TRANSPARENCY INTERNATIONAL
Defence & Security

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

OSHKOSH CORPORATION, INC.

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	7/8
2. Internal Controls	6	5/12
3. Support to Employees	7	6/14
4. Conflict of Interest	4	5/8
5. Customer Engagement	7	3/14
6. Supply Chain Management	5	3/10
7. Agents, Intermediaries and Joint Ventures	10	2/20
8. Offsets	4	0/8
9. High Risk Markets	4	5/8
10. State-Owned Enterprises	N/A	N/A
TOTAL		**36/102**
BAND		**D**

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

Question
1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?
Score
1
Comments
The company's Code of Conduct details the company's stance against bribery and corruption. It is clear that the Code of Conduct was authorised and endorsed by the company's leadership. However, the company's leadership does not specifically mention anti-bribery and corruption and therefore a score of '1' applies.
Evidence
[3] Code of Conduct (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.5] 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.   WILSON JONES President and Chief Executive Officer [p.34] 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

[1] Ethics – Our Story (Webpage)
Accessed 29/08/2019
https://www.oshkoshcorp.com/story/ethics
Ethics & values

For Oshkosh, acting ethically involves a lot more than simply following the rules. We constantly strive to go beyond by living the Oshkosh Way and demonstrating the values we live by at every level of the organization. After all, doing the right thing is at the core of our purpose—making a difference in the lives of the team members, customers, shareholders and communities that count on us.

WE PUT PEOPLE FIRST.
WE DO THE RIGHT THING.
WE PERSEVERE.
WE ARE BETTER TOGETHER.

Question
1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories: **a) All employees, including staff and leadership of subsidiaries and other controlled entities;** **b) All board members, including non-executive directors.**
Score
2
Comments
The company publishes an explicit anti-bribery and corruption policy which makes specific reference to the prohibition of bribery of all types, payments to public officials and facilitation payments. This policy clearly applies to all employees and board members.
Evidence
[2] Anti-Bribery Policy (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Anti-Bribery%20%20Anti-Corruption%20Compliance%20English.pdf?la=en&hash=7110CA1F074FA3BE9E61515886FB5973D524D5A8 [p.1] SCOPE This policy applies globally to all employees, officers and directors of the Company and any third party acting on the Company's behalf. All Company employees should always be familiar with and observe the requirements of this policy. Failure to follow this policy will subject an employee to disciplinary actions up to and including termination. POLICY Oshkosh Corporation has a zero-tolerance approach towards bribery and corruption and requires all Company employees, officers and directors and any third party acting on behalf of the Company to comply fully with applicable anti-bribery and anti-corruption laws and regulations. These laws and regulations include the U.S Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA) and anti-bribery laws and regulations of other countries in which the Company does or intends to do business, regardless of local practices, customs or competitive conditions. Bribes, Kickbacks and Other Corrupt Payments Company employees are prohibited from directly or indirectly offering, giving, soliciting or receiving improper payments, gifts or inducements of any kind to and received from any person or organization. The following concepts are essential to understanding the scope of this prohibition: • Corruption – Obtain or attempt to obtain a personal benefit or business advantage through [p.2] improper or illegal means. Corruption includes activities such as bribery, extortion and kickbacks. • Bribery – Offer to give or receive anything of value with the intent to corruptly influence a person's actions or decisions to gain any business or other improper advantage. Anything of value includes tangible or intangible benefits such as cash, entertainment, charitable contributions, or other gifts or courtesies. • Extortion – Obtain money or some other thing of value by the abuse of one's office or authority. • Kickback – Two parties agree that a portion of sales or profits will be improperly given, rebated or kicked back to the purchaser in exchange for making the deal. • Directly or indirectly – if you are prohibited from making any payment, gift, offer or promise directly, you are also prohibited from making it indirectly. You may not instruct, authorize or allow a third party to make a prohibited payment on your behalf, and you may not make a payment to a third party knowing or having reason to know that it will likely be given improperly.

Facilitation Payments:

Our Company prohibits facilitation or 'grease' payments as these are bribes and illegal. Facilitation or 'grease' payments are small payments to secure or speed up routine actions, usually by public officials. Examples of routine actions are issuing permits, licenses or other official documents; obtaining visas and work orders; providing services such as police protection, obtaining mail, or scheduling inspections; or expediting or releasing goods held in customs. This prohibition applies to employees and third parties acting on the Company's behalf. If you are unsure whether a payment would be considered a facilitation payment, only make the payment if the official or third party can provide a formal receipt of written confirmation of its legality. If you are making a payment because you are in fear for the health, safety or welfare of yourself or another employee, this is an extortion payment. Make the payment and notify your manager; the Vice President and Chief Ethics, Compliance and Sustainability Officer; and the General Counsel as soon as you are able. Such payments must be accurately accounted for in the Company's books and records.

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9
[p.34] PREVENTING BRIBERY AND CORRUPTION

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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.

[12] Code of Ethics for Directors and Senior Executives (Document)
Accessed 26/02/2020
https://s24.q4cdn.com/975203404/files/doc_downloads/policies/updated/Oshkosh-Code-of-Ethics-for-Directors-and-Senior-Executives.pdf
[p.1] It is critical to the success of Oshkosh Corporation (the "Company") and in the best interests of its shareholders that its employees and directors conduct themselves honestly and ethically. In particular, each director of the Company and each member of the Company's senior executive management team, including the

Chief Executive Officer, the Chief Operating Officer, the Chief Financial Officer, the Chief Accounting Officer, the Treasurer, the General Counsel, the Corporate Accounting Manager, and the Presidents, Vice Presidents of Finance and Controllers of the Company's business units, or persons holding positions with similar responsibilities at a business unit, and other officers elected by the Board of Directors of the Company at the vice president level or higher (collectively, the "Executive Team"), are required to observe the highest standards of ethical business conduct, including strict adherence to this Code of Ethics Applicable to Directors and Senior Executives and, in the case of members of the Company's senior executive management team, the Company's Code of Ethics/Standards of Conduct applicable to all employees.

[p.3] X. Any member of the Executive Team who violates the provisions of this Code, including by engaging in unethical conduct, failing to report conduct violative or potentially violative of this Code or refusing to participate in good faith in any investigation of such conduct, shall be subject to disciplinary action up to and including termination of service with the Company.

Question
1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?
Score
2
Comments
There is evidence that the Audit Committee of the board of directors provides oversight of the company's anti-bribery and corruption programme. This includes reviewing reports from management on the programme's performance, and there is evidence that the designated board committee has the authority to require that changes are made.
Evidence
[1] Ethics – Our Story (Webpage) Accessed 29/08/2019 https://www.oshkoshcorp.com/story/ethics GLOBAL ETHICS AND COMPLIANCE PROGRAM Oshkosh established the Global Ethics & Compliance Program to provide team members with the resources needed to make ethical decisions and act with integrity. The mission of the program is to educate and engage team members while implementing compliance controls to support our People First culture. It reflects our commitment to conducting business in accordance with the highest ethical standards and in compliance with applicable laws and regulations. The program is overseen by our Vice President and Chief Ethics and Compliance Officer who reports to our General Counsel as well as to the Audit Committee of the Oshkosh board of Directors. The Global Ethics and Compliance Advisory committee, led by senior leaders from across the globe, also provides guidance and oversight. **[4] Audit Committee Charter (Document)** Accessed 29/08/2019 https://s24.q4cdn.com/975203404/files/doc_downloads/committee_description/Oshkosh-Board-of-Directors-Audit-Committee-Charter.pdf [p.1] Purpose The purpose of the Audit Committee of the Board of Directors ("Audit Committee") shall include assisting the Company's Board of Directors in oversight of (a) the integrity of the Company's financial statements and effectiveness of the Company's system of internal control over financial reporting and disclosure controls and procedures, (b) the Company's compliance with legal and regulatory requirements, (c) the qualifications and independence of the independent registered public accounting firm, (d) the performance of the Company's internal audit function and independent registered public accounting firm, (e) the Company's business risk management process, and (f) the implementation and effectiveness of the Company's ethics and compliance program. In so doing, it is the responsibility of the Audit Committee to maintain free and open communication between and among the directors, the independent registered public accounting firm, the internal auditors, outside counsel and the financial and operating management of the Company. [p.2] Responsibilities [p.5] 9. Meet with the Company's Chief Ethics and Compliance Officer to review the implementation and effectiveness of the Company's ethics and compliance program. The Chief Ethics and Compliance Officer and, as to matters involving compliance with applicable laws and regulations, the Company's General Counsel shall have direct reporting authority to the Audit Committee, as appropriate. 10. Obtain, on a quarterly basis, reports on hotline calls and disposition of related matters. 11. Advise the Board of Directors with respect to the Company's ethics and compliance program and compliance with applicable laws and regulations.

Question
1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?
Score
2
Comments
There is evidence that a designated senior executive, the Vice President and Chief Ethics and Compliance Officer, has ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme. It is clear that this person has a direct reporting line to the Audit Committee. There is evidence of reporting and feedback activities between this person and the Audit Committee as part of the company's reporting structure.
Evidence

[1] Ethics – Our Story (Webpage)
Accessed 29/08/2019
https://www.oshkoshcorp.com/story/ethics
GLOBAL ETHICS AND COMPLIANCE PROGRAM

Oshkosh established the Global Ethics & Compliance Program to provide team members with the resources needed to make ethical decisions and act with integrity. The mission of the program is to educate and engage team members while implementing compliance controls to support our People First culture. It reflects our commitment to conducting business in accordance with the highest ethical standards and in compliance with applicable laws and regulations. The program is overseen by our Vice President and Chief Ethics and Compliance Officer who reports to our General Counsel as well as to the Audit Committee of the Oshkosh board of Directors. The Global Ethics and Compliance Advisory committee, led by senior leaders from across the globe, also provides guidance and oversight.

[4] Audit Committee Charter (Document)
Accessed 29/08/2019
https://s24.q4cdn.com/975203404/files/doc_downloads/committee_description/Oshkosh-Board-of-Directors-Audit-Committee-Charter.pdf
[p.1] Purpose

The purpose of the Audit Committee of the Board of Directors ("Audit Committee") shall include assisting the Company's Board of Directors in oversight of (a) the integrity of the Company's financial statements and effectiveness of the Company's system of internal control over financial reporting and disclosure controls and procedures, (b) the Company's compliance with legal and regulatory requirements, (c) the qualifications and independence of the independent registered public accounting firm, (d) the performance of the Company's internal audit function and independent registered public accounting firm, (e) the Company's business risk management process, and (f) the implementation and effectiveness of the Company's ethics and compliance program. In so doing, it is the responsibility of the Audit Committee to maintain free and open communication between and among the directors, the independent registered public accounting firm, the internal auditors, outside counsel and the financial and operating management of the Company.

[p.2] Responsibilities

[p.5] 9. Meet with the Company's Chief Ethics and Compliance Officer to review the implementation and effectiveness of the Company's ethics and compliance program. The Chief Ethics and Compliance Officer and, as to matters involving compliance with applicable laws and regulations, the Company's General Counsel shall have direct reporting authority to the Audit Committee, as appropriate.

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
1
Comments
There is evidence that the company has a formal bribery and corruption risk assessment procedure that informs the design of the anti-bribery and corruption programme. There is evidence that the results of risk assessments are reviewed at board level, and are used to develop tailored mitigation plans and to update specific parts of the company's anti-bribery and corruption programme. However, it is unclear whether risk assessments are reviewed at least annually or when they reveal significant findings.
Evidence
[4] Audit Committee Charter (Document) Accessed 29/08/2019 https://s24.q4cdn.com/975203404/files/doc_downloads/committee_description/Oshkosh-Board-of-Directors-Audit-Committee-Charter.pdf [p.2] Responsibilities [p.5] 9. Meet with the Company's Chief Ethics and Compliance Officer to review the implementation and effectiveness of the Company's ethics and compliance program. [...] 15. Evaluate and discuss the Company's overall guidelines, policies, processes and procedures with respect to risk assessment and risk management, including material risks that could [p.6] impact the Company's performance, operations and strategic plans. The Audit Committee's responsibility for risk management is one of oversight, and therefore, it is not responsible for the preparation of the Company's risk management program. The Company's management shall be responsible for assessing and managing the Company's exposure to risk. Additionally, similar to other Board of Directors committees, the Audit Committee shall oversee risk categories as assigned by the Board of Directors. Discussion of specific risk categories shall include the adequacy of the steps taken by the Company to monitor and control such exposures. **[17] 2018 Sustainability Report (Document)** Accessed 05/05/2020 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/impact/sustainability/Sust%20Report%20PDFs/2018_Sustainability%20Report.pdf?la=en&hash=9C05F41BE03BEC7A355228C99CBF32F3432D9E21 [p.40] Ethics and Compliance Operating ethically is not only the right thing to do, it also earns us the respect and trust of our customers, which ensures continued business advantages. The Vice President and Chief Ethics, Compliance and Sustainability Officer regularly reports to the Board of Directors on all matters relating to business conduct. He also oversees regular assessments of our organizational risks and implements appropriate controls to mitigate those risks. **[3] Code of Conduct (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.9] Expectation of leaders and supervisors

If we lead or supervise others, we have additional responsibilities to:

[…]

- Identify and help to mitigate ethics and compliance risks, as well as other business risks

Question
2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?
Score
0
Comments
Although the company's Audit Committee provides oversight of the anti-bribery and corruption programme, there is no publicly available evidence that the company regularly audits this programme.
Evidence
[4] Audit Committee Charter (Document) Accessed 29/08/2019 https://s24.q4cdn.com/975203404/files/doc_downloads/committee_description/Oshkosh-Board-of-Directors-Audit-Committee-Charter.pdf [p.1] Purpose The purpose of the Audit Committee of the Board of Directors ("Audit Committee") shall include assisting the Company's Board of Directors in oversight of […] (f) the implementation and effectiveness of the Company's ethics and compliance program. In so doing, it is the responsibility of the Audit Committee to maintain free and open communication between and among the directors, the independent registered public accounting firm, the internal auditors, outside counsel and the financial and operating management of the Company. [p.2] Responsibilities [p.5] 9. Meet with the Company's Chief Ethics and Compliance Officer to review the implementation and effectiveness of the Company's ethics and compliance program. The Chief Ethics and Compliance Officer and, as to matters involving compliance with applicable laws and regulations, the Company's General Counsel shall have direct reporting authority to the Audit Committee, as appropriate. 10. Obtain, on a quarterly basis, reports on hotline calls and disposition of related matters. 11. Advise the Board of Directors with respect to the Company's ethics and compliance program and compliance with applicable laws and regulations. [p.8] 21. Oversee the internal audit function of the Company including its objectivity, responsibilities, competence, the proposed audit plans for the coming year, the coordination of such plans with the independent registered public accounting firm, the quality and timeliness of internal audit activities and the budget and staffing of the internal audit function. 22. Receive and review, prior to each meeting, a summary of findings from completed internal audits and a status report on the annual internal audit plan, with explanations for any deviations from the original plan. At its discretion, the Audit Committee may seek copies of particular internal audits.

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
1
Comments
There is evidence that the company has a system for tracking, investigating and responding to bribery and corruption allegations or incidents. The company commits to promptly investigating incidents and there is evidence that reports and investigations are documented and received by independent teams. There is evidence that the company has a specific procedure in place to deal with whistleblowing cases, which are handled by an external party, and whistleblowers have the option to receive updates on the outcome of investigations. The Audit Committee receives reports concerning the company's whistleblowing line and summary information investigations on a quarterly basis. However, the company's stated procedures do not cover the whole investigation process from receipt of the report to final outcome, and so receives a score of '1'.
Evidence
[16] Updated - Ethics – Our Story (Webpage) Accessed 04/05/2020 https://www.oshkoshcorp.com/story/ethics The Oshkosh Ethics Helpline is a global, multilingual helpline to access resources, ask questions and file ethics and compliance reports anonymously. The line is managed by an independent third-party and available around the clock. We set up the helpline to solidify our corporate commitment to ethical behavior and encourage all our stakeholders to conduct business the right way. Each report is evaluated by the Global Ethics & Compliance Team who assigns and oversees each investigation to ensure it is conducted by an independent party following a standard process. The Vice President, Chief Ethics, Compliance and Sustainability Officer is responsible for disclosing criminal offenses to the appropriate authorities and providing quarterly updates of all investigations to the Audit Committee of the Oshkosh Board of Directors. **[3] Code of Conduct (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.7] 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.

[6] EthicsPoint FAQs (Document)
Accessed 10/01/2020
https://secure.ethicspoint.com/domain/media/en/gui/55824/faq.pdf
[p.1] About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

• We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.

• Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.

• An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

[p.2] What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct, or other concern you may have.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself.

[…]

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with

evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

[p.6] What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

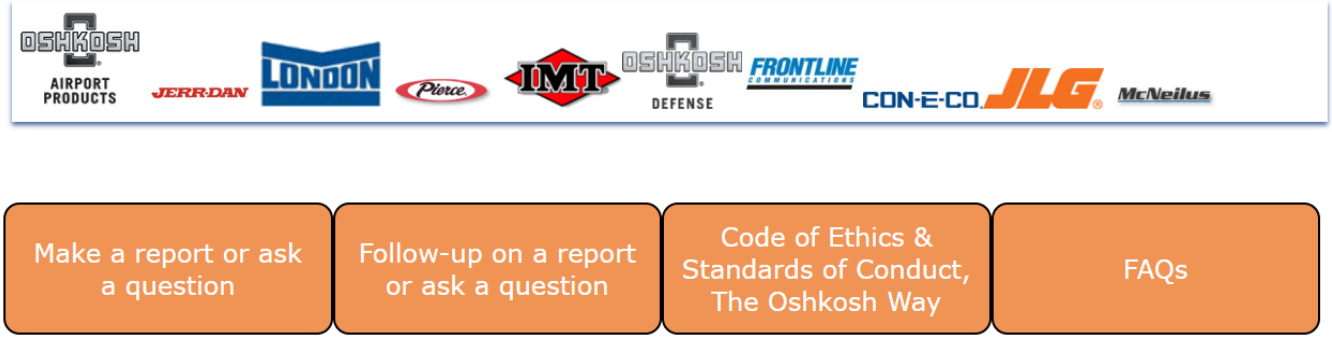
What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

[7] EthicsPoint (Webpage)
Accessed 29/08/2019
https://secure.ethicspoint.com/domain/media/en/gui/55824/index.html



[…]

After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-6 business days, use your report key and password to follow-up.

[4] Audit Committee Charter (Document)
Accessed 29/08/2019
https://s24.q4cdn.com/975203404/files/doc_downloads/committee_description/Oshkosh-Board-of-Directors-Audit-Committee-Charter.pdf
[p.1] Membership

The Audit Committee shall consist of not less than three members, including the chair, who meet the independence and experience requirements of the SEC and the New York Stock Exchange (the "NYSE").

[p.2] Responsibilities

[p.5] 9. Meet with the Company's Chief Ethics and Compliance Officer to review the implementation and effectiveness of the Company's ethics and compliance program. The Chief Ethics and Compliance Officer and, as to matters involving compliance with applicable laws and regulations, the Company's General Counsel shall have direct reporting authority to the Audit Committee, as appropriate.

10. Obtain, on a quarterly basis, reports on hotline calls and disposition of related matters.

[12] Code of Ethics for Directors and Senior Executives (Document)
Accessed 26/02/2020
https://s24.q4cdn.com/975203404/files/doc_downloads/policies/updated/Oshkosh-Code-of-Ethics-for-Directors-and-Senior-Executives.pdf
[p.3] IX. It is each Executive Team member's responsibility to promptly notify the General Counsel or Chairman of the Governance Committee regarding any actual or potential violation of this Code by any member of the Executive Team of the Company's Code of Ethics/Standards of Conduct by any employee or of any law, rule or regulation by the Company or its employees of which such member becomes aware. It is the duty of the General Counsel or the Chairman of the Governance Committee to conduct or seek a thorough investigation of the alleged violation by an appropriate disinterested party and then report it to the Governance Committee.

[5] Non-Retaliation Policy (Document)
Accessed 01/09/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Non-Retaliation%20Policy.pdf?la=en&hash=34D25D4A7BB42E3635427EEF752EAA69FF23FF88
[p.2] Employees have an obligation to participate in good faith in any internal investigation, or any investigation of retaliation. Oshkosh takes all complaints seriously and all such complaints will be reviewed promptly, and where appropriate, investigated. Confidentiality regarding reported concerns and problems will be maintained at all times both legally and practically, informing only those personnel who have a need to know.

Employees who believe they have been retaliated against, or are aware of violations of policy, law, regulation and/or unethical behavior, should immediately notify your Supervisor, Location Manager, Human Resources, the Global Ethics & Compliance department call the Ethics Helpline at 1-866-554-3844, or submit a report through the EthicsHelpline web www.tnwinc.com/reportline/Oshkosh.

Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
0
Comments
The company states that individuals handling whistleblowing reports have received training in ensuring that the reports remain confidential. Further statements indicate that the Global Ethics and Compliance Team ensures that investigative procedures are followed. However, there is insufficient publicly available evidence that the company assures itself of the quality of its internal investigations.
Evidence
[6] EthicsPoint FAQs (Document) Accessed 10/01/2020 https://secure.ethicspoint.com/domain/media/en/gui/55824/faq.pdf [p.2] Where do these reports go? Who can access them? Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence. **[16] Updated - Ethics – Our Story (Webpage)** Accessed 04/05/2020 https://www.oshkoshcorp.com/story/ethics The Oshkosh Ethics Helpline is a global, multilingual helpline to access resources, ask questions and file ethics and compliance reports anonymously. The line is managed by an independent third-party and available around the clock. We set up the helpline to solidify our corporate commitment to ethical behavior and encourage all our stakeholders to conduct business the right way. Each report is evaluated by the Global Ethics & Compliance Team who assigns and oversees each investigation to ensure it is conducted by an independent party following a standard process.

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
2
Comments
The company makes a clear commitment to report material findings of bribery and corruption from investigations to the board. An appropriate senior individual, the Vice President, Chief Ethics, Compliance and Sustainability Officer, is ultimately responsible for ensuring that the disclosure of criminal offences to relevant authorities is evaluated and acted upon if necessary.
Evidence

[16] Updated - Ethics – Our Story (Webpage)
Accessed 04/05/2020
https://www.oshkoshcorp.com/story/ethics
Each report is evaluated by the Global Ethics & Compliance Team who assigns and oversees each investigation to ensure it is conducted by an independent party following a standard process. The Vice President, Chief Ethics, Compliance and Sustainability Officer is responsible for disclosing criminal offenses to the appropriate authorities and providing quarterly updates of all investigations to the Audit Committee of the Oshkosh Board of Directors. Questions about Oshkosh Corporation's Global Ethics & Compliance program can be directed to Kevin Tubbs, Vice President, Chief Ethics, Compliance and Sustainability Officer, at complyspace@oshkoshcorp.com or at 920.502.3043.

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9
[p.10] 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.

[p.43] 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.

[12] Code of Ethics for Directors and Senior Executives (Document)
Accessed 26/02/2020
https://s24.q4cdn.com/975203404/files/doc_downloads/policies/updated/Oshkosh-Code-of-Ethics-for-Directors-and-Senior-Executives.pdf

[p.3] IX. It is each Executive Team member's responsibility to promptly notify the General Counsel or Chairman of the Governance Committee regarding any actual or potential violation of this Code by any member of the Executive Team of the Company's Code of Ethics/Standards of Conduct by any employee or of any law, rule or regulation by the Company or its employees of which such member becomes aware. It is the duty of the General Counsel or the Chairman of the Governance Committee to conduct or seek a thorough investigation of the alleged violation by an appropriate disinterested party and then report it to the Governance Committee.

Question
2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?
Score
1
Comments
The company publishes summary data of the number of reports received on its whistleblowing service relating to violations of its Code of Conduct, including bribery and corruption incidents. The data relates to employees at all levels and is published annually. The data, however, does not include information on the number of investigations launched, nor disciplinary action taken as a result of investigation findings.
Evidence
[17] 2018 Sustainability Report (Document) Accessed 05/05/2020 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/impact/sustainability/Sust%20Report%20PDFs/2018_Sustainability%20Report.pdf?la=en&hash=9C05F41BE03BEC7A355228C99CBF32F3432D9E21 [p.40] We also maintain an anonymous helpline for team members to report concerns and seek guidance. This multilingual global helpline is managed by a third-party provider and is available 24 hours a day, 7 days a week. In 2018, we received 186 reports to our helpline of potential violations to The Oshkosh Way, equivalent to 12 reports per 1,000 team members. Each report is investigated and evaluated for appropriate corrective action, which ranges from additional training to termination of employment.

3. Support to Employees

Question
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
Score
1
Comments
There is evidence that the company provides a training module that outlines the basic principles of the anti-bribery and corruption policy, including the whistleblowing options available to employees. Evidence indicates that company provides training to all employees across all locations. However, it is unclear how frequently training is conducted. Additionally, it is unclear if training is provided in all appropriate languages.
Evidence
[17] 2018 Sustainability Report (Document) Accessed 05/05/2020 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/impact/sustainability/Sust%20Report%20PDFs/2018_Sustainability%20Report.pdf?la=en&hash=9C05F41BE03BEC7A355228C99CBF32F3432D9E21 [p.40] ETHICS TRAINING AND REPORTING We provide team members and business partners with education and resources to help them do the right thing. We require all team members to participate in ethics and compliance training, based on each individual's role, location and level within our organization. All suppliers are also required to review our ethics and compliance requirements. **[3] Code of Conduct (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.5] 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. [p.9] 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.

Question
3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees: **a) Employees in high risk positions,** **b) Middle management,** **c) Board members.**
Score
1
Comments
The company states that employees in certain positions receive tailored anti-bribery and corruption training. However, these positions are unclear and do not make specific reference to all three categories of employee referred to in the question. Additionally, the company does not state that training for employees in high risk positions is refreshed on at least an annual basis.
Evidence
[17] 2018 Sustainability Report (Document) Accessed 05/05/2020 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/impact/sustainability/Sust%20Report%20PDFs/2018_Sustainability%20Report.pdf?la=en&hash=9C05F41BE03BEC7A355228C99CBF32F3432D9E21 [p.40] ETHICS TRAINING AND REPORTING We provide team members and business partners with education and resources to help them do the right thing. We require all team members to participate in ethics and compliance training, based on each individual's role, location and level within our organization. All suppliers are also required to review our ethics and compliance requirements. **[3] Code of Conduct (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.5] 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. [p.9] 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.

Question
3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?
Score
1
Comments
There is some evidence that the company reviews its anti-bribery and corruption communications and training programme annually. However, the measures described for doing so appear overly simplistic and are limited to completion rates. There is also no evidence that the results of such reviews are used to update specific parts of the training programme.
Evidence
[4] Audit Committee Charter (Document) Accessed 29/08/2019 https://s24.q4cdn.com/975203404/files/doc_downloads/committee_description/Oshkosh-Board-of-Directors-Audit-Committee-Charter.pdf [p.2] Responsibilities [p.5] 9. Meet with the Company's Chief Ethics and Compliance Officer to review the implementation and effectiveness of the Company's ethics and compliance program. The Chief Ethics and Compliance Officer and, as to matters involving compliance with applicable laws and regulations, the Company's General Counsel shall have direct reporting authority to the Audit Committee, as appropriate. **[17] 2018 Sustainability Report (Document)** Accessed 05/05/2020 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/impact/sustainability/Sust%20Report%20PDFs/2018_Sustainability%20Report.pdf?la=en&hash=9C05F41BE03BEC7A355228C99CBF32F3432D9E21 [p.38] 100% OF TEAM MEMBERS TRAINED ON CODE OF CONDUCT

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company's incentive schemes incorporate ethical or anti-bribery and corruption principles.
Evidence
No evidence found.

Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
0
Comments
There is insufficient evidence that the company commits to support or protect employees who refuse to act unethically.
Evidence
[3] Code of Conduct (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.20] 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.

Question
3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?
Score
1
Comments
There is evidence that the company promotes a policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents that explicitly applies to all employees across the organisation, including those employed by the group as third parties and suppliers. However, there is no evidence that the company assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means.
Evidence
[5] Non-Retaliation Policy (Document) Accessed 01/09/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Non-Retaliation%20Policy.pdf?la=en&hash=34D25D4A7BB42E3635427EEF752EAA69FF23FF88 [p.1] All employees are responsible for promptly reporting actual or potential wrongdoing, violations of law, rules, regulations, policy and/or procedure. Global Ethics and Compliance has an "Open Door Policy" to allow individuals to report any problems or concerns. Retaliation against a person who files a good faith complaint or reports wrongdoing, participates in an investigation, or reports any illegal or unethical behavior, will not be tolerated. Any employee who participates in retaliation will be subject to serious disciplinary action, up to and including termination of employment. [p.2] Employees who, in good faith, report a problem, concern, or complaint, or participate in an investigation, remain subject to the same standards of performance and conduct as other employees. Additionally, no employee may be adversely affected because s/he refused to carry out a directive which constitutes fraud, or is a violation of local, state, federal, or other applicable laws and regulations. Retaliation is prohibited against any employee, even if his or her complaints are proven unfounded by an investigation. […] Employees who believe they have been retaliated against, or are aware of violations of policy, law, regulation and/or unethical behavior, should immediately notify your Supervisor, Location Manager, Human Resources, the Global Ethics & Compliance department call the Ethics Helpline at 1-866-554-3844, or submit a report through the EthicsHelpline web www.tnwinc.com/reportline/Oshkosh. **[3] Code of Conduct (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.9] 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. [p.10] Anti-Retaliation Commitment 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.

[9] Supplier Code of Conduct [Document]
Accessed 02/09/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Supplier%20Code%20of%20Conduct/Oshkosh_Supplier_Code_Of_Conduct_English.pdf?la=en&hash=538A59D3856928D0B58C636D90072510FBAA2726

[p.3] The Supplier Code of Conduct details the requirements and expectations we have of ourselves and our suppliers. We expect 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 as a condition of doing business with Oshkosh Corporation.

Our Code of Ethics and Standards of Business Conduct, 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 Code.

[p.4] 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.

Question
3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?
Score
2
Comments
The company has multiple channels to report instances of suspected corrupt activity and seek advice on the company's anti-bribery and corruption programme. Channels are sufficiently varied to allow employees to raise concerns across the management chain and to a relevant external organisation. These channels allow for confidential and, wherever possible, anonymous reporting. There is also evidence that these reporting channels are available and accessible to employees in all jurisdictions where the company operates, including those employed by the group as third parties, suppliers and joint venture partners, and in all relevant languages.
Evidence

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9

[p.9] 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.

[p.10] 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.

[5] Non-Retaliation Policy (Document)
Accessed 01/09/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Non-Retaliation%20Policy.pdf?la=en&hash=34D25D4A7BB42E3635427EEF752EAA69FF23FF88
[p.1] All employees are responsible for promptly reporting actual or potential wrongdoing, violations of law, rules, regulations, policy and/or procedure. Global Ethics and Compliance has an "Open Door Policy" to allow individuals to report any problems or concerns. Retaliation against a person who files a good faith complaint or reports wrongdoing, participates in an investigation, or reports any illegal or unethical behavior, will not be tolerated. Any employee who participates in retaliation will be subject to serious disciplinary action, up to and including termination of employment.

[p.2] Employees have an obligation to participate in good faith in any internal investigation, or any investigation of retaliation. Oshkosh takes all complaints seriously and all such complaints will be reviewed promptly, and where appropriate, investigated. Confidentiality regarding reported concerns and problems will be maintained at all times both legally and practically, informing only those personnel who have a need to know.

Employees who believe they have been retaliated against, or are aware of violations of policy, law, regulation and/or unethical behavior, should immediately notify your Supervisor, Location Manager, Human Resources, the Global Ethics & Compliance department call the Ethics Helpline at 1-866-554-3844, or submit a report through the EthicsHelpline web www.tnwinc.com/reportline/Oshkosh.

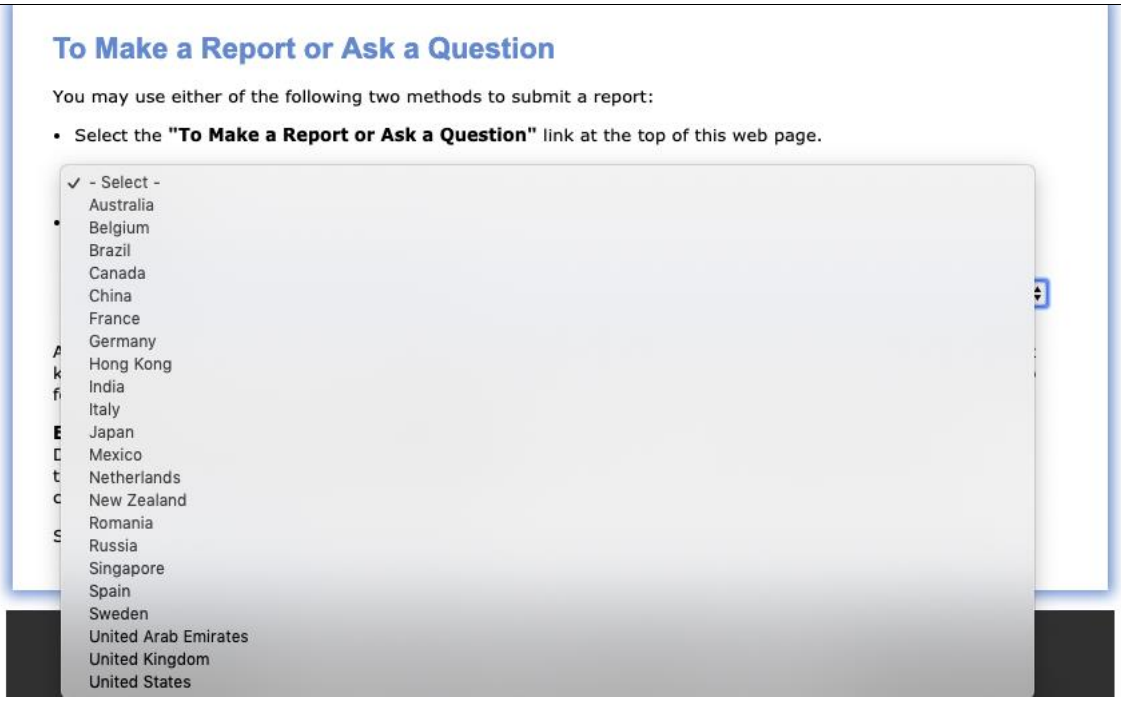
[7] EthicsPoint (Webpage)
Accessed 29/08/2019
https://secure.ethicspoint.com/domain/media/en/gui/55824/index.html

العربية Deutsch English Español Français (France) हिंदी Italiano 日本語 Nederlands Português Română Русский Svenska 汉语 汉语[S]

ATTENTION! This webpage is hosted on EthicsPoint's secure servers and is not part of the Oshkosh Corporation website or intranet.

[…]

Make a report or ask a question | Follow-up on a report or ask a question | Code of Ethics & Standards of Conduct, The Oshkosh Way | FAQs



After you complete your report you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-6 business days, use your report key and password to follow-up.

[6] EthicsPoint FAQs (Document)
Accessed 10/01/2020
https://secure.ethicspoint.com/domain/media/en/gui/55824/faq.pdf
[p.1] About EthicsPoint What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

• We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.

• Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.

• An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

[p.2] May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for employees to report any violation of our stated Code of Conduct, or other concern you may have.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

When you observe some behavior that you believe violates our code of conduct, we expect you to report it. Ideally, you should bring any concerns forward to your direct manager, or other member of our management team. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself

[…]

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

[p.4] It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith…" or "In my 33 years…".

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

[9] Supplier Code of Conduct (Document)
Accessed 02/09/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Supplier%20Code%20of%20Conduct/Oshkosh_Supplier_Code_Of_Conduct_English.pdf?la=en&hash=538A59D3856928D0B58C636D90072510FBAA2726
[p.12] SUPPLIER SELF-MONITORING

If any supplier has an actual or potential ethical or legal concern related to the subject matter of the Code or any engagement or relationship with Oshkosh Corporation, they are encouraged to make Oshkosh Corporation aware of this concern. This can be done through the Code Connection Helpline.

REPORTING CODE VIOLATIONS

The Code Connection 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.

HOW TO REPORT

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

COUNTRY	TOLL-FREE NUMBER	COUNTRY	TOLL-FREE NUMBER
United States	866-554-3844	Italy	800-788433
Australia	1-800-13-4749	Mexico	01-800-436-0215
Belgium	0800-7-5665	Netherlands	0800-022-1732
Brazil	0800-891-4414	Norway	800-10156
China (North)	10-800-711-7060	Poland	0-0-800-111-1627
China (South)	10-800-110-0702	Romania (AT&T Direct Access Code)	080-803-4288 (800-566-8709)
Denmark	80-887125		
France	0800-91-3705	Spain	900-97-1047
Germany	0800-182-5408	Sweden	020-79-7599
Hong Kong	800-900542	United Kingdom	0808-234-7588

[1] Ethics – Our Story (Webpage)
Accessed 29/08/2019
https://www.oshkoshcorp.com/story/ethics
ETHICS QUESTION OR CONCERN?

The Oshkosh Ethics Helpline is a global, multilingual helpline to access resources, ask questions and file ethics and compliance reports anonymously. The line is managed by an independent third-party and available around the clock. We set up the helpline to solidify our corporate commitment to ethical behavior and encourage all our stakeholders to conduct business the right way. Questions about Oshkosh Corporation's Global Ethics & Compliance program can be directed to Kevin Tubbs, Vice President, Chief Ethics, Compliance and Sustainability Officer, at complyspace@oshkoshcorp.com or at 920.502.3043.

[14] Statement To Suppliers RE Gifts (Document)
Accessed 24/03/2020
https://osn.oshkoshcorp.com/docs/ssg/Sect%20N.pdf
[p.1] Section N: Gift and Gratuity Policy
Revised: June 27, 2016

As a Federal Government contractor, Oshkosh Corporation is subject to the "Federal Acquisition Regulation" (FAR 3.502) and the Anti Kickback Act of 1986 (41 U.S.C. 51-58 (1999)).

In general, this legislation exists to deter subcontractors from making payments to influence the award of subcontracts. To avoid the appearance or the fact of an illegal or improper inducement, we ask you to instruct your employees not to make to any Oshkosh Corp employee or to the Company any payment, or promise to pay, (whether a fee, commission, compensation, rebate, loan, gift or gratuity) to influence the award of subcontracts or as an acknowledgment of the award of the subcontract.

Oshkosh Corporation policy is as follows:
"The sale of our products must always be free from the perception that we sought or received favorable treatment based on gifts, entertainment, favors or hospitality. Likewise, our purchases must be based on quality, price and performance alone. Our policies specifically prohibit offering, giving, soliciting or receiving any form of bribe or kickback, to anyone (both private and public parties)…..

If any Oshkosh Corp employee seeks to receive any payment of any kind to influence the selection of a supplier, please use the Oshkosh Corporation Helpline phone number at 1-866-554-3844 or submit a report directly to www.tnwinc.com/reportline/Oshkosh. You may also contact the Vice President, Ethics and Compliance at 920-235-9150. Your call will be treated confidentially, if you so wish.

[12] Code of Ethics for Directors and Senior Executives (Document)
Accessed 26/02/2020
https://s24.q4cdn.com/975203404/files/doc_downloads/policies/updated/Oshkosh-Code-of-Ethics-for-Directors-and-Senior-Executives.pdf
[p.3] XI. It is each Executive Team member's responsibility to promptly notify the General Counsel or Chairman of the Governance Committee regarding any actual or potential violation of this Code by any member of the Executive Team of the Company's Code of Ethics/Standards of Conduct by any employee or of any law, rule or regulation by the Company or its employees of which such member becomes aware. It is the duty of the General Counsel or the Chairman of the Governance Committee to conduct or seek a thorough investigation of the alleged violation by an appropriate disinterested party and then report it to the Governance Committee. All members of the Executive Team are responsible for ensuring that their own conduct complies with this Code.

4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
1
Comments
There is evidence that the company has a policy on conflicts of interest, which covers actual, potential and perceived conflicts. The policy refers to employee relationships, financial interests and external employment as categories of conflict. The policy applies to all employees and board members, including those of subsidiaries and other controlled entities. However, there is no publicly available evidence that the company's policy covers conflicts of interest related to government relationships.
Evidence
[8] Conflict of Interest Policy (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/2020_02_04_Conflict_of_Interest_Policy.pdf?la=en&hash=A132FC9037843C5636E84BF151D60EEC8C39586C [p.1] SCOPE This policy applies to any situation where there is a potential for divided loyalties between your personal interests and your obligations as an employee of the Company. An activity constituting an actual conflict of interest is never acceptable, and you must avoid any activity involving even the appearance of such a conflict unless you have proper approval. Also, you may not engage other people to do indirectly what you are prohibited from doing yourself. POLICY The Company will not enter into any contract, transaction or other arrangement involving a Conflict of Interest without establishing appropriate safeguards to protect the Company's interests. Conflicts of interest can arise in many instances including significant personal relationships, investments in other businesses, outside employment and other affiliations, and exchanging business courtesies. Significant Personal Relationships A conflict can arise if you, a family member, or a close personal friend has a personal stake in a company that is a current or potential customer, supplier, or sales agent (distributor, sales representative, etc.) This potential conflict must be disclosed to the Company. If you find yourself in this situation, you must not use your position to influence the bidding process or negotiations in any way. If you are directly involved in the decision-making process, you must notify your manager immediately and remove yourself from the decision-making process. A perceived or actual conflict may arise if a personal or [p.2] family relationship between employees exists, particularly one that is also a reporting relationship. The Company respects the privacy of personal affairs of all employees, but employees must disclose to their manager and Human Resources the existence of a family member relationship or an intimate or romantic relationship where there exists a direct or indirect chain of command. It is important to avoid even the appearance of bias, impropriety or undue influence or favoritism, so any relationships that could be viewed as such should be disclosed to your manager and Human Resources. The Company will make decisions on these situations on a case-by-case basis. Investment in Other Businesses Making use of business opportunities discovered or learned through your position at the Company may result in an inappropriate personal gain for you, a family member or someone with whom you have a close personal relationship. Personal relationships with suppliers, customers and others must not affect our decisions and

judgment, and in general, you should avoid financial interests in any companies if you have any influence in the Company's decisions affecting the other company. If you face a situation where you feel there may be a conflict, you should report all pertinent details to your manager and to the Company.

Outside Employment and Other Affiliations
Sometimes taking outside employment creates an actual or potential conflict of interest. You must not take another job that interferes with your ability to do your job at our Company. This includes, among other things, operating an outside business during working hours, performing any work for another entity during the time you are expected to be performing work for our Company, or using Company property, equipment or information for non-Company uses.

If you are considering taking an outside job, you should contact your supervisor for guidance before doing so. If you are considering any outside job with or serving on the board of directors for a supplier, customer or competitor of the Company or for an industry organization or standard setting board, you must obtain prior written approval from all three of: (1) your manager, (2) Global Ethics & Compliance, and (3) the Executive Leadership Team member for your group. Executive Leadership Team members wishing to serve on the board of directors of other companies must obtain prior approval of the General Counsel and the Oshkosh Corporation Board of Directors' Human Resources Committee. An employee may not participate in a joint venture, partnership or other business arrangement with the Company without full disclosure and prior written approval as set forth in the preceding paragraph. While employees are encouraged to engage in activities such as public service and civic affairs, serve on community boards

[p.3] and make contributions of personal time or financial resources to charitable, educational, and community service organizations, care must be taken to avoid potential conflicts of interest between our Company and the organization you wish to serve. If an organization with which you are involved seeks to do business with our Company or seeks donations from our Company, you should fully disclose the situation to decision-making Company personnel.

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9
[p.9] 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.

[p.26] 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.

[12] Code of Ethics for Directors and Senior Executives (Document)
Accessed 26/02/2020
https://s24.q4cdn.com/975203404/files/doc_downloads/policies/updated/Oshkosh-Code-of-Ethics-for-Directors-and-Senior-Executives.pdf
[p.1] Code of Ethics for Directors and Senior Executives

It is critical to the success of Oshkosh Corporation (the "Company") and in the best interests of its shareholders that its employees and directors conduct themselves honestly and ethically. In particular, each director of the Company and each member of the Company's senior executive management team, including the Chief Executive Officer, the Chief Operating Officer, the Chief Financial Officer, the Chief Accounting Officer, the Treasurer, the General Counsel, the Corporate Accounting Manager, and the Presidents, Vice Presidents of Finance and Controllers of the Company's business units, or persons holding positions with similar responsibilities at a business unit, and other officers elected by the Board of Directors of the Company at the vice president level or higher (collectively, the "Executive Team"), are required to observe the highest standards of ethical business conduct, including strict adherence to this Code of Ethics Applicable to Directors and Senior Executives and, in the case of members of the Company's senior executive management team, the Company's Code of Ethics/Standards of Conduct applicable to all employees.

Accordingly, each member of the Executive Team must comply with the letter and spirit of the following:

I. Each member of the Executive Team will act at all times honestly and ethically, avoiding actual or apparent conflicts of interest between personal and professional relationships. For purposes of this Code, the phrase "actual or apparent conflict of interest" shall be broadly construed and include, for example, direct conflicts, indirect conflicts, potential conflicts, apparent conflicts and any other personal, business or professional relationship or dealings that has a reasonable possibility of creating even the mere appearance of impropriety.

II. Wherever there is the potential for an actual or apparent conflict of interest, each member of the Executive Team must take all reasonable and necessary steps to avoid such a conflict. In order to avoid effectively an actual or apparent conflict of interest, each member of the Executive Team is required to make promptly full, fair and accurate disclosure to the General Counsel or to the Chairman of the Audit Committee of any proposed transaction or relationship that has a reasonable possibility of giving rise to such a conflict.

Question
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
Score
2
Comments
There is evidence that the company has procedures to identify, declare and manage conflicts of interest, including actual, potential and perceived conflicts. There is evidence that the Global Ethics & Compliance department has oversight and accountability for handling cases. There is evidence that all employee and board member declarations are held in a dedicated central depository that is accessible to those responsible for oversight of the process. The description of this procedure also includes examples of criteria for recusals and a description of the potential punitive measures for breaches of the policy.
Evidence

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9
[p.26] 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

[8] Conflict of Interest Policy (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/2020_02_04_Conflict_of_Interest_Policy.pdf?la=en&hash=A132FC9037843C5636E84BF151D60EEC8C39586C
[p.1] Significant Personal Relationships
A conflict can arise if you, a family member, or a close personal friend has a personal stake in a company that is a current or potential customer, supplier, or sales agent (distributor, sales representative, etc.) This potential conflict must be disclosed to the Company. If you find yourself in this situation, you must not use your position to influence the bidding process or negotiations in any way. If you are directly involved in the decision-making process, you must notify your manager immediately and remove yourself from the decision-making process. A perceived or actual conflict may arise if a personal or

[p.2] family relationship between employees exists, particularly one that is also a reporting relationship. The Company respects the privacy of personal affairs of all employees, but employees must disclose to their manager and Human Resources the existence of a family member relationship or an intimate or romantic relationship where there exists a direct or indirect chain of command. It is important to avoid even the appearance of bias, impropriety or undue influence or favoritism, so any relationships that could be viewed as such should be disclosed to your manager and Human Resources. The Company will make decisions on these situations on a case-by-case basis.

Investment in Other Businesses
Making use of business opportunities discovered or learned through your position at the Company may result in an inappropriate personal gain for you, a family member or someone with whom you have a close personal relationship. Personal relationships with suppliers, customers and others must not affect our decisions and judgment, and in general, you should avoid financial interests in any companies if you have any influence in the Company's decisions affecting the other company. If you face a situation where you feel there may be a conflict, you should report all pertinent details to your manager and to the Company.

Outside Employment and Other Affiliations
Sometimes taking outside employment creates an actual or potential conflict of interest. You must not take another job that interferes with your ability to do your job at our Company. This includes, among other things, operating an outside business during working hours, performing any work for another entity during the time you are expected to be performing work for our Company, or using Company property, equipment or information for non-Company uses. If you are considering taking an outside job, you should contact your supervisor for guidance before doing so.
If you are considering any outside job with or serving on the board of directors for a supplier, customer or competitor of the Company or for an industry organization or standard setting board, you must obtain prior written approval from all three of: (1) your manager, (2) Global Ethics & Compliance, and (3) the Executive Leadership Team member for your group. Executive Leadership Team members wishing to serve on the board of directors of other companies must obtain prior approval of the General Counsel and the Oshkosh Corporation Board of Directors' Human Resources Committee. An employee may not participate in a joint venture, partnership or other business arrangement with the Company without full disclosure and prior written approval as set forth in the preceding paragraph. While employees are encouraged to engage in activities such as public service and civic affairs, serve on community boards

[p.3] and make contributions of personal time or financial resources to charitable, educational, and community service organizations, care must be taken to avoid potential conflicts of interest between our Company and the organization you wish to serve. If an organization with which you are involved seeks to do business with our Company or seeks donations from our Company, you should fully disclose the situation to decision-making Company personnel.

[…]

Identification of Potential Conflicts of Interest

Full disclosure and candid discussion are elements of integrity, one of our core values and commitments, and will help ensure that no conflict is present or perceived by others to be present. Full disclosure will also help prevent others from questioning your decisions or intent. You are expected to discuss any potential conflicts of interest with your manager and disclose potential conflicts of interest to Global Ethics & Compliance before starting or continuing the activity in question. Disclosure to Global Ethics & Compliance is accomplished by completing and submitting the Conflict of Interest Questionnaire via the Corporate SharePoint site for Conflicts of Interest within five (5) business days of becoming aware of the potential conflict. Office employees and others with system access are required to complete a Conflict of Interest Questionnaire annually.

Along with the Conflict of Interest Questionnaire, these employees will receive a copy of this Conflict of Interest Policy and will be required to affirm that they have read and understand the Policy. If, after completion of the questionnaire, the employee becomes aware of anything that could give rise to a potential conflict of interest with respect to a proposed contract, transaction or other arrangement involving the Company, the employee is required to update their previous submission on the Corporate SharePoint site for Conflicts of Interest.

[p.4] Failure to disclose potential conflicts of interest, overriding or ignoring mitigation measures implemented to manage the conflict, or continuing a conflict that has been disapproved by management will result in disciplinary action up to, and including, termination of employment.

Determining Whether a Conflict of Interest Exists
Potential or actual conflicts of interest identified via the Conflict of Interest Questionnaire will be reviewed by appropriate management who will perform additional investigation, as deemed appropriate, and analyze whether any such disclosed situations give rise to a Conflict of Interest. Employees will receive guidance regarding any additional action required due to a Conflict of Interest. Additional action may include controls to avoid or mitigate the possible conflict or a recommendation to end the activity in question.

[12] Code of Ethics for Directors and Senior Executives (Document)
Accessed 26/02/2020
https://s24.q4cdn.com/975203404/files/doc_downloads/policies/updated/Oshkosh-Code-of-Ethics-for-Directors-and-Senior-Executives.pdf
[p.1] Code of Ethics for Directors and Senior Executives

[…]

each member of the Executive Team must comply with the letter and spirit of the following:

I. Each member of the Executive Team will act at all times honestly and ethically, avoiding actual or apparent conflicts of interest between personal and professional relationships. For purposes of this Code, the phrase “actual or apparent conflict of interest” shall be broadly construed and include, for example, direct conflicts, indirect conflicts, potential conflicts, apparent conflicts and any other personal, business or professional relationship or dealings that has a reasonable possibility of creating even the mere appearance of impropriety.

II. Wherever there is the potential for an actual or apparent conflict of interest, each member of the Executive Team must take all reasonable and necessary steps to avoid such a conflict. In order to avoid effectively an actual or apparent conflict of interest, each member of the Executive Team is required to make promptly full, fair and accurate disclosure to the General Counsel or to the Chairman of the Audit Committee of any proposed transaction or relationship that has a reasonable possibility of giving rise to such a conflict.

Question
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
Score
2
Comments
There is evidence that the company has a policy and/or procedure, which includes controls to assess and regulate employment and offers of employment to former public officials. As a minimum, the policy requires senior compliance officer (or equivalent) approval for the initiation of any employment discussions with former or current public officials, a review of actual, potential or perceived conflict of interest and restrictions on their activities if such conflicts of interest are identified. There is also evidence that the company has a policy to implement a cooling-off period of at least 12 months before such public officials are permitted to have any form of contact or relationship with their former organisation on the company's behalf.
Evidence
[3] Code of Conduct (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.13] HOW WE ARE COMMITTED TO SERVING GOVERNMENTS Oshkosh's commitment to serving governments means we: […] ● follow all rules when hiring or working with current or former government team members […] 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. **[8] Conflict of Interest Policy (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/2020_02_04_Conflict_of_Interest_Policy.pdf?la=en&hash=A132FC9037843C5636E84BF151D60EEC8C39586C [p.3] Full disclosure and candid discussion are elements of integrity, one of our core values and commitments, and will help ensure that no conflict is present or perceived by others to be present. Full disclosure will also help prevent others from questioning your decisions or intent. You are expected to discuss any potential conflicts of interest with your manager and disclose potential conflicts of interest to Global Ethics & Compliance before starting or continuing the activity in question. Disclosure to Global Ethics & Compliance is accomplished by completing and submitting the Conflict of Interest Questionnaire via the Corporate SharePoint site for Conflicts of Interest within five (5) business days of becoming aware of the potential conflict. Office employees and others with system access are required to complete a Conflict of Interest Questionnaire annually. Along with the Conflict of Interest Questionnaire, these employees will receive a copy of this Conflict of Interest Policy and will be required to affirm that they have read and understand the Policy. If, after completion of the questionnaire, the employee becomes aware of anything that could give rise to a potential conflict of interest with respect to a proposed contract, transaction or other arrangement involving the Company, the employee is required to update their previous submission on the Corporate SharePoint site for Conflicts of Interest.

[p.4] Failure to disclose potential conflicts of interest, overriding or ignoring mitigation measures implemented to manage the conflict, or continuing a conflict that has been disapproved by management will result in disciplinary action up to, and including, termination of employment.

Determining Whether a Conflict of Interest Exists
Potential or actual conflicts of interest identified via the Conflict of Interest Questionnaire will be reviewed by appropriate management who will perform additional investigation, as deemed appropriate, and analyze whether any such disclosed situations give rise to a Conflict of Interest. Employees will receive guidance regarding any additional action required due to a Conflict of Interest. Additional action may include controls to avoid or mitigate the possible conflict or a recommendation to end the activity in question.

Question
4.4. Does the company report details of the contracted services of serving politicians to the company?
Score
0
Comments
There is no evidence that the company reports details of the contracted services of serving politicians.
Evidence
No evidence found.

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
There is evidence that the company permits political contributions in some instances, and has a political action committee. The company therefore receives a score of '0'.
Evidence

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9
[p.6] The Oshkosh Way applies to all directors, officers, team members, contractors, interns, consultants and agents of Oshkosh Corporation

[p.22] 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.)

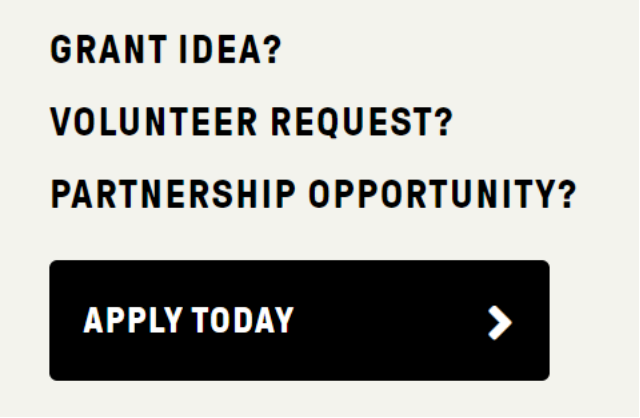
Question
5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?
Score
0
Comments
The company does not disclose any details of its political contributions on its website.
Evidence
No evidence found.

Question
5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?
Score
0
Comments
While the company discloses some information on its charitable contributions, there is no evidence that the company has a policy and/or procedure covering both charitable donations and sponsorships.
Evidence

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9
[p.40] 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

[13] The Oshkosh Corporation Foundation (Webpage)
Accessed 24/03/2020
https://www.oshkoshcorp.com/en/impact/foundation
The Oshkosh Corporation Foundation



The Oshkosh Corporation partners with other organizations to make a difference in communities around the world. Established in 1967, the Foundation distributed over $1 million in grants last year.
The foundation focuses its efforts in four areas:

1 / BASIC NEEDS & ECONOMIC STABILITY

The foundation is committed to helping people move out of poverty, working closely with community organizations like United Way, Habitat for Humanity, food pantries and homeless shelters to help those in need.

Building community is at the heart of what we do. In 2017, we donated a parcel of land in Appleton, Wisconsin to Habitat for Humanity. In order to bring the block back to a standard suitable for residential development and revitalize the area around it, Oshkosh Corporation demolished the unoccupied Pierce facility. Afterwards, more than 20 members of the Oshkosh Airport Products team volunteered over the next several months to help construct the first Habitat for Humanity home on the parcel.

2 / YOUTH MENTORSHIP

We're focused on providing life and job skills training for youth across our communities, partnering with groups like the Boys and Girls Club, Big Brothers Big Sisters and Junior Achievement to prepare young people for their future careers.

Inspiring and preparing young people to succeed is what Junior Achievement is all about. Teaching students in the core content areas of work readiness, entrepreneurship and financial literacy, JA volunteers reach millions of students per year. Oshkosh Corporation team member and JA volunteer D.J. Braemer has volunteered for four years and has personally reached many students, impacting their lives in a positive and inspiring way. D.J. says, "Where else can you make a positive impact on the lives of youth in as little as five hours?" Something he will never forget is a card he received from one of his JA students. It read, "Thank you DJ. I now know what I want to be when I grow up. I want to be just like you."

3 / OSHKOSH FAMILY EXCELLENCE

In addition to providing scholarship opportunities for children of our team members, the Foundation supports the Oshkosh Excellence Awards program, recognizing team members who make an impact within the company and awarding their charity of choice Foundation grants.

The 2019 Oshkosh Excellence Awards brought together team members from around the world to celebrate and present their improvement ideas to a panel of executive judges, who selected winners across categories including: Delighting our Customers, Environmental Responsibility and Sustainability, Innovative Excellence, Human Development and Quick Win. The overall winning team was able to reduce turnover in their facility from 17% to 1.9% by better incorporating our People First culture. The team selected Children's Hospital of Wisconsin to receive a $17,500 grant from the Oshkosh Corporation Foundation. In 2019, the OEAs gave $147,500 to charities selected by winners across all categories.

4 / INDUSTRY-RELATED CAUSES

Our support doesn't stop with team and community members. We're also committed to helping the people we serve, giving to charities like the National Fallen Firefighters Foundation in recognition of those who use our products to make a difference.

We are proud of what we do and enjoy giving back to our supportive communities and the industries we work in, including the fire industry. Each year, Pierce Manufacturing hosts a 9/11 Memorial Stair Climb at Lambeau Field in Green Bay, Wisconsin. The proceeds from the event go to the National Fallen Firefighters Foundation to help survivors rebuild their lives and reduce firefighter deaths. Carrying a badge with the name and picture of a fallen firefighter, climbers are invited to ascend the equivalent of 110 stories – the height of the World Trade Center towers. At the equivalent of the 78th floor (the highest level reached by the firefighters at the World Trade Center), climbers ring a bell in memory of the firefighter on the badge they're carrying.

5.2 Lobbying

Question
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
Score
2
Comments
There is evidence that the company has a policy on lobbying, which includes guidelines on responsible lobbying activities. This policy applies company-wide to all employees, board members and third parties engaged in lobbying activities on the company's behalf. The company provides details on certain standards of conduct comprising responsible lobbying behaviour and describes oversight mechanisms, which apply to all types of lobbyists.
Evidence

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9

[p.9] 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.

[p.22] WHY WE PARTCIPATE 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:

[…]

- 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

Question
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?
Score
0
Comments
The company does not publish any information on its lobbying aims, topics or activities on its website.
Evidence
No evidence found.

Question
5.2.3 Does the company publish full details of its global lobbying expenditure?
Score
0
Comments
The company does not publish any information on its global lobbying expenditure on its website.
Evidence
No evidence found.

5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
1
Comments
There is evidence that the company has a policy and procedure on the giving and receipt of gifts and hospitality. The policy addresses the risks associated with gifts and hospitality given to public officials. The company also states that all gifts and hospitality expenditures must be documented. However, the company does not specify financial or proportional limits or different approval procedures for different types of promotional expenses. There is also no evidence that all gifts and hospitality received, above a certain threshold, are recorded in a centrally held register, which is accessible to those responsible for oversight of the process. Although the company references a separate gifts and entertainment policy, it is not publicly available.
Evidence
[3] Code of Conduct (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.15] 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 To avoid potential conflicts involving the receiving of gifts and entertainment, we: ● never accept gifts that go beyond common business courtesies of nominal value and always discourage suppliers from giving us gifts ● accept meals or entertainment only if they are of nominal value, related to business discussions, and not given during any purchasing or contracting decision

- 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.

MORE RESOURCES

• Conflicts of Interest Policy

• Gifts and Entertainment Policy

• Anti-Bribery & Anti-Corruption Policy

[2] Anti-Bribery Policy (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Anti-Bribery%20%20Anti-Corruption%20Compliance%20English.pdf?la=en&hash=7110CA1F074FA3BE9E61515886FB5973D524D5A8
[p.3] Business Gifts, Entertainment and Travel Expenses:

It is allowable to provide nominal business gifts, entertainment or to provide travel and lodging accommodations as long as these comply with our Company policies, the policies of the intended recipient's organization, gift laws and monetary limits, as applicable. Further guidelines for these expenditures are included in the Global Policy for Gifts and Entertainment (GBL-POL-LGL006) and Global Procedure for Hosting Non-US Government Officials (GBL-PROC-LGL004).

[8] Conflict of Interest Policy (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/2020_02_04_Conflict_of_Interest_Policy.pdf?la=en&hash=A132FC9037843C5636E84BF151D60EEC8C39586C
[p.3] Exchanging Business Courtesies

While the exchange of modest business courtesies can help build business relationships, accepting or providing business courtesies that are excessive or inappropriate can harm your reputation and the reputation of our Company. Offering or accepting gifts or entertainment can potentially be problematic because these can be viewed as attempts to influence the performance of duties and, in some cases, could create a conflict of interest. Further guidelines for business courtesies are included in CORP-POLLGL006, Gifts and Entertainment.

[14] Statement To Suppliers RE Gifts (Document)
Accessed 24/03/2020
https://osn.oshkoshcorp.com/docs/ssg/Sect%20N.pdf
[p.1] Section N: Gift and Gratuity Policy
Revised: June 27, 2016

As a Federal Government contractor, Oshkosh Corporation is subject to the "Federal Acquisition Regulation" (FAR 3.502) and the Anti Kickback Act of 1986 (41 U.S.C. 51-58 (1999)).

In general, this legislation exists to deter subcontractors from making payments to influence the award of subcontracts. To avoid the appearance or the fact of an illegal or improper inducement, we ask you to instruct your employees not to make to any Oshkosh Corp employee or to the Company any payment, or promise to pay, (whether a fee, commission, compensation, rebate, loan, gift or gratuity) to influence the award of subcontracts or as an acknowledgment of the award of the subcontract.

Oshkosh Corporation policy is as follows:
“The sale of our products must always be free from the perception that we sought or received favorable treatment based on gifts, entertainment, favors or hospitality. Likewise, our purchases must be based on quality, price and performance alone. Our policies specifically prohibit offering, giving, soliciting or receiving any form of bribe or kickback, to anyone (both private and public parties).

If any Oshkosh Corp employee seeks to receive any payment of any kind to influence the selection of a supplier, please use the Oshkosh Corporation Helpline phone number at 1-866-554-3844 or submit a report directly to www.tnwinc.com/reportline/Oshkosh. You may also contact the Vice President, Ethics and Compliance at 920-235-9150. Your call will be treated confidentially, if you so wish.

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
1
Comments
There is some evidence that the company's procurement department is responsible for oversight of the company's supplier base. However, in publicly available evidence the company does not does not state that the involvement of the procurement department is required for establishing any new suppliers over a certain threshold. There is also no evidence that the company assures itself of the procurement department's involvement at least every three years.
Evidence
[9] Supplier Code of Conduct (Document) Accessed 02/09/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Supplier%20Code%20of%20Conduct/Oshkosh_Supplier_Code_Of_Conduct_English.pdf?la=en&hash=538A59D3856928D0B58C636D90072510FBAA2726 [p.12] 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 on site 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 Oshkosh Corporation. **[3] Code of Conduct (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.18] 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 […] ● comply with the U.S. Procurement Integrity Act, the FCPA and other applicable laws

Question
6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?
Score
0
Comments
In publicly available evidence, the company simply states that it conducts due diligence on third parties, without providing any further details.
Evidence

[3] Code of Conduct (Document)
Accessed 29/08/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9
[p.18] HOW WE BUILD STRONG RELATIONSHIPS

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

[…]

- conduct due diligence on third parties to ensure they are qualified and reputable

[p.19] HOW WE PREVENT BRIBERY AND CORRUPTION

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

[…]

- perform due diligence to ensure our representatives and agents share our commitment to fighting corruption

[9] Supplier Code of Conduct (Document)
Accessed 02/09/2019
https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Supplier%20Code%20of%20Conduct/Oshkosh_Supplier_Code_Of_Conduct_English.pdf?la=en&hash=538A59D3856928D0B58C636D90072510FBAA2726
[p.12] 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 on site 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 Oshkosh Corporation.

CODE ADHERENCE

Any non-compliance with the Code must be reported and investigated to the extent necessary. Suppliers who do not meet the requirements of this Code will be provided with the opportunity to bring their business up to Oshkosh Corporation standards in a reasonable time frame. We reserve the right to terminate our business relationship with any supplier who fails to do so or refuses to comply with the Supplier Code of Conduct.

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
1
Comments
There is some evidence that the company ensures that all its suppliers have anti-bribery and corruption policies in place. The company states that at a minimum, suppliers must adhere to its Code of Conduct and Supplier Code Of Conduct, which prohibit bribery, and include provisions addressing conflicts of interest, gifts and hospitality, and whistleblowing. There is evidence that the company monitors its suppliers and may terminate relationships if they are found to be noncompliant with its policy. However, there is no publicly available evidence that the company conducts assurance when onboarding new suppliers or when there is a significant change in the business relationship.
Evidence
[9] Supplier Code of Conduct (Document) Accessed 02/09/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Supplier%20Code%20of%20Conduct/Oshkosh_Supplier_Code_Of_Conduct_English.pdf?la=en&hash=538A59D3856928D0B58C636D90072510FBAA2726 [p.5] OUR MISSION STATEMENT […] The Supplier Code of Conduct details the requirements and expectations we have of ourselves and our suppliers. We expect 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 as a condition of doing business with Oshkosh Corporation. Our Code of Ethics and Standards of Business Conduct, 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 Code. If, in the course of business with us, you see an Oshkosh Corporation team member or supplier engaged in known or suspected unethical behavior or legal violations, we encourage you to contact the Code Connection Helpline. All calls to the Helpline are confidential. The Helpline is managed by an independent third-party provider and is available around the clock. [p.8] A PRACTICAL RESOURCE The following information explains the expectations of Oshkosh Corporation regarding workplace standards and business practices of our suppliers. (The term 'suppliers' is used throughout this document to include vendors, contractors and consultants, and any of their employees or subcontractors.) These expectations are consistent with our Code of Conduct, The Oshkosh Way, and like our Code of Conduct, this document should be a tool we can rely on when we are confronted with difficult decisions. The information summarized in the Oshkosh Supplier Code of Conduct is not exhaustive, and as such, there may be other conduct not specifically described that will be considered unacceptable for a supplier. COMPLIANCE WITH LAWS All standards set forth in this Code of Conduct are subject to compliance with applicable laws. We expect our suppliers to operate in full compliance with the laws of their respective country, as a minimum. If any of our requirements in the Supplier Code of Conduct conflicts with applicable laws, the law takes precedence. Should this occur, the supplier must promptly inform Oshkosh Corporation of the conflict.

Suppliers will not violate, misappropriate or infringe upon intellectual property rights of Oshkosh Corporation and its subsidiaries or any third party. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights. Further, suppliers shall not engage in activities that would violate any applicable laws and regulations related to:

• bribery or illegal payments

[p.11] CONFLICTS OF INTEREST

We expect to be judged on our merits, and we give that same respect to our suppliers. Our suppliers should avoid all conflicts of interest or even the appearance of a conflict in all business dealings with Oshkosh Corporation. A potential conflict may arise between a supplier and Oshkosh in any of the following areas, including relative and friends, personal or family financial interests, corporate opportunities and gifts and entertainment. If suppliers believe they are facing an actual or potential conflict of interest, they have a duty to timely disclose it to Oshkosh Corporation.

GIFTS & 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 either directly or indirectly through a third party. Guidance related to gifts and entertainment is included in Section N of the Oshkosh Supplier Standards Guide. Suppliers are expected to comply with the guidance established within this policy and The Oshkosh Way.

[p.14] 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 on site 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 Oshkosh Corporation.

CODE ADHERENCE

Any non-compliance with the Code must be reported and investigated to the extent necessary. Suppliers who do not meet the requirements of this Code will be provided with the opportunity to bring their business up to Oshkosh Corporation standards in a reasonable time frame. We reserve the right to terminate our business relationship with any supplier who fails to do so or refuses to comply with the Supplier Code of Conduct.

SUPPLIER SELF-MONITORING

If any supplier has an actual or potential ethical or legal concern related to the subject matter of the Code or any engagement or relationship with Oshkosh Corporation, they are encouraged to make Oshkosh Corporation aware of this concern. This can be done through the Code Connection Helpline.

REPORTING CODE VIOLATIONS

The Code Connection 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.

HOW TO REPORT

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

Question
6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?
Score
1
Comments
There is some evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required of sub-contractors throughout the supply chain. However, this evidence is in the form of a simple statement and it is unclear how the company does this in practice.
Evidence
[9] Supplier Code of Conduct (Document) Accessed 02/09/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Supplier%20Code%20of%20Conduct/Oshkosh_Supplier_Code_Of_Conduct_English.pdf?la=en&hash=538A59D3856928D0B58C636D90072510FBAA2726 [p.9] SUBCONTRACTORS All subcontractors must be disclosed to Oshkosh Corporation. Any subcontractor retained by an Oshkosh Corporation supplier must be in compliance with this Supplier Code of Conduct, and the supplier is responsible for ensuring its subcontractor's compliance.

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions.
Evidence
No evidence found.

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
0
Comments
There is insufficient publicly available evidence that the company has a policy which addresses the corruption risks associated with the use of agents, or that it includes details of controls to mitigate these risks.
Evidence
[3] Code of Conduct (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.6] IMPACTS ALL OF US 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. [p.19] HOW WE PREVENT BRIBERY AND CORRUPTION […] ● 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

Question
7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?
Score
1
Comments
There is some evidence that the company has formal procedures to conduct due diligence on its agents. However, in publicly available evidence, it is not clear whether agents and the highest risk intermediaries are subject to enhanced due diligence. There is also no evidence that the company repeats due diligence at least every two years and/or when there is a significant change in the business relationship.
Evidence
[3] Code of Conduct (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.18] HOW WE BUILD STRONG RELATIONSHIPS We select our business partners through a rigorous but fair competitive process. This means we: […] ● conduct due diligence on third parties to ensure they are qualified and reputable [p.19] HOW WE PREVENT BRIBERY AND CORRUPTION […] ● 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 **[2] Anti-Bribery Policy (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Anti-Bribery%20%20Anti-Corruption%20Compliance%20English.pdf?la=en&hash=7110CA1F074FA3BE9E61515886FB5973D524D5A8 [p.3] Third Parties […] Third parties are broadly defined to include any person or entity with which the Company does business and including, but not limited to, agents, consultants, distributors, resellers, suppliers and contractors. […] Company employees have an obligation to carefully select every third party that acts on the Company's behalf and to perform due diligence as required within Company procedures.

Question
7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?
Score
0
Comments
There is no evidence that the company aims to establish the beneficial ownership of its agents and intermediaries.
Evidence
[3] Code of Conduct (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.19] HOW WE PREVENT BRIBERY AND CORRUPTION […] ● 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 [p.18] HOW WE BUILD STRONG RELATIONSHIPS We select our business partners through a rigorous but fair competitive process. This means we: […] ● conduct due diligence on third parties to ensure they are qualified and reputable

Question
7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?
Score
0
Comments
There is some evidence that the company's anti-bribery and corruption policy applies to agents and intermediaries. Although the company indicates that it may include termination rights in its contracts with these entities, it does not mention audit rights.
Evidence
[3] Code of Conduct (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.6] IMPACTS ALL OF US 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. **[2] Anti-Bribery Policy (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Anti-Bribery%20%20Anti-Corruption%20Compliance%20English.pdf?la=en&hash=7110CA1F074FA3BE9E61515886FB5973D524D5A8 [p.1] SCOPE This policy applies globally to all employees, officers and directors of the Company and any third party acting on the Company's behalf. […] Failure to follow this policy will subject an employee to disciplinary actions up to and including termination. [p.3] Third Parties This policy prohibits corrupt offers, promises or payments made through third parties acting on behalf of the Company. Third parties are broadly defined to include any person or entity with which the Company does business and including, but not limited to, agents, consultants, distributors, resellers, suppliers and contractors.

Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
1
Comments
There is some evidence that incentive structures for agents are acknowledged as a factor in bribery and corruption risk. However, there is no evidence that the company imposes a threshold on the payment of sales commissions to agents, and there is no requirement that remuneration is paid in stage payments or into local bank accounts.
Evidence
[2] Anti-Bribery Policy (Document) Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Anti-Bribery%20%20Anti-Corruption%20Compliance%20English.pdf?la=en&hash=7110CA1F074FA3BE9E61515886FB5973D524D5A8 [p.3] Third Parties This policy prohibits corrupt offers, promises or payments made through third parties acting on behalf of the Company. Third parties are broadly defined to include any person or entity with which the Company does business and including, but not limited to, agents, consultants, distributors, resellers, suppliers and contractors. All payments to third parties involved in business transactions must be proper, legal and reasonable in nature and value relative to the goods or services being provided by the third parties. […] In addition, contracts with third parties should, to the extent possible, include provisions to mitigate against the risk of potential illicit payments. **[3] Code of Conduct (Document)** Accessed 29/08/2019 https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9 [p.10] HOW WE PREVENT BRIBERY AND 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

Question
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
Score
0
Comments
The company does not publish any details of the agents currently contracted to act for and/or on behalf of the company.
Evidence
No evidence found.

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption related investigations, incidents or the associated disciplinary actions involving agents.
Evidence
No evidence found.

7.2 Joint Ventures

Question
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?
Score
0
Comments
There is no evidence that the company conducts anti-bribery and corruption due diligence on its joint ventures.
Evidence
No evidence found.

Question
7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?
Score
0
Comments
There is no evidence that the company commits to establishing or implementing anti-bribery and corruption policies or procedures in its joint ventures.
Evidence
No evidence found.

Question
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
Score
0
Comments
There is no evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures.
Evidence
No evidence found.

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
0
Comments
There is no evidence that the company addresses the corruption risks associated with offset contracting.
Evidence
No evidence found.

Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
0
Comments
There is no evidence that the company conducts anti-bribery and corruption due diligence on its offset obligations.
Evidence
No evidence found.

Question
8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?
Score
0
Comments
The company does not publish any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of the company's offset programme.
Evidence
No evidence found.

Question
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?
Score
0
Comments
The company does not publish any details of its offset obligations.
Evidence
No evidence found.

9. High Risk Markets

Question
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
Score
0
Comments
There is no evidence that the company acknowledges the corruption risks of operating in different markets, or that risk assessment procedures are used to inform the company's operations in high risk markets.
Evidence
No evidence found.

Question
9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?
Score
1
Comments
The company publishes a list of its consolidated subsidiaries on an annual basis. This includes the country of incorporation of each entity. However, it is not clear that the list includes all of the company's holdings. The list also does not include the percentages owned and countries of operation for each entity.
Evidence

[15] 2019 Annual Report
Accessed 31/03/2020
https://s24.q4cdn.com/975203404/files/doc_financials/2019/ar/Oshkosh_2019AR_10K_34031.pdf
Exhibit 21

Subsidiaries of the Company

Listed below are the Company's wholly owned subsidiaries as of the date of this report. Names of certain inactive or minor subsidiaries have been omitted.

Name	State or Other Jurisdiction of Incorporation or Organization
Kewaunee Fabrications, LLC	Wisconsin
McNeilus Companies, Inc.	Minnesota
Concrete Equipment Company, Inc.	Nebraska
Audubon Manufacturing Corporation	Iowa
Iowa Contract Fabrications, Inc.	Iowa
Iowa Mold Tooling Co., Inc.	Delaware
JLG Industries, Inc.	Pennsylvania
Fulton International, Inc.	Delaware
JLG Equipment Services, Inc.	Pennsylvania
Access Financial Solutions, Inc.	Maryland
JerrDan, LLC	Delaware
JLG New Zealand Access Equipment and Service	New Zealand
JLG Industries Japan Co., Limited	Japan
JLG Industries Korea, Limited	South Korea
JLG Pacific Holdings, Inc.	Pennsylvania
JLG Properties Australia Pty Limited	Australia
OSK Industries LLC	Wisconsin
JLG EMEA Holdings C.V.	Netherlands
JLG Equipment Services Limited	Hong Kong
Oshkosh JLG (Tianjin) Equipment Technology Co. Limited	China
JLG EMEA B.V.	Netherlands
JLG France SAS	France
JLG Ground Support Europe BVBA	Belgium
JLG Industries GmbH	Germany
JLG Deutschland GmbH	Germany
JLG Industries (Italia) S.R.L	Italy
JLG Industries (United Kingdom) Limited	United Kingdom
JLG Manufacturing Central Europe S.R.L.	Romania
JLG Manufacturing Europe BVBA	Belgium
JLG Sverige AB	Sweden
LMI Finance L.P.	Canada
Oshkosh Italy B.V.	Netherlands
Oshkosh Rus, LLC	Russia
Platformas Elevadoras JLG Iberica S.L	Spain
Power Towers Limited	United Kingdom
Power Towers Deutschland GmbH	Germany
Power Towers LLC	United Arab Emirates

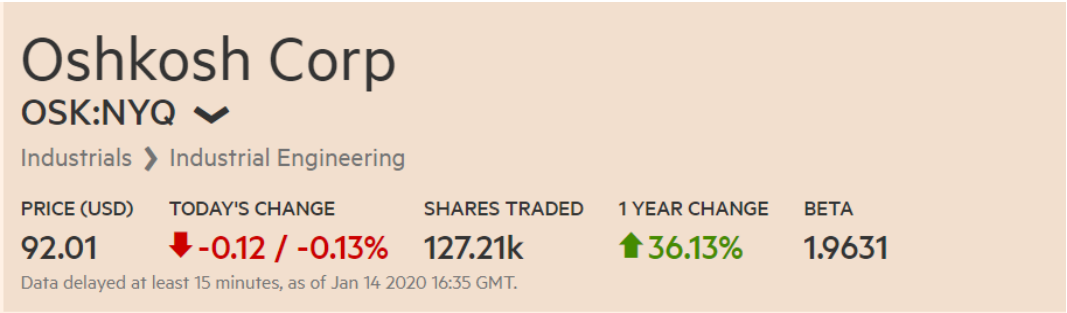
Name	State or Other Jurisdiction of Incorporation or Organization
Oshkosh Europe B.V.	Netherlands
Oshkosh Equipment Manufacturing, S. de R.L. de C.V.	Mexico
Oshkosh-JLG (Singapore) Technology Equipment Private Limited	Singapore
JLG Latino Americana Holdings 1 B.V.	Netherlands
JLG Latino Americana Holdings 2 B.V.	Netherlands
JLG Latino Americana Cooperatief U.A.	Netherlands
JLG Latino Americana Ltda.	Brazil
OSK Company LLC	Wisconsin
Premco Products Inc.	California
JLG Maquinaria Mexico, S. de r.l. de C.U.	Mexico
London Machinery Inc.	Canada
London (Mtl) Inc.	Canada
McIntire Fabricators, Inc.	Iowa
McNeilus Financial Services, Inc.	Minnesota
McNeilus Truck and Manufacturing, Inc.	Minnesota
McNeilus Financial, Inc.	Texas
Viking Truck & Equipment Sales (MI), Inc.	Michigan
Viking Truck & Equipment Sales (OH), Inc.	Ohio
Oshkosh Airport Products, LLC	Wisconsin
Oshkosh Arabia FZE	Dubai
Oshkosh Asia Holdings Limited	Mauritius
Oshkosh Commercial (Beijing) Co., Limited	China
Oshkosh Commercial Products, LLC	Wisconsin
Oshkosh Defense, LLC	Wisconsin
Oshkosh Defense Canada Incorporated	Canada
Oshkosh HD, LLC	Wisconsin
JLG Industries India Private Limited	India
Oshkosh Logistics Corporation	Wisconsin
Oshkosh Manufacturing, LLC	Wisconsin
Pierce Manufacturing Inc.	Wisconsin
TN-GR Holdings, LLC	Delaware

McNeilus Truck and Manufacturing, Inc. owns a 49% interest in Mezcladoras Trailers de Mexico, S.A. de C.V.

Oshkosh Italy B.V. is a 50% joint partner in RiRent Europe B.V. (Netherlands)

Question
9.3 Does the company disclose its beneficial ownership and control structure?
Score
2
Comments
The company is publicly listed on the New York Stock Exchange and therefore automatically receives a score of ‘2’.
Evidence

[11] Financial Times Markets Data (Webpage)
Accessed 14/01/2020
https://markets.ft.com/data/equities/tearsheet/summary?s=OSK:NYQ



Question
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
Score
2
Comments
The company publishes a percentage breakdown for at least 80% of its defence sales by customer. There is evidence that this data is correct to the most recently reported financial year.
Evidence
[10] US SEC, Form 10K, Q4 2018 (Document) Accessed 03/09/2019 https://investors.oshkoshcorp.com/financials/sec-filings/default.aspx [p.90] Defense: This segment consists of Oshkosh Defense. Oshkosh Defense designs and manufactures tactical wheeled vehicles and supply parts and services for the U.S. military and for other militaries around the world. Sales to the DoD accounted for 89.7%, 70.6% and 86.1% of the segment's sales for fiscal 2018, 2017 and 2016, respectively. **[15] 2019 Annual Report** Accessed 31/03/2020 https://s24.q4cdn.com/975203404/files/doc_financials/2019/ar/Oshkosh_2019AR_10K_34031.pdf [p.1] The Company made approximately 24%, 22% and 20% of its net sales for fiscal 2019, 2018 and 2017, respectively, to the U.S. government, a substantial majority of which were under multi-year contracts and programs in the defense vehicle market. See Note 22 of the Notes to Consolidated Financial Statements for financial information related to the Company's business segments. [p.6] Defense segment. Oshkosh Defense sells substantially all of its domestic defense products directly to principal branches of the DoD and has sold its defense products to numerous international militaries around the globe. [p.39] The majority of the Company's defense segment net sales are derived through long-term contracts with the U.S. government to design, develop, manufacture or modify defense products. These contracts, which also include those under the U.S. Government-sponsored Foreign Military Sales (FMS) program, accounted for approximately 95% of defense segment revenue in fiscal 2019.

10. State-Owned Enterprises (SOEs)

Question
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
Score
N/A
Comments
N/A
Evidence

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
N/A
Comments
N/A
Evidence

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
N/A
Comments
N/A
Evidence

Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
N/A
Comments
N/A
Evidence

Question
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
Score
N/A
Comments
N/A
Evidence

List of Evidence & Sources

No.	Type *(Webpage or Document)*	Name	Download Date	Link
01	Webpage	Ethics	29/08/2019	https://www.oshkoshcorp.com/story/ethics
02	Document	Anti-Bribery Policy	29/08/2019	https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Anti-Bribery%20%20Anti-Corruption%20Compliance%20English.pdf?la=en&hash=7110CA1F074FA3BE9E61515886FB5973D524D5A8
03	Document	Code of Conduct	29/08/2019	https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Oshkosh%20Way/The_Oshkosh_Way_English.pdf?la=en&hash=F8F2949362309161772832BAF9922B60EFCDE0E9
04	Document	Audit Committee Charter	29/08/2019	https://s24.q4cdn.com/975203404/files/doc_downloads/committee_description/Oshkosh-Board-of-Directors-Audit-Committee-Charter.pdf
05	Document	Non-Retaliation Policy	01/09/2019	https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/Oshkosh%20Non-Retaliation%20Policy.pdf?la=en&hash=34D25D4A7BB42E3635427EEF752EAA69FF23FF88
06	Document	EthicsPoint FAQs	01/09/2019	https://secure.ethicspoint.com/domain/media/en/gui/55824/faq.pdf
07	Webpage	EthicsPoint	29/08/2019	https://secure.ethicspoint.com/domain/media/en/gui/55824/index.html
08	Document	Conflict of Interest Policy	29/08/2019	https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/2020_02_04_Conflict_of_Interest_Policy.pdf?la=en&hash=A132FC9037843C5636E84BF151D60EEC8C39586C
09	Document	Supplier Code of Conduct	02/09/2019	https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/about/ethics/PDF%20Files/All%20Languages_Supplier%20Code%20of%20Conduct/Oshkosh_Supplier_Code_Of_Conduct_English.pdf?la=en&hash=538A59D3856928D0B58C636D90072510FBAA2726
10	Document	US SEC, Form 10K, Q4 2018	03/09/2019	https://s24.q4cdn.com/975203404/files/doc_financials/quarterly_results/2018/q4/10K-2018.pdf
11	Webpage	Financial Times Markets Data	14/01/2020	https://markets.ft.com/data/equities/tearsheet/summary?s=OSK:NYQ
12	Document	Code of Ethics for Directors and Senior Executives	26/02/2020	https://investors.oshkoshcorp.com/governance/policies-and-guidelines/default.aspx
13	Webpage	The Oshkosh Corporation Foundation	24/03/2020	https://www.oshkoshcorp.com/en/impact/foundation

14	Document	Statement To Suppliers RE Gifts	24/03/2020	https://osn.oshkoshcorp.com/docs/ssg/Sect%20N.pdf
15	Document	2019 Annual Report	31/03/2020	https://s24.q4cdn.com/975203404/files/doc_financials/2019/ar/Oshkosh_2019AR_10K_34031.pdf
16	Webpage	Updated - Ethics – Our Story	04/05/2020	https://www.oshkoshcorp.com/story/ethics
17	Document	2018 Sustainability Report	05/05/2020	https://osk-cdn.scdn2.secure.raxcdn.com/-/media/Oshkosh/OshkoshCorp/impact/sustainability/Sust%20Report%20PDFs/2018_Sustainability%20Report.pdf?la=en&hash=9C05F41BE03BEC7A355228C99CBF32F3432D9E21