

MODERN SLAVERY STATEMENT

20
25

Fluidra Holdings Australia Pty Ltd
(ACN 128 458 104)

FLUIDRA

Modern Slavery Statement 2025

Fluidra Holdings Australia Pty Ltd (ACN 128 458 104)

Fluidra’s core purpose is *"to turn water into a better world."* This is achieved through three main strategic pillars:

- **Responsible Pool Experiences:** Creating and maintaining the perfect pool and wellness experiences using eco-friendly, chemical-free, and resource-efficient technologies.
- **Sustainability & Society:** Protecting the environment and conserving water by optimizing the consumption of water, energy, and chemicals.
- **Community Impact:** Providing broader access to safe water and swimming therapeutic benefits through the Fluidra Foundation.

Fluidra’s Values



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OVERVIEW

This is the sixth Modern Slavery Statement for Fluidra Holdings Australia Pty Ltd (ACN 128 458 104) (**'Fluidra Australia'**).

This statement details the potential risks of modern slavery across our operations and supply chain, actions taken to manage these risks, progress made since our 2024 statement, and our objectives for the year ahead.

This statement is submitted in accordance with the **Modern Slavery Act 2018** (Cth) for the annual reporting period ending 31 December 2025.

At Fluidra Australia, we remain firmly committed to eliminating all forms of modern slavery including human trafficking, domestic servitude, forced marriage, forced labour, debt bondage, deceptive recruitment practices, and child labour within our business operations and supply chain.



OUR CORPORATE STRUCTURE

Fluidra Australia is an Australian incorporated company with its registered office in New South Wales. It operates as the parent company and has the following wholly owned subsidiaries:

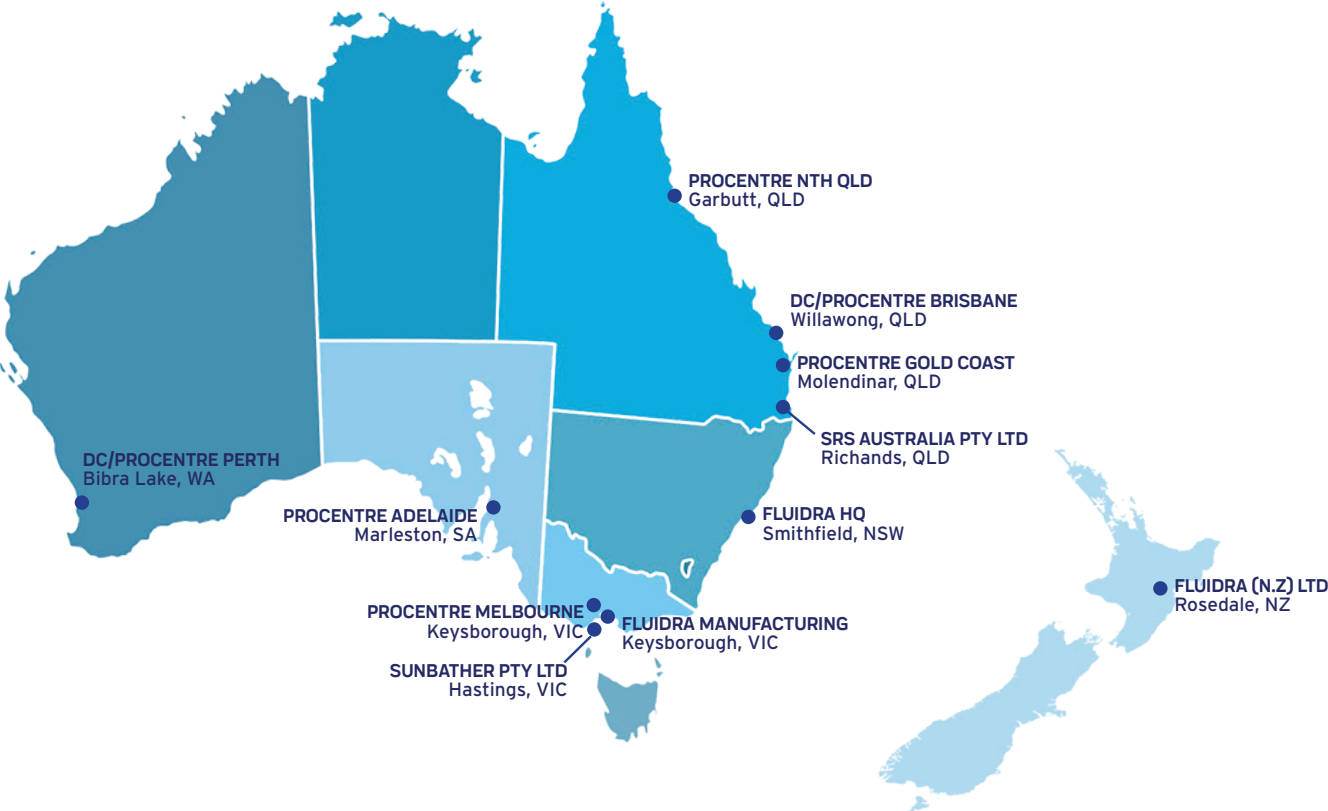
Names of Subsidiary Entities	ACN or Company Number	Country of Incorporation
Fluidra Group Australia Pty Ltd	002 641 965	Australia
Sunbather Pty Ltd	004 898 631	Australia
SRS Australia Pty Ltd	166 055 634	Australia
Pooltrackr Pty Ltd	613 848 221	Australia
Fluidra (N.Z) Limited	2348251	New Zealand

During the reporting period, Fluidra Australia engaged and consulted with its subsidiary entities to help inform the preparation of this statement. The directors of Fluidra Australia also act as directors of these subsidiaries.

Fluidra Australia forms part of the global Fluidra Group ('Fluidra'), which is headquartered in Sant Cugat del Vallès, Barcelona, Spain. As a global leader in the pool and wellness industry, Fluidra operates across 47 countries. The company specialises in the design, manufacture, and distribution of swimming pool equipment and chemicals for the residential and commercial markets. Our brand portfolio includes many of the industry's most recognised names:



OUR OPERATIONS & SUPPLY CHAIN (as of 31 December 2025)



At Fluidra Australia, we maintain an ongoing engagement process with our suppliers to support our commitment to responsible and ethical business practices.

Our operations in Australia and New Zealand focus on distributing pool and spa equipment and chemicals. The majority of our products are manufactured locally at our facilities in Victoria and Western Australia, while others are sourced from our global supply chain in Europe, South Africa, and North America. We also distribute products made by third-party manufacturers from countries such as China, Malaysia, Taiwan, South Korea, and Vietnam.

For products manufactured in Australia, we source components from both local and international suppliers, who themselves obtain raw materials from a mix of domestic and overseas sources.

OUR OPERATIONS

WE OPERATE

3

Manufacturing Facilities

AND

7

Distribution Centres

WE HAVE

5

Pro Centres

AND

2

Pro Counters

WE HAVE

383

Employees in Australia and New Zealand

MODERN SLAVERY RISKS

Fluidra Australia's supply chain covers the sourcing of raw materials, components, semi-finished and finished products, along with a broad range of business services. We acknowledge that potential risks may exist within our broader supply chain, particularly beyond our direct suppliers. We are committed to proactively identifying, addressing, and remediating any instances of modern slavery if such a risk arises.

IDENTIFYING MODERN SLAVERY RISKS

Continuing with previous years efforts, we remain committed to engaging with our suppliers with our modern slavery due diligence processes. We actively encourage all suppliers to complete our modern slavery self-assessment questionnaire.

Our modern slavery survey has been shared with of our new and existing suppliers representing approximately 80% of our total procurement spend in 2025. We had received 74 completed replies to the questionnaire representing a 70% response rate. This information will be used to direct our ongoing monitoring, training and supplier engagement plans for 2026.

As part of our ongoing global compliance requirements, we also require all strategic suppliers to acknowledge our Code of Ethics for Suppliers. This Code sets out the mutual commitment between Fluidra and its suppliers to uphold the principles of the Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, as well as compliance with applicable laws and regulations.

Commitment to Human Rights

Fluidra fully upholds the principles set out in the United Nation's Universal Declaration of Human Rights, as well as the covenants of the International Bill of Human Rights relating to civil, political, economic, social and cultural rights. In line with this commitment, Fluidra Group is a signatory to the United Nations Global Compact ('UNGC') and supports its Ten Principles covering human rights, labour and environmental protections, and anti-corruption policies.

The UNGC commitment is reflected in the Fluidra's ESG Policy, Code of Ethics, and Code of Ethics for Suppliers, which sets out clear expectations for all stakeholders. In addition, Fluidra has established a human rights management framework based on the United Nations Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

Human Rights Management Framework



MODERN SLAVERY RISKS

Human Rights Due Diligence

Since 2021, Fluidra Global has implemented a structured approach to identifying and assessing potential human rights impacts across its operations and value chain. This process involves interviews, questionnaires, and expert analysis, with particular focus on high-risk regions and vulnerable groups such as women, children, migrant workers, and Indigenous peoples. These audits cover health and safety, child and forced labour, migrant workers, working hours, compensation and benefits, labour practices, worker representation, discrimination and disciplinary practices.

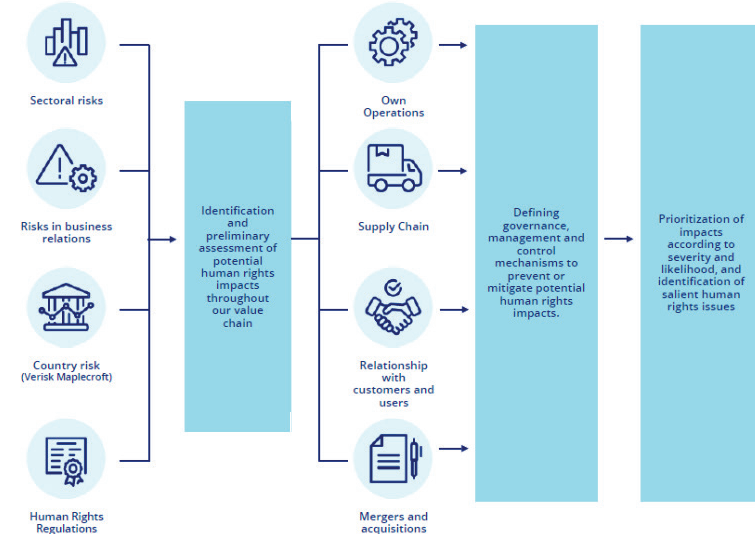
Audits and Impact Management

Fluidra continues to perform detailed audits of its critical suppliers on a three-year revolving cycle, as part of its broader due diligence framework. To improve the accuracy of risk identification, a third-party provider (Achilles Global Risk Management, an independent consulting group that specializes in supply chain assessment and monitoring) conducted 5 on-site critical supplier audits in 2025. Where non-conformities are identified, specific mitigation plans are implemented. In parallel, the company assesses human rights risks within the supply chain as part of the ongoing supplier approval and ongoing performance evaluation process.

The objective is to ensure that all identified risks, regardless of their severity or likelihood of occurrence, are managed within a framework aligned with international human rights standards. Following the completion of this assessment, we prioritise the most severe and likely impacts (also known as key human rights issues) and focus our efforts on addressing them. See the process diagram opposite.

Fluidra maintains a confidential, externally managed grievance channel that is available in 16 languages. This allows for the anonymous reporting of breaches to the codes of ethics, policies, or laws. Governance is provided by Fluidra's Ethics Committee, ensuring that complaints are handled transparently and that remediation processes are in place when human rights impacts are identified.

Process for Identifying, Assessing, and Prioritizing Human Rights Impacts



Fluidra is firmly committed to eliminating all forms of forced and child labour across its operations and supply chain. We uphold the principle that all work must be freely chosen and performed without coercion, and we strictly prohibit practices such as debt bondage, involuntary prison labour, forced marriage, and human trafficking.

As part of our ethical hiring practices, employees are provided with clear, written information in a language they understand, they retain their personal identification documents and are not subjected to unreasonable restrictions on their freedom of movement. We do not charge recruitment fees and ensure employees may freely resign, subject to applicable contractual terms.

With respect to child labour, Fluidra enforces a strict zero-tolerance policy. We only employ individuals who meet the legal minimum working age. As of the end of 2025, there were no employees under 18 years old within our workforce.

No instances of modern slavery were detected in Fluidra Australia in 2025 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 maintained to manage modern slavery risks in 2025:

- Fluidra Groups's supply chain team is responsible for evaluating potential human rights risks within our supply chain. This assessment is integrated into the processes for supplier selection, approval, and ongoing evaluation. Building on last year's progress, we have continued to raise awareness among key suppliers regarding the human rights standards outlined in Fluidra's Code of Ethics for Suppliers and related due diligence processes.

The Code of Ethics for Suppliers is grounded in the principles of the Universal Declaration of Human Rights, the Rights of the Child, the International Labour Organization's Declaration, and all applicable laws and regulations. In cases of non-compliance, Fluidra will take corrective action, including the suspension of contractual relationships where necessary.

Suppliers are encouraged to report any suspected violations of the Code through Fluidra's confidential reporting channel or by contacting their local sourcing teams. No breaches, complaints, or alerts were recorded in 2025 or the previous years or reporting.

- Fluidra has established procedures to monitor procurement activities and manage incidents across its value chain. The sourcing team will utilise a program to track progress, using a process outlined in the Global Procurement Policy that strengthens the sustainable supply chain management process

Fluidra does not communicate directly with supply chain workers or their representatives. Instead, we work in partnership with the commercial

contacts of our direct suppliers. These contacts take part in training sessions, sign the Code of Ethics of Suppliers, fill out survey forms, and help coordinate external audits. We currently monitor feedback from workers in our supply chain through interviews done by Achilles during external audits. These interviews include questions about human rights and working conditions.

Workers can raise concerns in two main ways. First, through the interviews during our third-party audits where any serious issues identified are flagged in the audit report and followed up with an action plan. Second, is where concerns can be raised through our confidential reporting channel, which is explained during annual training sessions for supplier representatives. These representatives are expected to actively share this information with their workers. If a concern is reported, Fluidra's Ethics Committee and the global supply chain team investigate and take steps to mitigate and manage the issue.

- In 2022, Fluidra implemented a Supplier Qualification Procedure. This outlines how we assess whether direct suppliers meet our minimum standards in areas such as environmental, social, and corporate governance, regulatory compliance, and financial stability.

This procedure applies to both new and existing suppliers who may be considered critical such as those supplying complex or strategic products, operating in high-risk environments, or subject to strict legal and regulatory requirements. It also applies to suppliers identified as higher risk by our supply chain, ESG, HR, Quality, or Compliance teams.

Suppliers are grouped into four categories based on their risk level, which determines the level of review and approval required. All direct suppliers must complete this qualification process, whether they are new

MANAGING MODERN SLAVERY RISKS

or existing partners. The process is designed to ensure that we work only with suppliers who meet Fluidra’s standards and that we can continually monitor and manage potential risks throughout our supply chain relationships.

Priority suppliers		Rest of suppliers	
Critical suppliers	Strategic suppliers	Standard suppliers	Basic suppliers
Product suppliers with a purchase volume of over 500,000 euros 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 euros.	Suppliers with an annual purchase volume of between 500,000 euros y 50,000 euros.	Suppliers with a purchase volume of below 50,000 euros and suppliers with higher expenses, but of an instrumental nature, such as banks, public bodies, bank cards and customs.

Since the program began in 2022, we have audited with Achilles a total of 20 critical suppliers to Fluidra Australia, including five audits completed in 2025. The 20 suppliers represent 38% of our ongoing purchasing spend. We are committed to auditing 100% of all critical suppliers on a three-year review cycle. No modern slavery non-conformities were identified for Fluidra Australia in 2025. In this context, no new critical suppliers have been identified for an Achilles audit in 2026. All critical suppliers currently in scope have already been audited in previous years within the current cycle.

Total Number of Achilles Audits since 2022

Australia & New Zealand	
Audits completed in 2022	4
Audits completed in 2023	5
Audits completed in 2024	6
Audits completed in 2025	5
Current audit plan for 2026	0
TOTAL AUDITS COMPLETED	20

INTERNAL TRAINING

Fluidra Australia continues to provide modern slavery training to all employees directly involved in procurement and HR, as well as senior management. In 2025, we delivered 13 hours of training to management employee directly involved in procurement, HR and senior management. In 2026, we have scheduled a minimum of 62 hours of modern slavery awareness training for all existing staff (plus any new joiners) throughout the year with the intention to extend this awareness training to our key suppliers. In addition, we will run specific training for the supply chain, HR and senior management teams.



GOVERNANCE

Globally, Fluidra has the following policies, procedures and reporting in place to mitigate the risk of modern slavery:

Policies & Procedures	Purpose	Policies & Procedures	Purpose
Code of Ethics for Suppliers (May 2024)	This code is shared with all our suppliers and sets out a mutual commitment to uphold the principles of the Universal Declaration of Human Rights, the Rights of the Child, and the core conventions of the International Labour Organization, along with compliance with all applicable laws and regulations.	Environmental, Social, and Governance Policy (Feb 2024)	This policy outlines the measures we take to prevent and address potential negative impacts on human rights that may arise from our operations, products, services, or business relationships. All employees are required to understand and adhere to the established human rights conduct guidelines.
Code of Ethics (May 2024)	This code demonstrates our commitment to fostering a fairer, more inclusive society, while upholding applicable laws and sustainable development principles. It serves as both a statement of intent and a binding obligation for all directors, managers, and employees across all Fluidra companies.	Global Sanctions Directive (Sept 2025)	This directive is designed to ensure compliance with trade sanctions laws, prevent any violations or perceptions of wrongdoing, and enable Fluidra to respond quickly and effectively to any inquiries regarding its adherence to these laws.
Global Procurement Policy (Feb 2026)	This policy aims to ensure the efficient and ethical procurement of raw materials, components, IT and other services, office supplies, fixed assets and externally manufactured goods at Fluidra, prioritizing quality, cost-effectiveness, sustainability, and compliance with legal and company standards. Fluidra shall further develop and implement the necessary procedures to complement and support the effective application of this policy.	Whistle-blower Hotline https://www.fluidra.com/about-fluidra/confidential-channel-and-ethics/	The whistleblower hotline encourages employees and suppliers to report suspected violations of the Code of Ethics through a secure and confidential channel. Fluidra is committed to investigating all reports promptly, impartially, and with strict confidentiality for all parties involved.
Supplier Qualification Procedure (May 2022)	This procedure outlines a structured approach for evaluating and qualifying both new and existing suppliers to ensure they meet the standards required to provide products and/or services to any Fluidra company.	Integrated Annual Report 2025	This comprehensive report provides a strong foundation for Fluidra Australia's Modern Slavery Statement as contains substantial disclosures on governance, human rights, supplier oversight, workforce protections, ESG due diligence, and value chain management. Much of the content aligns directly with the reporting expectations under modern slavery legislation in Australia, the EU, and other jurisdictions.

METHODS TO ASSESS THE EFFECTIVENESS OF OUR ACTIONS

Fluidra Australia remains firmly committed to opposing all forms of modern slavery and continuously improving our practices to prevent its occurrence within our operations and supply chain. Our ongoing efforts focus on the following actions:

1. **Regular Training:** continue mandatory induction training for new employees, along with refresher training sessions on modern slavery risks and human rights for staff involved in procurement, human resources, and senior management.
2. **Supplier Engagement:** maintain the collection of Modern Slavery self-assessment questionnaires and acknowledged Codes of Ethics for Suppliers from our suppliers.
3. **Contractual Safeguards:** updating supplier agreements to include specific clauses addressing modern slavery.
4. **Auditing:** persist in conducting audits of suppliers operating in high-risk regions and implementing corrective action plans where necessary.

This statement has been formally approved by the Board of Directors of Fluidra Holdings Australia Pty Ltd.



Clinton Alley
Director

30 June 2026



