

# MODERN SLAVERY ACT TRANSPARENCY STATEMENT

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This statement is made in accordance with the requirements of the Modern Slavery Act 2015 ('The Act') as they apply to The Gym Group plc, The Gym Limited and all entities in The Gym Group plc group ('The Group' or 'The Gym Group'). The full list of entities, and more information on the Group, is in our Annual Report which is available on our website [www.tggplc.com](http://www.tggplc.com).

The Gym Group is committed to compliance with the provisions of the Act. As such, the Group has a zero-tolerance approach to modern slavery and we are further committed to acting ethically, transparently and with integrity in all of our business dealings and relationships.

## Our business and structure, and supply chains

The Gym Group is a leading provider of low cost, high quality gyms that are open 24/7. The Group has over 2000 employees and is based in the UK. Our staffing model means that our gyms are managed by our own employees, supported by outsourced providers for services such as maintenance and cleaning.

As such, we consider that the principal areas in which the Group faces risks related to slavery include:

- The Gym Group supply chain;
- Outsourced providers; and
- People working in our gyms and in other functions.

## Managing risks related to slavery

The Group assesses and manages risk in the above areas as follows:

### SUPPLY CHAIN AND OUTSOURCED PROVIDERS

High standards of ethics and business conduct is important in being a responsible part of the communities in which we operate. The majority of our suppliers are located in the UK, which the Board considers to be lower risk as they are required to comply with the Act and other related legislation.

We operate competitive tender processes for significant contracts, and consider the reputation of suppliers as part of this process. We inform our suppliers that we are not prepared to accept any form of exploitation in their business or any part of their supply chain by publishing our Modern Slavery statement on our website.

We are looking to strengthen our procedures in this area over time, by updating our procurement policies and processes.

## **PEOPLE WORKING IN OUR GYMS AND OTHER FUNCTIONS**

In our recruitment processes we take the following actions:

1. We ensure all of our employees have a written contract of employment;
2. We ensure employees are legally entitled to work in the UK; and
3. We provide information to all new employees regarding their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

In 2019, we rolled out a new operating model for personal trainers, New Gym Team (NGT), and all our gyms are on the common operating model. We have approx. 1,600 part-time employees who work for us 12 hours a week and outside of these hours run their self-employed personal trainer business in our gyms for which they pay us a rent ('Fitness Trainers'). Our Fitness Trainers have the same employment rights as all other employees and are supported in the same way by our People Team.

Our self-employed personal trainers enter into written service agreements and it is verified that they are appropriately qualified and hold appropriate insurance with a reputable insurance firm.

## **Policies in relation to slavery and human trafficking**

We have a suite of employee policies intended to support a safe working environment, including whistleblowing and protecting young workers.

We are working to implement a formal policy regarding slavery and human trafficking which will be shared with all employees. We will also review requirements for training or employee guidance in these areas.

In early 2020, as part of a raft of measures to support our employees during covid-19 disruption, we accelerated the rollout of a new communications platform which facilitates communication with all our workforce and will enable us to ensure policies and guidance are clearly and promptly

shared with all who need them. We are also due to launch a Learning Management System, which will give us the ability to host, share and mandate workplace learning for all employees which will support us in ensuring that training and guidance is given to those who require it.

This statement was approved by the Board of The Gym Group plc on 29 June 2020.



Mark George  
Chief Financial Officer  
The Gym Group plc