

Whirlpool UK Appliances Limited

Modern Slavery and Human Trafficking Statement

For Financial Year end December 2022

Who We Are

Whirlpool UK Appliances Ltd (“Whirlpool UK”) is a subsidiary of Whirlpool located in Benton Harbor, Michigan, USA. Whirlpool (NYSE: WHR) is committed to being the best global kitchen and laundry company, in constant pursuit of improving life at home. In an increasingly digital world, the company is driving purposeful innovation to meet the evolving needs of consumers through its iconic brand portfolio, including *Whirlpool, KitchenAid, Maytag, Consul, Brastemp, Amana, Bauknecht, JennAir, Indesit, Yummly and InSinkErator*. For more than 111 years, improving life at home has always been at the heart of our business, with approximately \$20 billion in annual sales, 61,000 employees and 54 manufacturing and technology research centres in 2022. Additional information about the company can be found at [WhirlpoolCorp.com](https://www.WhirlpoolCorp.com). The term “Whirlpool” as used in this statement refers collectively to Whirlpool and its subsidiaries including Whirlpool UK.

At Whirlpool, our values are the driving force behind everything we do. There is a clear focus on driving a culture deeply rooted in Our Enduring Values - respect, integrity, inclusion and diversity, One Whirlpool and the spirit of winning, which propel our teams to excellence. We remain resolutely determined to do the right things the right way and have a steadfast commitment to sound corporate governance and ethics. Having a strong purpose behind everything we do keeps our people, products, and services focused on improving lives. Additionally, we are dedicated to improving the quality of life for all who reside in the communities in which we operate.



In the UK, we are Whirlpool UK Appliances Limited (“Whirlpool UK”) and operate the Whirlpool, Indesit and Hotpoint brands with over half a billion GBP in annual sales employing 2,500 employees. Whirlpool UK remains committed to the goals, ambitions and values of Whirlpool and takes active measures in our journey of continuous improvement.

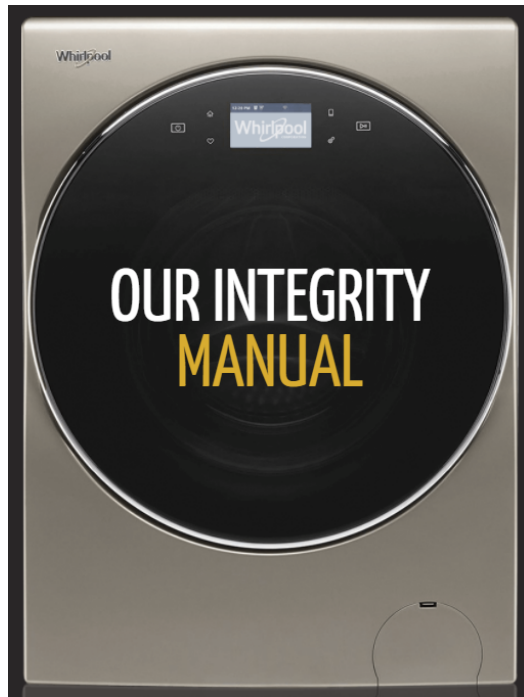
*Whirlpool ownership of the Hotpoint brand in EMEA and Asia Pacific regions is not affiliated with the *Hotpoint* brand in the Americas

What We Stand For

Our vision is to be the world’s best kitchen and laundry company, in constant pursuit of improving life at home. We are committed to creating value through the highest standards of ethical and legal conduct while operating sustainably to create shareholder value over the long-term. Our Board of Directors, sound corporate governance structure, and values-driven integrity culture support us in delivering on this commitment.

At Whirlpool, we abide by our commitments. Even before Whirlpool’s formal adherence to the UN Global Compact, Whirlpool UK has independently taken strides to advance its operations in the four main areas overseen by the UN Global Compact –including environment, anti-corruption, labour and human rights.

“There is no right way to do a wrong thing” guides our business and operating principles. We’re committed to the highest standards of ethical and legal conduct and have created an environment where open and honest communications are the expectation, not the exception. We hold ourselves accountable and maintain robust policies, procedures and systems to ensure we live by our values.



The Modern Slavery Act 2015 was introduced by the UK government to address slavery and human trafficking. Modern slavery can occur in various forms including servitude, forced or compulsory labour and human trafficking and can affect children and adults (“Modern Slavery”). The urgent need to tackle Modern Slavery has also received attention at a global level with an increased focus at international summits including the G7 and G20. The International Labour Organisation's 2014 Forced Labour Protocol reinforces the international legal framework for combating all forms of forced labour and has been ratified by 59 countries, including the UK.

At Whirlpool, we have implemented a robust program to achieve our commitments in this space. The purpose of this statement is to provide an overview of the choices and investments we have made and our policies and controls that help to address the risks of Modern Slavery in our supply chain and organisation.

Our Supply Chain

We Expect our Suppliers to conduct business ethically. We hold ourselves to high standards, and we expect our suppliers and third parties acting on behalf of Whirlpool to do business the right way as well.



At Whirlpool, we are committed to Winning with Integrity, and we extend this principle to not only our employees, but also to those who we do business with.

Our Responsible Sourcing programs help us look at what we purchase beyond the more traditional aspects of cost, quality and delivery. This means we consider ethics, labour rights and social and environmental issues when sourcing products and services across all purchasing categories and regions. Our global goal is to minimise negative impacts and make a positive contribution to the businesses, people and communities we support through ethical purchasing practices. This program is managed by a team of global procurement professionals working in collaboration with our ESG Task Force, legal, ethics and compliance, sustainability, global product organisation and inclusion and diversity teams.

Within our Responsible Sourcing program, one of the pillars is focused on driving a strong compliance program.

Supplier Code of Conduct

Whirlpool is committed to preventing human rights abuses in its operations and supply chain. In selecting suppliers, Whirlpool seeks to do business with reputable business partners who are committed to ethical standards and business practices compatible with those of Whirlpool.

We recognise that our suppliers are key to our success and to maintaining the high standards and reputation of our brands. We, therefore, require all of our global suppliers not only to be technically qualified, but also to commit to our ethical standards and business practices. Our [Supplier Code of Conduct \(SCoC\)](#) formalises the key principles under which suppliers to Whirlpool are required to operate. This SCoC applies to all suppliers of Whirlpool including all the Whirlpool suppliers' facilities.

We not only require all of our suppliers to abide by the SCoC but we strongly encourage suppliers to exceed the requirements of this SCoC and promote best practices and continuous improvement throughout their operations. We also require our global suppliers to have and maintain practices similar to those in Whirlpool's Integrity Manual. We also expect suppliers to ensure that their suppliers, service providers and extended networks have ethical and business practices that are similar to Whirlpool's practices.

Whirlpool supports the human rights of everyone we work with, and we expect our global suppliers to do the same. One tenet of our SCoC is that Whirlpool suppliers must recognize and respect human rights, including any rights of workers to exercise lawful rights of free association, compliance with local and international laws regarding young workers, compliance with laws prohibiting human trafficking in any form (e.g., forced labor, debt bonded slavery), providing safe and healthy work environments, and respecting any legal right of workers to bargain collectively. Under the SCoC, all suppliers are also prohibited from using any type of involuntary or forced labour or any harsh or inhumane treatment. Other areas covered are related to business ethics, labour management, health and safety, environmental practices, governance and compliance.



Where there is no local legal requirement, or if a local legal requirement is not as strict as the requirement included in the SCoC, suppliers are required to follow the requirements in the SCoC. In exceptional cases where the supplier is unable to accept Whirlpool's SCoC due to its own policy/code of Conduct, Whirlpool will conduct an analysis of the Supplier's comparative Code of Conduct to ensure it does not materially differ. If both Codes align, parties will sign an agreement to confirm that they will each work in compliance with their own code. If a Supplier refused to sign the mutual recognition, Whirlpool will not conduct business with them.

Our SCoC formalises Whirlpool's practices and whilst recognising differences in cultures and legal requirements, makes clear that we expect that wherever our suppliers are located, producing products for us, producing components that we use in our products, and wherever services are performed for us, that they are produced and/or provided in a manner compatible with the high standards that contribute to the outstanding reputation of Whirlpool and our brands.

Audits & Corrective Action Plan

We also have a robust global supplier auditing program to ensure compliance with our SCoC policy, which is mandatory for all new suppliers who must go through an on-site audit by our third party auditor prior to being selected for conducting business with Whirlpool. Our existing suppliers are also audited by our third party auditor following the application of a risk-based criteria. In 2022 we conducted 310 Supplier Audits in 19 countries.

As part of the audit, our auditors check for activities related to forced labour per our SCoC audit manual, including, but not limited to:

- Suppliers must have a written policy against forced labour that complies and implements the code, applicable laws and regulations.
- All workers in the facility must be voluntarily employed.
- Workers must be able to voluntarily end their employment without any restriction, provided that they give reasonable notice to their organisation.
- No supplier may hold a worker's original government-issued identification or travel documents.
- Suppliers shall not confine or restrict workers' freedom of movement inside the place of production or supplier-provided facilities, including access to drinking water, restrooms and the worker's dormitory room, except where necessary for worker safety and permitted by applicable laws and regulations.

All suppliers who undergo audits work with our third-party auditors to create and align on a Corrective Action Plan (CAP). Suppliers must provide evidence of resolving the CAP. Our auditors are also assigned to follow up on all audits that were completed to verify that the findings were closed to ensure continuous improvement in our processes. We had 25 remedial re-audits in 2022, out of which all 25 suppliers have approved CAPs and are working on closing the action items.

Any new supplier who does not pass the audit is not awarded the business and any existing supplier who scores poorly on the audit is put on new business hold and must pass the re-audit before business can continue.

Training

We conduct annual training for suppliers in scope to ensure clear understanding of our SCoC and audit actions to ensure compliance. In 2022, we also conducted global training for all our procurement employees to ensure they were aware of the expectations and requirements of the SCoC and work proactively with suppliers to ensure any risks are identified and mitigated proactively, where possible.

Other Actions

We strongly respect and promote human rights along our value chain, adhering to the Ten Principles of the United Nations Global Compact. We are committed to preventing, mitigating and addressing any adverse impact of our operations and supply chain through a due diligence-based approach.

We have a proud history of implementing policies and processes that support the tenets of the UN Global Compact for many years in our plants, offices and other facilities around the world. Every year we take steps in our journey of continuous improvement and we remain committed to being a participant in the UN Global Compact as we continue to expand our efforts to uphold sustainable and responsible business practices in our day-to-day global operations.



In addition to supporting and taking action to match the ten principles of the [UN Global Compact](#), Whirlpool has pushed to further the UN's broader development goals, including the United Nations Sustainable Development Goals (SDGs), which are a call for action by all countries to promote prosperity while protecting the planet. Whirlpool shares these goals as we continuously aim to improve our products, our business and our operations to benefit our employees, consumers, suppliers, customers and communities by building a better workplace, business and world. Whirlpool has prioritised a number of these SDG goals in accordance with ESG strategic goals, some of which include:



Whirlpool utilises a cross-functional team led by Global Strategic Sourcing (procurement) and consisting of Legal, Ethics and Compliance, and Government Affairs to help identify, review, analyse and respond to any issues of forced or compulsory labour, including, but not limited to, monitoring multiple public websites, periodicals and reports that may identify forced labour violations or issues. Additionally, Whirlpool utilises a Global Third-party Due Diligence Program that identifies forced or compulsory labour violations, claims or past conduct against new and current suppliers. Based on due diligence findings, Whirlpool can respond appropriately to forced or compulsory labour issues and risks. Material failures to comply with our SCoC may result in the termination of our relationship with a supplier.

In 2022, as a result of Whirlpool’s global SCoC audits, seven incidents of moderate labour risk were identified. All seven of these suppliers have corrected the findings by updating procedures and remedial audits. Our goal is to minimise negative impacts and make a positive contribution to the businesses, people, and communities we support.



Additionally, within our operations, we implemented enhanced measures to combat Modern Slavery:

- ❑ **Integrity Manual** - all Whirlpool employees globally are subject to Whirlpool’s [Integrity Manual](#) (code of ethics), which translates our integrity into action and empowers employees to lead with integrity. The manual is regularly updated with a

dedicated section on how to work with suppliers and to address ethical issues in an ever changing environment.

- ❑ **Legal** - Our SCoC is incorporated by reference into our supply agreements, and contains the fundamental requirements we expect from our suppliers to continue a business relationship with us. Similarly, a contractual provision is also present in our standard terms and conditions for sale that allow us to terminate our agreements if the Supplier violates our SCoC.
- ❑ **Recruitment** - We firmly stand against abuse and discrimination in our workplace and ensure compliance with all applicable laws and regulations.
- ❑ **Ethics & Compliance** - Whirlpool's Global Ethics and Compliance Program is focused on enhancing and sustaining our culture of winning with integrity, empowering employees with tools and resources to act with integrity, within a risk-based framework. The existence of a Global Ethics and Compliance Steering Committee who provide strategic direction to our Global Ethics and Compliance Team is reflective of our commitment to winning with integrity. A critical component of our Global Ethics and Compliance Program are risk-based ethics and compliance communications and training, including annual training on all of the principles in Our Integrity Manual. This training, where employees certify that they have reviewed and understand Our Integrity Manual, was delivered to 57,000 employees as part of the Integrity Manual launch in 2019, and 20,933 employees in 2020, and 19,570 employees in 2021, and 18,124 employees in 2022, through refresher trainings, including 100% participation by employees in high risk roles or functions.

In 2022, we delivered Global Integrity Week, during which our teams delivered targeted training events over one week in July on our most critical risk areas and to our high-risk roles. This involved holding 30 sessions in a variety of formats ranging from learning bursts and shorter online training sessions to interactive in-person discussions with more than 9,000 employees across 45 countries participating, including those in leadership roles.

We encourage our employees to ask questions and voice concerns. As stated in Our Integrity Manual, speaking up and listening up is the responsibility of all of us. Our integrity channels serve as resources our employees can use to ask questions or raise a concern. Through our integrity channels, including [Our Integrity Line](#), or hotline, we ensure that our employees will be listened to and heard.

Whirlpool UK is committed to continuing to develop and improve its approach to mitigate the risks of Modern Slavery and remain reactive to address risks as they evolve.



James Goldsmith
Managing Director
Whirlpool UK Appliances Ltd
Date: 13th June 2023

This Modern Slavery Statement was approved by the Board of Directors of Whirlpool UK Appliances Ltd on 12 June 2023