

# David Lloyd Slavery and Human Trafficking Statement 2025

At David Lloyd Clubs, we are committed to operating responsibly and to ensuring that modern slavery and human trafficking have no place within our business operations or supply chains. As a responsible employer, we uphold high ethical standards and expect these to be reflected across all areas of our organisation. Our approach is guided by our core value of *Edge 'doing the right thing, not the easiest thing'* which underpins our zero-tolerance stance towards modern slavery and human trafficking.

This statement sets out David Lloyd Clubs commitment to preventing modern slavery and human trafficking within our operations and supply chains. We recognise our responsibility to act ethically and with integrity, and to implement effective systems and controls to reduce the risk of modern slavery.

This slavery and human trafficking statement is for the financial year ended 31 December 2025 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. According to the International Labour Organization, Walk Free and the International Organization for Migration, an estimated 50 million people globally were living in modern slavery in 2021.

## Our Position

David Lloyd Clubs is committed to acting ethically and with integrity across all business operations and relationships, and to taking a zero-tolerance approach to modern slavery and human trafficking within our business and supply chains.

As Europe's leading premium health, fitness and wellness operator, supporting over 800,000 members and more than 12,000 team members, we recognise our responsibility to safeguard the wellbeing, dignity and rights of everyone who works with and for us.

### **Our Business**

As part of our initiative to identify and mitigate risk, all team members have a role to ensure that we are vigilant with respect to our suppliers and other team members in our business to ensure that no such activities take place. We maintain an Anti-Slavery Working Group, which monitors progress against agreed actions and sets the strategic agenda for future initiatives.

### **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 137 clubs across the UK and Europe. 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 Europe.

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

The Supply Chain team is responsible to ensure that our suppliers comply with our Purchasing Terms and Conditions and our Supplier Code of Conduct.

### **Our People**

At David Lloyd Clubs, we employ over 12,000 people across 137 clubs in nine countries across the UK and Europe.

In the UK, all new starters undergo mandatory right-to-work checks before joining the business. Upon onboarding, team members complete a compulsory online training module: 'Modern Slavery', ensuring they are fully aware of the potential risks and indicators of slavery and human trafficking across all areas of our operations. Where applicable, we carry out safeguarding checks, including DBS checks, and provide all relevant policies and procedures so that any concerns can be raised through our whistleblowing channels.

We regularly review pay to ensure all team members receive at least the David Lloyd Clubs minimum wage, and that additional benefits or entitlements do not reduce pay below this level. Our Slavery and Human Trafficking guidelines are available to all team members, and we maintain ongoing audits to verify that employment records include the appropriate right-to-work documentation, valid visas where relevant, and signed employment contracts.

### **Key Performance Indicators:**

- 100% David Lloyd Clubs group executive committee members have completed training on Modern Slavery awareness.
- 95% of David Lloyd Clubs team members have completed the Modern Slavery online training.

### Related Documents

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

- Whistleblowing Policy
- Personal Dignity, Respect and Belonging Policy
- Behaviour Policy
- Health and Safety Policy
- Anti-Bribery 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**

04/02/2026



## 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 Team in the first instance.
- If this isn't appropriate or you would prefer to, please use the Whistle Blow contact 01707 289870 or [reportaconcern@davidlloyd.co.uk](mailto:reportaconcern@davidlloyd.co.uk) or Speak Up Line 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 2025

During 2025 we have maintained our 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 2025 includes:

- Head of Corporate Administration
- Head of Procurement and Supply Chain
- Employee Relations Manager
- Reward, Policy & HR Systems Manager
- Diversity, Equity, Inclusion & Wellbeing Manager

During 2025, the Anti-Slavery Working Group recognised the opportunity to strengthen our approach by partnering with an expert third-party organisation to prevent and mitigate modern slavery risks across our operations and supply chain. Following discussions with several external organisations, we are pleased to announce our partnership with Slave Free Alliance (SFA). SFA is a global organisation that will provide expert guidance and advice, as well as conduct an internal gap analysis to ensure that David Lloyd Clubs aligns with best practice standards in tackling modern slavery and human trafficking. Further to this, we will work with Slave Free Alliance to introduce a Human Rights Policy within the first year of our partnership.

### Employees

- We introduced a new HR system in 2025 to assist with recruitment and onboarding processes, working with an external provider 'Zinc' for Right to Work checks whilst continuing to conduct face to face verification internally of all team members documentation when joining the business. The system processes mitigate any risk of not obtaining this documentation and conducting the required checks during onboarding as team members must provide this document electronically as a mandatory system step.
- 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.
- Our club admins centrally monitor and maintain the club's HR processes for the team members. The system enables them to conduct regular checks and receive alerts for expiring visas to take action with the team member.
- We conduct monthly auditing of right to work documentation centrally to ensure that all team members have the appropriate documentation saved on the electronic employment record.
- We conduct monthly audit of visa documentation to ensure that all team members have the appropriate in date visa documentation saved on the electronic employment record.
- All contracts are now provided electronically through the HR system; team members can provide electronic signatures and are then automatically stored on the team members electronic employment record.
- We conduct monthly 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.

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- Mandatory training of our eLearning Modern Slavery module is required by all team members as part of their induction process.

#### 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 continuously improve our risk management tools and processes to supplier management:
  - Financial / County Court Judgement monitoring
  - Requesting recent copies of their Anti-Slavery Policy along with other applicable policies – e.g. Whistle Blowing, Responsible Sourcing