

Effective Date:	October 4, 2023
Last Update:	October 4, 2023
Policy Owner:	Legal

Human Rights Policy

Policy & Purpose

We at Latham Group, Inc. (“Latham”) are committed not only to compliance with all laws and regulations that apply to our business activities, but also to the protection of, and respect, for human rights. We support the United Nations' Universal Declaration of Human Rights and endorse the principles of the United Nations Global Compact Initiative.

Promoting human rights standards throughout our organization and our business operations is aligned with our company values and our Code of Conduct and Business Ethics. We hold ourselves to high standards regarding human rights and expect our employees, contractors, and vendors to do so as well. This Policy is applicable to our employees. In addition, this Policy is applicable to our contractors and vendors through its incorporation into our Supplier Code of Conduct.

This Human Rights Policy has been adopted by Latham after review by our Executive Leadership Team^[1] and is made available for employees (as a part of Latham’s Employee Handbook and posted along with Latham’s other policies), customers (through posting on Latham’s website: www.LathamPool.com), and investors (through posting on Latham’s investor relations website: www.Ir.LathamPool.com).

Due Diligence

Latham ensures the effectiveness of this Policy by reviewing it annually and making changes as necessary. During the annual review, Latham conducts due diligence to ensure our business does not adversely affect human rights either directly or collaterally.

Employees - Working Conditions

We provide our employees with fair and competitive compensation and benefits. Our wages meet or exceed local market conditions and ensure an adequate standard of living for our employees and their families. All forms of forced and compulsory labor are strictly prohibited. Our compensation systems are linked to company and individual performance.

We encourage our employees to fully achieve their potential by offering ample training and education opportunities. Access to training and other career development measures is based on the principle of equal opportunity for all employees. We comply with all applicable laws and agreements on working time and paid leave. We respect the right to rest and leisure, including vacation with pay, and the right to family life, including parental leave and comparable provisions.

^[1] The Executive Leadership team is made up of the Chief Executive Officer, General Counsel, Chief Financial Officer, Chief Human Resources Officer, Chief Information Officer, Chief Operating Officer, and Chief Commercial Officer.



Health and Safety

We prioritize and set standards that meet applicable laws and regulations for the health and safety of our work force and for environmental protection and quality standards at our sites through the implementation of appropriate management systems. We must consistently apply these standards throughout our operations to minimize the occurrence of accidents and illnesses.

As Latham employees, our respect for people is mandatory for business excellence. We confirm our commitment to internationally recognized principles in the areas of human rights and labor conditions. We expect the conduct of our employees and business partners worldwide to reflect this commitment.

Harassment and Discrimination

Equal treatment of all employees is fundamental to our company values and our corporate conduct policies. No person is to be unfairly disadvantaged, favored, harassed, or ostracized because of ethnicity or race, color, gender, national origin, military or veteran status, mental or physical disability (including pregnancy-related conditions), sexual orientation, age, gender identity, gender expression, the status of being transgender, religion, creed, protected activity, genetic information, and/or any other classification protected by applicable federal, state or local law. Harassment of any kind is strictly prohibited.

Freedom of Association and Collective Bargaining

We are committed to an open and constructive dialogue with our employees. While we value our direct relationship with our employees, they are free to join organizations of their choice that represent them. These organizations may engage in collective bargaining according to applicable legal regulations.

Child Labor

We have a zero-tolerance policy regarding child labor in our business operations worldwide. We do not tolerate child labor in our supply chain and will take appropriate action against known violations. Our opposition to child labor is consistent with the International Labor Organization's core labor standards and the United Nations Global Compact principles.

Compliance

Anyone who believes a violation of this Policy has occurred is encouraged to report their concerns to their supervisor, manager, or a member of Human Resources. Additionally, employees and non-employees may report any concerns to Latham's Ethics Line by calling (800) 961-3635 or online at www.lighthouse-services.com/lathampool or by contacting Latham's General Counsel or Chief Human Resources Officer. Reports may be anonymous.

Latham is committed to remedying any negative human rights impact caused by Latham's operations. Upon receipt of any complaint, Latham will investigate and take appropriate action. Such action may include discipline or termination of any employee, contractor, customer, or vendor to the extent justified by the situation. The reporter may be informed of the outcome if they opt not to remain anonymous, but Latham will not be obligated to disclose any sensitive information regarding a business relationship, including employment.