

CODE OF ETHICS

LESLIE'S, INC.

Effective: November 2024

The Board of Directors (the "Board") of Leslie's, Inc. (together with its subsidiaries, the "Company") has adopted this Code of Ethics (the "Code") in order to deter wrongdoing and promote:

1. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
2. full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the "SEC") and in other public communications made by the Company;
3. compliance with applicable governmental laws, rules and regulations;
4. the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and
5. accountability for adherence to the Code.

All directors, officers and employees are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below.

HONEST AND ETHICAL CONDUCT

The Company's policy is to promote high standards of integrity by conducting its affairs honestly and ethically.

Each director, officer and employee must act with integrity and observe the highest ethical standards of business conduct in his or her dealings with the Company's customers, vendors, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job.

The Company also expects its vendors, service providers, and other business partners to act with integrity and a commitment to ethical business conduct. For more information, see the Leslie's, Inc. Vendor Code of Conduct.

CONFLICTS OF INTEREST AND RELATED PARTIES

A conflict of interest occurs when an individual's private interest interferes, or even appears to interfere, with the interests of the Company as a whole. A conflict of interest can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform his or her work for the Company objectively and effectively. Conflicts of interest also arise when an employee, officer or director (or a member of his or her family) receives improper personal

benefits as a result of his or her position in the Company. Conflicts of interest present a particular risk in connection with Company transactions with related parties.

Examples of conflicts of interest may include: (i) improperly using Company resources, property, information or position for personal gain; (ii) self-dealing by an individual, such as steering Company business or opportunities to benefit the individual or his or her family members; (iii) owning all or part of a business that is a counterparty of the Company or competes with the Company's sales or procurement activity; or (iv) conducting non-Company business in such a manner as to mislead others into believing that the individual is representing the Company. In addition, individuals should carefully consider close personal relationships with fellow employees, third-party agents, customers or vendors that could be perceived to create a conflict of interest, particularly when one of them has the ability to influence employment-related decisions about the other, or where the relationship could interfere with the individual's ability to make sound, objective business decisions.

Loans by the Company to, or guarantees by the Company of, obligations of directors, officers, employees or their family members are of special concern. Loans by the Company to, or guarantees by the Company of, obligations of any director or executive officer are expressly prohibited. Individuals should note that borrowing money from, lending money to or soliciting donations from a customer or vendor of the Company (other than bank loans offered on terms consistent with those offered to the general market) may also constitute a potential conflict of interest, and should generally be avoided.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described in the paragraph below.

Persons other than directors and executive officers who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should discuss the matter with, and seek a determination and prior authorization or approval from, their supervisor or the General Counsel. A supervisor may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the General Counsel with a written description of the activity and seeking the General Counsel's written approval. If the supervisor is himself involved in the potential or actual conflict, the matter should instead be discussed directly with the General Counsel.

Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee.

In addition, the Company has adopted a Related Party Transaction Policy governing transactions with related parties. It is a violation of this Code for any individual to (i) circumvent that policy, or (ii) fail to cooperate with or provide incomplete or misleading information in connection with the Company's process to identify a related party or to assess a transaction pursuant to that policy.

CORPORATE OPPORTUNITIES

All directors, officers and employees owe a duty to the Company to advance its interests when the opportunity to do so arises. Directors, officers and employees are prohibited from taking for themselves personally opportunities that are discovered through the use of Company property, information or position. Directors, officers and employees may not use Company property, information or position for personal gain. In addition, no director, officer or employee may compete with the Company.

CONFIDENTIALITY

Directors, officers and employees should maintain the confidentiality of information entrusted to them by the Company or by its customers, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information that might be of use to the Company's competitors, or harmful to the Company or its customers if disclosed.

Nothing in this Code prohibits directors, officers or employees from reporting suspected violations of law to the Securities and Exchange Commission or another relevant governmental agency or otherwise making disclosures protected under reporting and whistleblower laws, or from cooperating in a government agency's investigation.

ANTITRUST AND COMPETITION

The Company believes in fair and open competition and adheres strictly to applicable antitrust laws. As a general matter, any contact with a competitor may be problematic under antitrust laws. Competition and antitrust laws impose severe penalties for certain types of violations, including criminal or administrative penalties and potentially substantial fines and damages. Competition law violations may also result in significant harm to the Company's reputation and ability to do business as well as impede the validity and enforceability of the Company's contracts.

FAIR DEALING

Each director, officer and employee should endeavor to deal fairly with the Company's customers, vendors, competitors and employees. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practice.

ANTI-BRIBERY AND ANTI-CORRUPTION

The Company strictly prohibits all forms of corruption and bribery and will take all necessary steps to ensure that corruption and bribery do not occur in its business activities. For more information, see the Leslie's, Inc. Foreign Corrupt Practices Act Compliance Policy.

ENTERTAINMENT AND GIFTS

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and to further working relationships. Any gift that is excessive and has the potential to unduly

influence judgment should not be given or accepted. Gifts from vendors or customers should not be solicited. Moreover, gifts of cash or cash equivalents are prohibited. Any gift with a market value of \$100 or more must not be accepted without prior approval. For more information, see the Leslie's, Inc. Gifts & Gratuities Policy.

PRIVACY, COMMUNICATIONS AND SOCIAL MEDIA

The Company is committed to respecting the privacy rights of individuals and to complying with applicable privacy and data protection laws. It is the Company's policy to be transparent about the use of personal information and to treat such information in accordance with the Leslie's Inc. Privacy Policy and applicable data protection laws.

Directors, officers and employees should not expect a right to privacy on Company equipment or networks. All communications, e-mails or Internet use on Company equipment or networks, including for occasional personal use, may be subject to monitoring by the Company to the extent permissible and in accordance with applicable laws for legitimate business purposes. Communications related to the Company's business should only occur over approved channels.

Directors, officers and employees should be responsible in their use of social media, and are expected to use social media in a way that does not conflict with the Company's values. When posting about the Company, directors, officers and employees should avoid representing their personal views as those of the Company, should avoid activity that may negatively affect the Company, and should not post information about colleagues without their consent.

POLITICAL CONTRIBUTIONS AND ACTIVITY

The Company encourages directors, officers and employees to be civically engaged on their personal time. However, the Company does not make political contributions to individual candidates, political parties, political action committees or similar organizations; and directors, officers and employees may not use Company funds or resources to engage in political activity. For more information, see the Leslie's, Inc. Policy on Political Contributions and Lobbying Activities.

HUMAN RIGHTS

The Company is committed to upholding and respecting human rights in its operations, products and supply chain and recognizes the United Nations Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights. For more information, see the Leslie's, Inc. Human Rights Policy.

The Company expects its vendors to maintain fundamental and high ethical, labor and human rights standards. Vendors must ensure that products are produced without the use of forced labor, prison labor, child labor or human trafficking. The Company expects all its vendors to abide by the standards set forth in the Leslie's Vendor Code of Conduct.

DISCRIMINATION AND HARASSMENT

The Company provides equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. The Company prohibits discrimination against any candidate or employee based on any legally protected class or characteristic pursuant to applicable law, including, but not limited to: race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), sexual orientation, gender identity, age, national origin or ancestry, citizenship status, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status or any other status protected by federal, state or local law. For more information, see the Leslie's, Inc. Human Rights Policy.

HEALTH, SAFETY AND ENVIRONMENTAL

The Company strives to provide a safe and healthy work environment. Directors, officers and employees must follow applicable safety and health rules and practices and report accidents, injuries, unsafe equipment and any other unsafe practices or conditions. For more information, see the Leslie's, Inc. Human Rights Policy. Further, misusing controlled substances or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs on the job is absolutely prohibited.

The Company considers the environment in its business activities, including product manufacturing, distribution and sales. For more information, see Leslie's, Inc. Environmental Policy.

PROTECTION AND PROPER USE OF COMPANY ASSETS

All directors, officers and employees should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability and are prohibited.

All Company assets should be used only for legitimate business purposes. Any suspected incident of fraud or theft should be reported for investigation immediately, in accordance with the reporting procedure set forth below.

The obligation to protect Company assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any non-public financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

COMPLIANCE

Directors, officers and employees should comply, both in letter and spirit, with all applicable laws, rules and regulations of the United States and in the cities and states in which the Company operates.

Although not all directors, officers and employees are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek

advice from appropriate personnel. Questions about compliance should be addressed to the Legal Department.

INSIDER TRADING

Trading in the Company's stock – or the stock of the Company's current customers, vendors or other suppliers, preexisting or prospective contract counterparties and other business partners – while aware of material nonpublic information is unethical, illegal and a violation of the Company's Insider Trading Policy.

The Insider Trading Policy provides that no Company director, officer or employee (each, an "insider"), who, as a result of such person's employment or other relationship with the Company, is aware of material nonpublic information about the Company or one of its business partners, may (1) trade in such company's securities, (2) recommend the purchase or sale of such company's securities, (3) disclose such information to persons within the Company whose jobs do not require them to have that information, or outside of the Company to other persons or (4) assist anyone engaged in the above activities. These rules also apply to any family members or others who reside with an insider (or whose transactions are influenced by the insider), as well as any entities that an insider influences or controls.

Information is considered "material" if a reasonable investor would consider that information important in making a decision to buy, hold or sell securities, and information that has not been disclosed to the public is generally considered to be nonpublic information. In addition, the Insider Trading Policy prohibits short-term trading, short sales, transactions in put options, call options or other derivative securities and hedging and pledging transactions.

For more information, including with respect to quarterly "blackout" periods and applicable trading pre-approval requirements, please refer to the Leslie's Inc. Insider Trading Policy.

DISCLOSURE

The Company's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

Each director, officer and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained. Each director, officer and employee must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

Each director, officer and employee who is involved in the Company's disclosure process must:

1. be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and

2. take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

Individuals should not disclose material nonpublic information about the Company to persons outside the Company unless they are specifically authorized to do so. The Company has designated spokespeople authorized to speak on behalf of the Company, and Company employees should refer any inquiries from the media, shareholders, investment advisers, financial analysts or others enumerated in the Company's Regulation FD Policy to the head representative of the Investor Relations department. External speaking or communications on the Company's behalf or done using the Company's name generally require prior approval.

For more information, see the Leslie's Inc. Regulation FD Policy.

REPORTING AND INVESTIGATION OF VIOLATIONS

Actions prohibited by this Code involving directors or executive officers must be reported to the Audit Committee.

Actions prohibited by this Code involving anyone other than a director or executive officer must be reported to the reporting person's supervisor, the General Counsel or the Ethics Line at 800-826-6762. All reports are treated as confidentially as possible.

After receiving a report of an alleged prohibited action, the Audit Committee, the General Counsel or the relevant supervisor must promptly take all appropriate actions necessary to investigate.

All directors, officers and employees are expected to cooperate in any internal investigation of misconduct.

PROHIBITION ON RETALIATION

The Company does not tolerate acts of retaliation against any director, officer or employee who makes a good faith report of known or suspected acts of misconduct or other violations of this Code, or who cooperates in any investigation thereof, and any such retaliation may be a violation of the Company's Whistleblower Policy.

ENFORCEMENT

The Company must ensure prompt and consistent action against violations of this Code.

If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board.

If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor determines that a violation of this Code has occurred, the supervisor will report such determination to the General Counsel.

Upon receipt of a determination that there has been a violation of this Code, the Board or the General Counsel will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

Violations of this Code will result in disciplinary action, up to and including termination of employment.

WAIVERS AND AMENDMENTS

The Board or the Audit Committee (in the case of a violation by a director or executive officer) or the General Counsel (in the case of a violation by any other person) may, in its discretion, waive any violation of this Code.

Any waiver for a director or an executive officer shall be disclosed as required by SEC and NASDAQ rules.