

Conflict Minerals Policy Statement

The Middleby Corporation Policy:

As part of The Middleby Corporation's ("Middleby") commitment to corporate responsibility and respecting human rights in our own operations and in our global supply chain, it is Middleby's goal to use so-called conflict minerals—tin, tantalum, tungsten and gold—that do not directly or indirectly finance or benefit armed groups in the DRC, while continuing to support responsible mineral sourcing in the region.

We do not knowingly procure any conflict minerals from the "conflict region in and surrounding the Democratic Republic of the Congo", unless they originate from mines or smelters certified as "conflict free" by a recognized third party. Further, we ask our suppliers to undertake and document reasonable due diligence with their supply chains to determine whether conflict minerals, whether provided to us directly or used by those suppliers in products we obtain from them, are being sourced from:

1. Mines and smelters outside the "conflict region" or
2. Mines and smelters which have been certified by a recognized, independent third party as "conflict free," if sourced within the "conflict region".

This due diligence includes having our suppliers provide written documentation to us disclosing whether products containing conflict minerals used in the manufacture of our products or included components originate from outside the conflict region or, if they originate from within the conflict region, from mines or smelters certified as "conflict free" by a recognized, independent third party. Our goal is to ensure that only "conflict free" materials and components are used in our products.

If we discover the use of conflict minerals that have not been appropriately determined to be "conflict free," in any material, parts or components we procure for our products, we will take reasonable appropriate actions to transition our product to be "conflict free."