

PURE GYM LIMITED

MODERN SLAVERY AND HUMAN TRAFFICING STATEMENT

30 APRIL 2019

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 was founded in 2008 and as at our most recent financial year end in December 2018, we employed 1,052 people at our 222 gyms and our offices in Leeds, London and Southampton. We are the leading operator of gyms in the UK by number of sites and number of members.

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

All of our gyms are owned and operated in the UK by Pure Gym Limited. We have clear employment policies and processes in place, which include a formal contract of employment and checks of their 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. As part of this process we require our suppliers to have 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.

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 we are reviewing potential options for cascading this further to relevant members of our team who are involved in procurement and supplier management processes, as part of a wider learning and development plan.

This statement was approved by the Board on 30 April 2019, 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