



The California Transparency in Supply Chains Act

At Whirlpool Corporation, we support human rights in everything we do, and our business practices reflect our commitment to ensure every person who works for us throughout all of our global operations does so of their own free will, in a safe and healthy environment. Whirlpool supports the human rights of everyone we work with, and expects our global suppliers to do the same.

Whirlpool's commitment to human rights is based on the United Nations Global Compact principles, which are derived, in pertinent part, from the Universal Declaration on Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Our commitment to human rights is also woven throughout [Our Integrity Manual](#), [Supplier Code of Conduct](#) ("SCoC"), and various other employee policies and procedures including our [Global Human Rights Policy](#).

As part of our commitment to human rights, Whirlpool complies with all applicable laws in the countries and jurisdictions in which we operate. When Our Integrity Manual requires a higher standard, we will follow that standard.

Certification

All Whirlpool direct suppliers are contractually obligated to comply with Whirlpool's SCoC in addition to applicable laws related to forced labor and human trafficking. Among other things, the SCoC prohibits Whirlpool suppliers from using any type of involuntary or forced labor; including, among other things, slave labor or business practices which in any way rely on, or encourage, human trafficking. Failure to comply with the SCoC may result in termination of Whirlpool's business relationship with the supplier.

Auditing

Utilizing the services of an independent, third party auditor, Whirlpool conducts both announced and unannounced audits of its suppliers using a risk-based methodology. Suppliers must provide access to Whirlpool and its third party auditors full access to their facilities, documents, worker records, and workers themselves for confidential interviews in compliance with applicable law. All corrective actions identified by Whirlpool must be promptly remediated by the affected supplier. Material failures identified as a part of an audit or the failure to remediate an

identified issue may result in termination of the relationship by Whirlpool. In 2023, Whirlpool conducted over 250 SCoC audits. For additional information, please refer to our [2023 Sustainability Report](#).

Verification

As part of supplier onboarding, we audit 100% of our new components and finished good suppliers. Additionally, we screen 100% of our existing, new and potential suppliers for a number of risk factors including potential red flags related to slavery and human trafficking. In 2023, we conducted more than 3,000 supplier due diligence screenings.

Internal Accountability

Whirlpool expects all employees and suppliers to comply with applicable laws and regulations in the countries and jurisdictions in which we operate. Where our internal policies and procedures, including [Our Integrity Manual](#), require a higher standard, we will follow that standard to the extent permitted by law. Failure to comply with our policies and procedures may result in employment action or termination of a supplier relationship.

Our supplier audit program described above is a critical component in maintaining compliance with company expectations on slavery and trafficking as detailed in the [SCoC](#). Additionally, Whirlpool provides all employees and suppliers with access to a free and confidential [Integrity Line](#) that can be utilized to report potential violations of our policies and procedures. Such reports are investigated promptly by appropriately trained resources.

Training

Whirlpool offers a variety of training courses to its employees throughout the year. These trainings cover a variety of topics including trafficking and slavery. Additionally, employees are required annually to certify their compliance with Whirlpool's Integrity Manual, which as noted, contains provisions related to Whirlpool's commitment to human rights and the prevention of forced labor and human trafficking.

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