

**MODERN
SLAVERY
STATEMENT**

20
23

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


PASSION FOR SUCCESS
We are committed, accountable and consistent


CUSTOMER COLLABORATION
We add value for our users and customers


EXCELLENCE & INNOVATION
We continuously improve and aim to be the best


HONESTY & TRUST
We are honest, transparent and accessible

OUR VALUES


LEARN & ADAPT
We are open minded, flexible and positive


TEAMWORK 1+1>2
We are humble and inclusive

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OVERVIEW

This is our fourth modern slavery statement for Fluidra Holdings Australia Pty Ltd (ACN 128 458 104) (**Fluidra Australia**).

It outlines the potential risks of modern slavery within our business, the steps we have taken to address these risks, our progress since our previous statement, and our goals for the upcoming year. This statement is made in accordance with the *Australian Modern Slavery Act 2018* (Cth) for the year ended 31 December 2023.

At Fluidra Australia, we remain fully committed to preventing human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour in our operations and throughout our supply chain.



OUR STRUCTURE

Fluidra Australia is incorporated in Australia with its registered office in New South Wales serving as a parent company and has the following wholly owned subsidiaries:

Names of Subsidiary Entities	ACN	Country of Incorporation
Fluidra Australia Pty Ltd	112 387 265	Australia
AstralPool Australia Pty Ltd	007 284 504	Australia
Hurlcon Staffing Pty Ltd	112 387 381	Australia
Fluidra Group Australia Pty Ltd	002 641 965	Australia
Fabtronics Australia Pty Ltd	106 940 738	Australia
SRS Australia Pty Ltd	166 055 634	Australia
Sunbather Pty Ltd	004 898 631	Australia
Fluidra (N.Z) Limited	Company Number: 2348251	New Zealand

During the reporting period, Fluidra Australia engaged and consulted with its subsidiary entities to inform and contribute to the development of this statement. The directors of Fluidra Australia also serve as directors of the subsidiary entities.

Fluidra Australia is part of the global Fluidra Group, headquartered in Sant Cugat del Vallès, Barcelona, Spain. As world leaders in the pool and wellness market, we operate in 47 countries.

We specialize in designing, producing, and distributing swimming pool equipment and chemicals for both residential and commercial markets. Our portfolio features some of the most recognized brands in the industry, such as Jandy®, AstralPool®, Polaris®, Cepex®, Zodiac®, CTX Professional® Gre®, SR Smith® and Barracuda®.

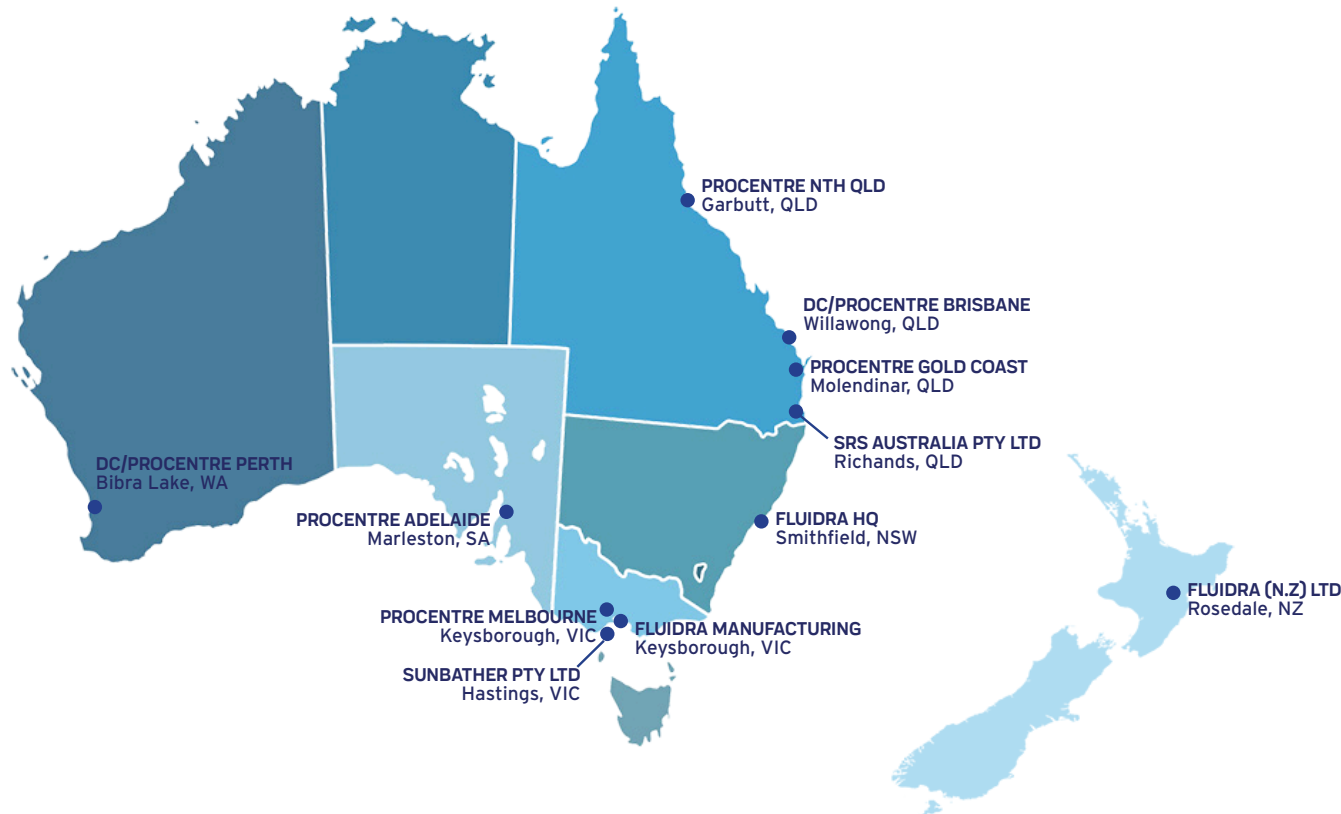


OUR OPERATIONS & SUPPLY CHAIN

At Fluidra Australia, we maintain ongoing relationships with all our suppliers to uphold our commitment to responsible business conduct.

Our operations in Australia and New Zealand involve the distribution of pool and spa equipment and chemicals. Most of these products are manufactured locally at our facility in Victoria, as well as sourced from our global operations in China, Europe, South Africa, and North America. Additionally, we distribute products produced by third parties in China, Malaysia, Taiwan, South Korea, and other locations.

For products manufactured within Australia, we source components from both domestic and international vendors, who, in turn, procure materials locally and abroad.



OUR OPERATIONS

WE OPERATE

1
Manufacturing Facilities



AND

6
Distribution Centres



WE HAVE

3
Pro Centres



AND

3
Pro Counters



WE HAVE

395
Employees in Australia
and New Zealand



MODERN SLAVERY RISKS

While we do not directly cause or contribute to modern slavery practices, we recognize that the complexity of our supply chain presents potential risks, particularly with suppliers beyond our direct partners. We are committed to preventing, addressing, and remedying any such risks should they arise.

IDENTIFYING MODERN SLAVERY RISKS

We continue to undertake an evaluation process to better understand and assess any risks to our supply chain.

- Continuing our previous efforts, we are actively encouraging our suppliers to complete our modern slavery self-assessment questionnaires. In 2023, we distributed these questionnaires to suppliers acquired through our 2022 acquisitions of Sunbather Pty Ltd and SRS Australia Pty Ltd.

Additionally, we have now incorporated the suppliers of these two subsidiaries into our risk matrix. This matrix evaluates suppliers based on the geographical locations of their facilities, categorizing them into low, medium, and high-risk levels regarding modern slavery practices. High-risk countries identified include China, Hong Kong, Taiwan, and Thailand.

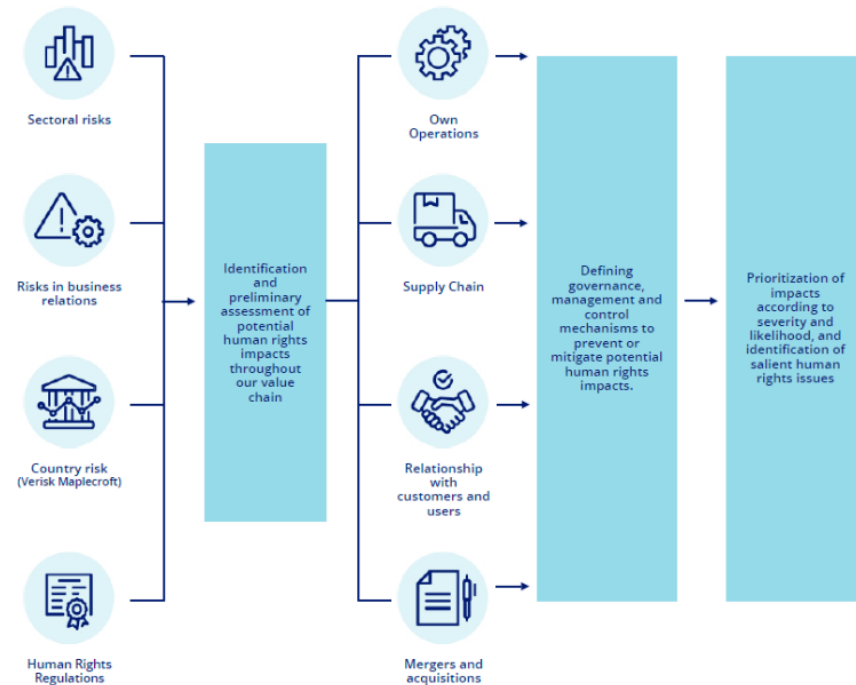
Furthermore, our global parent company conducts detailed audits of our critical suppliers, covering many aspects of modern slavery risks. We assess our suppliers on a three-year cycle, meaning those audited in 2021 will be re-audited in 2024.

Of the responses received to date, we have completed questionnaires from our top 20 suppliers, representing 80% of our annual spend.

- We are continuously liaising with our global ESG department as they conduct an initial assessment of 28 potential human rights impacts across the group's activities, products, services, and business relationships. This includes issues like forced labour, modern slavery, and child labour, especially in conflict areas and high-risk scenarios, with a focus on protecting vulnerable groups such as women, children, minorities, migrant workers, and indigenous peoples.

The goal is to ensure a management and control framework for all identified impacts, aligned with international human rights standards. In 2023, 5 new impacts were evaluated, bringing the total to 15 out of 28. Once the assessment is complete, priority will be given to the most severe and likely impacts (salient human rights issues) and detailed action plans create for them. Refer to process diagram below.

Process of identifying, assessing and prioritising potential human rights impacts:





- Our Code of Ethics and Code of Ethics for Suppliers is currently under revision and is expected to be approved in early 2024. The ESG Department is also working on procedures with measures to prevent forced labour and child labour throughout our value chain.
 - Due to the potentially hazardous nature of the activities, we perform (specially manufacturing and warehouse work), Fluidra prohibit the hiring of people under 16 years old, regardless of whether local legislation in the country establishes a lower limit. At year-end 2023, we had no employees under 18 years old in our workforce.
 - In collaboration with the Merger and Acquisition department, a due diligence process has been established since 2022 for operations involving the integration and acquisition of new companies. The objective is to assess potential impacts based on the type of activity and geographical location of the target company's facilities. This includes reviewing documentation related to managing potential human rights impacts aligned with the existing risk level.
- Future procedures for preventing forced labour and child labour will incorporate a requirement to notify the governing body responsible for approving the operation if a high level of risk is identified in these areas. It will also recommend halting the process if deemed necessary. In the event that the acquisition proceeds, an external audit will be conducted and a corrective action plan will be created with a timeframe to be executed within the first hundred days after the acquisition agreement are advised. Fluidra Australia did not engage in any M&A transaction in 2023.
- No breaches of modern slavery were detected in our supply chain in 2023 or the previous years. Additionally, there have been no reports of child labour, forced labour violations, or infringements related to freedom of association or collective bargaining rights.

MANAGING MODERN SLAVERY RISKS

WORKING WITH SUPPLIERS

The following initiatives have been ongoing to manage modern slavery risks in 2023:

- The Procurement Department is responsible for assessing potential human rights impacts within our supply chain, which is integrated into the supplier selection, approval, and evaluation systems and processes. Building on our efforts from the previous year, we have continued to educate our key suppliers on human rights commitments outlined in the Code of Ethics for Suppliers and Fluidra’s due diligence mechanisms.

Our Code of Ethics for Suppliers uphold the principles of the Universal Declaration of Human Rights, Children’s Rights, and the International Labour Organization’s Declaration, as well as adhere to current legislation. Suppliers must accept and follow these principles unless they have an equivalent code. In cases of non-compliance with the Code, Fluidra reserves the right to implement corrective measures or, as a last resort, suspend the contractual relationship.

Suppliers can report any suspected breaches of the Code of Ethics for Suppliers through Fluidra’s Confidential channel or by directly contacting Fluidra’s local sourcing teams. No breaches were detected in 2023 or the year before, nor were any complaints or warnings received in this regard.

- As in the case of the sourcing policy, the Procedure is currently under review. It is anticipated that the updated version will be released in 2024. This new procedure applies to all suppliers both new and existing identified as potentially critical and categorised as high-risk, by the Sourcing, ESG, Human Resources, Quality or Compliance departments.

In these cases, the approval process consists of the following phases:

1	2	3	4
Communication and acceptance of the Code of Ethics for Suppliers.	Completion of the assessment questionnaire.	Audits and on-site visits.	Supplier qualification.

In order to ensure that our sustainability commitments are effectively taken onboard in supply chain management, we have segmented our suppliers differently in 2023, based on risk criteria by country in respect of human rights and other critical aspects of sustainability. On the basis of these criteria, four levels of suppliers were set that are defined as follows:

Critical suppliers	Strategic suppliers	Standard Suppliers	Basic Suppliers
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.	All other suppliers (of both products and services) with an annual purchase volume of over €500,000.	Suppliers with an annual purchase volume of between €500,000 and €50,000.	Suppliers with a purchase volume of under €50,000 and suppliers with higher expenses, but of an instrumental nature, such as banks, public bodies, bank cards and customs.

As part of the above, Fluidra has partnered with Achillies (a company that specializes in supply chain assessment and monitoring) to conduct audits of Suppliers to Fluidra Australia located in high-risk countries.

MANAGING MODERN SLAVERY RISKS

Since the program's inception in 2022, we have audited a total of 9 suppliers to Fluidra Australia, with 5 audits conducted in 2023 and another 8 scheduled for 2024. Our commitment is to audit all our critical suppliers on a three-year cycle. No modern slavery risks were identified for Fluidra Australia in 2023.

- Since last year, the Confidential Channel has been available in 16 languages and has been managed by an external provider, replacing the previous email address, in order to allow whistleblowers to file their reports anonymously to reinforce the confidentiality and security of the channel itself. This is intended to bolster the protection of whistleblowers and make them feel more confident so that more people will come forward. There were no submissions in 2023 related to Fluidra Australia.

TRAINING

Since last year, we have continued offering modern slavery training to all employees directly responsible for procurement, HR, and selected senior managers. In 2023, we dedicated 19.5 hours to modern slavery training. Additionally, in 2023, we conducted 12 information campaigns on Human Rights issues for all employees throughout the year. Our goal is to increase this to 24 campaigns in 2024. This is part of our Human Rights training plan, which includes the following training modules:

- **Introductory Training:** A brief overview of what human rights are and how they are managed at Fluidra, available to the entire workforce. Launched in September, this training is also part of the onboarding plan for all new employees.
- **Advanced Training:** Offered by the ESG Department for key departments, this training covers the most relevant regulations in this area and Fluidra's human rights management framework.
- **Focused Training Sessions:** These sessions, provided by the ESG

Department or the relevant departments, address specific human rights impacts, such as child labour and forced labour.

AFFILIATION WITH INTERNATIONAL ASSOCIATIONS

As an organisation, 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 Organisation 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 organisation 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	Purpose	Policy	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.	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.
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.	General Compliance Policy	In line with our commitment to best corporate governance practices and the ongoing improvement of our compliance management systems, we have set rules and policies which are promoted by the office of the director of the Group's Internal Audit and Compliance Department. The core function is to promote a preventative 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 its relations with customers and suppliers or any third parties.
Suppliers Code of Ethics	Provided to all our suppliers, this Code establishes a commitment between 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.	Whistle-blower hotline	We have implemented a Whistleblower Management Procedure where we encourage employees and suppliers to make reports via the confidential channel where they suspect any breaches of the Code of Ethics from employees and suppliers. If there are any breaches Fluidra intends to investigate each report fairly, speedily and with full confidentiality with both parties.
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 enquiries about its conduct with respect to Trade Sanctions Laws.	Supplier Qualification Procedure	The purpose of this Supplier Qualification Procedure is to define a methodology that allows the qualification of a supplier (existing or new) in order to provide products and / or services to any company of Fluidra.

METHODS TO ASSESS THE EFFECTIVENESS OF OUR ACTIONS

Fluidra Australia remains firmly opposed to modern slavery and is committed to continually improving our approach to prevent such situations in our operations and among our suppliers. Our focus will remain on the following actions:

- i. Continue mandatory training for new employees and regular training on modern slavery risks and human rights for all employees directly responsible for procurement, human resources, and senior management.
- ii. Continue obtaining Modern Slavery self-assessment questionnaires and signed Supplier Codes of Ethics from our suppliers.
- iii. Update our supplier agreements to include modern slavery clauses.
- iv. Continue conducting audits on suppliers in high-risk countries and implementing action plans.
- v. Conduct a risk assessment of local suppliers, particularly those providing services.

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



Valentina Tripp
Director



28 June 2024



