# FLUIDRA

Holdings Australia Pty Ltd ACN 128 458 104

# Modern Slavery Statement 2020

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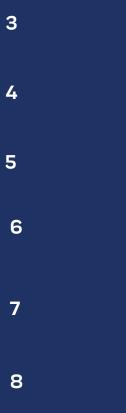
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This, our first modern slavery statement for Fluidra Holdings Australia Pty Ltd (ACN 128 458 104) (Fluidra Australia), outlines the potential risks of modern slavery within our business and the steps to be taken by us to address such risks. This statement is made in accordance with the Australian *Modern Slavery Act* 2018 (*Cth*) for the year ended 31 December 2020.

## Fluidra Australia is fully commited 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.



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## 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 it's headquarters locates in Sant Cugat del Vallés (Barcelona, Spain) and is the global leaders 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.



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## Operations & Supply Chain

#### **Our operations**

Pro Centres

Within Australia and New Zealand, our operations include:

## 6 Distribution Centres

approximately 410 employees across a wide range of roles.

### **Our Supply Chain**

Manufacturing Facilities

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).

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## Modern Slavery Risks

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

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.



#### Modern Governance Slavery Statement 2020 Policy or procedure Purpose Introduction 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 Our Business and is binding for all directors, managers and employees of all Fluidra companies. Structure **ESG** Policy This Policy sets out the actions that we adopt to prevent and mitigate any negative impact on Human Operations & Rights that may occur, either as a result of our activities, products or services, or in its business Supply Chain relationships. All employees are obligated to understand and accept the rules of conduct on human rights. Provided to all our suppliers, this Code establishes a commitment between us and our suppliers, Suppliers Code of Ethics Modern with both parties promising to respect and uphold the principles of the Universal Declaration of Slavery Human Rights, Children's Rights, and the Declaration of the International Labour Organization, as Risks 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 Managing wrongdoing, and enable Fluidra to respond promptly and effectively to any enguiries about its conduct Risk with respect to Trade Sanction Laws. Governance 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. Our Wav Forward

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.



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## **Our Way Forward**

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.



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.

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

Stephen Matysiak Director 30 June 2021