

Policy Owner: Reward & HR Policy Manager
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Slavery and Human Trafficking Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, force and compulsory labour and human trafficking, all of which exploit someone else for the purpose of personal or commercial gain.

Our position

David Lloyd Clubs have a zero-tolerance approach to modern slavery and 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.

Our Supply Chain

As a business, David Lloyd has taken certain steps to ensure that slavery and human trafficking is not taking place in any of our supply chains. It is the responsibility of the Supply Chain team to ensure that our suppliers are aware of our purchasing terms and conditions and our supplier code of conduct.

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.

Our People

All new starters are required to complete a compulsory online training module on 'Modern Slavery'. Our Slavery and Human Trafficking guidelines for our team members are outlined below.

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 HR department in the first instance
- If this isn't appropriate or you would prefer to, please use the Whistle Blow contact
- If you are not comfortable reporting this internally within the business, call the modern slavery helpline on 0800 0121 700 or contact our Employee Advice line on 0800 030 5182