

# CRIME PREVENTION AND CONTROL POLICY

### DOCUMENT INFORMATION

<b>Document Type</b>	Global Policy
<b>Description</b>	Crime Prevention and Control Policy
<b>Effective Date</b>	27/02/2024
<b>Scope</b>	This Policy applies to all Fluidra Companies
<b>Purpose</b>	This Policy constitutes a cornerstone for the Fluidra Group in the prevention of possible criminal offences that may be committed within the Company in the different areas in which it carries out its activities
<b>Sponsor</b>	Global Internal Audit & Compliance
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### 1. INTRODUCTION

Fluidra S.A. (hereinafter, "**Fluidra**" or the "**Company**"), is the parent company of a group of companies whose main activity consists of the manufacture and marketing of accessories and specific machinery for swimming pools, irrigation and water treatment and purification (hereinafter, any of these entities shall be referred to individually as "**Fluidra**" and, as whole, shall be referred to as "**Fluidra Group**").

The Crime Prevention and Control Policy (hereinafter, the "**Policy**") stems from **Fluidra's Code of Ethics** and is the standard on which Fluidra's Crime Prevention Model is based.

It has been drawn up on the basis of Organic Law 10/1995, of 23 November, of the Criminal Code (and its subsequent amendments); Circular 1/2016 of the State Attorney General's Office on the criminal liability of legal persons; the case law of the Supreme Court in this area and, lastly, the main best practice standards (UNE 19601 and UNE-ISO 37301).

In accordance with the provisions of the aforementioned regulations, the Policy constitutes a cornerstone for the Fluidra Group in the prevention of possible criminal offences that may be committed within the Company in the different areas in which it carries out its activities. This Policy has been approved by the Company's Board of Directors in the exercise of its function of approving the Company's general policies and strategies, in accordance with the provisions of the Regulations of the Board of Directors.

The Policy helps to reinforce the Company's commitment to zero tolerance of any criminal act or conduct that goes against the principles set out in the **Company's Code of Ethics**.

### 2. SCOPE

This Policy shall apply to all employees, managers and directors of the Fluidra Group in all activities arising from their position or duties, including those investee companies over which the Company has effective control, within the limits provided for in the applicable regulations.

The contents of this Policy may extend to persons or entities that do not belong to Fluidra, whenever they have a business or professional relationship with the Company and their actions represent a risk or liability for the Company or may directly or indirectly affect its reputation or good name, and provided that the agreement is adopted at the appropriate level.

### 3. GENERAL PRINCIPLES

The basic aim of Fluidra's Crime Prevention Model is to promote a true ethical business culture, by establishing all the surveillance and control measures within its reach to prevent the commission of crimes within the Company.

Accordingly, Fluidra has established the following general principles that act as guidelines of behaviour for Fluidra and all persons described in the previous section:

#### 3.1. Compliance with the Law

All employees of the Fluidra Group accept as their own the principles of respect for the law, integrity, honesty and transparency established in the Company's Code of Conduct.

All those who are part of the Fluidra Group undertake to act in accordance with current laws through ethical and upright behaviour, avoiding any unlawful conduct and, in particular with regard to this Policy, any kind of criminal conduct.

Fluidra is committed to implementing the range of measures necessary to prevent and detect the commission of criminal acts in all areas of the Group's activities in which its directors, managers and employees are involved and in its relations with third parties, thereby promoting a preventive culture based on the principle of "zero tolerance" towards the commission of unlawful acts.

#### 3.2. Communication Channels

Fluidra has set up suitable internal channels to encourage the reporting of possible irregularities, which guarantee both the rights of informants and those of the persons under investigation.

One such Communication Channel is Fluidra's Confidential Channel, which is open to employees, customers, suppliers and any other stakeholders for the purpose of raising any questions or suspicions of criminal activity confidentially and/or anonymously. Fluidra's Confidential Channel has its own internal regulations, which have been drawn up in an environment of transparency and compliance with applicable laws.

#### 3.3. Prohibition of Retaliation

Fluidra will not tolerate any kind of threat or retaliation against those who make use of the Communication Channels set up to report or communicate an activity that might be considered

criminal or is suspected of being criminal, or against those who participate or assist in its investigation, provided that they act in good faith.

Likewise, Fluidra will not tolerate any type of reprisal against any employee who refuses to undertake any action that could be considered a criminal offence, and has set up the appropriate means for any employee of the Group to be advised on this matter at all times.

### 3.4. Crime Prevention Model

Fluidra has developed a Crime Prevention Model to identify, assess and manage the risks of non-compliance that may arise in the Group's activities, operations, products and services, as well as to identify controls and integrate them into the organisation's processes, through internal policies, management standards and action procedures.

Fluidra will regularly review the content of the Crime Prevention Model, the effectiveness of the controls included in it and the Internal Regulations for its implementation in order to detect any possible incidents and breaches, and to ensure that the requirements of any applicable criminal laws, recommendations and best practices in force at any given time are met.

### 3.5. Training

Fluidra has implemented appropriate awareness and training programmes for the Group's employees on the duties required by applicable laws at regular intervals to ensure that their knowledge of crime prevention is kept up to date.

In particular, training will be provided on the principles set out in Fluidra's Code of Ethics, the Crime Prevention Model, the Anti-Corruption Policy and any other policy and regulation developed for this purpose.

### 3.6. Disciplinary System

Fluidra shall penalise, in accordance with the provisions of applicable laws or the regime provided for in the corresponding Collective Bargaining Agreements, any conduct that goes against applicable laws or the Internal Policies, Procedures and Rules that make up the Crime Prevention Model, as well as any action that contributes to preventing or hindering the discovery of possible criminal or unlawful acts.

Likewise, the laws applicable in the different jurisdictions in which Fluidra carries out its activities shall be taken into account.

#### 4. CONFIDENTIAL CHANNEL

Should there be any knowledge, evidence or suspicion of criminal or unlawful practices within Fluidra or of the existence of a breach of this Policy, such facts must be reported through the Confidential Channel, available at the following link:

[ACCESS FLUIDRA'S CONFIDENTIAL CHANNEL](#)

Fluidra shall ensure compliance with the provisions of sections **3.2** and **3.3** of this Policy in relation to reports made through the Confidential Channel.

#### 5. APPROVAL

The current Crime Prevention and Control Policy was approved by the Board of Directors of Fluidra, S.A. on February 27<sup>th</sup>, 2024 and is mandatory for all employees of the Fluidra Group.