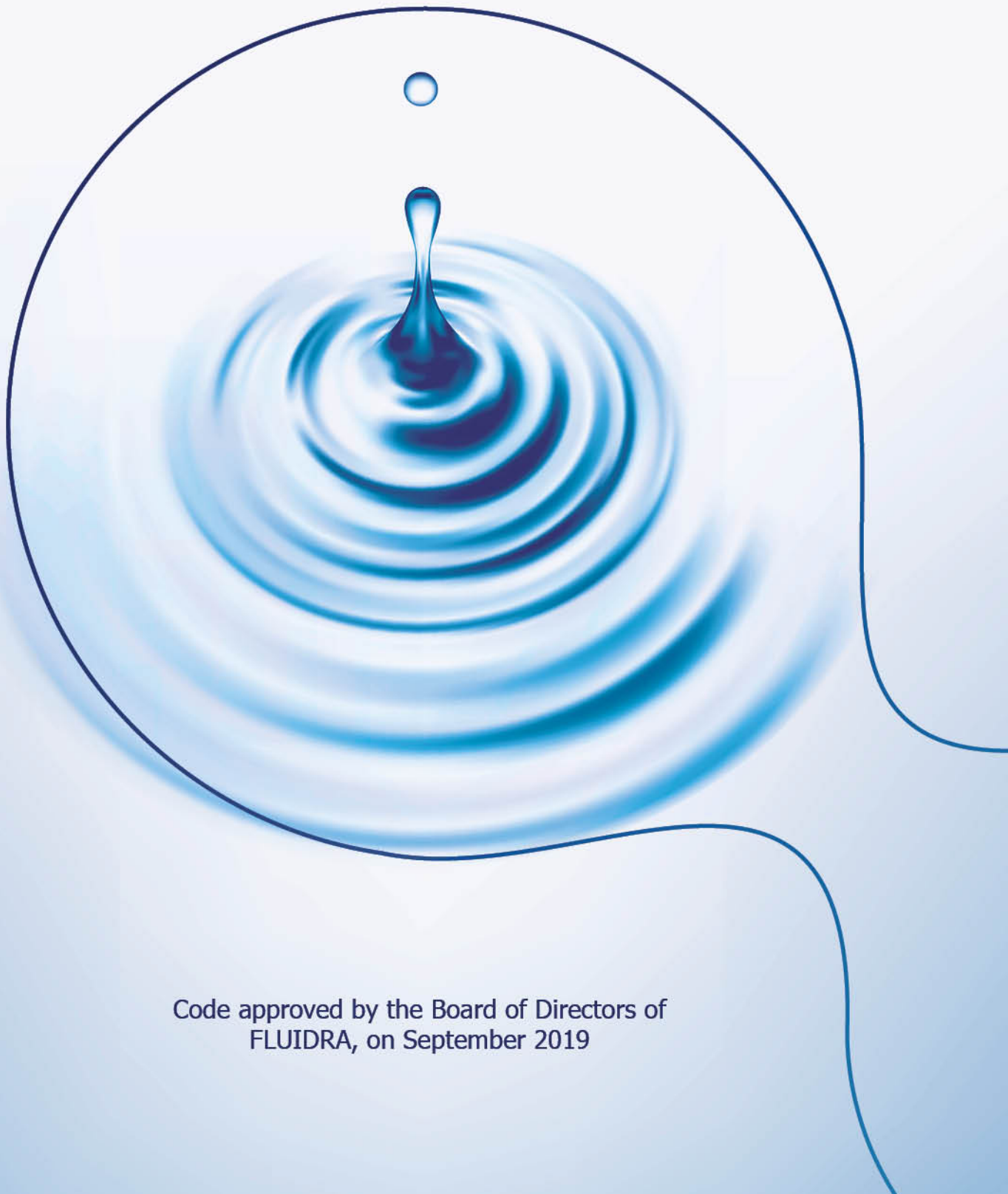


**FLUIDRA**  
**CODE OF ETHICS FOR**  
**SUPPLIERS**



Code approved by the Board of Directors of  
FLUIDRA, on September 2019

## 1. INTRODUCTION

Since the first company in Fluidra was founded in 1969, everybody who has chosen to travel the path with us has gone about business with a very clear premise and set of values: in order to become world leaders in our sector, we must respect people and laws, be upright in our dealings and worthy of the trust. These have been our values since the outset and since the merger with Zodiac they continue to form the basis of Fluidra's values as it stands today, which has made us the world leader in swimming pools and wellness.

The diversity of places and sectors in which we operate, and the diversity of the regulations under which we operate mean we have to combine concepts which serve as a framework to guide the actions of the suppliers who work with Fluidra. For the purposes of this document, by suppliers we mean: suppliers, contractors, subcontractors and other third parties that supply goods and services to Fluidra. Therefore, the obligations that the supplier assumes are required of its employees, contractors and subcontractors ("Suppliers").

As a responsible and sustainable organization, our aim is to be as transparent as possible in our business dealings by creating a relationship based on trust with our customers, Suppliers, shareholders, employees, public and private institutions, as well as with society at large.

Fluidra has made a firm commitment to the principles established in matters of human and labor rights, the environment and anti-corruption practices, as demonstrated when it signed up to the United Nations Global Compact in August 2007.

The dialogue Fluidra engages in with its Suppliers is essential to establishing solid, long-lasting relationships with them based on transparency and honesty, in order to create a mutually beneficial partnership. Our Suppliers, as well as the rest of our stakeholders, give us extremely useful information so that we are able to improve our business, optimize our production processes, and make our products and services better.

Fluidra strongly believes in disseminating its corporate values and principles to its stakeholders, in an endeavor to encourage them to behave ethically and responsibly, thus putting it in a position to give an undertaking to its customers that its products are manufactured in an environment that respects human rights and the environment.

This is why Fluidra has drawn up this Code of Ethics, on the basis of which it enters into an undertaking with its suppliers, whereby both parties pledge to respect and comply with the principles established in the Universal Declaration of Human Rights, the Rights of the Child and the Declaration of the International Labor Organization (ILO), in addition to compliance with the laws in force, all of which are essential requirements to maintaining current and future business relations.

## **2. OUR COMMITMENTS AND THOSE OF OUR SUPPLIERS**

Fluidra's values are reflected in the commitments that all of the Fluidra companies have made to their communities in order to promote a fairer and more sharing society, whilst respecting applicable legislation and the rules of sustainable development.

We are therefore confident that all of the companies that work with Fluidra will likewise take on these commitments, thus reaffirming and spreading our corporate culture.

Fluidra urges all of its Suppliers to raise any doubts through the Confidential Channel put in place about whether their actions or those of third parties could breach the ethical principles established by any of the Fluidra companies.

### **2.1. To society and human rights**

All of the businesses and people who conduct business with Fluidra are under the binding obligation not to violate the principles established in the Universal Declaration of Human Rights.

#### **Respect for human dignity**

Everyone has the right to be respected and treated with dignity, regardless of race, color, sex, language, religion, political or other opinions, national or social origin, economic status, birth, or any other condition as specified in Article 2 of the Universal Declaration of Human Rights.

Fluidra's Suppliers must undertake to maintain good relations with all people and to treat them with dignity, both within and outside of the organization.

#### **Abolition of forced labor**

Everyone has the right to carry out his or her work freely and voluntarily, in accordance with the legislation of each individual country, without being forced or coerced into working.

Fluidra's Suppliers must declare that they are against all forms of slavery, as well as all forms of forced labor as set out in the 4th principle of the UN's Global Compact.

#### **Abolition of child labor**

Fluidra's suppliers must work to eradicate child labor, prohibiting the recruitment of child labor on their worksites in breach of the Agreements and Recommendations of

the ILO regarding the worst forms of child labor.

## **2.2. To employees**

Fluidra's Suppliers must undertake to comply with and ensure compliance with all legislation in force in all of the countries in which they operate in order to create an environment of respect, equality and safety by respecting the following rules:

### **Respect for people**

Respect for the individual and personal rights of all their employees and those of Fluidra by providing a work environment that is free of intimidation and harassment, in order to protect the dignity and privacy of everyone.

The commitment to respecting people encompasses all aspects of working life and places a duty on all of our suppliers' employees to respect others, regardless of their position in their companies.

### **Right to equal treatment**

Suppliers must promote a corporate culture based on equal treatment and opportunities in accessing jobs, training, promotion and career development, and pay, as well as working conditions in general, in line with the legislation in force at any given time. Furthermore, Suppliers' working relationships must be based on the principles of mutual respect and equality.

Discrimination by Suppliers against anyone working for them is unacceptable on the grounds of age, political beliefs, language, religion or other beliefs, ethnic origin, race or country of origin, sex, sexual orientation, family status, illness or disability, having legal representation or belonging to a trade union, or being related to other employees in their companies.

### **Health and safety at work**

Health and safety at work is one of Fluidra's primary concerns, so it requires that its Suppliers promote a culture of integrated prevention in their organizations to prevent potential occupational hazards.

Suppliers must recognize and protect the fundamental rights of their employees to health and safety at work by putting the occupational hazard protection systems in place required by law.

Their commitment must focus on removing hazards from the workplace through the application of and compliance with health and safety regulations, in addition to setting

up prevention programs, running training courses and providing the information necessary on all potential occupational hazards that may affect employees.

All work to be carried out on suppliers' premises must comply with the safety measures required pursuant to occupational hazard prevention regulations or equivalent rules in the various countries in which they operate.

Suppliers must only employ employees who are eligible to work in the country in which they are to be employed and where the supplier has registered for any employment related statutory system in the country, including, but not limited to, any social security system.

## **Right of association and collective bargaining**

In line with the freedom of thought, expression and association, Supplier acknowledges an employee's right to freedom of expression and association, including the right to participate in a trade union without fear of intimidation or reprisal, in accordance with national law, as well as the freedom to participate in permanent non-profit associations designed to achieve specific goals, subject to the specific laws that may apply in each country.

## **Right to privacy and personal data**

Suppliers must respect and protect the privacy of persons who in their dealings with them provide them with personal data or confidential information. The Supplier will collaborate with Fluidra if necessary to prove and ensure that the personal data provided is protected and kept confidential.

## **Confidentiality and data processing**

Suppliers must ensure that data is protected and kept confidential, as their organizations and the people who work for them are duty-bound to do so. The duty to maintain the confidentiality of information obtained in the course of business with Fluidra will continue to apply beyond the termination of the business relationship, as required by contractual conditions and applicable legislation, to prevent third parties or entities from disclosing sensitive information about the organization.

Suppliers will be responsible for putting the appropriate security measures in place and following the procedures established for protecting the restricted and confidential information stored on hardware and electronic devices against any internal or external threat, or its unauthorized access, handling or destruction, whether intentional or accidental.

## **Professional ethics**

Fluidra's Suppliers must ensure that their employees do not have any conflict of interest or loyalty at work. Fair competition and the prevention of unfair competition are the benchmarks that must govern competition. Therefore, all employees must comply with the ground rules in respect of fair competition and anti-trust practices by ensuring that pricing is done unilaterally and independently of other competitors in the market.

## **Appropriate use of Fluidra's and third party assets**

Suppliers must respect Fluidra's industrial and intellectual property, as well as its know-how and, in general, any work created or developed by Fluidra.

Suppliers must make proper use of the machinery, equipment and IT systems for rendering their services to the standards required.

The intellectual and industrial property rights of third parties must likewise be respected.

## **Transparency in business and anticorruption**

One of the most important objectives of the UN's Global Compact is the fight against corruption, bribery and extortion.

In conducting their business, none of Fluidra's Suppliers should offer or grant public officers or any other person and/or group of persons who work in the private sector, directly or indirectly, any presents, gifts or other unauthorized benefits, whether in cash or in any other form, with the aim of securing preferential treatment in the awarding or continuation of public contracts, or for personal or corporate gain. They must likewise undertake not to enter into unlawful agreements that may restrict the freedom of the markets in which they operate.

Neither Suppliers, nor any of their employees, may carry out or be involved in activities related to the laundering (i.e. the acceptance or handling) of money obtained from criminal activities, in any shape or form. They must likewise comply at all times with the laws against money laundering that are in force in any competent jurisdiction and must fully cooperate with the authorities responsible for combating money laundering or the financing of unlawful activities.

## **To the environment**

Suppliers must be firmly committed to the preservation of the environment and respect for the balance of natural systems. Thus, all suppliers must at all times be aware of, accept and act in line with the criteria on respect for the environment and

sustainability in strict compliance with all regulations on the protection of the environment, as well as with Fluidra's standards on these matters.

In conducting their business, suppliers must at all times advocate respect for the environment, the minimum consumption of natural resources and the reduction of their environmental impact.

All projects that are taken on that may potentially have an impact on the environment must undergo a preliminary environmental impact study.

Fluidra requests that its Suppliers keep policies, processes and procedures in place to manage the environmental impact they cause, as well as compliance with the standards requested by Fluidra.

### **To legal compliance**

Suppliers must recognize the importance of whatever laws, rules, regulations, policies and standards to which their business is subject and comply with them.

## **3. RESPONSIBILITIES**

The Supplier acknowledges the importance of any laws, rules, regulations, policies and standards that apply to their activity and comply with these. In the event that there is any conflict between his Code and the applicable legislation in a country, compliance with the legislation of that country will take precedence.

## **4. INSPECTIONS**

In the framework of the undertaking entered into by Suppliers with Fluidra to respect and ensure compliance with the principles established in the Universal Declaration of Human Rights, they must give their consent so that representatives from Fluidra can visit their facilities in order to approve their best practices.

Should Fluidra ascertain that any of its Suppliers failed to respect the undertaking on best practices established in this Code, it may propose that they take corrective measures to remedy the breach or break off the contractual relationship as a last resort. Specifically, it may break off a contractual relationship with a supplier if the corrective measures put forward have not been applied.

## **5. CONVENTIONS AND RECOMENDATIONS**

There are a number of conventions and recommendations issued by international organizations that, in addition to the legislation of each country, provide general guidance and a voluntary framework on corporate behavior and conduct.

As an international company, Fluidra has voluntarily signed up to the international conventions and recommendations on corporate behavior, which form the working basis of this Code.

The most relevant conventions and recommendations that were taken into account in drawing up the Code are listed below:

- The Universal Declaration of Human Rights (UN).
- The United Nations' Global Compact (UN).
- Declarations of the International Labor Organization (ILO).
- Guidelines for Multinational Businesses (OECD).
- "Agenda 21" for Sustainable Development (UN).

Suppliers must undertake to sign up to these international conventions and recommendations on business conduct or, alternatively, respect the principles established in them in conducting their business.

## 6. UPDATE AND IMPROVEMENT

This Code of Ethics for Suppliers will be regularly updated in order to add any improvements considered necessary or that became apparent to define the ideal conduct to be encouraged in Fluidra's Suppliers.

Any comments, queries or suggestions related to this Code of Ethics and its guiding principles may be submitted to the Ethics Committee through the following channels:

Communication channel	Means of contact
<b>Fluidra's corporate web</b> <a href="https://www.fluidra.com/about-fluidra/ethics">https://www.fluidra.com/about-fluidra/ethics</a>	Direct Access to the form in the sections "About Fluidra/Ethics" or "Contact"
<b>Email</b>	<a href="mailto:ethics@fluidra.com">ethics@fluidra.com</a>

## 7. ACCEPTANCE OF THE CODE OF ETHICS FOR SUPPLIERS

In all current and future business relations between Fluidra and its Suppliers, they will be asked to accept and comply with the principles set out in this Code of Ethics in writing.

The Code of Ethics for Suppliers will be posted on Fluidra's website ([www.fluidra.com](http://www.fluidra.com)), as well as the acceptance form. All agreements signed with Suppliers will now include



# FLUIDRA

a clause to this effect.

