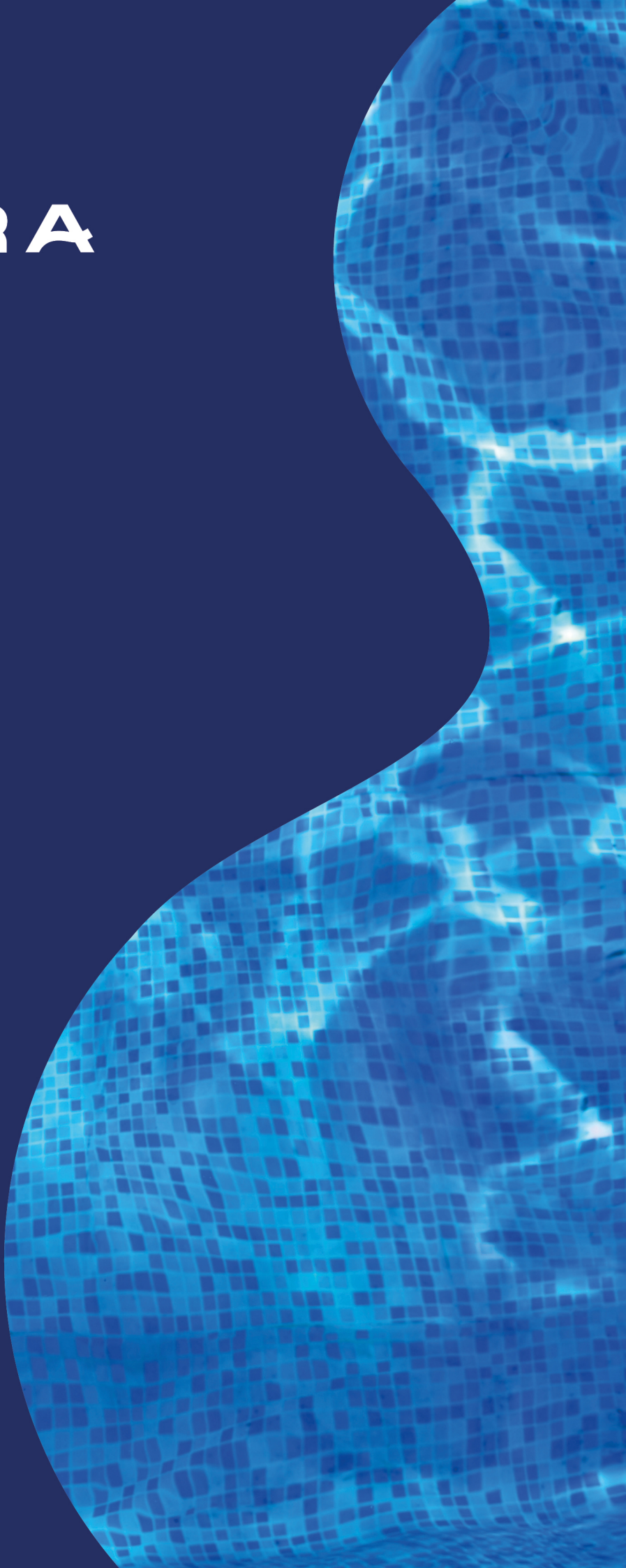


# FLUIDRA

## CODE OF ETHICS

Fluidra Group

May 2024



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

Since our very beginnings in 1969, Fluidra has operated with a clear premise and basic tenets that guide us in how we do business: In order to become world leaders in our sector, we must respect people and laws, be upright in our dealings, and be worthy of the trust of both our customers, suppliers and employees.

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.

Given the diversity of places we operate and the numerous laws and regulations we are subject to, adhering to these tenets is more important than ever. They serve as a North Star to be followed by all employees as they go about their daily business.

For this reason, in 2008, we defined our first Code of Ethics. This document draws from important international standards like the International Bill of Human Rights, the Declaration of the International Labor Organization (ILO), and the ten principles of the United Nations Global Compact.

The commitments outlined in the Code of Ethics are reflected in Fluidra's policies, directives and procedures, all of which demonstrates our commitment to compliance with the law and the principles that it upholds.

Since we first established Our Code of Ethics, they have been updated over time to keep pace with Fluidra's growth and the changing world around us.

Being part of Fluidra implies a commitment to respecting and upholding these principles every day. Should any questions, queries or complaints arise, our Confidential Channel is there for you. All disclosures are handled in the strictest confidence and the persons involved treated with utmost respect.

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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**Bruce Brooks**  
*Chief Executive Officer*

## 2. WHY THIS CODE? OUR SHARED RESPONSIBILITY

### 2.1. Scope of application

Fluidra's Code of Ethics (sometimes referred to as "Code") provides the **guidelines which must be followed by the Fluidra Group** (hereinafter, "Fluidra" or the "Company") **and its employees in the performance of their professional duties.**

The Code serves as a declaration of intent and is binding for all members of the board of directors, managers, and employees of all Fluidra companies, regardless of the documents that set out their professional or employment relationship (hereinafter the "Members"), thus ensuring ethical and responsible behavior.

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 Members and business partners, **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 manager, HR Representative, or use the Confidential Channel.

The Code of Ethics **neither substitutes nor cancels the applicable legislation of each country, or the international community**, in matters of administrative, civil, criminal, employment or commercial law, nor internal Company regulations or collective bargaining agreements that may apply.

This Code 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 Code 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. This Code should be read in conjunction with the commitments included in the **Supplier Code of Ethics** regarding our Supply Chain.





Fluidra Group Members and business partners have the responsibility:

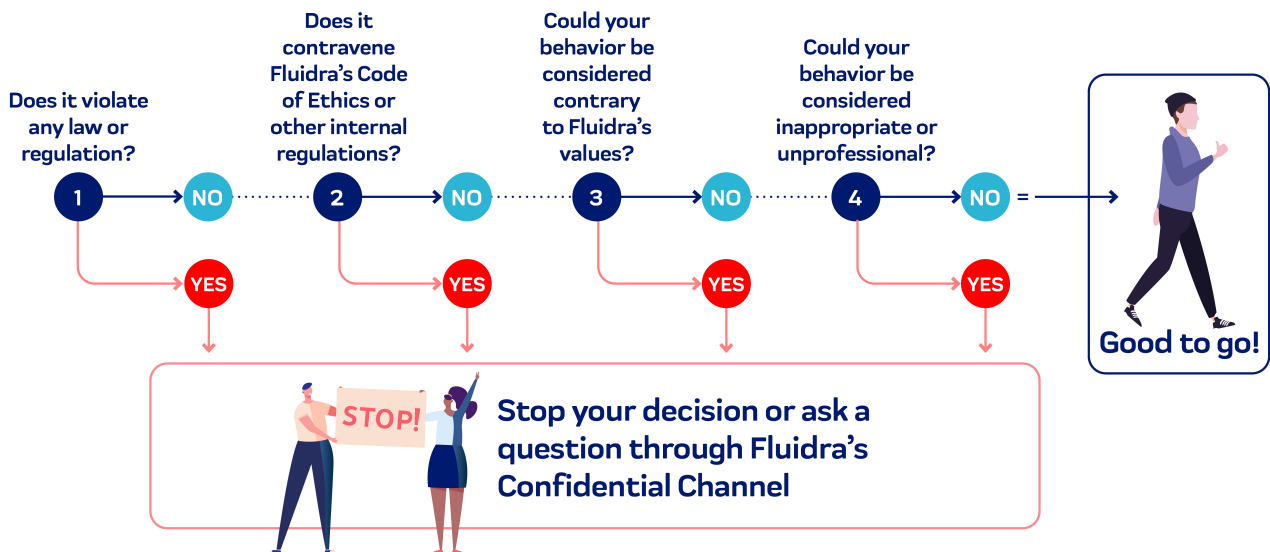
- **To know and apply** the standards of behavior set out in this Code, as well as the internal regulations which implement and complement them and to participate in regular mandatory training and awareness-raising initiatives in order to achieve excellence in professional conduct.
- **Not to tolerate** in the performance of your professional duties, any behavior that departs from the Code<sup>1</sup> or that may contravene the internal regulations that implement it, or the applicable law.

- **Inform 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 4 "Speak Up"](#).

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

Before making a decision, Fluidra Members and those with a business relationship with Fluidra should 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:**



<sup>1</sup> The application of the Code of Conduct should in no case be interpreted as a limitation of workers' rights. The obligations of the Code shall only be binding as long as they are compatible with employment legislation provisions.

## 3. OUR MISSION, VISION AND VALUES

Our mission is to create the perfect pool and wellness experience responsibly.

Our vision is to enhance lives through innovative and sustainable solutions that transform the way people enjoy water for recreation and health.

Fluidra aims to make gradual advances in its contribution to economic, environmental, and social progress within the context of sustainable development by strengthening and renewing its commitments with third parties and stakeholders in all operational areas.

To achieve this, we rely on compliance with our corporate values:



## 4. 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 as detailed below.

### 4.1. Essential principles of the Confidential Channel

#### Non-retaliation

Fluidra will not tolerate any form of threat or retaliation against any person who sends a report through the Confidential Channel as well as those who participate or help in its investigation, as long as they act in good faith.

#### Confidentiality

Any report sent through the Confidential Channel will be treated with the strictest confidence to the extent possible to engage in a full discrete investigation. This means that the information provided and the identity of the reporting person will only be disclosed to a limited number of people with proper authority, and it is expressly forbidden to disclose any type of information about the reports, unless otherwise required by law.

All parties involved in an internal investigation, including the reported person, are entitled to confidentiality to the greatest extent possible to avoid unnecessary damage to their reputation.

#### Anonymity

The reporting person has the option to use the Confidential Channel anonymously, if preferred, which may generate an extra layer of confidence to the reporter.

#### Rights of the accused and affected persons

The accused and the people affected by an internal investigation have the right to be informed of the complaint made, the right to honor, the right to the presumption of innocence and the right of defense.

#### Privacy

Fluidra is committed to protecting the privacy of everyone involved in an internal investigation to the greatest extent possible and safeguarding their personal data from unauthorized access and processing. Any personal data obtained in relation to the Confidential Channel will be processed according to the applicable legislation in Data Privacy.

#### Right to choose the communication channel

The complainant may choose the channel of communication that they consider most appropriate, being able to use Fluidra's Confidential Channel or external (competent authorities), without being required to use a specific channel.

## Right to limited information

The complainant, in the process of formulating the complaint, may not be asked for data that is not strictly necessary to process and, subsequently, Fluidra may not request or keep data that is not strictly necessary for the investigation.

## Right to receive a response within a reasonable time

The complainant will receive an initial acknowledgment of receipt of their complaint within a maximum period of seven days from receipt of the same by Fluidra. The term, in relation to data processing and research, may not exceed three months from the receipt of the communication, except in cases of special complexity that require an extension of the term, in which case, this may be

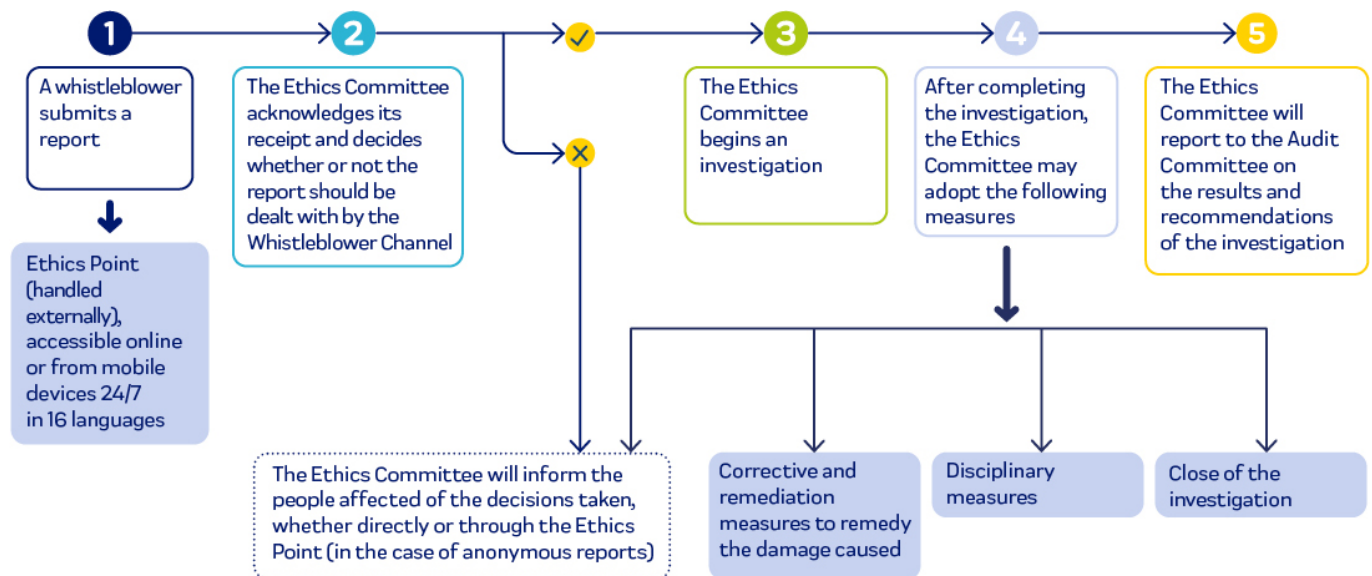
extended up to a maximum of three additional months.

## 4.2. Confidential Channel Management

Queries, concerns, and reports submitted through the Confidential Channel are received and handled in the strictest confidence as possible by the Ethics Committee, following the regulations defined in the **Speak Up Directive and Communications Management Procedure**.

The Ethics Committee is an internal collegial body reporting to the Board of Directors through the Audit Committee. It is made up of the Heads of the Legal, Internal Audit & Compliance, and Human Resources departments.

## Operation of the Confidential Channel





## 5. OUR COMMITMENTS

### 5.1. 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, 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 **ESG Policy**. Fluidra Members, 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 suppliers and customers to follow these principles.

#### Respect for people

Fluidra maintains 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. Everyone has the right to be respected and treated with dignity. All Fluidra Members are committed to maintaining good relations with all people, and to treating them with dignity, both within and outside of the Organization.

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.

#### Ensuring equal opportunities and non-discrimination

The Company is committed to providing a workplace free from harassment and unlawful discrimination. Fluidra provides all its employees with equal opportunities for secure employment and career advancement, ensuring that employment decisions are based only on relevant considerations, such as the individual's qualifications and abilities.

All Fluidra Members 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.

#### Promotion of diversity, equity, and inclusion

Fluidra embraces the value that comes from a broad perspective of skills, experiences, cultures, and backgrounds, and we strive to promote an organization that reflects the diversity of our customers and the communities we serve. As stated in our Diversity, Equity, and Inclusion Policy, we are committed to developing and promoting an inclusive culture where diversity is valued and celebrated and everyone is able to contribute fully and reach their full potential.

#### Abolition of all forms of modern slavery

Everyone has the right to carry out their work freely and voluntarily and 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.

As a part of the hiring process, Fluidra will provide workers with written information in a language they can understand. Workers shall maintain possession of their government-issued identification such as passports, work permits, or immigration documents. Fluidra Group companies 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 commits to employ workers who are at least 16 years of age, the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. Moreover, it will not use workers under the age of 18 to perform work that presents any unreasonable risk to their health and safety. Fluidra will implement an appropriate mechanism to verify the age of workers and will provide substantiation of this verification upon request.

These age restrictions do not apply when the work is performed as part of an educational or training course for which a school or training institution is primarily responsible; a training program that takes place wholly or mainly within a company and has been approved by the competent authority; or a guidance program aimed at helping people choose an occupation or type of training.

## Working hours and rest periods

Fluidra will 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. All overtime must be voluntary and should be approved by management. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

In addition, Fluidra is committed to promote work-life balance and digital disconnection measures among its employees, in those positions where it is susceptible to implementation.

## Wages and benefits

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 commits to pay a fair and equal wage, including benefits and leave, that meets basic needs of workers, and strives for a discretionary income in compliance with applicable laws and/or relevant collective agreements. Fluidra will also work to minimize and mitigate structural differences in pay and benefits between genders for equal or comparable work.

## Occupational Health & Safety

Fluidra prioritizes the fundamental rights to a safe workplace, implementing required occupational hazard protection systems. Our commitment involves strict adherence to health and safety regulations, encompassing prevention programs, training, and information on potential hazards.

Work on Fluidra's premises must align with safety measures per occupational hazard prevention regulations. Members are personally responsible for adopting prevention measures outlined by Fluidra, including strict prohibitions on substance use, alcohol consumption, and/or working in an impaired state during work hours. Members are expected to respect all health and safety measures, refraining from altering safety features. Fluidra has rigorous controls to monitor activities or products posing risks to public health. Detailed information is available in our Health, Safety, and Environment (HSE) Policy.

## Right to association and collective bargaining

Fluidra will 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.

Workers and/or their representatives shall 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 will 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. Measures are taken 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. The Fluidra Group demands the same standards from its suppliers.

## 5.2. Protecting company assets and reputation

### Appropriate use of Assets

Fluidra provides its Members with the devices, equipment, and IT systems (collectively referred to as "Assets") to perform their duties. Each Member is responsible for taking good care of these Assets and using them properly.

In addition, Fluidra's Assets must be used in accordance with the Company's Policies and regulations available on the corporate intranet. Fluidra takes necessary measures to prevent and control risks, such as:

- the unauthorized access to the IT systems or information;
- the spread of computer viruses or programs that may cause damage to tangible or intangible assets;
- the unauthorized installation of software,
- the unauthorized disclosure of information; and
- using Assets to perform illegal activities.

It is essential that Fluidra employees take special care of the Assets provided to them to perform their work.

### Anti-corruption and bribery

Fluidra bases its relationship with the public or private sectors on the principles of transparency and equal business opportunities. Accordingly, Fluidra rejects any unlawful dealings intended to obtain an unfair advantage over others in the market, or in

public or private bids. To this end, Fluidra has an **Anti-Corruption Policy** that expands on the principles of this Code of Ethics.

Together with the Compliance Policy, the Anti-Corruption Policy stems from Fluidra's Code of Ethics and constitutes a cornerstone for the Fluidra Group in the fight against corruption in the different areas in which it carries out its activities.

The Anti-Corruption Policy reinforces the Company's commitment to zero tolerance of any conduct that could be considered corruption, bribery, or fraud, as well as any other criminal act, or any conduct that goes against the principles set out in the Company's Code of Ethics. The Anti-Corruption Policy emphasizes the express prohibition of any form of corruption, including kickbacks, contract splitting, soft dollar practices, fraud, extortion, embezzlement and money laundering, among others.

### Money laundering prevention

All Fluidra Members must support international and local efforts to prevent and eradicate corruption and financial crimes, as well as any other offenses against third party rights.

Under no circumstances may gifts of cash be accepted by any Fluidra Member.

Neither Fluidra nor any of its employees may directly or indirectly carry out or be involved in activities related to money laundering. Fluidra shall comply 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.

Both the general and the specific guidelines for preventing money laundering and corruption are regulated in the **Anti-Corruption Policy** and in the internal regulation that develops it.

### Intellectual and industrial property rights

Fluidra bases its policy on the creation of intangible assets (brands, patents, industrial designs, domain names and other assets protected by industrial property rights) on its promotion of creativity and innovation, an on respect for its industrial and intellectual property rights and those of third parties.

Fluidra Members must respect its industrial and intellectual property, as well as its know-how and, in general, any work created or developed by Fluidra, whether as a result of its business practices or those of third parties.

Furthermore, in order to avoid any potential breaches of third-party rights, Fluidra has defined and implemented a number of internal procedures to which the development and launch of new products are subject that all of the companies in Fluidra must follow.

Without the required prior written consent of the holder of rights, or that of the person authorized to grant it under the terms defined, the intangible assets of third parties may not be copied or reproduced, either in full or in part, nor may such assets be imported or distributed.

Trademarks, patents, industrial designs, domain names and other intangible assets protected by industrial property rights will be subject to the same protection.

## Legal compliance

Fluidra recognizes the importance of the laws, rules, regulations, policies and standards to which it is subject, both internal and external.. Fluidra Members undertake to comply with all laws and regulations, including those that have a bearing on labor, environmental, and economic and financial matters, promote their enforcement, and abide by all final court or administrative rulings that may apply.

Fluidra Members will not conduct business in jurisdictions solely to take advantage of more lenient environmental, social, cultural, or labor-related laws.

## Political neutrality

Fluidra shall not make any contributions to political parties, candidates, or electoral coalitions. However, Fluidra cannot infringe on its employees' rights to engage in the political process in their personal capacity.

## Conflicts of interest, limitations and incompatibilities

All employees of the Fluidra Group have a duty to avoid conflicts of interest. A conflict of interest is a situation in which the private interest of one person

may interfere with the proper exercise of their professional judgement. It may also occur when a situation or circumstance may adversely influence the performance of the duties and responsibilities assigned to a person within the Fluidra Group.

When employees of the Fluidra Group become aware of a possible conflict of interest situation, they must refrain from participating in the decision-making related to the conflict and must inform Fluidra's Compliance Department of the possible conflict of interest.

## Corporate image and reputation

Fluidra considers its corporate image and reputation to be among its most valuable assets for maintaining the trust of its shareholders, customers, employees, suppliers, authorities and society in general.

While we all have the right to our own beliefs and values, we need to be sensitive to how our personal views may be perceived by others when we express them in the workplace or while representing Fluidra outside of the workplace.

Fluidra's communication and social media tools are managed by a specialized department and should not be used to advocate religious, political, or other potentially sensitive personal beliefs and views. All employees must be especially vigilant when speaking in public on behalf of Fluidra and must have the required authorization to participate in external engagements representing the Company, such as media engagements, social media posts, professional seminars, and external events.

## 5.3. Responsible conduct in the marketplace

### 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. Fluidra is also committed to sourcing minerals responsibly and minimizing negative impacts on the environment and human health caused by hazardous substances.



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The organization is also committed to apply high safety and quality standards, and to disclose and resolve instances in which risks are detected, consistent with local law.

## 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.

## Responsible marketing

Fluidra is committed to promote fair and responsible marketing practices, by communicating transparently about the economic, environmental, and social impacts of its brands, products, and services. The Company is committed to educating and informing its customers through truthful and accurate claims in its advertising, marketing and general communication materials. Fluidra pledges to respect its customers' freedom of choice and avoid publishing content that could mislead or limit their ability to make the best decision for their specific needs.

## 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.

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

Fluidra will ensure the protection of information and the confidentiality thereof, which will be the duty of all Members or those who collaborate with it. The unauthorized assignment of databases and confidential information is strictly prohibited.

The information shall be protected by security measures established according to the level of confidentiality.. Fluidra and its Members are responsible adopting the necessary security measures and following the procedures established to protect proprietary and confidential information stored on hard or soft copy from any external or internal threat, its unauthorized access, handling or destruction of such data, whether intentional or accidental.

Absent prior authorization, the duty of confidentiality with respect to information obtained in the course of work carried out for Fluidra survives termination of the working relationship, unless disclosures are required by law or in compliance with a legal or administrative ruling.

## Fair competition & antitrust

Fluidra conducts its business in the market based on the principles of fair competition and equal business opportunities, whereby it rejects any dealings intended to obtain an unfair or unlawful competitive edge or advantage over clients, suppliers, competitors and other stakeholders in the market.

All Fluidra Members shall not participate in unlawful agreements that may limit the freedom of the markets in which it operates. Therefore, it will be considered strictly forbidden to engage in the following:

- unauthorized access to or disclosure of confidential information of other parties;
- industrial espionage;
- unauthorized disclosure of trade secrets;

# FLUIDRA

- use of the Company's or third-party insider information for any kind of transaction or business deal;
- knowingly spreading false information about products, services and market conditions;
- price fixing schemes with respect to products or on the Company's listed share price;
- market sharing;
- no-poach agreements; and
- interference in public procurement procedures.

The above activities constitute anti-competitive practices and should therefore be avoided. Fluidra respects its competitors and will not tolerate any actions by itself or third parties that violate fair competition rules.

Finally, Fluidra performs economic analysis of its position in the market. Although gaining market share from less efficient competitors is a cornerstone to a competitive market, Fluidra prohibits illegal conduct which may prevent effective competition.

## Insider trading

Insider trading occurs when an insider buys or sells a publicly traded company's stock or other securities with material, non-public information about that company. Material, non-public information is defined as any non-public information that could substantially impact an investor's decision to buy or sell a security given that if the information was made public, the price of the stock or security could dramatically change. Material, non-public information can include information regarding financial performance, changes in dividends, mergers, divestments, acquisitions, product or service developments, customer orders, or changes in leadership. It is also prohibited for non-insiders to trade with material, non-public information inappropriately provided to the non-insider by an insider.

Fluidra Members who learn about inside information in the performance of their duties, are considered insiders. Inside information must be kept strictly confidential and may not be disclosed to any non-insider within or outside Fluidra, including family members. Insiders must not buy, sell or otherwise

trade in securities of Fluidra while having inside information, and must not provide trading recommendations to non-insiders.

Insider trading is strictly illegal in the European Union, United States, and in most other countries; the acting insider may be penalized by the competent authorities as provided for, amongst other, by Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse.

## Customs and international trade control regulations

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. Any lobbying on behalf of Fluidra, either directly or through third parties, must be done lawfully and in accordance with the rules set by the company. Employees 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. Companies must ensure that these kinds of memberships do not contradict Fluidra's values and commitments, particularly on climate change.

## 5.4. Committed to society

At the core of our corporate values, Fluidra is steadfast in its commitment to making a net positive contribution to the communities we touch, nurturing the well-being of both people and the environment.

## Support to local communities

Fluidra aims to make a net positive contribution to our communities, people, and environment. We actively cultivate relationships by seeking partnerships with local organizations, non-profits, and community groups, fostering collaborations that contribute to the broader social good.

Fluidra is committed to contributing to the economic development of the local communities and supporting their sustainable development. We also respect and uphold the rights of local minorities, championing fair and equitable treatment across all aspects of our endeavors. Additionally, Fluidra is resolute in promoting access to pools within local communities, recognizing the recreational and wellness benefits they bring.

As we navigate our business landscape, we remain committed to these principles of community engagement, and we expect our suppliers and customers to support us in fostering a positive and sustainable impact on society at large.

## Environmental protection

Fluidra is deeply committed to environmental preservation, respecting the delicate balance of

natural systems. All Fluidra Members are expected to embrace and adhere to criteria for environmental respect and sustainability, complying strictly with all regulations.

Throughout our operations, we prioritize environmental consciousness and the protection of biodiversity, promoting the rational consumption of resources and actively working to reduce our environmental footprint. We embrace clean technology whenever feasible, balancing production requirements, market availability, viability, and cost considerations. We are also committed to efficient resource use and proper treatment of emissions, effluent, and waste.

Furthermore, water is the *raison d'être* of Fluidra. It is the duty of all Fluidra Members to pledge to use water responsibly and sustainably and to promote the most efficient processes and technologies for water treatment.

At Fluidra, we not only uphold these principles internally but also actively participate in and support local environmental initiatives, contributing to overall community sustainability and health.





## 6. ENSURING COMPLIANCE WITH THE CODE

### 6.1. Deployment of the Code's commitments

The contents of this Code are and will continue to be developed through specific policies, directives and/or procedures in each area, which may have global, regional and/or local scope as necessary. It is the responsibility of the responsible departments to allocate the necessary resources and means to ensure compliance.

### 6.2. Training & awareness

At the beginning of their employment relationship with any Fluidra Group Company, all employees shall receive a copy of the Code of Ethics, which they must read and accept during the first 90 days after joining the Company. In the case of those employees who join Fluidra as a result of a merger or acquisition, such signing shall be carried out as soon as possible, in accordance with the provisions of the

integration plans. In addition, all employees will be asked to review and re-sign the Code in the event that its content undergoes significant changes.

Fluidra will also provide general training on the principles and commitments contained in the Code, either through MyCampus or in person, which will be supplemented by additional training on specific principles if necessary (compliance, cybersecurity, ESG, etc.). In addition, the Code will be translated into main local languages and available at all times on Fluidra's intranet and website.

### 6.3. Penalties for non-compliance

In the event that, after the pertinent investigations, a breach of any of the contents of this Code is demonstrated, the Ethics Committee will propose the corresponding actions and/or sanctions, in accordance with the seriousness of the case and the applicable regulations.

## 7. 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 ESG, 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 ESG, 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.



## 8. REVIEW HISTORY

<b>Date</b>	<b>Description of the change</b>	<b>Author</b>
December 2008	Approval of version 1.0	Head of Tax & Legal
September 2015	Approval of version 2.0	Head of Tax & Legal
September 2019	Approval of version 3.0	Head of Tax & Legal
May 2022	Approval of version 4.0	Head of Global HR & ESG
May 2024	Approval of version 5.0	Head of ESG

## ANNEX I. CODE OF ETHICS ACKNOWLEDGMENT FORM

Please read the Code of Ethics before completing this form<sup>2</sup>.

In \_\_\_\_\_, on \_\_\_\_\_

I, \_\_\_\_\_, employee of \_\_\_\_\_ a Fluidra Group company (hereinafter, "the Company"), acting on my own behalf, hereby acknowledge that:

1. I have received and reviewed a copy of Fluidra's Code of Ethics.
2. I fully understand the principles set forth in the Code of Ethics, and I acknowledge my commitment, as an employee of the Company, to comply with it.
3. When I have a concern about potential or actual illegal and/or unethical conduct or a potential or actual violation of the Code of Ethics, I will promptly report the concern to my immediate supervisor and/or the HR Manager at the facility where I work, or report it through the Confidential Channel.
4. To the best of my knowledge and belief, I have not engaged in any activity nor have any conflict of interest that violates the letter or spirit of the Code of Ethics.
5. As of the date of this Certification, I am in full compliance with all policies and procedures established by the Company and communicated to me including, but not limited to, those contained in the Code of Ethics.

Pursuant to the foregoing, I sign this document at the place and on the date indicated in the heading.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

<sup>2</sup> I understand that this Policy does not constitute an employment agreement, contract, or a guarantee to continue my employment. I further understand that the Company reserves the right to change the provisions of this Policy at any time and without prior notice. I understand that either the Company or I may terminate my employment at any time, with or without cause, and with or without notice.

**FLUIDRA**