

15.18 GYMSHARK SUPPLY CHAIN HUMAN RIGHTS POLICY

PURPOSE

Gymshark recognises its responsibility to respect the human rights of our employees, the workers in our entire value chain, our customers and the communities we operate in. We do this by striving to operate responsibly and prioritising the management of human rights linked to our business activity in our own operations and in our suppliers, using our ability to affect change through leverage and business relationships. We are committed to collaborating with our supply chain partners and other stakeholders to influence change and be part of the solution within wider industry.

STATEMENT

Gymshark recognizes that while states have the duty to protect human rights, companies should respect the same. Our approach is to implement the UN Guiding Principles on Business and Human Rights (UN Guiding Principles, with priority focus on ensuring fair labour practices, fair compensation, safe working conditions and no forced or bonded labour particularly for the most vulnerable and exploited. As a business we seek to avoid infringing the human rights of others and work to address any adverse human rights impacts we identify within our supply chain.

We take seriously any allegation of human rights abuse in all its forms and will not tolerate human rights abuse against individuals or communities within Gymshark's supply chain. We will undertake all reasonable and practical steps in relation to the breach any of our standards and policies to identify, prevent or mitigate human rights' risks and remediate any adverse impact that our operations have caused or contributed to.

This policy outlines the expected standards and steps Gymshark requires your company to implement and maintain to protect and respect the human rights of workers. It has been developed in line with the Gymshark Code of Conduct, the International Labour Organisation core conventions, the principles outlined in the Universal Declaration of Human Rights (UDHR), the UN Global Compact, and the OECD Guidelines for Multinational Enterprises.

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. In case of any queries, supply chain partners can ask for clarification.

FUNDAMENTAL PRINCIPLES

Respect for Minorities and Communities Rights

Gymshark respect the rights of local communities in such areas where it conducts its business activity, and commits to respect the local laws and culture and an undertaking to maintain an open dialogue with its stakeholders and paying special attention to the more vulnerable groups.

Right to Health

Gymshark will take reasonable and practical actions to ensure that our products are not designed to cause a hazard to the health and safety of the customers, those involved in their manufacture, or the communities around manufacturing facilities.

Contribution to the Fight Against Corruption

Gymshark is against corruption in all its forms, both direct and indirect, including extortion, bribery, pursuant to Principle 10 of the UN Global Compact. The Gymshark Global Anti-Bribery and Corruption Policy will comply with the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977.

Right to the Environment and Access to Clean and Safe Drinking Water

Gymshark will comply with the environmental laws that apply to our activities and shall make reasonable efforts to prevent the potential environmental impact created within our supply chain, in terms of the people involved in manufacturing and communities around manufacturing facilities.

Suppliers must adopt reasonable measures to mitigate negative operational impacts on the environment and strive to continuously improve environmental performance.

Labour Human Rights

There shall be no forced, bonded, indentured or involuntary prison labour, slavery or trafficking of persons. All work must be entered into freely and voluntarily.

We have a zero tolerance approach to forced or compulsory labour as defined in ILO Convention 29, our Code of Conduct and detailed in our Anti Slavery and Human Trafficking policy.

No Child Labour

We respect children's rights and do not accept any form of child labour as per ILO Convention 138, as detailed and defined in our Code of Conduct and Child Labour and Young worker policy.

No Discrimination and Diversity is Promoted

Our supply chain partners should not engage in any form of discrimination, and should respect diversity of their employees by offering equal opportunities for employment and professional promotion. No employee in the supply chain shall be subject to discrimination on the grounds of race, origin, ethnicity, disability, illness, religion, marital status, sexual orientation, political opinion and affiliation, age, citizenship, gender, gender identity, social class or any other grounds whatsoever. Our supply chain partners should refrain from engaging in any discriminatory practice with regard to the recruitment, remuneration, access to training, promotion, overtime, termination of the employment agreement or retirement of their workers in accordance with our Code of conduct and Standards and policies.

Respect for Freedom of Association and Collective Bargaining

As per the Right to Organise and Collective Bargaining Convention, 1949 (No. 98), we acknowledge the right of workers in our supply chain to set up, be involved in or join trade unions and/or organisations that defend and promote their interests, regardless of the environment where they work. This also ensures respect for collective bargaining, freedom of opinion and protection for the workers' representatives and is in line with the 1998 ILO Declaration of Fundamental Principles and Rights at Work.

Our Code of Conduct and our Union Engagement Policy stipulates in turn, that our supply chain partners shall ensure that their employees have, without distinction, the right of association and union membership. No retaliation may arise from the exercise of such right and no remuneration or payment whatsoever may be offered to the employees in order to hinder the exercise of such rights. Likewise, they shall adopt an open attitude of collaboration towards the activities of Trade Unions. Workers' representatives shall be protected from any type of discrimination and shall be free to carry out their representative functions in their workplace.

The [MNE Declaration](#) provides detailed guidance on collective bargaining in its section on industrial relations (art. 49-56) and is the expected approach to be upheld.

Protecting Workers Health and Safety

The highest level of Health and Safety standards in a factory are fundamental to protect workers from the risk of occupational hazards, accidents and toxic substances. Our Code of Conduct explicitly mentions the need and importance of providing a safe working environment. Our supply chain partners must ensure that they have the policies and systems in place to detect, avoid and respond to potential risks to health and safety in the workplace for all employees.

Favourable Working Conditions

Our supply chain partners shall ensure that all employees are treated with respect and dignity, their compensation is fair and in line with our Code of Conduct, paid on time and in accordance with statutory provisions, including minimum wages, overtime, benefits and working towards the payment of living wage.

REPORT AND REMEDIATION

Supply partners must immediately notify the Gymshark Sustainability Team if there is a breach of the fundamental principles outlined in this policy or a case of harm to workers identified via an internal audit or external visit or by any other channel.

Supply partners are responsible for providing remedy where harm or wrongdoing to workers are identified and 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, further guidance can be found in the Gymshark remediation guidance document.

MONITOR 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.