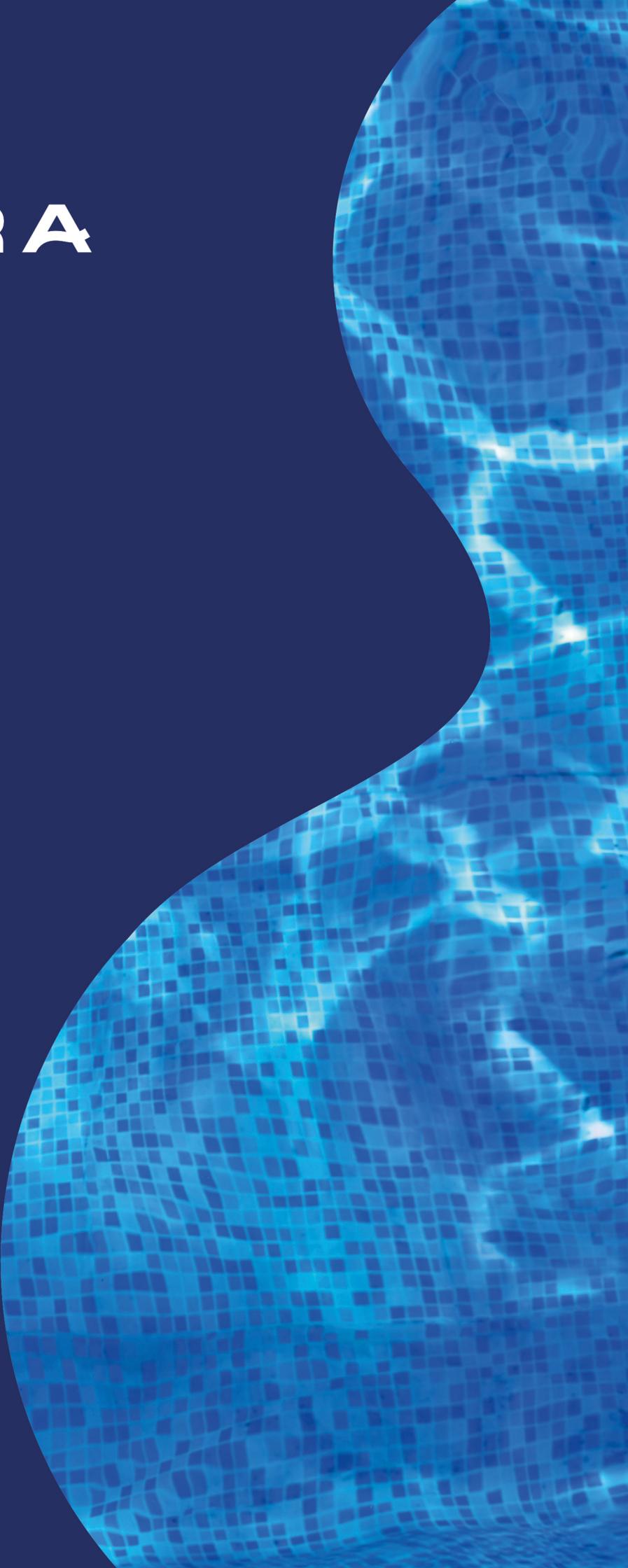


# FLUIDRA

## CODE OF ETHICS FOR SUPPLIERS

Fluidra Group

May 2024



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## 1. MESSAGE FROM THE EXECUTIVE CHAIRMAN AND THE CEO

Since our very beginnings in 1969, those that have chosen to work alongside us have conducted their business in alignment with a clear premise and basic tenets: 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 of all entities we engage with.

These tenets have been at the core of Fluidra since day one, and since the merger with Zodiac, they remain the foundation of who we are today, and have made us the global leader in pool and wellness.

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 strongly believes in disseminating its corporate values and principles with its stakeholders, in an endeavor to encourage them to behave ethically and responsibly. This commitment positions us to assure our customers that our products are manufactured in an environment that upholds human rights and environmental standards.

Given the diversity of countries, sectors, and regulations where we operate, it's crucial for us to

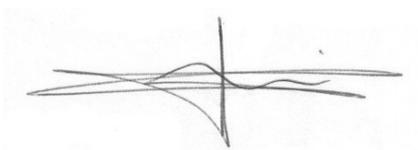
establish a framework to guide the actions of the suppliers who work with Fluidra.

Clear and effective communication with our suppliers is vital for building strong, enduring relationships grounded in transparency and integrity, fostering mutually beneficial partnerships. Suppliers, along with other stakeholders, provide valuable insights enabling us to enhance our business, streamline production processes, and improve our products and services.

For this reason, Fluidra has developed this Code of Ethics for Suppliers, establishing a commitment between Fluidra and its suppliers to uphold the principles outlined in the International Bill of Human Rights, the Declaration of the International Labor Organization (ILO), the ten principles of the United Nations Global Compact, as well as in compliance with current legislation. These principles are essential for fostering and sustaining our business relationships, both now and in the future.

On behalf of the Board of Directors and ourselves, we would like to thank you in advance for your commitment and your endeavors in promoting our principles.

Kindest regards,



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**Eloi Planes**  
*Executive Chairman*



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**Jaime Ramírez**  
*Chief Executive Officer*

## 2. WHY THIS CODE? OUR SHARED RESPONSIBILITY

### 2.1. Scope of application

Fluidra's Code of Ethics for Suppliers (sometimes referred to as "Code") provides the guidelines which must be followed by all the Fluidra Group suppliers<sup>1</sup>, and their employees, in the performance of their business relationships with Fluidra worldwide.

Given the extensive nature of the Fluidra Group's activity, **this Code does not cover all the situations that may arise** for any of our suppliers, but it does set out **clear guidelines for conduct**, aligned with Fluidra's values. Your obligation is to

apply the principles underlying the Code. If in a specific case you have a question about how to proceed, or a question about interpreting its content, we encourage you to discuss this with your Purchasing Representative at Fluidra or use the Confidential Channel.

The Code **neither substitutes nor cancels the applicable legislation of each country**, nor the international community, in matters of administrative, civil, criminal, employment or commercial law.



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<sup>1</sup> For the purposes of this document, by suppliers we mean: suppliers, contractors, subcontractors and other third parties that supply goods and services to Fluidra, including their employees.

Fluidra Group suppliers have the responsibility:

- **To know and apply** the standards of behavior set out in this Code, as well as any other applicable Fluidra regulations set in the applicable contracts, agreements or purchasing orders.
- **Inform** their employees about the principles of this code, as well as to **seek contractual assurances** from direct and indirect business partners (to the extent that their activities are part of Fluidra’s chain of activities) to ensure its compliance.
- **Not to tolerate** in the performance of the business relationship with Fluidra, any behavior that departs from the Code or that may contravene the internal regulations that implement it, or the applicable law.
- **Collaborate with Fluidra** to prevent or mitigate any potential adverse impact on people and the

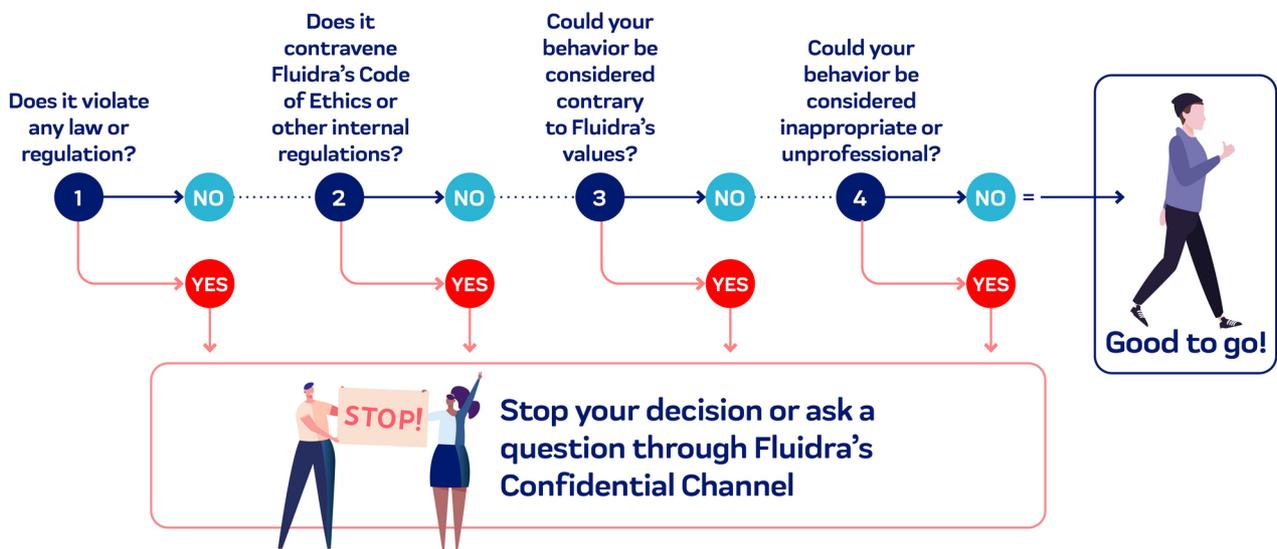
environment that could occur within its chain of activities, as well as to bring any actual adverse impact to an end, or minimize the extent of such impact, in particular where no other measure is suitable or effective.

- **Report through the Confidential Channel** about any action or situation relating to the Fluidra Group which might be contrary to this Code, according to the procedure defined in [chapter 3 “Speak Up”](#).

## 2.2. Decision making in the event of ethical dilemmas

Before making a decision, Fluidra Group suppliers shall ask themselves the following questions **key questions**:

**In the context of your work, if you have doubts about how to proceed in a given case, you should ask yourself the following questions before making a decision:**



## 3. SPEAK UP

Fluidra encourages its stakeholders to speak up if they know of or suspect conduct or occurrences that violate the Law and/or Fluidra’s Code of Ethics or related policies.

To this aim, the Company makes the **Confidential Channel** available to everyone, which can be accessed through the direct links available on the Fluidra’s corporate website and MyFluidra intranet. Additionally, the Confidential Channel can also be reached through the following addresses:

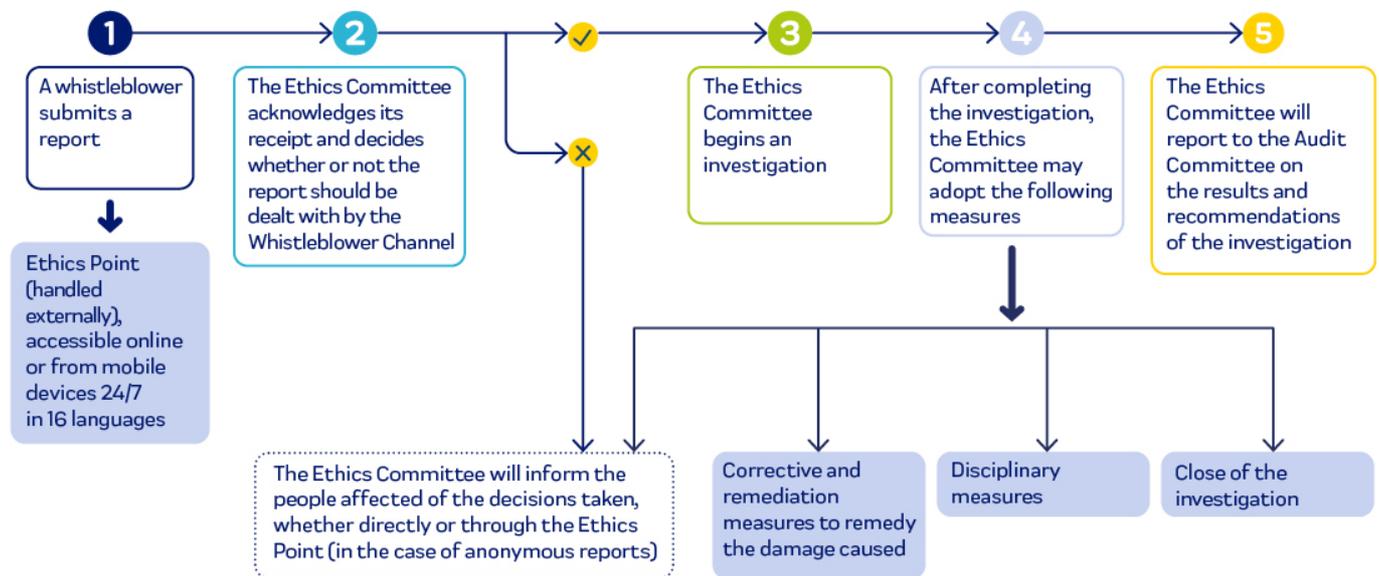
- **Online:** fluidra.ethicspoint.com
- **Mobile:** fluidramobile.ethicspoint.com

The Confidential Channel can be used to:

- **Raise queries and/or doubts** about the interpretation and application of the Code of Ethics related policies and the law.
- **Report suspected or actual misconduct** under the terms of the Speak Up Directive.

The Fluidra Confidential Channel is hosted by a third-party whistleblowing hotline service provider. All submissions will be handled in confidence to the extent possible to engage in a full discrete investigation, decisions will be made on well-founded grounds, and the privacy of the persons involved will be respected, as possible. Reports to the Confidential Channel may be made anonymously.

### Operation of the Confidential Channel



## 4. OUR COMMITMENTS AND THOSE OF OUR SUPPLIERS

### 4.1. Committed to People

As members of the United Nations Global Compact, Fluidra is committed to supporting and respecting the protection of internationally recognized fundamental human rights within its sphere of influence, as well as ensuring that it is not complicit in the violation of these rights.

Through this Code, the Company develops the Human Rights commitments contained in the **Sustainability Policy**. Fluidra Group suppliers, without exception, are obliged to respect the principles of the International Bill of Human Rights and the International Labor Organization's (ILO) fundamental conventions and the Declaration on Fundamental Principles and Rights at Work. The Company also requires its employees and customers to follow these principles.

#### Respect for people

Everyone has the right to be respected and treated with dignity. Fluidra promotes relations based on respect, fairness, and courtesy with all its employees, customers, suppliers, authorities, and other individuals it comes into contact with in its activities.

Fluidra does not tolerate any harsh or inhumane treatment, including violence, gender-based violence, harassment (including sexual harassment, mobbing, and bullying, among others), corporal punishment, mental or physical coercion, intimidation, public embarrassment or verbal abuse of employees, nor should there be the threat of any such treatment.

We expect all of our suppliers' employees, contractors and sub-contractors to act in accordance with Fluidra values and be committed to respecting all individuals and treating all with dignity.

#### Ensuring equal opportunities and non-discrimination

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.

All Fluidra Suppliers are required to refrain from any form of discrimination or other adverse actions on the basis of race, color, age, sex, sexual orientation, gender identity and expression, ethnic or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status, or any other basis prohibited by law, including in hiring and employment practices such as wages, promotions, rewards and access to training and development opportunities.

#### Abolition of all forms of modern slavery

Everyone has the right to carry out their work freely and voluntarily, without being forced or coerced into working. Fluidra is against all forms of modern slavery, including slavery, forced labor, forced marriage, debt bondage, human trafficking, and involuntary prison labor. All of Fluidra's suppliers, contractors, sub-contractors and any organization in Fluidra's value chain must not partake in any form of modern slavery.

Fluidra expects suppliers to provide their employees with a written information in a language they can understand. The employees of our suppliers must maintain possession of their government-issued identification such as passports, work permits, or immigration documents. Fluidra's Suppliers shall not limit workers' freedom of movement unreasonably, nor require workers to pay recruitment fees. Absent enforceable contractual obligations to the contrary, workers shall be able to resign freely when they so desire.

#### Abolition of child labor

Fluidra has a policy abolishing the use of child labor, including worst forms of child labor. Fluidra expects its suppliers to work to eradicate child labor, in line with the ILO Agreements and Recommendations in this topic.

## Working hours and rest periods

Fluidra expects its Suppliers to comply with local laws and collective bargaining agreements (where applicable) regarding working hours and rest periods. Working hours must not exceed the maximum set by local law, and all overtime must be voluntary.

## Fair remuneration

Fluidra is committed to fair remuneration and expects its Suppliers to follow the same principles. Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted.

Fluidra's suppliers are expected to pay a fair and equal wage, including benefits and leave, that meet the basic needs of workers, and strive for a discretionary income in compliance with applicable laws and/or relevant collective agreements. Fluidra's suppliers are also expected to minimize and mitigate structural differences in pay and benefits between genders for equal or comparable work.

## Occupational Health & Safety

Health and safety at work is one of Fluidra's primary concerns, so we require our Suppliers to 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.

We expect our suppliers to ensure that: the workplaces, machinery, equipment and processes under their control are safe and without risk to health; the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and where necessary, adequate protective clothing and protective equipment are provided to prevent risk of accidents or of adverse effects to health. Detailed information is available in our **[Health and Safety Policy](#)**.

## Right to association and collective bargaining

Fluidra's Suppliers must comply with and respect all applicable laws and ILO core conventions related to the rights of workers to form and join trade unions of their own choosing, bargain collectively, engage in peaceful assembly, as well as respect the right of workers to refrain from such activities.

Supplier's employees and/or their representatives must be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, retaliation, reprisal, intimidation, or harassment. When local laws or circumstances restrict these rights, Fluidra's suppliers are expected to pursue other ways of engaging in meaningful dialogue with their workers on employment issues and workplace concerns.

## Right to privacy and personal data protection

Fluidra is committed to the right to privacy and the protection of the personally identifiable information of all stakeholders, including employees, customers, and vendors, according to the applicable laws and regulations. Suppliers must take measures to safeguard the personally identifiable information processed by any employee in the performance of their duties and to mitigate risk of unauthorized use or disclosure of personally identifiable information.

## Community Engagement

Suppliers should respect and uphold the rights of local minorities, ensuring fair and equitable treatment in all aspects of their operations.

Fluidra aims to make a net positive contribution to our communities, people, and environment. We encourage our suppliers to contribute to the economic development of the local communities and support their sustainable development through partnerships with local organizations, non-profits, and community groups, and support local environmental initiatives that contribute to the overall sustainability and health of the community.

## 4.2. Responsible conduct in the marketplace

### Appropriate use of Assets

Suppliers are required to maintain the confidentiality of any shared information and ensure that their security measures are on par with Fluidra's. The obligation of confidentiality continues even after the business relationship ends. The internal business owners are responsible for enforcing security measures, which the Suppliers must adhere to. Failure to comply with data protection or confidentiality obligations may lead to the immediate termination of the business relationship.

### Anti-corruption and bribery

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.

### Money laundering prevention

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 shall likewise comply at all times with the laws against money laundering that are in force in any competent jurisdiction and shall cooperate with the authorities responsible for combating money laundering or the financing of unlawful activities.

### Intellectual and industrial property rights

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.

### Legal compliance

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

### Conflicts of interest, limitations and incompatibilities

Fluidra's Suppliers must ensure that their employees do not have any conflict of interest or loyalty at work.

### Transparency and truthfulness of information

Fluidra will ensure the truthfulness and transparency of its information, which will be the duty of all Members or those who collaborate with it (including Suppliers).

Fluidra's economic and financial information – particularly its financial statements – must be a true and faithful reflection of its legal status, finances and assets and in accordance with accounting laws and principles. For this purpose, Fluidra undertakes to implement and maintain an appropriate internal control system on financial reporting. The dissemination of untrue information, either internally or externally, is strictly forbidden.

### Confidentiality and information 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 adopting the necessary 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.

## **Fair competition & antitrust**

Fluidra is committed to strict compliance with all fair competition and antitrust laws. Fluidra's policy is to compete vigorously and effectively, but also ethically, fairly, and lawfully at all times. Accordingly, Fluidra's suppliers must adhere to the principles of fair competition and follow the relevant antitrust and fair competition laws in the jurisdictions they operate.

## **Customs and international trade control regulations (sanctioned territories)**

Fluidra respects all applicable customs and international trade regulations. Fluidra will not engage in transactions with sanctioned countries, persons, and prohibited end users, nor cooperate with any restrictive trade practice or boycott that is prohibited or penalized by the European Union ("EU") and its Member States; the U.S. Department Treasury's Office of Foreign Assets Control ("OFAC"); the United Nations Security Council ("UN"); and any other relevant sanctions authority (collectively "Trade Sanctions Laws").

## **Lobbying activities and trade associations**

Lobbying is a means of influencing government action and can be permissible when done transparently and in accordance with governmental regulations. All lobbying done by Fluidra suppliers, either directly or through third parties, must be done lawfully and align with Fluidra values and Fluidra's Code of Ethics for Suppliers. Suppliers must ensure both transparency and integrity when conducting lobbying practices.

Trade associations, also referred as business or industry associations or groups), represent the interests of a specific industry and, therefore, can also be a powerful source of influence on public policy. Fluidra Suppliers must ensure that these kinds of memberships do not contradict Fluidra's values and commitments, particularly on climate change.

## **Product and material quality, safety, and compliance**

Fluidra verifies and ensures that the products it manufactures and/or distributes comply with applicable laws, directives and regulations. This includes REACH, RoHS, POPs, WEEE, EU Battery directive, among other requirements regarding

restrictions and prohibitions of specific substances in our products. When required by applicable legislation, Suppliers shall make available to Fluidra the documentation that allows evidence of compliance with these regulations.

Fluidra is also committed to sourcing minerals responsibly and minimizing negative impacts on the environment and human health caused by hazardous substances. Suppliers shall take appropriate steps to identify the use of Minerals from Conflict-Affected and High-Risk Areas (tantalum, tin, tungsten, and gold) and establish appropriate due diligence mechanisms, according to relevant international standards, to ensure risks identification, as well as the implementation of mitigation and remediation measures up the supply chain, according to relevant international standards.

The Supplier shall establish and implement policies and comply with regulations to prevent the use of materials and minerals sourced through any illegal and unethical means. The supplier shall adopt a policy and exercise due diligence in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

The organization also commits to apply high safety and quality standards, and to disclose and resolve any instances in which risks are detected.

## **Production control**

Manufacturers and suppliers shall not assign any work to third parties without prior written authorization from Fluidra. Those who outsource any work shall be responsible for the enforcement of the Code by these third parties and their employees.

## 4.3. Environmental stewardship

All of Fluidra's suppliers must be aware of, accept and act in line with the criteria on respect for the environment and sustainability in strict compliance with all local regulations on the protection of the environment.

Fluidra is firmly committed to the preservation of the environment and respect for the balance of natural systems. It thus undertakes to promote and encourage activities that respect the environment for the benefit of future generations.

We expect our suppliers to share our corporate commitments by managing their operations responsibly, including taking action against climate change and actively working on reducing environmental risks and impacts associated with their operations as well as supply chains. Please review Fluidra's **Sustainability Policy** for additional information.

### Permits and reporting

Suppliers shall follow applicable local, national, and international environmental laws. Suppliers must obtain and keep current all required environmental permits, approvals, and registrations, follow their operational and reporting requirements, and provide said documentation to Fluidra upon request.

We encourage all suppliers to go beyond compliance obligations and integrate additional environmentally sustainable practices throughout the company.

### Energy consumption and greenhouse gas emissions

Fluidra expects its suppliers to be responsible in their energy consumption and the reduction of greenhouse emissions.

We encourage our suppliers to look for methods to improve energy efficiency and minimize their energy consumption and greenhouse gas emissions. We also expect our suppliers to establish time-bound emission reduction goals that are aligned with Fluidra's carbon emissions reduction goals.

### Water

Suppliers will commit to sustainable use and management of water resources in all areas that it

has control over, and to support and encourage others where it can meaningfully do so.

Suppliers must prevent unpermitted discharges and mitigate the potential impacts of such discharges and flooding caused by rainwater run-off.

Fluidra is committed to employ best practice approaches to sustainable use and management of water resources.

### Biodiversity

Our suppliers must respect the balance of natural systems.

We encourage our suppliers to actively participate in the protection of local biodiversity, commit to land conservation (to the extent possible) and operate in a way that prevents deforestation. We encourage our suppliers to assess the impact of their operations, products and services on the local biodiversity, and wherever possible, make a positive contribution to biodiversity.

Fluidra aspires to positively contribute to sustainable and resilient communities and ecosystems through the protection of biodiversity.

### Waste management

Suppliers must implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle waste according to typologies and to current local regulations.

We encourage our suppliers to improve waste segregation in their operations, reduce the levels of waste generated by reusing and recycling as much materials as possible. Please review the **Sustainability Policy** for additional information.

### Pollution prevention and resource efficiency

Suppliers must follow applicable local, national, and international pollution control laws, including the characterization, routine monitoring, controlling, and treatment of air or other pollutants as required by the law.

We encourage our suppliers to implement systems assessing the cumulative impacts of pollution sources at their facilities and implementing systems to

prevent pollution, including the discharge of microplastics into the waterways.

## Promotion of sustainable solutions

Fluidra is unwavering in its commitment to driving positive change in the marketplace, with a specific focus on promoting sustainable solutions especially those that actively reduce water consumption. Our commitment to responsible conduct extends beyond compliance to actively seeking opportunities that contribute to environmental and social well-being.

We advocate for and prioritize products and services that align with our sustainability goals, fostering a marketplace that values responsible practices. By encouraging innovation, collaboration, and conscious consumer choices, Fluidra aims to be a catalyst for sustainable solutions that make a lasting impact. We

expect our suppliers to follow these principles as well.

Suppliers are encouraged to follow the principles of circular economy, which emphasize the importance of reducing waste and maximizing resource efficiency. We expect our suppliers to actively support our efforts by adopting practices that prioritize reuse, recycling, and durability of products, as well as minimizing the use of virgin resources whenever allowed by product specifications.

Suppliers should possess a thorough understanding of the material composition of the products they provide, and be transparent about their environmental characteristics. Recyclable and sustainable packaging should be prioritized.



## 5. ENSURING COMPLIANCE WITH THE CODE

### 5.1. Code acceptance and implementation of measures by the supplier

Fluidra is committed to ethical business practices and expects its suppliers to agree and comply with the commitments outlined in this Code of Ethics for Suppliers. To this end:

- **All new agreements** signed with a supplier (regardless of their classification) must include an implicit (clause included in the purchase order) or explicit acceptance (contract clause or signature of the Supplier Declaration Form in Annex I) of the Code.
- In **current business relations**, Fluidra will ask **priority suppliers**<sup>2</sup> to accept and comply with the principles set out in this Code of Ethics following any of the methods described in the previous paragraph, in the event that they had not accepted it previously.

In the event of a supplier's refusal to accept Fluidra's Supplier Code of Ethics or to submit an equivalent document, Fluidra will apply the measures set in the **Supplier Qualification Procedure**.

Fluidra strongly encourages all its suppliers to define and implement a policy for social accountability and environmental responsibility and to adopt or establish a management system to ensure that the requirements of this Supplier Code of Conduct can be met consistently. The Code of Ethics for Suppliers is posted on Fluidra's website ([www.fluidra.com](http://www.fluidra.com)).

### 5.2. Training and awareness

Suppliers must ensure their employees and approved subcontractors working on Fluidra matters understand and comply with the contents of Fluidra's Code of Ethics for Suppliers, the applicable laws and regulations and generally recognized standards.

To ensure employee awareness and compliance, suppliers are recommended to administer annual

training to all employees and approved subcontractors working on Fluidra matters.

### 5.3. Assessments and Audits (Internal & External)

Fluidra may require verification of compliance with the Code at any time and the suppliers will have to authorize Fluidra and/or Fluidra-appointed third parties to monitor the appropriate enforcement of the Code. As such, suppliers shall provide the required means and the appropriate access to the facilities and documentation required to ensure this verification.

To ensure that our suppliers are aligned with sustainability objectives and commitments, Fluidra has a supplier evaluation and approval procedure based on international regulations and standards.

Fluidra, based on the criteria of the Procurement Policy, may ask any supplier to undergo the supplier evaluation and approval procedure, either through an online questionnaire and verification of the related documentation, or through an in-person audit, previously planned with the supplier. Both the questionnaire and the Audit may be carried out directly by Fluidra personnel or by a third party representing Fluidra.

In the event that, through the audit or verification of the questionnaire, non-conformities are detected, the supplier will have a temporary slot to resolve the non-conformity as established in the current internal supplier evaluation and approval procedure.

### 5.4. Exclusion as a Fluidra supplier

In the event that any actual adverse impact on people and/or the environment in which a supplier is involved, or any businesses linked to Fluidra in Sanctioned Territories is detected, Fluidra will require the supplier to take the appropriate measures to bring the adverse impact to an end or minimize the extent of such impact, in particular where no other measure is suitable or effective

<sup>2</sup> Understood as those suppliers classified as critical (product suppliers with a purchase volume of over €500,000 per year and whose main operations are conducted in countries considered of high or extreme risk in sustainability issues) or strategic (all other suppliers, of both products and services, with an annual purchase volume of over €500,000).

In case the supplier rejects to apply the required measures, the actual adverse impacts could not be ended, or the extent of which could not be minimized by the aforementioned measures, Fluidra will refrain from entering into new or extending existing

relations with a business partner in connection with or in the chain of activities of which the impact has arisen and, as a last resort, it will be excluded as a Fluidra supplier.

## 6. APPROVAL, REVIEW AND SUPERVISION

This Code of Ethics came into force for the first time on 12/16/2008 by approval of the Fluidra **Board of Directors**. Current version of the code was approved on 05/07/2024.

The Head of Procurement, as the person 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 Head of Procurement, as the person responsible for it, shall proceed to carry out the review, approval and extension processes to the subsidiaries, as applicable.

This process will be carried out in coordination with the areas responsible for managing each of the principles covered in this Code.

## 7. REVIEW HISTORY

Date	Description of the change	Author
September 2019	Approval of version 1.0	Head of Procurement
May 2024	Approval of version 2.0	Head of Procurement

## ANNEX I. SUPPLIER DECLARATION AND SELF-CERTIFICATION OF FLUIDRA'S CODE OF ETHICS FOR SUPPLIERS

Please read the Code of Ethics for Suppliers before completing this form.

**Supplier Company name:**

**Address:**

Fluidra is firmly committed to the principles of human rights, labor rights, the environment, and anti-corruption practices, as stated when it signed on to the United Nations Global Compact in August 2007. Accordingly, Fluidra's expectations of its suppliers are outlined in Fluidra's Code of Ethics for Suppliers. The COMPANY provides the SUPPLIER with the Code of Ethics for Fluidra Suppliers on its website at [www.fluidra.com](http://www.fluidra.com), where this code must be used as a guide for ideal ethical behavior.

By accepting this form, the authorized representative of the SUPPLIER company certifies that:

- The SUPPLIER has read and understood the contents of Fluidra's Code of Ethics for Suppliers and will take the necessary steps to flow down the principles outlined in Fluidra's Code of Ethics for Suppliers to its affiliates, subsidiaries and to their subcontractors involved in business with Fluidra.
- The SUPPLIER undertakes to comply with the Code of Ethics for Fluidra Suppliers and agrees that it shall form the basis of present and future business with Fluidra and its affiliates.
- The SUPPLIER accepts that this document shall be a commitment to the principles set out herein for all existing Contracts (if any), and for all business and contractual relationship with Fluidra.
- The SUPPLIER hereby gives its agreement and declares that neither it nor any of its subcontractors will violate any of the principles on human rights, labor rights, environment, and anti-corruption practices as stated by the United Nations and provided in the Fluidra document titled Code of Ethics for Suppliers.

Accept

Do Not Accept

Select the appropriate choice for your organization not being able to agree to Fluidra's Code of Ethics for Suppliers:

We have our own internal Code of Ethics that covers Fluidra's requirements, and we are providing a copy of our Code of Ethics with this form. We certify that our own Code of Ethics and current sustainability practices towards our supply chain are consistent with the principles set out in Fluidra's Code of Ethics for Suppliers.

We disagree with the contents of Fluidra's Code of Ethics for Suppliers, and we either do not have or will not provide an equivalent to Fluidra's Code of Ethics for Suppliers.

Please provide the contents you disagree with: \_\_\_\_\_

We disagree with Fluidra's approach to responsible ethical business practices, and we either do not have or will not provide an equivalent to Fluidra's Code of Ethics for Suppliers.

Please provide details against your disagreement: \_\_\_\_\_

The signatories hereby acknowledge that (a) they are authorized representative(s) of the Supplier, and (b) they are permitted to make these undertakings on behalf of the Supplier.

Signed by,

Signature: \_\_\_\_\_

Name and title of the representative: \_\_\_\_\_

Date: \_\_\_\_\_

**FLUIDRA**