

## 15.17 GYMSHARK SUPPLY CHAIN CONFLICT MINERAL POLICY

### **PURPOSE**

Conflict minerals are minerals that are mined in areas of armed conflict and human rights abuses, predominantly in the Democratic Republic of Congo (DRC) or adjoining countries, and are sold or traded for financing armed groups. Conflict Minerals (or derivatives of these minerals) are commonly referred to as 3TG and are defined in US legislation and the OECD due diligence guidelines as:

- Tin (Cassiterite)
- Tantalum (Coltan)
- Tungsten (Wolframite)
- Gold

### **STATEMENT**

Gymshark is committed to sourcing products, materials and trims from companies that share our values around human rights, ethics, and environmental responsibility. While we do not directly purchase 3TG from any source, we will work closely with our suppliers to determine the origin of 3TG if used in any of our products.

Gymshark expects all suppliers of our products, materials, and trims to cooperate with our conflict minerals procedures. We further expect all suppliers to seek to purchase 3TG materials from sources determined not to be involved in funding conflict in the DRC region.

### **SCOPE**

This Policy applies to all parts of your company, including any affiliates and sub-contractors, which are involved in the manufacture and/or supply of goods and/or services to Gymshark. You are responsible for the dissemination, adoption, and implementation of this Policy within your company and for ensuring that your company adopts its own policies and procedures in your supply chain, the standards adopted should be as a minimum, equivalent to those standards required by Gymshark.

### **SUPPLY PARTNERS:**

- Must support the aims and objectives of the Dodd-Frank Act concerning Conflict Minerals sourcing.
- Must develop Conflict Minerals policies, due diligence frameworks, and management systems designed to prevent Conflict Minerals.
- Work to educate the manufacturers of your sourced products about Conflict Minerals.
- Stop sourcing from suppliers that make products containing Conflict Minerals or if the supplier fails to implement reasonable steps to transition to Conflict Free sources.
- Ensure that none of the products sold to Gymshark contain Conflict Minerals.
- Must promptly provide due diligence information confirming that any Conflict Minerals are responsibly sourced and maintain records in relation to their sourcing.

### **REPORTING AND REMEDIATION**

- Supply partners must promptly notify the Gymshark Sustainability Team if there is a breach of this policy.
- Supply partners must develop a plan for remediation, the cost of which will be borne by your company. Gymshark will support in the development of the remediation plan.

## **MONITORING AND REVIEW**

The implementation of this policy will be monitored through Gymshark's Shared Fitness Programme.

This policy will be reviewed annually, and any changes communicated. Any comments or queries should be directed to the Head of Sustainability.