Conflict Minerals Policy

Oshkosh Corporation (‘Oshkosh’) strives to act ethically and responsibly in all situations while respecting and protecting the producers and the users of our products and the environment in which our products are made and sold. Our Global Procurement and Supply Chain team, which is responsible for global materials procurement, communicates these expectations to our suppliers through a number of mechanisms. The Oshkosh Supplier Code of Conduct reinforces the expectation that Oshkosh suppliers shall be good corporate citizens who respect the human rights and dignity of their employees and supply chain partners. The terms and conditions of the Oshkosh Supplier Agreement require compliance with the laws and regulations of the jurisdictions in which we do business. Importantly, to do business with Oshkosh, our suppliers must include terms and conditions from our Supplier Agreement in their agreements with a sub-supplier in the Oshkosh supply chain. Through this process, Oshkosh contract requirements are passed down through the full length of its supply chain.

It has been widely reported that activities of armed groups in the Democratic Republic of the Congo and adjoining countries (together ‘DRC’) are financed by proceeds raised from some mining or smelting operations of Gold, Columbite-Tantalum, Wolframite or Cassiterite and their derivatives Tin, Tungsten and Tantalum, frequently referred to as ‘3TG’ or ‘Conflict Minerals’. These Conflict Minerals have been sold to manufacturers throughout the world. The U.S. Congress has enacted legislation and the Securities and Exchange Commission has adopted rules and regulations which, in summary, require publicly traded companies in the U.S. to investigate their supply chains to determine if the products sold to them contain any 3TG used to finance armed groups. The companies must disclose in a filing with the Securities and Exchange Commission the process followed to determine the country of origin for any 3TG in their products and to disclose the process followed to determine whether the product is sourced from a mine or smelter in the DRC that is financing armed groups.

Oshkosh, like many other U.S. based manufacturers, has a lengthy, complex, and multi-tiered supply chain which can have up to as many as seven or more suppliers. This means that the sources of the raw materials are far removed from the products that Oshkosh directly purchases from its suppliers. Oshkosh has engaged its supply chain partners as it investigates each link in its supply chain. Specifically, first tier Oshkosh suppliers are contractually obligated to: a) make reasonable inquiries as to the country of origin of any 3TG in products it delivers to Oshkosh, whether sourced directly or through a sub-supplier, b) conduct due diligence to confirm whether these 3TG were sourced from a
conflict-free source, meaning from a source that does not finance those who violate human rights, and c) disclose the findings of its country of origin inquiry and due diligence to Oshkosh. As noted above, Oshkosh requires its suppliers to include these same terms in their agreements with sub-suppliers in the Oshkosh supply chain.

This process helps ensure that each tier of the supply chain has a contractual duty to report this information up the chain, ultimately to Oshkosh.

As Oshkosh receives country of origin and due diligence results from its suppliers and sub-suppliers, we are gaining visibility to the sources within our supply chain. Transparency to all levels of our supply chain can only be created by an iterative process that has taken and will continue to take time. Oshkosh is devoting significant resources to ensure that our process is followed and repeated and all relevant data received. This information will be used to complete all reports Oshkosh is required to file to comply with all laws and regulations relating to 3TG. In addition, Oshkosh will communicate relevant 3TG information to its supply chain decision makers as suppliers are evaluated for future business awards. This supports our goal that Oshkosh will not knowingly procure products that include 3TG used to support armed conflict in the DRC.