



Hayward Holdings, Inc.

Human Rights Policy

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PREPARED BY: Susan Canning	REVIEWED BY: Committee on Policy Review and Approval	APPROVED BY: Committee on Policy Review and Approval	

POLICY PURPOSE

Hayward Holdings, Inc. (“the Company”), its subsidiaries, and any ventures that are controlled by the Company has established this Human Rights policy to inform employees, business partners and customers of Hayward’s commitment to human rights. It is integral to our business strategy and success that we have a positive impact when dealing with our clients, suppliers, employees and wider society wherever we do business.

POLICY STATEMENT

The Company and its management believe in operating with integrity, trust, and respect. These values guide our behavior as we pursue our mission and our business strategies. The Company’s Human Rights Policy builds upon this strong foundation. We are committed to maintaining a corporate culture that respects the principles aimed at promoting, protecting and supporting all internationally recognized human rights.

The Company’s commitment to promoting human rights applies to all persons involved in the Company’s operations including, but not limited to, Company employees, officers, contractors, leased workers, suppliers, vendors, and customers. In situations where the Company does not have overall control of operations, we will take reasonable steps to ensure that involved parties follow human rights principles.

POLICY

At Hayward, we are committed to upholding human rights and conducting our business in a manner consistent with the United Nations Guiding Principles on Business and Human Rights. We support the principles and standards outlined in the International Labor Organization (ILO) Core Conventions on Labor Standards and the ILO Declaration on Fundamental Principles and Rights at Work. As part of Hayward’s resolve to protect, respect, and promote human rights in our relationships with our employees, customers, and suppliers, we:

- Do not tolerate disrespectful behavior, unfair treatment, or retaliation of any kind.
- Abide by all labor laws and regulations and do not tolerate any form of discrimination or harassment based on gender, race, color, disability, ethnicity, nationality, religion, sexual orientation, veteran status, or any other status protected by law.
- Work to provide and maintain a safe, healthy, and productive workplace, by addressing and remediating identified risks of accidents, injury, and health impacts.
- Prohibit the use of all forms of forced labor including prison labor, indentured labor, bonded labor, and military labor, any forms of slavery, and any form of human trafficking.

- Do not tolerate the use of child labor in any form.
- Work to drive full compliance with applicable wage, work hours, overtime, benefit, and all other applicable labor and employment laws.
- Support freedom of association and the rights of our employees to lawfully and peacefully associate, organize, and bargain collectively.
- Strive to create workplaces in which all employees are valued and respected.

We provide training to Company employees on the topics outlined within our Code of Conduct and Ethics policy. Employees can submit complaints through our anonymous, confidential hotline (online at <http://haywardspeakup.ethicspoint.com>, via mobile device using QR codes available on local posters, or by calling toll-free and local numbers available via the EthicsPoint website. More information on access to grievance mechanisms can be found in our Code of Conduct and Ethics policy.