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Policy Owner:	Legal/Procurement

Code of Conduct for Suppliers

Introduction

Latham Group, Inc. (“Latham”) is the largest designer, manufacturer, and marketer of in-ground residential swimming pools in North America, Australia, and New Zealand. Our commitment to responsible stewardship is as relentless as our commitment to quality materials and manufacturing, extending from our workplaces to the world at large.

Purpose

The purpose of this Code of Conduct for Suppliers (the “Policy” or the “Code”) is to clearly establish and communicate Latham’s expectations of its suppliers, contractors, and vendors (all of which are referred to herein as “Suppliers”).

Compliance with Laws, Regulations, and Latham Policies

Our core values include the promotion of a healthy and safe work environment and value-added partnerships with our customers and Suppliers. We pride ourselves on creating a culture of collaboration and transparency. We make decisions based on these values, as well as execution, performance, and accountability, not necessarily what is cheapest, fastest, or easiest. Further, we are focused on sustainability across our operations. To that end, we want to partner with our Suppliers to further develop performance in our supply chain which aligns with these deeply held principles.

All Suppliers, including their respective directors, officers, managers, and employees, must comply with all applicable national, state and/or local laws and regulations, in addition to Latham’s policies. Where local laws or standards differ from this Supplier Code, we expect our Suppliers to comply with the more stringent standards and principles. Additionally, Suppliers must use their best efforts to drive implementation of the standards set forth in this Policy by their suppliers, vendors, and subcontractors.

Environmental

Environment, Health, and Safety

Suppliers are expected to establish an appropriate management system for Environmental, Health, Safety (EH&S) and Sustainability. Suppliers are expected to operate in a manner that actively identifies, manages and minimizes EH&S risks, conserves natural resources, minimizes emissions and releases, and protects the environment.

Suppliers are expected to protect the health, safety and welfare of their employees, contractors, visitors and any other stakeholders who may be affected by their activities. Latham expects that Suppliers will comply with all applicable environmental laws and regulations. Latham also expects that Suppliers will provide a workplace environment that is safe, secure and compliant with all applicable health and safety standards.

Conflict Minerals

Suppliers shall comply with Latham’s [Conflict Minerals Policy](#), as well as with applicable conflict minerals laws.



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Suppliers shall enact policies and programs to reasonably ensure that their activities and/or the activities of their suppliers do not benefit perpetrators of human rights abuses in the Democratic Republic of the Congo or in adjoining countries. Suppliers should exercise due diligence on the source and supply chain of custody and require the same from their next tier suppliers.

Harassment and Discrimination

Latham values diversity and expects Suppliers to remain receptive to diverse opinions and foster an ethical and inclusive culture. Suppliers should seek to hire and retain the best employees at all levels of the company without regard to race, color, religion, sex, sexual orientation, national origin, age, disability or veteran status. Suppliers are expected to maintain an environment that is free from physical, psychological and verbal abuse, or any other abusive conduct including but not limited to corporal punishment.

Recruitment, Forced Labor & Child Labor

We recognize and respect employees, and value their passion for excellence while holding everyone accountable for results. Employee freedom, health, and safety is essential to our organization. We believe that workers have the right to work in an environment free from unnecessary risk, discrimination, retaliation, harassment, and intimidation.

Suppliers are not to engage in forced, bonded, or indentured labor or involuntary prison labor. All work will be voluntary. There is to be no inhumane treatment or harassment, including any sexual harassment, sexual abuse, mental or physical coercion or verbal abuse of workers, nor is there to be the threat of any such treatment.

Child labor is prohibited. Human trafficking is prohibited. All persons performing work for Suppliers must meet minimum age limits, and work times are not to exceed the maximum, set by applicable laws, international treaties, and regulations.

Wages and Benefits

Suppliers must comply with all applicable legal standards regarding minimum compensation, benefits, overtime, and maximum hour rules established by laws and regulations in the applicable location. Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their legally required regular hourly payment rate. Deduction from wages as a disciplinary measure should not be permitted.

Social Dialog

Suppliers are expected to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference, or reprisal. Suppliers are also expected to recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.



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Governance

Ethics and Compliance with Laws

Latham has adopted a [Code of Conduct and Business Ethics Policy](#) and expects our Suppliers to do the same. Suppliers must conduct business in accordance with the highest ethical standards and Latham expects all Supplier employees to be sensitive to ethical considerations and the consequences of their actions. Suppliers must not seek to gain advantage by acting fraudulently, deceiving people, or making false claims, or by allowing anyone else to do so. Suppliers must comply with all laws and regulations in their country of operation, and with all other applicable laws and regulations, including those of countries in which it does business with or for Latham. Where local laws or standards differ from this Supplier Code, we expect our Suppliers to comply with the more stringent standards and principles.

Business Integrity

Any and all forms of corruption, money laundering, extortion and embezzlement are strictly prohibited. Suppliers shall refrain from making any improper payments of money or anything else of value to government officials, political parties, candidates for office, or any other persons. Suppliers shall not take unfair advantage of Latham through abuse of privileged or proprietary information, misrepresentation of material facts, or any other unfair or dishonest practices.

Suppliers are expected to exercise due diligence to detect and prevent corruption in all business arrangements, including but not limited to, partnerships, joint ventures, manufacturing or tolling agreements, and the hiring of intermediaries such as agents of consultants.

Fair Competition

Suppliers shall not engage in any misappropriation of confidential information, price fixing, bid rigging, or collusive conduct in connection with any transaction involving Latham. Suppliers are expected to understand and comply with all applicable laws regarding fair competition and antitrust.

Conflicts of Interest

Suppliers are expected to avoid all conflicts of interest or situations giving the appearance of or potential for conflict of interest with the interests of Latham. Suppliers shall not enter into a financial or any other relationship with a Latham employee that creates any actual, potential, or apparent conflict of interest with Latham. Latham employees may not serve as officers, directors, employees, agents, or consultants of Suppliers, except with the consent of appropriate Latham leadership. All conflicts discovered by Suppliers must be promptly disclosed and resolved to Latham's satisfaction.

Anti-Bribery and Anti-Corruption

Suppliers shall not offer, promise, or provide anything of value, including money, bribes, entertainment, or kickbacks, to any party in connection with any transaction involving Latham. This includes Latham employees, government officials, and any other third party. A government official includes, but is not limited to, any officer or employee of a foreign government, any department or agency or instrumentality thereof, or any person acting in an official capacity for, or on behalf of, any such persons or entities. A government official also includes an officer or employee of a public international organization or a candidate for political office or political party.



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Suppliers are expected to have adequate procedures in place to prevent their employees from engaging in bribery, including training employees on the requirements of the U.S. Foreign Corrupt Practice Act and the UK Bribery Act and other applicable anti-bribery and/or anti-corruption laws. Suppliers shall also ensure each of their subcontractors and agents comply with such anti-bribery and/or anti-corruption laws.

Latham employees are prohibited from demanding from Suppliers anything of value, such as gifts, payments, or other benefits.

Suppliers shall not offer any Latham employee or an employee's family members gifts, kickbacks, bribes, payments, fees, services, discounts, or other privileges in order to obtain favorable treatment from Latham. Under no circumstances should any Supplier use gifts or entertainment to bribe or attempt to bribe or secure or attempt or seek to secure a transaction opportunity or an improper or competitive advantage. Business-related meals and entertainment that are reasonable under the circumstances and token gifts or favors of nominal value which do not create a real or apparent sense of obligation are permitted, but only if consistent with local law and no government officials are involved.

Suppliers are expected to promptly report any violations of this Policy to Latham. (See below for directions on reporting.)

Intellectual Property and Data Protection

Suppliers shall protect all intellectual property and confidential information of Latham. Suppliers shall not misappropriate or misuse Latham's intellectual property and/or confidential information. Suppliers may use such property and information only upon obtaining Latham's authorization and only for the limited purpose authorized.

Suppliers in possession of Latham's intellectual property or confidential information must take appropriate actions to safeguard against the unauthorized disclosure or misuse of such property and information. All electronic records shall be protected from unauthorized access, destruction, use, modification, or disclosure. Suppliers shall comply with applicable data privacy laws.

Trade Controls and Customs Compliance

Suppliers shall comply with all applicable trade control laws and regulations in the import, export, or transfer of Latham products, components, and technical data. Latham is committed to strict compliance with applicable laws and regulations, including, but not limited to, U.S. export control, anti-boycott, and trade sanction laws and regulations. Suppliers shall have policies and procedures in place to ensure compliance with these legal requirements as they relate to Latham's products.

Monitoring and Compliance

Commensurate with the size and nature of their business, Suppliers are expected to establish and maintain systems for monitoring, recording, and managing their compliance obligations, as well as their obligations within this Code. Suppliers are encouraged to implement their own code of conduct and flow the principles to the entities that furnish them with goods and services. Latham expects Suppliers to establish and maintain effective programs that encourage their employees to make ethical, values-driven choices in their decision making.



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Latham reserves the right to monitor, review, and verify compliance with this Code and applicable laws and regulations by all Suppliers. In the event the expectations of this Code are not met, Latham may review the business relationship with the Supplier, and corrective actions pursued subject to the terms of the governing contract.

Accurate Records

Suppliers shall maintain accurate and adequate records pertaining to any transactions involving Latham, and to provide Latham access to such records upon request.

Whistleblower Protection

Suppliers are expected to provide employees with avenues for raising legal, ethical, or other concerns without fear of retaliation for complaints made in good faith. Suppliers are expected to take actions to prevent, detect, and correct any retaliatory actions.

Ways To Report Concerns

Subject to applicable local laws and regulations, Suppliers are expected to promptly notify Latham of any compliance or integrity matters involving or affecting Latham. The duty to report applies regardless of whether the concern involves the Supplier. In addition to reporting concerns, a Supplier is expected to cooperate with and assist Latham as it investigates the matter. A concern may be reported by any of the methods listed below. Anonymous reporting is available except where prohibited by local laws.

1. Contact your lead point of contact within the procurement group at Latham.
2. Contact Latham within the U.S. at +1 (518) 951-1000 and ask the operator to connect you to a member of the Legal Department. Our receptionist is available to direct calls Monday–Friday between 8:30 am and 5:00 pm eastern time.
3. Contact the Latham Ethics Hotline. The Latham Ethics Hotline is operated by a neutral, third-party provider and is a multilingual resource that may be used in all countries where Latham operates. It is available to receive reports 24 hours a day, 7 days a week and 365 days a year. The U.S. toll-free number for reporting a concern is +1 833 961 3635. For calls made outside the United States, Canada, Puerto Rico and other U.S. territories, please visit the website at www.lighthouse-services.com/lathampool.
4. Submit your concern via email to reports@lighthouse-services.com and identify Latham in the email.
5. Submit your concern via fax to +1 215 689 3885 and identify Latham in the fax.