



**FLUIDRA**

Fluidra Holdings Australia Pty Ltd  
(ACN 128 458 104)

20

22

**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 is our third modern slavery statement for Fluidra Holdings Australia Pty Ltd (ACN 128 458 104) (Fluidra Australia), which outlines the potential risks of modern slavery within our business, the steps taken by us to address such risks, what we have done since our previous statement in helping achieve our goals and what we aim to work on in the upcoming year.

This statement is made in accordance with the *Australian Modern Slavery Act 2018 (Cth)* for the year ended 31 December 2022.

At Fluidra Australia, we continue to stay 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 through to our supply chain.

## OUR STRUCTURE

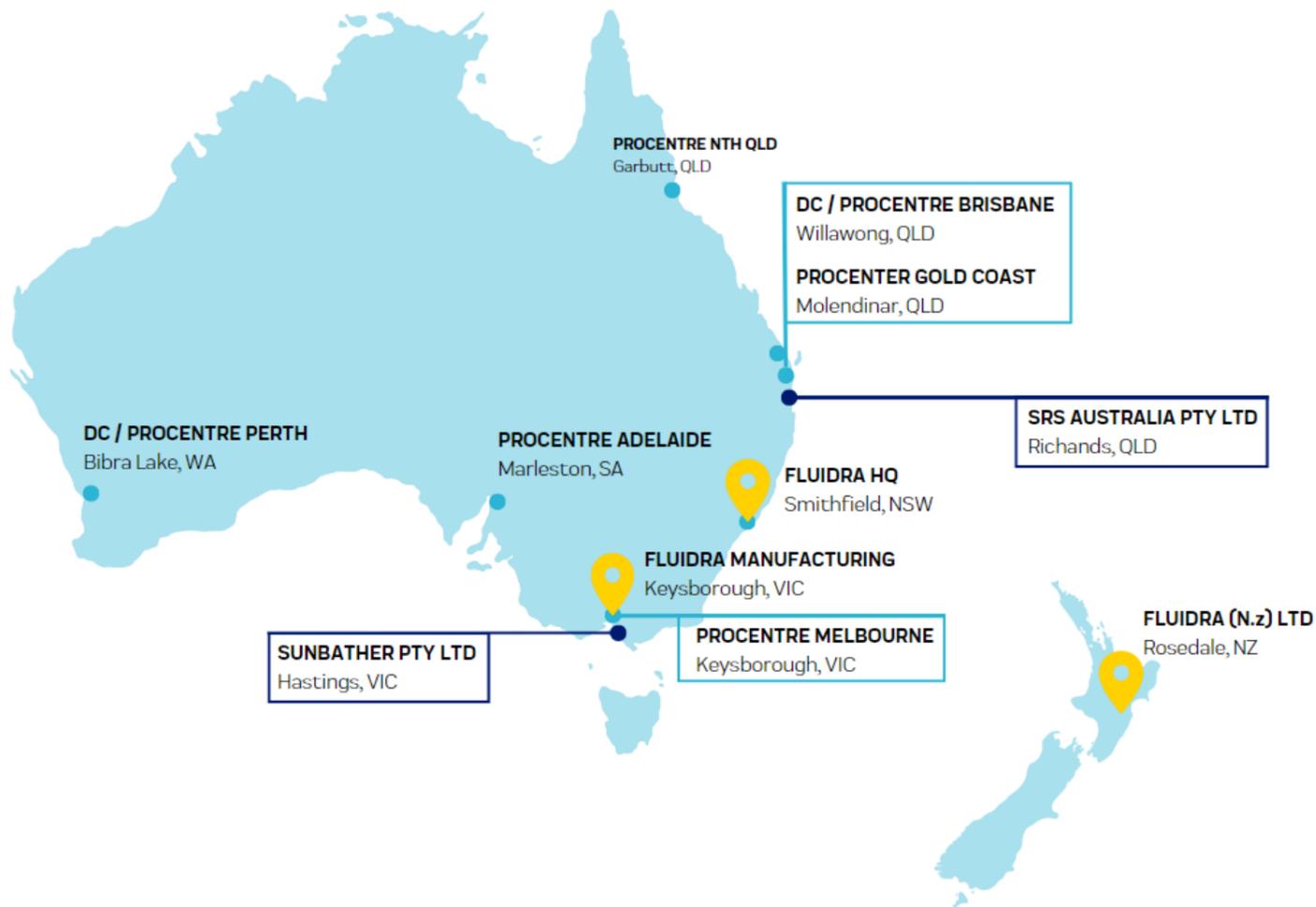
Fluidra Australia is a parent company, incorporated in Australia with its registered office located in New South Wales and has the following wholly owned subsidiaries:

Name of Entity	ACN	Country of Incorporation
Fluidra Australia Pty Ltd	112 387 265	Australia
Astral Pool Australia Pty Ltd	007 284 504	Australia
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 has engaged and consulted with its subsidiary entities to inform and contribute to the development of this statement. The directors of Fluidra Australia are also directors in the subsidiary entities.

We form part of the global Fluidra Group, with its headquarters located in Sant Cugat De Valles, Barcelona, Spain. We are world leaders in the pool and wellness market, operating across 47 countries.

We specialize in the design, production and distribution of swimming pool equipment and chemicals 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®.



## OUR OPERATIONS & SUPPLY CHAIN

At Fluidra Australia we continue to maintain ongoing relationships with all our suppliers to ensure our commitment to responsible business conduct throughout our 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 as well as procured from our global operations in China, Europe, South Africa and North America. In addition, we 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 and overseas vendors (who in turn also procure locally and abroad).



8 DISTRIBUTION CENTRES



451 EMPLOYEES IN AUSTRALIA & NZ



2 MANUFACTURING FACILITIES



4 PRO CENTRES



## MODERN SLAVERY RISKS

While we do not directly cause or contribute to modern slavery practices, we do recognize and are aware that due to the complexity of our supply chain that there is potential for modern slavery risks to exist especially with those beyond our direct suppliers. We remain committed to preventing, addressing, and remedying such risks in the event of an impact.

### IDENTIFYING MODERN SLAVERY RISKS

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

In 2022, we continued the process we began in 2021 with sending out our self-assessment questionnaire on modern slavery to the remainder of our national and international Suppliers. Of the total 361 Suppliers, we have received 116 completed responses. The responses received include responses from our top 20 Suppliers which equates to 80% of our annual spend.

Fluidra Australia acquired two subsidiaries (SRS Australia Pty Ltd and Sunbather Pty Ltd) in 2022. We are currently in the process of incorporating these two entities into our risk assessment for modern slavery.

Further to the above, we completed a risk matrix in which we classified our Suppliers by their geographical location of facilities into risk levels; low, medium, and high in terms of modern slavery practices. The high-risk ranking countries were identified to be China, Hong Kong, Taiwan and Thailand.

There were no breaches detected in 2022, or the year before of modern slavery in our supply chain nor has there been any reports of child labour or forced labour violations or in relation to the 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 2022:

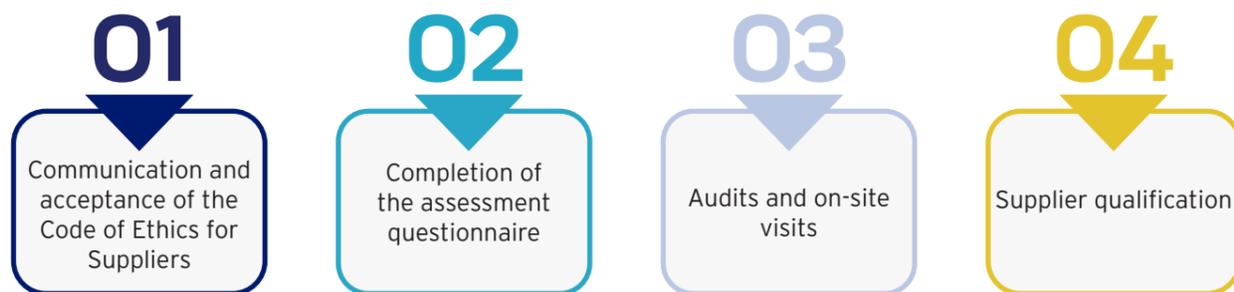
- We believe that closeness and communication are two constant values. We see these two aspects as fundamental for developing solid, long-lasting relationships that are rooted in transparency and honesty, helping us to create value and mutual benefit throughout our entire supply chain.

As such, Fluidra Australia continues to work with our Suppliers to obtain their completed self-assessments questionnaires from those that are still outstanding. Should an assessment result in the materialisation of any modern slavery risks, a specific corrective action plan will be defined to mitigate and remediate such risks.

- One of the cornerstones and guidelines for transmitting our values and principles throughout the supply chain is our Code of Ethics for Suppliers. We continue to provide all our suppliers with our Code of Ethics which is a commitment between us and our suppliers. Both parties promise to 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. Suppliers must accept and follow the principles laid out unless they have a similar code. In the event of non-compliance with the provisions of the Code, Fluidra reserves the right to put forward a series of corrective measures or, as a last resort, suspend the contractual relationship.



- In 2022, we implemented a Supplier Qualification Procedure with the purpose of defining a minimum criteria (environmental, social, corporate governance, regulatory compliance, information security and financial) that suppliers must meet before working on a long-term basis with any of the companies in the Fluidra Group. This new procedure applies to all suppliers (new and existing) with the potential to be considered critical, who are considered risky by the Sourcing, ESG, Human Resources, Quality or Compliance departments. In these cases, the approval process will consist of the following phases:



As part of the above progress, in 2022 Fluidra has partnered with Achillies (a company that specializes in supply chain assessment and monitoring) to conduct 4 audits of Suppliers to Fluidra Australia located in high-risk countries.

- Our confidential channel is a way in which our Suppliers may ask questions, request advice or report irregularities in relation to laws applicable to Fluidra, as well as the principles and values contained in our Code of Ethics for Supplier's. In 2022, we adapted the way in which our confidential channel was set up in order to reinforce the protection and trust of people who submit reports. As a result, since October the confidential channel has been managed by an external service provider to replace the email address that was previously available, so that people who submit reports can now do so anonymously.
- In partnership with the Merger and Acquisitions department, in 2022 a due diligence process was defined prior to operations involving the integration and acquisition of new companies. The goal was to analyse the potential impacts associated with the type of activity and geographical location of the facilities of the company to be acquired and see the necessary documentation on managing the potential human rights impacts in line with the existing level of risk.



## TRAINING

In 2022, we provided 60 hours of dedicated modern slavery training to all employees directly responsible for procurement, HR as well as select senior managers and shall be provided for any new employee with exposure to modern slavery practices.

All of our employees have participated in our Code of Ethics training that includes the principles of the Universal Declaration of Human Rights. We have also made this training mandatory for all new employees as part of their onboarding training plan.

We also run a number of annual information campaigns linked to Human Rights issues to all employees throughout the year.

## 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/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. The Code 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.

POLICY/PROCEDURE	PURPOSE
General Compliance Policy	In line with our commitment to best incorporate 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.
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.
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 continues to be strongly opposed to modern slavery and is committed to constantly improving its approach to ensure no situation of this type occurs either in our activities or with the suppliers that we work with. We will continue to focus on the following:

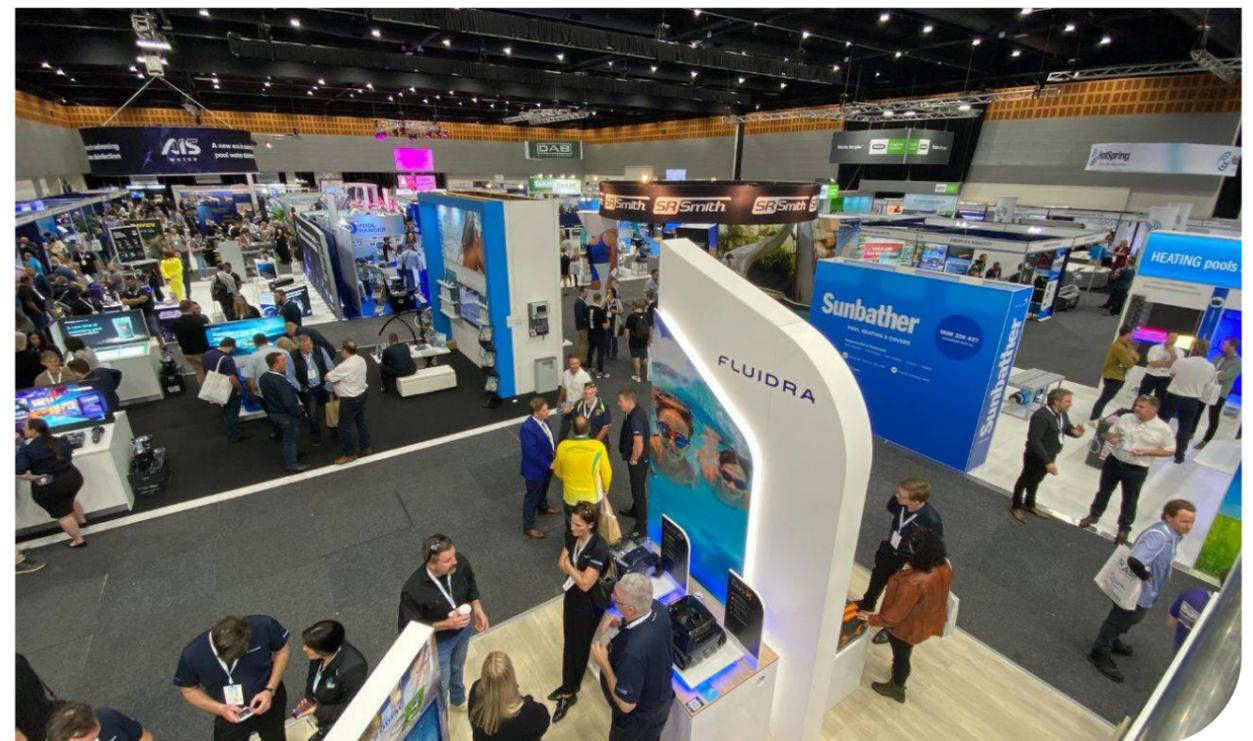
- i. Continue compulsory training for onboarding employees and regular training exercises on modern slavery risks and human rights for any new and existing employees directly responsible for procurement, human resources as well as senior management;
- ii. Continue to obtain Modern Slavery Declarations and signed Supplier Code of Ethics from our suppliers;
- iii. Update our Supplier Agreements to incorporate modern slavery clauses;
- iv. Complete the internal risk matrix assessment for the two new subsidiaries; and
- v. Conduct audits on Suppliers in high-risk countries and implement of action plans.

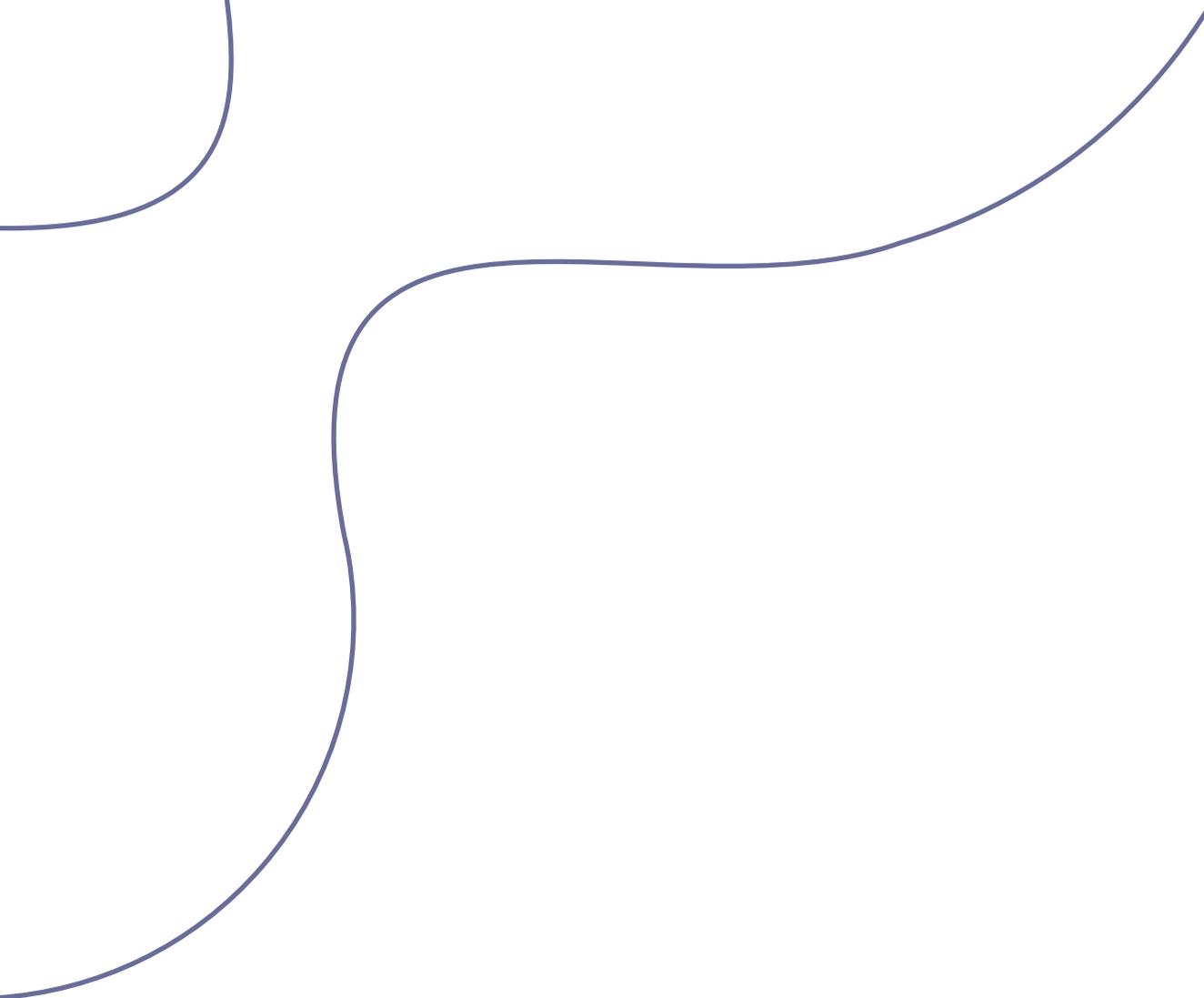
This statement has been approved by the board of directors of Fluidra Holdings Australia Pty Ltd.



**Stephen Matysiak**  
Director

30 June 2023





**FLUIDRA**