

CONFLICT OF INTEREST POLICY

SUMMARY

We conduct all our business in an honest, straightforward way and encourage everyone who works with the PureGym Group to act with integrity. It's important to us that our team members, and anyone who works alongside the PureGym Group, acts and always behaves with our best interests in mind. This policy aims to protect the interests of the PureGym Group by setting out guidance on when a conflict of interest may occur, and our responsibilities on how to deal with it.

This policy applies to all individuals who work for the PureGym Group and includes anyone working with, or alongside the PureGym Group. It is intended to be used at a global level.

Non-compliance with this policy may result in internal disciplinary action, including termination of employment and may result in civil and criminal liability against the PureGym Group and/or any individuals who work for the PureGym Group that are involved in the breach.

WHAT IS A CONFLICT OF INTEREST?

A conflict of interest occurs when your personal interest conflicts with the interests of the PureGym Group as a business, or anyone who works for, or alongside the PureGym Group. It is typically when your personal interests can influence, or appear to influence, decisions you make at work, compromise your judgment and independence, and damage the PureGym Group's reputation. There are many ways where a conflict of interest may occur, and it's important you understand what to look out for, and when they may arise.

Typical conflicts of interests are, but not limited to:

- Managing or hiring a family member or friend
- Personal relationships with fellow employees or third parties who work alongside the PureGym Group
- Maintaining secondary employment that conflicts with the nature of our business, or your ability to fulfil the role you are employed to do
- A family member or friend who works for a competitor of the PureGym Group
- A family member or friend who works for a supplier or third-party that works with or alongside the PureGym Group
- Accepting gifts – you should refer to our Group Anti-Corruption and Anti-Bribery Policy
- Holding shares, or having significant interest in a supplier or third-party that works with or alongside the PureGym Group
- Inability to act within the best interests of the PureGym Group because of personal relationships
- Serving as a director of another for-profit company
- Making disparaging comments about, or otherwise behaving in a way that could damage, the PureGym Group

EXAMPLES

Resourcing and Talent Management

- You are responsible for interviewing, or for any aspect of the hiring process, and have a personal relationship (e.g. a family member or friend) with someone who is applying for the role
- Your role means that you can influence the decision of the person managing the hiring process, and you have a personal relationship with someone they are considering for the role

Personal Relationships

- You have a personal relationship with someone who you are a direct line manager of, and they are part of your team
- You have a personal relationship with a peer who works within the same team, reporting to the same line manager

Suppliers and Third Parties

- You have a personal relationship with someone who works for, or is involved with, a direct competitor of the PureGym Group
- You are associated with a supplier or third party, either through a personal relationship or holding an additional interest such as shares, and this may influence how you deal with them and decisions you make in relation to the PureGym Group's relationship with that supplier or third party

Using confidential information or resources

- You use PureGym's equipment or resources such as time, intellectual property, or confidential information, for your personal benefit or for the benefit of someone outside PureGym
- You discuss confidential business information such as financial performance data, plans for growth, operational plans and individual personal data with a family member or friend who is associated with a competitor, supplier or third-party

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YOUR RESPONSIBILITIES

You should read, understand, and comply with this policy. It is everyone's responsibility to be aware of what a conflict of interest is and when it may occur.

You must notify your Manager or the People Team as soon as possible if you become aware of a conflict of interest or have reason to believe one may occur.

If you are an employee and you breach this policy, you may face formal disciplinary action up to and including gross misconduct and summary dismissal.

If you are a worker or third party and you breach this policy whilst working with us, we reserve our right to terminate our contractual relationship with you.

RAISING A CONCERN

A conflict of interest may occur without intention such as becoming involved in a personal relationship with a fellow team member of, or an employee of a supplier to the PureGym Group. We may not always need to act, but it is important that you inform your line manager as soon as possible so we can identify any concern and support you in understanding whether a conflict of interest has occurred and what action may be required.

If you are concerned that you have a conflict of interest or, that there is a conflict of interest occurring elsewhere, we hope that you feel comfortable speaking to your manager directly or, if you feel they are part of the conflict, you should contact the People Team.

If you would prefer to raise a concern confidentially, 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.

If you are unsure whether something is a conflict of interest, or if you have other queries relating to this policy, you should speak to your manager or a member of the People Team.

We may need to conduct a formal investigation into the concerns you have raised, so telling us as much information as you can early on is important. By presenting facts, dates, copies of communication or any other evidence to support your concern you give us a solid platform to work from.

This policy is not contractual, and we may amend it from time to time.