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## Leslie's, Inc. Vendor Code of Conduct

Effective: May 2023

As the trusted leader in pool and spa care, we are committed to responsible business practices and establishing an ethical culture. As part of our corporate values, we promote high standards of integrity by conducting our affairs honestly and ethically. To this end, all Leslie's associates are expected to adhere to [Leslie's Code of Ethics](#), amongst other policies. We also expect our vendors, business partners, contractors, and third-party agents to comply with this Vendor Code of Conduct and maintain ethical standards in their business dealings and promote environmental and socially responsible best practices in their operations. Adherence with this Vendor Code of Conduct is a requirement for engaging in business with Leslie's. Leslie's vendors must abide by the following:

**Ethical Business Conduct/Conflicts of Interest:** Leslie's vendors are required to uphold high standards and expectations regarding ethics and business integrity. Leslie's vendors must also comply with all applicable Leslie's policies, federal, state, and local laws and regulations, including those related to manufacturing, packaging, testing, registration, and labeling, including, but not limited to, requirements under the Federal Insecticide, Fungicide, and Rodenticide Act, state pesticide laws, and the California Safe Drinking Water and Toxic Enforcement Act of 1986. Leslie's vendors must also avoid actual and perceived conflicts of interest in their dealings with Leslie's.

**Health and Safety:** Leslie's vendors and subcontractors are responsible for maintaining a safe and healthy workplace for their employees by following applicable workplace health and safety laws and regulations.

**Responsible Sourcing:** Leslie's vendors are required to be in full compliance with all applicable conflict minerals laws and responsible sourcing regulations, including, without limitation, Section 1502 of the Dodd-frank Wall Street Reform and Consumer Protection Act of 2010. Upon Leslie's request, vendors shall attest that no products furnished to Leslie's contain any conflict mineral (including, but not limited to tin, tantalum, gold, and tungsten) originating in the Democratic Republic of the Congo or an adjoining country and are ethically sourced.

**Human Trafficking and Forced or Child Labor:** Leslie's expects our vendors to share our commitment to respecting the human rights of workers throughout our supply chain and treating them with dignity and respect. Vendors and suppliers are also required to maintain fundamental and high ethical, labor, and human rights standards. Leslie's vendors will not engage in trafficking of persons and ensure that products are not produced, manufactured, assembled, or packaged using forced labor, modern slavery, or child labor, additionally all vendors will be in compliance with the Uyghur Forced Labor Prevention Act of 2021 and all other forced labor or child labor laws and regulations.

**Anti-Corruption & Bribery:** Leslie's vendors will observe [Leslie's Foreign Corrupt Practices Act Compliance Policy](#) and comply in all respects with anti-corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act of 1977.

**Global Trade Compliance:** Leslie's vendors will comply with all export control and import laws and regulations that govern the exportation and importation of product, including items that are hand-

carried as samples. In addition, vendors will comply with all laws that prohibit dealings with sanctioned individuals and entities and activities associated with organized foreign economic boycotts, including refusing to do business with boycotted countries, their nationals, or banned companies.

**Gifts and Entertainment:** Leslie's vendors may not provide or offer any gifts, entertainment, or anything else of monetary value to influence or obtain preferential treatment in contractual or other business dealings. All gifts and entertainment provided or offered by Vendor must adhere to Leslie's Code of Ethics and anticorruption laws and regulations. Leslie's associates may accept meals, refreshments, entertainment, and non-solicited promotional materials of nominal intrinsic value.

**Inclusion & Equity:** Leslie's vendors are encouraged to foster an inclusive culture that embraces workforce diversity and make reasonable efforts to engage small businesses and diverse business enterprises including minority-owned businesses, women-owned businesses, LGBTQ+ owned businesses, and disabled-owned businesses in their general business operations.

**Sustainable Business Practices:** Leslie's vendors are encouraged to operate in an environmentally responsible manner through environmental management, responsible natural resource use, and will comply with all environmental laws and regulations.

**Harassment:** Leslie's vendors are prohibited from engaging in and tolerating harassment and violence in the workplace. Conduct that creates an unwelcome or uncomfortable situation or hostile work environment, such as unwelcome advances or sexual requests, inappropriate comments, jokes, intimidation, bullying, or physical contact, may be forms of workplace harassment.

**Discrimination:** Leslie's vendors are prohibited from discriminating against any employee or person with whom they work or do business with on the basis of age, race, color, religion, sex, disability, national origin, sexual orientation, gender identity or expression, covered veteran or other legally protected status.

**Data Privacy and Security:** Leslie's vendors will implement appropriate safeguard measures and security controls to protect and secure personal information and company proprietary data in accordance with applicable data privacy, data security, and physical security laws, regulations, and standards.

**Recordkeeping:** Leslie's vendors are required to maintain honest and accurate recording and reporting of information to make responsible business decisions. This includes such data as quality, safety, and personnel records, as well as all financial records.

**Reporting Concerns & Grievances:** Leslie's vendors and subcontractors are encouraged to report violations through the Leslie's EthicsLine. The Leslie's EthicsLine is accessible to all vendors 24 hours a day, 7 days a week and is available for reporting suspected violations of laws, regulations, policies, or the Vendor Code of Conduct. The EthicsLine may be reached at 1-800-826-6762. Retaliation against any vendor or subcontractor who reports a good faith concern to Leslie's about illegal or unethical conduct will not be tolerated. Leslie's is committed to fostering an environment where vendors can report concerns without fear of retaliation.

**Vendor Code of Conduct Violation:** Failure to comply with this Vendor Code of Conduct may result in termination as a Leslie's vendor.