



## **SUPPLIER CODE OF CONDUCT**

### **POLICY SUMMARY**

The POOLCORP Supplier Code of Conduct (“Supplier Code”) sets our expectations for our suppliers and their subcontractors to comply with all applicable laws and to embody the core values of our company in a sustainable manner. POOLCORP’s transparent core values of ethics, safety and health, and environmental stewardship reflect our expectations for the conduct of our corporation’s business, provide our employees with a nurturing environment within which growth is possible, and, most importantly, send our employees home safely every day. POOLCORP suppliers shall implement POOLCORP’s core values in the conduct of their business and shall respect the need to send their employees home safely day after day.

### **PURPOSE**

Our goal is for POOLCORP and its worldwide suppliers to be known, trusted, and respected amongst the best enterprises in the world. Our suppliers and their subcontractors are expected to uphold the human rights of workers, to treat them with dignity and respect, and to conduct responsible business with integrity, honesty, and transparency. The purpose of the Supplier Code is to provide general principles to follow to ensure that each of our suppliers acts responsibly and to promote compliance with applicable governmental law, rules, and regulations.

### **RESPONSIBILITY**

Obeying the law, both in letter and in spirit, is the foundation on which POOLCORP’s ethical standards are built. It is each supplier’s responsibility to know the treaties, laws, and regulations adopted in their respective countries, states or provinces, and communities applicable to their business. All our suppliers, their respective directors, officers, managers, and employees must respect and obey the applicable laws.

### **HUMAN RIGHTS – PROHIBITIONS ON SLAVERY AND HUMAN TRAFFICKING**

Respect for human rights is a fundamental building block for POOLCORP and suppliers that choose to work with POOLCORP are expected to embody the same principles. This Supplier Code was created to comply with the following guiding philosophies set forth by POOLCORP’s Human Rights Policy:

1. Respect for the individual regardless of nationality, race, sex, or anything that makes each human being unique.
2. Compliance with all laws, including all employment laws and regulations, in every country and jurisdiction in which our suppliers operate.
3. Respect for the environment to include the people within it in the jurisdictions in which our suppliers operate.
4. Social consciousness and full awareness that the countries in which people are born in and/or the parents to whom they are born to sometimes do not provide individuals the opportunities that others are so fortunate to have.
5. Acceptance that sending employees home safely every night is the most important aspect of all business practices and providing a safe work place together with ongoing training and awareness is paramount.



In tandem with the POOLCORP Human Rights Policy, compliance with this Supplier Code ensures that all workers involved with the manufacturing of POOLCORP products adhere to treaties, conventions, laws and regulations prohibiting human trafficking, slavery, bonded (including debt bondage) or indentured labor, forced labor, child labor, prison labor, non-payment of minimum wages, overtime pay, rest periods and holidays, and freedom of association. Suppliers shall adhere to the minimum employment age limit defined by national law or regulation and comply with relevant International Labor Organization standards.

## **HEALTH AND SAFETY**

POOLCORP understands that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production, and worker retention and morale. POOLCORP also recognizes that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. POOLCORP expects its suppliers to respect and obey health and safety requirements, including but not limited to use and care of occupational safety, emergency preparedness, security, risk information, occupational injury and illness, industrial chemical and biological control and protection, and safeguarding machinery use and production.

## **ENVIRONMENT AND SUSTAINABILITY**

POOLCORP realizes that environmental stewardship and sustainability are integral to distributing world-class products. Throughout the production of a supplier's products, the use of resources, product storage, waste disposal, and many other processes can cause adverse effects on the community, environment, and natural resources. These adverse effects shall be minimized by the supplier to safeguard the health and safety of its workers, the public, the flora, and the fauna. POOLCORP's environmental and sustainability goals that suppliers shall work towards includes the reduction of greenhouse gases and other harmful air emissions, the responsible management of water use in both quantity and quality, energy conservation, carbon minimization, resource efficiency to include the use of renewable resources, minimum and appropriately-handled waste to include wastewater, proper chemical management and storage, and environmental incident reporting.

## **ETHICS**

To meet social responsibilities and to achieve success in the marketplace, suppliers and their agents shall uphold the highest standards of ethics including but not limited to: business integrity, zero tolerance for bribery, corruption, extortion and embezzlement, undue or improper advantage, disclosure of confidential information, falsification of records or misrepresentation of conditions or practices in the supply chain, respect of intellectual property, fair business, advertising and competition standards, privacy of personal information of everyone they do business with, and no retaliation against personnel who raise or report concerns.



## **FOREIGN CORRUPT PRACTICES ACT**

The U.S. Foreign Corrupt Practices Act prohibits the giving of anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. Illegal payments to government officials of any country are strictly prohibited. In addition, the U.S. government has a number of laws and regulations restricting business gratuities which may be accepted by U.S. government personnel. The promise, offer, or delivery to an official of the U.S. government of a gift, favor or other gratuity is a violation of these rules and may not only violate company policy but may also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. POOLCORP expects full compliance by each of its suppliers with these laws.

## **FREE GIFT POLICY**

The purpose of business entertainment and gifts in a commercial setting is to create good will and to further working relationships. Suppliers are prohibited from providing or offering gifts, including gifts of cash or cash equivalents, that are excessive or that could inappropriately influence the POOLCORP's business decisions or gain an unfair advantage.

## **CONFLICT MINERALS**

The Office of Threat Finance Countermeasures, in conjunction with other State Department bureaus and U.S. agencies, actively works to sever the links between mineral resources and conflict through government-to-government diplomatic efforts. Legislation has been enacted requiring disclosure of the source of conflict minerals emanating from mining operations in the African Great Lakes Region that includes the Democratic Republic of the Congo, Tanzania, Zambia, Central African Republic, Angola, Uganda, Rwanda, South Sudan, Cameroon, Gabon, Kenya, and Burundi. The Dodd-Frank Wall Street Reform and Protection Act of 2010 (Dodd-Frank Act) applies not only to suppliers that manufacture products, but also to those companies that contract to manufacture products. Currently, conflict minerals are defined as tin (cassiterite), tantalum (coltan), gold, and tungsten (wolframite), as well as their derivatives. POOLCORP expects its suppliers not to engage in the sale or manufacture of components containing conflict minerals emanating from the covered countries under the Dodd-Frank Act.

## **MONITORING AND COMPLIANCE**

POOLCORP may periodically require a supplier to complete a questionnaire providing information about the supplier's compliance with this Supplier Code or treaties, conventions, laws and regulations, including those that prohibit human trafficking, slavery, bonded (including debt bondage) or indentured labor, forced labor, child labor, prison labor, mandating minimum wages, overtime pay, rest periods and holidays and freedom of association. Each supplier promises to promptly and accurately complete and return such questionnaire to POOLCORP and to provide such supplemental information thereafter as may be required by POOLCORP.

POOLCORP, directly or through designation of an independent firm, may conduct an audit of any supplier's compliance with this Supplier Code or treaties, conventions, laws and regulations, including those that prohibit human trafficking, slavery, bonded (including debt bondage) or indentured labor, forced labor, child labor, prison labor, mandating minimum wages, overtime pay, rest periods and holidays, and freedom of association. Supplier agrees to cooperate with any such audits, providing reasonable opportunities for POOLCORP, or its designated auditor, to examine personnel and wage records of the supplier, to tour the entire facility, and to conduct interviews of the supplier's managers and employees. Environmental management indicators include possession of the appropriate permits, proper waste management methods, safe chemical usage, and adequate wastewater treatment practices. The costs and expenses of such audits shall be borne exclusively by POOLCORP.



POOLCORP may send a notice of corrective actions required from a supplier with respect to potential violations of applicable laws and regulations revealed through the questionnaire, supplemental information, or through audits. The supplier shall have a reasonable opportunity to present further information to POOLCORP and to adopt corrective actions to remedy and to prevent potential violations of applicable laws and regulations.

Suppliers should report to POOLCORP any fact or circumstance which they know has resulted or will result in a violation of this Supplier Code. It is the policy of POOLCORP and our expectation of suppliers not to permit retaliation for a person's good faith report of questionable behavior and/or misconduct by another. Any supplier may direct questions or comments about this Supplier Code of Conduct or report any violations to his or her Supply Management representative, the Director of Sourcing, or any Vice President.

### **SUPPLIER'S ACKNOWLEDGEMENT**

On behalf of \_\_\_\_\_ (name of Supplier), I acknowledge that I have received, read, and understand the Supplier Code and the accept the obligation of my company, its directors, officers and employees to comply with the principles, policies and laws referred to in this Code. I am authorized to execute this acknowledgement and commitment to the Supplier Code on behalf of \_\_\_\_\_ (name of Supplier).

Supplier Name: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Printed Name: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_