

Leslie's, Inc. Human Rights Policy

Effective Date: March 2024

Leslie's mission is to deliver unparalleled expertise, service, and innovative solutions. Our [Code of Ethics](#) sets the foundation of good business conduct. We must treat each other with dignity, respect and fairness and value the unique character and contribution of each associate.

Therefore, we are committed to upholding and respecting human rights in our operations, products, and supply chain and recognize the United Nations Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights. This policy applies to our team members, vendors, business partners, contractors, and third-party agents.

Guiding Principles:

- **Non-discrimination:** We prohibit discrimination against any candidate or associate based on any legally-recognized basis, 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.
- **Supply Chain Responsibility:** We expect our 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, or child labor and human trafficking. We also comply with the [California Transparency in Supply Chains Act](#) and the requirements of the Securities and Exchange Commission, including those regarding annual product reviews for conflict minerals and related reporting. We expect all our vendors to abide by the standards set forth in the [Leslie's Vendor Code of Conduct](#).
- **Data Privacy:** Protecting customer data and respecting our customers' right to privacy is essential to maintaining a loyal and trusting relationship. Our data privacy guidelines are set forth in the [Leslie's Privacy Policy](#). We also respect the right to privacy of our associates and comply with all applicable data privacy laws and regulations relating to their data.
- **Child Labor and Forced Labor:** We do not and will not employ child labor or forced labor. Child labor is defined as anyone under the age of sixteen. If any local law is more restrictive than our policy, we will comply with the local law. If the local law is less restrictive, we will continue to follow our policy of not employing anyone under the age of sixteen. Forced labor is defined as anyone who is compelled to provide service or work through coercion, fraud, or the use of force.
- **Health and Safety:** Providing a safe shopping experience for our customers and a safe and healthy workplace for our associates is our highest operational priority.
- **Work Hours & Wages:** Our commitment to fair and equitable compensation is central to attracting and retaining our valuable workforce. We conduct regular compensation studies including benchmarking against regional retail labor markets and regularly perform internal pay equity assessments. This ensures that our associates are compensated fairly, regardless of

ethnicity, race, gender, or any other protected status. Our employment practices adhere to all relevant laws and regulations, covering areas such as wages, work hours, and benefits, demonstrating our organization-wide commitment to fairness and compliance.

- **Working conditions:** We strive to provide a work environment free from unlawful harassment and do not tolerate bullying behavior. Workplace bullying is the use of force, threats or coercion to abuse, intimidate, or humiliate another associate. Cyberbullying refers to bullying, as previously defined that occurs through the use of a computer, cell phone, smartphone, tablet, pager or other device that transmits electronic information, regardless of whether the device is owned by or located at one of our locations or connected to our network. Cyberbullying is also prohibited. Our anti-harassment policy includes robust mechanisms to report and investigate events, holding accountable those in violation of our policies and protecting against any form of retaliation.
- **Inclusive Environment:** Leslie's is a place where everyone is welcome. Key aspects of this commitment are valuing ideas from multiple viewpoints, knowing that our ultimate success is directly linked to having talented associates from all backgrounds and perspectives, and developing, fostering, and celebrating a culture of Diversity, Equity & Inclusion.
- **Environmental Sustainability:** We are committed to exploring ways to reduce our environmental footprint. We consider the environment in our business activities, including product manufacturing, distribution, and sales.

Reporting Channel

Our associates, vendors, customers, and community members can report human rights concerns through the Leslie's EthicsLine. The Leslie's EthicsLine is accessible to all stakeholders 24 hours a day, 7 days a week and is available for reporting suspected violations of laws, regulations, policies, Leslie's [Code of Ethics](#) or the Human Rights Policy. The EthicsLine may be reached at **1-800-826-6762**.

Summary

We believe that our success is intrinsically tied to the well-being and rights of people in our operations, supply chain, and local communities where we operate. We are dedicated to respecting and promoting human rights, and we will continue to strive for excellence in our operations while upholding the principles outlined in this policy.