

CRIME PREVENTION AND CONTROL POLICY

Fluidra Group

Global Internal Audit & Compliance

Approved by the Board of Directors on December 15th, 2023

The Fluidra logo is displayed in a bold, white, sans-serif font. It is centered within a large, white, abstract shape that resembles a stylized drop or a speech bubble, set against a dark blue background. The shape has a curved top and a wavy bottom edge.

FLUIDRA

Document information

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| Title | Crime Prevention and Control Policy |
| Category | Policy |
| Description | This Policy constitutes a cornerstone for the Fluidra Group in the prevention of possible criminal offences that may be committed within the Company in the different areas in which it carries out its activities. |
| Scope | Applicable to all Fluidra companies |
| Sponsor | Global Internal Audit & Compliance |
| Effective date | February 27th, 2024 |
| Version | 2.0 |
| Last review date | December 15th, 2023 |

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1. Introduction

Fluidra S.A. (hereinafter, "**Fluidra**" or the "**Company**"), is the parent company of a group of companies whose main activity consists of the manufacture and marketing of accessories and specific machinery for swimming pools, irrigation and water treatment and purification (hereinafter, any of these entities shall be referred to individually as "**Fluidra**" and, as whole, shall be referred to as "**Fluidra Group**").

The Crime Prevention and Control Policy (hereinafter, the "**Policy**") stems from **Fluidra's Code of Ethics** and is the standard on which Fluidra's Crime Prevention Model is based.

It has been drawn up on the basis of Organic Law 10/1995, of 23 November, of the Criminal Code (and its subsequent amendments); Circular 1/2016 of the State Attorney General's Office on the criminal liability of legal persons; the case law of the Supreme Court in this area and, lastly, the main best practice standards (UNE 19601 and UNE-ISO 37301).

In accordance with the provisions of the aforementioned regulations, the Policy constitutes a cornerstone for the Fluidra Group in the prevention of possible criminal offences that may be committed within the Company in the different areas in which it carries out its activities. This Policy has been approved by the Company's Board of Directors in the exercise of its function of approving the Company's general policies and strategies, in accordance with the provisions of the Regulations of the Board of Directors.

The Policy helps to reinforce the Company's commitment to zero tolerance of any criminal act or conduct that goes against the principles set out in the **Company's Code of Ethics**.

2. Scope of application

This Policy shall apply to all employees, managers and directors of the Fluidra Group in all activities arising from their position or duties, including those investee companies over which the Company has effective control, within the limits provided for in the applicable regulations.

The contents of this Policy may extend to persons or entities that do not belong to Fluidra, whenever they have a business or professional relationship with the Company and their actions represent a risk or liability for the Company or may directly or indirectly affect its reputation or good name, and provided that the agreement is adopted at the appropriate level.

3. General Principles

The basic aim of Fluidra's Crime Prevention Model is to promote a true ethical business culture, by establishing all the surveillance and control measures within its reach to prevent the commission of crimes within the Company.

Accordingly, Fluidra has established the following general principles that act as guidelines of behaviour for Fluidra and all persons described in the previous section:

3.1. Compliance with the Law

All employees of the Fluidra Group accept as their own the principles of respect for the law, integrity, honesty and transparency established in the Company's Code of Conduct.

All those who are part of the Fluidra Group undertake to act in accordance with current laws through ethical and upright behaviour, avoiding any unlawful conduct and, in particular with regard to this Policy, any kind of criminal conduct.

Fluidra is committed to implementing the range of measures necessary to prevent and detect the commission of criminal acts in all areas of the Group's activities in which its directors, managers and employees are involved and in its relations with third parties, thereby promoting a preventive culture based on the principle of "zero tolerance" towards the commission of unlawful acts.

3.2. Communication Channels

Fluidra has set up suitable internal channels to encourage the reporting of possible irregularities, which guarantee both the rights of informants and those of the persons under investigation.

One such Communication Channel is Fluidra's Confidential Channel, which is open to employees, customers, suppliers and any other stakeholders for the purpose of raising any questions or suspicions of criminal activity confidentially and/or anonymously. Fluidra's Confidential Channel has its own internal regulations, which have been drawn up in an environment of transparency and compliance with applicable laws.

3.3. Prohibition of Retaliation

Fluidra will not tolerate any kind of threat or retaliation against those who make use of the

Communication Channels set up to report or communicate an activity that might be considered criminal or is suspected of being criminal, or against those who participate or assist in its investigation, provided that they act in good faith.

Likewise, Fluidra will not tolerate any type of reprisal against any employee who refuses to undertake any action that could be considered a criminal offence, and has set up the appropriate means for any employee of the Group to be advised on this matter at all times.

3.4. Crime Prevention Model

Fluidra has developed a Crime Prevention Model to identify, assess and manage the risks of non-compliance that may arise in the Group's activities, operations, products and services, as well as to identify controls and integrate them into the organisation's processes, through internal policies, management standards and action procedures.

Fluidra will regularly review the content of the Crime Prevention Model, the effectiveness of the controls included in it and the Internal Regulations for its implementation in order to detect any possible incidents and breaches, and to ensure that the requirements of any applicable criminal laws, recommendations and best practices in force at any given time are met.

3.5. Training

Fluidra has implemented appropriate awareness and training programmes for the Group's employees on the duties required by applicable laws at regular intervals to ensure that their knowledge of crime prevention is kept up to date.

In particular, training will be provided on the principles set out in Fluidra's Code of Ethics, the Crime Prevention Model, the Anti-Corruption Policy and any other policy and regulation developed for this purpose.

3.6. Disciplinary System

Fluidra shall penalise, in accordance with the provisions of applicable laws or the regime provided for in the corresponding Collective Bargaining Agreements, any conduct that goes against applicable laws or the Internal Policies, Procedures and Rules that make up the Crime Prevention Model, as well as any action that contributes to preventing or hindering the discovery of possible criminal or unlawful acts. Likewise, the laws applicable in the different jurisdictions in which Fluidra carries out its activities shall be taken into account.

4. Confidential Channel

Should there be any knowledge, evidence or suspicion of corrupt practices within Fluidra or of the existence of a record of corruption or of a breach of the Policy, such facts must be reported through the Confidential Channel, **available at the following link:**

[ACCESS FLUIDRA'S CONFIDENTIAL CHANNEL](#)

Fluidra will ensure the **confidentiality and security of whistleblowers** and will **not take or permit any retaliation or adverse consequence** against anyone who, in good faith, makes use of the Whistleblower Channel.

Fluidra regularly disseminates the content of the Anticorruption Policy to all its employees through informative actions and training sessions.

5. Approval, review and supervision

This Policy came into force on **February 27th, 2024** by approval of the **Fluidra Group Board of Directors**.

The Global Internal Audit & Compliance shall supervise the extension of this Policy to the subsidiaries and entities of the Fluidra Group that are part of its scope of application. The Global Internal Audit & Compliance Department, as the responsible for this Policy, shall periodically supervise its application.

At least once a year, or upon the occurrence of any event that requires a change in this Policy, the Global Internal Audit & Compliance, as the responsible for it, shall proceed to carry out the review, approval, and extension processes to the subsidiaries, as applicable.

6. Review history

| Version | Date | Control changes description | Sponsor |
|---------|---------------------|-----------------------------|------------------------------------|
| 2.0 | December 15th, 2023 | Approval of version 2.0 | Global Internal Audit & Compliance |
| | December 31st, 2025 | Document design update | Global Internal Audit & Compliance |

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