



# GYMSHARK REMEDIATION POLICIES

At Gymshark we have our SHARED FITNESS programme of continuous improvement, a way of working between the Gymshark group and our Supply Chain Partners to grow sustainable and successful businesses together.

Shared Fitness encompasses the three fundamental pillars of **Ethical, Environment & Technical**. For Gymshark Shared Fitness represents a world class audit to deliver our sustainability commitments.

The purpose is to assess where each Supply Chain Partner is on in their journey in embedding Gymshark's values, ethical & environmental standards and identify any challenges in their adoption. Where there are challenges, these will be faced together in partnership to reach resolution.

Gymshark recognises that Supply Chain Partners may be at different stages on embedding Gymshark's standards within their value chain in the same way that our community are on different stages of their fitness journey. The Shared Fitness Programme will adapt and flex to the different needs of our Supply Chain Partners and facilities as well as to provide the tools that help everyone become their personal best.

The policies outlined below are extracted from Gymshark's Shared Fitness manual, providing an overview of the established guidelines implemented by Gymshark.

## REMEDATION POLICIES

1. Gymshark Supply Chain Child Labour Remediation Requirements
2. Gymshark Supply Chain Modern Slavery Remediation Guidance
3. Gymshark Supply Chain Policy Remediation



## **1. GYMSHARK SUPPLY CHAIN CHILD LABOUR REMEDIATION REQUIREMENTS**

The following guidance outlines the expected best practice and requirements when remediating a finding of Child Labour and is based on the Impact Child Labour Operational Procedures Methodology, we can update these from time to time.

This guidance applies to all workers working in our supply chain regardless of their employment status or length of service, and includes permanent, temporary or casual labour, whether directly or indirectly employed.

### **PHASE ONE: IMMEDIATE ACTIONS**

If staff, workers, an auditor or any other external organisation raises a suspicion about a potential underage worker at the production site, the first thing factory must ensure is that the child is safe and does not feel in any way threatened or scared by the situation.

It is necessary to clarify the identity and age of the child by reviewing age documents and verifying that they are genuine. If they turn out to not be genuine or the worker is an underage worker, the following actions should be taken by factory management immediately on the same day:

Talk to the child in a calm manner and ask open-ended, general questions to establish a rapport. Assure them that they have done nothing wrong and are not “in trouble”. In a kind manner explain why they can’t be working.

Remove the child from the workstation and arrange a safe place for the child e.g., office room, dormitory or home.

Appoint a responsible person as a chaperone of the child (e.g. trained/ no criminal conviction).

Obtain contact details (ideally a mobile phone number) of the child’s parents/guardian, and wherever possible a home address. Contact the child’s parents/guardians and explain the situation to them.

Ensure that the child has been paid for the time worked in the factory.

Document and keep records of each Child Labour case.

If a local remediation expert is involved, inform the expert about the Child Labour case.

Provide free food and free and safe accommodation to the child until a remediation programme is operational (this can be a relatively lengthy process). In some cases, particularly for children who have migrated for work, either with or without their families, the best interim solution may be to continue to stay in the



factory dormitory (if dormitory accommodation is provided); however, this is not a desirable long-term solution.

Review all the personnel records at the workplace to identify whether there are any other child workers.

Inform Gymshark of a child labour case immediately at:  
ethicalteam@gymshark.com

## **PHASE TWO: DESIGNING A REMEDIATION PROGRAMME**

Identify and establish a remediation team. This will be made up of representatives from the factory, the Supply Chain Partner, local NGOs, the Gymshark ethical team, trade unions (if active in the factory where child labour has been found) and local experts with the experience and capacity to work with children and their families to identify appropriate solutions. The programme will be funded by the Supply Chain Partner.

The remediation team will be responsible for carrying out and documenting the following steps as well as ensuring ongoing monitoring of the programme:

Supply Chain Partners must cover the remediation costs, including education costs, any travel expenses and ongoing payment of a stipend not lower than the local minimum wage. This should continue at least until the child reaches the national minimum working age or 15 or finishes the agreed training/educational/tutoring course in the remediation programme, whichever is the longest.

Commitment from the supply chain partner/site to re-hire the child when he or she reaches legal working age, should the child and his/her parents/guardians wish it.

Consulting with the parent/guardian of each child in the design of the specific remediation programme for each child.

Explaining to the parent/guardian what is happening to ensure that they understand and agree and explaining the ongoing provision of stipend, food, and accommodation. If necessary, educate the parents about the benefits of schooling/vocational training. With younger children, the strong involvement of parents/guardians is particularly important. In cases where parents have sent their child to work, this process of persuasion may be difficult, and it is particularly important to ensure that parents are confident that the family's income will not be reduced by participating in child labour remediation.

Obtaining signed agreements from the parent/guardian of each child and all parties to the remediation setting out the elements of each child's remediation program



Payment of a stipend to the child both during the exploratory phase and throughout the whole remediation programme. The stipend should be equivalent to the amount the child was earning whilst employed, or at least local minimum wage standard, whichever is higher. The stipend should be paid in weekly or monthly, rather than as a lump sum.

A thorough investigation into the specific circumstances of each child, including family background, education history and economic circumstances. This should also include discussions with each child about their ambitions and how education can help in achieving them and meetings with parents/guardians exploring why the child was not already placed in school. If the child does not want to go to school, it is necessary to work hard to find out the reasons why.

Evaluation of whether another adult family member could be employed by the factory in the child's place. This maintains the family's income and continues the link between the factory and the family, which will make the remediation sustainable.

Identification of an appropriate school/training or tutoring facility. This should match the needs and circumstances of each child. Besides basic literacy, the education should ideally involve learning skills which will be useful in gaining good employment as an adult. If the child is close to the legal working age, vocational training can be appropriate, particularly if it enhances the earning capacity of the child when they return to work legally. The school must not be on the same site as the factory. In the case of children who are away from home/have migrated for work, with or without their families, it is important to evaluate educational/training/tutoring facilities both in the child's hometown and in the host area.

Identification of an appropriate accommodation facility. This must be a safe place and must match the needs and circumstances of each child. For children who are away from home/have migrated for work, with or without their families, the best interim solution may be for the child to remain in his or her current dwelling / continue to lodge in the factory dormitory whilst the remediation plan is developed. However, each instance will be discussed carefully by the remediation team. Long-term accommodation should not be on the factory site.

### **PHASE THREE: ONGOING SUPPORT AND MONITORING**

Ongoing support and monitoring of the progress of the remediation programme is necessary to ensure that it continues to benefit the child until he or she reaches working age. This will be carried out by remediation team and not by the factory which employed the child(ren) and will include the following:

Monitoring of the child's progress at school, exam results, school reports, discussions with teachers etc.

Home visits by an independent 'friend' (responsible person) to the child, checking in on a regular basis on their hopes, fears, and ambitions.

Regular payment of a stipend, school fees and any other expenses.



The total cost of implementation of the programme will be secured from the employer preferably as a lump sum payment. This should then be entrusted to a third party to make the payments on a regular basis.

Any questions on the above guidance should be directed to the Gymshark Sustainability Team.



## 2. GYMSHARK SUPPLY CHAIN MODERN SLAVERY REMEDIATION GUIDANCE

Gymshark recognises the responsibility that we share with our Supply Chain Partners to provide remedy to victims of modern slavery. The following guidance outlines the expected best practice and requirements when remediating a finding of Modern Slavery and is intended to provide a practical framework for Supply Chain Partners to apply remedy should they encounter victims of modern slavery in their business or in their supply chain. Successful remediation requires a victim-led, consultative, and multi-stakeholder approach.

This guidance applies to all workers regardless of their employment status or length of service, and includes permanent, temporary, or casual labour, whether directly or indirectly employed. The response to a situation of forced labour will depend upon the scale of the issue identified.

### **Phase One: Immediate actions**

If modern slavery is alleged by a victim or is observed by Gymshark or a third party, you must act quickly and to protect the victim. Protecting victims of slavery is the most fundamental principle of any remediation. If you suspect that someone is in slavery, it is essential to ensure their safety and not to create a situation that could lead to increased harm for them. You should contact your local police force or modern slavery helpline or other relevant authorities or organisations working in your jurisdiction such as their country embassy or consulate.

If safe to do so the following steps can be taken:

- Take them to a place of safety, out of view.
- Provide support either from a colleague or trade union representative.
- Provide reassurance and welfare (food, drink, medical assistance).
- Inform them of the support that is available to them and give them access to relevant government or third-party remediation services.

### **Phase Two: Remediation Procedure**

A remediation team should be formed, made up of representatives from managers of the company, trade unions (if active in the workplace), local NGOs and a Gymshark representative with expertise in modern slavery and forced labour where available. If there is an existing government or civil society-backed organisation, process or project providing remedy for victims of modern slavery in the jurisdiction then they should be identified and involved in the development of the remediation procedure.

The remediation team will work to understand the specific needs, circumstances, and aspirations of each victim and what it was that pushed them into modern slavery through the following steps:

- Identify and document relevant government and/or civil society-backed support mechanisms that victims of modern slavery can access.



- Decide and document how the Gymshark and Supply Chain Partners will contribute to programmes to assist victims of modern slavery, e.g. through vocational training or other appropriate measures.
- Identify and document the remedy the Supply Chain Partner will offer to victims of modern slavery and take steps to correct the situation for the worker which may include:
  - Restitution (restoring victim to original situation before abuses occurred)
  - Compensation (financial or otherwise)
  - Rehabilitation (medical, physiological or psychological care) and
  - Satisfaction and guarantee of non repetition (psychological support)
- Ongoing support required should be determined with the victim. It may take the form of a financial stipend whilst the victim is not working. The cost of which will be borne by Supply Chain Partner.
- Records should be maintained of what the victim is saying and making full notes of all the circumstances.
- In the case of multiple victims, they should be kept separate, spoken to individually and carefully observe the signs of suspects trying to make contact.
- If in need of a translator, an independent/telephone interpreting service should be preferred over in-person interpreters.
- All procedures must be reviewed to ensure that the root causes of any incidents of modern slavery is addressed and such event will not happen again.
- Ascertain if a supplier or labour provider is implicated, while doing this do not assume the role of law enforcement or tip-off anyone.
- Always report the allegations to relevant authorities.
- Capture evidence about the violations, using an independent third party if necessary.

Victims of modern slavery have the right to pursue other forms of remedial action at any stage beyond internal remedy mechanisms and should not be stopped from doing so.

**At all stages confidentiality must be maintained so that the victim is not exposed.**

### **Phase Three: Ongoing support and monitoring**

Ongoing support and monitoring of the progress of the remediation programme is necessary to ensure that it continues to benefit the victims of slavery.

Monitoring will include the following steps:

- Monitoring the victim's progress if the victim has been referred to a government or civil society-managed referral mechanism or similar.
- Evaluating how effective the remediation procedure was and amending it accordingly.
- Reviewing progress over a suitable time period and verifying that progress with local authorities and local organisations.
- Reviewing internal policies and procedures to determine what needs to change to prevent slavery from re-occurring.



- Building learnings into remediation procedures and operational procedures to prevent re-occurrence.

Any questions on the above guidance should be directed to the Gymshark Sustainability Team.





### **3. GYMSHARK SUPPLY CHAIN POLICY REMEDIATION**

Remediation and seeking sustainable solutions is a shared responsibility between Gymshark and our Supply Chain Partners therefore we have developed the following best practice guidance, to provide a practical framework for Supply Chain Partners to follow should they encounter any violations or non-compliances of Gymshark Policies or the Gymshark Code of Conduct.

#### **Determining the appropriate form of remedy**

Remedy can take a variety of forms, including but not limited to: an apology, rehabilitation, restitution, provisions to ensure the harm cannot recur, compensation (financial or other) for the harm, punitive sanction, cessation of a particular activity or relationship, or some other form of remedy determined by Gymshark.

#### **General principles for determining appropriate remedy:**

Engage with affected stakeholders for determination of the remedy where possible.

The remedy should seek to restore the affected person or persons to the situation they would be in had the harm not occurred (where possible) and be proportionate to the significance and scale of the adverse impact.

The remedy should meet all applicable laws and international guidelines on remediation where available; where such standards are not available, the remedy provided is consistent with that provided through similar cases.

Specific remediation requirements for child labour, modern slavery and whistleblowing have been developed in separate documents given the often challenging and sensitive nature of these issues.

#### **Remediation Procedure**

The following remediation procedure applies to all Supply Chain Partners workers regardless of their employment status or length of service, and includes permanent, temporary or casual labour, whether directly or indirectly employed.

#### **Phase One - Immediate actions:**

- Protect workers - All stakeholders involved in the process must take steps to ensure that all workers and their families are protected from harm and retaliation throughout the process. This includes putting in place non-retaliation policies and agreements, training investigators to be responsive to workers' needs, and providing workers with access to transparent, equitable and legitimate grievance mechanisms.
- Workers should be supported by a trade union representative if possible.
- Workers should continue to work in their current job.
- Workers should have the whole process explained and be clear on what will happen next.

#### **Phase Two: Designing a remediation procedure**



- Form a remediation team made up of representatives from the managers of the company, trade unions (if active) and inform a Gymshark representative of the progress.
- The remediation team will determine the best and most suitable remedy available after considering workers views.
- In a case of underpayment, the remedy should be compensation and repayment to workers as quickly and effectively as possible. If required a third party should be involved in repayment to ensure independent oversight of the whole process.
- In a case of breach of national or international law where compensation is not involved, all efforts should be made to restore the status and adherence to the law.
- In a case of breach of any principle mentioned in the Gymshark Code of Conduct, a time-bound improvement plan is required.
- Where a best practice has been breached, efforts should be made to restore the status within a given timeframe.
- Workers should be provided alternate source of raising their complaints e.g. pre-existing mechanisms to raise an issue.

### **Ongoing support and monitoring**

Gymshark will provide ongoing support and monitor the progress of the remediation programme to ensure that it continues to benefit the workers. This will include:

- Recording of the breaches
- Documenting the process followed
- Reviewing payment records
- Sharing learning internally to ensure such issues do not happen again.

Any questions on the above guidance should be directed to the Gymshark Sustainability Team.