Conflict of Interest

PURPOSE

The purpose of this policy is to provide guidance to all team members of Oshkosh Corporation and each of its subsidiaries (collectively referred to herein as the "Company") regarding conflicts of interest. A conflict of interest occurs when you have a personal or outside (non-company) interest that conflicts or may conflict with the best interests 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 as defined in this policy. Also, you may not engage other people to do indirectly what you are prohibited from doing yourself.

SCOPE

This policy applies to all team members of the Company.

DEFINITIONS

Close or Romantic Relationship – A relationship with another person where you are closely acquainted, familiar, private, personal, intimate or romantic.

Family member, relative or member of household – For purposes of this policy, this includes, but may not be limited to, your spouse, domestic partner, fiancée, child (including a step, foster or adoptive child), child's spouse, parent, stepparent, parent-in-law, sibling (including step or half sibling), sister- or brother-in-law, aunt, uncle, nephew, niece, cousin, grandparent, grandchild or anyone residing in your household.

Proper approval – Proper approval includes that you discuss any potential conflicts of interest with your leader and disclose potential conflicts of interest to Global Ethics & Compliance for review and approval before starting or continuing the activity in question.

Supplier – Any person or entity that provides goods or services to the Company.

POLICY

We make decisions on behalf of the Company every day and are responsible for making those decisions in the Company's best interests, independent of any outside influences. We must be able to perform duties and exercise our judgment on behalf of the company without being impacted by conflicts of interest, or the

appearance of conflicts of interest. Judgment or decision-making could be inappropriately influenced when the outside interest:

- Impacts your ability to make decisions in the best interest of the Company,
- Affects your impartiality (for example, in choosing between two suppliers or two potential team members), or
- Introduces personal or non-business issues into what should be a business decision.

We owe a duty to the Company to advance its legitimate interest when the opportunity to do so arises, and not to advance our own interest at the expense of the company. You should always act in the best interest of the Company and avoid actions that could adversely affect the confidence of our customers, suppliers or team members in the Company or its procedures. Full disclosure and candid discussion are elements of our commitment to "do the right thing" 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.

Although we cannot list every conceivable conflict, following are some examples that illustrate actual or apparent conflicts of interest that must be disclosed.

Advisory Organizations and Board Participation

Any advisory or board involvement with outside organizations must be disclosed. If you serve on the board of directors or advisory board for an organization, you should recuse yourself from any decision-making responsibilities relative to the relationship between the two organizations.

If you are considering serving on the board of directors for any company that has a relationship with our Company or for an industry organization or standard setting board, you must obtain prior approval from your direct leader and anyone who may receive philanthropic requests. 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.

Gifts and Entertainment

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 GBL-POL-LGL006, Gifts and Entertainment.

Business Opportunities and Outside Investments

Making use of business opportunities discovered or learned through your position at the Company may result in inappropriate personal gain for you, a family member or someone with whom you have a close personal

relationship. You may not take personal advantage of opportunities that properly belong to the Company, unless properly disclosed and approved in advance.

For example, without full disclosure and proper approval, you may not:

- Purchase, sell or lease real estate or other facilities that you know or have reason to know that the Company may be interested in, or may need in the future.

- Take personal advantage of an opportunity that properly belongs to the Company.

Executive Leadership Team members must obtain prior approval of the General Counsel and the Oshkosh Corporation Board of Directors' Human Resources Committee before entering into any such transaction or negotiation or availing themselves of any such opportunity.

In general, you should avoid financial interests in any companies that have a relationship with the Company if you work with or can direct work to the other company. If you face a situation where you feel there may be a conflict, you should report all pertinent details to your direct leader and to the Company.

Outside Employment

Outside employment can create significant issues for both team members and our Company, including potential conflicts of interest, low productivity, and the theft or misuse of Company assets or intellectual property. 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 or performing any work for another entity during the time you are expected to be performing work for our Company,

- performing work for a company that is performing work or providing services to our Company,

- performing work that is not directed by the Company for a customer or competitor,

- or using Company property, equipment or information for non-Company uses.

If you are considering taking an outside job, you should contact your leader for guidance before doing so. All outside employment must be disclosed.

Government Participation

A conflict of interest may exist if you or a family member, relative or member of household holds or runs for a government position or serves on a municipal or legislative board or agency, especially if the position may have jurisdiction over the interests of Oshkosh Corporation. It is generally suggested that team members avoid holding roles with government entities and municipal or legislative boards or agencies if the position may have jurisdiction over the interests of Oshkosh Corporation. You must also be sensitive to actual or perceived conflicts of interest related to a family member, relative or member of household who holds this type of role.

Government, municipal or legislative positions require disclosure to avoid even the perception that the Company receives beneficial treatment.

Family Member Employment and Relationships

Personal relationships with suppliers, customers and others must not affect decisions and judgment. You must be sensitive to issues of security, confidentiality and conflicts of interest if you, a family member, or a close personal friend has a personal stake in or is employed by a company that is a current or potential customer, supplier, or sales agent (distributor, sales representative, etc.). To avoid or eliminate doubts or suspicions, you must disclose your specific situation 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 direct leader immediately and remove yourself from the decision-making process.

A perceived or actual conflict may arise if a personal or family relationship between team members exists, particularly one that is also a reporting relationship. It is important to avoid even the appearance of bias, impropriety, undue influence or favoritism. While the Company respects the privacy and personal affairs of all team members, the existence of a family member relationship or a close or romantic relationship where there exists a direct or indirect reporting relationship must be disclosed to your direct leader and Human Resources. The Company will make decisions on these situations on a case-by-case basis.

Significant personal relationships that are not required to be disclosed within the Conflict of Interest Questionnaire must be reported to your direct leader and/or Human Resources. Not disclosing significant personal relationships is an ethical violation.

Disclosure of Conflicts of Interest

All office team members will receive the required Conflict of Interest Disclosure Questionnaire annually. New team members will automatically receive the questionnaire during onboarding. You can update your disclosure questionnaire at any time in the Compliance Hub.

You are expected to discuss any potential conflicts of interest with your direct leader and disclose potential conflicts of interest to Global Ethics & Compliance before starting or continuing the activity in question. If you are in doubt about whether a conflict exists, you should always err on the side of full disclosure. The Company will then assist you in determining whether a conflict actually exists and in deciding on an appropriate solution to eliminate or establish appropriate safeguards for the conflict.

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.

Disclosure Review Process

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. Team members 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.