

HAYWARD HOLDINGS, INC.

CODE OF ETHICS FOR SENIOR EXECUTIVE AND FINANCIAL OFFICERS

1. Purpose of Code of Ethics. The purpose of this Code of Ethics for Senior Executive and Financial Officers (this “Code”) is to promote: (i) the honest and ethical conduct of Senior Executive and Financial Officers (as defined below), including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; (ii) full, fair, accurate, timely and understandable disclosure in periodic reports and documents required to be filed by Hayward Holdings, Inc. (the “Company”) with the Securities and Exchange Commission (the “SEC”) and in other public communications made by the Company; and (iii) compliance with all applicable laws, rules and regulations that apply to the Company and its Senior Executive and Financial Officers.

The Company’s [General Counsel], or such other officer as is designated by the Chief Executive Officer, shall serve, in consultation with the Chief Executive Officer, as the Compliance Officer (the “Compliance Officer”) for purposes of this Code, as well as the administrator of this Code. In the absence of the Compliance Officer, another employee designated by the Compliance Officer (or, if the Compliance Officer is unavailable, by the Chief Executive Officer, and, if the Chief Executive Officer is unavailable, by the Chief Financial Officer) shall be responsible for the administration of this Code. All determinations and interpretations by the Compliance Officer or his or her delegate shall be final and not subject to further review.

2. Introduction. This Code is applicable to the following officers of the Company (together, the “Senior Executive and Financial Officers”): Chief Executive Officer (Principal Executive Officer), Chief Financial Officer (Principal Financial Officer and Principal Accounting Officer), [Executive Vice President and Chief Commercial Officer] and the Treasurer and Corporate Controller (and any persons performing similar functions).

References in this Code to the Company mean the Company or any of its subsidiaries. While the Company expects honest and ethical conduct in all aspects of its business from all of its employees, the Company expects the highest possible honest and ethical conduct from its Senior Executive and Financial Officers. Senior Executive and Financial Officers are expected to serve as an example for other employees and the Company expects such officers to foster a culture of transparency, integrity and honesty. Compliance with this Code is a condition to employment for each Senior Executive and Financial Officer and any violations of this Code may result in disciplinary action, up to and including termination of employment. This Code is supplemental to, and is not a replacement of, the Code of Conduct applicable to all Company employees. Senior Executive and Financial Officers remain subject to the Code of Conduct and in the event of any conflict between a provision in this Code and in the Code of Conduct, should adhere to the more stringent provision.

Waivers of this Code may be made only by the Company’s Board of Directors or the Audit Committee thereof and will be disclosed in accordance with applicable law and rules under the New York Stock Exchange.

3. Conflicts of Interest. A conflict of interest occurs when private interests interfere, or appear to interfere, in any way, with the interests of the Company as a whole. Conflicts of interest can also arise when action is taken or an officer or a member of his or her family have interests that may make it difficult for such officer to perform his or her duties to the Company effectively. Although we cannot list every conceivable conflict, the following are some common examples that illustrate actual or apparent conflicts of interest that should be avoided:

3.1. Improper Personal Benefits. Conflicts of interest arise when an officer or a member of his or her family receives improper personal benefits as a result of his or her position in the Company. Senior Executive and Financial Officers may not accept any benefits from the Company that have not been duly authorized and approved pursuant to Company policy and procedure, including any Company loans or guarantees of personal obligations.

3.2. Financial Interests in Other Businesses. Senior Executive and Financial Officers should avoid having an ownership interest in any other enterprise if that interest compromises or appears to compromise his or her loyalty to the Company. For example, Senior Executive and Financial Officers may not own an interest in a company that competes with the Company or that does business with the Company (such as a supplier) unless written approval is obtained from the Compliance Officer before making any such investment. However, it is not typically considered, and the Company does not consider it, a conflict of interest (and therefore prior written approval is not required) to make investments in competitors, clients or suppliers that are listed on a national or international securities exchange so long as the total value of the investment is less than one tenth of one percent (0.1%) of the outstanding stock of the corporation and the amount of the investment is not so significant that it would affect an officer's business judgment on behalf of the Company.

3.3. Business Arrangements with the Company. Senior Executive and Financial Officers may not participate in a joint venture, partnership or other business arrangement with the Company without the prior written approval of the Compliance Officer.

3.4. Corporate Opportunities. If a Senior Executive and Financial Officer learns of a business or investment opportunity through his or her position at the Company or information gained as a result of his or her position, such as from a competitor or actual or potential supplier or business associate of the Company (including a principal, officer, director or employee of any of the above), such Senior Executive and Financial Officer may not participate in the business or make the investment without the prior written approval of the Compliance Officer. Such an opportunity should be considered an investment opportunity for the Company in the first instance.

3.5. Outside Employment or Activities with a Competitor. Simultaneous employment with or serving as a director of a competitor of the Company is strictly prohibited, as is any activity that is intended to or that should reasonably be expected to advance a competitor's interests at the expense of the Company's interests. Senior Executive and Financial Officers may not market products or services in competition with the Company's current or potential business activities. It is the responsibility of each

Senior Executive and Financial Officer to consult with the Compliance Officer to determine whether a planned activity will compete with any of the Company's business activities before such Senior Executive and Financial Officer pursues the activity in question.

3.6. Outside Employment with a Supplier. Without the prior written approval of the Compliance Officer, Senior Executive and Financial Officers may not be a supplier to or be employed by, serve as a director of or represent a supplier to the Company. Without the prior written approval of the Compliance Officer, Senior Executive and Financial Officers may not accept money or benefits of any kind from a third party as compensation or payment for any advice or services provided to a client, supplier or anyone else in connection with their business with the Company.

3.7. Family Members Working in the Industry. If a Senior Executive and Financial Officer's spouse or significant other, child, parent or in-law, or someone else with whom such Senior Executive and Financial Officer has a financial relationship is a competitor or supplier of the Company or is employed by one, such Senior Executive and Financial Officer must disclose the situation to the Compliance Officer so that the Company may assess the nature and extent of any concern and how it can be resolved. Each Senior Executive and Financial Officer must carefully guard against inadvertently disclosing Company confidential information and being involved in decisions on behalf of the Company that involve the other enterprise.

3.8. Fair Dealing. Senior Executive and Financial Officers should always endeavor to deal fairly with Company customers, suppliers, competitors and employees. Senior Executive and Financial Officers should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or any other unfair-dealing practices.

If you have any doubt as to whether or not conduct would be considered a conflict of interest, please consult with the Compliance Officer.

4. Accurate Periodic Reports and Other Public Communications.

4.1. Accuracy of Company Records and Reporting. Full, fair, accurate, timely and understandable disclosures in the Company's periodic reports filed with the SEC and in our other public communications is required by SEC rules and is essential to the Company's continued success. Each Senior Executive and Financial Officer is expected to exercise the highest standard of care in preparing such materials. The Company has established the following guidelines in order to ensure the quality of its periodic reports:

- all Company accounting records, as well as reports produced from those records, must be kept and presented in accordance with the laws of each applicable jurisdiction;
- all records must fairly and accurately reflect the transactions or occurrences to which they relate;

- all records must fairly and accurately reflect in reasonable detail the Company's assets, liabilities, revenues and expenses;
- the Company's accounting records must not contain any false or intentionally misleading entries;
- no transaction may be intentionally misclassified as to accounts, departments or accounting periods or in any other manner;
- all transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period;
- no information may be concealed from the internal auditors or the independent auditors; and
- compliance with Generally Accepted Accounting Principles and the Company's system of internal accounting controls is required at all times.

It is the responsibility of each Senior Executive and Financial Officer to promptly bring to the attention of the internal working group responsible for the review of the Company's periodic SEC reports (the "Disclosure Committee") any information of which he or she may become aware that materially affects the disclosures made by the Company in its public communications. Each Senior Executive and Financial Officer also shall bring promptly to the attention of the Disclosure Committee any information he or she may have concerning (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

4.2. Confidential Information. Senior Executive and Financial Officers may be entrusted with the Company's confidential business information. Each Senior Executive and Financial Officer is required to safeguard and use such information only for Company purposes. Confidential information includes all non-public information that might be of use to competitors or harmful to the Company or its customers if disclosed. Each Senior Executive and Financial Officer is expected to maintain the confidentiality of any and all such information entrusted to them by the Company or its customers.

Failure to observe this duty of confidentiality may compromise the Company's competitive advantage over competitors and may additionally result in a violation of securities, antitrust or employment laws. It may also violate agreements providing for the protection of such confidential information. Senior Executive and Financial Officers should not discuss confidential Company information outside the Company with anyone, including family, and should limit discussions of confidential information inside the Company to members of the team involved with the particular project.

4.3. Insider Trading Prohibited. It is illegal and against this Code for any person, either personally or on behalf of others, to buy or sell securities while in possession of material nonpublic information or to communicate (or "tip") material nonpublic

information to another person who trades in the securities on the basis of the information or who in turn passes the information on to someone who trades. Please see the Company's Insider Trading Policy for additional details and responsibilities.

5. Compliance with Laws and Ethics Code. Senior Executive and Financial Officers must always act in good faith, responsibly, with due care and diligence and without knowingly misrepresenting material facts or allowing independent judgment to be subordinated to the best interests of the Company. Each Senior Executive and Financial Officer is expected to comply with both the letter and spirit of all applicable laws, governmental rules and regulations and this Code, and is expected to promptly report any suspected violations of applicable laws, governmental rules and regulations or this Code to the Compliance Officer. No one will be subject to retaliation because of a good faith report of a suspected violation. Each Senior Executive and Financial Officer will be held accountable for his or her adherence to this Code. Failure to comply with this Code or any applicable laws, rules or regulations, may result in disciplinary action, up to and including termination of employment.

6. No Rights Created. This Code is a statement of certain fundamental principles, policies and procedures that govern the Senior Executive and Financial Officers in the conduct of the Company's business. It is not intended to and does not create any rights in any employee, customer, supplier, competitor, stockholder or any other person or entity.

Effective: March 11, 2021

ACKNOWLEDGMENT FORM

I have received and read the Code of Ethics for Senior Executive and Financial Officers, and I understand its contents. I agree to comply fully with the standards contained in the Code of Ethics and the Company's related policies and procedures. I understand that I have an obligation to report to the Compliance Officer any suspected violations of the Code of Ethics.

I also acknowledge that I have reported any areas of non-compliance with the Code of Ethics to the Compliance Officer and have summarized such areas, if any, in the section below.

Printed Name and Title

Signature

Date

Identification and explanation of any areas of non-compliance with the Code of Ethics for Senior Executive and Financial Officers: