

Supplier Code of Conduct

The Middleby Corporation and all of its subsidiaries (collectively, “**Middleby**”) expects its suppliers to act ethically and in compliance with all applicable laws, rules and regulations at all times. This Supplier Code of Conduct applies to all suppliers of products or services to Middleby (our “**Supplier Partners**”).

Middleby expects to do business with suppliers that meet our standards and behave consistent with, and positively reflect, Middleby’s values throughout its global supply chain. These values are reflected in this Supplier Code of Conduct, which establishes the minimum standards that must be met by any Supplier that sells goods or does business with Middleby.

We expect our Supplier Partners to comply with contractual requirements, laws and regulations, and act in a way consistent with the principles and values of this Supplier Code of Conduct.

Social Responsibility – Human Rights and Labor Standards

1. Supplier Partners will not discriminate on the basis of gender, color, race, national origin, religion, sexual orientation, age, veteran status, disability or gender identity. Harassment or discrimination of any kind will not be tolerated.
2. Supplier Partners will not use slave, prisoner or any other form of forced or involuntary labor. Suppliers must take reasonable measures to ensure that all of their employees understand the terms of their employment.
3. Supplier Partners will not use child labor. Middleby has a zero tolerance policy regarding the employment of children where the age of employment is not in accordance with applicable laws.
4. Supplier Partners will not engage, directly or indirectly, in human trafficking. Middleby prohibits human trafficking abuses.
5. Supplier Partners will comply with applicable laws regulating work hours, wages and benefits. Employees must be paid in a timely fashion that meets or exceeds legal minimum standards.
6. If necessary for a Supplier Partner to use a labor broker, the Supplier Partner will ensure the broker employs ethical recruitment practices, complies with applicable laws, and does not withhold identity documents.
7. Supplier Partners will comply with applicable laws that recognize and respect the rights of employees to freedom of association and collective bargaining.
8. Supplier Partners must respect human rights and mitigate human rights impacts that the Supplier Partner causes, contributes to or is linked to, in accordance with applicable and international standards such as the core conventions of the International Labour

Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights.

Environment, Health and Safety

1. Supplier Partners will provide clean, healthy and safe environments for their employees that meet or exceed legal standards. Supplier Partners will have safety procedures for their employees and tracking tools that drive to a goal of zero workplace safety incidents. Supplier Partner employees will have the right to refuse work and report any conditions that do not meet these criteria.
2. Supplier Partners shall provide workers adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in the scope of work, including with respect to COVID-19.
3. Supplier Partners will increase efficiency throughout their companies and take reasonable measures to reduce their carbon footprint, energy use, water use, wastes, and other emissions. Over time, Middleby expects Supplier Partners will establish targets and be transparent in their progress toward their targets.
4. Supplier Partners will look to conserve resources and protect the communities and environment that surround them. Middleby encourages its Supplier Partners to develop and diffuse environmentally friendly technologies and to increase the use of renewable energies.

Business Ethics

1. Supplier Partners will not tolerate corruption, bribery, embezzlement or fraud in any form. This includes giving or receiving anything of value, including money, gifts or unlawful incentives to improperly influence negotiations or any other dealings with governments and government officials, customers, or any other third parties.
2. Supplier Partners will avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to: anti-competitive business practices, respect for and protection of intellectual property, company and personal data, export controls and economic sanctions.
3. Supplier Partners will provide an adequate mechanism for their employees to report integrity concerns, safety issues and misconduct without fear of retaliation. Supplier Partners will also appropriately investigate reports and take corrective action, if needed. Supplier Partners will prohibit retaliation.
4. Supplier Partners will communicate these or substantially similar codes to their suppliers and subcontractors. Supplier Partners will continuously improve their sustainability and stakeholder engagement progress. Middleby also encourages Supplier Partners to work

closely with local communities to implement projects and strategies that improve the community and those who live there.

Trust-Based Relationships with Ethical Supplier Partners

It is our goal to build trust-based relationships with ethical Supplier Partners who follow the principles in this Supplier Code of Conduct. Supplier Partners will develop and implement appropriate internal business processes and policies to ensure compliance with applicable law and this Supplier Code of Conduct. Supplier Partners shall self-report any violations of this Supplier Code of Conduct, be able to demonstrate compliance with this Code upon our request and will take any action to correct any non-compliance. Middleby may perform periodic audits on this Policy. We expect our Supplier Partners to cooperate with our reasonable requests for information, certifications, and/or audit access.

When there is a concern, our practice is to work with the Supplier Partner. Often we can help identify possible improvements. However, when a Supplier Partner is unwilling to engage or an issue cannot be corrected, we reserve the right to end our relationship. This Supplier Code of Conduct is subject to modification at Middleby's discretion. Middleby will notify Supplier Partners of any such modifications.

Subject to any restriction posed by law, Supplier Partners will promptly inform Middleby of any concern related to issues governed by this Supplier Code of Conduct. Middleby policy prohibits retaliation against any person reporting such a concern. To report a concern, suppliers can always speak directly to their Middleby purchasing or supply chain representative. In addition, the Middleby Ethics and Compliance Hotline allows employees, contractors, suppliers and others to report concerns of misconduct affecting Middleby. Individuals can file a report 24 hours a day, 7 days a week by phone, web, or email. Individuals filing reports on the Middleby Ethics and Compliance Hotline can remain anonymous, to the extent permitted by law. The Middleby Ethics and Compliance Hotline can be accessed at www.lighthouse-services.com/middleby or by reference to the reporting procedures set forth in the Middleby Code of Conduct.

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Middleby Policies

We encourage individuals to directly access and familiarize themselves with the following Middleby policies and reports which are available on Middleby's website at www.middleby.com, and are incorporated by reference into this Supplier Code of Conduct:

Middleby Code of Conduct

Middleby Sustainability Report

Middleby Environmental Health and Safety Policy

Middleby Human Rights Policy

Middleby Conflict Minerals Policy Statement

By signing below, Supplier Partner acknowledges its understanding of the Middleby Supplier Code of Conduct and agrees to abide by its standards.

Supplier Name: _____

By: _____

Name: _____

Title: _____

Date: _____