

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

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.

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 and commitment to operating a sustainable business 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 actively manage our supplier relationships and have worked with our major suppliers through the COVID-19 pandemic to minimise costs and disruption.

As part of our formal risk review process, particularly in light of the COVID-19 pandemic, we consider the risk of supplier failure in relation to business interruption and potential reputational risk. As outlined in our Annual Report for 2020, a detailed exercise is being undertaken to assess each of the sources of business interruption risk and determine where appropriate action can be taken to mitigate it.

PEOPLE WORKING IN OUR GYMS AND OTHER FUNCTIONS

As part of our commitment to our employees, we take the following actions:

- We ensure all of our employees have a written contract of employment;
- We ensure employees are legally entitled to work in the UK; and
- 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.

We operate a common employment model for our employees across our sites, which was embedded in 2019. The “New Gym Team” (NGT) employment model means that we have approx. 1,600 part-time Fitness Trainer (FT) employees who work for us for 12 hours per week and outside of these hours run their self-employed Personal Trainer (PT) business in our gyms for which they pay us rent. Our Fitness Trainers have the same employment rights as all other employees and are supported in the same way by our People Team. The advantages of this model ensured we could support our teams during periods of COVID-related closure, both by making use of the furlough scheme, and communicating with our FTs effectively using our employee communications platform and our Learning Management System.

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. Summaries of some of our policies, such as our

Human Rights Policy Statement, can be found on the Sustainability section of our website <https://www.tggplc.com/sustainability/policy-statements>. While we are satisfied that we have appropriate working practices and policies in place, we are reviewing implementation of 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. We are carrying out a thorough review of our procurement governance, including policies and related procedures, with the objective of strengthening our processes in this area over time.

In 2020, as part of a raft of measures to support our employees during the COVID-19 disruption, we accelerated the rollout of a new platform which facilitates communication with all our workforce, enabling us to ensure policies and guidance are clearly and promptly shared with all who need them. We further rolled out a Learning Management System, giving 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 2021.



Mark George
Chief Financial Officer
The Gym Group plc