

PLANET FITNESS
CODE OF ETHICS

At Planet Fitness, our mission is to help our members enhance their lives by providing them with an affordable, high-value, non-intimidating, judgement-free fitness environment. We have developed this Code of Ethics to ensure we operate with the highest standards of professional and ethical conduct as we continue to become THE global fitness leader. As we pursue our mission, we are committed to following a path guided by our Core Values described below and PF Purpose, our Corporate Social Responsibility platform:

Passion We perform our roles with purpose and a positive attitude that will inspire others.

Excellence We set ambitious goals and work hard to surpass those expectations. We are committed to quality in everything that we do.

Respect We treat each other fairly and with dignity. We value the diversity of our workforce and our members by fostering a positive, energizing and inclusive environment.

Transparency We are honest and open with all stakeholders, including our employees, franchisees and members. We are proactive in clearly communicating who we are, how we are doing and what we are going to do.

Integrity We are honest with each other and inspire trust by saying what we mean, doing what we say and taking responsibility for our actions. We will not tolerate unethical behavior.

We also expect to have fun along the way! Life's too short not to have a great time and we are always striving to create a fun environment for members, franchisees, employees and other business partners. We need to incorporate these Core Values in everything that we do. We expect employees to live these Values every day, and the Company will do so as well. Likewise, everyone, regardless of position, is expected to understand our ethical and legal obligations and to follow those obligations. Our actions speak louder than our words – and those actions are critical if we are to maintain the trust and respect of our members and other stakeholders as we build a company of which we can be proud.

If you have questions about the Code of Ethics or about any specific situations, we encourage you to talk with your manager, a member of the Legal or Human Resources team, or any Company leader. You can also report concerns or seek guidance by using the PF Integrity Line.

This is your planet. Make sure it's one that we can be proud that we've built together. Thanks for being part of the journey.

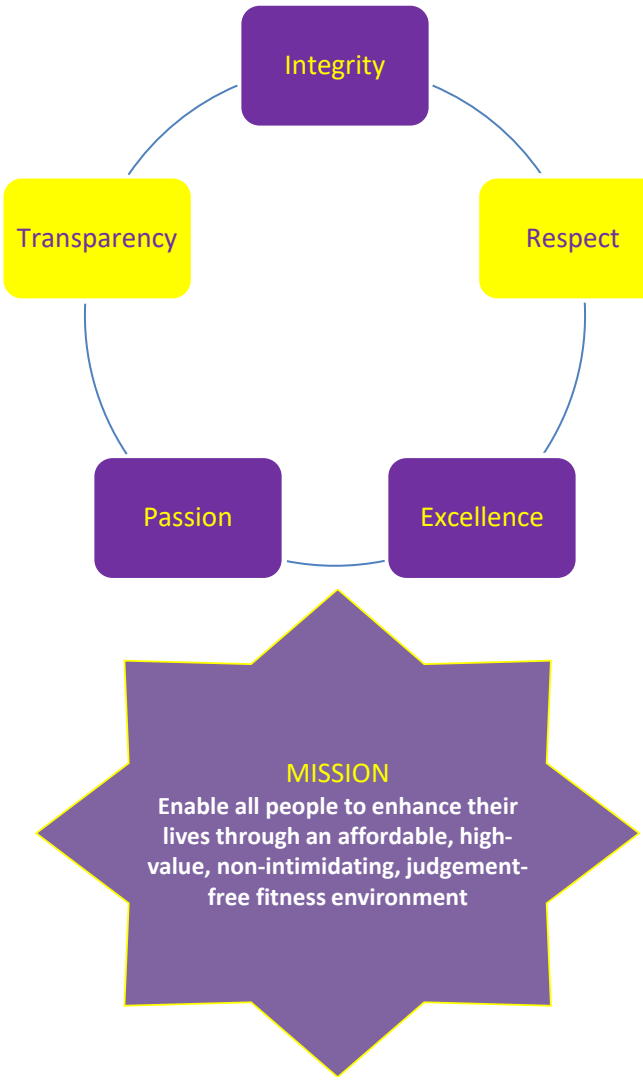
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OUR MISSION AND VALUES

We believe the honest and ethical conduct of our employees is essential if we are to build a successful company. There is a direct relationship between the conduct of the Company and its employees and our ability to reach our goal - to provide our members and employees with safe and energetic environments where everyone can feel accepted and respected.

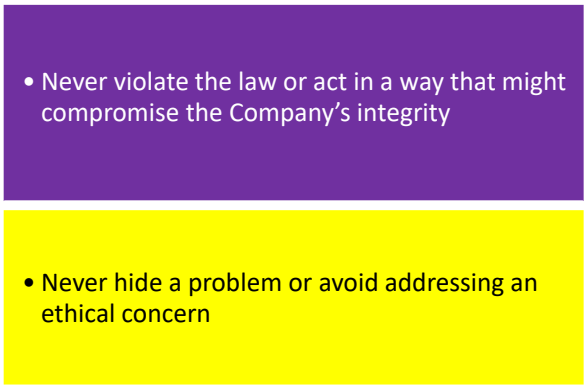


SCOPE AND RESPONSIBILITIES

This Code of Ethics (the "Code") describes the standards of conduct that we expect our employees to follow in all of their work activities. We require that you comply with these standards for many reasons – to follow the law; to protect our good reputation; but, most of all, because Planet Fitness has always been guided by a values system that emphasizes integrity and trust at all levels of the organization.

There are two general and equally important principles which should guide your actions when confronted with ethical issues: (1) whether by your action or inaction, never violate the law or behave in a way that will call into question the Company's integrity; and (2) don't hide or avoid addressing an ethical problem or concern.

Guiding Principles



This Code outlines specific laws which employees must follow and also describes general principles to be used in making ethical decisions. It cannot and is not intended to address every specific situation.

This Code covers the entire Planet Fitness organization - to all full and part-time, regular and temporary employees of the Company, and members of the Company's Board of Directors ("Directors"). Directors and employees share the same obligations under the Code and references to obligations of "employees" are also obligations of the Directors. Furthermore, we expect our franchisees, vendors, contractors, other business partners and other representatives performing work for the benefit of Planet Fitness to share our standards and to operate in a legal and ethical manner. The Company also has a specific policy, the Vendor Code of Conduct, which describes our expectations regarding vendors.

All managers are responsible for making sure that their employees have access to and are familiar with this Code. We strongly encourage that employees and their managers talk with each other about situations they may confront that have ethical implications and to find acceptable ways of handling those situations. All employees are expected to work in compliance with this Code and

promptly report suspected violations. Any employee who has questions about the Code is strongly urged to contact Planet Fitness's Human Resources Department or Legal team for assistance.

While the responsibility for compliance with the Code of Ethics is shared by all employees, compliance oversight is shared by the Legal and Human Resources Departments.

Things to Ask Yourself



COMPLIANCE WITH THE LAW

We are all responsible for complying with the spirit and letter of all laws and regulations where the Company conducts business, including all laws relating to employment, licensing, distributing, anti-corruption, antitrust, tax, equal opportunity, securities, banking, currency, environmental, and health and safety. Although you are not necessarily expected to know the precise details of each of these laws, it is important that you are able to identify when a potential issue may have arisen so that you can seek guidance from an appropriate source, including the Legal Department.

No employee has authority to violate any law or to direct another employee or any other person to violate the law on behalf of the Company. As we continue building Planet Fitness into a global organization, we will need to become increasingly aware of our obligations outside of the United States. If an employee is concerned that a foreign law may be in conflict with a U.S. law, he or she should discuss it with Planet Fitness's General Counsel before taking any action. If local legal requirements are less stringent than Company policy, employees are required to follow Company policy. The following sections provide more specific information on certain types of laws.

Antitrust Laws

"Antitrust" or "competition" laws are designed to protect consumers and encourage free and fair competition. These laws generally prohibit certain conduct regarding a company's interactions with competitors, customers or suppliers in the marketplace. This conduct includes activities such as making agreements with competitors on pricing or markets. Planet Fitness requires compliance with laws concerning fair competition. As these laws are often quite complex, an employee should contact the Legal Department with any questions about specific practices or requirements.

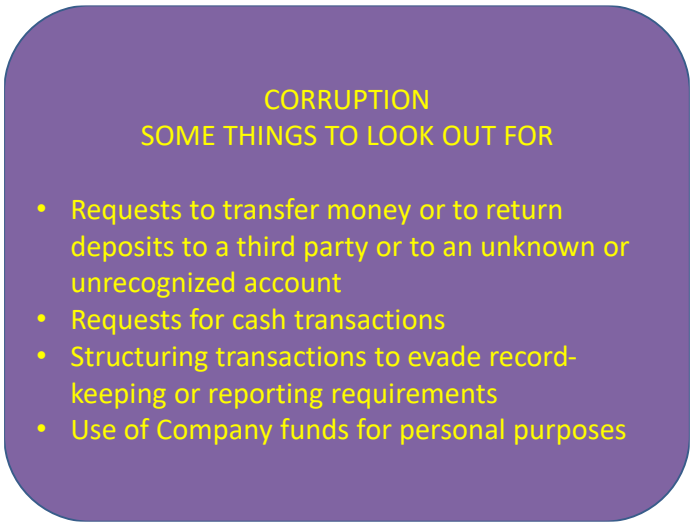


Anti-Corruption Laws/Bribery

Planet Fitness does not tolerate or permit bribery, corruption or unethical business practices of any kind. Not only is bribery against the law, but it violates one of our Core Values – that we will operate with the highest level of integrity. Bribes can include money, gifts, hospitality, expenses, reciprocal favors, political or charitable contributions, or any direct or indirect benefit or consideration. Bribes, whether made directly or indirectly through third parties or other means, are not permitted under any circumstances.

Bribery of public officials is illegal and prohibited under Company policy. It is illegal to give anything of value to government officials, political parties, party officials, executives and employees of government-owned or government-run companies, anyone acting on behalf of any of these officials or candidates for public office for the purposes of obtaining, or retaining, business for the Company. The penalties associated with non-compliance with these laws can include substantial fines for individuals and companies. Planet Fitness also prohibits offering anything of value to individuals in the private sector in order to obtain an improper business advantage. This applies to all Planet Fitness employees as well as to all persons performing work for the benefit of the Company.

Planet Fitness's Global Anti-Corruption Policy provides more details for employees, including an effective complaint process to bring concerns to the Company's attention.



Insider Trading Laws

The Company's Insider Trading Policy provides the Company's guidelines with respect to trading, and causing the trading of, the Company's securities or securities of certain other publicly-traded companies and the handling of confidential information. The Insider Trading Policy applies to all Planet Fitness officers, employees and Directors. Planet Fitness requires compliance with all applicable securities laws, including those with respect to insider trading, as set forth in the Insider Trading Policy.

COMMITMENT TO A RESPECTFUL AND RESPONSIBLE COMMUNITY

Our community must be a strong, respectful and judgement-free one which reflects standards of honesty, loyalty, trustworthiness, fairness, concern for others and accountability.

Discrimination and Harassment

Planet Fitness believes that our diversity helps drive innovation and excellence and that our employees will perform best in an environment free of discrimination and harassment. In support of this belief, Planet Fitness is an equal opportunity employer, dedicated to a policy of non-discrimination in employment. Likewise, the Company is committed to maintaining a respectful workplace and will not tolerate harassment. Consequently, Planet Fitness prohibits discrimination or harassment on the basis of race, color, age, gender, gender identity, pregnancy, religion, national origin, alienage or citizenship status, creed, ancestry, disability, sexual orientation, sex, marital status, veteran/military status, genetic information, predisposition or carrier status or any other basis prohibited by law.

Planet Fitness's Equal Employment Opportunity Policy and Non-Harassment Policy provide more details for employees, including an effective complaint process to bring concerns to the Company's attention and PF Purpose, our Corporate Responsibility Platform, provides more details on our commitment to diversity, equity and inclusion.

Planet Fitness prohibits discrimination or harassment on the basis of race, color, age, gender, gender identity, pregnancy, religion, national origin, disability, sexual orientation, marital status, veteran/military status, genetic information, alienage or citizenship status, creed, ancestry, sex, predisposition or carrier status, or any other basis prohibited by law.

Treatment of Others

We expect all employees to deal ethically with and treat everyone with respect, courtesy, dignity and fairness, whether they are other employees, franchisees, employees of franchisees, members, business partners, or competitors. It is our policy to emphasize the excellence of our own services, products or concepts. No one should take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or by other unfair practices.

Health and Safety

Let's be careful out there! Planet Fitness is committed to providing safe and healthy work environments for our employees and our customers. Employees are required to follow all safety and health laws, regulations and Company policies and to report immediately any accidents, injuries and unsafe practices or conditions.

Furthermore, the Company expects employees to report to work able to perform their duties, and free from the influence of illegal drugs or controlled substances, or the abuse of prescribed or over-the-counter drugs or alcohol. The Company also expects employees attending any post-work social event at which alcohol is served to drink responsibly and to comply with all applicable laws, including but not limited to underage drinking and driving under the influence.

Confidential Information

Employees may not discuss or otherwise share confidential information ("Confidential Information") with anyone outside the Company. Confidential Information may include (but is not limited to) financial information, systems, business plans, processes, procedures, franchisee and supplier lists, marketing plans, intellectual property, trade secrets, information concerning internal investigations, human resources data or any other similar information which Planet Fitness considers and treats as confidential. Confidential Information may also include comparable information that Planet Fitness has received, or may receive, from any franchisees, members, suppliers, consultants or other current or potential business partners. Confidential Information does not include an employee's own wage or compensation information, or information about the terms and conditions of employment at Planet Fitness.

Employees should assume that all Company information is confidential until they know it has been properly disclosed publicly. Employees should share Confidential Information within the Company on a "need to know" basis only and may not use Confidential Information for personal gain.

In some situations, it may be appropriate to disclose Confidential Information to certain business partners. However, prior to any such disclosure, employees should discuss the issue with their managers and the Legal Department to make sure that appropriate confidentiality and non-disclosure agreements are in place.

Planet Fitness is also committed to respecting the privacy of our franchisees, members, suppliers and employees and shall take appropriate safeguards to prevent the unauthorized use or disclosure of such information.

Also, please review your obligations under the Company's Record Classification, Retention, and Destruction policy.

This section in no way prohibits protected activity under Section 7 of the National Labor Relations Act ("NLRA").

CONFIDENTIALITY
SOME THINGS TO LOOK OUT FOR

- Receiving confidential information from an employee about his or her prior company
- Leaving private information out in the open
- Discussing private information in public, with family or friends, or in open areas on Company or Franchisee property
- Sharing confidential organization charts or other Company data with outside parties
- Posting confidential information on social networking websites
- Confidential Information may include (but is not limited to) financial information, systems, business plans, processes, procedures, franchisee and supplier lists, marketing plans, intellectual property, trade secrets, information concerning internal investigations, human resources data or any other similar information which Planet Fitness considers and treats as confidential. Confidential Information may also include comparable information that Planet Fitness has received, or may receive, from any franchisees, members, suppliers, consultants or other current or potential business partners.

All employees, officers and Directors should protect the Company's assets, including Confidential Information, and ensure their use is efficient and for legitimate business purposes only. Theft, carelessness and waste have a direct impact on the Company's profitability and reputation. Unless otherwise prohibited by an employee's supervisor, reasonable incidental use of a Company telephone, computer or other equipment is permitted.

Company Property and Facilities

Company property, facilities or physical resources may not be used for solicitation or distribution activities which are not related to an employee's services to the Company. Employees may not solicit any other employee during working time, nor may employees distribute literature in work areas at any time. Under no circumstances may an employee disturb the work of others to solicit or distribute literature to them during their working time. Persons not employed by the Company may not solicit Company employees for any purposes on Company premises. This paragraph is in no way meant to limit employees' rights under the NLRA.

Any employee found to be engaging in, or attempting, theft of any property of the Company, including documents, equipment, intellectual property, personal property of other employees, cash or any other items of value will be subject to summary dismissal and criminal prosecution to the fullest extent of the law. All employees have a responsibility to report any theft or attempted theft to the Company's management.

Trademarks, Service Marks and Copyrights

Trademarks and service marks—words, slogans, symbols, logos or other devices used to identify a particular source of goods or services—are important business tools and valuable assets which require care in their use and treatment. No employee may negotiate or enter into any agreement regarding the Company's trademarks, service marks or logos without first consulting the Legal Department. The Company also respects the trademark rights of others and any proposed name of a new product, financial instrument or service intended to be sold or rendered to customers must be submitted to the Legal Department for clearance prior to its adoption and use. Similarly, using the trademark or service mark of another company, even one with whom our Company has a business relationship, always requires clearance or approval by our Legal Department to ensure that the use of such other company's mark is proper.

Employees must avoid the unauthorized use of copyrighted materials of others and should confer with the Legal Department if they have any questions regarding the permissibility of photocopying, excerpting, electronically copying or otherwise using copyrighted materials. In addition, simply because material is available for copying, such as matter downloaded from the Internet, does not mean that it is automatically permissible to copy or recirculate (by, for example, email or posting to an intranet facility). All copies of work that is authorized to be made available for ultimate distribution to the public, including all

machine-readable works such as computer software, must bear the prescribed form of copyright notice. This section in no way prohibits protected activity under Section 7 of the NLRA.

The Company is legally entitled to all rights in ideas, inventions and works of authorship relating to its business that are made by employees during the scope of their employment with the Company or using the resources of the Company ("Employee Developments"). As a condition of employment, employees are required to promptly disclose all Employee Developments to their supervisor, and to execute the necessary documentation to evidence the Company's ownership, or to obtain legal protection for them.

Corporate Opportunities

Employees, officers and Directors are prohibited from (a) taking opportunities for themselves personally (or for the benefit of friends, family members or others) that are discovered through the use of Company property, information or position, (b) using Company property, information or position for personal gain (including gain of friends, family members or others), and (c) competing with the Company. Each employee, officer and Director owes a duty to the Company to advance the Company's legitimate interests when the opportunity to do so arises.

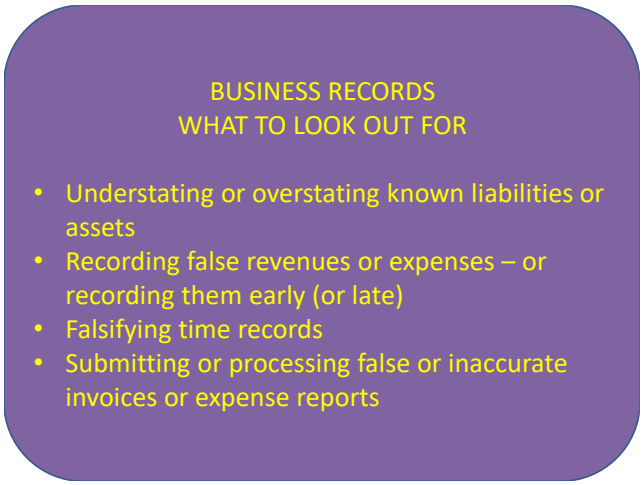
ACCEPTABLE USE OF ELECTRONIC COMMUNICATIONS SYSTEMS

Employees must exercise good judgment when using the Company's systems and data. While we make no attempt to address every possible situation that may arise and require an employee's judgment, all employees must read, understand, and acknowledge the Acceptable Use Policy and any policies referenced therein.

ACCURACY OF BUSINESS RECORDS, DOCUMENTS AND REPORTING

Planet Fitness is required to establish and maintain appropriate accounting procedures and accurate books and records that reflect all corporate assets, liabilities and transactions and to ensure that the Company's funds are used properly. Compliance with generally accepted accounting principles and established internal controls is required. All business records, including expense reports, time records, financial statements, reports to auditors and operations reports must be prepared accurately and honestly.

All employees are expected to follow these procedures. If an employee becomes aware of an improper transaction or accounting practice, or a suspect payment given or received, that employee should report the matter immediately to his or her manager or in accordance with the reporting procedures described below.



MARKETING AND PROMOTIONAL ACTIVITIES

Planet Fitness is committed to the truthful and accurate communication of information about our membership and franchise opportunities. Our marketing, promotions and advertising will be honest and factual.

CONFLICTS OF INTEREST

Conflicts of interest can happen when an employee uses his or her position for personal gain or when an employee's personal interest conflicts with the Company's interest. A conflict of interest is any situation that might limit your ability to make sound, objective decisions for the Company and can exist whether or not your judgment is actually affected. Interests of your immediate family are considered the same as your own interests. Employees must avoid any action or relationship which may be viewed as a potential conflict of interest between them and the Company. Whenever a potential conflict of interest appears to exist, you must report the details to your manager for evaluation. Directors are encouraged to bring significant matters to the attention of the General Counsel for further evaluation. The following sections describe situations where conflicts of interest may arise. For the avoidance of doubt, this section in no way prohibits protected activity under Section 7 of the NLRA.

Gifts and Entertainment

All business gifts, hospitality, business entertainment and travel expenses must comply with this Code of Ethics, the Global Anti-Corruption Policy and the Vendor Code of Conduct. Employees should not accept or give any gifts or favors which others may reasonably interpret as possibly influencing an employee's judgment. Planet Fitness recognizes that the giving and accepting of gifts, entertainment and hospitality can be part of building normal business relationships. However, some gifts and hospitality can lead to the suggestion that an improper influence has been exerted either on or by Planet Fitness

and in some instances, the giving and/or receiving of gifts and entertainment can be interpreted as a bribe.

All gifts must be reported to the Company by completing an Employee Gift Receipt Disclosure form. Gifts or favors of more than a token nature (generally with a value of $50 or more) should not be accepted from or given to anyone having or seeking a business relationship with the Company unless there has been specific approval from the General Counsel. Anyone who is offered a gift of more than a token nature that is likely intended to influence your business judgment or behavior must report it to the General Counsel.

Normal business entertainment, such as lunch, dinner, theater, a sporting event, and similar activities, may be appropriate if it is of a reasonable nature and in the course of a meeting which includes bona fide business discussions or fosters better business relations. All such types of entertainment must be reported (in advance, if practical) by the employee to his or her manager by completing an Employee Gift Receipt Disclosure Form, which must be approved by the General Counsel. Managers with concerns or questions about these situations should contact the General Counsel for guidance.

Provision of business gifts, hospitality and business entertainment to foreign public officials is prohibited.

GIFTS AND ENTERTAINMENT
WHAT SHOULD I LOOK OUT FOR?

- Receiving gifts of greater than nominal value from franchisees or other business partners, particularly if you are in a position to influence decisions that might affect the gift giver
- Receiving personal discounts or other benefits from business partners that are not generally available
- Directing Planet Fitness business to a family member or friend without full disclosure of that relationship
- Accepting an invitation from a business partner to an all-expense paid trip or event that offers little benefit to the Company

Outside Employment

An employee should never work for or receive any compensation from a supplier, franchisee or competitor without prior approval from the General Counsel. Outside employment should not interfere with an employee's duties or responsibilities to the Company or use Company employees or assets.

Employees are prohibited from taking for themselves business opportunities that arise through the use of corporate property, information or position.

Personal and Business Relationships

While the Company does not want to interfere with the private lives of its employees, it has a responsibility to prevent situations which have the potential of leading to favoritism, conflicts of interest, discrimination or claims of harassment. Consequently, employees must not supervise or have any influence on the hiring, job evaluation or salary of a relative, domestic partner or anyone with whom the employee has a close personal relationship. Any such relationships must comply with the Company's Policy regarding Personal Relationships Among Employees.

Employees should not conduct business on behalf of the Company with a member of the employee's family or a business organization with which a member of the employee's family has an ownership, management or other significant role, without prior authorization by the General Counsel.

Personal Investments

Employees must not have a financial interest in any business that is a competitor or that does or seeks to do business with the Company unless the General Counsel has given prior approval. Ownership of publicly traded securities is not considered to be in conflict with this policy, so long as the total value of the investment is less than five percent (5%) of the outstanding stock of the corporation and the amount of the investment is not otherwise so significant that it would affect your business judgment on behalf of the Company.

COMMUNITY ENGAGEMENT

Planet Fitness encourages you to be active in your communities, to speak out about issues which are important to you and to exercise your civic rights and responsibilities, including engagement in the political process.

Political Contributions

Planet Fitness does not make contributions, directly or indirectly, to any political party or candidate, in any country, even if such contributions are legal in that country.

We neither encourage nor discourage our employees from contributing personal financial support or personal service to any domestic or foreign political nominee, candidate, party or cause. However, employees may not use Company funds or assets as political donations or support under any circumstances nor shall they pressure others to make political contributions.

Stand on Issues

Employees are free to express their opinions on any issue. However, all requests to speak on behalf of the Company should be referred to the Company's designated communications

officer and a member of the Executive Management Team. When an employee disagrees with the Company's position on an issue, he or she is free to decline to comment or should make it clear that he or she speaks as a private citizen and not as a Planet Fitness employee. This is particularly important if the position the employee holds with Planet Fitness is such that he or she might be assumed to be a Company spokesperson.

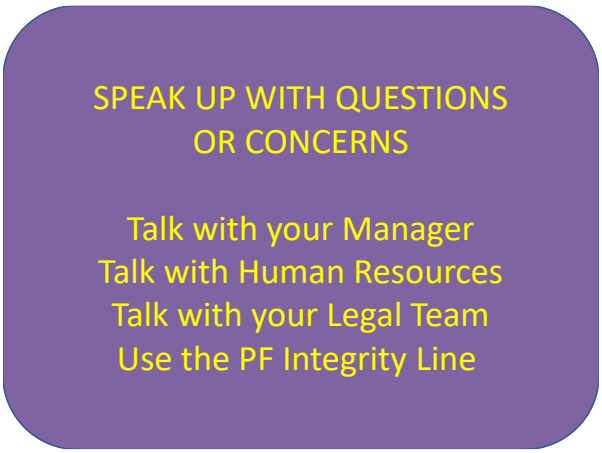


SPEAK UP! REPORTING YOUR CONCERNS

Planet Fitness is committed to promoting compliance with the laws, rules and regulations that govern our business and financial operations. All employees are expected to promptly report suspected violations of this Code of Ethics or of the law regardless of the identity or position of the individual(s) involved, whether employee, franchisee, vendor, contractor or anyone having a business relationship with Planet Fitness. Failure to report Code violations may result in disciplinary action against those who fail to report.

Reporting

Having a direct conversation with your manager or a manager in the Human Resources department about an issue will often be the most efficient way to address your concern. If you are not comfortable using these resources, if you are not satisfied with the response you receive, or if the concern relates to a particularly serious or sensitive issue, including accounting-related matters or allegations of fraudulent behavior, you are encouraged to use other resources available for reporting including the Legal Department and the PF Integrity Line. Issues can be reported to the PF Integrity Line – 24 hours a day – by either calling toll-free (888) 829-8316 or on the web at planetfitness.speakfullynow.com. Information provided to the PF Integrity Line will be taken by HR Acuity, an outside organization, which will then forward a report to Planet Fitness for investigation. While it can often be helpful in an investigation to be able to follow up with the individual making the initial report, reports can be made on an anonymous basis. Please be prepared to provide as many details regarding the situation as possible to assist with our investigation of the matter.



Investigations

The Human Resources and Legal teams will oversee all reports made through the PF Integrity Line and other significant issues reported through management. The nature of the report will determine who will be involved in the investigation of a potential violation. Management reviews the facts gathered and ensures proper resolution of each report. Specific information regarding investigations is private, but the reporter may ask about the status of an investigation, such as whether it is active or closed.

Reports made using the Company's PF Integrity Line can be made on an anonymous basis. For reports made in other ways, the identity of the reporter and participants in the investigation is kept confidential to the extent possible. All employees involved in investigations are obligated to act in accordance with this Code and the best interests of the Company.

Protection Against Retaliation

Employees can sometimes be concerned that they will be treated differently if they "blow the whistle" on a suspected violation of a Planet Fitness policy, including the Code of Ethics. However, we encourage employees who suspect that a violation may have taken place to come forward with information to help the Company investigate the situation. Retaliation in any form against anyone who reports, in good faith, a violation of the Code of Ethics, even if the report is mistaken, is prohibited. Likewise, retaliation against anyone who assists in the investigation of a reported violation is prohibited. Concerns regarding retaliation should be reported immediately to the General Counsel, the Associate General Counsel, Employment and Litigation or to Human Resources. Employees who believe they have been subjected to any conduct that violates this policy should notify the Company immediately using any of the reporting mechanisms outlined in this Code. Anyone who retaliates against someone who has reported a violation or otherwise assists in an

investigation will be subject to disciplinary action, up to and including termination of employment.



WAIVERS AND AMENDMENTS

Any waiver of the provisions of this Code for a company executive, other officer or a member of the Board of Directors may be made only by the Company's Board of Directors. Any waiver of the provisions of this Code for other employees may only be granted by the General Counsel.

VIOLATIONS

Code violations can result in disciplinary action up to and including employment termination.