



DW FITNESS FIRST  
MODERN SLAVERY ACT

The following statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Dave Whelan Sports Limited and Fitness First Clubs Limited's slavery and human trafficking statement for the financial year ending 31 March 2019.

### **Introduction**

At DW Fitness First we operate a zero tolerance policy towards any form of modern slavery, forced labour and human trafficking both within our organization and our supply chains. We understand the importance of the Modern Slavery Act 2015 and are committed to meeting its reporting obligations and the fulfillment of its objectives.

### **Our Structure**

DW Fitness First is a leading operator of health clubs and sports retailer in the UK. The Group trades from 149 sites across England, Wales, Scotland and Northern Ireland as well as operating a growing e-commerce division. The group employs over 3,000 people across the retail and leisure sectors, with a head office based in Wigan.

### **Our Supply Chains**

Within the retail division, the main supply chain is through the INTERSPORT Group, a buying agent. INTERSPORT Group is a member of the FTA (Foreign Trade Association) and is a participant of the FTA's Business Social Compliance Initiative. This means that the company has committed itself to, and fully integrated, the BSCI Code of Conduct. All suppliers of INTERSPORT must commit in writing to observe the social and employment standards stated within the Code. DW Fitness First is confident that its main supplier shares the same values relating to eradicating modern slavery and human trafficking.

Due to the good relationship the Group has with INTERSPORT, very few retail goods are sourced from elsewhere. As the Group deals with few suppliers, we believe we are able to identify potential risks earlier and act faster.

A 'Contractor's Handbook' has been produced by the Group, outlining the standards expected of its contractors. Contractors must also complete a pre-qualification questionnaire before commencing work. Our handbook states that if contractors do not adhere to our policies, trading with them will cease and, when necessary, they will be reported to the relevant authority. Our robust vetting procedure gives us comfort that we only engage with contractors who share our ethics. The majority of the contractors we use are based in the UK and have long established relationships with the Group, we consider this to be a relatively low risk area for our business.

When necessary, the Group uses agency staff to cover busy periods, particularly in the warehouse. We understand that this can potentially be a high risk area for modern slavery. Consequently, we use four agencies which we have good, longstanding working relationships with. These agencies are members of the Gangmasters Licensing Authority which gives us confidence that the workers are treated fairly.

### **Internal Controls and Procedures**

DW Fitness First has a number of internal policies and procedures in place which are designed to eradicate the risk of human slavery within the workforce. Before employment commences, employees must produce evidence of eligibility to work in the UK. Regular spot reviews are done of existing employees to ensure that their status has not changed.

The Group has a Whistleblowing Policy and operates a whistleblowing hotline. Employees are encouraged to report any concerns, including concerns for colleagues who may be at risk from modern slavery. The Group's policy is to investigate all concerns and take appropriate action.

To ensure a level of understanding of the risks and possible indicators of modern slavery and human trafficking, senior managers and key staff have been briefed and are encouraged to be vigilant. Although no formal modern slavery training programme is in place, we believe that the briefings are proportionate to the risk of modern slavery within our workforce.

### **Further Steps**

- We will continue to monitor and assess our supply chains and ensure compliance from our suppliers.
- We will continue to educate employees on the indicators of modern slavery and remind them of the reporting channels open to them.
- We will continue monitor and asses the need for a more formal approach to training and will act if necessary.
- We will review the effectiveness of its current policies and develop them where shortfalls are identified.

This statement was approved by the boards of directors of Dave Whelan Sports Limited and Fitness First Clubs Limited on 19 August 2019.

Martin Long  
Chief Executive

Dave Whelan Sports Limited  
Fitness First Clubs Limited