

Slavery and Human Trafficking Statement

This slavery and human trafficking statement is for the year ending 31 December 2023 under the Modern Slavery Act 2015. It covers the following companies which are all part of the group headed by Deuce Topco Limited.

- Deuce Topco Limited
- Deuce Holdco Limited
- Deuce Parentco Limited
- Deuce Midco Limited
- Deuce Acquisitions Limited
- David Lloyd Leisure Operations Holdings Limited
- David Lloyd Leisure Group Limited
- DLL Greenwich Limited
- David Lloyd Leisure Limited
- David Lloyd Leisure GR Limited

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, force and compulsory labour and human trafficking, all of which exploit someone else for the purpose of personal or commercial gain.

Our Position

David Lloyd Leisure have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships to ensure that modern slavery is not taking place in our business or supply chains.

Our Business

As part of our initiative to identify and mitigate risk, all employees have a role to ensure that we are vigilant with respect to our suppliers and other employees in our business to ensure that no such activities take place. We have an Anti-Slavery Working Group in place who review progress against actions and set our agenda for the future.

Our Supply Chain

At David Lloyd Leisure, we have a sizeable Supply Chain consisting of over 4,000 suppliers providing a vast number of products and services to 100+ clubs across the UK. Our main areas of spend consist of food & beverages, laundry, contracted cleaning services, pool chemicals, testing equipment and disposables, gym & sports equipment, spa consumables, service and maintenance contracts, various garments, and waste collections. We cooperate with all size vendors, from self-employed professionals to large global companies with procured products mostly coming from the UK and smaller volumes sourced from other areas of the globe, coming from as distant areas as the Far East, through to our UK partners. As a business, David Lloyd has taken certain steps to ensure that slavery and human trafficking is not taking place in any of our supply chains. It is the responsibility of the Supply Chain team to ensure that our suppliers are aware of our purchasing terms and conditions and our supplier code of conduct. We use a risk matrix to identify our high-risk suppliers and then follow our high-risk supplier review processes.

Our People

At David Lloyd Leisure, we have over 10,000 employees working across 133 clubs, located in 9 different countries within both the UK and Europe. All new starters are required to complete a compulsory online training module on 'Modern Slavery', that we review to ensure it is up to date. Our Slavery and Human Trafficking guidelines for our team members are outlined below. We have an ongoing audit process in place to ensure that all team members' employment records have the appropriate right to work documentation, a valid visa (where relevant) and a copy of the employment contract.

Related Documents

There are several company documents that should be read in conjunction with this statement:

- Whistleblowing Policy
- Health and Safety Policy
- Anti-Bribery Policy
- Supplier Code of Conduct

Endorsement

This report has been compiled by the Supply Chain and People Team and has been authorised and approved by the Chief Executive Officer, Russell Barnes. This report is reviewed and published annually.



Russell Barnes

31st December 2023



Slavery and Human Trafficking Guidelines

What is Modern Slavery?

Modern slavery is an international crime. It can include victims that have been brought from overseas or vulnerable people in the UK, being forced illegally to work against their will in many different sectors. It includes offences relating to trafficking and slavery, aiding, abetting, or procuring forced labour or human trafficking, or being an accessory to such offences. Examples include:

- **Forced labour:** Victims are forced to work against their will.
- **Debt bondage:** Victims are forced to work to pay off debts that realistically they may never be able to.
- **Sexual exploitation:** Victims are forced to perform acts against their will.
- **Criminal Exploitation:** Victims are controlled to perform crimes such as cannabis cultivation or pick pocketing against their will.
- **Domestic servitude:** Victims are forced to carry out housework and domestic chores in private households with little or no pay.

What are the signs?

- **Physical appearance** – Signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn.
- **Isolation** – They may seem under the control or influence of others, avoid interaction, rarely travel alone, they may be dropped off and collected from work.
- **Poor living conditions** – Several people living at the same address, at often dirty, cramped, and overcrowded accommodation.
- **Few or no personal effects** – Few identification documents or few clothes.
- **Reluctant to seek help** – They may avoid eye contact, appear frightened or hesitant to talk to strangers.

What can you do?

If you spot the signs or have any reason for concern, you should report it through one of the following channels:

- Speak to your manager or a member of the People department in the first instance.
- If this isn't appropriate or you would prefer to, please use the Whistle Blow contact.
- If you are not comfortable reporting this internally within the business, call the modern slavery helpline on 0800 0121 700 or contact our Employee Advice line on 0800 0280 199.

Slavery and Human Trafficking Actions Taken in 2023

Created the Anti-Slavery Working Group with the purpose of updating the Slavery Statement annually with the action taken during the year and setting the agenda for the following year. The working group includes team members across the Supply Chain and People teams who are responsible for delivering the agenda. They meet quarterly and publish the report annually. The Anti-Slavery Working Group for 2023 includes:

- Head of Reward & Employee Experience
- Head of Corporate Administration
- Head of UK Supply Chain
- Senior Buyer
- Reward, Policy & HR Systems Manager
- Diversity, Equity & Inclusion Manager

Employees

- We have a consistent practice in place to ensure that all team members have their pay paid to a bank account held in their name.
- We have conducted an initial audit of right to work documentation and set up a monthly process to ensure that all team members have the appropriate documentation saved on the electronic employment record.
- We have conducted an initial audit of visa documentation and set up a monthly process to ensure that all team members have the appropriate in date visa documentation saved on the electronic employment record.
- We have conducted an initial audit to ensure that all team members that have joined since 2020 have a copy of their employment contract saved on the electronic employment record and set up a monthly process to ensure that this is checked ongoing.
- We have reviewed the online new starter Anti-Slavery training to ensure that it is up to date and covers how to spot the signs and how to report.
- We have reviewed the likelihood and risk of us employing trafficked labour to identify the need to repeat training or offer alternative training.

Supply Chain

- We have a consistent practice in place for new suppliers including issuing our purchasing terms and conditions, supplier code of conduct and gathering confirmation that they are aware of the antibribery policy and modern slavery act.
- We have introduced a risk matrix approach to the management of our suppliers. We have identified the criteria for the risk matrix and the suppliers managed by the procurement team. These suppliers have been assessed against this criterion to identify those we would class as high risk.
- We have created a process to check the financial status of our suppliers and set up alerts to their change in status.
- We have identified the process to review these high-risk suppliers as follows:
 - Credit checks.
 - Request up to date copy of their anti-slavery policy.
 - Issue our latest purchasing terms and conditions and our supplier code of conduct.
 - Send a questionnaire to identify any areas for focus and review.
 - We have conducted credit checks, obtained copies of the anti-slavery policy, and issued our latest purchasing terms & conditions and our supplier code of conduct to all the suppliers identified as high risk.
- We have created a questionnaire to send to our high-risk suppliers.