

THE PUREGYM GROUP ●

SUPPLIER CODE OF CONDUCT

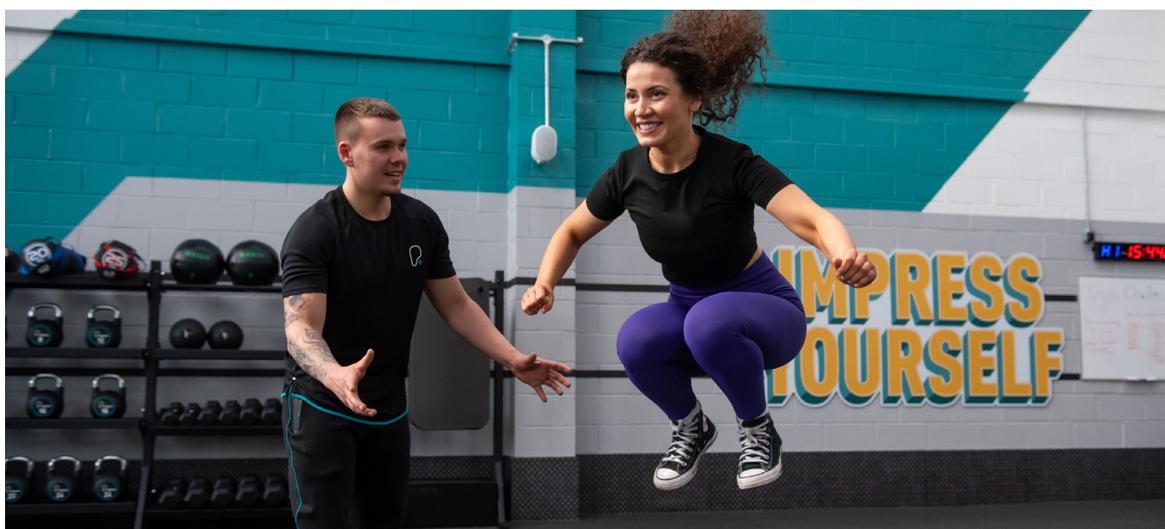
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PUREGYM APPROACH

At The PureGym Group, we believe in Everybody Welcome - we pride ourselves on offering gyms that are friendly, supportive and judgement free spaces where everybody can come in, workout and leave feeling good. We achieve this through our strong culture which is built around our core values that we ask our employees and suppliers to live and breathe in and out of the workplace.

Our suppliers play a vital role in helping our members lead a healthier life every day, and we ask that they do this whilst conducting themselves in accordance with our values; treating all people with respect; acting with personal integrity; having high ethical standards and complying with all legal obligations.



This Code of Conduct sets out the behaviours that we expect from our suppliers and their sub suppliers. All our suppliers are responsible for ensuring that their conduct does not fall below the standards set out in this code.

This Code of Conduct applies to all PureGym Group suppliers at all locations globally.

MODERN SLAVERY

The PureGym Group have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to providing transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our suppliers.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

GLOBAL HUMAN RIGHTS

At The PureGym Group we believe upholding human rights is fundamental to our values and our purpose of providing accessible, flexible, and affordable fitness, and activity to all.

We draw our understanding of these rights from the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural rights), related treaties and declarations, and the broader ethical reasoning behind their development. The Group's approach to respecting and upholding human rights is informed by the United Nations Guiding Principles on Business and Human Rights.

We strive to respect and uphold the following human rights, that we have identified to be the most relevant in our operations and working environments:

- health and safety – the right of all people to enjoy a physically and psychologically safe work environment
- labour rights – the right of all people to just and favourable terms of employment
- diversity, inclusion and belonging – the right of all people to be respected and valued for their difference, with equitable opportunities and outcomes, in an inclusive environment where all can thrive
- the right to freedom of association and collective bargaining and effective information and consultation procedures
- our responsibility to respect human rights extends into our supply chains, where we expect suppliers to adhere to the above principles.

RESPONSIBLE BUSINESS SUSTAINABILITY

All businesses have a responsibility to be proactively managing, and reducing, their environmental impact. We expect you to understand these impacts and to:

- abide by all legislation and regulations related to environmental protection
- have a sustainability strategy which sets out how your organisation is working to reduce your environmental impacts and support the transition to a low-carbon economy
- collaborate with us to help reduce our environmental impacts (which include carbon reduction, energy consumption, travel, water consumption and operational waste)
- consider measuring your organisation's environmental impact and put in place plans to reduce these impacts

BRIBERY & CORRUPTION

The highest standard of integrity is expected in all business interactions and suppliers must comply with all applicable laws and regulations on Bribery and Corruption.

Suppliers must not offer gifts and hospitality to PureGym Group employees to influence business decisions.

MONEY LAUNDERING & TAX EVASION

The PureGym Group expect our suppliers to comply with all applicable statute governing the prevention of money laundering, and not to participate in any money laundering activities. We have zero tolerance for tax evasion or the facilitation of tax evasion and we expect our suppliers to operate on the same basis.

CONFLICT OF INTERESTS

In our suppliers' business dealings, we expect our suppliers to take decisions based on objective criteria only. Any factors that influence the suppliers' decisions due to private, business or other conflicts of interest must be prevented from the start.

If any situation in regard of a potential conflict of interest arises, PureGym Group expects its suppliers to make us aware of the situation without delay.

WHAT YOU NEED TO DO

You are expected to:

- confirm your agreement to comply with this Code (and any future revisions) when you complete our due diligence and agree contract terms.
- explain the principles of this Code to your employees and key sub-contractors that support the Group or work on our projects.
- ensure fair and honest business with all your stakeholders, including employees, sub-contractors and other third parties.
- inform us if anything changes and you are unable to comply with the Code.

You are encouraged to:

- speak up if you are concerned about any actions or decisions that contravene the standards set out in this Code*.
- let us know if you would like to collaborate on any specific areas relating to Responsible Business or Sustainability.

In situations where you are not yet compliant with the expectations set out in this Code, you must let us know. We will work with you on the development of an improvement plan.



SPEAK UP

You can contact our confidential whistleblowing service, **SeeHearSpeakUp**, on a 24-hour confidential hotline **00800 9687 4357**; by emailing report@seehearspeakup.co.uk or, by providing information of your concern at www.seehearspeakup.co.uk/file-a-report