



# **MODERN SLAVERY ACT**

The following statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the slavery and human trafficking statement for Fitness First Clubs Limited ("Fitness First") for the financial year ending 31 March 2021.

## Introduction

At 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

Fitness First is a leading operator of health clubs in the UK. We operate from 45 sites across England and employ around 325 people.

## Our Supply Chains

To ensure that human trafficking and slavery is not taking place in our supply chain we have developed a 'Contractor's Handbook' that details the standards expected of our contractors. Contractors must complete a questionnaire before commencing work to ensure they understand and agree with our commitment to guaranteeing there is no forced labour or slavery within our supply chains. 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 authorities. Our robust vetting procedure gives us comfort that we only engage with contractors who share our ethics. Most of the contractors we use are based in the UK and have long established relationships with the Company; we consider this to be a relatively low risk area for our business.

## Internal Controls and Procedures

Fitness First has several internal policies and procedures in place which are designed to minimize 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 Company 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 Company'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 and supply chains.

## 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 current policies and develop them where shortfalls are identified.

