

A dark blue circular logo with a white border, containing the company name and details. The background of the entire page is a teal, bubbly liquid texture with white wavy lines.

FLUIDRA

Holdings Australia Pty Ltd

ACN 128 458 104

Modern Slavery Statement 2020

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Introduction

Introduction

This, our first modern slavery statement for Fluidra Holdings Australia Pty Ltd (ACN 128 458 104) (**Fluidra Australia**), outlines the potential risks of modern slavery within our business and the steps to be taken by us to address such risks.

This statement is made in accordance with the Australian *Modern Slavery Act 2018 (Cth)* for the year ended 31 December 2020.

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Fluidra Australia is 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 with the suppliers we work with locally and abroad.



Our Business Structure

Fluidra Australia is a company incorporated in Australia with our registered office located in New South Wales. We offer a wide range of products for the residential and commercial pool and wellness markets.

We form part of the global Fluidra Group, with its headquarters located in Sant Cugat del Vallés (Barcelona, Spain) and is the global leader in the Pool and Wellness sector.



Fluidra Australia owns and controls the following entities:

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
Hurlcon Investments Pty Ltd	112 390 664	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
Fluidra (N.Z) Limited	Company number: 2348251	New Zealand

Our Portfolio includes some of the most recognised brands in the industry.





Operations & Supply Chain

Our operations

Within Australia and New Zealand, our operations include:

9
Pro Centres

6
Distribution Centres

4
Manufacturing Facilities



approximately
410 employees
across a wide range of roles.

Our 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

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Fluidra Australia does not directly cause or contribute to modern slavery practices, however, we will be undertaking an evaluation process to better understand and assess any risks to our supply chain.

In our next reporting period, we aim to provide more details on the risks identified. We recognize the requirement to implement remediation plans and assess the effectiveness of our actions to address modern slavery.

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Managing Risk

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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.



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Policy or 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 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 Sanction Laws, avoid the appearance of wrongdoing, and enable Fluidra to respond promptly and effectively to any enquiries about its conduct with respect to Trade Sanction 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.
Whistleblower 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.

Introduction

Fluidra Australia is 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.



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In the next two years we will focus on the following initiatives:

- Run regular training exercises on modern risks and human rights for employees directly responsible for procurement as well as senior management.
- Complete an internal risk matrix assessment of our supply chain and conduct an internal audit of our suppliers screening process
- Update our supplier agreements to incorporate a modern slavery clause.
- Obtain Modern Slavery Declarations and signed Supplier Code of Ethics from our suppliers to establish a baseline of supplier's performance.
- Formalise a process of regularly auditing of suppliers against our modern slavery policies.

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

A handwritten signature in white ink, appearing to read 'Stephen Matysiak', is written over a dark blue background.

Stephen Matysiak
Director
30 June 2021

