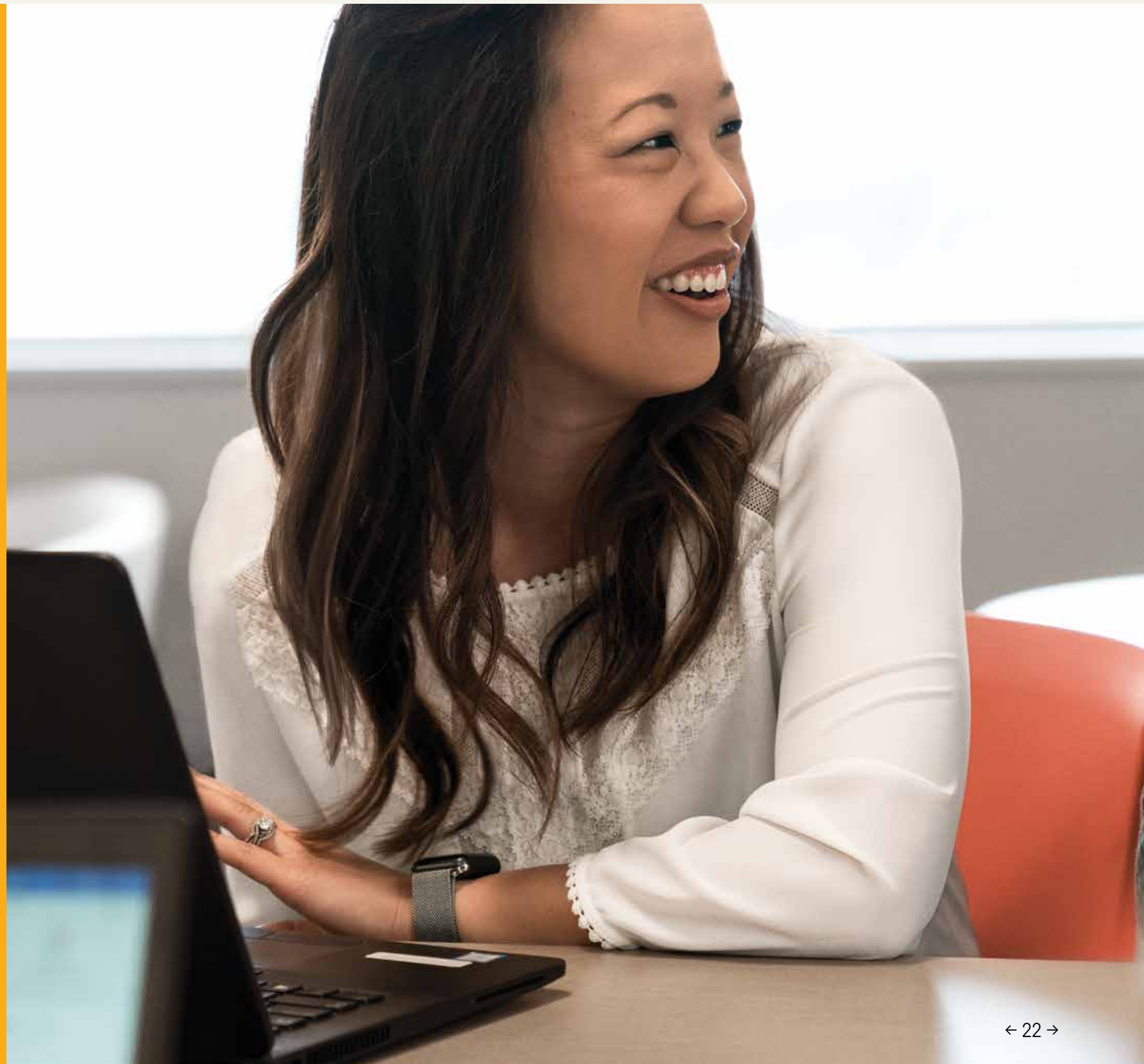
[Product quality and safety](#)

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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 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. 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.

**“OSHKOSH CORE VALUES ARE SOUNDLY EMBEDDED IN OUR PRODUCTS, WHICH MAKE OUR BRANDS RESPECTED GLOBALLY.”**

- A team member in Beijing, China

**WHAT IF A NEW TEAM MEMBER SUGGESTED SKIPPING A QUALITY CHECK TO ENSURE WE MEET OUR PRODUCTION DEADLINE?**

**EXPLAIN WHY WE NEVER COMPROMISE OUR VALUES OR QUALITY STANDARDS HERE AT OSHKOSH.**



## The Oshkosh Way in action

### Our quality management system

We have a comprehensive quality management system in place that ensures customer satisfaction. By applying advanced product quality planning, we can identify potential problems. Corrective action review boards embedded in each business segment then help us address and resolve any issues.



# Business partners

Our suppliers, contractors, distributors, and all partners representing our company are an extension of the Oshkosh family, and their actions—both ethical and unethical—can have an impact on the quality of our products, the safety of our customers and the trust associated with the Oshkosh name. That’s why we’re careful about who we work with and partner with those who share our values.

We also base our sourcing decisions on a rigorous process and objective criteria such as quality, price, service and delivery record. Then, we set clear expectations and actively monitor their work to make sure our partners honor their contractual obligations and commitment to our values. Our Supplier Code of Conduct lays out the expectations we have for our network of business partners and helps them meet our high standards.

## **WHAT IF** I DISCOVERED ONE OF OUR DISTRIBUTORS WAS INVOLVED IN A BRIBERY ATTEMPT?

**IMMEDIATELY LET YOUR LEADER KNOW, BECAUSE THEIR ACTIONS COULD IMPACT THE REPUTATION OF OSHKOSH.**

## 5 WAYS WE BUILD STRONG PARTNERSHIPS

- 1. Partner with the Global Ethics & Compliance Team to ensure proper due diligence is completed for all business partners**
- 2. Make sure business partners know and comply with our anti-bribery and anti-corruption policies**
- 3. Avoid any behavior that could suggest even the appearance of a conflict of interest**
- 4. Make sure suppliers understand that the requirements in our government contracts flow down to them**
- 5. Protect the confidential information and intellectual property of our business partners and ensure they protect ours**

**Learn more**

[Supplier Code of Conduct](#)





# 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 our government customers' classified information.

**WHAT IF** I SAW AN ENTRY WAS ASSIGNED TO THE WRONG PROJECT?  
**MAKE SURE IT IS CORRECT BEFORE WE SUBMIT IT.**



## The Oshkosh Way in action Procurement compliance

We 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)



GOVERNMENT BUSINESS

WE ALWAYS ...

Use current, accurate and certified cost and pricing data

Provide accurate and truthful information (in proposals, quotes, invoices, reports and other certifications, representations and communications)

Protect classified information and government property

WE NEVER ...

Seek source selection information or contractor bid or proposal information

Try to obtain or use unauthorized information about our competitors

Break the rules when it comes to hiring current or former government team employees—contact the Defense Legal Team before entering into any discussions

Reach out to the Industrial Security Team or Defense Legal Team for more information or for any questions or concerns.



Learn more

FAR/DFARS

The Truthful Cost or Pricing Data Act, formerly known as the Truth in Negotiations Act (TINA)





# Conflicts of interest

As team members, we have a responsibility to do what’s right for our company. Any outside activity, interest or relationship that affects our ability to make fair, objective decisions for Oshkosh could pose a conflict of interest. Even the perception of a conflict can erode trust. If our actions (or the actions of our family members) would make others question our motives or our loyalty to Oshkosh, we avoid it.

It’s not always easy to spot conflicts of interest, but there are certain situations where they typically arise. 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, we disclose the potential conflict—or the appearance of one—to our leader and the Global Ethics & Compliance Team immediately, so that we can work together to address it, manage it or steer clear of it.

## **WHAT IF** MY WIFE WAS OFFERED A POSITION WITH ONE OF OUR COMPETITORS?

**DISCLOSE THE POTENTIAL CONFLICT OF INTEREST TO YOUR LEADER AND THE GLOBAL ETHICS & COMPLIANCE TEAM IMMEDIATELY.**

## NOT SURE?

In trying to decide if a situation could present a conflict, we ask ourselves:

1.

**Could this situation interfere with my responsibilities at Oshkosh?**

2.

**Could it affect the decisions I make for Oshkosh?**

3.

**Would others (inside or outside of Oshkosh) view this as a conflict?**

If the answer to any question is “**yes**” or “**I’m not sure,**” there may be a potential conflict, so we ask for guidance before we act.



CONFLICTS OF INTEREST

SITUATIONS WHERE CONFLICTS TYPICALLY ARISE

You have a direct reporting relationship with family or friends

You, your family or close personal friend have a financial interest in a company that buys from or sells to Oshkosh

You, your family or close personal friend own or work for a competitor or a company that works (or wants to work) for Oshkosh

You use Oshkosh assets, property or information to support a personal interest

You take for yourself an opportunity that belongs to Oshkosh

You serve as a board member for a company, and it interferes with your obligations to Oshkosh

It’s not possible to list every potential conflict of interest—it’s always best to be transparent and disclose any situation you’re unsure about to the Global Ethics & Compliance Team.



Learn more

- Conflicts of Interest Policy
- Anti-bribery & Anti-corruption Policy
- Gifts & Entertainment Policy





# 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 always want to avoid situations that make it appear our business decisions were influenced by anything we were offered or accepted.

That’s why Oshkosh has rules in place that describe what’s appropriate ... and what’s not. Following these rules is the best way to not only avoid conflicts and the appearance of anything improper, but also to maintain the trust of our customers and business partners.

We make sure that anything given or received is nominal in value and properly documented. We speak up about any improper offers. And we are mindful, in every situation, that an offer of **any** value that’s made in order to win business or a business advantage—even if it complies with our policies—is wrong (see the [Anti-bribery and anti-corruption](#) section).

**WHAT IF I WERE AT A BUSINESS DINNER AT A VERY EXPENSIVE RESTAURANT AND A SUPPLIER OFFERED TO PAY FOR MY MEAL?**

**POLITELY SAY “NO, THANK YOU.” ACCEPTING THE FREE MEAL WOULD MAKE IT LOOK LIKE THE SUPPLIER WAS BUYING YOUR BUSINESS DECISIONS AND WOULD VIOLATE OUR POLICIES.**



## WHAT IS “NOMINAL”?

It’s a gift or offer of entertainment that isn’t lavish and hasn’t been given frequently. Keep in mind that business-related entertainment that is not extravagant is acceptable. For example, you can attend a regular season baseball game if a supplier is taking you as a guest. However, if the supplier is just giving you tickets to the game, that is a gift and probably unacceptable.

In general, team members may not accept gifts over \$100 USD from anyone who has or seeks a business relationship with our company.



GIFTS AND ENTERTAINMENT

ANYTHING WE GIVE MUST ...

Be reasonable

Support a legitimate  
business purpose

Not violate the policies of  
the recipient

ANYTHING WE ACCEPT MUST ...

Never go beyond common  
business courtesies

Not be cash or a cash  
equivalent (like gift cards,  
stored value cards or gift  
certificates)

Not be given during a  
purchasing or contracting  
decision

Working with a government employee? Remember that includes anyone employed by a government entity (fire departments, municipalities, government-owned schools, etc.). The rules around what we may give and accept are very strict—we don’t offer anything of value to government personnel unless we have approval in advance from the Defense Legal Team or Global Ethics & Compliance Team.



Learn more

[Conflicts of Interest Policy](#)

[Gifts & Entertainment Policy](#)

[Anti-bribery & Anti-corruption Policy](#)





# We persevere

[Anti-bribery and anti-corruption](#)

[Fair competition](#)

[Insider trading](#)

[Global business](#)

[Political activities and lobbying](#)





# Anti-bribery and anti-corruption

If something doesn’t seem right, it probably isn’t right. Bribery can be a cash payment. But it can take many other forms, too. Basically, anything of value that’s offered in exchange for an unfair advantage is a bribe and prohibited by our policies and the law.

We win business based on the quality of our products and the passion of our people. We never bribe, and we don’t allow others to bribe for us. Our due diligence process helps us make sure the third parties we partner with also do business the right way.

**“TO BE KNOWN AS ONE OF THE MOST ETHICAL COMPANIES IN THE WORLD, MAKES IT CLEAR TO EVERYONE WHERE WE STAND ON ETHICAL ISSUES FROM THE GET-GO AND HELPS IN REDUCING AWKWARD SITUATIONS.”**

- A team member in Dubai, United Arab Emirates

## 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

## The Oshkosh Way in action

### Facilitation payments

We do not make facilitation payments. These are modest payments made outside of normal processes to expedite routine governmental actions such as:

- Visa processing
- Clearing customs
- Securing police or fire protection
- Obtaining permits

### Learn more

Anti-bribery & Anti-corruption Policy

Gifts & Entertainment Policy

Corruption Red Flags





# Fair competition

Attempts to restrict full and fair competition are not only unfair—they're illegal. If we are ever in a situation where the conversation turns to a competitively sensitive topic, we put a stop to it, making it clear that the discussion is inappropriate. Then, we remove ourselves from the situation and report the incident to our leader immediately.

We all benefit from a thriving marketplace. Competition allows customers to benefit from innovative products, a range of options and competitive prices. That's why countries around the world have enacted laws (usually referred to as “antitrust” or “competition” laws) that prohibit anti-competitive behavior, and we follow them everywhere we operate.

We also do the right thing when it comes to gathering competitive intelligence. One of our competitive advantages is our ethical reputation and commitment to doing business the Oshkosh Way.

**WHAT IF A COMPETITOR APPROACHED ME AT AN INDUSTRY TRADE SHOW AND SUGGESTED WE AGREE TO BID ONLY ON CERTAIN CONTRACTS? IMMEDIATELY WALK AWAY FROM THE CONVERSATION AND REPORT IT TO YOUR LEADER.**



## The Oshkosh Way in action Anti-competitive behavior

We avoid anti-competitive behavior. We don't even discuss with competitors subjects like dividing up business, boycotting specific suppliers or customers or fixing prices. We don't share details about our bids and quotes with competitors or attempt to get details about our competitors' bids and quotes. And we don't make false claims about our competitors' products.





## FAIR COMPETITION

### 5 WAYS WE GATHER COMPETITIVE INTELLIGENCE THE RIGHT WAY

- 1.** Only seek information through public sources (external websites, annual reports, marketing brochures, industry surveys)
- 2.** Always be honest about who we work for
- 3.** Don't pay anyone for nonpublic information
- 4.** Don't use deception to obtain competitive information
- 5.** Don't seek competitor information from people who previously worked or currently work for our competitors



**Learn more**

[Fair Competition Policy](#)





# Insider trading

Sometimes, as part of working for Oshkosh, we may hear or see information about our company or companies we work with that isn't known to the public. Knowing this information makes us “insiders,” and using this information to buy, sell or hold onto stock or securities is called “insider trading.” Insider trading is illegal. Passing along this information to others so they may trade is illegal, too.

We're in a position of trust when it comes to protecting material, nonpublic (“inside”) information. That's why it's important to understand the kinds of information considered inside information and never trade on it—or tip off others. By following our policies and observing any blackout periods, we comply with the law and keep information protected from illegal use or disclosure.

## **WHAT IF I KNOW CERTAIN INFORMATION ABOUT OSHKOSH BECAUSE I AM A TEAM MEMBER?**

**REMEMBER THAT YOU ARE AN “INSIDER” AND MAKE SURE YOU NEVER TRADE OR TIP OTHERS BASED ON THAT INFORMATION.**

## **EXAMPLES OF INSIDE INFORMATION INCLUDE YET-TO-BE ANNOUNCED INFORMATION ABOUT ...**

New products or services	Proposed mergers or acquisitions	Projections of future earnings or losses
The gain or loss of a major customer or supplier	Changes to the executive leadership team	Pending lawsuits

## **WHAT DO THE WORDS “MATERIAL” AND “NONPUBLIC” MEAN?**

“**Material**” means information that an investor would consider important in making a decision to buy or sell stock.

“**Nonpublic**” means the information has not been released outside of our company (through a press release, for example).

### **Learn more**

[Insider Trading Policy](#)



# Global business

The ability to ship our products all over the world is a privilege, and one we don't take for granted. To preserve our ability to conduct business across borders, we follow the rules. And we speak up if we see that the rules have been broken, even if it's an inadvertent paperwork error.

Each of us has a responsibility to understand and comply with the trade laws, regulations and restrictions in the countries where we operate. And we also have a responsibility to make sure those in our supply chain do the same. The requirements are complex and constantly changing, but together we make sure we follow all applicable laws and maintain our reputation as a company that does business the right way.

**WHAT IF I NOTICED ONE OF OUR CUSTOMS BROKERS INCORRECTLY CLAIMED DUTY-FREE STATUS ON SEVERAL SHIPMENTS OF OUR PRODUCTS? MAKE SURE IT IS CORRECTED.**



## The Oshkosh Way in action Trade embargoes and boycotts

As a U.S.-based company, we don't conduct business with countries that are subject to United States or other applicable trade embargoes or economic sanctions.

Also, we don't participate in boycotts unsanctioned by the United States. We direct any request to comply with a boycott (or requests to supply boycott-related information) to the [Global Export Controls Shared Services Group](#).





## GLOBAL BUSINESS

### 4 THINGS WE CAN DO

- 1.** Make sure anything we import or export is properly classified based on the country of origin, the destination, control list number and the end use/end user
- 2.** Obtain any required licenses, document all transactions accurately and retain all required records
- 3.** Don't market to, sell or partner with countries, organizations or people that are restricted or sanctioned
- 4.** Monitor business partners—don't ignore behavior that could be unlawful



#### Learn more

[ITAR/EAR Policies & Procedures](#)

[FAR/DFARS](#)

[Foreign Visitor Policy](#)



# Political activities and lobbying

Oshkosh encourages team members to play an active role in the communities where they live and work. However, it's important that we keep our personal political activities separate from our work at Oshkosh. We work directly with governments every day, which means we need to be even more committed to engaging in politics and political activity legally and ethically. As individuals, we participate in the political process on our own time, at our own expense, using our own resources. We embrace the idea that each of us has the right to our own political views and the responsibility to respect others' rights to theirs.

Oshkosh doesn't make political contributions and will not reimburse team members for contributions they make. Our company does have a political action committee through which team members can support political causes that directly impact our company, products or industry. Participation with the Oshkosh Corporate Employee Political Action Committee (OCEPAC) is completely voluntary and closely regulated by the Federal Election Commission.

**WHAT IF MY SISTER WAS RUNNING FOR POLITICAL OFFICE AND ASKED ME TO DISTRIBUTE CAMPAIGN BROCHURES TO MY FELLOW TEAM MEMBERS?**

**TELL HER, "NO" BECAUSE PERSONAL POLITICAL ACTIVITIES NEED TO STAY CLEARLY SEPARATE FROM YOUR ROLE WITH OSHKOSH.**



## WE ALWAYS ...

Make sure our political activities are lawful and consistent with Oshkosh policies

Disclose that we are employed by Oshkosh and make it clear that our views don't represent those of the company

Contact the [Senior Vice President of Government Relations](#) before talking to lawmakers about legislation affecting Oshkosh

## WE NEVER ...

Pressure fellow team members, vendors or customers to contribute to—or support—our political activities

Contact lawmakers or government employees to influence an award of contracts to Oshkosh

Use the Oshkosh name to promote a party, candidate or cause unless we have authorization to do so

**Learn more**  
[Lobbying Policy](#)





# We are better together

[Confidential information](#)

[Physical and electronic assets](#)

[Accurate records](#)

[Responsible communications](#)

[Sustainability and the environment](#)







# Confidential information

Our passion for innovation moves the world forward. In order to continue to design and build products that challenge today's limits, we protect our confidential information and the confidential information entrusted to us by our partners and customers.

We make sure we know the type of information considered confidential, we classify and mark it properly, and we share it only with those who are authorized to see it and have a business need to know it. If we're not sure how to classify information, we check with the data owner.

We protect our company's proprietary information from unauthorized use, distribution, alteration or deletion. We require that all third parties sign non-disclosure agreements before we share information with them, and we only share what's necessary to achieve our goals. We are also careful about **where** we share it, because discussions about confidential information in public places (such as restaurants, airports and elevators) can be heard by others outside of Oshkosh. This could hurt our competitive advantage and damage our reputation as a leader in the industry.

**WHAT IF A FRIEND WHO WAS STARTING A NEW BUSINESS ASKED FOR A LIST OF OSHKOSH CUSTOMERS WHO MIGHT BE INTERESTED IN HER SERVICES? LET HER KNOW YOU CANNOT GIVE HER THAT INFORMATION BECAUSE IT IS THE PROPERTY OF OSHKOSH.**



## WHAT IS “INTELLECTUAL PROPERTY”?

It's the collection of creative thoughts, ideas and processes behind our products. It includes patents, technical data, copyrights, trademarks and trade secrets. We have an obligation to protect our intellectual property and respect the intellectual property of others. We always get the necessary authorizations and licensing agreements, and properly use trademarks, copyrights, logos and designs.





CONFIDENTIAL INFORMATION

EXAMPLES OF CONFIDENTIAL INFORMATION INCLUDE ...

Marketing plans, customer lists and supplier lists	Research and development plans	Product drawings, designs and processes
Procurement data	Pricing strategies	Unpublished financial information



Learn more

Classification & Handling of Confidential & Privileged Information Policy  
Data Classification Guidelines



# Physical and electronic assets

Oshkosh provides physical assets (like furniture, equipment and office supplies), as well as electronic assets (like hardware, software and internet access) to help us do our jobs. We have an obligation to be good stewards of these resources, using them in the way they're supposed to be used and protecting them from damage or loss.

We use company assets for company business. Occasional use of assets for personal reasons is permitted, but we understand that our use should be truly occasional and never interfere with our responsibilities at Oshkosh. We safeguard our assets and observe both good cybersecurity and good physical security practices, so that every team member in every location has what they need to do their very best work.

**WHAT IF I LEARNED ABOUT SOME FREE SOFTWARE THAT COULD HELP MY TEAM MANAGE PROJECTS?**

**FOLLOW ALL PROPER TECHNOLOGY REQUESTS AND AUTHORIZATION PROCESSES TO MAKE SURE IT DOES NOT PUT ANY OSHKOSH DEVICE OR SYSTEM AT RISK.**



## The Oshkosh Way in action Our information security responsibilities

We respond quickly to implement new required security controls. We always keep in mind and look for the security implications of everything we do.





PHYSICAL AND ELECTRONIC ASSETS

GOOD CYBERSECURITY MEANS  
WE ALWAYS ...

Create strong passwords  
and store them properly

Use a browser, email,  
text or phone to ensure  
attachments are  
expected and that we’re  
communicating with the  
intended party

Access our networks  
with authorized devices,  
including storage

Use only authorized  
software and applications

Speak up about any misuse  
or abuse of our systems

WE NEVER ...

Share passwords or other  
access controls with anyone  
or reuse work passwords  
outside the company

Click on suspicious files  
or links that could put our  
systems at risk

Ignore or delete suspicious  
activities

Lend, borrow, sell or give  
away any technology  
assets unless we’re  
authorized to do so

Delay reporting lost or  
damaged assets



Learn more

[Acceptable Use Policy](#)



# Accurate records

We have earned a reputation for operating honestly, transparently and with integrity. We maintain that reputation by following our internal controls, maintaining accurate records, providing supporting documentation and seeking approvals, when required, and speaking up if we suspect an error. It’s better to be proactive and correct our mistakes than to stay silent when we know something is wrong.

Accurate recordkeeping is everyone’s responsibility. This is true whether we’re filling out a timesheet, submitting an expense report, generating a proposal, preparing a financial forecast or creating any other “record.”

Accurate recordkeeping also means complying with our policies that relate to retaining, protecting, storing and disposing of data—we follow our retention schedules, and we never dispose of information that could be required for a legal proceeding.

**“THE OSHKOSH WAY GIVES ME A CLEARER UNDERSTANDING AND GUIDANCE WHEN DECIDING IF THE REPORTED EXPENSES ARE REASONABLE OR NOT. I REALLY LIKE IT.”**

- A team member in Tianjin, China

## WE ALWAYS ...

Make sure our records accurately and fairly reflect all transactions

Assign costs to the proper account code and the correct time period

Watch for and report suspicious activities, such as large cash deposits or unusual fund transfers between one country and another

## WE NEVER ...

Establish any unrecorded, “off the books” or “slush” funds

Falsify or mischaracterize any record that relates to our business

Exceed our authority—we don’t sign documents or authorize payments unless designated to do so

## The Oshkosh Way in action

### Accuracy in all our financial reporting

The integrity of our books and records is critical to our future success and to maintaining the trust of customers, business partners and investors.

We are committed to financial integrity. We make sure that all reports are full, fair, accurate, timely and understandable. And we comply and cooperate with government audits, investigations and inquiries by providing truthful, accurate and complete information.

### Learn more

- Records Management Policy
- Account Reconciliation Policy
- CAPP Manual





# Responsible communications

Every word about our company—whether spoken, written or released into cyberspace—has an impact on our reputation and our brand. We ensure the messages we send are clear, accurate and consistent. We refer questions and requests for information to people who are authorized by Oshkosh to speak on the company’s behalf.

Unless designated as a spokesperson, we direct inquiries—from the public, regulatory authorities and others—to the proper resource. At times (in the interest of protecting Oshkosh) we may be tempted to be helpful, provide our insight or set the record straight, but always rely on the communications experts. They will ensure we speak with one voice.

**WHAT IF SOMEONE FROM THE MEDIA CONTACTED ME WITH A QUESTION ABOUT OSHKOSH?**

**ASK THEM TO CONTACT OUR GLOBAL BRANDING & COMMUNICATIONS TEAM.**

## FOR

Media inquiries

Analyst or investor inquiries

Invitations to speak or present on behalf of Oshkosh

## CONTACT

[Global Branding & Communications Team](#)

[Investor Relations](#)

[Global Branding & Communications Team](#)

## The Oshkosh Way in action

### Responsible use of social media

Our commitment to communicating responsibly extends to our social media activity. We make sure that any personal opinions we express online are identified as our own and that we don’t post anything that would be harassing or discriminatory or breach the confidential information of Oshkosh or our business partners.

**Learn more**

[Social Media Policy](#)



# Sustainability and the environment

We believe that sustainability goes beyond our environmental responsibility. It's a mindset, a way of thinking about our planet and our impact on it—as both a company and as individuals—in every action we take. We promote environmental accountability and stewardship. We innovate thoughtfully to deliver products that keep those who rely on them and their communities safer and healthier.

We follow all environmental laws, policies and procedures that apply to us and have implemented an Environmental Compliance Assessment Program (eCAP) at our facilities. And we recognize sustainability is a shared responsibility.

**WHAT IF** I HAD IDEAS ABOUT HOW TO BETTER CONSERVE RESOURCES AT MY FACILITY?

**REACH OUT TO SOMEONE ON THE ENVIRONMENTAL TEAM.**

## 5 THINGS WE CAN DO

- 1. Take personal responsibility for helping to reduce waste and emissions**
- 2. Look for opportunities to conserve energy in our facilities, processes and vehicles**
- 3. Safely dispose of all waste products, reusing and recycling whenever possible**
- 4. Share our ideas—The Oshkosh Excellence Awards (OEA) offer an opportunity to not only innovate but build a more sustainable world**
- 5. Report any environmental incident—or the possibility of one—to the Environmental Team**

### Learn more

[Environmental Protection Policy](#)

[Energy Management Policy](#)

[Corporate Sustainability Report](#)

[Supplier Code of Conduct](#)





# Living our values— closing thoughts from the Global Ethics & Compliance Team

Our commitment to doing the right thing is grounded in our purpose, making a difference in people’s lives. By striving to live the Oshkosh Way and demonstrating our core values every day, we are making a positive impact on the lives of our fellow team members, customers, shareholders, business partners and communities.

The Global Ethics & Compliance Team is always happy to help with any questions you may have regarding the Code and how to apply it to your everyday work. Please read and refer to our Code often, and let it be a valuable guide when making business decisions. As we continue to grow and evolve, always stay true to our values, and remember that every decision you make affects who we are and where we go from here.

**Thank you for your commitment to Oshkosh and our Code of Ethics and Conduct.**

**“WHENEVER I’M IN DOUBT, I GO BACK TO ETHICS AND USE IT AS MY INNER COMPASS. IT WILL LEAD ME THE RIGHT WAY.”**

- A team member in Hoofddorp, Netherlands





# Helpful resources

## CONTACT

Ethics Helpline

Corporate Safety Team

Cybersecurity

Environmental Team

Global Branding & Communications Team

Global Ethics & Compliance Team

Global Export Controls Shared Services Group

Human Resources

Industrial Security Team

Investor Relations

Privacy Officer

Senior Vice President of Government Relations

## CONTACT INFORMATION

[Ethics Helpline](#)

[jhavlik@oshkoshcorp.com](mailto:jhavlik@oshkoshcorp.com)

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A portfolio of leading brands.  
One unified business.

