

OSHKOSH CORPORATION	豪士科集团
GLOBAL POLICY	全球政策
Approved By	审批人
VP, Chief Ethics, Compliance & Sustainability Officer	副总裁兼首席道德与合规官
Title	标题
ANTI-BRIBERY/ANTI-CORRUPTION COMPLIANCE	遵守反贿赂/反腐败法律法规
Prepared By	编制人
Global Ethics & Compliance	全球道德与合规部门
Number	编号
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Last Revised	最近修订日期
June 20, 2016	2016年6月20日
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PURPOSE	目的
It is Oshkosh Corporation's policy to use only ethical business practices while conducting business activities. The purpose of this policy is to ensure that Oshkosh Corporation and each of its subsidiaries (collectively referred to herein as the "Company") comply with applicable anti-bribery and anti-corruption laws and regulations globally. These anti-bribery and anti-corruption 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 any countries in which the Company does or intends to do business.	豪士科集团政策规定，开展商业活动时必须遵守商业道德惯例。本政策旨在确保豪士科集团及其任何子公司（以下统称为“本公司”）遵守全球各地适用的反贿赂和反腐败法律法规的规定。该等反贿赂和反腐败法律法规包括《美国反海外腐败法》（FCPA）、《英国反贿赂法》（UKBA）及本公司已开展或有意前往开展业务的任何国家的反贿赂法律法规。
SCOPE	适用范围
This policy applies globally to all employees, officers and directors of the Company and any third party acting on the Company's behalf.	本政策适用于本公司的全球员工、高管和董事以及任何代表本公司行事的第三方。

<p>All Company employees should be familiar with and observe at all times the requirements of this policy. Failure to follow this policy will subject an employee to disciplinary actions up to and including termination.</p>	<p>本公司全体员工应当熟悉并始终遵守本政策的所有要求。如员工未能遵守本政策，将受到纪律处分，严重者将被解雇。</p>
<p>POLICY</p>	<p>政策</p>
<p>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.</p>	<p>豪士科集团对贿赂和腐败行为采取零容忍态度并要求公司全体员工、高管、董事及任何代表本公司行事的第三方完全遵守适用的反贿赂和反腐败法律法规。该等反贿赂和反腐败法律法规包括《美国反海外腐败法》(FCPA)、《英国反贿赂法》(UKBA)及本公司已开展或有意前往开展业务的任何国家的反贿赂法律法规(无论当地惯例、习俗或竞争环境如何)。</p>
<p>Bribes, Kickbacks and Other Corrupt Payments</p>	<p>贿款、回扣及其他腐败款项</p>
<p>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.</p>	<p>禁止公司员工直接或间接向任何人或组织提供、给予、索取或接受任何类型的不正当款项、礼物或利诱。</p>
<p>The following concepts are essential to understanding the scope of this prohibition:</p>	<p>以下概念对理解本条禁止规定的适用范围至关重要：</p>
<p>Corruption - Obtain or attempt to obtain a personal benefit or business advantage through improper or illegal means. Corruption includes activities such as bribery, extortion and kickbacks.</p>	<p>腐败：通过不正当或非法方式获得或企图获得个人利益或商业好处。具体包括贿赂、敲诈及回扣等行为。</p>
<p>OSHKOSH CORPORATION</p>	<p>豪士科集团</p>

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Title:	标题:
ANTI-BRIBERY/ANTI-CORRUPTION COMPLIANCE	遵守反贿赂/反腐败法律法规
Number:	编号:
GBL-POL-LGL005	GBL-POL-LGL005
Last Revised	最近修订日期
06/20/2016	2016年6月20日
<p>Bribery - Offer to give or receive anything of value with the intent to corruptly influence a person's actions or decisions in order 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.</p>	<p>贿赂: 主动给予或收到任何有价物, 意图不道德地影响相关人士的行为或决策, 以获得任何商业利益或其它不正当好处。有价物包括任何有形或无形的利益, 如现金、娱乐、慈善捐赠、或其他礼物或礼品。</p>
<p>Extortion - Obtain money or some other thing of value by the abuse of one's office or authority.</p>	<p>敲诈: 通过滥用职权获取钱财或其他有价物。</p>
<p>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.</p>	<p>回扣: 为争取客户达成交易, 双方同意以不正当方式给予买家部分销售款或利润, 或提供折扣或回扣。</p>
<p>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.</p>	<p>直接或间接: 如禁止员工直接向他人提供任何款项、礼物或实施赠予或做出承诺等, 则同样禁止员工间接向他人提供上述福利。员工不得指示、授权或允许第三方代表员工提供贿赂, 且员工不得向该第三方支付该第三方知晓或有理由知晓为不正当款项的款项。</p>
<p>Facilitation Payments:</p>	<p>疏通费:</p>
<p>Our Company prohibits facilitation or 'grease' payments as these are</p>	<p>因疏通费或“通融”费属非法贿款, 本公司禁止该等行为。疏通费或“通融”费是向公职人员支</p>

<p>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.</p>	<p>付的小笔款项，目的通常在于确保或加快常规程序的处理。常规程序包括颁布许可、执照或其他政府文件；获得签证和工作许可证；提供诸如治安保护、邮递服务或安排检查等服务；或加快货物海关通关或放行。本禁止条款适用于所有员工和代表本公司行事的第三方。如员工不清楚某一款项是否构成疏通费，应要求相关官员或第三方出示正式书面收据确认该等款项的合法性再予以支付。</p>
<p>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, Chief Ethics, Compliance & Sustainability Officer and General Counsel as soon as you are able. Such payments must be accurately accounted for in the Company’s books and records.</p>	<p>如员工因害怕自身或其他员工的健康、人身安全或福利受到威胁而作出任何款项支付，即为敲诈支付。在此情况下，员工可作出支付但应尽快告知经理、副总裁、首席道德与合规官及公司法律总顾问或副法律总顾问。该等款项须准确记录到公司账簿内。</p>
<p>Business Gifts, Entertainment and Travel Expenses:</p>	<p><u>商务礼品、娱乐招待和差旅费：</u></p>
<p>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.</p>	<p>在本公司政策允许范围内及接收方的公司政策、礼品法及金钱限额范围内（如适用），本公司允许员工向接收方提供象征性商务礼品、娱乐招待或出差及食宿费用报销。</p>
<p>Further guidelines for these expenditures are included in the Global Policy for Gifts and Entertainment (GBL-POL-LGL006) and</p>	<p>欲进一步了解该等支出方面的指导原则，请参阅《公司礼物及娱乐招待全球政策》（GBL-POL-LGL006）和《公司外国官员招待全球程序》</p>

Global Procedure for Hosting Non-US Government Officials (GBL-PROC-LGL004).	(GBL-PROC-LGL004)。
Third Parties	<u>第三方</u>
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.	本政策禁止通过第三方代表本公司实施具有腐败性质的给予、承诺或付款行为。第三方的广义定义包括与本公司有商业往来的任何人或实体，且包括但不限于代理商、顾问公司、经销商、转售商、供应商和承包商等。
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. 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. In addition, contracts with third parties should, to the extent possible, include provisions to mitigate against the risk of potential illicit payments.	因商业交易支付予第三方的全部款项必须正当、合法、合理，且与第三方提供的货物或服务的价值相关。本公司员工有义务谨慎选择代表公司行事的第三方，并根据公司程序规定对该等第三方实施尽职调查。此外，应尽可能将降低潜在非法付款风险的条款纳入与第三方签订的合同中。
Record-Keeping	<u>记录</u>
The failure to maintain adequate books and financial records violates many countries' laws, including the U.S. FCPA, even where no bribery takes place. Every Company employee must comply with our internal controls, financial reporting, and document retention procedures to ensure that the Company can demonstrate its compliance with anti-bribery laws and regulations.	如未能保持恰当的账簿和财务记录，虽未发生任何贿赂行为，仍将导致违反多个国家的法律（包括《美国反海外腐败法》）。公司每位员工均须遵守公司的内部控制规定、财务申报规定和文件保存程序，以确保公司能证明其活动符合反贿赂法律法规的要求。
Penalties, Fines and Other Sanctions	<u>处罚、罚款和其他惩处</u>
Failure to comply with anti-bribery	未能遵守反贿赂法律可导致公司及公司员工受到

laws could lead to criminal and civil penalties for the Company and for Company employees personally. Even the appearance of misconduct can result in serious reputational damage to the Company. The Company can be barred from doing business with the Federal government if found guilty of misconduct.	刑事和民事处罚。即使出现不当行为，也会导致公司声誉严重受损。如相关机构发现本公司行为失当，将禁止本公司与联邦政府之间的业务往来。
REFERENCES	参考文件
The Oshkosh Way	豪士科风格 (The Oshkosh Way)
GBL-POL-LGL006 - Gifts and Entertainment	GBL-POL-LGL006 - 礼品和娱乐招待
GBL-PROC-LGL004 - Hosting Non-US Government Officials	GBL-PROC-LGL 004 - 招待外国官员
CONTACTS	联系人
Kevin Tubbs, Vice President, Chief Ethics, Compliance & Sustainability Officer, x22592	Kevin Tubbs, 副总裁兼首席道德与合规官, x22592
Amy Thiel, Director, Global Ethics & Compliance, x25127	Amy Thiel, 全球道德与合规主管, x25127
REVISION	修订
Revision	修订
Description of Change	修改情况
Revised By	修订人
1.0	1.0
Updated to New Format	已更新为新格式
Global Ethics and Compliance	全球道德与合规部门
2.0	2.0
Updated policy and procedure references	已更新的政策和程序参考文件
Global Ethics and Compliance	全球道德与合规部门