



**FITNESS &  
LIFESTYLE  
GROUP**

# Modern Slavery Statement

Financial Year 2024

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*Goodlife.*  
HEALTH CLUBS

**F** Fitness First

**jetts**  
24 hour fitness

**zap**  
FITNESS 24/7

**BARRY'S**



**Reporting Entity**

Fitness & Lifestyle Group Bidco Pty Ltd

**Australian Business Number**

88 613 738 408

**Registered Address**

176 Montague Road, South Brisbane QLD 4101, Australia

**Website**

[www.fitlg.com](http://www.fitlg.com)

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# Introduction

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Modern slavery is a crime and a violation of fundamental human rights. Fitness and Lifestyle Group (FLG) fully supports and endorses the *Modern Slavery Act 2018* (Cth) and has a zero-tolerance policy for practices related to modern slavery.

FLG recognises the importance of addressing modern slavery risk within its operations and supply chain, acknowledging the severity of its impacts and committing to focus on increasing transparency and improving its responsible business practices.



# Criteria 1: Reporting Entity

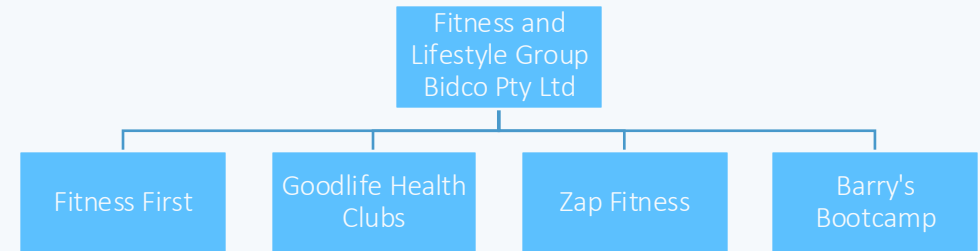
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This is the fifth Modern Slavery Statement (“the Statement”) issued by Fitness & Lifestyle Group Bidco Pty Ltd (“FLG”) and covers the period 1 July 2023 to 30 June 2024 (“Reporting Period”). The Statement has been prepared in accordance with the requirements of the Australian *Modern Slavery Act 2018 (Cth)* (Act).

This is a joint statement which has been prepared in consultation with FLG’s wholly owned Australian based subsidiaries including:

- Fitness First Australia Pty Ltd trading as Fitness First
- Goodlife Operations Pty Ltd trading as Goodlife Health Clubs
- Dockvest Pty Ltd trading as Zap Fitness
- Barry's Bootcamp Australia Pty Ltd trading as Barry’s Bootcamp

(collectively referred to herein as “**FLG Reporting Entities**” or “**we**”, “**us**”, “**our**”).





## Criteria 2:

# Operations & Supply Chain

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### Operations

FLG is Asia Pacific's leading health & wellness group, with headquarters in Australia, as well as regional offices in New Zealand and across South East Asia. FLG endeavours to make a meaningful, positive impact in people's lives through innovative and diversified health and wellness offerings across physical and digital platforms.

FLG's portfolio of globally recognised brands includes Fitness First Australia, Goodlife Health Clubs Australia, Barry's Bootcamp Asia-Pacific, Jetts Fitness, Zap Fitness, and California Fitness & Yoga. With over 360 locations spreading across Australia, New Zealand and South-East Asia, FLG helps over 700,000 members live healthier and more active lives.

### Supply Chain

FLG has a diverse supply chain and procures a range of goods and services from both domestic and international markets. During the Reporting Period, FLG Reporting Entities engaged directly with 1,261 tier one level suppliers. The geographical locations of these suppliers includes:

- 95.8% from Australia; and
- The remaining 4.2% of goods and services were procured from outside Australia.

FLG Reporting Entities mainly procure in the sectors of construction, property maintenance, cleaning services, fitness equipment, technology and marketing.



## Criteria 3:

# Risks of Modern Slavery Practices

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### Operations

FLG recognises modern slavery can occur within its supply chain, as well as in its own operations.

In the Reporting Period, FLG directly employed just over 4,886 employees in Australia and 2,067 contracted personal trainers.

FLG Reporting Entities utilise various controls to manage the risk of modern slavery within its workforce, and contractor population. FLG Reporting Entities engage employees via enterprise agreements, Modern Awards, and contracts underpinned by the *Fair Work Act 2009* (Cth) or National Employment Standards.

The internal recruitment function at FLG is centralised for support office employees and decentralised for in-club roles. Reputable recruitment agencies are engaged on an ad hoc basis to provide additional support. This structure enables FLG Reporting Entities to maintain oversight and control over recruitment practices, reducing the risk of modern slavery within the organisation. To further mitigate these risks, FLG Reporting Entities conduct regular audits of visa terms, visa holder working restrictions, and employee working hours.



## Criteria 3:

# Risks of Modern Slavery Practices

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### Supply Chain

FLG assesses supply chain risks based on geographical location, industry, and product types. Within the first tier of FLG Reporting Entities' supply chain, only 4% of goods and services are directly sourced from international regions. While FLG acknowledges that international sourcing may carry a higher risk of modern slavery, the majority of goods and services procured by FLG Reporting Entities come from countries with a lower inherent risk of modern slavery.

In terms of product and industry risk, FLG Reporting Entities' have identified areas of its supply chain that may pose a higher risk of modern slavery. These include goods and services pertaining to:

- technology;
- construction;
- food and beverage products;
- property maintenance;
- cleaning services;
- fitness equipment;
- marketing, including branded merchandise; and
- garments including uniforms.

FLG's Reporting Entities recognise the depth and potential impact of its direct and indirect supply chain. FLG Reporting Entities' endeavour to improve its ability to implement its risk management initiatives beyond tier level one over time.





## Criteria 4:

# Actions to Address Modern Slavery Risk

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In the 2024 financial year, FLG Reporting Entities implemented several measures to assess and mitigate the risk of modern slavery within their operations and supply chain.

### **Policies & Procedures**

FLG has established robust policies and procedures to guide internal operations and supplier engagements. During the reporting period, key policies were reviewed to ensure compliance with the Modern Slavery Act, including:

- **Procurement Policy:** Governs ethical and responsible purchasing practices.
- **Whistleblower Policy:** Provides clear reporting mechanisms for modern slavery and other ethical concerns.
- **Employee Code of Conduct:** Outlines expected behaviors and standards related to ethical practices, including modern slavery.

These updates strengthen grievance mechanisms, enabling employees, contractors, and suppliers to raise modern slavery-related concerns with greater clarity and confidence.

### **Procurement Processes & Contractual Arrangements**

FLG Reporting Entities have integrated modern slavery expectations into their procurement and supplier management processes, including:

- **Tender Documentation:** Incorporates specific requirements for addressing modern slavery risks.
- **Supplier Onboarding:** Assesses compliance with modern slavery commitments during the onboarding process.
- **Contractual Agreements:** Modern slavery obligations are embedded into contractual terms, including FLG's Standard Purchase Order Terms and Conditions.

Suppliers are required to approve purchase orders detailing the agreed specifications, quantities, and prices before providing goods or services. These measures ensure a consistent approach to upholding ethical practices and mitigating modern slavery risks across the supply chain.



## Criteria 4:

# Actions to Address Modern Slavery Risk

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### **Training**

During the reporting period, FLG implemented a new Learning Management System (LMS) to enhance employee training initiatives. As part of our commitment to addressing modern slavery, we plan to introduce targeted training modules in FY25. These modules aim to increase employee awareness of modern slavery risk factors and equip them with the knowledge to identify and respond effectively to potential issues or concerns.

### **Supplier Due Diligence**

Throughout the reporting period, FLG Reporting Entities continued to use the Supplier Assessment Questionnaire (SAQ) as a tool to identify modern slavery risks and evaluate supply chain risk management practices. While completion of the SAQ is not yet mandatory, we recognize the importance of comprehensive supplier engagement and plan to focus on improving completion rates in the coming year.

### **Collaboration**

During the reporting period, FLG's Reporting Entities engaged with an industry association to explore collaborative opportunities addressing modern slavery. We plan to revisit and advance these discussions to strengthen collective efforts in mitigating modern slavery risks across the industry.



## Criteria 5: Effectiveness of Actions

In the previous reporting period, FLG Reporting Entities planned several key initiatives in response to the Act. FLG Reporting Entities were able to achieve the following:

<b>Governance</b>	<ul style="list-style-type: none"><li>• Review outcomes from FY23 and improve/change Modern Slavery Framework as required</li><li>• Monitor and Update where required the policy &amp; code of conduct documents to incorporate modern slavery procedures</li><li>• Continue to monitor recruitment practices to manage modern slavery risks</li><li>• Continue to ensure modern slavery expectations are included in new contracts &amp; documentation</li></ul>	
<b>Supply Chain Transparency</b>	<ul style="list-style-type: none"><li>• Continue to risk assess tier 1 suppliers with a high inherent risk of modern slavery (geographic, industry &amp; product risk)</li><li>• Explore other risk management controls including supplier site audits</li><li>• Continue to update template of responses to questionnaires requested of FLG as a supplier</li></ul>	
<b>Collaboration</b>	<ul style="list-style-type: none"><li>• Collaborate with Non-Government Organisations (NGO's) as well as industry peers (i.e. AUSactive, other health &amp; fitness companies, and/or other reporting companies) where beneficial to FLG's response to Modern Slavery</li></ul>	FY25
<b>Awareness</b>	<ul style="list-style-type: none"><li>• Rollout mandatory modern slavery training for FLG team members and raise awareness of modern slavery internally</li><li>• Create factsheets on modern slavery for employee and stakeholder reference</li><li>• Upload Modern Slavery Statement to FLG intranet &amp; external website</li></ul>	FY25



## Criteria 6:

# Consultation

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The Modern Slavery Working Group continued to represent FLG in relation to FLG's modern slavery response. Consisting of representatives from Procurement, People & Culture, and Legal with overarching endorsement from the FLG Executive Committee and Board, the Modern Slavery Working Group meet to table initiatives and discuss progress in our response to the Act.

FLG Reporting Entities continued to engage more closely with independent contractors particularly those who choose to engage/employ staff, to ensure that their business practices are in line with our expectations regarding managing the risks of modern slavery.



## Criteria 7:

# Future Initiatives

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**FLG is committed to strengthening its modern slavery response. FLG will progress the following initiatives in the 2025 financial year reporting period:**

- **Deliver Modern Slavery Training:** Implement comprehensive modern slavery training for employees to enhance awareness, understanding, and the ability to identify potential risks within their roles.
- **Update the Modern Slavery Framework:** Update the framework as necessary to reflect evolving regulations, industry best practices, and organisational commitments.
- **Ensure Alignment of Company Policies with Modern Slavery Objectives:** Continue the review of company policies, including the Recruitment Policy, ensuring explicit reference to modern slavery objectives and make necessary adjustments to uphold ethical recruitment and employment practices.
- **Develop Risk Assessment Criteria for Tier 2 Suppliers:** Create a clear and actionable assessment methodology to identify modern slavery risks within FLG's tier 2 supply base and incorporate this assessment into supplier selection and monitoring processes.
- **Enhance Internal Communication and Training:** Increase awareness of modern slavery risks across the organization through improved internal communication channels and provide tailored training for all employees to recognize and address potential modern slavery issues in their roles.
- **Strengthen Collaboration with Vendors:** Maintain ongoing dialogue with vendors to understand their strategies for managing modern slavery risks.
- **Create a Supplier Code of Conduct:** Consider the development of a Supplier Code of Conduct outlining clear expectations regarding modern slavery compliance, ethical practices, and labour standards.
- **Explore Industry Collaboration Opportunities:** Engage with the health and fitness industry, other modern slavery reporting companies, and Non-Governmental Organizations (NGOs) to share knowledge and develop collaborative initiatives to address modern slavery risks.

**This statement was approved by the Board of Fitness & Lifestyle Group Bidco Pty Ltd in December 2024 and is signed by Greg Oliver, Chief Executive Officer and Managing Director.**

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**Greg Oliver**  
**Chief Executive Officer &**  
**Managing Director**

*All enquiries or feedback in relation to this statement should be directed to FLG's Legal Team via email: [legalcounsel@fitlg.com](mailto:legalcounsel@fitlg.com)*





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