

David Lloyd Clubs Slavery and Human Trafficking Statement 2024

At David Lloyd Clubs we are committed to ensuring that all our business operations are free from involvement with slavery or human trafficking as a responsible employer. We pride ourselves on and encourage everyone at David Lloyd Clubs to follow our core values which include 'Edge: do the right thing, not the easiest thing' and this is driven into taking a zero-tolerance approach to Modern Slavery and Human Trafficking across the business. We ensure that slavery and human trafficking is considered and addressed in our approach to corporate social responsibility.

This slavery and human trafficking statement is for the financial year ended 31 December 2024 under the Modern Slavery Act 2015. It covers the following companies which are all part of the group headed by Deuce Topco Limited.

- Deuce Topco Limited
- Deuce Holdco Limited
- Deuce Parentco Limited
- Deuce Midco Limited
- Deuce Acquisitions Limited
- David Lloyd Leisure Operations Holdings Limited
- David Lloyd Leisure Group Limited
- DLL Greenwich Limited
- David Lloyd Leisure Limited
- David Lloyd Leisure GR Limited

Introduction

Modern slavery is defined as offenses of 'slavery, servitude and forced or compulsory labour' and 'human trafficking'. It takes various forms such as slavery, servitude, force and compulsory labour, debt bondage, forced marriage and human trafficking all of which exploit someone else for the purpose of personal or commercial gain. As a result, it can refer to situation of exploitation where a person cannot refuse or leave because of threats, violence, coercion deception and/or abuse of power. It is estimated that over 40 million people are victims of modern slavery globally, with 16 million victims of forced labour in the private sector.

Our Position

We are committed to acting ethically and with integrity in all our business dealings and relationships to ensure that modern slavery is not taking place in our business or supply chains. As the leading premium health, fitness and wellness operator in Europe, with over 750,000 members and over 10,000 team members we understand the importance of keeping all individuals safe that work with and for us.

Our Business

As part of our initiative to identify and mitigate risk, all employees have a role to ensure that we are vigilant with respect to our suppliers and other employees in our business to ensure that no such activities take place. We have an Anti-Slavery Working Group in place to review progress against actions and set our agenda for the future.

Our Supply Chain

At David Lloyd Clubs, we have a sizeable Supply Chain consisting of over 4,000 suppliers providing a vast number of products and services to 100+ clubs across the UK. Our main areas of spend consist of food & beverages, laundry, contracted cleaning services, pool chemicals, testing equipment and disposables, gym & sports equipment, spa consumables, service and maintenance contracts, various uniform, and waste collections. We cooperate with all size vendors, from self-employed professionals to large global companies with procured products and services delivered from the UK or through our UK partners.

At David Lloyd Clubs, we have a zero-tolerance approach to slavery and forced labour. Modern slavery is a violation of fundamental human rights.

The Supply Chain team is responsible for ensuring that our suppliers comply with our Purchasing Terms and Conditions and our Supplier Code of Conduct. We use a matrix to identify our high-risk suppliers and categories. As an additional layer of checks in 2024, we have issued an Anti-Slavery & Human Trafficking Questionnaire with a 100% response rate.

Our People

We have over 10,000 employees working across 133 clubs, located in nine different countries within both the UK and Europe. In the UK all new starters are required to complete right to work checks upon joining David Lloyd Clubs. Once onboard, team members are provided online training which includes a compulsory module on 'Modern Slavery' to ensure they are fully aware of issues relating to slavery and human trafficking across all areas of the business. We ensure the correct safeguarding is in place by completing any DBS checks required for the role and provide copies of all policies and procedures ensuring that any concerns about slavery or human trafficking can be raised through our Speak Up Line. We regularly check that all team members are paid at least the DL minimum wage rates and ensure additional benefits or entitlements do not impact to take them below this rate. Our Slavery and Human Trafficking guidelines for our team members are outlined below. We also have an ongoing audit process in place to ensure that all team members' employment records have the appropriate right to work documentation, a valid visa (where relevant) and a copy of the employment contract.

Key Performance Indicators:

- 100% David Lloyd Clubs group executive committee members trained on Modern Slavery awareness.
- 95.71% of David Lloyd Clubs employees completed the Modern Slavery online training.
- We have had no Modern Slavery issues identified through supplier due diligence process to date.

Related Documents

There are several company documents that should be read in conjunction with this statement:

- Speak Up Line
- Personal Dignity, Respect and Belonging Policy
- Behaviour Policy
- Health and Safety Policy

- Anti-Bribery Policy
- Report a concern Policy
- Supplier Code of Conduct

Endorsement

This report has been compiled by the Supply Chain and People Team and has been authorised and approved by the Chief Executive Officer, Russell Barnes. This report is reviewed and published annually.



Russell Barnes

7th January 2025



Slavery and Human Trafficking Guidelines

What is Modern Slavery?

Modern slavery is an international crime. It can include victims that have been brought from overseas or vulnerable people in the UK, being forced illegally to work against their will in many different sectors. It includes offences relating to trafficking and slavery, aiding, abetting, or procuring forced labour or human trafficking, or being an accessory to such offences. Examples include:

- **Forced labour:** Victims are forced to work against their will.
- **Debt bondage:** Victims are forced to work to pay off debts that realistically they may never be able to.
- **Sexual exploitation:** Victims are forced to perform acts against their will.
- **Criminal Exploitation:** Victims are controlled to perform crimes such as cannabis cultivation or pick pocketing against their will.
- **Domestic servitude:** Victims are forced to carry out housework and domestic chores in private households with little or no pay.

What are the signs?

- **Physical appearance** – Signs of physical or psychological abuse, look malnourished or unkempt, or appear withdrawn.
- **Isolation** – They may seem under the control or influence of others, avoid interaction, rarely travel alone, they may be dropped off and collected from work.
- **Poor living conditions** – Several people living at the same address, at often dirty, cramped, and overcrowded accommodation.
- **Few or no personal effects** – Few identification documents or few clothes.
- **Reluctant to seek help** – They may avoid eye contact, appear frightened or hesitant to talk to strangers.

What can you do?

If you spot the signs or have any reason for concern, you should report it through one of the following channels:

- Speak to your manager or a member of the People department in the first instance.
- If this isn't appropriate or you would prefer to, please use the Speak Up Line on 0800 915 1571.
- If you are not comfortable reporting this internally within the business, call the modern slavery helpline on 0800 0121 700 or contact our Wellbeing line on 0800243458.

Slavery and Human Trafficking Actions Taken in 2024

At David Lloyd Clubs we created the Anti-Slavery Working Group with the purpose of updating the Slavery Statement annually with the action taken during the year and setting the agenda for the following year. The working group includes team members across the Supply Chain and People teams who are responsible for delivering the agenda. They meet quarterly and publish the report annually. The Anti-Slavery Working Group for 2024 includes:

- Head of Corporate Administration
- Head of UK Supply Chain
- Employee Relations Manager
- Senior Buyer
- Reward, Policy & HR Systems Manager
- Diversity, Equity & Inclusion Manager

Employees

- Risk assessment carried out for people processes across recruitment, RTW and other risk areas, checking due diligence and any gaps.
- We have a consistent practice in place to ensure that all team members have their pay paid to a bank account held in their name.
- We have conducted an initial audit of right to work documentation and set up a monthly process to ensure that all team members have the appropriate documentation saved on the electronic employment record.
- We have conducted an initial audit of visa documentation and set up a monthly process to ensure that all team members have the appropriate in date visa documentation saved on the electronic employment record.
- We have conducted an initial audit to ensure that all team members that have joined since 2020 have a copy of their employment contract saved on the electronic employment record and set up a monthly process to ensure that this is checked ongoing.
- We have reviewed the online new starter Modern Slavery training to ensure that it is up to date and covers how to spot the signs and how to report.
- We have reviewed the likelihood and risk of us employing trafficked labour to identify the need to repeat training or offer alternative training.

Supply Chain

- We have a consistent practice in place for new suppliers, including issuing our Purchasing Terms and Conditions, Supplier Code of Conduct and confirming compliance with the Antibribery Policy and Modern Slavery Act 2015.
- We have introduced a risk matrix approach to supplier management.
- We follow a process with suppliers in sectors classed as high-risk:
 - Financial / County Court Judgement monitoring
 - Request a recent copy of their Anti-Slavery Policy along with other applicable policies – e.g. Whistle Blowing, Responsible Sourcing
 - We send a Modern Slavery questionnaire to identify further potential areas of concern