

Environmental Health & Safety 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. The prevention of occupational injuries and illnesses, and ensuring compliance excellence with all applicable local, state, and federal requirements as well as appropriate industry standards are some of Latham's top priorities.

In fulfilling this commitment, we will provide and maintain a safe and healthful work environment through the implementation and support of our EHS program utilizing resources and clearly defined responsibility and accountability. We will strive to eliminate any foreseeable hazards which may result in personal injuries/illnesses, fires, security losses, and property damage. Environmental Health & Safety is the direct responsibility of all employees, at all levels of the organization.

All Leadership including the Executive Leadership and Senior Leadership Teams are committed to on- going continuous improvement to ensure all employees of Latham have a safe workplace.

We trust that all of you will join us in a personal commitment to health and safety as a way of life.

Environmental Health & Safety Principles

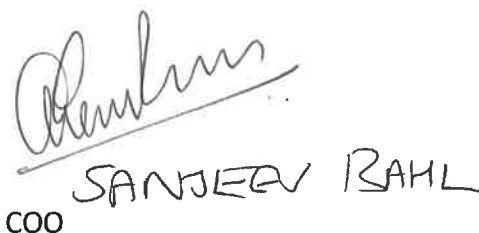
- Every employee is personally accountable and responsible as an owner of safety.
- Everyone is empowered to stop work when an unsafe condition exists.
- All incidents are preventable.
- Our culture is focused on continuous improvement of our workplace.
- We are committed to providing the necessary training resources to achieve a culture of continuous improvement in EH&S performance.
- We will regularly review and evaluate environmental, health, and safety programs, procedures, and practices to ensure that they are effective and up to date.
- Reporting and investigation of all incidents, including the establishment of effective corrective actions, will be timely and thorough.
- Safety is a condition of employment.

We sign this to signify our commitment to EHS and the above principles at Latham.



SEAN GADD

CEO



SANJEEV RAHL

COO