

## **Modern Slavery Report 2023**

### **WCGP Nova Scotia Co., for itself, and on behalf of Whirlpool Canada LP**



This Modern Slavery Report (the “Report”) addresses the period from January 1, 2023 to December 31, 2023 (“Fiscal 2023”) and has been prepared in compliance with the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada)(the “Act”). This Report is made on behalf of WCGP Nova Scotia Co. and Whirlpool Canada LP (collectively, “Whirlpool Canada”). Whirlpool Canada are subsidiaries of Whirlpool Corporation, an American public company listed on the New York Stock Exchange (NYSE: WHR) and headquartered in Benton Harbor, Michigan. As subsidiaries of Whirlpool Corporation, Whirlpool Canada has adopted the Whirlpool Corporation's due diligence policies and practices described in this report as further described in section 2 of this Report. “We” and “our” may refer collectively to Whirlpool Canada and/or to Whirlpool Corporation depending on the context.

## 1. Introduction

Forced labour and child labour, each as defined in the Act, are crimes and serious violations of human rights. Whirlpool Canada recognizes the important role that we have in ensuring that our operations and products, and the supply chains that support these, adhere to applicable laws and regulations, including the prevention and identification of forced labour and child labour in our supply chain. This Report sets out the steps we have taken during Fiscal 2023 to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods imported into Canada by Whirlpool Canada.

## 2. Our Business

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Whirlpool Canada's history of operations in Canada dates back to 1859. Whirlpool Canada is a kitchen and laundry company headquartered in Mississauga ON with over \$1 billion in annual revenues. We have 230 employees. We operate 750,000 square feet of warehousing and distribution in Milton ON and 425,000 square feet in Calgary AB. We supply approximately 1,100 retailers in over 3,500 locations across Canada. Our brands include *JennAir*, *KitchenAid*, *Whirlpool*, *Maytag*, *Amana*, *Gladiator* Garageworks, *Affresh* cleaning products and *Swash* detergents. Whirlpool Canada was again recognized as a 2023 "Great Place to Work in Canada" including as one of the "Best Workplaces for Women."

Whirlpool Corporation has a comprehensive, globally applicable approach to mitigating the impact of forced and child labour in its supply chain. Whirlpool Corporation applies and undertakes its policies, procedures, and processes described in this Report to itself and its subsidiaries around the world, including Whirlpool Canada. Additionally, management over Whirlpool Corporation's Global Strategic Sourcing (GSS) is organized centrally by Whirlpool Corporation. As part of Whirlpool Corporation, Whirlpool Canada 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 Whirlpool Canada and other subsidiaries globally. To be clear, the efforts described in this Report are taken by Whirlpool Corporation on behalf of Whirlpool Canada.

In total, we procure goods and services from approximately 30 direct suppliers, including Whirlpool Corporation. The suppliers we engage include businesses that supply our business with finished products that we sell to customers in Canada. These suppliers are located in both East and South Asia, Europe, and North America. Further information about our business can be found in Whirlpool Corporation's [2023 Annual Report](#) and [2023 Sustainability Report](#).<sup>1</sup>

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<sup>1</sup> The contents of Whirlpool Corporation's Whirlpool 2023 Annual Report, 2023 Sustainability Report, Integrity Manual, and Supplier Code of Conduct are not incorporated by reference in this Report.

## 3. Our Policies and Due Diligence Processes

### **Policies**

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 Canada 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.

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- Hold our suppliers and business partners accountable to comply with these same principles through our Code.

**Whirlpools Ethics & Compliance Program:** We work tirelessly to mitigate risks through robust regular monitoring, governance and audits of our supply base to ensure compliance with the Code which formalises the key principles under which our suppliers are required to operate. In addition, we further lower supply chain risks by running independent background checks to ensure the direct suppliers we do business with are reputable through our third party due diligence program.

**Due Diligence**

We expect 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.

We acknowledge that there is a risk of forced labour or child labour in our supply chain. 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 forced labour 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.

## 4. Assessing Our Risk

Whirlpool Corporation, on behalf of Whirlpool Canada and other subsidiaries, engages in various activities to identify, assess, and manage supplier risk. In assessing the risk of forced and child labour 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 forced labour concerns, customised according to our sector, geography and size. These reviews produce supplier scorecards with actionable ratings, complete audit results, and improvement management.

We recognize that the risk of forced or child labour is increased in parts of Asia and where enforcement of labour and other laws is less stringent than other parts of the world, including countries with elevated risks associated with corruption (e.g., those countries which rank high in the Corruption Perception Index).

The third-party supply chain assessment includes a labour & human rights risk mapping process focusing on two areas: (1) human rights issues, including child and forced labour, human trafficking, diversity, discrimination and harassment and external stakeholder human rights; and (2) human resources, including health & safety, working conditions, structured social dialogue, career management, and training.

Initially, the review covered significant global direct suppliers for the first wave with an external third party due diligence provider. An additional wave has been initiated and diagnostics performed on direct suppliers in regional locations highlighted by recent forced labour news & enforcement. Selected direct suppliers are required to provide significant information through the third party due diligence platform for data analysis and supplier scorecarding. Results are then shared with Whirlpool Corporation’s GSS Center of Excellence team responsible for Code audits to determine if suppliers scoring low warrant

an immediate additional audit, if they are not already included in the annual intensive audit plan. Ongoing monitoring of supplier compliance status, through several of our screening programs, ensures we stay current with any major changes affecting potential supplier issues.

The enhancements and visibility provided by the third-party supply chain assessment company complements the significant efforts of Whirlpool Corporation's established rigorous audit and supplier oversight programs undertaken on behalf of Whirlpool Canada, which illuminate supplier risks in the supply chain.

## 5. Our Commitments

At Whirlpool Canada, we support human rights in everything we do, and our business practices reflect our commitment to ensure every person who works for us throughout all of our global operations does so of their own free will, in a safe and healthy environment. Whirlpool Canada supports the human rights of everyone we work with and expects our global business partners to do the same.

Our commitment to human rights is based on the United Nations Global Compact principles, which are derived, in pertinent part, from the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. This commitment to human rights is also woven throughout the Whirlpool Integrity Manual, Code, and various other employee policies and procedures.

As noted above, through Whirlpool Corporation, we have a robust program to identify, assess and manage supplier risk, including the risk of forced labour presented by our supply chain. As is evident from our robust programs described in this Report, we take reasonable efforts to identify, prevent, and reduce the risk of forced and child labour in our operations and supply chain.

### **Steps to Prevent and Reduce Risks of Forced and Child Labour**

Among the steps we have taken to prevent and reduce risks of forced and child labour are the following:

- Mapping supply chains;

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- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains;
- Contracting an external assessment of risks of forced labour and/or child labour in the organization's activities and supply chains;
- Developing and implementing an action plan for addressing forced labour and/or child labour;
- Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily;
- Addressing practices in the organization's activities and supply chains that increase the risk of forced labour and/or child labour;
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains;
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour;
- Requiring direct suppliers to contractually commit to abiding by Whirlpool's Supplier Code of Conduct, child protection policies and processes;
- Developing and implementing anti-forced labour and/or child labour contractual clauses;
- Developing and implementing anti-forced labour and/or child labour standards, codes of conduct and/or compliance checklists;
- Auditing direct suppliers;
- Monitoring direct suppliers;
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour;
- Developing and implementing grievance mechanisms;
- Developing and implementing training and awareness materials on forced labour and/or child labour;
- Developing and implementing procedures to track performance in addressing forced labour and/or child labour;
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour;
- Engaging with civil society groups, experts and other stakeholders on the issue of addressing forced labour and/or child labour;

### **Remediation Measures**

The Whirlpool's Integrity Manual, which applies to Whirlpool Canada, encourages all employees and contract workers of Whirlpool Corporation and its subsidiaries to report actual or possible misconduct. We provide a number of channels by which anyone can report potential misconduct including a third party managed anonymous hotline. We have a zero-tolerance policy for retaliation against those who report potential or actual misconduct or violations of our policies or applicable law.

Whirlpool Corporation undertakes diligence efforts (as further described in this Report) on behalf of Whirlpool Canada to ensure that the risk of forced labour and child labour is mitigated in our business. In the event that we discover any actual or potential forced labour or child labour in our business and supply chains, we will investigate and remediate those circumstances promptly. As part of the investigation and remediation process, we may take disciplinary action against employees or suppliers who are involved, up to and including termination of employment or business relationship.

Our approach is to prevent any presence of forced labour situations in the supply chain through robust due diligence activities during supplier onboarding and continuous monitoring of vendors described in this Report. By conducting regular compliance screenings of our suppliers and onsite inspections of their facilities, we ensure that workers are treated fairly and suppliers uphold our stringent ethical standards. We will not engage with a new supplier or hesitate to terminate an existing supplier that does not meet our high standards and expectations.

In 2023, no instances of forced or child labour were identified in the reporting period, and we therefore did not take any remediation measures, nor any measures to remediate the loss of income to the most vulnerable families arising from such a measure.

### **Training**

Every year, Whirlpool Canada 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 Whirlpool Canada's employee training did not include dedicated training on forced and child labour explicitly, Whirlpool Canada aims



to explore the possibility of reviewing employee training tools to include training dedicated to preventing forced and child labour.

## 6. Our Progress and Effectiveness

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).

Additionally, Whirlpool Corporation's Senior Vice President for Global Strategic Sourcing regularly reviewed the results of third-party due diligence and audits. 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.

## 7. Approval & Signature

This Report was approved by WCGP Nova Scotia Co.'s Board of Directors in accordance with section 11(4)(b)(ii) of the Act on **May 30, 2024** and has been submitted to the Minister of Public Safety and Emergency Preparedness in Canada. This Report is also available on our company websites at:

<https://whirlpoolcorp.com/canada/>

<https://whirlpoolcorp.com/canada-french/>

[https://www.whirlpool.ca/en\\_ca/owners.html](https://www.whirlpool.ca/en_ca/owners.html)

[https://www.whirlpool.ca/fr\\_ca/owners.html](https://www.whirlpool.ca/fr_ca/owners.html)

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In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Report for WCGP Nova Scotia, for itself, and on behalf of Whirlpool Canada LP. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



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Gary Power  
General Manager and Vice President

**May 30, 2024**

**I have the authority to bind WCGP Nova Scotia Co.**

**Whirlpool Additional Information**

This Report includes forward-looking statements as defined in the Private Securities Litigation Reform Act of 1995, including (but not limited to) statements about expected future supplier diligence efforts, development of company processes supporting those efforts and our expectations regarding those company processes. Many of the forward-looking statements contained in this document may be identified by the use of words such as “believe,” “expect,” “anticipate,” “should,” “planned,” “estimate” and “potential,” among others. These forward-looking statements are based on our expectations and beliefs concerning future events and involve risks and uncertainties that may cause actual results to differ materially from current expectations. These risks and uncertainties are difficult to predict accurately and may be beyond our control, and may include (but are not limited to) regulatory changes and judicial developments relating to forced labour and child labour, changes in or developments related to our products or our supply chain, and industry developments relating to supply chain diligence, disclosure and other practices. Other risks and uncertainties relevant to our forward-looking statements are discussed in greater detail in our reports filed with the Securities and Exchange Commission. Forward-looking statements in this document speak only as of the date made, and we disclaim any obligation to update or revise these statements as a result of new developments or otherwise.