

# Human Trafficking Compliance Plan

## Introduction

This document is meant to be a practical resource and a compliance plan for applicable human trafficking laws and regulations that affect Oshkosh Corporation's business practices.

The purpose of this plan is to ensure that Oshkosh Corporation and each of its subsidiaries (collectively referred to herein as the "Company") comply with applicable human trafficking laws and regulations globally. These human trafficking laws and regulations include the Trafficking Victims Protection Act of 2000 (TVPA), the Federal Acquisition Regulation (FAR) subpart 22.17, The United Kingdom Modern Slavery Act 2015, the California Transparency in Supply Chains Act of 2010, and local human trafficking laws and regulations in any countries in which the Company does or intends to do business. This plan applies globally to all employees, officers, and directors of the Company and any third party acting on the Company's behalf. This plan describes the program and processes established and implemented by the Company to comply with requirements of FAR 52.222-50 Combating Trafficking in Persons, the United Kingdom Modern Slavery Act 2015, and the California Transparency in Supply Chains Act of 2010 to have a compliance plan and a slavery and human trafficking statement.

## Our Business

Oshkosh Corporation is a global company that manufactures and markets access equipment, specialty vehicles and truck bodies for the primary markets of defense, concrete placement, refuse hauling, access equipment and fire & emergency. Further information on our business can be found on the following - [oshkoshcorporation.com](http://oshkoshcorporation.com).

## Global Ethics & Compliance

This plan is maintained by the Company's Global Ethics and Compliance Group. The mission of the Global Ethics & Compliance program is to create a framework of compliance controls and trained personnel throughout the Company to facilitate a culture committed to conducting business with integrity, in accordance with the highest ethical standards and in compliance with applicable laws and regulations. This mission is guided by Oshkosh Corporation's Core Values: We put people first, we do the right things, we persevere, and we are better together. The guidelines, laws, regulations, policies and procedures that govern our conduct as employees and contractors of Oshkosh Corporation are embodied in our Code of Ethics & Standards of Conduct - The Oshkosh Way.

## Compliance Requirements

This compliance plan explains Oshkosh Corporation's efforts related to human trafficking and will be published and maintained on our Company website in compliance with program requirements.

## U.S. Government's Federal Acquisition Regulation (FAR)

U.S. Government contractors awarded contracts that exceed \$500,000 are required to create and implement a compliance plan to prevent any prohibited activities in FAR subpart 22.17 Ending Trafficking in Persons and FAR 52.222-50 Combating Trafficking in Persons. The compliance plan must be maintained throughout the performance of the contract and must be appropriate to:

- the size and complexity of the contract; and
- the nature and scope of the activities to be performed for the Government, including the number of non-United States citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

The Company must provide the compliance plan to the Contracting Officer upon request and must post the relevant contents of the compliance plan at the workplace and on the Company's public website.

Our Company must notify our employees of the government's no-tolerance policy to human trafficking and must enforce penalties against our employees for non-compliance with the government's policy (penalties include but are not limited to: removal from the federal contract, reduction in benefits, and termination of employment). Our Company must fully cooperate with human trafficking related investigations and immediately notify the contracting officer and appropriate agency inspector regarding any "credible information" regarding a human trafficking violation by any of our employees. Our Company must also implement a compliance plan to train and educate our employees on human trafficking.

## California Transparency in Supply Chains Act

The California Legislature passed the California Transparency in Supply Chains Act of 2010 with the goal of ensuring that large retailers and manufacturers provide consumers with information on the organization's efforts to eradicate human trafficking in supply chains. Entities are required to disclose such efforts on their Company website.

## United Kingdom Modern Slavery Act 2015

The United Kingdom Modern Slavery Act 2015 is the first European initiative aimed at eliminating modern slavery and human trafficking from supply chains. The Act requires businesses to publish a slavery and human trafficking statement each fiscal year disclosing efforts to ensure that supply chains are free from slavery and human trafficking.

## Human Trafficking Policy – Oshkosh Corporation Corporate Policy

Human Trafficking is the subjection of persons to exploitative conditions that are tantamount to slavery. Human trafficking occurs when one person obtains or holds another person in compelled service via involuntary servitude, slavery, debt bondage, and/or forced labor. The U.S. government has a zero-tolerance policy against severe forms of human trafficking. Oshkosh Corporation also has a zero-tolerance approach towards human trafficking and requires that all Company employees, officers, and directors and any third party acting on behalf of the Company comply fully with applicable human trafficking laws and regulations, including relevant provisions of FAR 52.222-50 and the International Labour Organization's Convention.

The Company prohibits its employees and all subcontractors and agents from:

- Engaging in severe forms of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor;
- Destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a form and language accessible to the employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging employees recruitment fees;
- Failing to provide return transportation or pay return transportation costs upon the end of employment, for certain employees who are not nationals of the country in which the work is taking place (with some exceptions as specified under FAR 52.222-50(b)(7));
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document at least five days before an employee writing in a language the employee understands and contain a detailed description of the terms and conditions of employment.

## Definitions

Severe Forms of Human Trafficking - sex trafficking or the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

Commercial Sex Act - any sex act on account of which anything of value is given to or received by any person.

Forced Labor - knowingly providing or obtaining the labor or services of a person:

1. By threats of serious harm to, or physical restraint against, that person or another person;
2. By means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or
3. By means of the abuse or threatened abuse of law or the legal process.

Involuntary Servitude - includes a condition of servitude induced by means of:

1. Any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such conditions, that person or another person would suffer serious harm or physical restraint; or
2. The abuse or threatened abuse of the legal process.

## Employee Awareness Program

The Company has developed and implemented an awareness program to inform all employees about the U.S. and U.K. government prohibitions against human trafficking related activities, the activities prohibited, and the actions that will be taken against the employee for violations. Our employees are trained on:

- The Company Human Trafficking Policy and the Company's Code of Conduct, The Oshkosh Way;
- Consequences for violating Company policies; and
- The violation reporting process.

The Company offers additional training for employees with direct responsibility for supply chain management to increase their awareness of the risks of slavery and human trafficking and ways to mitigate those risks.

## Employee Reporting Process

Company employees are not expected to always know what to do in every situation. However, employees have a duty to seek help if something is unclear or causes concern and must speak up if they see or suspect conduct that creates the risk of a legal or ethical violation. This can always be done anonymously.

If employees want to report a concern or potential violation, multiple resources are available. Company employees are encouraged to contact:

- a Supervisor/Manager,
- the Human Resources department,
- the Global Ethics & Compliance Group,
- the Legal Department,
- contacts identified in corporate policies and procedures, or
- the Ethics Helpline (1.866.554.3844 or <https://secure.ethicspoint.com/domain/media/en/gui/55824/index.html>)

The Ethics Helpline also has international country helpline numbers which are available on the Company intranet site and on the Ethics Helpline website. Additionally, activity inconsistent with this policy prohibiting trafficking in persons can be reported, without fear of retaliation, to the Global Human Trafficking Hotline at 1.844.888.FREE or email [help@befree.org](mailto:help@befree.org).

Please refer to our Company Code of Conduct, The Oshkosh Way, for more detailed information on how to use the Ethics Helpline and our Non-Retaliation Policy.

## Recruitment and Wage Plan

In compliance with the laws and regulations regarding recruitment and wage plans, the Company has a compensation approach to provide competitive compensation compared to similar industries, organizational size, and geographic market. Within compensation the Company strives to recognize pay for performance of the individual employee as well as the education, skill, responsibilities, and related factors for the job. The Company has global compensation guidelines for our domestic and international locations. Oshkosh Corporation prohibits noncompliance with applicable minimum wage laws and requirements. The Company will provide employees with at least the minimum wage required by law and provide benefits and overtime compensation in compliance with applicable laws. When recruiting for contractors or subcontractors, our Company works with reputable third-party vendors that use a service agreement which prohibits vendors from charging recruitment fees to employees or holding passports or similar identity documents.

## Housing Plan

In compliance with all applicable laws and regulations, Oshkosh Corporation believes that workers have the right to a safe and healthy workplace that meets or exceeds international health and safety standards. If any worker is provided housing by Oshkosh Corporation, the Company will ensure that the housing provided meets or exceeds host-country housing and safety standards. Oshkosh Corporation works with a third-party global relocation company to provide workers with proper housing for their work assignments.

## Supply Chain

Our Company is committed to conducting business in accordance with our Code of Ethics and Standards of Business Conduct, The Oshkosh Way. We require all of our suppliers to have a clear understanding of our expectations and to comply with them in business practice. All suppliers are expected to read and fully comply with the principles in the Supplier Code of Conduct and The Oshkosh Way as a condition of doing business with our Company. The Oshkosh Way outlines the principles and requirements applicable to all of Oshkosh's suppliers where a supplier lacks its own code of ethics or its code contradicts or ignores any of its specific provisions. Unless local law limits a provision, or it specifically says otherwise, there are no exceptions to any of the principles or requirements of The Oshkosh Way.

## Monitoring

Oshkosh Corporation's purchasing organization is responsible for supporting and evaluating suppliers and may engage in monitoring activities to assess compliance with this Code of Conduct including onsite inspection of facilities and review of books and records. Oshkosh Corporation reserves the right to carry out unannounced inspections of suppliers either by internal Oshkosh Corporation staff or by a third party chosen by the Company.

## Risk Assessment

Our Company is committed to our zero-tolerance policy towards human trafficking and assesses the risks of human trafficking in our business and supply chain using the Trafficking Victim's Protection Act (TVPA) tier system and the annual Trafficking in Persons report compiled by the U.S. Department of State.

Using this risk-based approach, our Company has identified areas where our business and/or supply chains may be vulnerable to slavery and human trafficking and identified steps taken to manage that vulnerability.

Our Company provides our human trafficking policy to all of our employees along with training on The Oshkosh Way. Our Company's suppliers receive our Supplier Code of Conduct, The Oshkosh Way, and our Human Trafficking policy and compliance plan on the Company's supplier portal. Formal acknowledgement of this policy may be required by Oshkosh Corporation. The Human Trafficking policy and compliance plan are also available on our public external Company website for broad distribution and accessibility of our policy.

## Violation Monitoring, Reporting and Remediation

All suppliers and third parties of the Company are required by contract to fully cooperate with Company employees, contracting agencies, and other Federal agencies to conduct audits and investigations in compliance with the applicable laws and regulations.

In the event of the receipt of credible information alleging a violation, the Company will immediately:

- Ensure appropriate Company personnel are notified and, in turn, the contracting officer and agency inspector general for government contract work, as applicable, and
- Take appropriate corrective and preventive action, up to and including, the dismissal of Company employees and termination of contracts with subcontractors, suppliers and agents.

## Commitment

Oshkosh Corporation's Global Ethics and Compliance Group will review and update this compliance plan annually to observe any changes in applicable human trafficking laws and regulations and risk assessment as conducted by the U.S. Dept. of State Publication Office of the Under Secretary for Civilian Security, Democracy, and Human Rights which publishes the annual Trafficking in Persons Report.