

GLOBAL ANTI-HARASSMENT AND NON-DISCRIMINATION POLICY

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Owner: HR Legal/Employee Experience

WHAT WE BELIEVE

Whirlpool Corporation (“the Company”) believes that respectful, professional conduct furthers the Company’s mission, promotes productivity, minimizes disputes, and reflects the culture and values of the Company. Discrimination or harassment by co-workers, supervisors, or any third parties is a form of misconduct that destroys our work environment and undermines the integrity of the employment relationship and violates our Company values of Respect, Integrity, Inclusion and Diversity, and acting as One Whirlpool. The Company is committed to providing a work environment that is free of unlawful discrimination and harassment and has zero tolerance for any form of discrimination or harassment that violates this policy.

OUR COMMITMENT TO YOU

- Whirlpool is committed to creating and maintaining a workplace environment where everyone is treated with dignity and respect and one which is free of unlawful discrimination and harassment, including racial and sexual harassment.
- Whirlpool prohibits unlawful discrimination, harassment or sexual harassment at our workplace or in a forum that may negatively impact our employees or Company reputation, by or against any individuals involved in our operations, including employees, applicants, consultants, third-party suppliers, and any other third parties involved in our operations.
- Whirlpool prohibits unlawful discrimination or harassment in recruitment, hiring, compensation, promotions, transfers, performance management, discipline, demotions, terminations, layoffs, access to benefits and training, and all other aspects of employment, based on race or ethnicity, religion, sex, pregnancy, gender expression or identity, sexual orientation, age, physical or mental disability and veteran status. Whirlpool also views discriminatory, harassing, or bullying behavior outside of the workplace as a violation of this policy if it could negatively impact our employees or the Company’s reputation. Local laws may have additional protected categories or requirements, and Whirlpool also abides by those requirements and prohibits discrimination based on those categories, as applicable. A full list of locally-protected categories can be obtained from local HR or HR Legal counsel.
- Whirlpool will perform a thorough and objective investigation of any received complaint of discrimination or form of harassment, consistent with local laws.
- Whirlpool will not tolerate any retaliation against someone for raising a good-faith concern under this Policy or participating in the investigation of such a concern.

OUR EXPECTATIONS

- Whirlpool expects all employees and visitors to comply with this policy and applicable employment discrimination laws, to support an environment free of discrimination and harassment, to participate in investigations to enforce this Policy, and to report concerns (whether they have experienced an issue or witnessed one).
- Whirlpool expects all leaders to also implement and enforce this Policy, including ensuring that employees have reporting avenues for concerns. If a concern is brought to a leader, they immediately should notify their HR business partner, the Employee Experience team, Legal, or contact the Global Integrity Line (Ethics Hotline) to review.

HOW YOU CAN REPORT CONCERNS

Any employee who experiences or witnesses behavior that in good faith they believe violates this Policy, or any applicable employment discrimination laws, should report their concerns to their people leader, a member of management, a Human Resources representative, the Employee Experience Team, a member of the Legal team, or through the Global Integrity Line (Ethics Hotline) at: <https://secure.ethicspoint.com/domain/media/en/gui/39659/index.html>. In some regions, there are committees in place to receive and address complaints, and employees in those regions can report concerns there as well.

DISCIPLINE

Employees who violate this Policy will be subject to discipline, up to and including discharge, consistent with applicable laws. In addition, leaders who fail to report or address behavior that violates this Policy or knowingly allow such behavior will be subject to discipline, up to and including discharge, consistent with applicable laws. Third parties who engage in any conduct in violation of this Policy will be subject to removal from Whirlpool property and termination of any business relationship with Whirlpool.

WE WILL NOT TOLERATE ANY RETALIATION

Retaliatory treatment of any employee for reporting in good faith any discrimination, harassment or other prohibited behavior, or for cooperating in a harassment investigation, is strictly forbidden. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, indirect discrimination or harassment, changes in work duties or responsibilities, bullying, adversely affecting working conditions or otherwise denying any employment benefit, or excluding a reporting party from participating in business or work-related social activities or discussions in order to avoid, counter or prevent allegations of discrimination or harassment, or as a form of punishment against the reporting party.

Any employee who engages in retaliation will be subject to discipline, up to and including discharge, consistent with applicable laws. The initiation of a good-faith complaint of discrimination or harassment or a good-faith complaint of retaliation will not be grounds for disciplinary action, even if the allegations ultimately cannot be substantiated. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination, consistent with applicable laws.

POLICY DEFINITIONS

- A. Definition of Workplace** The workplace includes: actual worksites such as our offices, factories, call centers, and laboratories; any setting in which work-related business is being conducted (whether during or after normal business hours); online and electronic interactions on social media sites or in other public forums with employees and/or third parties that are related to our operations or that could negatively impact our employees or the Company's reputation; Whirlpool-sponsored events, and Whirlpool-owned/controlled property.
- B. Definition of Harassment** Unlawful harassment may include, but is not limited to, conduct/behavior or a pattern of conduct/behavior, comments, or displays of offensive material or gestures. It can be a single incident or conduct/behavior that continues over time. Unlawful harassment can take many forms. Examples of unlawful harassment may include, but are not limited to:
1. Offensive comments, jokes, emails, symbols, tattoos, gestures or behavior that disparage, ridicule, or are otherwise offensive based on a person's membership in one of the protected categories, such as race or religion;
 2. Imitating a person's accent, speech or mannerisms;
 3. Persistent or inappropriate questions about whether a person is pregnant, has children or plans to have children;
 4. Inappropriate comments or jokes about, among other things, an individual's age, sexual orientation or disability; and
 5. Bullying, abusive conduct, mobbing, or otherwise creating a toxic work environment.
- C. Definition of Sexual Harassment** For the purposes of this Policy, sexual harassment means an incident or repeated incidents involving unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:
1. Such conduct might reasonably be expected to cause insecurity, discomfort, offense or humiliation to another person or group;
 2. Submission to such conduct is made (implicitly or explicitly) a condition of employment;
 3. Submission or rejection of such conduct is used as a basis for any employment decision affecting the applicant or employment (including, but not limited to, hiring decisions, matters of promotion, training, a raise in salary, job security and benefits); or
 4. Such conduct has the purpose or the effect of unreasonably interfering with a person's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment includes various forms of offensive behavior based on sex and includes inappropriate comments or conduct that are not necessarily sexual in nature, but which are directed at an individual because of his or her gender. Both men and women can be victims of sexual harassment, and a harasser may be of the same or opposite sex. Examples of behaviors that may constitute sexual harassment include, but are not limited to:

1. Unwanted sexual advances, propositions or demands;
2. Threats, punishment or denial of a benefit for refusing a sexual advance;
3. Offering employment benefits in exchange for a sexual favor;
4. Visual conduct, such as leering, making inappropriate gestures, or displaying sexually offensive material;
5. Verbal conduct, such as making or using sexually-suggestive or obscene comments,

- innuendos, slurs, jokes, or comments about a person's body, clothing or sex;
6. Verbal and/or written abuse of a sexual nature;
 7. Graphic, verbal and/or written sexually-degrading commentary about a person's body or clothing, or sexually-suggestive or obscene letters, notes, emails, texts, tweets, blogs or other social media activity;
 8. Unwanted attention or activity after a consensual relationship ends;
 9. Physical contact of a sexual nature, such as touching or caressing; and
 10. Sexual/physical assault.
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QUESTIONS AND ANSWERS

Question: How do I report a concern if I am at a plant or remote location, and my concern is about local leadership at my facility?

Answer: Ideally, you will have an HR resource or member of management with whom you can speak about your concern. However, if not, you can always use our EthicsLine to report a concern from anywhere around the world. Ethics Line cases will be reviewed by a specialist who will investigate your concerns. Under no circumstances does Whirlpool tolerate retaliation for raising a concern through any avenue.

Question: In the United States, don't I have a First Amendment right to share my opinions and display slogans and symbols consistent with my beliefs?

Answer: The First Amendment does not apply to private companies like Whirlpool, and Whirlpool has the right to set rules for acceptable behavior at our workplace. With respect to symbols and speech, we will not permit anything offensive that reflects hatred towards others. Individuals may share opinions or display symbols associated with politics or social causes- as long as those beliefs are not associated with hate or denigration of a particular protected group, the symbols are not disrespectful to groups or persons, and the employee is not representing themselves in any way that could appear they are speaking on behalf of Whirlpool. The Company will make the final decision on acceptable forms of expression at the workplace. In any case, workplace disruptions caused by such expression will not be permitted, and the Company reserves the right to take appropriate steps to end any such workplace disruption and to enforce this policy.

Question: Does this policy only apply to behavior at the workplace?

Answer: This policy applies to behavior at the workplace, behavior between employees outside of the workplace, and behavior outside of work (including on social media) that could negatively impact our employees or Company reputation. For more information on Whirlpool's social media guidelines, please see our [Social Media Policy](#).

Question: I belong to a protected category. Can I make comments or jokes about my own protected category?

Answer: Comments that may be viewed as discriminatory or harassing violate this policy regardless of who makes them.

Question: I work in a country where there is mandated retirement based on age. Does the age discrimination prohibition in this policy supercede that practice?

Answer: Whirlpool prohibits illegal discrimination based on age, and all practices must comply with local laws regarding age.

Question: I work in a country that prohibits "bullying" of any kind. Does this policy apply?

Answer: Whirlpool does not condone or approve of bullying, and this Policy prohibits unlawful bullying and “mobbing”.

Question: I work in a country that does not prohibit sexual orientation discrimination. Does this policy apply?

Answer: Yes, Whirlpool prohibits sexual orientation discrimination regardless of jurisdiction.

ADDENDUM FOR ONTARIO, CANADA

DEFINITIONS

For the purposes of the application of this policy in Ontario, Canada, the following definitions apply:

- A. Definition of Workplace Harassment** Workplace harassment means (a) engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, or (b) workplace sexual harassment. Harassment is a form of **discrimination** when it is based on a ground or characteristic protected by the Ontario *Human Rights Code*.

- B. Definition of Workplace Sexual Harassment** Workplace sexual harassment means (a) engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or (b) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

WHAT IS NOT HARASSMENT

A reasonable action taken by an employer or supervisor relating to the management and direction of employees is not workplace harassment.

INVESTIGATION

Whirlpool will investigate and deal with all complaints or incidents of workplace harassment or discrimination in a fair, impartial and timely manner. Whirlpool will, to the extent possible in the circumstances, keep information about the incident or complaint, the investigation, and the results of the investigation (including information about the individuals involved) confidential, and will not disclose such information unless disclosure is necessary for the purpose of the investigation, or taking corrective action with respect to the complaints, or otherwise as required or permitted by law.