

MODERN SLAVERY STATEMENT

20
24

Fluidra Holdings Australia Pty Ltd
(ACN 128 458 104)

FLUIDRA

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



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OVERVIEW

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

It details the potential risks of modern slavery across our operations and supply chain, the actions we have taken to mitigate these risks, the progress made since our last statement, and our objectives for the year ahead.

This statement is submitted in accordance with the *Modern Slavery Act 2018* (Cth) for the reporting period ending 31 December 2024.

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



OUR STRUCTURE

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

Names of Subsidiary Entities	ACN	Country of Incorporation
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 with and consulted 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, which is headquartered in Sant Cugat del Vallès, Barcelona, Spain. As a global leader in the pool and wellness industry, the Group operates across 47 countries. We specialise in the design, manufacture, and distribution of swimming pool equipment and chemicals for both residential and commercial markets. Our brand portfolio includes many of the industry’s most recognised names, including Jandy®, AstralPool®, Polar-is®, Cepex®, Zodiac®, CTX Professional®, Gre®, SR Smith®, and Barracuda®.

AFFILIATION WITH INTERNATIONAL ASSOCIATIONS

Fluidra fully upholds the principles set out in the Universal Declaration of Human Rights, as well as the core conventions of the International Labour Organization relating to freedom of association, the right to collective bargaining, and the elimination of child and forced labour.

In line with this commitment, the Fluidra Group is a signatory to the United Nations Global Compact and supports its 10 principles covering Human Rights, Labour, Environmental Protection, and Anti-Corruption.

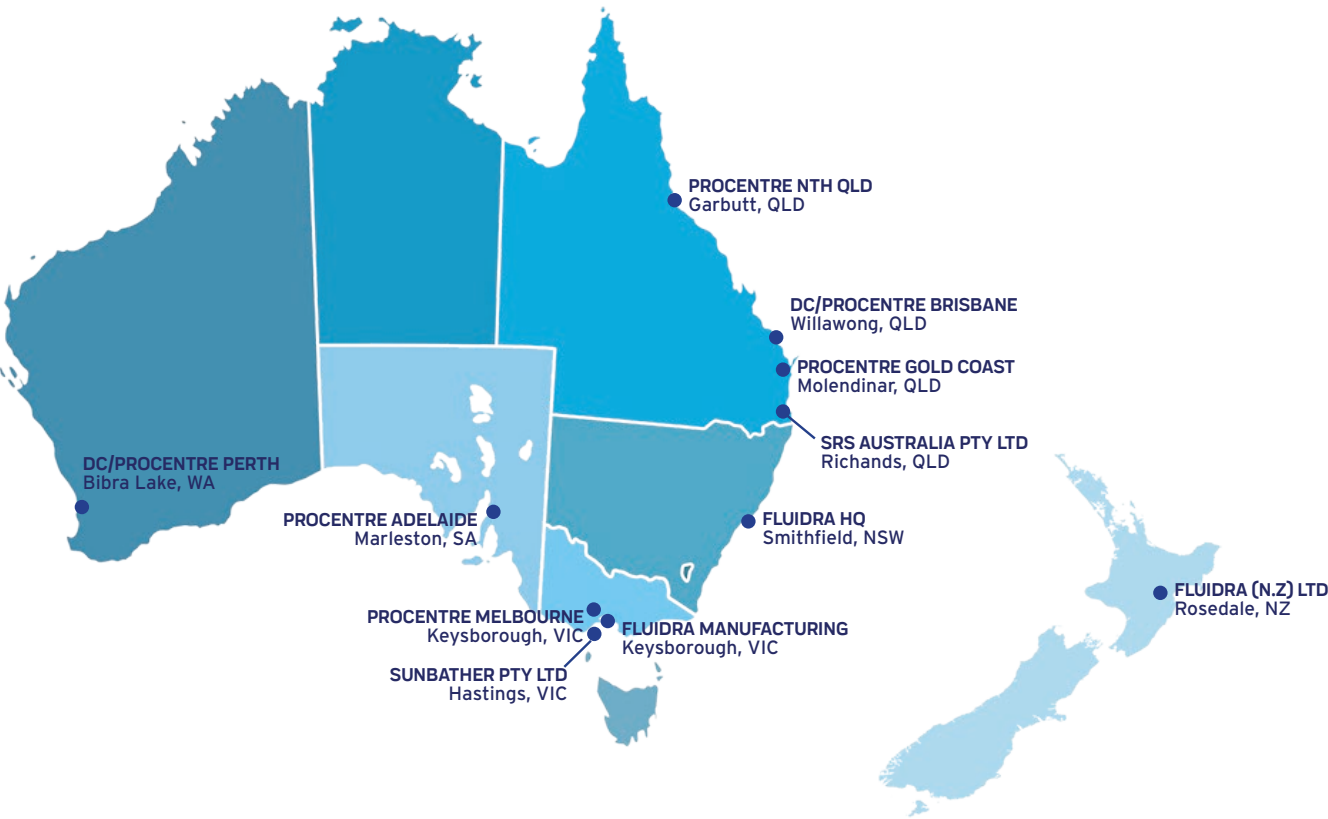


OUR OPERATIONS & SUPPLY CHAIN

At Fluidra Australia, we maintain ongoing relationships with all 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. Many of these products are manufactured locally at our facilities in Victoria and Western Australia, while others are sourced from our global operations in China, Europe, South Africa, and North America. We also distribute products made by third-party manufacturers in countries such as China, Malaysia, Taiwan, South Korea, and others.

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

401

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.

While we are not directly involved in or contributing to modern slavery practices, we acknowledge that potential risks may exist within the broader supply chain, particularly beyond our direct suppliers. We are committed to proactively identifying, preventing, addressing, and remediating any instances of modern slavery if and when they arise.

IDENTIFYING MODERN SLAVERY RISKS

- Continuing our efforts from previous years, we remain committed to engaging our suppliers in our modern slavery due diligence processes. We actively encourage all suppliers to complete our modern slavery self-assessment questionnaire. In 2023, we distributed these questionnaires to suppliers acquired through our 2022 acquisitions of Sunbather Pty Ltd and SRS Australia Pty Ltd. These suppliers have since been incorporated into our supplier risk matrix, which evaluates risk based on the geographic location of supplier facilities. Countries identified as high-risk include China, Hong Kong, Taiwan, and Thailand.

In 2024, we have extended this process to include any new suppliers, requiring them to complete the self-assessment questionnaire as part of our onboarding procedures. We also plan to distribute the questionnaire to suppliers recently onboarded through our acquisition of Chadson Engineering and will incorporate these suppliers into our risk matrix in due course.

Our global parent company continues to perform detailed audits of critical suppliers as part of its broader due diligence framework. Suppliers are reviewed on a three-year cycle.

As part of our ongoing global compliance requirements, we also encourage all suppliers to review and acknowledge our Supplier Code of Ethics. This Code sets out the mutual commitment between Fluidra and its suppliers to uphold the principles of the Universal Declaration of Human Rights, the Rights of the Child, 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

- As a signatory to the United Nations Global Compact, Fluidra is deeply committed to upholding internationally recognised human rights. This commitment is reflected in the Group's ESG Policy, Code of Ethics, and Supplier Code of Ethics, which set clear expectations for all stakeholders. To support this commitment, 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, illustrated in the diagram below:

Human rights management framework



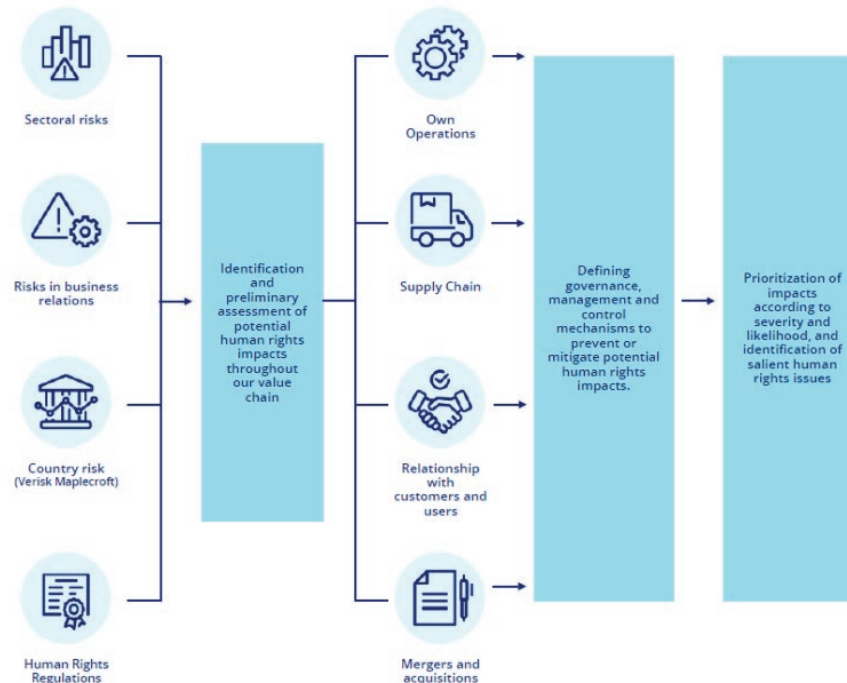
Human Rights Due Diligence

- Since 2021, our global parent company 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. In 2023, the monitoring of these risks was integrated into the materiality assessment process, which is reviewed every two years.

Audits and Impact Management

- To improve the accuracy of risk identification, third-party providers conducted on-site audits in 2023, with this process continuing through 2024. Where non-conformities were identified, specific mitigation plans were implemented. In parallel, the Procurement Department assesses human rights risks within the supply chain as part of the supplier approval and ongoing performance evaluation process.
- The objective is to ensure that all identified negative impacts, 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 will 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 to the right.
- Fluidra maintains a confidential, externally managed grievance channel available in 16 languages. It allows anonymous reporting of breaches of the Code of Ethics, policies, or law, in line with the UN Guiding Principles. Oversight is provided by the Ethics Committee, ensuring that complaints are handled transparently and that remediation processes are in place when human rights impacts are identified.
- 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. The Company strictly prohibits practices such as debt bondage, involuntary prison labour,

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



forced marriage, and human trafficking. As part of our ethical hiring practices, workers 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 zero-tolerance policy. We only employ individuals who meet the legal minimum working age. As of the end of 2024, there were no employees under 18 years old within our workforce.
- No instances of modern slavery were detected in Fluidra Australia in 2024 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 2024:

- The Procurement Department 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 Supplier Code of Ethics and related due diligence processes.
- Our Supplier Code of Ethics 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. Suppliers are required to adhere to these standards unless they have an equivalent code of conduct. In cases of non-compliance, Fluidra may 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 local sourcing teams. No breaches, complaints, or alerts were recorded in 2024 or the previous year.
- Fluidra has established procedures to monitor procurement activities and manage incidents across its value chain. The Procurement Department holds monthly meetings to track initiative progress, and work is underway to formalize roles and responsibilities under the updated Global Procurement Policy, expected to be approved in the coming year to strengthen sustainable supply chain management.

Aligned with our commitment to sustainability and human rights, Fluidra applies several core policies across all operations to manage supply chain risks and impacts. These include the ESG Policy, the Supplier Code of Ethics, the Procurement Directive, and the forthcoming Global Procurement Policy.

- Fluidra does not currently communicate directly with supply chain workers or their representatives. Instead, we work with the commercial contacts of our direct suppliers. These contacts take part in training sessions, sign the Supplier Code of Ethics, fill out evaluation forms, and help coordinate external audits.

The only way we currently hear from supply chain workers is through interviews done by Achilles (a company that specializes in supply chain assessment and monitoring) 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 audits. Any serious issues identified are flagged in the audit report and followed up with an action plan. Second, concerns can also be raised through our reporting channel, which is explained during annual training sessions for supplier representatives. These representatives are expected to share this information with their workers.

If a concern is reported, Fluidra's Ethics Committee and the Global Procurement team investigate and take steps to fix or manage the issue.

- In 2022, Fluidra approved a Supplier Approval 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—before starting or continuing a business relationship with them.

MANAGING MODERN SLAVERY RISKS

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 Procurement, 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 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 the help of our partner Achillies a total of 27 suppliers to Fluidra Australia, including 9 audits completed in 2024, with an additional 8 planned for 2025. We are committed to auditing all critical suppliers on a three-year rotation. No modern slavery risks were identified for Fluidra Australia in 2024.

TRAINING

We continue to provide modern slavery training to all employees directly involved in procurement, HR, and selected senior managers. In 2024, we delivered 6 hours of training to new employees as part of their onboarding, with approximately 36 hours of refresher training scheduled for 2025 for those directly involved in procurement, HR and senior management.

Additionally, in 2023, we conducted information campaigns on human rights issues for all employees. These campaigns continued in 2024, reinforcing our ongoing commitment to raising awareness across the organisation.



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 of Ethics 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.	Procurement Policy	This policy outlines the fundamental principles and procedures for acquiring raw materials, components, services, fixed assets, and externally produced goods. It aims to promote consistent purchasing practices that uphold fiscal responsibility, maintain proper documentation, and ensure ethical conduct.
ESG Policy	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.	General Compliance Policy	In line with our commitment to exemplary corporate governance and the continuous enhancement of our compliance systems, we have established a set of rules and policies overseen by the Director of the Group's Internal Audit and Compliance Department. This policy is designed to foster a proactive culture rooted in the principle of "zero tolerance" for any unlawful actions or violations of ethical and responsible conduct, both within the organization and in its interactions with customers, suppliers, and third parties.
Suppliers Code of Ethics	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.	Whistle-blower hotline	We have established a Whistleblower Management Procedure that 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.
Global Sanctions Policy	This policy 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.	Supplier Qualification Procedure	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.

METHODS TO ASSESS THE EFFECTIVENESS OF OUR ACTIONS

Fluidra Australia remains firmly committed to opposing 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. **Training:** Continue mandatory induction training for new employees, along with regular 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 signed Supplier Codes of Ethics from our suppliers.
3. **Contractual Safeguards:** Continue 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.
5. **Local Supplier Risk Management:** Continue assessing the risk profiles of local service providers to identify potential vulnerabilities and ensure appropriate mitigation strategies are in place.

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

Clinton Alley
Director

30 June 2025



