

Whirlpool UK Appliances Limited Modern Slavery and Human Trafficking Statement For Financial Year end December 2023

Who We Are

Whirlpool UK Appliances Ltd (“Whirlpool UK”)* up to April 1st 2024 was a subsidiary of Whirlpool Corporation located in Benton Harbor, Michigan, USA.

In January 2023, Whirlpool Corporation (“Whirlpool”) and Arçelik A.Ş. (“Arçelik”) entered into a Contribution Agreement to contribute Whirlpool’s European major appliance business, and Arçelik’s major domestic appliance, consumer electronics, air conditioning and small domestic appliance businesses (“Agreement”) into a newly formed European appliance company, Beko Europe B.V. (“Beko Europe”).

Following the fulfilment of the closing conditions stipulated in the Agreement, on April 1 st, 2024, the entire share capital of Whirlpool Europe Holding BV (“Whirlpool Europe”) which owns all production, sales, and marketing subsidiaries of Whirlpool in Europe, including Whirlpool UK, was transferred by way of in-kind capital contribution to Beko Europe in which 75% of share capital owned by Beko B.V., a direct subsidiary of Arçelik A.Ş, and 25% owned by Whirlpool.

The following Statement relates to the year of 2023 and the details provided are connected with the organisation in place for that period of time. Therefore, the term “Whirlpool” as used in this statement refers collectively to Whirlpool Corporation and its subsidiaries organised under its business structure prior to the 2024 closing, and it includes Whirlpool UK legal entity.

Whirlpool UK operate the Whirlpool, Indesit and Hotpoint** brands with over half a billion GBP in annual sales and employing 2,500 employees.

*From 1 July 2024, Whirlpool UK Appliances Limited will change the name to HotpointUK Appliances Limited.

**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

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 sound corporate governance structure, and values-driven integrity culture support us in delivering on this commitment.

*United Nations Global Compact: <https://unglobalcompact.org/>

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.

The purpose of this statement is to provide an overview of the choices and investments made in the previous year and the policies and controls that were in place in order to address the risks of Modern Slavery in Whirlpool UK's 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.



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

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. Whirlpool UK's [Supplier Code of Conduct \(SCoC\)](#) 2023 formalised the key principles under which suppliers to Whirlpool were required to operate. This SCoC applies to all suppliers of Whirlpool UK including all the Whirlpool UK 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 labour, 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 were 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.

In 2023, the SCoC was an important resource used to formalising Whirlpool's practices whilst recognising differences in cultures and legal requirements, making it clear to suppliers that we expected that wherever our suppliers were located, producing products for us, producing components that we used in our products, and wherever services were performed for us, that they were produced and/or provided in a manner compatible with the high standards that contribute to the outstanding reputation of Whirlpool and its 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 2023 we conducted 96 Supplier Audits in 13 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.

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.

Whirlpool Corporation undertook diligence efforts (as further described in this Report) on behalf of Whirlpool UK to ensure that the risk of forced labour and child labour is mitigated in our business. In the event that we discover any actual or potential forced labour or child labour in our business and supply chains, we will investigate and remediate those circumstances promptly.

Our approach is to prevent any presence of forced labour situations in the supply chain through robust due diligence activities during supplier onboarding and continuous monitoring of vendors. By conducting regular compliance screenings of our suppliers and onsite inspections of their facilities, we ensure that workers are treated fairly and suppliers uphold our stringent ethical standards. We will not engage with a new supplier or hesitate to terminate an existing supplier that does not meet our high standards and expectations.

Awareness and Internal Controls

In 2023, Whirlpool UK ensured that its suppliers adhered to the company's Values, Supplier Code of Conduct and applicable laws. In addition, as a global company, we conduct annual audit actions and assessments on suppliers in scope to ensure clear understanding of our SCoC and commitment to doing business the right way. In 2023, we also conducted global training for all our procurement employees to ensure they were aware of the expectations and requirements relating to the SCoC, and worked proactively with suppliers to ensure any potential risks were identified and mitigated proactively.

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.

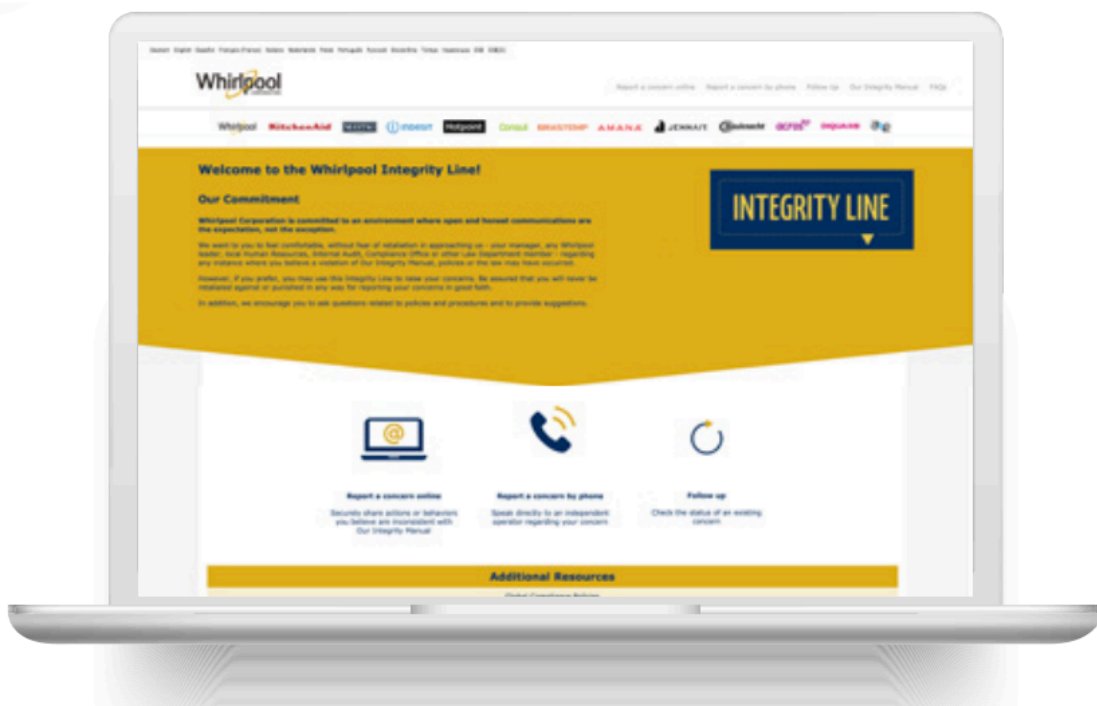


In addition to supporting and taking action to match the ten principles of the [UN Global Compact](#), Whirlpool has pushed to further the UN's broader development goals, including the United Nations Sustainable Development Goals (SDGs), which are a call for action by all countries to promote prosperity 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 could respond appropriately to forced or compulsory labour issues and risks. Material failures to comply with our SCoC would result in the termination of our relationship with a supplier.

In 2023 as a result of Whirlpool’s global SCoC audits, minor incidents of moderate labour risk were identified. All 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](#) (f.k.a Code of Ethics), which translates the company’s integrity into action and empowers employees to lead with integrity. The manual was regularly updated with a dedicated section on how to work with suppliers and to address ethical issues in an ever changing environment.

- ❑ **Legal** - The SCoC was incorporated by reference into the supply agreements, and contained the fundamental requirements expected from suppliers to continue a business relationship with Whirlpool UK. Similarly, a contractual provision was also present in our standard terms and conditions for sale that allowed us to terminate our agreements if the Supplier violated our SCoC.
- ❑ **Recruitment** - Whirlpool UK firmly stood against abuse and discrimination in the workplace and ensured compliance with all applicable laws and regulations.
- ❑ **Ethics & Compliance** - Whirlpool UK's Ethics and Compliance Program is focused on enhancing and sustaining its culture of winning with integrity, empowering its employees with tools and resources to act with integrity, within a risk-based framework. A critical component of our Ethics and Compliance Program is risk-based ethics and compliance communications and training, including annual training on all of the principles in Our Integrity Manual. This training, where employees certified that they reviewed and understood the Integrity Manual, was delivered to 57,000 employees globally 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 2023 the Training was delivered to 15,405 employees.

In 2023, Whirlpool UK delivered the Integrity Quarter, as part of a Whirlpool's global initiative, during which various ethics and compliance events were held with the participation of the company's Executive Committee members, senior leadership, in addition to interactive in-person discussions, micro-learning videos, articles and online targeted trainings that were made available to employees from May to July 2023, covering relevant risk areas and to 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.

Whirlpool UK encourages its employees to ask questions and voice concerns. As stated in the Integrity Manual, speaking up and listening up is the responsibility of all employees. The company's integrity channels serve as resources to our employees for asking questions or raising concerns non-anonymously or anonymously through the company's various Integrity Channels listed in its [Integrity Manual](#).

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: 27th June 2024

This Modern Slavery Statement was approved by the Board of Directors of Whirlpool UK Appliances Ltd on 27 June 2024