

## **WHIRLPOOL CORPORATION CORPORATE DISCLOSURE POLICY**

### *Introduction*

The primary purpose of this Policy is to ensure compliance with applicable laws, including Regulation FD (Fair Disclosure) as adopted by the U.S. Securities and Exchange Commission.

### *Authorized Spokespersons*

Only the following individuals are authorized to communicate with the investment community:

- Chairman of the Board
- Chief Executive Officer
- Chief Financial Officer
- Executive Presidents
- Head of Investor Relations
- Director of Investor Relations
- Anyone else specifically authorized by the Chairman, CEO, and/or CFO.

### *Quiet Period*

The Company observes a quiet period beginning 15 calendar days prior to quarter end and ending at the time of the earnings release for that quarter. During a quiet period, there should be no formal or informal business discussions with any members of the investment community, including by Authorized Spokespersons. Rarely, the Company may make exceptions in its discretion because of the need to discuss breaking news or events. In such cases, the Company will issue a broad-based public disclosure of any material information prior to any such discussions.

### *Quarterly Earnings*

The Company holds a broadcast research analyst and investor conference call related to quarterly financial information. Advance notice is provided by a press release several days in advance. The earnings press release is furnished to the SEC on a Form 8-K before the call. An audio playback and presentation materials are hosted on the Company's website for at least 12 months.

### *Guidance*

Financial guidance may be provided in the fiscal year-end earnings press release and modified in subsequent quarterly earnings releases, if necessary. Generally, the Company will not update or provide additional guidance during the quarter, unless deemed necessary by the CEO and only in accordance with Regulation FD. Management and Investor Relations will not comment privately on prior public guidance other than to refer to the last time guidance was publicly given.

#### *Analyst Reports*

The Company will not comment or provide feedback on analyst reports, except to correct mathematical errors or other errors that can be rectified by referring to publicly available, historical, factual information. No other feedback or guidance on earnings models may be communicated.

#### *Market Rumors*

The Company will not respond to or comment on market rumors. If the NYSE requests a definitive statement, the CEO will determine whether to issue one.