

# Modern Slavery and Human Trafficking Statement

This statement is made in accordance with the requirements of the Modern Slavery Act 2015 (the 'Act') as it applies to The Gym Group plc, The Gym Limited and all entities in The Gym Group plc group (the 'Group' or 'The Gym Group'). The full list of entities, and more information on the Group, may be found in our Annual Report, which is available on the Investor section of our website [www.tggplc.com](http://www.tggplc.com).

The Gym Group is committed to compliance with the provisions of the Act. As such, the Group has a zero-tolerance approach to modern slavery and human trafficking and we are further committed to acting ethically, transparently and with integrity in all of our business dealings and relationships.

## Organisation structure and supply chains

The Gym Group is a leading provider of low cost, high quality gyms based in the UK that are open 24/7, with over 2,000 employees. Our staffing model means that our gyms are managed by our own employees, who are supported by outsourced providers for services such as maintenance and cleaning.

As such, we consider the principal areas in which the Group faces risks related to slavery and human trafficking to be:

- The Gym Group supply chain;
- Outsourced providers; and
- People working in our gyms and other functions.

High standards of ethics and business conduct and a commitment to operating a sustainable business are important to being a responsible part of the communities in which we operate. The majority of our suppliers are located in the UK, which the Board considers to be lower risk given they are required to comply with the Act and other related UK legislation.

We describe the arrangements in place at The Gym Group below, including relevant risk management and due diligence processes.

## Managing risks related to slavery and human trafficking

Responsibility for managing modern slavery risks is shared across relevant business functions, including Procurement and the People team. No instances of modern slavery or human trafficking were identified during the reporting period through our existing controls, supplier engagement or whistleblowing mechanisms. The Group assesses and manages risk in the following areas:

### Supply chain risk assessment and management

The Gym Group maintains good relationships with its key suppliers and seeks to treat all suppliers ethically and professionally. As part of our formal risk review process, we consider

the risk of supplier failure in relation to business interruption and potential reputational risk. In addition, relationships with key suppliers is considered to be a principal risk for the Group and mitigations and controls are outlined in our Annual Report for 2025.

We actively work with our suppliers to understand the significant issues which matter to them and minimise disruption. We consider the supply chain to be an important part of business sustainability and include suppliers as a key stakeholder in our sustainability materiality assessment. There were no issues raised from our supply chain risk assessment during the year.

### Outsourced providers

Our contracts and relationships with critical suppliers must be value for money and regularly reviewed. In addition, third parties must comply with appropriate regulatory and ethical standards and our Supplier Code of Conduct. We operate competitive tender processes for significant contracts and consider the reputation of suppliers as part of this process. We inform our suppliers that we are not prepared to accept any form of exploitation in their business or any part of their supply chain by publishing our Modern Slavery and Human Trafficking Statement on our website.

Our internal Procurement Governance Policy, along with supporting guidance documentation, aims to strengthen our procurement processes. Also, our Supplier Code of Conduct, published on our corporate website, sets out the standards expected from our suppliers, including our expectations around prevention of modern slavery and human trafficking. This is shared with new potential material suppliers who are assessed against these criteria during the selection process.

We do not currently have formal key performance indicators relating to suppliers.

### People working in our gyms and other functions

As part of our commitment as an employer, we:

- ensure all our employees have a written contract of employment;
- ensure employees are legally entitled to work in the UK;
- provide information to all new employees regarding their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to; and
- communicate with our employees regularly and make available, appropriate training and policies relevant to their roles.

#### *Fitness trainers*

We have over 1200 Fitness Trainers working various levels of contracted hours who are subject to our employment policies and processes, including formal contracts of employment and checks of their legal entitlement to work in the UK. Employees' failure to comply with our policies and procedures can result in disciplinary action, including immediate suspension or termination of their employment.

#### *Personal trainers*

Personal Trainers enter into a standalone agreement and are self-employed to develop their business, with our members. Their qualifications and insurance cover, with a reputable insurance firm, are verified prior to working from our gyms.

## Other related policies

We have a suite of policies intended to support a safe working environment, including policies regarding our Code of Conduct and Ethics, Supplier Code of Conduct, Health & Safety, Whistleblowing, Anti-Bribery and Anti-Corruption, Anti-Fraud, Human & Labour Rights, Right to Work and Dignity at the Gym. Most of these policies including our Human Rights Policy Statement, may be found on the Sustainability section of our website <https://www.tggplc.com/sustainability/policy-statements>. These policies are also available on our HR platform, which is accessible to all staff. We are satisfied that we have appropriate working practices and policies in place, and we also review requirements for training and employee guidance, in these areas, on an ongoing basis.

## Anti-slavery training

During 2025, we launched anti-slavery training as part of our wider legal compliance module, which is mandatory for all staff. Staff were also required to complete our annual Anti-Bribery, Anti-Corruption, Fraud and Whistleblowing training.

We continue to use our communications platform to ensure policies, guidance and training are clearly and promptly shared with all who need them and proactively engage with our employees. We use a Learning Management System to host, share and mandate workplace learning for all employees, which supports us in ensuring that training and guidance is given to those who require it. The Learning Management System enables us to monitor completion rates across Gym Support and Operations and encourage participation where required.

## Board oversight

This statement was approved by the Board of Directors of The Gym Group plc on 15 June 2026.



John Treharne  
Chair of the Board  
For and on behalf of The Gym Group plc

Our previous Modern Slavery and Human Trafficking Statements may be found on our website at <https://www.tggplc.com/sustainability/reports>