

Human Rights Policy

The Middleby Corporation and all of its subsidiaries (collectively, “**Middleby**”) is committed to a work environment that is free from human trafficking, forced labor and unlawful child labor (“human trafficking and slavery”) and supports a level of human rights to which all people are entitled. As stated in our Code of Conduct, we are committed to compliance with all applicable human rights-related laws and regulations at all times and strive to exceed these standards where applicable.

We also strongly believe that we are responsible for promoting not only lawful but ethical employment practices as well. These practices are also required to be followed by our suppliers, subcontractors or business partners (collectively referred to as “**Suppliers**”) worldwide.

Risk Assessment

Middleby has a culture that supports human rights internally as an organization. While we work with Suppliers and other stakeholders that we believe generally share our values, we have identified the most salient risk to our company’s values regarding human rights is the activities of our Suppliers and other external stakeholders. This Policy is intended to address this risk by communicating the way we do business and what we expect and require from our Suppliers and other external stakeholders.

Community and Stakeholder Engagement

Middleby commits to serve as a positive influence in the communities in which we operate, demonstrating by our business decisions and actions our belief that human rights violations are both avoidable and unacceptable. Middleby will work to identify and do business with Suppliers who aspire to conduct their business in a similar manner.

Role and Responsibilities

This Policy applies to all Middleby employees and all of its Suppliers within Middleby’s sphere of influence throughout the world. In the event anything in this Policy may conflict with local law, local law will control the interpretation and application of this Policy.

Middleby has long addressed and will continue to address our belief in human rights, dignity, and fairness via our Code of Conduct and our historical employment practices, non-discrimination policies, minimum age requirements, fair compensation policies, and our policies on the health, safety and security of our employees and our facilities.

Middleby supports, respects, and will comply with local laws and regulations in all locations where we do business. We respect the sovereignty of governments throughout the world and the responsibility of such governments to protect the rights, welfare and health of their citizens. However, we expect our employees and Suppliers to abide by both the letter and spirit of Middleby’s Code of Conduct, and our other policies and processes in their dealings worldwide,

which in some cases may be more stringent than what is required by applicable local laws and regulations.

Human Rights

Middleby is committed to conducting our business in a manner that respects and advances human rights based on the Universal Declaration of Human Rights as well as the United Nations Global Compact, a strategic policy initiative for businesses that share similar values to commit to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labor, environment and anti-corruption. These principles include respecting the protection of minority groups' rights and women's rights. Our values and operating principles directly align with these principles.

Middleby will not willingly or knowingly assist in any violation of human rights, nor directly or indirectly benefit from human rights abuses committed by ourselves, our Suppliers or any other party, nor remain silent when we have reason to suspect that human rights violations are being committed. Middleby fully supports the prohibition of trafficking in humans, the use of forced labor or the procurement of commercial sexual acts during contract performance as not only legal violations but acts that are inconsistent with Middleby's values.

Labor

- Middleby is committed to the freedom of association and the recognition of the right to collective bargaining provided by law.
- Middleby is committed to the elimination of all forms of forced and compulsory labor including but not limited to prison and bonded labor.
- Middleby is committed to complying with all applicable wage and hour laws.
- Middleby is committed to the strict prohibition of human trafficking and effective abolition of child labor.
- Middleby is committed to providing safe and secure working conditions for employees, Suppliers, contractors, and all others working on Middleby's behalf.
- Middleby is committed to the elimination of discrimination with respect to employment and occupation, including not making employment-related decisions based on any characteristics protected by applicable law, such as age, color, gender, gender identity, national origin, physical or mental disability, race, religion, sexual orientation or any other legally protected personal basis.

What is Human Trafficking and Slavery?

“Human Trafficking” means the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.

“Forced Labor” means all work or service, not voluntarily performed, that is obtained from an individual under the threat of force or penalty.

“Harmful Child Labor” consists of the employment of children that is economically exploitative, or is likely to be hazardous to, or interfere with, the child’s education, or to be harmful to the child’s health, or physical, mental, spiritual, moral, or social development.

Middleby will not tolerate the use of unlawful child labor or forced labor in the manufacture of products it sells and will not accept products or services from Suppliers that employ or utilize child labor or forced labor in any manner. Human trafficking and slavery are crimes under state, federal and international law. These crimes exist in countries throughout the world. This Policy defines how Middleby will make efforts to eradicate human trafficking and slavery from not only within its organization but also from our supply chains.

Supplier Requirements

Suppliers to Middleby are required to do the following:

- Not use forced or compulsory labor, i.e., any work or service that an employee or contractor performs involuntarily, under threat of penalty;
- Ensure that the overall terms of employment or engagement of its employees or contractors are voluntary;
- Comply with the minimum age requirements prescribed by applicable laws unless a specific contract contains age requirements that are more protective to the employee or contractor;
- Compensate its employees and contractors with wages and benefits or other payments that meet or exceed the legally required minimum and will comply with overtime pay requirements;
- Abide by applicable law concerning the maximum hours of daily labor.

Suppliers must also refrain from:

- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents (such as passports or driver’s license) regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, or using recruiters that do not comply with local labor laws of the country in which the recruiting is taking place;
- Charging employees recruitment fees;
- Failing to provide return transportation or pay the cost of return transportation upon the end of employment in accordance with the requirements of FAR 52.222-50 Combating Trafficking in Persons;
- Providing or arranging housing that fails to meet the host country housing and safety standards; or

- Failing to provide an employment contract, recruitment agreement, or other required work document in writing in the language the employee understands if such an agreement is required by law or contract.

Certification

Upon request, Suppliers will certify that materials incorporated into the products they provide complies with the laws regarding human trafficking and slavery of the country or countries in which they are doing business.

Audits

Suppliers must be able to demonstrate compliance with this Policy at the request and satisfaction of Middleby. Middleby will perform periodic audits on this Policy.

Anonymous Ethics and Compliance Hotline

In order to identify, prevent and address actual or suspected human rights violations within our sphere of influence, any and all persons are encouraged to report such concerns to Middleby's Ethics and Compliance Hotline, as outlined in the Code of Conduct, to the extent permitted by local law. Reports may be made confidentially and anonymously to the extent permitted by local law. All persons who report suspected human rights violations in "good faith" will be protected from retaliation as outlined in the Code of Conduct. Middleby will investigate all reported issues and will take appropriate action against any employee who violates the human rights of others.

Consequences

Employees who are found in violation of this Policy will be subject to disciplinary action, including termination of employment.

Suppliers who engage in human trafficking and slavery will be subject to immediate termination of its business relationship with Middleby. If a Supplier to Middleby is otherwise found in violation of this Policy, Middleby will take prompt, remedial measures to address the violation, which may include termination of the business relationship.