

Responsible Marketing Policy

Introduction

The Gym Group's founding mission is to break down barriers to fitness and our core values drive our commitment to being a responsible business. Marketing helps us to inform and inspire people about the benefits of our products, communicate the positive impact we have on the communities we operate in, and engage with our valued members.

Our Responsible Marketing Policy has been created to provide a framework to guide our day-to-day marketing behaviours, as well as to ensure we have a consistent and responsible approach to our brand communications. In addition to compliance with UK laws and regulations, we require our colleagues to follow these guidelines, as well as our supplier partners, agencies and anyone acting on our behalf.

We will regularly review our marketing communications to ensure they are aligned with these principles and to promote industry best practices.

Scope

These guidelines apply to all marketing communications generated by or on behalf of The Gym Group. Within this, 'marketing' means product advertising and promotion across all media including (but not limited to) brand promotions, brand advertising, brand PR, sponsorship and experiential, marketing collateral, digital, online and mobile marketing, as well as social media.

Core Principles

We commit that our marketing communications will always be honest, transparent, and respectful. Above this we also commit to the following principles;

- Never mislead customers or our members
- Be legal, ethical, and conform to accepted principles of decency, fair competition, and good business practice
- Avoid promoting themes associated with aggression, anti-social behaviour, or violence
- Avoid any derogatory, defamatory, or offensive statements or imagery in particular in relation to race, gender, sexual orientation, religion and political views
- We will seek to be fully inclusive, ensuring that we represent the diversity of our members and teams
- Seek to prevent any unsolicited marketing that uses The Gym Group brand without authorisation

- Never knowingly advertise in media or on websites that contain extremist views or explicit content
- Endeavour only to advertise to audiences +16 years' old (as this is the minimum age required to access our gyms)
- Consistently promote a healthier lifestyle as part of our commitment to providing accessible and affordable fitness, supporting our members' physical and mental wellbeing
- Promote our responsibility to people and the environment, as part of The Gym Group's Sustainability Strategy; this also applies to developing sustainable marketing practices in production and execution of collateral or other marketing activities
- Carefully review any formal partnerships or associations with third party brands or companies to ensure they adhere to our responsible business practices
- Comply with all UK legislative and regulatory requirements. All our communications will work within the framework of The UK Code of Broadcast Advertising (BCAP Code) and the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code).

Compliance

Our values and policy will be included in our marketing team's onboarding tools, as well as for key agency personnel. These principles extend across all marketing collateral, and marketing teams will be responsible for reviewing content which has an external facing audience (for example recruitment material), as well as internal brand communications.

Responsibility and Management

This policy is owned by the Chief Marketing Officer.

All marketing teams must be briefed on the policy, together with all external partners and agencies who either develop or deploy communications on our behalf. Awareness of the policy will also be cascaded and shared as best practice across the organisation.

This policy will be reviewed on an annual basis to ensure that it is in line with all relevant regulations and meets the highest standards of our responsible business practices.

November 2022