



Hayward Holdings, Inc.
Supplier Code of Conduct

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POLICY PURPOSE

Hayward Holdings, Inc. (“the Company”), its subsidiaries, and any ventures that are controlled by the Company has established this Supplier Code of Conduct policy to provide guidelines and expectations we have of our suppliers. 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. The Company is committed to building environmental sustainability, social responsibility, and effective corporate governance into all aspects of its business.

POLICY STATEMENT

We 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 Supplier Code of Conduct builds upon this strong foundation. The Supplier Code applies to all Suppliers that provide goods and services to the Company. We expect our Suppliers to hold their supply chain, including subcontractors to the same standards contained in the Supplier Code of Conduct. The Supplier Code provides guidelines for business conduct but does not replace the specific requirements in supplier contracts. Suppliers must always comply with contractual requirements. The Supplier Code does not alter contractual terms or constitute express or implied contractual obligations or contracts of employment. Additionally, the Supplier Code of Conduct may be used as a guide to evaluate prospective vendors based on environmental and labor management performance.

The Company suppliers must comply with all applicable federal, state, local, and foreign laws. Suppliers who operate outside the United States must also comply with applicable laws in the countries in which they operate. If the standards or requirements set forth in this code or in the contract are greater than applicable law, then the Supplier shall follow the higher standard. We are committed to regularly evaluate suppliers on their compliance, as well as engaging non-compliant suppliers to uphold our values to the highest standards.

STANDARDS OF CONDUCT

The Company is committed to fair, honest, and ethical business practices and strives to work with suppliers and vendors that share our values. We expect our suppliers to adhere to the following principles and applicable laws and governmental regulations wherever we operate:

- **Child Labor:** Hayward does not employ people under the age of 16, irrespective of whether local laws provide for a lower minimum age. We expect the same from all companies in our supply chain that contribute to the products and services we procure.
- **Diversity and Inclusion:** Suppliers are encouraged to provide opportunities to diverse suppliers and businesses when supplying goods to the Company.

- **Ethics:** Supplier will conduct business ethically, and with integrity, honoring fair business practices, and operating without ignoring social responsibilities, while avoiding improper advantages, with zero tolerance for bribery and corruption, without disclosure of proprietary information or intellectual property while employing fair advertising and competition practices, responsible sourcing, adhering to international trade laws and all privacy laws, and conducting necessary risk assessments and adhering to proper management standards.

Supplier of the Company's operations outside the United States must be sensitive to foreign legal requirements and US laws that apply to foreign operations, including the Foreign Corrupt Practices Act ("FCPA"), that makes it unlawful to make a payment and/or offered anything of value to foreign government officials, government agencies, political parties, political candidates, or in some cases, anyone, to influence the action taken by such individual or agents to gain a competitive or improper business advantage.

- **Environmental Impact:** Supplier will abide by all applicable laws regarding air emissions, hazardous materials management, materials disposal, product content restrictions, resource efficiency, and wastewater and solid waste management and disposal. Additionally, suppliers are encouraged to source materials responsibly and procure sustainable materials when feasible to reduce the environmental impacts.
- **Forced Labor:** Supplier will prohibit the use of slavery or human trafficking in their facilities and operations, as well as the use of any form of forced, coerced, indentured or compulsory labor.
- **Health & Safety:** Supplier will comply with all applicable health and safety laws and regulations to assure the health, safety, and well-being of employees and visitors and provide safe and healthy working conditions.
- **Nondiscrimination:** Supplier will offer fair and equal employment decisions, including, without limitation, decisions regarding recruitment, selection, hiring, compensation, benefits, training, advancement, discipline, discharge, and other terms, conditions, and privileges of employment, based on individual qualifications, without regard to race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status, or any other classes protected by law.
- **Living Conditions:** Suppliers will comply with all applicable building codes and housing standards to ensure employees have acceptable local living conditions which are safe, hygienic, and conducive to their overall wellness.
- **Freedom of Association, Right to Organize and Collective Bargaining:** Suppliers will abide by and protect employees' rights to form and join trade unions freely, to bargain collectively and to engage in peaceful assembly in accordance with the International Labor Organization (ILO) Convention 87 and 98.
- **Fair Treatment:** Suppliers will treat workers with respect and fairness and shall not expose workers to corporal punishment, disciplinary measures or any behaviors infringing upon one's dignity, liberty, and basic human rights.

- **Wages:** Supplier will comply with the applicable national regulations and agreements concerning wages, which should be at least equal to the living wages based on the place of work done. This should also incorporate legally mandated benefits, such as paid time-off and social security. In situations of overtime work, wages should be paid at a premium rate.
- **Working Hours:** Supplier will comply with applicable laws, regulations, and agreements concerning working hours which should not exceed sixty hours per week including overtime. In addition, workers should get at least one day off after six days of subsequent work.
- **Responsible Sourcing of Minerals:** Supplier shall comply with Hayward's efforts to research whether Conflict Minerals (i.e., tin, tantalum, tungsten and gold) are in the products they manufacture.