

Our Philosophy

In today's modern world of increasing global migration, whether industrialised, developing or in transition, no sector can be considered immune to the risks of modern slavery. Modern slavery can be determined as forced labour, subjection, impaired freedom, human trafficking and slavery. Welbilt Inc. has a zero tolerance policy toward any kind of modern slavery whether internally within our business, or externally within the global footprint of our supply chains.

Our Structure and Supply Chain

Welbilt Inc. is a global leader in manufacturing and distributing commercial foodservice equipment and systems for professional applications. Headquartered in the Tampa Bay area of Florida, and operating 17 manufacturing facilities throughout the Americas, Europe and Asia, Welbilt sells through a global network of over 3,000 distributors and dealers in over 100 countries. The company has approximately 5,500 employees and generated sales of \$1.46 billion in 2016.

With a global reach of operations and a global span of supply chains, we source our raw materials and semi-finished goods by careful selection and continuous audit of our supply partners

Our Policies and Procedures

Welbilt internal policies ensure that our own internal operations are subjected to internal audit protocols, not only ensuring that we ethically and responsibly manufacture in the right way, but also that we are operating to strict health and safety processes. Welbilt prides itself on its internal health and safety record and on looking after our greatest asset, our own people. Notwithstanding this, we endeavour to apply the same rigour to our supply chains.

As part of our internal processes our teams have the right and the obligation to report any feared, implied or witnessed infringement within Welbilt or our supply chain. This can be done as part of our whistleblowing policy or in direct feedback to senior management within the organisation.

Adoption of an ethical trading and modern slavery agreement is a prerequisite to doing business with any new supplier.

Measures that we have taken to identify and mitigate risks

Not being content with a signature on a supply agreement, we physically audit our suppliers (wherever they may be in the world) ensuring compliance and that, both in spirit and in letter, they are honouring our standards and beliefs of safe, sustainable and ethical manufacture and sourcing. Accompanying each audit is a physical document that is not exclusive to any one particular area of business, but covers manufacturing, engineering, health and safety, along with ethical trading. The continuous process of auditing our suppliers allows us to carry out risk assessments and to reveal areas of concern.

Further steps to prevent Modern Slavery in our business

Senior management is responsible to ensure compliance to the policy within their respective business unit / area, including suppliers and key strategic partners.

We regularly meet, communicate and write to our supply base, making them aware of our commitment to Modern Slavery and ethical trading. This ensures that we have their support and ongoing commitment to an issue about which we, as a business, are extremely passionate.

Recognising the hugely complex nature of modern supply chains and our ever shifting business journey of continuous improvement, we continue to review all policies and ensure that we take a proactive approach to policy change and development. After these reviews, changes and modifications are communicated to all parties seeking their support and buy in.

As part of the measurement of the effectiveness of the Modern Slavery policy, we will continually review the following performance measures:

- Actions and changes to our supplier audit process
- Identification of suppliers and regions where there may be potential risk
- Investigations and actions whereby risk and deviation from our policy exists
- Staff training levels

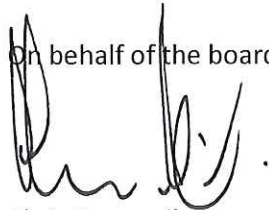
Internal training

As part of our ongoing training and development plan, we ensure that employees are made aware of our policies are trained and communicated to on any changes as they occur.

We have in place whistleblowing procedures, robust communication lines and a culture of sharing information to ensure that any breach of policy can be quickly and robustly reported without fear of recriminations by any person.

The statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

On behalf of the board of directors of Welbilt UK Limited



Chris Cammoile,
Director