



The Gym Limited

Supplier Code of Conduct

Classification – Confidential
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Introduction

Founded in 2007, The Gym Group (TGG) is the original provider of high-quality, low-cost gym facilities in the UK. We offer 24/7, no contract gym memberships delivering great value-for money for all our members.

The Gym Group is committed to conducting business in an ethical and honest manner. We believe that strong supplier partnerships ensure that we source the best value goods and services for the benefit of our members and the business. High standards and integrity of ethics and business conduct is an important component of being a responsible business and are a fundamental requirement of our supply chain.

The Supplier Code of Conduct is designed to enable you, our suppliers and contractors (“Suppliers”) to better understand our organisation as well as our commitment to responsible procurement practices. It sets out the minimum standards we require in order to be able to work with a prospective supplier or contractor. This Code has been produced in line with relevant international best practice, including the UN’s Guiding Principles on Business and Human Rights and the UN Global Compact. Our suppliers should share the same values and must meet the guidelines within this document.

Required Conduct

Compliance with the Code of Conduct

Existing and prospective suppliers must be able to demonstrate compliance with this Supplier Code of Conduct and the details laid out within. This Code of Conduct applies to all suppliers regardless of which country they operate from.

Laws and Regulations

Suppliers must comply with all applicable local and national laws, including taxation, rules and regulations in relation to the products and services that they supply to TGG. All suppliers and subcontractors supplying goods and services to TGG that involve transboundary travel must also comply with any relevant international laws, regulations and treaties.

Environment

TGG takes a proactive, strategic approach to environmental management and strives to be at the forefront of best practice within the health and fitness industry.

Suppliers should have procedures in place to measure environmental impacts associated directly, or indirectly, with the products or services that they provide. Suppliers should be able to provide their environmental policy upon request and demonstrate a proactive, strategic approach to reducing their environmental impact. TGG would expect the policy to include details on how the supplier intends to reduce its carbon footprint, water consumption and waste and minimise the environmental impact of their operations. A copy of our [Environmental Policy](#) can be found by clicking on the link.

Modern Slavery

We recognise the risks of modern slavery and take active steps to assess and manage them. We comply with the Modern Slavery Act (2015) and our statement, including further information on our activity to mitigate risks related to [modern slavery](#), can be found by clicking on the link.

We expect our suppliers and contractors to:

- prohibit any form of forced, involuntary or debt-bonded labour (e.g., slavery, or human trafficking)
- prohibit the employment of workers under the legal minimum age for work as stipulated by the local employment laws for your relevant jurisdiction.
- monitor their own supply chains, and where they believe there is a risk of modern slavery within it, report this to the relevant authorities.
- disclose, to TGG, any incidents of modern slavery and human trafficking that have occurred within the supply chain, and
- agree to be subject to site visits and assessments from TGG's teams (notice of 30 days to be provided).

Anti-bribery and corruption

TGG is committed to conducting business in an ethical and honest manner and to implementing and enforcing systems that ensure bribery is prevented. TGG has a zero-tolerance approach to bribery.

We expect our suppliers to adhere in full with our [Anti-Bribery Policy](#) which can be found by clicking on the link.

Data Security and Privacy

Suppliers should ensure compliance with laws and directives providing for the protection, transfer, access and storage of personal data. This is in accordance with the Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR). We are committed to safeguarding personal data against loss and unauthorised use, securely managing and processing data related to TGG's operations, and managing TGG's intellectual property and confidential information for the intended purposes of use in accordance with the reasonable directions provided by TGG.

Fair and Decent Pay

Suppliers must meet the legal requirements and industry standards for fair employment including the provision of an employment contract outlining fair employment rights and working hours, national minimum wage and other benefits related to remuneration.

Discrimination

We are committed to providing a safe and inclusive environment at The Gym Group where people are treated with dignity and respect. Under no circumstances should employees of a supplier be treated unfairly or discriminated against because of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation.

Suppliers must also commit to a workforce free of any bullying or harassment, which includes physical, mental, sexual or verbal.

Suppliers should promote equal opportunities for, and treatment of, their employees irrespective of race, ethnicity, sexual orientation, age, gender, colour, disability, religion, political affiliation, marital status or any other factor which cannot be justified. These non-discrimination requirements should also be prevalent within a suppliers screening and hiring processes.

A copy of our [Human Rights Policy Statement](#) can be found by clicking on the link.

Child and Forced Labour

Suppliers must confirm that they do not and will not employ workers under the legal minimum age for work as stipulated by the Employment Act 2008 and the International Labour Organisation (ILO) Convention 138 'Minimum Age convention'. Suppliers must also comply with the provisions of the Modern Slavery Act 2015 and the rules laid out by the International Labour Organisation.

TGG has a zero-tolerance approach to underage workers and modern slavery.

Health and Safety

Suppliers must provide a clean and safe working environment for their employees. Clear procedures must be in place to ensure health, safety and wellbeing legislation and standards are adhered to, such as ensuring all work environments are safe and hygienic and promote the welfare of employees as far as reasonably practicable.

A copy of our [Health and Safety Policy Statement](#) can be found by clicking on the link.

Business Continuity Planning

Suppliers should be prepared for any disruptions to their business (e.g., terrorism, natural disasters, pandemics and cyber security breaches), including having appropriate emergency preparedness and disaster recovery plans in place.

Media and Investor Relations

Suppliers should not instigate any form of publicity or make any statement or submission to their investors or the media referring to TGG without first obtaining prior written consent (except where required to do so under law).

Non-Compliance

Where compliance with this Supplier Code of Conduct could lead to a conflict with or a violation of applicable laws or regulations, you shall promptly notify TGG of the situation so we can work together to eliminate or minimise the risk of a breach.

Assessment against the Supplier Code of Conduct

TGG reserves the right to monitor our supplier's compliance with this Code of Conduct by conducting risk assessments and third-party audits on an annual basis. This may also include a review of supplier performance data, policies and procedures.

Review of the Supplier Code of Conduct

This Code of Conduct will be reviewed annually by TGG's Procurement Manager. TGG may review and refresh this Code more regularly should there be significant changes required. Significant changes must be communicated via the appropriate channels including TGG's email and website.

Contact

Please provide any feedback, queries or concerns, as well as any reports of violation against this Supplier Code of Conduct to procurement@thegymgroup.com.

Enforcement

In the event of a breach, the Procurement Manager will notify the Executive Committee and a full investigation will take place. All communication will be processed in a confidential manner.