



DW FITNESS FIRST
MODERN SLAVERY ACT

The following statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Dave Whelan Sports Limited and Fitness First Clubs Limited's slavery and human trafficking statement for the financial period ending 31 March 2018.

INTRODUCTION

At DW Fitness First we operate a zero tolerance policy towards any form of modern slavery, forced labour and human trafficking both within our organization and our supply chains. We understand the importance of the Modern Slavery Act 2015 and are committed to meeting its reporting obligations and the fulfillment of its objectives.

OUR STRUCTURE

DW Fitness First is a leading operator of health clubs and sports retailer in the UK. The Group trades from 155 sites across England, Wales, Scotland and Northern Ireland as well as operating a growing e-commerce division. The group employs over 3,000 people across the retail and leisure sectors, with a head office based in Wigan.

OUR SUPPLY CHAINS

Within the retail division, our main supply chain is through the INTERSPORT Group, a buying agent. INTERSPORT Group is a member of the FTA (Foreign Trade Association) and is a participant of the FTA's Business Social Compliance Initiative. This means that the company has committed itself to, and fully integrated, the BSCI Code of Conduct. All suppliers of INTERSPORT must commit in writing to observe the social and employment standards stated within the Code. DW Fitness First is confident that its main supplier shares the same values relating to eradicating modern slavery and human trafficking.

Due to the good relationship the Group has with INTERSPORT, very few retail goods are sourced from elsewhere. As the Group deals with few suppliers, we believe we are able to identify potential risks earlier and act faster.

A 'Contractor's Handbook' has been produced by the Group, outlining the standards expected of its contractors. Contractors must also complete a pre-qualification questionnaire before commencing work. Our handbook states that if contractors do not adhere to our policies, trading with them will cease and, when necessary, they will be reported to the relevant authority. Our robust vetting procedure gives us comfort that we only engage with contractors who share our ethics. The majority of the contractors we use are based in the UK and have long established relationships with the Group, we consider this to be a relatively low risk area for our business.

When necessary, the Group uses agency staff to cover busy periods, particularly in the warehouse. We understand that this can potentially be a high risk area for modern slavery. As a result we use three agencies which we have good working relationships with. These agencies are members of the Gangmasters Licensing Authority which gives us confidence that the workers are treated fairly.

INTERNAL CONTROLS AND PROCEDURES

DW Fitness First has a number of internal policies and procedures in place which are designed to eradicate the risk of human slavery within the workforce. Before employment commences, employees must produce evidence of eligibility to work in the UK. Regular spot reviews are done of existing employees to ensure that their status has not changed.

The Group has a Whistleblowing Policy and operates a whistleblowing hotline. Employees are encouraged to report any concerns, including concerns for colleagues who may be at risk from modern slavery. The Group's policy is to investigate all concerns and take appropriate action.

To ensure a level of understanding of the risks and possible indicators of modern slavery and human trafficking, senior managers and key staff have been briefed and are encouraged to be vigilant. Although no formal modern slavery training programme is in place, we believe that the briefings are proportionate to the risk of modern slavery within our workforce.

FURTHER STEPS

We will continue to monitor and assess our supply chains and ensure compliance from our suppliers. We intend to review our larger suppliers' modern slavery statements to give us assurance that they are doing enough to eradicate slavery from their supply chains.

We will continue to educate employees on the indicators of modern slavery and remind them of the reporting channels open to them. We will continue monitor and asses the need for a more formal approach to training and will act if necessary.

The Group will review the effectiveness of its current policies and develop them where shortfalls are identified.

Martin Long
Chief Executive Officer

Dave Whelan Sports Limited
Fitness First Clubs Limited

1 May 2018