

ENVIRONMENTAL, SOCIAL, AND CORPORATE GOVERNANCE (ESG) POLICY

POLICIES & PROCEDURES

Environmental, Social, and Corporate Governance (ESG) Policy

Version 1

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TABLE OF CONTENTS

Section	Area	Page
1	General undertakings	4-5
2	Good governance	5-9
	2.1 – Business ethics and code of conduct	5-6
	2.2 – Corporate Governance	6-7
	2.3 – Transparency and stakeholder relations	7-8
	2.4 – ESG risk management	8
	2.5 – Anticorruption and bribery	8
	2.6 – Training	8-9
	2.7 – Partnerships with public organizations	9
3	Environmental matters	9-10
4	Social matters	10-14
	4.1 – Human rights	11
	4.2 – Employment and labor relations	12-13
	4.3 – Community engagement	13
	4.4 – Customers	13-14
	4.5 – Other policies	14

Environmental, Social, and Corporate Governance (ESG) Policy

The aim of the ESG policy is to define the organization's commitments toward making positive contributions to economic, environmental, and social progress. This is consistent with our membership in the United Nations Global Compact, of which we have been a part since 2007. The policy is also in line with the company's mission, vision and values.

Through partnerships with employees, suppliers, users, and other stakeholders, Fluidra focuses on delivering continuous improvements for the wellbeing of all people and caring for the environment while also respecting the laws in every region where the group operates, both directly and indirectly, through its businesses. We also strive to treat all group companies fairly and in accordance with international law and its specific obligations.

CUSTOMER

Fluidra helps grow their business by providing innovative quality product and services.

PLANET AND SOCIETY

Fluidra commits to use sustainable products and practices to protect future generations.

SUPPLIER

Fluidra develops strong partnerships through innovation, quality, service level and cost.

SHAREHOLDER AND INVESTOR

Fluidra generates sustainable value within an ethical business and financial environment.

EMPLOYEE

Fluidra provides a great place to work where the employees can realize their full potential and be recognized.

END USER

Fluidra creates the perfect pool and wellness experience to enhance comfort, enjoyment and peace of mind.

Fluidra's Stakeholders

With management's support, the ESG department will work to ensure that all parties can evaluate and manage the aspects covered in this policy. The department will also propose the goals to meet the commitments defined herein, that will be approved by the top management, and the specific objectives of which are reflected in the strategic plans and executed in regular reports. This follow-through will be reported to senior management and the board of directors on a regular basis.

1. GENERAL UNDERTAKINGS

- Strive to prevent our companies' activities from producing, or helping to produce, negative impacts and take the measures required to reduce them if they do occur.
- Endeavor to impede or reduce any indirect negative impact if directly related to our activities, products, or services.
- Develop and implement effective management systems that foster a relationship of reciprocal trust between the companies and the societies where they operate to ensure optimal management across all areas.
- Implement due diligence based on risk analysis and incorporate risks into the company's global risk evaluation in order to identify, prevent, or reduce real and potential negative impacts and report on the reaction to any negative impacts in terms of environmental, social, and governance matters.

- Engage in private and grassroots citizen initiatives to bolster social dialogue, ensuring that initiatives duly consider social and economic consequences in the countries and comply with existing regulations recognized at the international level.
- Support our business partners (suppliers, contractors, etc.) wherever we can by applying principles of responsible business behavior such as, for example, those defined in our code of ethics and also consider them our investments.
- Boost the communication of local stakeholders in planning and decision-making around projects that could affect them.
- Invest in innovation as a driver to improve the organization's quality, service, and competitiveness, while at the same time seeking excellence in efficiency and design to minimize any negative impact that the activity or products could produce.
- Always apply the precautionary principle if we suspect an activity, product, or technology is not supported by scientific studies or there is a high degree of uncertainty as to whether it could negatively impact the environment or people's health.
- Refrain from seeking or accepting exemptions not provided for in the legal framework in relation to human rights, the environment, health, safety, work, the tax system, financial incentives, etc.

2. GOOD GOVERNANCE

The core goal of the Corporate Governance is to align senior management's interests with those of the stakeholders in relation to our activity. To this end we support and defend the principles of good corporate governance and will roll out and implement such practices across all group companies. Specifically, our commitment focuses on the following areas:

2.1 Business Ethics and Code of Conduct

The company will base its good corporate governance management on the recommendations defined in the OECD Principles of Corporate Governance ([here](#)) and Spain's Securities Market Commission's code of good corporate governance ([here](#)) in implementing best practices in business ethics.

In relation to investors and shareholders, we will ensure the protection and exercise of their rights, principally the right to fair treatment. The company recognizes the rights of these stakeholders and promotes active engagement with them to promote wealth and job creation. The Regulations of the General Shareholders' Meeting consider these commitments in its wording ([here](#)).

The board of directors guides the company's strategic management, observes the work of the executive team and its accountability to the company and shareholders, and always considers stakeholder expectations. To deliver on these responsibilities, the board ensures the integrity of the

company's accounting and financial and nonfinancial reporting systems, including independent audits and the existence of control mechanisms and, in particular, risk management and financial and operational control, in addition to compliance with the laws and applicable regulations. The compliance and control systems extend to all group companies.

The corporate Ethic Codes, which include undertakings in the area of human and environmental rights, labor regulations, consumer protection regulations, and tax matters, amongst others, are intended to be met by all Fluidra partners, both internal workers and outsourced suppliers and any organization that engages with the group. These codes are reviewed regularly and approved by the board of directors. They are available to all interested parties over our corporate website ([here](#)). They include the commitment to always operate in a manner that respects competition and to avoid any act that breaches or is detrimental to the rules of free competition. We will also respect the compliance framework established by the organization.

All policies and initiatives promoted by the company must be published to all employees by internal communication methods and/or training sessions to ensure alignment by all members of the company. A confidential whistleblower channel is also made available to all employees, suppliers, and other stakeholders to alert us to any breach of corporate policies (ethics@fluidra.com). The company will protect whistleblowers and ensure no discriminatory or disciplinary measures are taken against employees who in good faith prepare reports for management or, where applicable, the competent public authorities on unlawful corporate practices or policies.

2.2 Corporate Governance

- The executive president, who is a part of the board of directors, has the final responsibility within the organization on ESG matters and ultimately evaluates and manages all its aspects.
- The Appointments and Compensation Committee (ACC), who advises the board, is informed at least twice a year by the MAC to monitor ESG initiatives, objectives, and strategy to be developed and is responsible for reporting to the board.
- The ESG department is at the same time in charge of consolidating and reporting the non-financial information that in turn will be duly published to the markets after the review by the internal auditor, the favorable report of the audit committee and the approval by the board of directors.
- The audit committee will be in charge of reporting favorably to the board of directors on the issuance to the markets of the non-financial information statements.
- The organization has its Articles of Association which constitute the core of its internal regulations and represents the contract that all shareholders accept upon acquiring said condition, establishing the bases and principles that govern the Company, its corporate bodies and functions and corporate purpose, amongst other relevant issues.

- The organization has its Regulations of the Board of Directors containing the guidelines for the Board's actions and the basic rules governing its organization, functioning and the conduct of its members.
- The organization has the Internal Rules of Conduct in the Securities Markets (IRC), whose purpose is to adjust the Company's actions, its administrative bodies, employees, representatives and persons with access to certain Company information into line with the rules of conduct that are to be respected by them when pursuing activities related with the securities market.
- With the goal of publicly formalizing the guidelines that inform the selection process for candidates to the Board, the Company publishes a dedicated policy ([here](#)).

2.3 Transparency and Stakeholder Relations

- Fluidra maintains open channels of dialogue with its stakeholders to respond to any questions they could have regarding its activity, services, or products released for sale, and to include these expectations in the definition of the ESG strategy. A materiality analyses will be conducted at least every two years.
- The company will implement across-the-board due diligence to identify, prevent, correct, reduce, and/or eliminate any material risk or potential and/or real social and environmental impact throughout the value chain caused by our activity or products. Management in supply chain areas where higher risks are determined will be given priority.
- We believe in direct supplier management where we can actively communicate our corporate policies and provide them with training to meet the policies and prevent the generation of any negative impact on natural, human, or economic resources.
- We believe in transparent, precise, and complete communication of financial and nonfinancial information with all stakeholders, considering their different needs and interests to be able to properly respond to each. Regular reports and documents showing the company's evolution in all its most significant aspects and following international and recognized standards will also be drafted. The accounts and data provided will be verified internally every year by the committee and by an independent, competent, and qualified auditor tasked with providing the board of directors and shareholders with an objective external opinion certifying that the financial and nonfinancial statements express a faithful image of the company's financial situation and results in all significant aspects.
- We intend to externally and periodically evaluate the company's ESG strategy and performance by means of rating agencies to be able to show its progress and alignment with the best practices available in this area.

- We protect personal data in all group companies, preventing data-subject infringements and releases.
- In addition to the purpose of maximizing transparency and in order to provide guidance and support to information security management in accordance with both legal and corporate requirements and applicable standards, a specific policy developed.
- The General Policy on Communication and Contact with Shareholders, Institutional Investors and Voting Advisors aims to establish a transparent and honest framework for the dissemination of economic-financial, non-financial, corporate and institutional information through all available means of the company ([here](#)).
- We aim to create partnerships to share knowledge and good practices and to work together with other agents to ensure speedier delivery of sustainability objectives.

2.4 ESG Risk Management

Fluidra is aware of the risks but also the opportunities provided by social, environmental, and governance aspects that could impact the business both positively and negatively. That is why we will perform internal analyses at least once a year to determine the likelihood and impact of each in order to better define the strategy, the ESG objectives, and the priority projects to be implemented.

2.5 Anticorruption and Bribery

- All our undertakings regarding potential conflicts of interest and corruption that could occur in our operations are set forth in the Code of Ethics ([here](#)) and anti-corruption policy.
- Fluidra has defined a specific policy to prevent infringements of the law, particularly acts that can be classified as offenses in the Criminal Code or applicable legislation at all times and in all places.

2.6 Training

- We are strongly committed to fostering stakeholder training, particularly by creating quality job opportunities and providing continuous training to employees to increase their employability within the company and outside of it, acting in accordance with our values and promoting equality, nondiscrimination, and inclusion.
- We promote employee knowledge of and compliance with company policies by using different communication channels. The company also promotes activities targeted at ensuring that the behavior of all employees is in keeping with the Fluidra culture and values.

- With the goal of ensuring that Senior Management exercises effective responsibility in ESG matters, regular training sessions are held to keep their knowledge up to date and to ensure good control of regular indicators, risks, associated opportunities, and other aspects that determine good decision-making.

2.7 Partnerships with Public Organizations

We cooperate with public authorities in drafting and applying policies and regulations to consider all points of view, enriching decision-making and refraining from any undue interference in local political activities.

3. ENVIRONMENTAL MATTERS

Fluidra understands the need to protect the environment and to that end will perform its activities in a way that contributes to the broadest objectives of sustainable development. In particular, the company undertakes to:

1. Set up and maintain an environmental management system appropriate for the company and which includes:
 - The compilation and evaluation of suitable and timely information on the impact that its activities have on the environment.
 - The setting of quantifiable targets and, where applicable, objectives related to improving its environmental outcomes and tapping its resources with the corresponding periodical review of these objectives. The objectives must be consistent with national environmental policies and international environmental commitments.
 - Regular follow-through and control of progress in meeting our environmental objectives and targets.
2. Bearing in mind cost considerations, business confidentiality, and copyright protection:
 - Provide the public and employees with suitable, measurable, and verifiable information on a regular basis about the potential impacts of the company's activity on the environment through progress reports on the improvement of our environmental outcomes.
 - Develop suitable and timely communication and outreach activity with communities directly affected by our environmental policies and their implementation.

3. Evaluate and incorporate into decision-making environment-related expected impacts associated with corporate procedures, assets, and services throughout their lifecycle to prevent the impacts or reduce them if they were inevitable.
4. Maintain emergency plans at our facilities designed to prevent, reduce, and control serious environmental damage arising from our activities, including in cases of accidents and emergencies, and establish mechanisms to immediately alert the competent authorities.
5. Constantly endeavor to improve the company's environmental outcomes and, where applicable, its supply chain, promoting the following activities:
 - Adopt technologies and operating procedures across all corporate areas that reflect the environmental quality of the company's best performance;
 - Develop and supply products and services that do not have negative environmental or safety impacts and that they reduce greenhouse gas emissions, are energy- and natural-resource efficient and can be reused, recycled, or safely eliminated;
 - Foster higher levels of customer awareness around the environmental implications of using the company's products and services, providing information on products (e.g., greenhouse gas emissions, efficient resource use, and other environmental aspects); and
 - Study and evaluate ways to improve the company's environmental outcomes in the long term, for example, by drafting emission reduction strategies, using resources efficiently, recycling, replacing or reducing the use of toxic substances, and employing biodiversity-related strategies.
6. Provide suitable training and education for employees on environmental matters including the handling of hazardous materials and prevention of environmental accidents, as well as in more general environmental management areas such as environmental impact assessment procedures, public relations, and environmental technologies.
7. Define specific environmental policies for the company areas that require them and express commitments in each area.
8. Partner with other companies and external agents to share knowledge and work to secure common environmental objectives through, for example, collaboration agreements or initiatives that boost environmental awareness and protection.

4. SOCIAL MATTERS

Fluidra is aware that human capital is one of the company's greatest values and strives to improve the quality of the work within the organization and ensure compliance with all worker rights. Our

suppliers, business partners, and customers are considered a fundamental part of our structure and we develop specific commitments, policies, and initiatives for each of them.

Fluidra also collaborates with the Fluidra Foundation to channel nonprofit management of the communities related to the company that could be at risk of exclusion, onboarding them in the company and working to reduce their vulnerability.

4.1 Human Rights

The company ensures compliance with internationally recognized human rights and the international commitments it signed up to with the United Nations Global Compact for all its workers in the countries where it operates and in the framework of pertinent national laws and regulations. In turn, Fluidra will at all times act in accordance with its culture and corporate values. We strive to:

- Respect our workers' human rights, ensure we do not breach the rights of other groups in the value chain, and address any negative impacts on human rights that could occur.
- Avoid causing negative impacts on human rights and resolve them if they do happen in the areas where we operate.
- Prevent and reduce negative impacts on human rights causally related to our activities and products through a business relationship with another organization, even when the company does not contribute to causing the impact.
- Exercise due diligence in human rights matters in accordance with the size, nature, and context of our activities and the seriousness of the risks of negative impacts on human rights.
- Have legal mechanisms and leverage them to help resolve negative impacts on human rights where they occur.
- Periodically review compliance with human rights in the supply chain and our activities where higher risks are identified.
- Maintain respect for human rights even if a country does not apply its pertinent national legislation, fails to respect its international human rights obligations, or infringes this legislation or international obligations. In countries where national laws and regulations violate internationally recognized human rights, the company will seek the means to respect them as far as possible, without infringing national law.
- The company is strongly opposed to modern slavery and will run regular training exercises and reviews to ensure no situation of this type occurs either in our activities or with the suppliers we work with around the world.

4.2 Employment and Labor Relations

As part of the applicable legal and regulatory provisions and practices in force regarding employment and labor relations, as well as applicable international labor standards (such as those promoted by the ILO), the company undertakes to:

- Fluidra 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.
- Provide information to workers and their representatives that will allow them to gain a precise and correct idea of the company's activity and results or, where applicable, the overall corporate situation.
- Authorized workers' representatives are permitted to negotiate questions concerning collective agreements and employee/business relations and parties are permitted to consult regarding matters of mutual interest with authorized employer representatives to adopt decisions with respect to these questions.
- Contribute to the effective abolition of child labor and take immediate and effective measures to urgently ensure it is banned and dismantled.
- Cooperate in the exclusion of all types of forced labor and take appropriate measure to prevent it.
- Create work environments where respect, equality and safety prevail. All people, regardless of their race, gender, religion or ideology have the same opportunities of access to the organization and personal treatment, to develop their professional potential, following the principles and values of the group.
- Promote a business culture based on equal treatment and opportunities between men and women.
- Promote equal opportunities, both to access our organization, and to participate and promote professionally within it (further detail [here](#)).
- Respect standards of employment and labor relations that are no less favorable than those practiced in companies with similar conditions in the host country.
- In developing countries where the company operates, where there may not be any employers with similar conditions, offer the good salaries, benefits, and work conditions possible within the framework of public policies to satisfy the essential needs of workers and their families.

- To the greatest extent possible, local personnel will be employed for the activities and will be provided with the best conditions in order to improve qualification levels, in partnership with the workers' representatives and, where applicable, the competent public authorities.
- Ensure the adoption of the measures needed to guarantee the health and safety of the people located at the company's facilities.
- When the different companies that make up the Fluidra Group plan a change in activities that could have a significant impact on the means of subsistence of their workers, specifically in the case of the closure of an organization entailing collective dismissals or redundancies, the workers will be given reasonable notice of these changes and, where applicable, the competent public authorities will also be notified and the company will work with the workers' representatives and public authorities to reduce the adverse impacts as far as possible.

4.3 Community Engagement

- Stimulate local capability generation by engaging closely with the local community, including the interests of businesspeople and at the same time developing the company's activities on internal and external markets in a manner compatible with the need for good business practices.
- Fluidra is committed to improving the well-being of vulnerable people through its foundation with which it will invest in projects related to culture, water management and enjoyment, community development and training, among others.

4.4 Customers

We recognize that both customers and users, collectively customers, are critical to the long-term success and sustainability of our company. Customer collaboration is a core value of how we approach the market:

- We are committed to measuring and publicly disclosing the annual carbon footprint of the carbon emissions of our products as a result of use by our ultimate customers and users.
- Our strategy, business model and the decisions we make treat clients fairly and do not disrupt the integrity of the marketplace.
- We work closely with our clients to understand their needs; we actively listen to them and ask the critical questions.
- Our products are designed to meet the different needs of our customers in a competitive marketplace.

- Our products and services provide a balanced exchange of value between Fluidra and our clients. We work to establish a long-term relationship via a winwin approach.
- Throughout our sales and services cycle we are transparent and customer-focused.
- Our governance framework provides effective oversight of how we treat clients fairly and uphold the integrity of the marketplace.
- We are committed to the ongoing quality and safety of our products and services.
- We stand behind our products and customers with warranties and after sales support.
- We increasingly promote innovation and investment in products and services that contribute to sustainable development, with solutions that allow our clients to contribute to the well-being of people and society in general, to better management of natural resources or to the fight against Climate Change.
- Carry out responsible project management, aimed at improving customer satisfaction and identifying, evaluating and responding to all of their needs.
- We work to comply with all safety and regulatory standards for the production, commercialization and use of our products and services.
- We aim to Promote and expand communication channels that allow all customers to communicate with the company for possible incidents or any aspect related to Fluidra's products or services. Maintain responsible, fluid and two-way communication with the company's stakeholders: shareholders, investors, clients, employees, authorities, regulators, workers' representatives, suppliers, partners, knowledge institutions, foundations and society in general.

4.5 Other policies

Fluidra has a set of standards that seek not only to comply with applicable regulations, but also to incorporate the best practices and national and international recommendations on sustainability. All group policies will incorporate the principles set in this ESG policy.