

Modern Slavery Statement

Fettle Group Pty Ltd | ACN 648 441 258

Financial Year ending 30 June 2025

Introduction

This Modern Slavery Statement is made by Fettle Group Pty Ltd (ACN 648 441 258), the parent entity of each other entity listed in Annexure A (together, **Fettle Group**) in respect of the financial year ending 30 June 2025. This statement is made by Fettle Group Pty Ltd on its own behalf and for Fettle Group in accordance with section 16 of the *Modern Slavery Act 2018* (Cth).

Modern slavery encompasses serious forms of exploitation, including forced labour, debt bondage, human trafficking, deceptive recruitment and practices that coerce or threaten individuals resulting in the loss of freedom and basic human rights. Within the fitness industry, risks can arise across supply chains and operations, particularly in areas such as the procurement of uniforms and equipment, cleaning and maintenance services, labour hire arrangements, and international manufacturing of apparel, supplements and gym equipment.

Vulnerabilities may be heightened where low-skilled, migrant or temporary workers are engaged through third-party contractors, suppliers and service providers, increasing the potential for exploitative conditions to go unnoticed.

Fettle Group recognises these risks and is committed to acting ethically and with integrity in all of its business dealings and relationships.

This Statement provides information about the Fettle Group business operations and plans to identify, monitor, manage and reduce modern slavery risks in its business operations and supply chains.

Reporting Entity

Fettle Group Pty Ltd is the reporting entity for this Modern Slavery Statement, having its annual consolidated revenue exceeding \$100 million in the period of 1 July 2024 to 30 June 2025 (**Reporting Period**).

Organisational Structure, Operations and Supply Chain

Organisational Structure

Fettle Group Pty Ltd is privately owned by three shareholders:

- (i) Starcat Investments Pty Ltd as trustee for The Mav Trust;
- (ii) The Percy Group Pty Ltd as trustee for Holder Family Trust; and
- (iii) The #1 Nautilus Fitness and Racquets Centres Group Inc.

The remaining Fettle Group entities are wholly owned subsidiaries of Fettle Group Pty Ltd and therefore are under the control of the Fettle Group Pty Ltd board. Fettle Group entities share common staff and management.

Operations

Fettle Group owns the Australian fitness brand Revo Fitness, which was founded by Andrew Holder in 2012, and its primary commercial activity is operating fitness centres across Australia.

Revo Fitness is the largest independent gym operator in the Western Australian market, with fitness centres also operating in New South Wales, South Australia and Victoria. Revo Fitness operates 70 fitness centres with 34 in WA, 20 in VIC, 13 in SA and 3 in NSW.

Revo Fitness has been built on the foundation of scalable systems, sustainable growth and its mission is to make quality fitness more affordable and accessible to all by creating a gym environment that encourages a healthy relationship with every member's fitness and lifestyle goals.

We believe in keeping memberships simple and straightforward, with no lock in contracts, sign up fees or hidden costs. We offer a welcoming gym environment with luxe fit outs, state of the art equipment, large open plan functional fitness areas and self-led workouts available 24 hours a day.

Fettle Group's corporate head office is located in Claremont, Western Australia with a secondary head office in Melbourne, Victoria. In addition to its head offices and fitness centres, Fettle Group has two warehouses located in Port Adelaide, South Australia and Mirrabooka, Western Australia.

Fettle Group employs over 500 employees across its two head offices, 70 fitness centres and two warehouses.

Supply Chain

Fettle Group is committed to conducting its business ethically and with integrity, including continually assessing and improving its practices to address the risks of modern slavery in its business, guided by our core values:

- We keep it simple.
- We believe in raising the bar.
- We do what we do well.
- We care about our people.
- We're all about the experience.

Procurement is conducted through the below Fettle Group entities:

Entity	Procurement
Fettle Group Pty Ltd	Engages contractors, suppliers and service providers to provide goods and services.
RevoFit Pty Ltd as trustee for The NewFit Unit Trust	Engages contractors, suppliers and service providers to provide goods and services, plant and equipment and to undertake capital works.
Holder Group Pty Ltd as trustee for Revo Fitness Unit Trust	Employs staff for Fettle Group.
Peak Vending Pty Ltd	Engages contractors, suppliers and service providers to provide goods and services, plant and equipment relating to vending machines in Revo Fitness gyms.
Revo Merchandise Pty Ltd	Acquires merchandise related goods and services for Revo Fitness.

During the Reporting Period, Fettle Group engaged 621 suppliers to provide a range of goods and services, works, plant and equipment and material to support our operations.

Our suppliers are predominantly from the following sectors:

- (i) **Construction and facility maintenance**
Revo Fitness is in a high growth phase of operation, with a number of new gym projects in the pipeline. Fettle Group engages a range of contractors and suppliers to support in the design and development of the new sites, including design consultants, planning consultants and building contractors. Fettle Group Pty Ltd also engages a range of contractors and suppliers to undertake facility and equipment maintenance within its gyms including cleaning contractors and trades.
- (ii) **Technology**
Fettle Group procures a range of technological hardware (including laptops, cabling and telecommunications equipment) for use by its employees and within Revo Fitness gyms. Fettle Group also procures enterprise software to support and scale business operations.
- (iii) **Equipment**
As part of the new site projects, and ongoing refresh and maintenance of existing Revo Fitness gyms, Fettle Group procures gym equipment and building materials. Fettle Group also requires that its constructions contractors source building materials for new site projects and refurbishments.

- (iv) **Food and beverage products**
Fettle Group procures food and beverage products to stock vending machines in Revo Fitness gyms.
- (v) **Cleaning**
Contractors are engaged by Fettle Group to provide cleaning services within Revo Fitness gyms and head offices.
- (vi) **Marketing**
Fettle Group engages a range of contractors and suppliers to provide goods and services related to marketing the Revo Fitness brand, including marketing agencies, content creators and branded merchandise for sale through vending machines in Revo Fitness gyms and online.
- (vii) **Other low value procurement items**
Fettle Group procures a range of other items including clothing (such as uniforms) and office consumables.

The majority of our material suppliers are Australian based companies, with some material suppliers in the technology and equipment sectors based overseas in higher risk regions such as Poland, Vietnam, China, South Korea and the United States of America.

Risks of Modern Slavery Practices

Fettle Group acknowledges that the risk of Modern Slavery practices is increased in certain sectors and geographical jurisdictions within its supply chain and is committed to identifying and addressing these risks to ensure that its supply chain remains free from any form of Modern Slavery.

During this Reporting Period, we reviewed our supply chains and operations to identify the key Modern Slavery risk areas associated with our industry that could potentially arise in Fettle Group's operations.

During this assessment process, we identified areas with the lowest risk, being local operations carried out by staff directly employed by Fettle Group. We identified areas with higher risk as local suppliers with low skilled, migrant or temporary workers such as cleaning service providers, and overseas suppliers of merchandise and equipment.

Actions to Address Modern Slavery Risk

To identify and understand modern slavery risks in our business during this first Reporting Period, we have conducted preliminary risk assessments and implemented operational processes within our operations and supply chains.

These assessments and processes include:

- **Modern Slavery Working Group** – We have formed a dedicated working group and commenced consultation with relevant stakeholders to assess and develop our Modern Slavery mitigation strategies across Fettle Group.
- **Supply chain review** – We have undertaken a review of our existing suppliers and supply chains to gain visibility into the various external factors involved in our operations, in order to identify potential areas of vulnerability and priorities in ongoing due diligence operations.
- **Supplier due diligence** – We have implemented internal processes to strengthen our supplier due diligence, including the onboarding of new suppliers being subject to review and approval by members of the Revo Fitness Executive.
- **Supplier onboarding** – We have implemented a Supplier Code of Conduct which all suppliers are bound by following onboarding and issuing of purchase orders. The Code of Conduct expressly prohibits suppliers from using Modern Slavery business practices and assists Fettle Group in undertaking ongoing due diligence of its supply chains by requiring its suppliers to identify and mitigate Modern Slavery risks in their own supply chains.
- **Modern Slavery Compliance Plan** – We have developed a framework to assist in assessing and implementing Modern Slavery risk and mitigation strategies, including the planned development of a formal Modern Slavery Policy, updates to existing policies (such as Fettle Group's Whistleblower Policy, and engagement of a formal Whistleblower hotline for reporting of improper business and accounting practices within Fettle Group) and development of training.

Effectiveness of Actions

As this is Fettle Group's first Reporting Period, our focus was to gain a better understanding of Modern Slavery risks across Fettle Group's operations and supply chains, and to identify risk treatments and process improvements.

At this stage, we have not been in a position to fully assess the effectiveness of the measures we have undertaken during this Reporting Period. However, we have commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

Based on our initial review, it appears that our implementation of a Supplier Code of Conduct has been effective, with the majority of our suppliers accepting the terms without issue.

Consultation

During the Reporting Period, Fettle Group Pty Ltd implemented a dedicated working group and commenced consultation with relevant stakeholders for each of the Fettle Group entities covered by this Statement and entities we own or control in order to assess and develop our Modern Slavery mitigation strategies. We carried out consultation with members of the Revo Fitness Executive Team, namely the Chief Financial Officer, Chief Operating Officer and Chief People and Culture Officer, as well as our inhouse Legal team.

Fettle Group's actions during this first Reporting Period have been guided by advice from external consultants, having regard to the requirement to identify and assess Modern Slavery risk as an initial step in the process.

Future Initiatives

In accordance with Fettle Group's Modern Slavery Compliance Plan, we intend to:

- Develop formal Modern Slavery policies and procedures in line with our Plan.
- Strengthen our due diligence processes for new and existing suppliers to assess their Modern Slavery risks.
- Develop and provide training to employees, contractors and suppliers on identifying and Mitigating Modern Slavery risk.
- Establish a grievance mechanism, in addition to our existing Whistleblower mechanism, for reporting suspected Modern Slavery Practices.
- Conduct regular risk assessments to identify potential modern slavery risks in our operations and supply chains and monitor compliance with our Supplier Code of Conduct, including by way of audits and site visits.
- Take appropriate remedial action if Modern Slavery practices are identified, including terminating business relationships if necessary.

Board Approval

This Modern Slavery Statement was approved by the board of directors of Fettle Group Pty Ltd behalf of itself and as the parent entity for each of the Fettle Group entities covered by this Statement on 22 December 2025 and is signed by Andrew Holder, Managing Director.



Andrew Holder

Managing Director, Fettle Group Pty Ltd

24 December 2025

Annexure A – Fettle Group entities

The companies and trusts within Fettle Group are identified below:

Entity	Role
Fettle Group Pty Ltd (ACN 648 441 258)	Head Company
RevoFit Pty Ltd (ACN 626 924 712) in its personal capacity and as trustee for The NewFit Unit Trust (ABN 45 892 139 546)	Fully owned subsidiary of Fettle Group Pty Ltd, trustee operates Revo Fitness gyms
Holder Group Pty Ltd (ACN 155 119 403) in its personal capacity and as trustee for Revo Fitness Unit Trust (ABN 90 953 729 745)	Fully owned subsidiary of Fettle Group Pty Ltd, trustee employs staff for Fettle Group
Peak Vending Pty Ltd (ACN 662 761 702)	Fully owned subsidiary of Fettle Group Pty Ltd, undertakes vending operations
Revo Merchandise Pty Ltd (ACN 667 861 396)	Fully owned subsidiary of Fettle Group Pty Ltd, undertakes merchandising operations
Revo Management Co Pty Ltd (ACN 681 882 520)	Fully owned subsidiary of Fettle Group Pty Ltd, services entity
HIITFIT Holdings Pty Ltd (ACN 636 216 969)	Fully owned subsidiary of Fettle Group Pty Ltd, owns HIITFIT patent
Revo Holdings #2 Pty Ltd (ACN 687 175 515)	Fully owned subsidiary of Fettle Group Pty Ltd, holds business assets
R Fit Holdings Pty Ltd (ACN 633 997 190)	Fully owned subsidiary of Fettle Group Pty Ltd, holding entity
ACN 640 226 562 Pty Ltd (ACN 640 226 562)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #1 Pty Ltd (ACN 656 730 684)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #2 Pty Ltd (ACN 656 730 620)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #3 Pty Ltd (ACN 656 730 531)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #4 Pty Ltd (ACN 656 730 040)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #5 Pty Ltd (ACN 657 748 895)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #6 Pty Ltd (ACN 657 749 034)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #7 Pty Ltd (ACN 657 749 052)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #8 Pty Ltd (ACN 657 749 061)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #9 Pty Ltd (ACN 657 749 070)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #10 Pty Ltd (ACN 658 321 941)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #11 Pty Ltd (ACN 658 321 987)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #12 Pty Ltd (ACN 658 723 712)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #13 Pty Ltd (ACN 669 687 932)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #14 Pty Ltd (ACN 681 453 341)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity
Revo Property Co #15 Pty Ltd (ACN 681 453 467)	Fully owned subsidiary of Fettle Group Pty Ltd, leasing entity