

HEALTH, SAFETY AND ENVIRONMENTAL POLICY

Fluidra Group

HSE Department

Approved by the Board of Directors on February 27th, 2024

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 water droplet or a wave, set against a dark blue background. The shape has a curved top and a wavy bottom edge, extending from the left side towards the right.

FLUIDRA

Document information

Title	Health, Safety and Environment Policy
Category	Policy
Description	To guarantee the health and the safety of employees, customers and any other person involved in the Group's business activities, as well as protecting the environment.
Scope	Applicable to all Fluidra companies
Sponsor	HSE Department
Effective date	April 8th, 2019
Version	2.0
Last review date	February 27th, 2024

Index

1. Purpose and scope of application

- 1.1.** Purpose
- 1.2.** Scope of application

2. Our Commitments

- 2.1.** We prioritize the goal of protecting health, safety and the environment
- 2.2.** We protect the health and safety of our employees and third parties
- 2.3.** We take care of the environment
- 2.4.** We consider HSE implications in the products and technologies we develop

2.5. We are continually building a network of responsible business partners

2.6. We protect and preserve biodiversity that provides ecosystem services or benefits to people

2.7. We are committed to fight against deforestation through innovative and sustainable solutions

3. Responsibilities

4. Waivers & exceptions

5. Approval, review and supervision

6. Review history

1. Purpose and scope of application

1.1. Purpose

At Fluidra, sustainability translates into risk management to guarantee the health and the safety of employees, customers and any other person involved in the Group's business activities, as well as protecting the environment.

Safety, health and environment Policy reflects the Group's commitment to support sustainable management, based on the systematic assessment of risks in the product manufacturing process, in the product itself and in its life cycle, in addition to minimizing the use of natural resources.

This Policy extends Fluidra's commitments on Health, Safety and Environment described in the Global ESG Policy, the Code of Ethics and the Code of Ethics for Suppliers.

1.2. Scope of application

This Policy applies to all the companies within Fluidra's Group worldwide, including all the companies in which Fluidra S.A. holds, directly or indirectly, the majority of shares, interests or voting rights and / or the companies in which it has appointed or can appoint the majority of the members of their corporate management teams, in such a way that it effectively controls the company.

This Policy also applies, to the extent relevant, to the joint ventures, temporary joint ventures and other equivalent associations led by Fluidra S.A. at any given time.

The Health, Safety and Environment Policy covers all operations, people and locations involved in Fluidra's activities, including own production operations and business facilities, distribution and logistics activities, Fluidra's products and services, and activities performed by suppliers, service providers, contractors or other key business partners.

2. Our commitments

One of our commitments is to fulfill the local and international laws, being more restrictive with our standards and procedures, wherever it would be possible.

We consider the protection of the health and safety of our employees, the broader community and the environment as a fundamental value and guiding objective for our company.

We are committed to providing for employee health and safety, protecting the communities in which we operate and continually striving to minimize our environmental footprint.

We aim to be a Health, Safety and Environment (HSE) leader and are taking the following actions to support this goal:

2.1. We prioritize the goal of protecting health, safety and the environment

- Protecting the health and safety of our employees, the broader communities in which we operate and the environment is a fundamental value and goal to which we ascribe the same level of importance as other key objectives within our organization.
- Although management is responsible for implementing and maintaining best practices to protect health, safety and the environment (HSE), as well as is responsible for setting and demonstrating good behavior in this regard, employees must take it upon themselves to understand and respond to HSE matters and ascribe to them the same level of importance as they do other key objectives within the organization. All employees are expected to comply with their duties while scrupulously following the company's guidelines at all times in the spirit of social and environmental responsibility.

2.2. We protect the health and safety of our employees and third parties

- We promote programs to maintain and improve the health and well-being of our employees, third parties and contractors such as by offering smoke-free workspaces at our offices world-wide.
- Employees are offered a number of voluntary health programs. We offer our employees and third parties safe working conditions and we strive to protect them against possible dangers to their health. Before carrying out a potentially hazardous job, we require that a risk assessment and analysis of the processes involved and workplace be conducted.
- Management is responsible for conducting risk assessments and developing protective measures in cooperation with employees. Moreover, local companies will be required to prioritize and integrate actions plans with quantified targets to address those risks.
- Employees, third parties and contractors must be familiar with local safety requirements, respect them and comply with them. For example:
 - Use appropriate personal protection and/or equipment when necessary.
 - Respect alarms and safety warning signs.
 - Take part in observation and training programs, such as mandatory training on local safety practices, safety training for drivers and programs that address safe job-related behavior.
 - Report actions and conditions that are not safe and that pose security risks.
- Employees, third parties and contractors are expected to help monitor their colleagues and inform them of any behavior that is unsafe.
- Fluidra will establish quantitative annual targets for improving Health & Safety performance metrics, and will report on its progress in the Integrated Annual Report.

2.3. We take care of the environment

We strive to use natural resources responsibly, reduce contamination and minimize our environmental footprint, both in our daily activities as well as in the products we create through the following initiatives:

- **Efficient use of energy:**
 - Employees should always consider the most efficient use of energy and look for opportunities to reduce energy consumption in their workplace. This includes turning off lights and lab / office equipment when they are not being used.
 - The directors of quality and facilities must consider the most efficient use of energy within the acceptable intervals according to regulatory or compliance standards.
 - Energy efficiency and the use of renewable energy are considered in light of new and proposed projects. Preference is given to projects that improve energy efficiency, or promote switch to renewable contracts, the installation of solar panels, among others
- **Reduction of greenhouse gas emissions:**
 - Employees should minimize travel whenever possible and/or prioritize more sustainable means of transportation (e.g. using train instead of plane) for short trips. Choose video or teleconference options in cases where they are available and acceptable to the business.
 - Fluidra Group companies must promote vehicle policies where, whenever possible, the use of vehicles with lower CO2 emissions is prioritized, opting for electric and hybrid vehicles over conventional vehicles.
- **Recycling and reducing waste and hazardous waste:**
 - Employees must minimize waste through recycling in all cases where there are local recycling systems in place. They must consider the environment before printing emails, attachments to emails or other work-related documents.
 - Circularity: Products should be designed considering their repairability, their useful life, and their recyclability at the end of this life.
 - Process developers must incorporate techniques to reduce and recycle materials, especially plastic, exploring the option to use the product with the highest possible percentage of recycled material.
 - Production employees should look for opportunities to reduce waste associated with wastewater discharges.
 - Fluidra is committed to manage the disposal of hazardous waste appropriately.
- **Responsible use of water:**
 - Employees should always consider how to use water most efficiently and identify opportunities to reduce water use in the workplace and minimize its contamination during the process.

2.4. We consider HSE implications in the products and technologies we develop

- Employees are expected to follow a clear development process, which includes impact evaluations and HSE risk analysis, in an effort to ensure that the benefits of a project outweigh any residual risk to the community and environment.
- Employees work to integrate considerations regarding HSE into the development of products, processes, procurement, manufacturing and major projects at an early stage and product disposal.

2.5. We are continually building a network of responsible business partners

- Third-party partners and suppliers must meet HSE requirements, based on international standards, global and local laws, and accepted good practices.

2.6. We protect and preserve biodiversity that provides ecosystem services or benefits to people

- We try to evaluate and minimize the environmental impact of our activities and products, to minimize the consequent impact on biodiversity.
- Healthy ecosystems help to maintain the Earth's natural processes, so the biggest impact of biodiversity is on the environment (soil turnover, water purification, pest control and other processes wouldn't be possible without the species that support them).

2.7. We are committed to fight against deforestation through innovative and sustainable solutions

- We work on and with recycled products, we promote waste recycling in our facilities, and we work to increase the awareness in our circle and community.
- We want to reuse whenever possible, and recycle as much as possible the wood generated as waste in our activities.
- In production processes where wood is a raw material, we want to ensure that it comes from safe sources and suppliers committed to non-deforestation, through the appropriate certification.

3. Responsibilities

The **Board of Directors** of Fluidra recognizes the need to provide the Company with an Internal HSE Policy. It approves and endorses the Policy after the MAC approval.

Management Advisory Committee (MAC): Will approve the Policy and provide visible leadership helping to build a strong culture.

Global HSE Department: Led by the HSE Global Director, who reports to the Global Operations Director, will be responsible for designing, updating and distributing Fluidra's HSE Policy submitting it to MAC and Board approval. It also develops procedures, supervise their implementation, defines and monitors objectives and global action plans. Regional HSE Business Partners, provide support to the different companies in the region, monitoring KPIs and procedures implementation, consolidating and reviewing data and promoting HSE through communications campaigns.

Directors, managers and employees: The directors, managers and employees in each company are responsible for ensuring that these guidelines are followed.

4. Waivers and exceptions

Not applicable.

5. Approval, review and supervision

This Policy came into force on **April 8th, 2019** by approval of the **Fluidra Group Board of Directors**.

The HSE Department 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 HSE 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 HSE Department, 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
1.0	April 8th, 2019	Approval of version 1.0	HSE Department
2.0	February 27th, 2024	Approval of version 2.0	HSE Department
	December 31st, 2025	Document design update	HSE Department

FLUIDRA