



**PURE GYM LIMITED**

## **MODERN SLAVERY AND HUMAN TRAFFICING STATEMENT**

**5 MAY 2021**

### **Introduction**

We recognise that we have a responsibility to prevent modern slavery and human trafficking from existing in both our business and our supply chain.

Whilst we believe that both our business and the industry sector in which we operate are relatively low risk in this regard, our Slavery and Human Trafficking Statement is a reflection of this responsibility and it sets out our commitment to developing and implementing business practices which ensure that we do not allow modern slavery and human trafficking to take place.

### **Organisation structure and supply chain**

Pure Gym Limited ("PureGym") is the largest operator of gyms in the UK, both by number of gyms and members and as at our most recent financial year end, 31 December 2020, we employed 3,255 people across our 274 gyms and our offices in Leeds, London and Southampton.

We consider that the principal areas in which the business faces risks related to modern slavery include people working in our gyms and central support functions, our supply chain and outsource providers (such as cleaning and maintenance).

### **Our Policy**

We take reasonable steps to mitigate against the risk of slavery or human trafficking occurring in our supply chain or in any part of our business. We have implemented an Anti-Slavery and Human Trafficking policy which underpins our commitment to zero tolerance in this regard.

We also have a whistle blowing policy in place, which encourages our employees and other stakeholders to report any wrongdoing in our business including those related to modern slavery or human trafficking. If we receive any reports relating to these matters they will be fully investigated and appropriate actions taken.

### **Our procedures, due diligence and risk management**

#### *Our employees*

Pure Gym Limited owns and operates all of its gyms in the UK. We have clear employment policies and processes in place, which include formal contracts of employment and checks of legal entitlement to work in the UK. Failure to comply with our policies and procedures can result in disciplinary action against our employees, which can include immediate suspension or termination of their employment.

#### *Self-employed personal trainers*

Self-employed personal trainers who carry out their business on our premises enter into formal licence agreements and have their qualifications and insurance cover verified as part of the onboarding process.

### *Key suppliers and outsource partners*

Our key suppliers include gym fit-out contractors, gym equipment suppliers and outsourced providers such as cleaning and maintenance. We seek to deal with reputable suppliers and operate competitive tender processes for significant contracts and ensure effective due diligence and risk assessments are undertaken as part of this process. We require all of our suppliers to evidence that appropriate anti-slavery and human trafficking policies and processes in place and have visited the manufacturing facilities of our overseas suppliers where it has been practical to do so. We will also ensure that we continue to monitor our suppliers as part of our risk management framework on an ongoing basis. We have a Code of Conduct which we expect all of our suppliers to adhere to, and we have contractual obligations that they will comply with the Modern Slavery Act.

By publishing this statement on our website, we are communicating to all suppliers that we have zero tolerance in regards modern slavery and human trafficking.

### **Training and continuing commitment**

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chains and our business, all members of our senior management team have been briefed on the subject and our Procurement Director maintains oversight of all procurement and supply management processes.

This statement was approved by the Board on 5 May 2021, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Pure Gym Limited's slavery and human trafficking statement for the current financial year. This statement will be reviewed on an annual basis.



Humphrey Cobbold  
Chief Executive Officer  
Pure Gym Limited