



The Pool Company

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| Effective Date: | October 30, 2023 |
| Last Update: | October 30, 2023 |
| Policy Owner: | EHS |

Environmental Policy

Latham Pool Products, Inc. (“Latham”) is committed to protecting the environment, the health and safety of our employees, and the communities in which we conduct our business. It is our policy to seek continual improvement to lessen our environmental impacts and improve efficiencies whenever possible to help us meet our sustainability and business objectives. To support our overarching goal of leaving this planet better than it is today, we commit to the following:

- Ensure compliance with all applicable laws, regulations, and standards, by maintaining an environmental management system that provides visibility from the bottom to the top level of management.
- Evaluate climate risks and opportunities and integrate them into Latham's business strategy as a core value driver.
- Measure, monitor, and report on greenhouse gas (“GHG”) emissions annually and drive activities to reduce GHGs.
- Reduce energy consumption and improve efficiency by deploying environmentally friendly technology such as motion sensors, the use of LED lights, increased procurement of renewable energy sources.
- Drive improvements that reduce waste generation and promote recycling.
- Support programs that strive to use environmentally friendly materials wherever possible to manufacture our products.
- Minimize consumption and improve efficiency by implementing policies and procedures regarding the use of natural resources in the supply, maintenance, and repair of our products and the management of natural resources across the company.
- Promote environmental awareness by delivering training, participating in community events, and setting specific environmental goals throughout the year.
- Consistently monitor Latham’s environmental performance and report regularly on environmental progress in our annual ESG Report.

The Executive Leadership Team of Latham has reviewed and approved this policy and is committed to ensuring that Environmental and Sustainability directives are an integral part of its Operational and Management functions. We commit to actively involve our internal and external stakeholders in our continuous environmental improvement initiatives through a committed ESG working group. Annually, the EHS Team will assess our performance against this policy and review the content of the policy to determine if revisions are needed. Each revision must be approved by Latham’s Leadership Team.

All employees and contractors working on Latham’s behalf are expected to fully comply with this policy. The policy will be covered with all employees when revisions are made or at least annually during training sessions or tailgate meetings. It will be communicated to contractors during the orientation at the beginning of any project.