



Welbilt, Inc.
Company Policy

Conflict Minerals

May 16, 2017

PURPOSE

This policy sets forth Welbilt, Inc.'s ("WELBILT" or "Company") actions to comply with the SEC's rules (applicable to public companies) issued in August 2012 under the Dodd-Frank Wall Street Reform and Consumer Protection Act to perform due diligence of the Company's supply chain regarding use of Conflict Minerals in WELBILT products.

SCOPE

The Company's Conflict Minerals policy applies to all WELBILT subsidiaries and business units worldwide.

CONFLICT MINERALS

Integrity is one of WELBILT's three core values. We are committed to the highest standards of ethical and socially responsible behavior, and we do not condone the human rights abuses associated with the mining, transporting, or trading of conflict minerals.

WELBILT is following the efforts of The Electronic Industry Citizenship Coalition ("EICC") and the Global e-Sustainability Initiative ("GeSI") in requesting that companies undertake reasonable due diligence with respect to their supply chains to assure that they are not sourcing certain minerals (including tantalum, tin, tungsten, and gold, collectively "Conflict Minerals") from a location described as the "Conflict Region," which includes the Democratic Republic of the Congo and surrounding areas.

In light of our commitment, we are working with our suppliers to trace material content in our products in order to determine whether Conflict Minerals originating from mining or smelting operations in the Conflict Region are used

in the Company's products. We will not knowingly use Conflict Minerals from the Conflict Region in our products. To this end, we will require our suppliers to trace material content in the products they supply to us down to a conflict-free certified smelter and to provide us documentation regarding their due diligence efforts.

The Company will require its suppliers to procure components, parts, or products containing Conflict Minerals from sources that have been identified to be conflict-free. We will employ the standardized EICC/GeSI Conflict Minerals Reporting Template to map and monitor our suppliers' commitment and activities in this regard.

WELBILT is committed to doing business with those companies who share our values. We will communicate this policy to our suppliers and encourage them to set similar policies for their respective supply chains.

Adopted: May 2016

Updated: May 2017