

Whirlpool UK Appliances Limited

Modern Slavery and Human Trafficking Statement

Who We Are

Whirlpool UK is a subsidiary of Whirlpool (“Whirlpool”) located in Benton Harbor, Michigan, USA. Whirlpool (NYSE: WHR) is the world’s leading kitchen and laundry appliance company, with approximately \$19 billion in annual sales, 78,000 employees and 57 manufacturing and technology research centers in 2020. The company markets *Whirlpool*, *Hotpoint**, *KitchenAid*, *Maytag*, *Consul*, *Brastemp*, *Amana*, *Bauknecht*, *JennAir*, *Indesit* and other major brand names in nearly every country throughout the world.


At Whirlpool, our values are the driving force behind everything we do. Respect, integrity, inclusion and diversity, teamwork and the spirit of winning propel our teams to excellence. We funnel these values into creating the best consumer appliances, but we also bring them to how we think about the world around us. Having a strong purpose behind everything we do keeps our people, products, and services focused on improving lives. 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.



In the UK, we are Whirlpool UK Appliances Limited (“Whirlpool UK”) and operate the Whirlpool, Indesit and Hotpoint brands with approximately \$700 million in annual sales employing 2,500 employees. Whirlpool UK remains committed to the goals and ambitions 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

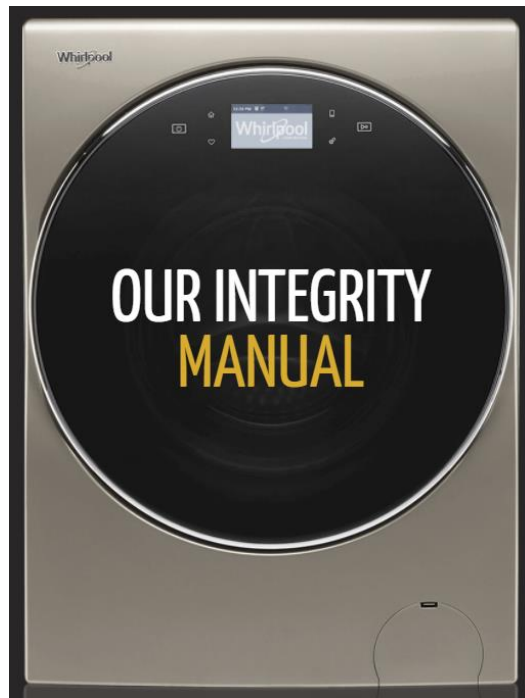
What We Stand For



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, labor 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.



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 Organization's 2014 Forced Labour Protocol reinforces the international legal framework for combating all forms of forced labour and has been ratified by 42 member states, including the UK.

At Whirlpool, we took the view that this is an urgent call to action and 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 our policies and controls that help secure our supply chain from Modern Slavery.

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.



Whirlpool is committed to preventing human rights abuses in its operations and supply chain. We recognise that our suppliers are key to our success and to maintaining the high standards and reputation of our brands. We, therefore, require our suppliers not only to be technically qualified, but also to commit to our ethical standards and business practices. Our [Supplier Code of Conduct \(SCoC\)](#) outlines the standards required to conduct business with Whirlpool, including Whirlpool UK. We require all of our suppliers to abide by the SCoC.

The SCoC states, amongst others, that 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.

This includes the prohibition against the use of any type of involuntary or forced labor. 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. Any breaches of the SCoC are unacceptable.

Our SCoC formalizes Whirlpool's practices and makes clear that, recognizing differences in cultures and legal requirements, 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.

Our 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.

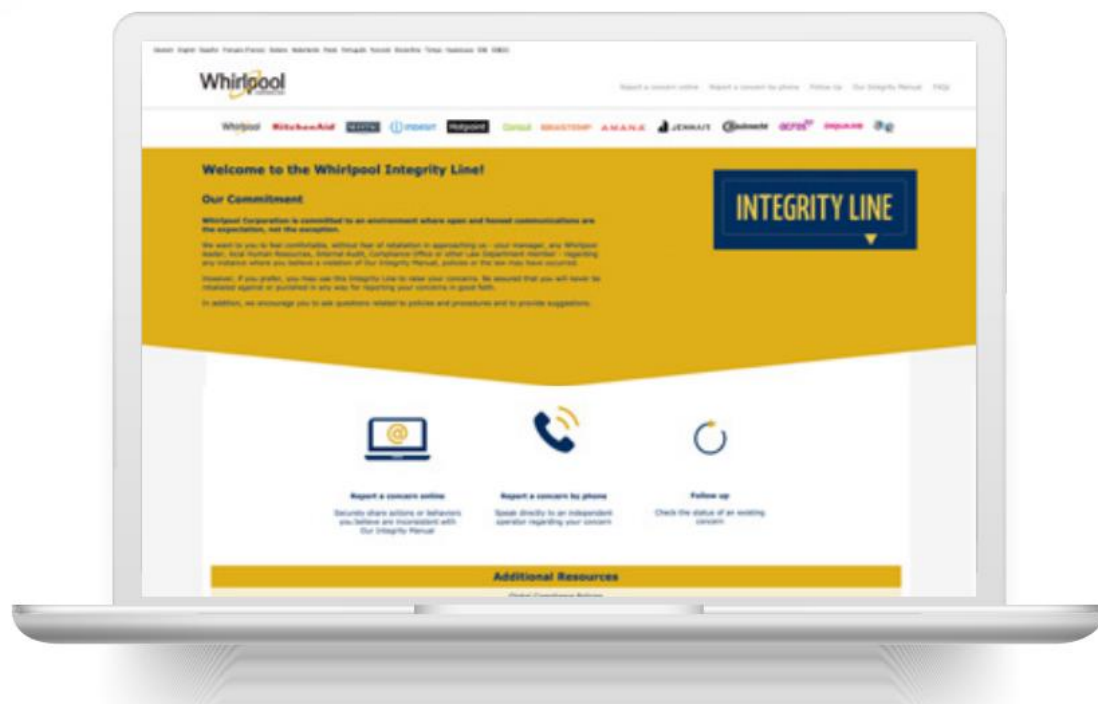


For example, in 2019 we established a global dedicated team with the main focus on driving our responsible sourcing program that considers ethics, labor rights, and social and environmental issues when sourcing products and services across all purchasing categories and regions. Our goal is to minimize negative impacts and make a positive contribution to the businesses, people, and communities we support.

We also implemented a robust supplier auditing program, which is mandatory for all new suppliers, and risk-based on-site audits for existing suppliers through a trusted third party. For example, in 2020 we carried out audits of some suppliers from China that were new within our supply chain environment. One hundred percent of suppliers that were found to have a

high risk audit result implemented a corrective action plan. In certain circumstances, follow up audits were conducted to verify that the findings were closed.

If we identify any breaches of our SCoC or applicable laws, we immediately require the implementation of a corrective action plan. Material failures to comply with our SCoC may result in the termination of our relationship with a supplier, as may be permitted by applicable law. In order to ensure our suppliers are meeting our standard of integrity, we continue to conduct independent audits of our suppliers' practices.



In 2020, we formalized [our commitment to the U.N. Global Compact](#). As a participant of this globally-recognized initiative, Whirlpool (which includes Whirlpool UK) continues to expand its efforts to uphold sustainable and responsible business practices in day-to-day global operations. In addition to supporting and taking action to match the ten principles of the [UN Global Compact](#), Whirlpool will push to further the UN's broader development goals, including the Sustainable Development Goals, which idealize fundamental, impactful change in areas ranging from hunger and poverty to clean energy and gender equality.

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

- ❑ **Integrity Manual** - all Whirlpool UK employees are subject to Whirlpool's [Integrity Manual](#), which details Whirlpool's policies such as the Diversity and Equal Opportunity policy and the Environmental, Health and Safety policy. 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. In 2020, we refreshed our commitment and sent to all suppliers our revised Global Supplier Code of Conduct. Similarly, a contractual provision is also present in our standard terms and conditions for sale that allow us to take legal action in the event we discover any forms of Modern Slavery within our downstream activities.
- ❑ **Recruitment** - We firmly stand against abuse and discrimination in our workplace and ensure compliance with all applicable laws and regulations. We also regularly conduct internal checks to prevent Modern Slavery in the workforce.
- ❑ **Compliance Team** - Whirlpool has a dedicated global compliance team, which oversees the enforcement of the Integrity Manual, Global Compliance Policies and the Global Supplier Code of Conduct and encourages reporting of suspected non-compliance. Whirlpool employees are provided with multiple internal and external channels to report any violation of Whirlpool policy or law, including [Whirlpool Integrity Line](http://www.whirlpoolintegrityline.com) (www.whirlpoolintegrityline.com).
- ❑ **Training** - We established e-learning courses for our sourcing professionals to educate them on the requirements of our Supplier Code of Conduct. Where appropriate, we also provide online training to our suppliers.

Whirlpool UK recognises that the threat from Modern Slavery is ever present. We, therefore, regularly monitor our supply chain, and our own operations, to identify such threats in advance and neutralise them before they manifest.

April 2021

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Andrzej Tuleja
Managing Director
Whirlpool UK Appliances Ltd