

# whistleblowing policy

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## contents

- 1. INTRODUCTION PURPOSE ..... 2
- 2. SCOPE..... 2
- 3. PROCEDURE FOR RAISING CONCERN ..... 2
- 4. PRINCIPLES..... 3
- 5. ANONYMITY ..... 3

## 1. INTRODUCTION PURPOSE

At the Gym Group (“TGG”, “us” or “we”), we are committed to conducting our business ethically, with honesty and integrity, and will comply with the law in each country in which we do business. These are the standards we expect from all of our employees and officers.

However, we acknowledge that things do go wrong from time to time, but by adopting a culture of openness and accountability, we can prevent breaches of those standards and remedy failings when they occur.

We therefore encourage anyone to report any information in relation to any serious malpractice or misconduct of which they become aware while working for us.

## 2. SCOPE

This Whistleblowing Policy applies to all employees within TGG, and includes suspected wrongdoing in relation to (list not exhaustive):

- Criminal activity
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Bribery
- Financial fraud or mismanagement
- Breach of our internal policies and procedures
- Conduct likely to damage our reputation or financial wellbeing
- The deliberate concealment of any of the above

## 3. PROCEDURE FOR RAISING CONCERN

We hope that any concerns can be raised with your line manager in the first instance. However, if that is not possible, or the matter is more serious, then employees should raise their concerns in writing by clicking this link [here](#); this will be sent to the Company Secretary.

This link is also available on [CORE](#).

All reports will be handled by the Company Secretary in the first instance, with escalation and use of experts as appropriate.

If you have made a disclosure as outlined above and you are not satisfied with the investigation or its conclusion, you should write directly to the Chief Executive.

If you are unsure whether you should use the whistleblowing channel or have any other question regarding whistleblowing, please direct your enquiry to your line manager or email to [company.secretary@thegymgroup.com](mailto:company.secretary@thegymgroup.com)

## 4. PRINCIPLES

Any issue raised under this policy will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation will be confirmed in writing to you as far as is appropriate.

Although your confidentiality will be protected during the course of any enquiries made in relation to your disclosure, it may be necessary to disclose your identity to certain parties (for example, if we need to report the issue to the police).

You will not be disadvantaged for raising a matter under this policy. This means that your continued employment and opportunities for future promotion or training will not be prejudiced because you have raised a legitimate concern. Maliciously making a false allegation would constitute a disciplinary offence, however.

An instruction to cover up wrongdoing is also a disciplinary offence. If you are told not to raise or pursue any concern, even by a person in authority such as a manager, you should not remain silent and should report the matter via the Whistleblowing email address noted above.

This policy is for disclosures about matters other than a breach of an employee's own contract of employment. If you are concerned that your own contract has been, or is likely to be, breached, you should use the Company's grievance procedure.

## 5. ANONYMITY

You can choose to make your claim [here](#) and selecting the option to remain anonymous. If you raise your whistleblowing concern anonymously, we undertake to investigate it. However, it may be more difficult for us to assess and investigate your concern effectively and to communicate with you.