



GLOBAL POLICY

GIFTS AND ENTERTAINMENT

Whirlpool Corporation (“Whirlpool”) is committed to our values and our duty to fair, ethical, and lawful business relationships. We award and earn business solely on the basis of commercial considerations such as value, quality, services, and competitive pricing. Gifts, entertainment, and other special favors are not, and will not become, conditions for doing business with Whirlpool and shall never influence, or appear to influence, an employee’s ability to make impartial business decisions in the best interest of Whirlpool. This Global Gifts and Entertainment Policy applies to all Whirlpool employees, subsidiaries, and locations where Whirlpool conducts business.

In all circumstances, gifts and entertainment must be reasonable, appropriate¹, serve a legitimate business purpose, and must not create the appearance of impropriety. Additionally, employees should not request, accept, or give, directly or indirectly, gifts and/or entertainment (including meals) that (i) violates the below standards, (ii) improperly influences (or attempts to improperly influence) business decisions, or (iii) when they know, or have reason to know, would violate the recipient’s own company policies or the law.

RECEIVING AND GIVING GIFTS AND ENTERTAINMENT

	Receiving	Giving
Gifts	<u>Generally not acceptable</u>	Acceptable <\$50USD, or Whirlpool branded product or merchandise ²
Cash/Cash Equivalents	Not acceptable	Cash: Not acceptable Cash Equivalents (gift cards, rebates, credits): Acceptable as part of pre-approved Whirlpool program
Entertainment	Requires written pre-approval from direct manager	Acceptable (within regionally or functionally defined limits)
Meals	Acceptable (within reason)	Acceptable (within regionally or functionally defined limits)
Government Officials	Requires written pre-approval from Global Compliance	Requires written pre-approval from Global Compliance

¹ For purposes of this policy, and regardless of pre-approval or circumstance, Whirlpool employees shall not participate in any entertainment that involves illegal activity, nudity, sexual activity, the exploitation of others, illegal use of or abuse of alcohol and/or drugs, violence, and/or otherwise inconsistent with Whirlpool values.

² Gifts valued above \$50USD that are not Whirlpool branded product or merchandise require written pre-approval by a member of the Executive Committee.

What to do when circumstances arise or it's difficult to know what to do:

- **When Unsolicited Items Arrive (e.g., perishables, trade/reference materials or books, marketing/promotional materials)** - An employee will not be in violation of this policy for receiving a gift that is sent to him/her if the employee did not know it was being sent and had no opportunity to decline. In these situations, the employee must follow the Gift Registry Process.
- **When Refusal Is Inappropriate (e.g., public events, networking events, cocktail parties)** - In the rare situations when refusing a gift would be culturally, publically, or professionally inappropriate (such as a symbolic gift given to you in front of a large audience), the employee can accept. If accepting a gift, the employee must accept the gift only on behalf of Whirlpool (e.g., "Thank you for the _____; I accept this on behalf of Whirlpool Corporation and our [insert business unit name, or team]"). In these situations, the employee must follow the Gift Registry Process as soon as possible.
- **When You Receive Services for Free as Business Development (e.g., lunch & learns, consulting meetings, product demonstrations)** - An employee will not be in violation of this policy for participating in a free educational, training, or consulting session with a supplier.

REGION OR BUSINESS UNIT AUTHORITY

Nothing in this policy shall preclude any region or business unit from adopting more stringent guidelines for the implementation of this Gifts and Entertainment Policy as deemed appropriate.

GIFTS AND ENTERTAINMENT GUIDELINES

Please reference the [Gifts & Entertainment Guidelines](#) for definitions of key terms, more information, and additional registration and approval procedures.

GIFT REGISTRY PROCESS

As applicable, Whirlpool employees must follow the Regional Gift Registry Process, which requires an employee to:

- **register gifts with his/her [regional gift registry](#);**
- **immediately notify his/her manager in writing (email is acceptable); and**
- **except as described in the Whirlpool Gifts and Entertainment Guidelines, seek instruction from Global Compliance as to how to handle/dispose of the gift**

POLICIES NOT REFERENCED

Please note that this Policy does not address Charitable Contributions or Whirlpool Corporate Programs. Please see the [Gifts and Entertainment Guidelines](#) for more detail and guidance.

Whirlpool Corporation will review the Gifts and Entertainment policy periodically to ensure its continued applicability, effectiveness and alignment with the Whirlpool Integrity Manual. Failure to comply with this policy may result in appropriate disciplinary action, up to and including termination of employment.