CONFLICT MINERALS SOURCING POLICY

Introduction to Conflict Minerals

Columbite-tantalite, cassiterite, wolframite and gold ores – which are refined into tantalum, tin, tungsten and gold, respectively (collectively, "3TG minerals") – are considered to be conflict minerals.

In August 2012, as required by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("the Dodd-Frank Act"), the U.S. Securities and Exchange Commission ("SEC") approved its final rule ("Conflict Minerals Rule") on the disclosure of conflict minerals. This rule requires publicly traded SEC reporting companies to annually report the presence of 3TG minerals that are necessary to the functionality or production of products they manufacture or contract to manufacture. If a company's products do contain 3TG minerals, the company must annually file a Form SD with the SEC and conduct a reasonable country of origin inquiry ("RCOI") regarding the source of those 3TG minerals. If as a result of its RCOI, the company knows or has reason to believe that its 3TG minerals were sourced from the Democratic Republic of Congo and adjoining countries (the "DRC Zone") and are not from recycled or scrap sources, the company must file as an exhibit to its Form SD a Conflict Minerals Report ("Report") describing the company's procedures to determine the source and chain of custody of any 3TG minerals in its products.

The 3TG minerals are used in a wide variety of consumer products, and Whirlpool is currently investigating – in cooperation with our supply base – where these may be found in our products worldwide.

Compliance Initiatives

Whirlpool has developed a conflict mineral due diligence framework that conforms to the nationally and internationally recognized due diligence framework developed by the Organisation for Economic Co-operation and Development ("OECD"). Whirlpool relies on first tier suppliers and collaborative initiatives, such as the Conflict Free Sourcing Initiative's (CFSI) Conflict Free Smelter Program to provide information regarding the origin of 3TG minerals. Our goal is for our products to be DRC conflict free, while continuing to support responsible in-region mineral sourcing.

Whirlpool is taking a number of actions to support this policy, including the following:

- Exercising due diligence with relevant suppliers consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals and encouraging our suppliers to do the same.
- Actively participating the Conflict Free Sourcing Initiative, a multi-stakeholder effort which promotes the sourcing of conflict free 3TG minerals, and the certification of 3TG mineral smelters and refiners as conflict free.
- Encouraging all relevant suppliers to move towards conflict free status, and to source 3TG minerals from smelters or refiners that are certified by the CFSI or other recognized organizations.
- Providing, and expecting our suppliers to cooperate in providing, due diligence information to help determine if the 3TG minerals in our supply-chain are "conflict free".
- Maintaining transparency by providing our Form SD, our annual Conflict Minerals Report, this policy, and our Supplier Code of Conduct available to key stakeholders and the public.

- Complying with federal laws and regulations requiring disclosure of the use of conflict minerals.

Next Steps

Whirlpool will continue its efforts to institutionalize our conflict minerals compliance program by performing additional due diligence measures with suppliers potentially sourcing 3TG minerals from the DRC Zone, and establish transparency over the supply chain by creating further awareness within the organization regarding the program.

Whirlpool will provide updates regarding its plans as this process moves forward. We will regularly review this policy and update as necessary.