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| Effective Date: | May 18, 2023 |
| Last Update: | May 18, 2023 |
| Policy Owner: | Legal/Procurement |

Conflict Minerals Policy

Introduction

Latham Group, Inc. (the “Company”) has adopted this Policy as part of its efforts to encourage its suppliers to respect human rights and to source conflict minerals, components, and products in a socially and environmentally responsible manner. This policy has been approved by Latham’s General Counsel and Vice President of Supply Chain who are also responsible for its implementation.

Regulatory Overview

On August 22, 2012, the Securities and Exchange Commission (the “SEC”) adopted a conflict minerals rule (the “Conflict Minerals Rule”) as mandated by Section 1502 of the Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Act. The Conflict Minerals Rule is intended to reduce a significant source of funding for armed groups that are committing human rights abuses in the Democratic Republic of the Congo (the “DRC”) and its adjoining countries. To the extent that Conflict Minerals (as defined below) are necessary to the functionality or production of products that the Company manufactures or contracts to manufacture, the Conflict Minerals Rule requires that the Company conduct supply chain diligence to determine whether the Conflict Minerals originated in the DRC or one of the other “Covered Countries,” or if the minerals originated from recycled or scrap sources. The Company is required to make certain disclosures regarding such diligence efforts and other related matters on Form SD, which is filed with the SEC.

“Conflict Minerals” are defined in the Conflict Minerals Rule as cassiterite, columbite-tantalite (coltan), gold, wolframite and three specified derivatives: tin; tantalum; and tungsten. In addition to the DRC, the “Covered Countries” are defined in the Conflict Minerals Rule as: (1) Angola; (2) Burundi; (3) Central African Republic; (4) the Republic of the Congo; (5) Rwanda; (6) South Sudan; (7) Tanzania; (8) Uganda; and (9) Zambia.

Latham supports sourcing of conflict-free Conflict Minerals from the Covered Countries in accordance with the Organization for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and the supplements thereto.

Policy Statement

The Company takes its obligations under SEC rules and other regulations seriously and intends to comply with the Conflict Minerals Rule. The Company is committed to using reasonable efforts, including partnering with its supply chain, to avoid the use of Conflict Minerals that directly or indirectly finance or benefit armed groups in the DRC or one of the other “covered countries.” The Company does not support general embargoes of conflict minerals from the covered countries, and instead encourages its suppliers to continue to source responsibly from conflict-affected and high-risk areas.

Latham expects each supplier to have its own policy in place and to conduct responsible Conflict Minerals sourcing within their own supply chains through due diligence practices that conform to the OECD Guidance and Latham’s Conflict



The Pool Company

Minerals requirements. Latham expects suppliers to provide copies of their policies and due diligence information on the sourcing of minerals in our supply chain as requested.

If a supplier does not meet our expectations, Latham will engage with that supplier as appropriate. We will continue to monitor global developments and the emergence of additional requirements or standards related to the sourcing of minerals from the Covered Countries as well as from other regions.

Suppliers are encouraged to contact the buyer with whom they regularly conduct business if they have questions concerning this policy.