

# Human Rights Policy Statement

Founded in 2007, The Gym Group 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.

At The Gym Group, we are committed to protecting the human rights of all our employees and of everyone who receives direct or indirect services from us. As a responsible, ethical business we fully support the principles of the Human Rights Act and all associated laws and regulations.

This statement is guided by the UK Human Rights Act 1998 and supports:

- the Universal Declaration of Human Rights;
- the International Labour Organisation's Declaration on Fundamental Principles;
- Rights at Work and the UN Guiding Principles on Business and Human Rights;
- The International Covenant on Civil and Political Rights; and
- The International Covenant on Economic, Social and Cultural Rights.

## Scope

This policy statement applies to our whole business and stakeholder groups including; shareholders, lending banks, employees (whether employed on a temporary, fixed term, permanent or part-time basis), contractors, members and communities. The Gym Group gives particular attention to at-risk or vulnerable groups.

We expect our suppliers, including self-employed Personal Trainers, to uphold the same principles within their businesses. We seek to establish relationships with entities that share the same principles and values as The Gym Group.

## Responsibilities

### Respect for Human Rights

We strive to respect and promote internationally recognised human rights through the policies and procedures we implement, our values and culture. We are committed to identifying, preventing, and mitigating the negative impact of adverse human rights on the economy, environment, and people resulting from, or caused by, our business activities.

The Gym Group aims to remediate any negative impacts done to human rights through its robust grievance mechanisms, as highlighted in this document. Our internal policies and external complaints procedures support a means for individuals and communities to access remedy.

## Child Labour

We 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'.

We shall ensure that all 'young persons' as defined by the Management of Health and Safety at Work Regulations 1999 are supervised and monitored at all times by a competent person. For young workers high-level risk assessments are carried out to broadly cover any risks posed to them. Where we accept any young person on a work experience programme we shall ensure that a specific Children and Young Workers Checklist is completed with the employee in order to identify the hazards particularly related to the employment of young and inexperienced persons in the workplace.

## Modern Slavery

We are committed to compliance with the provisions of the Modern Slavery Act 2015. As such, The Gym Group has a zero-tolerance approach to forced or compulsory labour and we are further committed to acting ethically, with transparency and integrity in all our business dealings and relationships, including within our supply chain. To see our latest Modern Slavery Act Transparency Statement please go to <https://www.tggplc.com/modern-slavery-act-2022>

## Equality, Diversity and Inclusion

We are committed to providing a safe and inclusive environment at The Gym Group where people are treated with dignity and respect. We will not discriminate 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. We have a zero tolerance approach to discrimination, bullying and harassment and our [D&I Manifesto](#) and [Dignity at The Gym Group policy](#) further outlines our commitments and the initiatives we have in place to support this.

## Discipline

We will not employ, or allow to be employed, any form of corporate punishment, physical coercion or verbal abuse. Any disciplinary matter will be dealt with through formal procedures. Our Grievance and [Whistleblowing policies](#) and complaints procedures ensure fair complaint handling processes are adhered to.

## Working Conditions and Working Hours

We provide fair working conditions for our employees. Employees are provided with written contracts of employment, with agreed terms and conditions, including but not limited to notice periods on both sides, remuneration, working hours, benefits and leave entitlements. We comply with all applicable legislation. Working time directives are adhered to as per the Working Time Regulations 1998 with opt-out clauses publicised to staff. Employees are provided with the appropriate job skills training and comprehensive induction programmes.



To support employees in balancing their home and work life The Gym Group are open to flexible working arrangements and we ensure all employees have the right to request flexible working from the moment they join us. Our Flexible Working policy considers a range of flexible working options such as job sharing, part-time working, voluntary reduced working time, working from home and career breaks. The Gym Group recognise that there may be alternatives, and that the working pattern that may suit any particular individual could be a unique one involving a combination of options.

At The Gym Group we are committed to providing security of employment, as much as possible. In the event that redundancy situations arise, we will take reasonable steps to find those impacted by redundancy alternative work within The Gym Group. In addition, those impacted are provided with access to job search support, reasonable paid absence to attend job interviews and one to one internal support. The Gym Group also commits to providing wellbeing support.

### **Fair and Decent Pay**

We are committed to ensuring that wages paid for standard working hours will meet or exceed national minimum wage levels and provide all employees with a range of benefits (both financial and non-financial) appropriate to their role.

### **Health & Safety**

At The Gym Group we regard health and safety as one of our main priorities and Health & Safety forms an integral part of our operation and systems of work. We recognise the duties placed on us by the Health and Safety at Work etc. Act 1974 as well as other supporting pieces of legislation and that we have a duty to ensure so far as is reasonably practicable the health, safety and welfare of all our employees and any other person who may be affected by our undertakings.

We are committed to striving for a positive health and safety culture by ensuring the provision of a safe working environment and safe systems of work, as well as ensuring that our legal obligations are met, and wherever reasonably practicable, exceeded.

Our occupational health and safety management system conforms to ISO 45001:2018. The standard mandates that The Gym Group establishes and maintains arrangements for worker participation and consultation in the development, implementation and evaluation of the occupational health and safety management system.

Health and safety at The Gym Group is governed through the wider sustainability governance framework and ensures:

- Accountability for health and safety at strategic, tactical and operational levels.
- Health and safety performance is reported directly to The Gym Group's Board and that any health and safety objectives are compatible with the company's strategic direction.
- That there is appropriate consultation across all levels of business, including with non-managerial employees, in relation to risk, policy changes and all other health and safety matters.
- That employee health and safety matters can be discussed and escalated through our working groups and up to Board level, if required
- That we are able to effectively determine any barriers or obstacles to participation in health and safety to enable us to remove barriers or reduce those that cannot be removed.

Further details of our health and safety commitments, responsibilities and practices are outlined within The Gym Group Health & Safety Policy.

### **Freedom of association and collective bargaining**

We are committed to an open and constructive dialogue with our employees and provide opportunities for employees to share their views through surveys and employee forums. We respect our employees' right to associate or not associate with a labour/trade union without fear of detrimental treatment and employees are free to join organisations of their choice to represent them in line with local legislation. These rights will not be restricted or interfered with. The Company is committed to bargaining in good faith with such representatives.

### **Training and awareness**

All employees receive regular mandatory training in Equality Diversity and Inclusion, Anti-Bribery and Corruption, Health and Safety, Cyber Security and GDPR as well as any relevant job specific training for safety risks.

### **Control**

This policy statement does not form part of any employee's contract of employment and may be amended at any time.

This policy statement is overseen by The Gym Group Sustainability Committee and Board. The Gym Group will review the policy annually and amend and update where relevant and appropriate.

This policy statement is communicated with employees and stakeholders via our website and internal communication platform. All operations and departments within the company are responsible for implementing the policy statement.

A handwritten signature in black ink, appearing to read 'Richard Darwin'.

Richard Darwin  
Chief Executive Officer  
The Gym Group plc

Date: November 2022