

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.

Organisation 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.

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 describe the risk management and arrangements in place below.

Managing risks related to slavery

The Group assesses and manages risk in these areas as follows:

SUPPLY CHAIN RISK ASSESSMENT AND MANAGEMENT

As part of our formal risk review process, particularly in light of the COVID-19 pandemic and emerging supply chain and cost of living challenges in the UK, we consider the risk of supplier failure in relation to business interruption and potential reputational risk. As outlined in our Annual Report for 2021, a review

of all key suppliers has been undertaken and plans are being put in place to mitigate critical supplier failure.

Our annual risk assessment identified emerging risks from relationships with key suppliers as well as sustainability. We actively work with our suppliers, including as a result of the COVID 19 pandemic, to understand the significant issues which matter to them and minimise disruption. We consider the supply chain to be an important part of business sustainability, and during the year we undertook an extensive carbon audit of our operations and supply chain to establish a 2019 baseline carbon footprint leading to the launch of our Net-Zero commitment. We also included suppliers as a key stakeholder as part of our sustainability materiality assessment.

OUTSOURCED PROVIDERS

Our contracts and relationships with critical suppliers must be well monitored, value for money and regularly reviewed. In addition, third parties must comply with appropriate regulatory and ethical standards. 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.

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;
- 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; and
- We communicate with our employees regularly and make available appropriate training and policies relevant to their roles.

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 and our arrangements ensure we can support our teams during periods of disruption, such as during COVID-related closures by making use of the furlough scheme, and communicating with our FTs effectively.

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 a safe working environment

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>. During the year, we reviewed and refreshed some of our employee-facing policies, such as Whistleblowing Policy, Anti-Bribery Policy and Expenses Policy, which are available on our intranet and summarised on our website. We are satisfied that we have appropriate working practices and policies in place, and we also review requirements for training or employee guidance in these areas on an ongoing basis. We are in the process of strengthening our procurement team with additional resource and continue to review our procurement policy and related procedures, with the objective of strengthening our processes in this area over time.

We continue to use our communications platform launched in 2020 to ensure policies, guidance and training are clearly and promptly shared with all who need them and proactively engage with our employees as we emerge from the pandemic. We use a Learning Management System 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. The Learning Management System enables us to monitor completion rates and encourage participation where required.

This statement was approved by the Board of The Gym Group plc on 29 July 2022.

Richard Darwin
Chief Executive Officer
The Gym Group plc