WELBILT

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY AND STATEMENT

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Welbilt UK Limited and Welbilt Halesowen Limited (together referred to as **Welbilt**) are committed to acting ethically and with integrity in all our business relationships and take a zero tolerance approach to slavery and human trafficking. We aim to comply with the Modern Slavery Act 2015 (**MSA**) and expect our suppliers, and their supply chains, to take all reasonable and practical steps to comply with the MSA.

We also expect our suppliers, and their supply chains, to engage in good employment practices and to comply with all relevant legislation and regulations in the countries in which they operate. This statement and policy covers provision of goods and services provided from our offices in the UK.

Our Philosophy

In today's modern world of increasing global migration, all regions (whether industrialised, developing or in transition), are at risk of being affected by modern slavery and there is no industry or sector that can be considered immune. Welbilt has a zero tolerance policy towards modern slavery whether internally within our business, or externally within the global footprint of our supply chains.

Our Organisation

Welbilt UK Limited and Welbilt Halesowen Limited are fully owned subsidiaries of Ali Holding S.r.L, a company incorporated in Italy. Ali Holding S.r.L. is a global leader in manufacturing and distributing commercial foodservice equipment and systems for professional applications. Headquartered in Milan, and operating 75 manufacturing plants in 17 countries, Ali Holding S.r.L sells through a global network of over 5,000 distributors and dealers in over 100 countries. Ali Holding S.r.L has approximately 14,500 employees and generated sales of 4.4 billion EUR in 2023.

Our Structure and Supply Chain

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 ensuring that we manufacture in an ethical and responsible way. 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. A critical part of this auditing is to ensure our suppliers and partners meet acceptable employment standards in the conduct of their activities.

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 for ensuring compliance with this policy within their respective business unit or area, including as regards to the activities of our suppliers and key strategic partners.

We regularly meet, communicate and write to our supply base, making them aware of our commitment to preventing modern slavery and promoting 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 and informed and receive training on any changes as they occur.

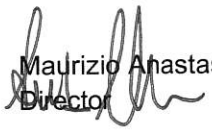
We have in place whistleblowing procedures, robust communication lines and a culture of sharing information to ensure that any breach of policy can be quickly and robustly reported without fear of recriminations by any person.

Statement

This policy sets out the steps which we have taken and are continuing to take to ensure that slavery and human trafficking is not taking place in any part of our UK business or supply chains. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Welbilt UK Limited and Welbilt Halesowen Limited for the financial year ending 31st of August 2024.

This policy and statement was approved by the Board of Welbilt UK Limited and Welbilt Halesowen Limited on 01 March 2024. A copy of this statement was signed by Maurizio Anastasia on behalf of the Board and published on our websites at https://www.welbilt.uk/Resources#Legal-Notices and https://www.multiplexbeverage.com/Resources#Legal-Notices.

This policy and statement was signed by:



Maurizio Anastasia
Director