

Modern Slavery Statement

9 June 2025

Introduction

At PureGym we recognise that we have a responsibility to prevent modern slavery and human trafficking from existing in both our business, and our supply chain. We have a zero-tolerance approach to modern slavery and human trafficking and are committed to developing and implementing business practices that ensure we can prevent, identify, and report any potential breach of our Modern Slavery and Human Trafficking policy.

Whilst we believe that both our business and the industry sector in which we operate are relatively low risk in this regard, our Modern Slavery Statement reflects this responsibility and it sets out, underpinned by our Modern Slavery and Human Trafficking policy, our commitment to preventing modern slavery and human trafficking from taking place.

Organisation structure and supply chain

The Pure Gym Group ("PureGym") provides high quality, low cost, flexible physical fitness facilities. PureGym is the largest gym and fitness operator in the UK, and the second largest in Europe with 598 sites across its corporate owned sites in the UK, Denmark and Switzerland at 31 December 2024, operating under the PureGym brand. During 2024 the group considerably increased its presence in the USA with the strategic acquisition of 56 sites in New York and New Jersey, bringing the total number of gyms in the USA to 59 at 31 December 2024; during 2025 these USA gyms will be rebranded to the PureGym brand. PureGym also operates franchise sites in the Middle East, with 23 gyms at 31 December 2024.

The average number of employees across the group in the year ended 31 December 2024 was 6,063 in operations and 625 in central support in our offices in Leeds, London, Copenhagen, Zurich, New York and Virginia.

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 equipment and uniform manufacturing, 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 a Modern Slavery and Human Trafficking policy which underpins our commitment to zero tolerance in this regard.

Our policy provides guidance on how our employees, and anyone working alongside or with PureGym can prevent, identify and report any breach of our Modern Slavery and Human Trafficking policy, and it sets out the responsibility that all individuals working for or with PureGym have for understanding and complying with the policy.

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

PureGym owns and operates all of its gyms in the UK, Denmark, Switzerland and the USA. We have clear employment policies and processes in place, which include formal contracts of employment and checks of legal entitlement to work. 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 and ensure effective due diligence and risk assessments are undertaken as part of this process. We require all of our suppliers to evidence that appropriate modern slavery and human trafficking policies and process are in place. We will also ensure that we continue to monitor

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our suppliers as part of our risk management framework on an ongoing basis. We have a Code of Conduct which we expect all of our suppliers to adhere to, and we have contractual obligations that they, and each of their subcontractors, shall comply with all applicable laws, statutes, regulations and codes from time to time in force relating to the prevention of slavery and human trafficking.

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 and are committed to acting ethically, transparently and with integrity in all of our business dealings and relationships.

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 our Procurement Director maintains oversight of all procurement and supply management processes.

Training on our Modern Slavery and Human Trafficking policy, and on the risk our business faces from modern slavery in its supply chain, is provided to all individuals who work for us, and further training will be provided as necessary.

Our zero-tolerance approach to modern slavery in our business and supply chains is communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

This statement was approved by the Board on 9 June 2025, is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes PureGym's Modern Slavery Statement for the current financial year. This statement will be reviewed on an annual basis.



Clive Chesser
Chief Executive Officer
Pure Gym Group