



Hayward Holdings, Inc.  
Conflict Minerals Policy

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## POLICY PURPOSE

Hayward Holdings, Inc. ("the Company" or "Hayward"), its subsidiaries, and any ventures that are controlled by the Company has established this Conflict Minerals Policy ("Policy") as a supplement to our Supplier Code of Conduct policy, which provide guidelines and expectations we have of our suppliers. The Company is committed to fair, honest, and ethical business practices and strives to work with suppliers and vendors that share our values.

## POLICY STATEMENT

Hayward is committed to avoiding and eliminating the use of conflict minerals such as tantalum, tin, tungsten, or gold, as the proceeds from the sale of such minerals may be used to directly or indirectly finance extraordinary violence ("Conflict Minerals") in the Democratic Republic of the Congo ("DRC") and surrounding countries (the "Covered Countries"), as defined by the Dodd-Frank Wall Street Reform and Consumer Protection Act. Hayward is committed to complying with the Conflict Minerals rules and reporting requirements adopted under the Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act, which addresses concerns that proceeds from the trade and exploitation of certain minerals such as tantalum, tin, tungsten, or gold.

Hayward will seek products and components that are free of conflict minerals, or use only those that are sourced:

- Outside of the DRC and Covered Countries;
- From scrap or recycled sources; or
- From smelters and refiners that have been certified to be conflict free.

Hayward expects each of its suppliers to cooperate with our Conflict Minerals reporting process. In furtherance of this policy, we expect our suppliers to:

- Adhere to the U.S. Securities and Exchange Commission's rules regarding Conflict Minerals, as directed by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act;
- Make commitments or have in place policies that adhere to the standards outlined in this document;
- Implement measures to trace Conflict Minerals to the smelter or refiner level and facilitate the sourcing of minerals from smelters and refiners certified as conflict free (see [www.conflictreesmelter.org](http://www.conflictreesmelter.org));
- Provide Hayward with verification of the country of origin and source of the materials or other written information or certifications concerning the origin of conflict minerals included in the materials and components supplied to Hayward; and
- Require their direct and indirect suppliers to adhere to the same standards outlined in this document.

In accordance with this policy and in an effort to conduct supply chain due diligence, Hayward has developed an internal cross functional team and partnered with Source Intelligence to determine the origin of any Conflict Minerals in our supply chain. We are committed to working towards material traceability and performing due diligence consistent with guidance put forth from the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including the assessment of our smelters, refiners, and countries of origin for our materials.

Hayward is committed educating and collaborating with our suppliers and other industry-wide stakeholders to uphold the commitments outlined in this policy.

Any questions or concerns regarding Hayward's Conflict Minerals policy or procedures should be directed to [conflictminerals@hayward.com](mailto:conflictminerals@hayward.com).