5.2 GYMSHARK SUPPLY CHAIN WHISTLEBLOWING POLICY

PURPOSE

One of Gymshark's core values is to "do the right thing". Gymshark is committed to conducting its business with honesty and integrity and expects its supply chain partners, factories and subcontractors to operate to the same high standards.
This whistleblowing policy sets out our commitments to encouraging supply chain workers to speak up about any concerns or suspected wrongdoing, with the reassurance that concerns will be taken seriously, addressed promptly, confidentially and without fear of reprisals, even if those concerns turn out to be mistaken.

STATEMENT

Employees are often the first to realise that there may be something seriously wrong within a place of work. Gymshark considers it a positive act to speak up and raise concerns and our aim is to ensure employees can report legitimate concerns in confidence and be protected from any victimisation because of their disclosure. We believe that use of a whistle-blowing procedure indicates a healthy and trusted business
Whistleblowing is when an employee report concerns of suspected misconduct, illegal practices at work, or an organisations failure to act, for example where anyone is working:

- Against their will
- Being paid less than legal wage of the country, holiday pay, statutory payment.
- Working in unsafe and dangerous conditions.
- Having deductions made not covered by law.
- Being treated unfairly or discriminated against.
- Having their personal identity documents retained.

Whistleblowing can make a valuable contribution and support the long-term success of an organization as it encourages freedom of speech and improvements that support positive change.

SCOPE

This Policy applies to all employees of your company, including anyone working at affiliates or 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.
Any grievances that relate to the company, subcontractor, internal organisation, operations and practices should be dealt with formally through your company's normal reporting channels, policies or procedures. Such issues are not covered under Gymshark's Whistleblowing Policy.

REPORTING CONCERNS

We have established a whistleblowing process to enable our supply chain partners, their employees, factories, subcontractors and other relevant stakeholders to report concerns relating to labour rights, forced labour, child labour, harassment, discrimination, unsafe working conditions, wage and hour violations, corruption, or other misconduct or potential violations of labour rights.

WE'RE LISTENING

Everyone has the right to be heard.
If you would like to speak to Gymshark directly, you may contact us anonymously and in a language of your choice through our independent reporting channel:
Online: https://report.syntrio.com/gymshark
Email: standard-reports@mitratech.com (Emails must include the company name associated with the report.)
Even if you do not have firm evidence, you should raise concerns where you reasonably believe that wrongdoing has occurred, is occurring, or is likely to occur. All reports should be made in good faith. Gymshark will review all reports received, make preliminary enquiries where appropriate, and determine whether further investigation is required. Where possible, we will communicate the outcome of our review and any resulting actions.

External Escalation

If you are not satisfied with the response provided by your facility or by Gymshark, you may also contact the Fair Labor Association Third Party Complaint mechanism at: TPC@fairlabor.org

What Information Is Required?

When making an allegation you should include as much information as you can, focusing on:

- The nature of the conduct that concerns you.
- The details of the person that you think engaged or is engaging in the conduct that concerns you.
- When and where the conduct occurred (e.g. dates and times).
- Details of anyone else aware of or involved in the conduct.
- Details of anyone else who might support or verify your allegation.
- If you have done anything in response to the conduct that concerns you.
- What supporting information that you can provide (e.g. emails, MS Word documents).

In order to fairly investigate your concern, we will ask questions to assist with our investigations, Gymshark will review the concern/incident, make preliminary enquiries and decide if further investigation is needed. We will decide whether the enquiry should be conducted internally, or the matter should be referred externally. Where possible we will advise you of the outcome of any investigations.

Anonymous Allegations

We encourage whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the investigating team. In exercising discretion to accept an anonymous allegation the following factors are taken into account:

- The seriousness of the issue raised
- The credibility of the allegation
- Whether the allegation can realistically be investigated from factors or sources other than the complainant.

Untrue Allegations

We aim to encourage openness and are committed to ensuring no one suffers any detrimental treatment because of reporting genuine concerns in good faith under this policy. Anyone who report their concerns will not be victimised or treated less favourably in anyway as a result.
If you raise a genuine concern under this policy, you will not be at risk of suffering any detriment or retaliation, nor will you be disadvantaged by speaking up whether your concern is proven or not.

GYMSHARK COMMITMENT

We will take all genuine concerns raised seriously and will investigate. We hope that you will feel able to raise any concerns openly under this policy. All allegations will be treated in confidence, and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests.
Gymshark will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved (e.g. union, other brands, supplier or factory) in the investigation/allegation.
Similarly, if the allegation results in court proceedings, then the whistleblower may have to give evidence in open court if the case is to be successful.
Under no circumstances shall a report made in good faith under this policy serve as a basis for any retaliatory actions against you for making a report.

REPORTING AND REMEDIATION

Supply partners must promptly notify the Gymshark Sustainability Team if there is a breach of this policy.
Supply partners are responsible for providing remedy where harm or wrongdoing to workers is 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.

RELATED INFORMATION

Gymshark Supply Chain Whistleblowing Policy Remediation

MONITORING AND REVIEW

Implementation of this policy is monitored through Gymshark's supply chain due diligence activities, including supplier assessments, worker engagement, grievance reviews and the Shared Fitness Programme.

This policy will be reviewed annually, and any changes communicated. Any comments or queries should be directed to the Senior Management Team.