

15.20 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.