



Welbilt, Inc. Corporate Policy Bulletin

Complaints Regarding Accounting or Auditing Matters

No: 211

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Issued by: General Counsel

Signed: Joel H. Horn

Approved: Hubertus Muehlhaeuser

PURPOSE

Welbilt, Inc. desires to cultivate an open and effective channel for employees, outsiders, management, advisers and others to communicate on a confidential and anonymous basis complaints and concerns regarding accounting, internal accounting controls and auditing matters relating to Welbilt, Inc., its subsidiaries and affiliates (collectively, the “Company”). In order to cultivate this atmosphere and ensure that Company management and the Audit Committee of the Board of Directors are aware of any issues, concerns, or problems regarding accounting, internal accounting controls and/or auditing matters, the Company, through its Audit Committee, has established the procedures set forth in this policy.

SCOPE

This policy applies to all employees and directors of the Company to provide a means for them to disclose in a safe and confidential manner any concerns they may have regarding accounting, internal accounting controls and auditing matters relating in any way to the Company.

COMPLAINTS REGARDING ACCOUNTING OR AUDITING MATTERS

1. Submitting Complaints or Concerns.

(a) **Complaint Submittal.** Any person who becomes aware of, concerned about, or suspicious of any improper or questionable accounting, internal accounting controls or auditing matters, or otherwise has any concerns regarding any accounting, internal accounting controls or auditing matters of the Company, may communicate those concerns in the following manner:

(i) **Website.** Go to the Company’s website at www.welbilt.com and click on Compliance Hotline link, which is located in the Corporate Governance section in the Investor Relations portion of the website. If the sender desires to remain anonymous, he/she should be sure not to include any personal or identifying information.

(ii) Third Party Hotline. Call the Company's Corporate Governance Hotline at 844-600-0072 for calls placed within the United States and Canada or 800-603-2869 (preceded by the country code) for calls placed outside the United States and Canada. If the sender desires to remain anonymous, he/she should be sure not to include any personal or identifying information.

(iii) EMEA. If located in Europe, the Middle East or Africa, in order to address European data protection requirements and language aspects, contact your country's local whistleblower address, which has been communicated by your country's local human resources contact.

(iv) General Counsel. Contact the General Counsel, by phone, email, or mail as follows:

General Counsel
Welbilt, Inc.
2 227 Welbilt Boulevard
New Port Richey, Florida 34655
Phone: 727-569-1171
Email: Joel.Horn@Welbilt.com

The submitter should provide enough information so that the General Counsel and, if necessary, the Audit Committee, may follow up meaningfully on the complaint or concern, including, if the submitter desires, the manner in which the General Counsel and/or Audit Committee may contact the submitter for further follow-up. Again, if the sender desires to remain anonymous, he/she should be sure not to include any personal or identifying information.

(b) Confidential Treatment. Although all complaints will be treated with care and respect, if the submitter desires any special confidential treatment, he/she should indicate the extent and manner in which he/she desires any information to be treated confidentially.

(c) Follow-up. Any person who has submitted a complaint or concern and believes that his/her concern has not been addressed or raised with the Audit Committee may submit a follow-up complaint through the process indicated above, submit a follow-up complaint directly to the General Counsel and/or request through the General Counsel that the Company verify that it has received the complaint or concern and has taken appropriate action. In such event, the Company will notify the submitter (unless the submittal was anonymous) that the Company has received the complaint or concern and that such action, if any, that the Company deems appropriate has been or will be taken. The Company is not obligated to inform the submitter of any specific action that may have been or may be taken in response to a complaint or concern. Except as required by applicable law, rule, regulation, judicial process or these procedures, the Company is not obligated to inform any person of any complaint or concern received regarding accounting, internal accounting controls or auditing matters or of any action that may have been or may be taken to address any such complaint or concern.

2. Receipt, Retention and Treatment of Complaints and Concerns.

(a) General Counsel Report to Audit Committee. The General Counsel will, on a regular basis, and whenever requested by the Audit Committee, provide the Audit Committee or its designee with a report of all the complaints or concerns regarding accounting, internal accounting controls and/or auditing matters received since the General Counsel's previous report. Such report may be in summary form or in such other form as the Audit Committee or its designee may request from time to time. The Audit Committee is free to make further inquiries on its own regarding any complaint or concern.

(b) Recordkeeping. The General Counsel will keep a record of all complaints and concerns received. The records will be kept in a confidential manner and will be retained for a period of time determined by the Audit Committee.

(c) Audit Committee Designee. The Audit Committee may designate one member who will be responsible for the receipt from the General Counsel and the review of all complaints and concerns regarding accounting, internal accounting controls and auditing matters.

(d) Investigation and Recommendation. The Audit Committee and/or its designee will review all complaints and concerns received and undertake any investigation and/or follow-up that the Audit Committee and/or its designee deems necessary or advisable to understand the allegations or concerns and to recommend appropriate action to the entire Audit Committee and/or the Board of Directors. The Audit Committee and/or its designee may enlist the assistance of management, any employee or any outside person or agency in undertaking any such investigation and/or in determining what action, if any, is recommended or is to be taken.

(e) Action to Be Taken. Based on the facts and circumstances, the Audit Committee may take or cause to be taken any action that the Audit Committee deems necessary or appropriate to address any complaint or concern. In any event the Audit Committee will take or cause to be taken any action required by law, rule, regulation or judicial process. The Audit Committee will, on a regular basis, report to the Board of Directors regarding any complaints and concerns that the Company has received regarding accounting, internal accounting controls and/or auditing matters and any action that the Audit Committee has recommended or directed to be taken.

3. No Retaliation.

Under no circumstances will any action be taken against the person who has submitted a complaint or concern regarding accounting, internal accounting controls and/or auditing matters, for bringing any such matter or concern to the Company's attention. However, this protection will not shield the submitter from any action that may be taken against the submitter for any act or omission of the submitter in the underlying questionable or wrongful activity.