



FLUIDRA

Fluidra Holdings Australia Pty Ltd (ACN 128 458 104)

**20
21**

**MODERN SLAVERY
STATEMENT**

MISSION

To create the perfect pool and wellness experience responsibly

VISION

To enhance lives through innovative and sustainable solutions that transform the way people enjoy water for recreation and health



CUSTOMER COLLABORATION

We add value for our users and customers



PASSION FOR SUCCESS

We are committed, accountable and consistent



EXCELLENCE & INNOVATION

We continuously improve and aim responsibly to be the best

OUR VALUES



HONESTY & TRUST

We are fair, transparent and accessible



LEARN & ADAPT

We are open minded, flexible and positive



TEAMWORK & INCLUSION

We are humble and consider all perspectives

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OVERVIEW

This, our second modern slavery statement outlines the potential risks of modern slavery within our business, the steps to be taken by us to address such risks and what we have done since our previous statement in helping achieve our goals. This statement is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* for the year ended 31 December 2021.

Fluidra Australia remains fully committed to preventing the use of human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour in our operations and within our supply chain.

OUR STRUCTURE

Fluidra Holdings Australia Pty Ltd (ACN 128 458 104) (Fluidra Australia) a parent company, incorporated in Australia with its registered office located in New South Wales and has the following wholly-owned subsidiaries:

Name of Entity	ACN	Country of Incorporation
Fluidra Australia Pty Ltd	112 387 265	Australia
Astral Pool Australia Pty Ltd	007 284 504	Australia
Price Chemicals Pty Ltd	603 386 849	Australia
Huricon Investments Pty Ltd	112 390 664	Australia
Huricon Staffing Pty Ltd	112 387 381	Australia
Fluidra Group Australia Pty Ltd	002 641 965	Australia
Fabtronics Australia Pty Ltd	106 940 738	Australia
Fluidra (N.Z) Limited	Company Number: 2348251	Australia

Over this reporting period, Fluidra Australia engaged and consulted with its subsidiary entities to inform and contribute to the development of this statement. For clarity the directors of Fluidra Australia are also directors of all the subsidiaries.

Fluidra Australia has vast experience developing, producing, distributing and marketing innovative products and services for the residential and commercial pool and wellness markets. Our portfolio includes some of the most recognized brands in the industry, such as Jandy®, AstralPool®, Polaris®, Cepex®, Zodiac®, CTX Professional® and Gre®.

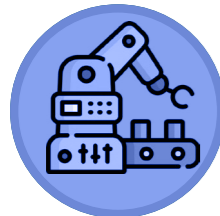
We form part of the global Fluidra Group, with its headquarters located in Sant Cugat de Vallés (Barcelona, Spain) and is the global leaders in the Pool and Wellness sector with broad geographical coverage and operations in 47 countries.



6 DISTRIBUTION CENTRES



410 EMPLOYEES IN AUSTRALIA & NZ



4 MANUFACTURING FACILITIES



9 PRO CENTRES

OUR OPERATIONS

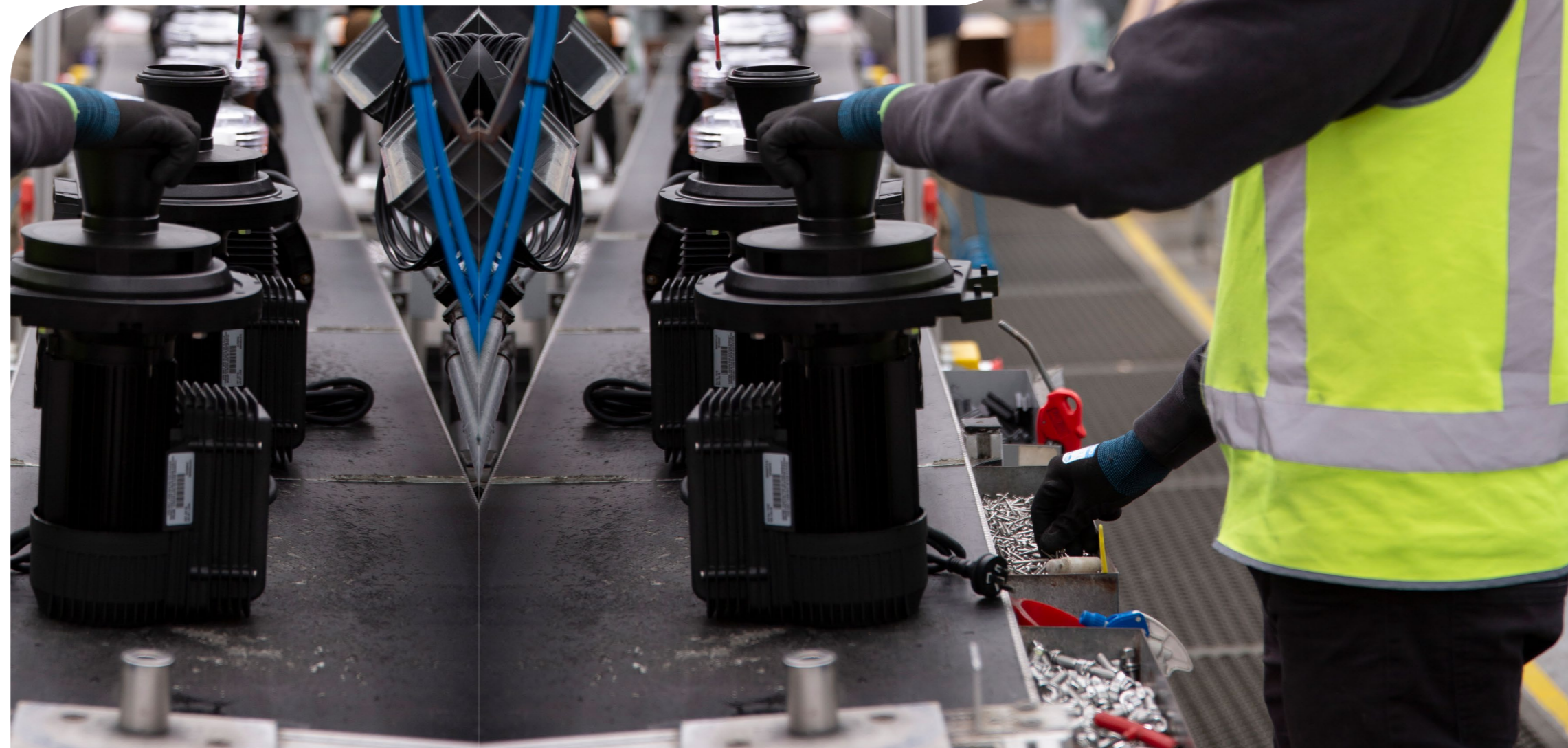
Within Australia and New Zealand, our operations include 9 Pro Centres, 6 distribution centres and 4 manufacturing facilities. We employ approximately 410 employees across a wide range of roles.

OUR SUPPLY CHAIN

Fluidra Australia maintains ongoing relationships with its suppliers in order to convey our commitment to responsible business conduct throughout the entire supply chain.

Our operations within Australia and New Zealand consist of the distribution of pool and spa equipment and chemicals. The majority of these products are manufactured locally at our facilities in Victoria and New South Wales, as well as procured from our global operations in China, Europe, South Africa, and North America. In addition, we also distribute products produced by third parties abroad in China, Malaysia, Taiwan, South Korea and elsewhere.

For products we manufacture within Australia, components are sourced from domestic based vendors (who in turn also procure locally and abroad).





MODERN SLAVERY RISKS

While Fluidra Australia does not directly cause or contribute to modern slavery practices, we do recognise that there is a potential for modern slavery risks to exist within international supply chains and that such risks increase especially with those beyond our direct suppliers.

IDENTIFYING MODERN SLAVERY RISKS

Since our first Modern Slavery Statement, Fluidra Australia has continued to focus on conducting a risk assessment of its supply chain.

Thus far we have sent out a self-assessment questionnaire on modern slavery to 66% of our Suppliers. Included in this number are our top 20 Suppliers which equates to 80% of our annual spend. The results we have received thus far have not outlined any major areas of concern.

We plan to roll out this assessment to the remaining 34% of our suppliers in the upcoming months.

These risk assessments will enable us to classify our suppliers into low, medium and high-risk categories.

MANAGING MODERN SLAVERY RISKS

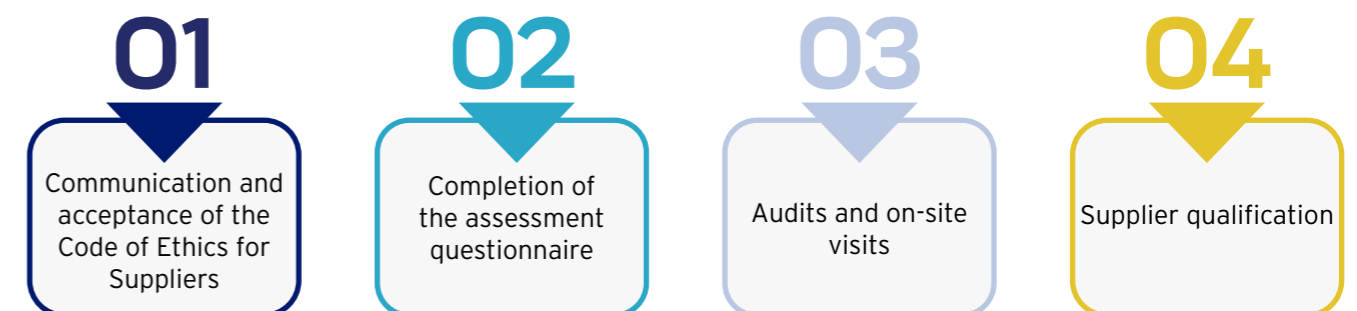
WORKING WITH SUPPLIERS

Should the assessment result in the materialisation of any modern slavery risks, a specific corrective action plan will be defined to mitigate and remediate such risks.

Further to the above, we are also developing a new procedure which will commence in FY22, to govern the approval process of suppliers (new &

existing) who produce or supply products that are considered complex, strategic or subject to strict legal and regulatory requirements, or who are considered risky by the Purchasing, ESG, Human Resources, Quality or Compliance departments.

The process will consist of the following phases:



AFFILIATION WITH INTERNATIONAL ASSOCIATIONS

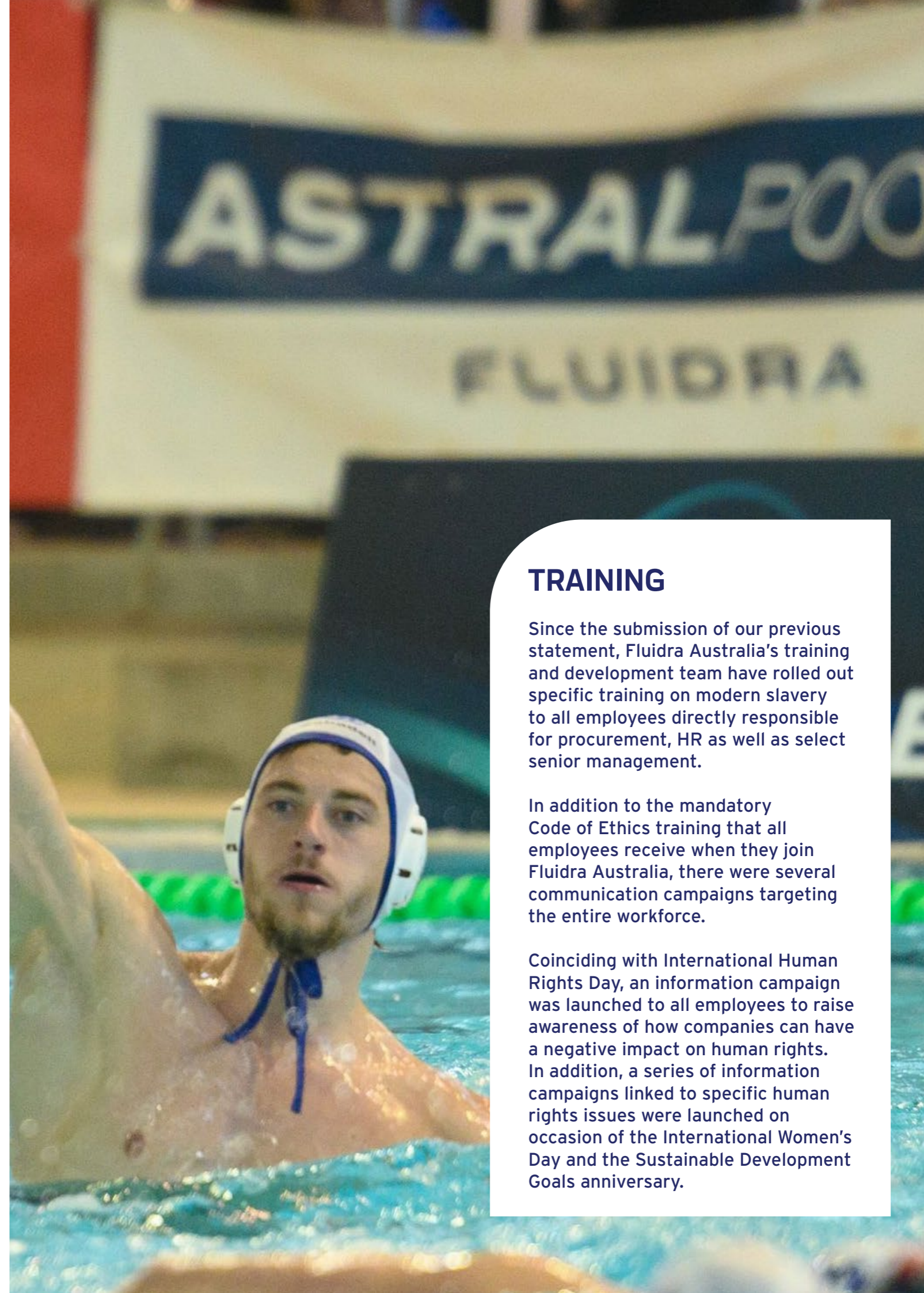
As an organization, Fluidra respects and accepts each and every point of the **Universal Declaration of Human Rights**, as well as the fundamental conventions of the **International Labour Organization** in relation to the freedom of association, the right to collective bargaining, child labour and forced labour.

In this regard, it should be noted that Fluidra Group is a signatory member of the **United Nations Global Compact**, committing itself to the 10 principles defined by the organization in the areas of Human Rights, Labour Rights, Environmental Protection and Anti-Corruption.

GOVERNANCE

We have the following policies and procedures in place to mitigate the risk of modern slavery.

POLICY/PROCEDURE	PURPOSE
Code of Ethics	Our Code reflects our commitment in promoting a fairer and more sharing society, while respecting applicable legislation and the rules for sustainable development and serves as a declaration of intent and is binding for all directors, managers, and employees of all Fluidra companies.
ESG Policy	This Policy sets out the actions that we adopt to prevent and mitigate any negative impact on Human Rights that may occur, either as a result of our activities, products, or services, or in its business relationships. All employees are obligated to understand and accept the rules of conduct on human rights.
Suppliers Code of Ethics	Provided to all our suppliers, this Code establishes a commitment between the us and our suppliers, with both parties promising to respect and uphold the principles of the Universal Declaration of Human Rights, Children's Rights, and the Declaration of the International Labour Organization, as well as compliance with current legislation.
Global Sanctions Policy	This Policy has been designed to prevent violations of Trade Sanctions Laws, avoid the appearance of wrongdoing, and enable Fluidra to respond promptly and effectively to any enquires about its conduct with respect to Trade Sanctions Laws.
Procurement Policy	This Policy establishes basic policies and procedures of the procurement of raw materials, components, services, fixed assets, and external manufactured goods and intends to ensure consistent purchasing practices including obligation for fiscal responsibility, proper documentation, and ethical behaviour.
General Compliance Policy	The core function of the Internal Audit and Compliance Department is to promote a preventive culture based on the principle of "zero tolerance" for any illegal act or breach of the principles of ethical and responsible behaviour, both within the company and in its relations with customers and suppliers or any other third party.
Whistle-blower Hotline	We encourage all employees and suppliers to use this confidential channel to relay any concerns they may have about their own actions or those of third parties which could be in violation of the ethical principles of any Fluidra company.



TRAINING

Since the submission of our previous statement, Fluidra Australia's training and development team have rolled out specific training on modern slavery to all employees directly responsible for procurement, HR as well as select senior management.

In addition to the mandatory Code of Ethics training that all employees receive when they join Fluidra Australia, there were several communication campaigns targeting the entire workforce.

Coinciding with International Human Rights Day, an information campaign was launched to all employees to raise awareness of how companies can have a negative impact on human rights. In addition, a series of information campaigns linked to specific human rights issues were launched on occasion of the International Women's Day and the Sustainable Development Goals anniversary.

METHODS TO ASSESS THE EFFECTIVENESS OF OUR ACTIONS

Fluidra Australia remains strongly opposed to modern slavery and is committed to continuously improving its approach to ensure no situation of this type occurs either in our activities or with the suppliers we work with. As such, we will continue to focus on the following initiatives:

- i. Run regular training exercises on modern slavery risks and human rights for any new and existing employees directly responsible for procurement, human resources as well as senior management.
- ii. Complete the internal risk matrix assessment of our supply chain and conduct an internal audit of our suppliers screening process.
- iii. Update our supplier agreements to incorporate a modern slavery clause.
- iv. Continue to obtain Modern Slavery Declarations and signed Supplier Code of Ethics from our suppliers to establish a baseline of supplier's performance.
- v. Formalise a process of regularly auditing of suppliers against our modern slavery policies.
- vi. Implement a procedure to govern approval process of suppliers.

This statement has been approved by the board of directors of Fluidra Holdings Australia Pty Ltd.



Stephen Matysiak
Director
30 June 2022

