

# MODERN SLAVERY STATEMENT

FY23-24

**GYMSHARK**



# CONTENTS

<b>1.0</b>	<b>FOREWORD FROM OUR CEO</b>	<b>03</b>
<b>2.0</b>	<b>OUR PROGRESS</b>	<b>04</b>
<b>3.0</b>	<b>OUR ORGANISATIONAL STRUCTURE</b>	<b>05</b>
<b>4.0</b>	<b>OUR GOVERNANCE</b>	<b>06</b>
<b>5.0</b>	<b>OUR SUPPLY CHAINS</b>	<b>07</b>
<b>6.0</b>	<b>POLICIES AND COMMITMENTS</b>	<b>08</b>
<b>7.0</b>	<b>DUE DILIGENCE</b>	<b>09</b>
<b>8.0</b>	<b>RISK ASSESSEMENT AND MANAGEMENT</b>	<b>10</b>
<b>9.0</b>	<b>TRAINING</b>	<b>12</b>
<b>10.0</b>	<b>PARTNERSHIP AND COLLABORATIONS</b>	<b>13</b>
<b>11.0</b>	<b>FUTURE PLANS</b>	<b>15</b>
<b>12.0</b>	<b>APPENDICES</b>	<b>17</b>

# 1.0 FOREWORD FROM OUR CEO

Our efforts outlined in this statement reflect our unwavering commitment to address and combat the grave issue of modern slavery in all its forms, both within our organisation and throughout our supply chains, as a fundamental aspect of Gymshark's commitment to be a force for good for both people and planet.

Our journey towards tackling modern slavery is an ongoing one, and we are acutely aware of the challenges we may face along the way.

However, we are equally determined to meet these challenges head-on. My Board and the Gymshark community are committed to this activity to prevent any instances of Modern Slavery or Human Trafficking within our business and our supply chains.

CEO SIGNATURE





# 2.0 OUR PROGRESS

## Key achievements in FY 23/24:

- Enhanced transparency across our entire product supply chain, by fully mapping Tiers 1 – 4.
- Through our Shared Fitness Program, we carried out 97 separate factory audits across Tiers 1 to 4, focusing on ethical, environmental & technical areas. After this, we graded each factory from A-D in these areas to support continual improvement and urgency of remediation.
- Modern Slavery training was added to our official new starter onboarding and the online mandatory training was completed by over 90% of employees.
- Shared the FLA grievance mechanism toolkit with all suppliers.
- Updated our whistleblowing policy and process which was disseminated to all internal employees and all supply chain partners.
- Implemented a brand new Environmental, Social and Governance (ESG) committee to provide business oversight and governance around ESG across the business, including key stakeholders such as the CEO & Chief Product & Supply Chain Officer.



# 3.0 OUR ORGANISATIONAL STRUCTURE

Gymshark Group Limited is the parent company of the group but does not trade.

Gymshark EU Holdings LTD was incorporated in June 2024 and acts as an intermediate holding company.

Gymshark NL B.V was incorporated in the Netherlands in June 2024 but does not yet trade.

Gymshark EU B.V was incorporated in the Netherlands in August 2024 but does not yet trade.

Gymshark Holdings LTD was incorporated in September 2016 and acts as an intermediate holding company which has never traded.

Gymshark LTD is based in the UK with headquarters in Solihull and a satellite office in London. Gymshark LTD designs, manufactures,

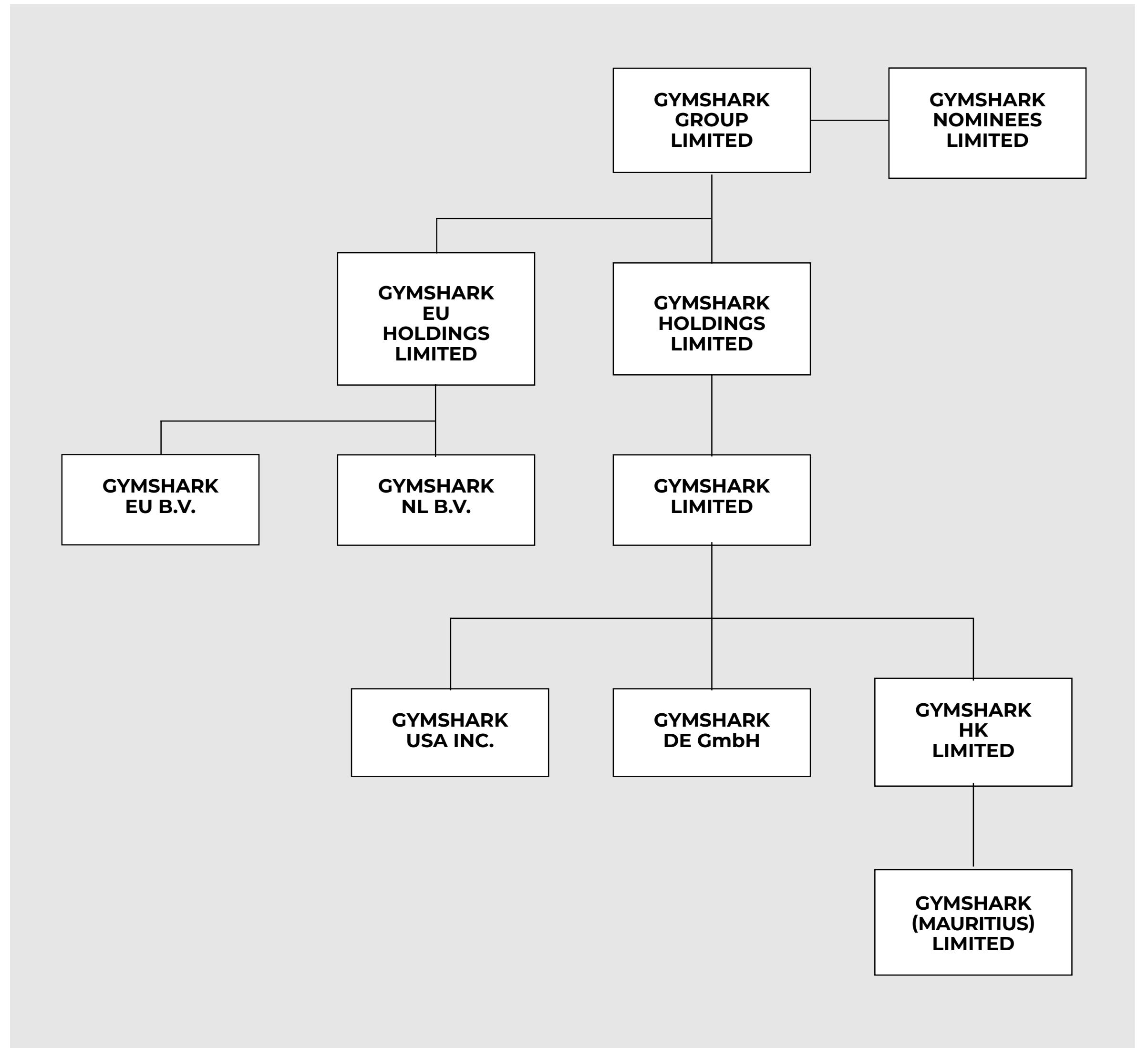
develops, markets, and sells branded gym and fitness apparel and accessories through online channels and its physical retail stores and through select wholesale partners.

Gymshark USA INC was incorporated in July 2019 in Delaware. It commenced trading in July 2021.

Gymshark DE GmbH was incorporated in 2022 but has never traded.

Gymshark HK Limited and Gymshark (Mauritius) Ltd were incorporated to act as sourcing offices based in Kowloon Bay in Hong Kong and in Mauritius respectively. The sourcing offices closed in 2023 and the legal entities will be struck off in due course.

Gymshark Nominees LTD was incorporated in and acts as vehicle for the group's E and G shareholders.





# 4.0 OUR GOVERNANCE

The statutory board of Gymshark Group Limited (GGL) has overall accountability for managing all material risks and opportunities.

The GGL statutory board is supported by the Audit and Risk Committee (ARC), a Nomination and Corporate Governance Committee, and a Remuneration Committee. The terms of reference for the ARC make it clear that Gymshark should monitor, identify, and deal with any actual or suspected human rights abuses and modern slavery in its supply chain. GGL's board of directors and sub-committees are supported by operational oversight from within the business. Operational review and decision-making are provided by Gymshark's Chiefs through monthly meetings. In addition, the Chiefs have delegated more detailed review and monitoring of compliance and risk to a committee of executives who constitute the Compliance Committee (CC). The CC meets

monthly. The CC's role within the organisation is to bring operational compliance and risk points at Gymshark into regular focus and scrutiny with a group of key stakeholders.

In February 2024 Gymshark held an inaugural ESG Committee meeting, which has since then met quarterly and will continue to do so. The ESG Committee has been established to provide business-wide oversight and governance for ESG metrics and issues. The Committee is chaired by the Chief Product & Supply Chain Officer and has a number of permanent and nominated members to ensure complete business coverage; permanent members include the CEO, Company Secretary and Director of Sustainability.





# 5.0 OUR SUPPLY CHAINS

## 1. Non-Product Supply Chain

This part of the supply chain has three core areas

- **Goods not for resale:** Products that are purchased for the purpose of running our business operations for example, marketing, brand-building, office furniture, stationery, hardware, software etc which are supplied by a range of external suppliers to the Gymshark group of companies
- **Internal contractors:** Refers to people and organisations that are engaged to

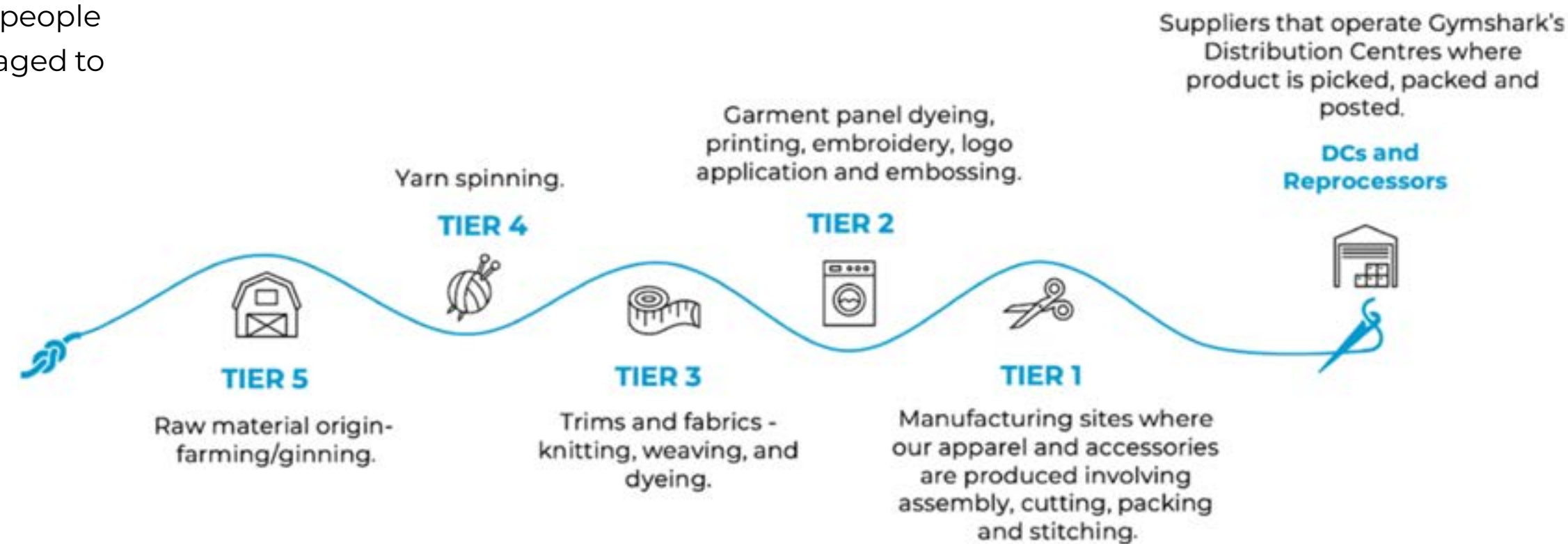
work within Gymshark's business on a temporary basis

- **Outsourcing partners:** The business contracts with third parties for special consultancy or professional services, where there is insufficient in-house expertise or where additional capacity is needed e.g. in the logistics/distribution space, some technology services, specialist HR services etc.

## 2. Product Supply Chain:

Product supply chain includes Gymshark branded products which are designed in-house, manufactured by our supply chain partner factories and sold through the Gymshark websites, retail and pop-up stores.

Our product supply chain is made up of five Tiers.





# 6.0 POLICIES AND COMMITMENTS

Gymshark has a comprehensive series of internal and external policies and procedures that ensure consistent governance and trading for our product supply chain. Our policies and procedures help maintain our commitment of prohibiting forced labour in the supply chain. These are reviewed and updated on regular basis. The specific policies related to prevent modern slavery are available in the appendices of this document.





# 7.0 DUE DILIGENCE

## Non-product Supply Chain

---

In FY23/24 we hired external contractors to review and improve how we manage our non-product supply chain. Whilst we have policies in place, we understand the need to make sure these are strengthened in line with the growth of the business, and to ensure we are only working with reputable non-product supply chain partners.

Non-product supply chain partners are expected to adhere to Gymshark's policies, Anti-Slavery & Human Trafficking and Code of Conduct, and in some cases, go through Disclosure and Barring Service checks before they are onboarded.

In addition, tender processes may include scored ESG questions and, at a minimum, suppliers are asked how they avoid modern slavery and to share their relevant policy(ies).

## Product Supply Chain

---

### Supplier Selection and Approval

To mitigate the possibility of modern slavery being present in our product supply chain, we carry out thorough due diligence before we onboard any new suppliers. Our Sourcing Team and Materials Team are responsible selecting our garment, accessories and material suppliers. Initial checks are carried out by the Sourcing Team to ensure the supplier can meet our requirements. In most cases we also endeavour to physically visit suppliers in person to better assess standards and establish communication with the suppliers prior to initiating any onboarding.

Our requirements are outlined in our Vendor Framework Agreement (VFA). The VFA details

the suppliers' obligations to uphold our Code of Conduct (COC), standards and policies setting out our expectations on worker's rights, working hours, child labour, forced labour as well as a transparent approach to continual improvement and remediation.

Gymshark requires a high level of trust and transparency from our supply chain as well as regular communication. Gymshark encourages supply chain partners to raise any concerns during development, production, or shipment with the appropriate Gymshark contact(s) as early as possible to ensure an optimum solution is found in a timely manner.

Once a business relationship is established, the potential supplier goes through a rigorous onboarding process and enters our Shared Fitness program which is on-going throughout our relationship with the supplier.

# 8.0

## RISK ASSESSEMENT AND MANAGEMENT

### Supplier Auditing – The Gymshark Shared Fitness Audit Programme

---

We continued to roll out our in-house Shared Fitness audit program. This is a crucial step in ensuring compliance and alignment with our COC and values. Shared Fitness encompasses the three fundamental pillars ethical, environment and technical. It's a core aspect of Gymshark's commitment to being a responsible business and a force for good for both people and the planet.

**Ethical:** The factory treats workers with respect and provides a safe working environment. The factory is operating per the local laws and adheres to our supplier Code of Conduct, our standards and policies.

**Environmental:** The factory is operating in accordance with local laws, with all relevant licences and permits and adheres to our environmental requirements and waste-water policy.

**Technical:** The factory is fit to make quality Gymshark product. The factory has technical ability to deliver the right product with the right quality.

All suppliers are onboarded and given guidance and training on our Shared Fitness expectations. In FY 23/24, we completed 97 Shared Fitness audits which represented 51% of our live product supply chain. Our full global supplier list can be found on Open Supply Hub and our website.

- 42 Tier 1 factories that manufactured products
- 12 Tier 2 that printed and dyed products
- 32 Tier 3 factories that provided fabrics and trims
- 11 Tier 4 Yarn Spinning



# 8.1 RISK ASSESSEMENT AND MANAGEMENT

## Action and remediation

Suppliers are provided with a grading following the audit along with a complete corrective action

plan for any non-compliances found during the audit and timelines for remediation.

AUDIT GRADING	FACTORY ACTIONS	TIME FRAME FOR IMPROVEMENTS
<b>A. Top Performing</b>	No action required	Factory audited every 2 years
<b>B. Performing</b>	Improvements required	Factory audited every 2 years
<b>C. Underperforming</b>	Actions to be closed with 9 months	Factory revisited in 9 months
<b>D. Not-performing</b>	Critical issues to be remediated immediately or Factory to be exited depending on severity	Immediate, no action will lead to exit. A review of the D grade issues is undertaken by the Product & Supply Chain senior leadership to determine the next action in terms of exiting the supplier.

We are committed to working with top performing suppliers, so all our product supply chain partners are expected to achieve a grade A or B. For any supplier that is graded C or D, our in-house Ethical team supports each facility to work on resolutions and corrective actions.

We believe in long term relationships with our product supply chain partners. However, if a supplier refuses to work on corrective actions or improve grade to an A – B, we reserve the right to exit.

If we decide to exit a supplier/factory we will strive to exit in a gradual and responsible manner to ensure minimal disruption to the supplier/factory's business and workforce. This process involves collaboration between the supplier and the Sourcing, Legal, Materials and Sustainability Teams and sending a questionnaire

to gauge any impact on the workers because of the exit process.

During FY23/24 our Share Fitness programme identified three non-compliances in relation to forced labour or modern slavery. These issues have now been resolved and we have provided support and guidance to the supplier to ensure these non-compliances do not happen/occur again. We also engaged with the supplier to ensure relevant remedy was provided to the worker, including reimbursement of owed wages.

We will continue to work closely with our third-party service providers, Arche Advisory and Qima, to make sure any instances of forced labour or modern slavery identified are immediately resolved.

# 9.0 TRAINING

## Responsible Purchasing Practices (RPP)

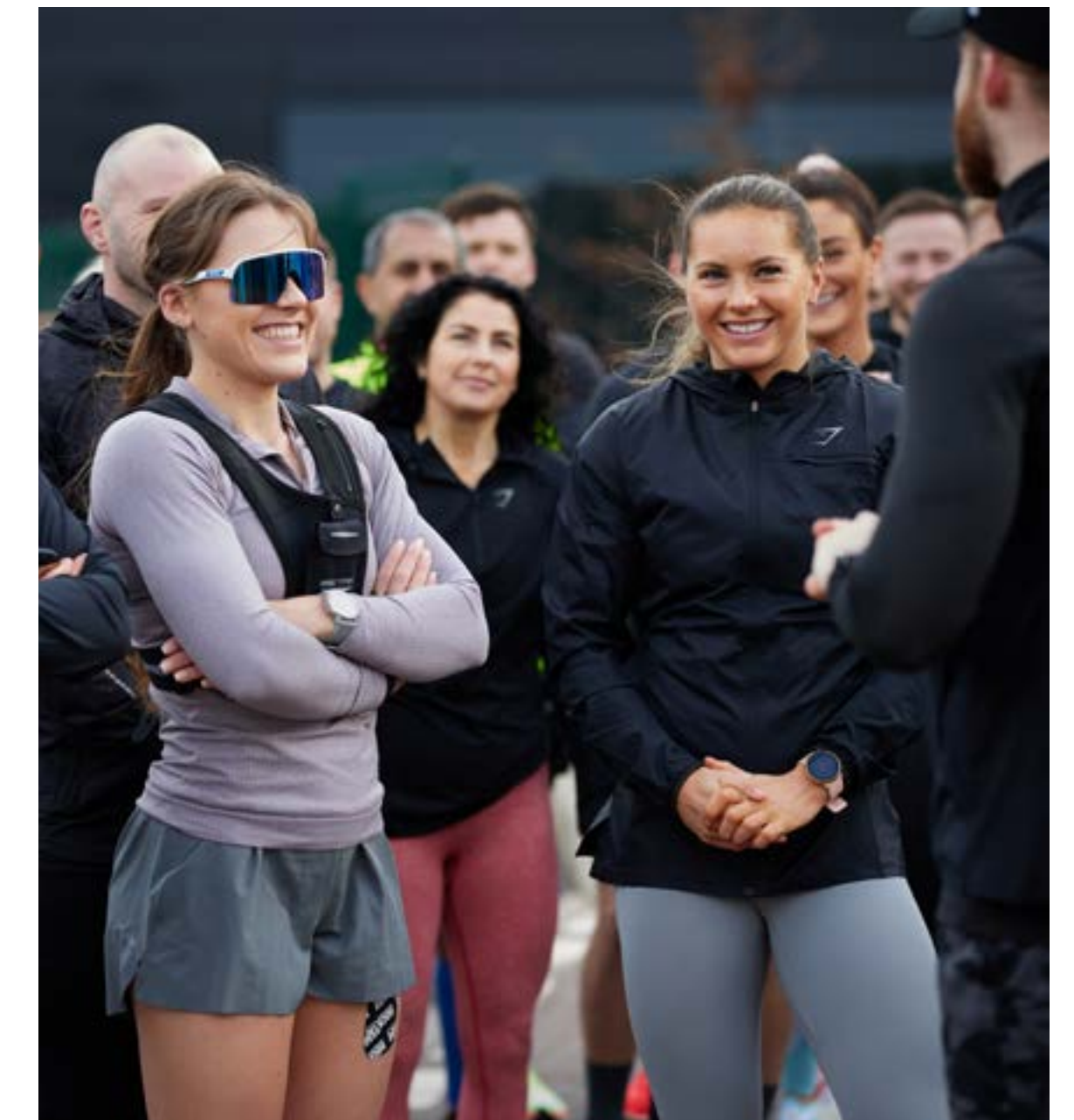
We recognise that unbalanced purchasing practices can prevent supply chain partners from upholding our code of conduct and have the potential for delayed wages to workers, forced or excessive overtime to complete orders, unauthorised subcontracting, and precarious employment. In line with the FLA requirements, we updated our policy and rolled out a new mandatory RPP training to all Gymshark's Product and Supply chain employees.

## Modern Slavery Training

Raising internal staff awareness about modern slavery remains a key focus area for us all. All new employees to the business are introduced to our work to gauge modern slavery at the time of onboarding. We require all employees to complete a mandatory online modern slavery training module. This helps to develop better understanding of modern slavery and its impacts using real and relevant examples and footage and helps our employees better understand the role they can play in helping us identify and report any indicators of modern slavery they come across in our supply chains.

## Whistleblowing

Gymshark considers it a positive act to speak up and raise concerns, our aim is to ensure employees can report legitimate concerns in confidence and be protected from any victimisation because of their disclosure. We believe an independent and confidential whistle-blowing procedure is a fundamental requirement for a responsible business. As such, we have reviewed our whistleblowing process in partnership with an external, globally recognised provider, Syntrio. We've rolled out Syntrio across our full business and taken a critical, responsible step to also provide access to our product supply chain. Utilising an external supplier gives those using the process complete confidence in the matter being handled with confidentiality regardless of their first language.





# 10.0

## PARTNERSHIP AND COLLABORATIONS

### Fair Labor Association

---

Since 1999, the FLA has helped to improve the lives of millions of workers around the world. Joining together socially responsible companies, colleges and universities, and civil society organisations, the FLA creates lasting solutions to prevent abusive labour practices. This is done by offering tools and resources to companies, delivering training to factory workers and managers, independently assessing due diligence, and pushing for greater accountability and transparency from everyone involved in global supply chains.

#### Why Partner?

Because every single person deserves safe working conditions. As part of our membership, the FLA also carries out Sustainable Compliance methodology (SCI) assessments across a random selection of our suppliers. This officially reviews our due diligence efforts and provides accountability for our commitments. You can find those reports [here](#).

#### How Does It Help?

Membership of the FLA helps us know which tools and resources we need to train our staff. It means we can verify how efficient our programmes are. It allows us to ensure we are continuously supporting efforts to protect our workers' rights.

# 10.1

## PARTNERSHIP AND COLLABORATIONS

### International Accord - Bangladesh

---

The International Accord is an independent, legally binding agreement between brands and trade unions that helps to ensure a safe and healthy readymade garment industry in Bangladesh. It also helps establish worker safety programmes in other countries that produce textiles and garments. The agreement helps to create a working environment where no worker needs to fear fires, building collapses or other workplace accidents that can be prevented with reasonable health and safety measures.

#### Why Partner?

We source some of our products from Bangladesh, so to help ensure safe working spaces for the workers there, we've become members of the Bangladesh Accord.

#### How Does It Help?

All of our Tier 1 Bangladesh supply chain factories go through a thorough inspection and audit under the Accord. All our supplier health and safety audits can be found [here](#).

### Cascale

---

Dedicated to transforming businesses for exponential impact through dynamic partnerships, industry sustainability, and trusted leadership, Cascale is a global non-profit alliance which represents multiple stakeholders in the consumer goods industry. Its mission is to create a global consumer goods sector that is in harmony with the planet and its people.

#### Why Partner?

Cascale provides us with access to an extensive network and suite of Higg tools, to better monitor fair working conditions in our supply chain.

#### How Does It Help?

Higg tools helps us track, measure, and share our progress with value chain partners, consumers, investors, and other key stakeholders.



# 11.0 FUTURE PLANS

**Although we have made improvements, we accept that there is always more that we can do and we will develop, in the next financial year, further measures to provide scrutiny and assurance of our supply chains.**

**Over the next year, we commit to:**

- Further resource our Shared Fitness programme and aim to have audited 100% of our live Tier 1 - 4 product supply chain.
- All audited factories to be graded against their performance across Ethics, Environmental & Technical areas, they are expected to achieve and maintain A or B grading through continual performance improvement and corrective action plan completion.
- Extending our product supply chain transparency efforts to farm level, Tier 5, and implement an applicable farm level social compliance audit.
- Reviewing, and updating where needed, all policies that support and help us work to prevent modern slavery within our product supply chain.
- Continuing to strengthen our organisation's knowledge and awareness of Modern Slavery and update and refresh our mandatory staff training.
- Using our Shared Fitness audit date to deliver targeted training to address specific locational risks, such as forced labour and child labour and strengthen guidance provided to our Tier 1 suppliers.
- Continuing to follow escalation process whenever we come across modern slavery indicators and act following investigations.
- Creation of a Central Procurement Team within Gymshark who will oversee and lead on GNFR procurement. This team will ensure the relevant assurance and due diligence is undertaken for key risk procurement areas.
- Partnering with a 3rd party specialist organisation to understand the GNFR supply base and drive ongoing improvement through better quality data and closer supplier relationships.





## 11.1 FUTURE PLANS

# At Gymshark community is integral to us

It is our biggest strength and the thing that drives us as a brand. For Gymshark, community also extends far past our amazing staff and customers, it also applies to those brilliant people within our Supply Chain across the world who play a role in manufacturing excellent quality, Gymshark product.

We will continue to work closely with its supply chain partners and member organisations, to raise the bar in terms of transparency and setting higher standards to protect the rights of its community.





# 12.0

## APPENDICES

**All our Product Supply Chain partners are required to review and adhere to the following policies.**

- [Gymshark Supply Chain Anti-Slavery and Human Trafficking Policy](#)
- [Gymshark Supply Chain Modern Slavery Remediation Guidance](#)
- [Gymshark Supply Chain Policy for Remediation](#)
- [Gymshark Supply Chain Child Labour and Young Workers Policy](#)
- [Gymshark Supply Chain Child Labour Remediation Requirements](#)
- [Gymshark Supply Chain Conflict Mineral Policy](#)
- [Gymshark Supply Chain Human Rights Policy](#)
- [Gymshark Supply Chain Migrant Worker Policy](#)
- [Gymshark Supply Chain Union Engagement Policy](#)
- [Gymshark Supply Chain Whistleblowing Policy](#)
- [Gymshark Supply Chain Whistleblowing Policy Remediation](#)

**This is the eighth annual statement  
Gymshark has made in accordance with The  
Commonwealth Modern Slavery Act 2018, the  
Modern Slavery Act 2015 and The California  
Transparency in Supply Chains Act 2010. The  
statement covers the financial year  
(FY) 2023-2024.**

