

KitchenAid Europa, Inc.
Modern Slavery Act 2015: Statement
Fiscal year ended 31 December 2023

Organisation and supply chains

KitchenAid Europa, Inc. ("KitchenAid") is a subsidiary of Whirlpool Corporation, an American public company listed on the New York Stock Exchange (NYSE: WHR) and headquartered in Benton Harbor, Michigan, USA. Since the introduction of its legendary stand mixer in 1919, KitchenAid has built on the legacy of these icons to create a complete line of products designed for those with a passion to make. Today, the KitchenAid® brand offers virtually every essential for the well-equipped kitchen with a collection that includes everything from countertop appliances to cookware.

As a subsidiary of Whirlpool Corporation, KitchenAid has adopted Whirlpool Corporation's due diligence policies and practices described in this Statement. "We" and "our" may refer collectively to KitchenAid and/or to Whirlpool Corporation depending on the context.

Whirlpool Corporation has a comprehensive, globally applicable approach to mitigating the impact of modern slavery and human trafficking in its supply chain. Whirlpool Corporation applies and undertakes its policies, procedures, and processes described in this Statement to itself and its subsidiaries around the world, including KitchenAid. As part of Whirlpool Corporation, KitchenAid follows and reasonably relies upon Whirlpool Corporation's policies, including but not limited to its human rights, monitoring, auditing, and due diligence processes and policies, which Whirlpool Corporation implements globally across its supplier base and carries out on behalf of KitchenAid and other subsidiaries globally.

KitchenAid procures goods and services from a variety of direct suppliers, including Whirlpool Corporation. The suppliers we engage include businesses that supply our business with finished products that we sell to customers in the United Kingdom.

Policies in relation to slavery and human trafficking

Through Whirlpool Corporation's organizational and governance policies, we communicate our values and expectations, setting a high bar for ourselves and our suppliers, and make it

clear that we prohibit the use of forced labour or child labour. We are committed to consistently evolving and improving our approach. We take reasonable efforts, including through carrying out due diligence and audits to monitor the performance of our direct suppliers, to prevent our activities from having a negative impact on human rights. Our relevant policies are discussed in further detail below:

Supplier Code of Conduct ("Code"): We expect our suppliers to act responsibly in all respects and to ensure that no abusive, exploitative or illegal conditions exist in their supply chains. Our suppliers are expected to comply with all applicable laws and regulations, as well as the principles set out in the Code. One tenet of this Code is that our suppliers must not use any type of involuntary or forced labour; this prohibits, among other things, slave labour or business practices which in any way rely on, or encourage, human trafficking. Where there is no local legal requirement, or if a local legal requirement is not as strict as the requirement included in the Code, our suppliers are required to follow the requirement in the Code. Finally, our direct suppliers must ensure that their own suppliers, service providers, and extended networks have in place and comply with ethical and business practices that are similar to our Code.

Whirlpool Integrity Manual: We support human rights in everything we do. We respect freedom of association and personal political involvement. Our business practices reflect our commitment to ensure every person who works for Whirlpool Corporation and its subsidiaries, including KitchenAid, does so of his or her own free will, in a safe and healthy environment. We oppose discrimination, slavery, and child labour, and ensure we have controls and protections to avoid them. We support diversity and wage parity. We also respect the rights of our employees to associate with whom they choose and to be involved in politics outside of work. The Whirlpool Integrity Manual makes it clear that we:

- Forbid forced or child labour and comply with global human rights and local laws regarding labour, time, and wages.
- Hold our suppliers and business partners accountable to comply with these same principles through our Code.

Due diligence processes

KitchenAid expects the third parties with which we work to adhere to business principles and values similar to our own and to comply with all applicable laws and regulations. Before making any commitments towards third parties, we take steps to appropriately evaluate the relationship and mitigate any associated risks by carrying out risk-based due diligence and checks.

In order to mitigate this risk, we have adopted an audit program as described below.

Whirlpool Supplier Audit Compliance Program: We have a longstanding history of combating modern slavery in our supply chain through Whirlpool Corporation's well-established, intensive supplier audit program. As part of the onboarding process, all new direct suppliers must successfully pass a Supplier Code of Conduct audit (or equivalent) and third party due diligence ("TPDD") screening prior to being awarded work. All direct suppliers are contractually obligated to adhere to the Code which specifically prohibits the use of child or forced labour in any form. Direct suppliers are audited against the Code and undergo validations of labour practices in addition to all other business practices. A majority of the Code audits are performed on-site, as on-site audits are the preferred method of ensuring adherence to the Code. A smaller number of audits are conducted virtually as needed due to site restrictions, travel hazards, or other mitigating circumstances.

Existing direct suppliers are also continuously monitored through many of our various mechanisms such as our annual audit plans, which are based on a variety of criteria including: annual spend, location, engagement strategy, input from other supplier evaluation tools such as TPDD screenings and Corruption Perception Index (CPI) from Transparency International. We do not tolerate suppliers with non-compliant findings in the areas of Human Rights (i.e., child labour and forced labour) and Business Ethics. Positive findings in any of these areas are considered "Critical," and trigger swift responses in regards to discontinuing business operations with an existing supplier, or ceasing onboarding activities with a new direct supplier.

Risk assessment and management

Whirlpool Corporation, on behalf of KitchenAid and its other subsidiaries, engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of modern slavery and human trafficking in our business and supply chains, Whirlpool Corporation has partnered with a third party supply chain assessment company to provide end-to-end solutions for supply chain monitoring including modern slavery concerns, customised according to our sector, geography and size. These reviews produce supplier scorecards with actionable ratings, complete audit results, and improvement management.

Key performance indicators to measure effectiveness of steps being taken

Through Whirlpool Corporation’s governance processes, we monitor compliance with our policies on an ongoing basis and also review any concerns raised through our Integrity Line, which is managed by a third party and allows reporters to remain anonymous, and other mechanisms of employee feedback (e.g., Human Resources, supervisors, Legal). Any non-conformance identified is dealt with by the appropriate teams. Support is provided to suppliers where necessary to resolve any issues raised.

We also assess the effectiveness of our policies by regularly auditing our direct suppliers to ensure compliance with our Code. Additionally, the supplier due diligence process is subject to audit by Whirlpool Corporation’s Internal Audit function.


Training on modern slavery and trafficking

Every year, KitchenAid personnel at all levels are required to complete a mandatory certification process to ensure that the Whirlpool Integrity Manual, which is our Code of Business Conduct and Ethics, is understood and properly applied to our daily activities. We provide employees with ongoing and periodic training opportunities to ensure that all employees have current knowledge. Although our employee training did not include dedicated training on forced and child labour explicitly, KitchenAid aims to explore the possibility of reviewing employee training tools to include training dedicated to preventing forced and child labour.

Approval

This statement has been approved by KitchenAid Europa, Inc. Board of Directors on 25 June 2024 in accordance with Section 54(1) of the Modern Slavery Act 2015 and relates to the financial year ended 31 December 2023.

On behalf of KitchenAid Europa, Inc.,



Jan Reichenberger
General Manager
KitchenAid Europa Inc., Belgian branch