

WHISTLEBLOWING POLICY

SUMMARY

At the PureGym Group, we are committed to conducting our business with honesty and integrity and we expect all our team members to maintain high standards of conduct at all times, and we encourage you to report suspected wrongdoing as soon as possible.

All organisations face the risk of unknowingly harbouring illegal or unethical conduct and team members are often the first to notice when someone in a company is doing something illegal or improper. However, team members may feel worried about voicing their concerns. The PureGym Group is committed to creating a culture of openness and accountability to prevent such situations occurring and to address them when they do occur. The aims of this policy are:

- To encourage team members to report suspected wrongdoing in the business as soon as possible, in the knowledge that concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected
- To ensure that team members feel confident that they can raise genuine concerns without the fear of reprisals, victimisation, discrimination, or disadvantage, even if they turn out to be mistaken
- To provide team members with guidance as to how to raise their concerns

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 and is part of the PureGym Group's system of internal control and governance.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes:

- Bribery
- Corruption
- Fraud or other criminal or negligent activity
- Unethical or dishonest behaviour
- Sexual Harassment
- Financial mismanagement
- Miscarriages of justice
- Modern slavery and related offences
- Health & Safety risks
- Damage to the environment
- Inappropriate marketing and selling practices, or any other conduct or behaviour that is likely to damage our reputation
- Incorrect reporting
- Facilitation of tax evasion
- Unauthorised disclosure of confidential information
- Any breach of legal or professional obligation
- You believe someone is covering up wrongdoing (including any of the items noted above)

Member complaints will not normally give rise to a whistleblowing disclosure under this policy unless the matter relates to one or more of the items noted above.

HOW TO RAISE A CONCERN?

We hope that in many cases, you feel that you can speak to your line manager directly about any concerns you may have; however, if you don't feel comfortable in doing so or think they are a part of the wrongdoing, you should contact the People Team. Contact details are at the end of this policy.

We will arrange a meeting or a phone call with you as soon as possible to discuss your concern, at a location away from the office or site if you are comfortable with that. You are not required to provide evidence for us to investigate a whistleblowing disclosure but, where reasonable we do expect you to clarify any facts or circumstances and, provide information that may support an investigation. Where there is insufficient information supporting the disclosure, it may hamper our ability to investigate or, may lead to an inconclusive outcome. We will take down a written summary of your concerns and will provide you with a copy after the meeting. We also aim to give you an indication of how we propose dealing with the matter.

You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Concerns surrounding personal complaints such as those regarding career progression, pay and reward, role expectations, shift patterns, and working relationships should not be reported using this Whistleblowing Policy. Concerns of this nature should be escalated to your line manager, a more senior manager, or a member of the People Team.

If you are uncertain whether something you are concerned about falls within the scope of this policy, you should seek guidance from 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.

HOW DO WE INVESTIGATE A WHISTLEBLOWING DISCLOSURE?

We will carry out an initial assessment of the disclosure to determine the scope of the investigation. We will inform you of the outcome of our initial assessment and what steps we intend to take (as far as reasonably possible). Depending on the nature of the concern you have raised, you may be asked to participate in additional meetings should further information be needed.

If appropriate, we shall keep you updated on the progress of the investigation and its likely timescale; however, this may not always be possible where there is a need for confidentiality or doing so would breach the General Data Protection Regulations (GDPR) or other applicable national laws. Any information or update we share with you should be treated confidentially and not shared elsewhere.

As soon as practicable after the investigation concludes, we will make recommendations as to what further steps are to be taken and let you know what they are.

If you are not satisfied with the way in which we handle your concern, you should speak to a senior manager or the People Team. If you feel that your concerns have not been adequately addressed, you may contact the confidential Whistleblowing helpline provided by SeeHearSpeakUp. From time to time, we may review the concerns disclosed through our Whistleblowing platform to ensure best practices are followed internally. When doing so, we will ensure we comply with GDPR and other relevant laws.

YOUR PRIVACY MATTERS

We hope that all our team members feel comfortable and supported when raising concerns under this policy. Anonymous disclosures are difficult to investigate; however, if you wish to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

EXTERNAL DISCLOSURE

The aim of this policy is to provide an internal procedure for reporting, investigating, and rectifying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally; however, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

WE WILL PROTECT YOU

We encourage openness and support team members raising genuine concerns, even if they turn out to be mistaken. However, reports that are false and made with malicious intent will be treated under the PureGym Group's disciplinary procedures.

You should not suffer any detrimental treatment because of raising a genuine concern. If you have concerns over treatment towards you following raising a concern, contact the People Team immediately.

You must not threaten or retaliate against whistleblowers in any way. Conduct of this type may be subject to formal disciplinary action. In some cases, the whistleblower could have the right to sue you personally for compensation in the Employment Tribunal.

KEY CONTACTS

People Team	Email: hr.team@puregym.com
SeeHearSpeakUp	Helpline: 00800 9687 4357 Email: report@seehearspeakup.co.uk Website: www.seehearspeakup.co.uk/file-a-report
Protect (<i>Public independent charity</i>)	Helpline: 020 3117 2520 / (020) 7404 6609 Email: whistle@protect-advice.org.uk Website: https://protect-advice.org.uk

RESPONSIBILITY

The People Team 'owns' this policy and must ensure that all line managers and other employees who may deal with concerns or investigations under this policy, receive regular and appropriate training.

The Audit Committee has overall responsibility for this policy and the Chair of the Audit Committee is accountable for overseeing the implementation and reviewing effectiveness of this policy and actions taken in response to concerns raised under this policy.

This policy is not contractual and does not form part of any employee's contract of employment, and we may amend it from time to time.