

WHIRLPOOL CORPORATION CORPORATE DISCLOSURE POLICY

Introduction

The primary purpose of this Policy is to ensure compliance with applicable laws, including Regulation FD (Fair Disclosure) as adopted by the U.S. Securities and Exchange Commission.

Authorized Spokespersons

Only the following individuals are authorized to communicate with the investment community:

- Chairman of the Board;
- Chief Executive Officer;
- Chief Financial Officer;
- Chief Operating Officer;
- Senior Director and Director of Investor Relations; and
- Anyone else specifically authorized by the Chairman, CEO and/or CFO.

Quiet Period

The Company observes a quiet period beginning 15 calendar days prior to quarter end and ending at the time of the earnings release for that quarter. During a quiet period, there should be no formal or informal business discussions with any members of the investment community, including by Authorized Spokespersons. Rarely, the Company may make exceptions in its discretion because of the need to discuss breaking news or events. In such cases, the Company will issue a broad-based public disclosure of any material information prior to any such discussions.

Quarterly Earnings

The Company holds a research analyst and investor conference call related to the release of quarterly financial information, which is broadcast. The Company will provide advance notice about the call by issuing a press release at least several days in advance of the call. Before the call, the Company will furnish its earnings press release to the SEC on a Form 8-K. An audio playback of the call and presentation materials will be hosted on the Company's website for at least 12 months.

Guidance

Financial guidance regarding projected results for the current fiscal year may be provided in the fiscal year-end earnings press release and modifications to such guidance may be provided in each subsequent quarter's earnings press release, if necessary. Generally, the Company will not update this guidance or provide additional guidance during the quarter, except as deemed necessary by the CEO, and then only in accordance with Regulation FD. Management and Investor Relations will not comment privately on a prior public statement about guidance other than to refer to the last time guidance was publicly given.

Analyst Reports

The Company will not comment or provide feedback on analyst reports, except to correct mathematical errors or other errors that can be rectified by referring to publicly available, historical, factual information. No other feedback or guidance on earnings models may be communicated with an analyst.

Market Rumors

The Company will not respond to or comment on market rumors. Should the NYSE request that the Company make a definitive statement in response to a market rumor, the CEO will determine whether to issue a statement.