



## **POLITICAL CONTRIBUTIONS POLICY**

### **Policy No. 109**

Issued by: President and Chief Executive Officer  
Issue Date: February 29, 2016

#### **I. Introduction**

It is the policy of Welbilt, Inc. and its subsidiaries and affiliates (collectively, the “Company”) not to make political contributions on behalf of the Company. Such contributions are strictly regulated by law and generally not tax deductible. Each business unit will be required to inform its employees with sufficient frequency to ensure that this policy is not inadvertently violated. This policy is not meant to discourage political contributions by individuals. The Company will not tolerate influencing, on its behalf, any of its employees or associates on their choice of political candidates.

#### **II. Scope**

This policy applies to all directors, officers and employees of the Company.

#### **III. Corporate Political Issues**

From time to time the Company may wish to take a position on political issues affecting its welfare. Contributions, position statements, etc., that may relate to such issues will be strictly controlled by the Chief Executive Officer of Manitowoc Foodservice, Inc. Contributions will generally be made through appropriate political action committees and will be in strict accordance with applicable laws.

#### **IV. Lobbying**

Lobbying is recognized as an essential ingredient in the political process. However, the retention of lobbyists or employee involvement in lobbying activities must be made through the corporate office. The General Counsel will handle requests for lobbying or lobbyist retention, and activities will proceed only after approval by the Chief Executive Officer. Expenses for lobbying activities are regulated by law and are not tax deductible; therefore, procedures will be maintained to properly account for such expenses.