



**PURE GYM LIMITED**

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

**4 MAY 2022**

### **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. We have a zero-tolerance approach to modern slavery and human trafficking and are committed to developing and implementing business practices that ensure we can prevent, identify, and report any potential breach of our Modern Slavery and Human Trafficking policy.

Whilst we believe that both our business and the industry sector in which we operate are relatively low risk in this regard, our Modern Slavery and Human Trafficking Statement reflects this responsibility and it sets out, underpinned by our Modern Slavery and Human Trafficking policy, our commitment to preventing modern slavery and human trafficking from taking 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 2021, we employed 3,247 people across our 296 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 a Modern Slavery and Human Trafficking policy which underpins our commitment to zero tolerance in this regard.

Our policy provides guidance on how our employees, and anyone working alongside or with PureGym can prevent, identify and report any breach of our Modern Slavery and Human Trafficking policy, and it sets out the responsibility that all individuals working for or with PureGym have for understanding and complying with the policy.

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 modern 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 and are committed to acting ethically, transparently and with integrity in all of our business dealings and relationships.

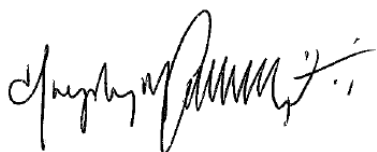
### **Training and continuing commitment**

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.

Training on our Modern Slavery and Human Trafficking policy, and on the risk our business faces from modern slavery in its supply chain, is provided to all individuals who work for us, and further training will be provided as necessary.

Our zero-tolerance approach to modern slavery in our business and supply chains is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

This statement was approved by the Board on 4 May 2022, 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