THE OSHKOSH WAY
CODE OF ETHICS & STANDARDS OF CONDUCT
We are a global and diverse team, driven to provide superior returns for our shareholders. We build the world’s best specialty trucks and access equipment to be safe and reliable, even in the most dangerous and demanding conditions.

We lead and manage our company to do what is right in every aspect of our business. We choose long-term growth over short-term gain. We preserve our hard-earned reputation and continue a tradition of innovation and honest service that began when our first heavy-duty four-wheel-drive truck rolled off the line in 1917.

Oshkosh Corporation team members around the world allow us to apply a vast array of talents, backgrounds and perspectives to delight our customers and build the Oshkosh brands. Even more important than our diversity is what we have in common: our core values and a shared commitment to doing business the right way—The Oshkosh Way. That’s how our code of conduct gets its name.

Our products save lives, protect nations and build communities. This is a tremendous responsibility and one that we embrace.
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Message from the President and CEO

Oshkosh Corporation partners with customers to deliver superior solutions that safely and efficiently move people and materials at work, around the globe and around the clock.

Dear Team Members,

We are all leaders. We are vital members of a global team that is focused on delighting our customers and doing the right thing, The Oshkosh Way.

While we may be spread across the globe, dealing with complex challenges under different conditions, we can each rely on our core values to guide us: honesty, integrity, accountability, respect and citizenship. Together, they form the compass that has guided our Company since 1917. Our core values, along with the Oshkosh Operating System, drive us to improve relentlessly, and they help bind our powerfully diverse skill sets and backgrounds into One System, One Team, One Oshkosh.

The Oshkosh Way is more than just a document containing guiding principles and a summary of our policies. It’s a validation of everything we stand for and the trust we’ve built through decades of proven results. It’s a reminder that we say what we mean and do what we say. It’s a promise to our customers, business partners, shareholders and each other that no matter how difficult the road gets, we will never stop striving to deliver superior solutions that safely and efficiently move people and materials at work, around the globe and around the clock.

While The Oshkosh Way cannot provide you with specific guidance to cover every situation you might face, it can point you in the right direction and get you closer to finding the help you need. We each have a duty to know and understand The Oshkosh Way. We also share an obligation to help others uphold it and to report instances where its high standards are not being met. That’s what leaders do.

We each have the training, the knowledge and the resources to tackle almost any problem. But if we end up in a gray area where the answers aren’t clear, we can always turn to the one resource that has been there from the start—our core values. When we listen to them, we are guaranteed to find our way.

Respectfully,

Wilson Jones
President and Chief Executive Officer
The Access Equipment segment is comprised of JLG Industries, Inc. and Jerr-Dan Corporation. JLG is one of the world’s leading designer, manufacturer and marketer of aerial work platforms, telescopic material handlers and an array of complementary accessories that increase the versatility and efficiency of these products. These products are sold under the JLG and SkyTrak® brands. Jerr-Dan is a leading manufacturer of towing and recovery equipment including light-, medium- and heavy-duty carriers and wrecker, industrial transporters and four-car carriers.

Oshkosh Defense is a leading designer and manufacturer of tactical wheeled vehicles and life cycle sustainment services. For decades, Oshkosh has been mobilizing military and security forces around the globe by offering a full portfolio of heavy, medium, light and highly protected military vehicles to support our customers’ missions. In addition, Oshkosh offers advanced technologies, vehicle components and a complete range of sustainment and training services to optimize fleet readiness and performance.

The Oshkosh Corporation Fire & Emergency segment is a single-source designer and manufacturer of fire apparatus, homeland security vehicles, mobile command and control centers, satellite and broadcast communications vehicles, simulators and airport rescue firefighting and snow removal vehicles. Pierce, Oshkosh Airport Products, Frontline Communications and Kewaunee Fabrications are all brands under the Fire & Emergency segment.

The Commercial segment offers an array of products under the brand names of McNeilus, London, Oshkosh, CON-E-CO and Iowa Mold Tooling (IMT). Products include: front, rear and side loading refuse vehicles; front and rear discharge concrete mixers and portable and stationary batch plants; and field service and lubrication vehicles, highly specialized cranes, tire service vehicles, and other unique devices for construction, material handling, building supply, tire service, equipment dealer, public works, utility, railroad, refuse and mining markets worldwide. In addition, the McNeilus brand is known as an industry leader in compressed natural gas (CNG) systems and services.

While our skills and knowledge make us a strong team, our core values—honesty, integrity, accountability, respect and citizenship—make us even stronger and keep us on the right path. Sometimes it’s easy to know what’s right. Other times, it’s not as clear. Laws, policies and rules can guide us up to a point, but they cannot cover every situation. When the road takes an unexpected turn or appears blocked, we can rely on our core values to guide us.

**HONESTY**
We are always true to others. We are truthful in all our endeavors. We are honest and forthright with everyone. We say what we mean, and do what we say.

**INTEGRITY**
We are true to ourselves, our own moral principles, and our corporate values. We do the right thing even when nobody is watching. We make genuine promises, and our actions to fulfill them are honorable. We stand for what is right.

**ACCOUNTABILITY**
We honor our obligations and keep the commitments we make. We speak up and report concerns in the workplace without fear of retribution. We seek clarification and guidance whenever we have questions. We don’t seek to blame, but seek the truth to be able to improve all that we do.

**RESPECT**
We treat others with dignity and fairness. We are polite and courteous to one another under all circumstances. We appreciate the diversity of our workforce and our world. We celebrate the uniqueness of each person.

**CITIZENSHIP**
We obey the letter and spirit of all laws of all the countries where we do business. We do our part to make our communities, and our world, better places to live. We respect our environment.

Our core values are woven throughout The Oshkosh Way. They are the foundation for the standards and expectations of all team members. They will also guide and enable the right decisions and actions needed to continually delight customers for another hundred years.
A PRACTICAL RESOURCE

IMPACTS ALL OF US

Operating globally means that we must take into account laws and cultural norms that can vary significantly. In a complex, uncertain environment, clarity and consistency are vital. No document could anticipate or address every situation or question that might confront us. But when circumstances are difficult and choices are unclear, The Oshkosh Way is a tool we can rely on. The Oshkosh Way shows us how and where to get help when needed.

The Oshkosh Way applies to all directors, officers, team members, contractors, interns, consultants and agents of Oshkosh Corporation and its subsidiaries, divisions and affiliates throughout the world. Unless local law limits a provision or specifically contradicts it, there are no exceptions to any of the principles or requirements of The Oshkosh Way.

We all have a responsibility to follow The Oshkosh Way. This means that we:
• honor and apply our core values at all times
• keep our commitments to each other, customers, shareholders, business partners and our communities
• read, understand and adhere to The Oshkosh Way and know how it applies to our work
• take responsibility for our personal conduct and choices on the job
• speak up whenever we see or suspect something violates, or may violate, The Oshkosh Way
• lead by example, helping and influencing others in their choices and actions
• seek guidance from the person we report to, Human Resources or The Global Ethics & Compliance Group, whenever we have a question or concern

If we lead or supervise others, we have additional responsibilities to:
• foster a positive work environment where only ethical and legal behaviors are accepted and rewarded
• maintain accountability for following The Oshkosh Way, regardless of role or seniority
• model behaviors that follow The Oshkosh Way and support our core values
• communicate on a regular basis the importance of ethical practices and the long-term value of doing the right thing
• provide training to team members so they can perform their work properly
• use performance reviews to evaluate team members on how they achieve business objectives rather than simply looking at whether they achieve them
• foster an “open door” environment, helping team members feel comfortable raising concerns, responding appropriately and promptly when they do, and protecting them from retaliation
• identify and help to mitigate ethics and compliance risks, as well as other business risks
• create a safe work environment for our team members
• deliver superior quality products and services to our customers
SPEAKING UP 
AND SEEKING HELP

HOW TO RAISE CONCERNS

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

If you want to report a concern or potential violation, you have multiple ways to report it:

• Supervisor/Manager
• Human Resources
• The Global Ethics & Compliance Group
• The Legal Department
• Contacts identified in corporate policies and procedures
• The Code Connection Helpline

We do the right thing for our Company by speaking up. Whichever route you take, the resources and support system will be there to help see your concern through but we cannot help until you take that first step.

The Code Connection Helpline is available 24-hours-a-day, 7-days-a-week. You can ask questions, seek help and report potential violations. It is managed by an independent third party. All information received through the Code Connection Helpline is confidential, and only shared with individuals that have a business need-to-know. Anonymous reporting is available in some countries, including the United States.

It is your responsibility to report concerns of questionable accounting, internal accounting controls or auditing matters. Such reports will be promptly forwarded to the Audit Committee of the Board of Directors.

When a concern is raised, the Global Ethics & Compliance Group will ensure it is handled promptly, fairly and thoroughly, in accordance with our values and legal obligations. All team members are required to cooperate fully with any Oshkosh investigation or audit, sharing all pertinent knowledge with investigators and keeping potential evidence secure. Lack of cooperation or interfering with an investigation will be grounds for disciplinary action. After the facts are determined, a decision will be made. If necessary, corrective actions will be recommended, along with any measures that might prevent further incidents.

You can call the Code Connection Helpline or submit a report directly to the Code Connection website www.tnwinc.com/reportline/Oshkosh.

Oshkosh Corporation has zero tolerance for retaliation. If you raise a concern in good faith about a legal or ethical violation, discrimination, harassment, or any behavior that is in conflict with our policies or core values, you can be confident that your concern will be taken seriously.

Retaliation is a serious offense that will be met with disciplinary action, up to and including termination, of those responsible. If you feel someone has retaliated against you, immediately contact Human Resources or the Global Ethics & Compliance Group.

For more information, see our Non-Retaliation Policy.
We are One System, One Team, One Oshkosh: diverse, dedicated, and creative, working together The Oshkosh Way. We realize our mission of safely and efficiently moving people and materials at work starts with us.

OUR COMMITMENT TO TEAM MEMBERS

We are committed to working together as One Team, providing just and effective management and a safe, healthy workplace, while respecting every person’s dignity and privacy.

WHY WE KEEP TEAM MEMBERS SAFE, SECURE AND HEALTHY

Team members keep each other and our visitors safe and healthy, allowing us to focus on delivering high-quality, safe operating equipment to customers who face difficult and even dangerous conditions on a daily basis. Our equipment protects them as they protect and care for our communities and nations. Their safety depends on us.

HOW WE KEEP TEAM MEMBERS SAFE, SECURE AND HEALTHY

Our goal is to prevent injuries to all team members, suppliers, customers and visitors. To achieve this goal, we each take responsibility for proactively maintaining a safe work environment. This means we:

• utilize the Oshkosh Safety Management System (SMS) and provide annual funding to support work conditions that promote an injury-free workplace
• work together to design safe, standard work
• look out for each other and prevent or stop team members from working in unsafe conditions
• know, regularly practice and follow all crisis management procedures, including plans for dealing with natural disasters and environmental incidents
• follow all safety guidelines, policies, laws, and maintain Zero Tolerance Policies for drugs, alcohol, weapons and violence at work

MORE RESOURCES

• Employee Assistance Program (EAP)
• Corporate Safety Policy
• Drug and Alcohol Testing Policy
• Workplace Violence Policy
• Weapon-Free Workplace Policy
• Employee Handbook
• Evacuation Plan

VALUES IN ACTION

Q: I’m a forklift driver. My doctor has prescribed some medicine that can cause drowsiness. Since it’s legal and I haven’t felt drowsy, do I still have to report it?
A: Yes. By the time you realize its effects, it might be too late. Drug use at work—even if it’s prescription medicine—can impair judgment and reduce alertness, leading to accidents. It is important to inform your supervisor about the medication so you can be properly observed and evaluated to help ensure everyone’s safety.
FOSTERING A RESPECTFUL WORKPLACE

WHY WE FOSTER A RESPECTFUL WORKPLACE
As One Oshkosh, we are conscious of how we affect other team members. Words and actions that create an offensive, disruptive or hostile work environment, damage trust and deter open communication. They can lead to workplace injuries and prevent us from delighting our customers.

HOW WE FOSTER A RESPECTFUL WORKPLACE
Treating each team member with respect is a core value we honor. This means we:
• treat our team members, business partners, and customers with respect through our words and actions
• regularly communicate the expectation that everyone be treated respectfully
• do not tolerate any form of disrespectful conduct or unwanted conduct that degrades, disparages or intimidates others
• stand up and take accountability for reporting disrespectful conduct, even if we are not the direct target of it

MORE RESOURCES
• Harassment Prevention and Reporting Policy

VALUES IN ACTION

Q: My team member’s supervisor repeatedly comments about how young and muscular he is and often rubs his shoulders or touches him unnecessarily. But when I asked him about it, he insisted he’s fine and it’s no big deal. What should I do? A: You should make a report. Even if your team member is okay with it and does not want to be involved, there’s no denying the behavior is inappropriate and should be reported.

MORE RESOURCES

WHY WE PROMOTE EQUAL OPPORTUNITY
When everyone has an equal chance to succeed, we achieve the most for our customers and shareholders. Our team members are more satisfied and more efficient. Innovation and collaboration flourish, and recruitment improves as our reputation as a great place to work grows.

HOW WE PROMOTE EQUAL OPPORTUNITY
We hire and promote on merit. We prohibit any employment practice that discriminates against team members or applicants for employment with regard to compensation, terms, conditions or privileges of employment because of:
• Race—Color—Religion—National Origin—Gender—Age—Disability—Veteran Status—Marital Status—Citizenship Status—Creed—Sexual Orientation—Other protected categories as provided by applicable law

MORE RESOURCES
• Equal Employment Opportunity Policy
EMBRACING DIVERSITY AND INCLUSION

WHY WE EMBRACE DIVERSITY AND INCLUSION

Our diversity supports higher levels of customer, shareholder and employee satisfaction. It increases our skill set and broadens our perspective. It helps us better understand our diverse customers and demonstrates that we care about their experience as part of the Oshkosh community. Our team members are what separate us from our competition. We count on our wide variety of skills and life experiences to help us connect with and delight our customers around the globe as One Oshkosh.

HOW WE EMBRACE DIVERSITY AND INCLUSION

Oshkosh actively supports diversity and inclusion on all levels, in all of our workplaces around the world. This means we:
• seek to reflect our diverse customer base and the communities where we work
• cultivate a diverse and inclusive workplace
• foster a work environment that encourages learning and collaboration
• take responsibility for making sure everyone counts and everyone’s voice is heard
• encourage each other to speak up and continually improve

MORE RESOURCES
• Equal Employment Opportunity Policy
• Affirmative Action Policy

PROTECTING TEAM MEMBER INFORMATION

WHY WE PROTECT TEAM MEMBER INFORMATION

Oshkosh needs to collect, store and occasionally share personal information to conduct business and take care of benefits. We respect our team members’ privacy and strive to prevent the unauthorized disclosure of team member personal information. We understand the extensive damage one simple leak can do. By acting as stewards of our team members’ personal information and treating it with respect and accountability, we increase trust and strengthen the bonds that make us One Oshkosh.

HOW WE PROTECT TEAM MEMBER INFORMATION

Oshkosh fulfills its duty to protect each team member’s personal, medical and financial records by:
• applying rigorous standards of protection to all private team member information and staying alert to the security implications of all we do
• collecting and storing team member information only as long as is necessary and sharing it only on a need-to-know basis for legitimate business reasons
• following the personal identification information (PII) handling procedures
• following all applicable data privacy laws and Oshkosh security policies

MORE RESOURCES
• Classification and Handling of Confidential & Privileged Information Policy
• Acceptable Use Policy
• Personal Identification Information (PII) Handling Procedure/Policy

VALUES IN ACTION

Q: One of my former team members called me recently and asked for the address of a current team member so he could send her a thank you note for helping him get a new job. I know they were friends when he worked here. Is it okay to give him the address?

A: No, do not give out the address. Not only is it against our policy but it’s also potentially unsafe. The former team member needs to get the address directly from your current team member.
WHY WE USE SOCIAL MEDIA RESPONSIBLY

Anything posted through social media becomes public information. Even a post that puts Oshkosh in a positive light could be damaging if it contains sensitive information.

To ensure public information is accurate, it is important that Company-related posts are pre-authorized by the Company before posted. By leaving Company-related posts to the Oshkosh Communications team, we can prevent potential mistakes and strengthen connections with our customers, business partners and communities.

HOW WE USE SOCIAL MEDIA RESPONSIBLY

We have the ability to reach thousands or even millions of people with a single social media post, so we post responsibly. This means we:

• do not post information about Oshkosh unless we are specifically authorized to do so
• are honest about our identities as Oshkosh team members and make it clear when we are expressing personal views
• do not disclose confidential information involving Oshkosh, our business partners or our customers, including trade secrets, contract details, upcoming products, expansion plans, proprietary processes and formulas and classified government information
• do not post content that uses the Oshkosh name to endorse products or causes
• recognize that what we say about our team members, customers and suppliers online could hurt Oshkosh and our ability to do our own jobs
• do not let our activities on social media interfere with our job responsibilities at Oshkosh

VALUES IN ACTION

Q: Oshkosh just won a big contract. Can I offer congratulations via Twitter?
A: Yes, as long as the information is already public.

MORE RESOURCES

• Social Media Policy
• Acceptable Use Policy
• Insider Trading Policy

USING SOCIAL MEDIA RESPONSIBLY

WE ARE DEDICATED TO SERVING AND DELIGHTING OUR CUSTOMERS AS WE DESIGN, BUILD AND DELIVER HIGH-QUALITY SPECIALTY VEHICLES AND EQUIPMENT. OUR UNYIELDING COMMITMENT TO QUALITY STRENGTHENS OUR REPutation AND keeper OUR CUSTOMERS COMING BACK.

OUR COMMITMENT TO CUSTOMERS

We are committed to providing safe and superior-quality products, service and technologies at competitive prices, delivered as promised.
DELLIVERING SAFE, HIGH-QUALITY PRODUCTS

Our customers work in difficult and demanding conditions. They must be able to completely trust the performance and reliability of our products. We deliver high-quality products. We know this saves lives and our customers expect nothing less.

HOW WE DELIVER SAFE, HIGH-QUALITY PRODUCTS

We are each accountable for ensuring high-quality products and safety, no matter where we work at Oshkosh. This means we:

• design all our products for safe operation, meeting government regulations and industry standards
• have our Product Safety team assess designs and product support materials before a product launches
• work with customers in the field, learn their exact needs, see how our products perform and continually seek to improve them
• use a Quality Management System (QMS) that utilizes a “prevent, control and correct” method to ensure customer satisfaction
• apply Advanced Product Quality Planning to proactively identify potential problems and address them before a product launches
• engage Corrective Action Review Boards at each business segment to identify and systematically address any issues

DEALING AND COMPETING FAIRLY AND HONESTLY

WHY WE DEAL AND COMPETE FAIRLY AND HONESTLY

We have been true to our ethical roots since our founding. We believe fair and honest dealings and competition are good for the marketplace and for our business. Our customers expect us to compete honestly and fairly in all our business dealings. By making sure our business conduct is truthful and forthright, we build trust and reinforce our reputation as a company with integrity.

HOW WE DEAL AND COMPETE FAIRLY AND HONESTLY

At Oshkosh we ensure fair dealing and honest competition by:

• always seeking to do the right thing and delivering on our promises
• avoiding even the appearance of improper agreements with competitors
• not discussing or making agreements with competitors about any of the following:
  • not boycotting specific suppliers or customers
  • not limiting production or sale of products to drive up prices
  • never making false claims about a competitor’s products
• never sharing details about our bids and quotes with outsiders or accepting details about competitor bids from customers or other sources
• making sure all our sales and marketing practices are truthful, forthright and fully substantiated
• complying with legal requirements when choosing contracting with our suppliers
• seeking to do the right thing in all business dealings

Worth Resources

• Brand Manual
• GPPC Manual
• Procurement Integrity Policy

VALUES IN ACTION

Q: As I took my seat for a panel discussion at this year’s WasteExpo, I struck up a conversation with the woman sitting next to me, a sales director with a competitor. The conversation turned to procurement, and the woman mentioned how the purchasing agent in one municipality is particularly hard to deal with. Then she started talking about what would happen if nobody sold to this municipality anymore. How should I have responded?
A: Excuse yourself from the conversation immediately, and report your concern. Trade shows and association meetings are important ways to learn and stay current in our industry. However, interactions with competitors can be fraught with the risk of competition law violations. In this situation, the conversation could be seen as an attempt to form an agreement to exclude companies from a certain market or to put pressure on a certain customer to “fall in line.”
WHY WE GATHER COMPETITIVE INTELLIGENCE RESPONSIBLY

In our dynamic and challenging global marketplace, it is essential that we have a clear idea of what our competitors are offering and pursuing. But if that information is not available through ethical means and public sources, we will not pursue it. We compete vigorously but also with integrity, honesty and respect. No competitive advantage is worth violating our core values or the law.

HOW WE GATHER COMPETITIVE INTELLIGENCE RESPONSIBLY

We gather competitive intelligence responsibly, ethically and consistent with our values by:

• seeking information through public sources, such as newspapers, industry surveys, annual reports, observations of public property and publicly accessible Internet sites
• never paying for nonpublic information or using deception to obtain it
• not seeking competitor information from job applicants or team members who worked for competitors
• protecting the confidential and proprietary information of customers and suppliers

WHY WE ARE COMMITTED TO SERVING GOVERNMENTS

We consider it a privilege to work closely with national, regional and local governments and provide them with high-quality, cutting-edge, and reliable vehicles and equipment. We make a point of knowing the complex rules of working with governments, and we are highly protective of any classified information. We realize serving government customers actually means serving the people of our communities, and we take our responsibility of solid citizenship seriously.

HOW WE ARE COMMITTED TO SERVING GOVERNMENTS

Oshkosh’s commitment to serving governments means we:

• familiarize ourselves with the laws, customs and business practices of governments with which we do business
• comply with the Federal Acquisition Regulation (FAR), Defense Federal Acquisition Regulation Supplement (DFARS), International Traffic in Arms Regulations (ITAR) in the United States and other regulations in countries where we do business
• stay mindful of information that is classified or has other special restrictions and reach out to Defense Legal Counsel and/or Defense Security, if necessary
• do not seek or obtain “contractor bid or proposal information” or “source selection information” during procurement, under the U.S. Procurement Integrity Act
• avoid receipt of all unauthorized information about competitors
• ensure that all proposals, quotes, invoices, test reports or other certifications, communications and representations to customers are accurate and truthful
• use current, accurate and certified cost or pricing data when submitting proposals, under the Truth in Negotiations Act (TINA)
• follow all rules when hiring or working with current or former government team members

MORE RESOURCES

• GPSC Manual
• Procurement Integrity Policy

VALUES IN ACTION

Q: I know a talented government employee who is about to retire. Can I talk to her about working for us?
A: Not yet. Among other rules, U.S. law prohibits us from speaking to government team members for one year after they were last involved in anything related to our contracting work. Always contact Legal Counsel before starting any type of job discussions with a current or former government employee.
DOING GLOBAL BUSINESS RESPONSIBLY

WHY WE DO GLOBAL BUSINESS RESPONSIBLY
We take ownership of our responsibility to know and abide by the laws and regulations in the countries we operate. We recognize it is a privilege to have our products and equipment used around the world and we take that privilege seriously. Our customers would expect nothing less.

HOW WE DO GLOBAL BUSINESS RESPONSIBLY
This means we:

• Accurately classify and value imported and exported goods so we pay appropriate duties
• Maintain current information on sanctions through our Global Trade Compliance Group
• Keep track of global lists of individuals, groups and organizations that are designated as terrorists, supporters of terrorism, drug traffickers or “end users” who may be involved in dangerous weapon development
• Adhere to United States anti-boycott laws at all times
• We do not participate in international boycotts not sanctioned by the United States.
• We are watchful for signs of anti-Israeli boycotts in letters of credit, contracts, requests for tenders, shipping details and other documents.

VALUES IN ACTION
Q: One of our customers told me she will not accept products with any parts made in a certain country. How should I respond?
A: Tell her you cannot take part in that discussion. Even if we don’t participate in boycott activity, the request itself may be reportable. Report the conversation to the Global Export Controls Shared Services Group for advice on how to proceed.

Trade regulations can be extremely complicated, and are constantly changing. If you have any questions or concerns, contact the Global Export Controls Shared Services Group before proceeding.

VALUES IN ACTION

MORE RESOURCES
• ITAR/EAR Policies & Procedures
• FAQ
• Foreign Visitor Policy
**AVOIDING CONFLICTS OF INTEREST**

**WHY WE AVOID CONFLICTS OF INTEREST**

We expect to be judged on our merits, and we give that same respect to our suppliers, business partners and each other. If our judgment is compromised by personal interests or priorities, we cannot reach our full potential as One Oshkosh. We would also undermine shareholder value and our reputation. But when we act with integrity, honesty and respect, we know where we stand—and so do our stakeholders.

**HOW WE AVOID CONFLICTS OF INTEREST**

We avoid even the appearance of conflicts of interest in all areas of business when we:

- disclose potential personal conflicts, or those of our colleagues, to the General Counsel or the Global Ethics & Compliance Group
- address actual or perceived conflicts promptly
- make a disclosure, remove ourselves from the process of deciding how to handle the situation, and support whatever decision is made by the General Counsel or the Global Ethics & Compliance Group

Personal interests could conflict with the Company’s in several areas, including:

**RELATIVES AND FRIENDS**

We understand that the desire to help our close family and friends could cloud our judgment, and we take ourselves out of business decisions involving them.

- We will not place close friends, romantic partners or family members into direct reporting relationships.
- We remove ourselves from hiring decisions involving them.
- We disclose when they work with our suppliers, contractors, customers or competitors.

**PERSONAL OR FAMILY FINANCIAL INTERESTS**

We make decisions that are not influenced by the prospect of financial gain for ourselves or our family members.

- We do not own a substantial stake in entities that do business with or compete against Oshkosh (contact the Global Ethics & Compliance Group for a definition of “substantial”).
- We disclose when our close family members have a substantial interest in or are employed by an entity that does business with or competes against Oshkosh.

**CORPORATE OPPORTUNITIES**

We use the knowledge we have gained as Oshkosh team members, as well as the Company’s resources and assets, only for the benefit of Oshkosh.

- We avoid using Oshkosh property, information or position for outside financial gain.
- We prevent outside activities from affecting our job performance at Oshkosh.

We refuse to compete directly or indirectly with Oshkosh.

**GIFTS AND ENTERTAINMENT**

We make it clear that our business decisions are based solely on merit, not the improper giving or receiving of gifts, entertainment or anything else of value.

- We never want it to seem like our business decisions were influenced by gifts, entertainment, hospitality or favors. We earn the trust of customers and business partners by treating them with honesty, integrity and respect. Oshkosh strictly prohibits offering, seeking or receiving any type of bribe or kickback, whether it involves public or private entities.
- To avoid potential conflicts involving the giving of gifts and entertainment, we:
  - only provide reasonable meals and entertainment as part of business discussions and only if they do not violate policies of the recipient’s organization
  - will not give gifts of more than nominal value to any entity with which we do business or seek to do business

- use good judgment to ensure anything we give cannot be interpreted as an improper attempt to influence business decisions or to obligate someone
- properly document and record all expenditures for meals, entertainment and gifts
- do not give or offer anything of value to government personnel without being approved in advance by Legal

We report any improper offers from suppliers to the Global Ethics & Compliance Group.

- will not accept cash or cash equivalent (e.g., gift cards, stored value cards or gift certificates)
- laws and cultural norms on giving gifts and entertainment differ. Consult the Global Ethics & Compliance Group if you have questions, and turn over any improper gifts to them.

If you believe you are facing an actual or potential conflict of interest, disclose it to the General Counsel or the Global Ethics & Compliance Group. Written approval from the General Counsel or Vice President of Ethics & Compliance is required for involvement in any interests that might conflict with those of the Company.

**VALUES IN ACTION**

**Q:** One of our suppliers sent a gift basket of fruit to the office. Can I accept the gift basket?

**A:** Yes, you should put it out in the office for everyone to enjoy.

**MORE RESOURCES**

- Conflicts of Interest Policy
- Gifts and Entertainment Policy
- Anti-Bribery & Anti-Corruption Policy

"NOMINAL" VALUE MEANS ANYTHING THAT IS NOT LAWSH OR FREQUENT. IN GENERAL, WE CANNOT GIVE OR RECEIVE BUSINESS GIFTS OR ENTERTAINMENT WORTH A MARKET VALUE OF US $100 OR MORE.
CREATING, MAINTAINING AND DISCLOSING ACCURATE RECORDS AND ACCOUNTS

WHY WE MAINTAIN ACCURATE RECORDS

We count on accurate, complete, accessible business records to make essential decisions. Proper records management improves overall efficiency and productivity, safeguards the organization’s vital information and ensures regulatory compliance. It also provides transparency to investors and protects us from litigation, fines and criminal proceedings.

HOW WE MAINTAIN ACCURATE RECORDS

We create, protect and dispose of our records with honesty, integrity and accountability. This means we:

• accurately reflect all transactions in our accounting records, including vouchers, bills, invoices, expense reports and payroll records
• record all assets, liabilities, revenues and expenses in a timely manner, according to regulations, generally accepted accounting principles and Company policy
• store and dispose of records securely, according to our records management policies
• protect any records that may relate to legal proceedings.

VALUES IN ACTION

Q: I know our records management policies call for us to delete certain records after a designated amount of time, but I’ve been keeping all my records just in case someone needs them somewhere down the line. Is that okay?

A: No, you must do everything possible to adhere to our records retention schedules. Keeping records for too long can overtax our storage systems and put sensitive or confidential information at risk of being accessed and misused. By retaining records according to schedule, you strengthen our records management program and protect the Company.

WHY WE COMMUNICATE RESPONSIBLY TO THE PUBLIC

We must provide clear, accurate and consistent information about Oshkosh to investors and the public. At the same time, we must protect our sensitive or proprietary information, as well as that of our suppliers and customers. We can meet these obligations if we ensure that external inquiries are addressed only by colleagues with the authority and experience to handle them.

HOW WE COMMUNICATE RESPONSIBLY TO THE PUBLIC

We respond to all inquiries with integrity and good citizenship. This means we:

• are courteous but firm in not providing any information about Oshkosh, our partners or our customers unless we are specifically authorized to do so
• refer media inquiries to Corporate Communications and analyst or investor inquiries to Investor Relations
• follow all Oshkosh policies about protecting confidential information

For more information about responding to inquiries from the media, investors or other outside sources, contact Corporate Communications or Investor Relations.

VALUES IN ACTION

Q: One of our suppliers asked me if we were feeling positive about our chances of getting the contract for a big order of rear-discharge mixers. She wants to know so she can start ramping up production, which would help us deliver on time, too. What should I say?

A: Even though this is a trusted business partner with a legitimate reason to know the information, you cannot share it yourself. Do not even drop hints, let alone offer tips, as it would put you and the Company at risk of insider trading violations. Refer the supplier to her purchasing representative. They have the resources to determine if this partner should know the information and how to best respond while maintaining a good business relationship.

<< RISKY INFORMATION REQUESTS CHECKLIST >>

Improper requests for information could come at any time, from a variety of sources. Beware of answering requests about:

• Product development or shipments
• Customer names or other customer data
• Suppliers
• Employees
• Pricing or costs
• Lead times
• Quality levels
• Overall business trends

MORE RESOURCES

• Records and Information Management (RIM) Manual
• CAPP Manual

Table of Contents
SAFEGUARDING OUR ASSETS AND INFORMATION

WHY WE PROTECT COMPANY ASSETS
We all help to create the assets that Oshkosh relies on every day. From patented processes, to advanced equipment, to Oshkosh’s reputation, these assets benefit all of us and the Company’s investors. They directly affect our ability to succeed as individuals and as One Team. Therefore, we are each accountable for safeguarding them against damage, loss, theft and mistreatment. We embrace our responsibility to treat these assets as we would our own—because, in a sense, they are.

HOW WE PROTECT COMPANY ASSETS
We safeguard all Company resources and information. This means we:
• use Oshkosh assets only for business purposes and report when they are at risk
• prevent loss, waste, destruction, theft and abuse of Company resources
• protect assets of our suppliers and customers as well as our own property, facilities and equipment
• prevent disclosure of confidential information or trade secrets
• do not lend, borrow, sell or dispose of Company assets without authorization
• practice cost-consciousness, always balancing quality and price when acquiring materials and services and only seeking reimbursement for reasonable business-related expenses
• obtain NonDisclosure Agreement and properly mark confidential information when necessary to share

MORE RESOURCES
• CAPP Manual
• TINA

“ASSETS” CAN REFERENCE MANY THINGS. THERE ARE:
• Information assets, such as any data related to Oshkosh’s business
• Financial assets, such as money, financial instruments, or anything that can be converted into money (including time)
• Physical assets provided to team members to conduct business, such as phones, tools, machinery, buildings, vehicles and office supplies
• Intangible assets, such as ideas, inventions, copyrights, patents, trade secrets and our reputation

CONFIDENTIAL AND PROPRIETARY INFORMATION
We carefully protect Oshkosh’s proprietary and confidential information, understanding it is vital to our growth, competitive advantage and value to shareholders. Our proprietary information is a critical business asset. We are each a steward and trusted business partner of that asset. We honor that trust by protecting Company data. The Oshkosh Way: This means we:
• identify confidential information, store it securely and protect it from unauthorized access
• share confidential information only if there’s a business need-to-know even among team members
• respond rapidly to new security imperatives and remain alert to the security implications of everything we do
• continue to protect Oshkosh’s information even if we leave the Company
• hold ourselves accountable as data owners for properly classifying all documents (including e-mails), according to these guidelines:
  - Unrestricted—Unauthorized disclosure would cause no damage to the Company. Anyone outside the Company can see it.
  - Restricted—Unauthorized disclosure would cause damage to the Company. With a business need and authorization, can be shared within the Company, as well as with its suppliers and business partners.
  - Highly Restricted—Unauthorized disclosure would cause serious damage to the Company. With a business need and authorization, can be shared within a small subset of Company personnel and business partners.

MORE RESOURCES
• CAPP Manual
• Record Retention Manual
• Corporate Transactions Authorization and Notification Matrix
• Classification and Handling of Confidential & Proprietary Information Policy
• Acceptable Use Policy

INTERNAL CONTROLS
We follow and facilitate all of Oshkosh’s internal controls, knowing this protects our assets and correctly accounts for them. This means we:
• design, use and maintain internal controls that protect our assets and ensure accurate financial reporting
• understand and comply with Company policies and procedures regarding the creation and storage of timely, accurate and complete records
• fully cooperate with auditors and any internal investigations
• comply with the Sarbanes-Oxley Act, the Foreign corrupt Practices Act (FCPA), and other applicable laws and regulations

MORE RESOURCES
• CAPP Manual
• Record Retention Manual
• Corporate Transaction Authorization and Notification Matrix
• Classification and Handling of Confidential & Proprietary Information Policy
• Acceptable Use Policy

“CONFIDENTIAL INFORMATION” COULD BE:
• Nonpublic financial information or projections
• Marketing plans
• Proprietary processes, formulas or product designs
• Pending patents and trade secrets
• Research and development plans
• Salary data and employee information
• Acquisition and divestiture plans
• Procurement details
• Pricing strategies
• Detailed pricing and cost data
• Supplier lists and information
• Customer lists and information

MORE RESOURCES
• Social Media Policy
• Acceptable Use Policy

INSIDER TRADING
We do not use or share inside information if it creates a risk or even the appearance of illegal securities trading. We respect shareholders and the integrity of financial markets. Insider trading can distort markets, damage reputations, elicit fines or even lead to prison time. So, we take accountability for preventing improper disclosure of inside (or material, nonpublic) information. This means we:
• comply with all insider trading laws and regulations
• do not buy or sell securities or tip others off when we have access to inside information
• share inside information only with authorized team members on a need-to-know basis
• give the public a chance to digest inside information once it is released before we make any trades

MORE RESOURCES
• Insider Trading Policy

MATERIAL, NONPUBLIC (“INSIDE”) INFORMATION
is information about any company that has not been made publicly available and that a reasonable investor would consider important when deciding to trade securities. It can include:
• Financial results and dividends
• New contract awards
• Lawsuits, settlements or pending litigation
• New products or marketing initiatives
• Changes in upper management
• Anticipated mergers or acquisitions
• do not use unauthorized software or applications on Company equipment
• are professional and courteous on all Oshkosh communications systems, avoiding content that is obscene, inappropriate, hurtful, slanderous, illegal or inaccurate
• do not share passwords or other access controls or store them improperly
• limit personal use of Oshkosh equipment and systems, ensuring it is incidental and does not interfere with our job performance
• understand we do not have a right to privacy when using Company equipment or systems and realize they might be inspected at any time

MORE RESOURCES
• Social Media Policy
• Acceptable Use Policy
06

COLLABORATING WITH BUSINESS PARTNERS

We strive for mutually beneficial partnerships with our suppliers, contractors and distributors. We go the extra mile to find partners who share our core values of integrity, honesty and citizenship. We actively fight against corruption and refuse to look the other way when it comes to protecting the property, rights and dignity of others.

OUR COMMITMENT TO BUSINESS PARTNERS

We are committed to fair dealing and mutually satisfying business relationships based on trust, transparency and cooperation.

WHY WE BUILD STRONG PARTNERSHIPS

Building cutting-edge specialty vehicles and equipment involves buying large numbers of components and subsystems from suppliers. Likewise, selling this equipment to governments and other customers worldwide often requires help from contractors, consultants, dealers, independent sales representatives, distributors and other business partners. We consider these third parties to be part of our team as One Oshkosh. Thus, we expect them all to adhere to The Oshkosh Way. We need their products and services to meet our own high standards of safety, value and integrity. Our customers are depending on it.

HOW WE BUILD STRONG RELATIONSHIPS

We select our business partners through a rigorous but fair competitive process. This means we:

- base procurement on clear, specific performance requirements and measurable results
- give all qualified prospective partners an equal opportunity to earn contracts
- seek to procure high-quality, safe products delivered on time and on budget
- practice cost-consciousness and verify we did not pay more than fair market value
- expect our business partners to engage in fair dealings with us just as we commit to engage in the same way with them
- conduct due diligence on third parties to ensure they are qualified and reputable
- formalize relationships in writing so all transactions are transparent
- comply with the U.S. Procurement Integrity Act, the FCPA and other applicable laws

MORE RESOURCES

- Supplier Code of Conduct
PREVENTING BRIBERY AND CORRUPTION

WHY WE PREVENT BRIBERY AND CORRUPTION

We earn the trust of customers for the long term by relying on our team members and our innovative, high-quality products. We do not engage in bribery or other corrupt practices, no matter where we operate or how others might do things. We consider this not just a legal but also a moral obligation. Corruption robs our communities by destroying trust, undermining the law, damaging human rights and distorting markets. Our core values of honesty, integrity and citizenship compel us to fight corruption. By holding ourselves accountable to these values, we make our business and our communities stronger and more sustainable.

HOW WE PREVENT BRIBERY AND CORRUPTION

Oshkosh takes a stand against corruption and only pursues business ethically. This means we:

- do not offer, promise, demand or give anything of value to a public official or anyone else to gain an improper advantage
- will not accept bribes, kickbacks or inappropriate gifts
- report any indication of an improper payment
- comply with the Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act and the laws of countries in which we do business
- perform due diligence to ensure our representatives and agents share our commitment to fighting corruption
- engage third parties only when necessary and only if they have the right experience, work for a reasonable fee and adhere to our core values

MORE RESOURCES

- Anti-Bribery & Anti-Corruption Policy
- Gifts and Entertainment Policy
- Corruption Red Flags

VALUES IN ACTION

Q: We are looking to open a new distribution facility in an emerging market, but permits for construction have been held up. I contacted the local inspector, and he told me the permits can be expedited if I did him a favor. What should I do?

A: The inspector is asking for what amounts to bribe. Doing a favor for the local inspector to receive the permit is against our policies and the law.

PROTECTING OTHERS’ CONFIDENTIAL INFORMATION

WHY WE PROTECT OTHERS’ CONFIDENTIAL INFORMATION

At times, our partners and customers must share their confidential information with us. A supplier may need to share plans for a new part or a customer may have to reveal classified military information. When others entrust sensitive details to us, they are putting their hard work, research, hopes, assets and sometimes even lives on the line. We have a duty to honor that trust by accepting accountability for protecting that information.

HOW WE PROTECT OTHERS’ CONFIDENTIAL INFORMATION

We strive to safeguard others’ confidential information from misuse. This means we:

- do not request confidential information unless it is completely necessary
- ensure disclosures are made under a valid Confidential Information Nondisclosure Agreement
- make sure the information is clearly labeled and not shared with anyone inside or outside our Company without authorization and a legitimate need to know
- use the same security measures we employ with our own confidential information, including encryption, passwords and access controls
- do not use confidential information we’re not meant to see—even about a competitor
- return confidential information if we suspect it was shared by mistake and contact the Legal Department

MORE RESOURCES

- Classification and Handling of Confidential & Privileged Information Policy
- OPSC Manual
RESPECTING THE INTELLECTUAL PROPERTY OF OTHERS

WHY WE RESPECT OTHERS’ INTELLECTUAL PROPERTY
Given the business value of our own ideas, processes and other intellectual property (and the effort we put into creating and protecting them), we must equally respect the intellectual property of others.

HOW WE RESPECT OTHERS’ INTELLECTUAL PROPERTY
We respect the intellectual property rights of others, including our competitors. This means we:
• obtain all necessary authorizations and licensing agreements before using intellectual property and follow all terms of use
• properly use trademarks, copyrights, logos, names and designs in our advertising and marketing materials
• respect others’ patent rights, trade secrets and proprietary information, including during our research and development process
• stay vigilant about recognizing and reporting counterfeit products, pirating and other intellectual property crimes

Contact the Legal Department or the Global Ethics & Compliance Group with questions.

MORE RESOURCES
• CAPP Manual

VALUES IN ACTION
Q: I worked for a competitor of Oshkosh, and I have extensive knowledge of its patented electronics system. Can I use this information now?
A: If you’re talking about something that is general, publicly known and not specific to the patented system, you may be able to use it. However, you could also end up violating intellectual property laws, which, along with being unethical, could also lead to civil or criminal prosecution. Check with the Legal Department before proceeding.

WHY WE RESPECT AND PROTECT HUMAN RIGHTS
With operations around the globe, we can bring meaningful change to the world. By engaging only with business partners who respect human rights, we help team members with high ethical standards continue to succeed. We refuse to engage in child labor, forced labor, slavery, human trafficking and unsafe working conditions. We honor our core values, enhance our reputation and demonstrate what we mean when we say we’re all part of One Team, One Oshkosh.

HOW WE RESPECT AND PROTECT HUMAN RIGHTS
We are vigilant to protect the rights of workers at our own facilities as well as of those employed by our suppliers and business partners. This means we:
• perform due diligence in seeking out suppliers and business partners who do not violate human rights
• expect partners to demonstrate high ethical standards
• instruct suppliers not to purchase conflict minerals

Report any concerns that a business partner may be acting unethically to the Legal Department or the Global Ethics & Compliance Group, regardless of whether there is an imminent risk to Oshkosh’s business or reputation.

MORE RESOURCES
• Supplier Code of Conduct
• Human Rights Policy
• Conflict Minerals Policy

VALUES IN ACTION
Q: During a visit to a manufacturing site for one of our suppliers, I noticed a few workers who seemed to be underage. My host assured me that they are older than they look. What should I do?
A: You should bring up your concerns with the Global Ethics & Compliance Group, so they can investigate.
07 CONTRIBUTING TO COMMUNITIES

We are respectful neighbors and supportive citizens. We are engaged partners who listen to concerns and seek out safe, sustainable solutions. As a global company, we see both the opportunity and the responsibility to bring real positive change to the world.

OUR COMMITMENT TO COMMUNITIES

We are committed to being responsible neighbors and demonstrating good citizenship.

PROTECTING THE ENVIRONMENT

We promote environmental accountability and stewardship at all times. This means we:
- familiarize ourselves with and follow all environmental laws, policies and procedures that apply to us
- meet or exceed the requirements of environmental permits
- take personal responsibility for helping to reduce waste and emissions
- seek opportunities to conserve energy in our facilities, processes and vehicles
- safely dispose of hazardous waste
- employ an Environmental Compliance Assessment Program (eCAP) at our facilities
- recondition our machinery, vehicles and equipment to save raw materials
- report any environmental incident or risk of incident to the Environmental Affairs Department

MORE RESOURCES
- Environmental Protection Policy
- Energy Management Policy
- Corporate Safety Policy
- Corporate Sustainability Report
- Supplier Code of Conduct
WHY WE SUPPORT OUR COMMUNITIES

Oshkosh is a global company operating locally. We delight customers around the world largely because of the talent we attract and the support we receive from the communities where we operate. We don’t take our communities for granted. We look for opportunities to contribute to their growth and success. Giving back and helping others reach their fullest potential is a vital part of The Oshkosh Way.

HOW WE SUPPORT OUR COMMUNITIES

We look for ways to create opportunities for others and contribute to a better quality of life. This means we:

• encourage volunteering, mentoring, career development and charity work
• share Company resources if we have prior authorization
• verify that any charity we become involved with is legitimate
• do not seek or receive favors in return for charitable contributions or pressure others to make contributions

WHY WE PARTICIPATE IN THE POLITICAL PROCESS

RESPONSIBLY

We each have the right to take part in civic affairs and join political campaigns. But we must clearly separate our personal political involvement from Oshkosh. Otherwise, our activities could reflect negatively on Oshkosh, be misconstrued as having Company support or worse, appear to be illegal lobbying activities. Since Oshkosh works directly with governments every day, we must be precise and vigilant about engaging in politics legally and ethically or else we risk undermining the trust of our customers and communities and exposing ourselves to additional risk.

HOW WE PARTICIPATE IN THE POLITICAL PROCESS

RESPONSIBLY

We engage in the political process carefully as private citizens and transparently as a company. This means we:

• disclose our relationship with Oshkosh when we take political action as individuals and make it clear that the opinions we express are our own
• participate in politics only on our own behalf and at our own expense
• do not contact lawmakers or government employees to influence the awarding of a contract to Oshkosh
• contact the Executive Vice President of Government Operations before speaking with any lawmaker about bills affecting Oshkosh
• do not use Oshkosh’s name to promote a party, candidate or cause without authorization
• know which activities could be seen as lobbying and meet all reporting and other legal requirements when we lobby as authorized Oshkosh team members
• do not make any political contribution on behalf of Oshkosh without advance approval from the Legal Department

Oshkosh has a political action committee through which team members can support political causes that directly impact our Company, products or industry. Participation with the Oshkosh Corporation Employee Political Action Committee (OCEPAC) is completely voluntary and closely regulated by the Federal Election Commission. (This paragraph is not a solicitation for donations to the OCEPAC.)

MORE RESOURCES

• Acceptable Use Policy
**MAKING DECISIONS THE RIGHT WAY**

We face many choices every day. Some are simple. Others are more complex. It’s often beneficial to have a framework that helps us step back and ensure you are conducting business *The Oshkosh Way*.

**HOW TO MAKE DECISIONS THE RIGHT WAY**

**ANSWER THESE 4 QUESTIONS BEFORE YOU ACT:**

1. Is it Legal?
2. Is it consistent with our Company policies?
3. Is it consistent with each of our Core Values: Honesty, Integrity, Accountability, Respect and Citizenship?
4. Would you be proud if it is on the front page of the newspaper for your family, friends and colleagues to read?

If any of the answers to these questions is “No,” do not proceed without discussing with your Supervisor or the Global Ethics & Compliance Group.

**UPHOLDING THE OSHKOSH WAY**

We reward actions that uphold *The Oshkosh Way* because these reflect and reinforce the values-based culture that is so important to us. When an investigation determines that a violation of *The Oshkosh Way* or an underlying policy has occurred, appropriate discipline will follow. Discipline can consist of many actions, including termination, reimbursement of losses or damages to Oshkosh, or even referral for criminal prosecution.
GLOBAL ETHICS AND COMPLIANCE
Bettye J. Hill
Vice President, Chief Ethics & Compliance Officer
bhill@oshkoshcorp.com
Amy Thiel
Director, Global Ethics & Compliance
athiel@oshkoshcorp.com
Steve Kroloff
Director, Global Investigations
skroloff@oshkoshcorp.com
Chad Kleist
Global Communication and Training Manager
ckleist@oshkoshcorp.com

HELPLINE WEBSITE
www.tnwinc.com/reportline/Oshkosh

HELPLINE NUMBER (U.S. & CANADA)
1-866-554-3844

OSHKOSH CORPORATION GLOBAL ETHICS
AND COMPLIANCE WEBSITE
http://www.oshkoshcorporation.com/about/global-ethics-compliance.html

*Also contact your local Human Resources department.