



Modern Slavery Statement 2023

Published May 2024

Ooni Limited's fourth Modern Slavery Statement has been written in compliance with reporting requirements mandated by the California Transparency in Supply Chains Act 2010, UK Modern Slavery Act 2015 and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023.

The Statement outlines the human rights and modern slavery prevention activities, challenges and progress Ooni Limited and its subsidiaries have made during the last financial year, spanning from 1 January 2023 to 31 December 2023.

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Introduction

Ooni is committed to playing our part in creating the conditions for all life on the planet to thrive. We became a B Corp certified company in January 2023 and now aim to become a regenerative business. Our new strategy sets goals and shorter term targets to reduce the harm caused by our operations and, over time, contribute to both reversing it and ultimately having a regenerative impact. We plan to finalise our regenerative commitments in 2024.

As part of our regenerative business strategy, we are committed to upholding the human rights of every individual involved in our business operations. Our human rights policy and programmes are being designed around the United Nations Guiding Principles on Business and Human Rights - to ensure that we respect and remedy any violations of human rights that may occur within our value chain.

At Ooni, we have a zero tolerance stance against modern slavery in any of its forms, including forced and child labour and human trafficking, and are working on implementing due diligence mechanisms to identify and prevent all forms of egregious human rights abuses.

The Executive team at Ooni would like to express their gratitude to all our colleagues, suppliers, and external partners for their consistent efforts in creating a more respectful, safe, and inclusive work environment for all those involved in helping make Ooni a success, including people throughout our supply chain.

By working together, we can bring about a brighter, regenerative future for everyone.

Signed



Darina Garland,
Co-CEO & Co-Founder



Kristian Tapaninaho,
Co-CEO & Founder



Structure, business activities and supply chains

Our business



Our workforce



All graphic information is accurate as of the end of Ooni's financial year, 31 December 2023



Subsidiaries, business operations and suppliers



Subsidiaries

USA	Ooni Inc
Germany	Ooni GmbH
China	Ooni International Shanghai Trading Co Limited
Canada	Ooni Canada Inc
Australia	Ooni Pty Limited
New Zealand	Ooni NZ Limited
France	Ooni SAS
Italy	Ooni S.R.L.
Finland	Ooni Finland Oy
Sweden	Ooni AB
Norway	Ooni Norway AS

Operations

UK	2 offices (243 employees), 6 distribution centres
Germany	Bonn office (14 employees)
USA	Austin office (70 employees), 7 distribution centres
Canada	1 distribution centre (3 employees)
Netherlands	1 distribution centre
Philippines	Outsourced customer service (11 workers)
Thailand	Customer service (1 worker)
China	Shanghai office (4 employees)
Australia	Melbourne office (4 employees), 1 distribution centre
New Zealand	1 employee, 1 distribution centre
Sweden	2 employees
Spain	2 employees
Italy	5 employees
Finland	1 employee
France	3 employees

Direct suppliers

<i>(providers of finished products for retail)</i>	
China	Majority of ovens and accessories, merchandise patches, apron, gloves, notebook
UK	Dough trays, firestarters, wood logs, wood pellets, groceries products
Italy	Groceries products
Hungary	Groceries products
Lithuania	Wood logs
USA	Wood logs, wood pellets, groceries products
Greece	Groceries product
Spain	Groceries product
Czech Republic	Cookbook
Bangladesh	Sweatshirts and t-shirts (printed in UK)
India	Tote bags

All graphic information is accurate as of the end of Ooni's financial year, 31 December 2023

About Ooni

Ooni is a leading designer and retailer of pizza ovens. We also offer pizza-making accessories, oven fuels, books, clothing merchandise, and groceries - including dough balls and pizza ingredients.

Ooni Limited is a privately owned limited company that was established in 2012 and is registered in England and Wales under the registration number 08316049. Its voting shareholders are Magic Foundry Limited (wholly owned and controlled by Kristian Tapaninaho and Darina Garland), Simon Fry and Kevin Quinn. Ooni's business strategy, finances, and management are overseen by our Board of Directors and Executive team, including our two co-CEOs. Our operations are delivered by 12 main departments. Ooni Limited wholly owns 11 subsidiaries, which are located worldwide, including Canada.

The purpose of the subsidiaries is to market and sell Ooni products in their respective regions.

Ooni's supply chain

Our team in Scotland designs our products, which are then produced by third-party contract manufacturers. Most of our ovens and pizza-making accessories are made in China, but we also use manufacturers in the UK. Our groceries and oven fuels come from Europe and the US, while our clothing and merchandise is manufactured in South Asia and China. Once produced, Ooni's products are shipped to distribution centres around the world. None of our raw materials or products are produced in Canada. We sell into 102 countries across the globe through our 10 e-commerce websites in Europe, the US, Canada, and Oceania, as well as

Amazon's marketplaces and a network of retail and distribution partners, some of which are located in Canada.

In this statement, we classify our suppliers into two categories: direct and indirect suppliers. Direct suppliers are those who manufacture and supply the products that we sell or offer to our customers. Indirect suppliers provide us with various goods and services that support our overall business operations. In 2023, direct suppliers made up 38% of our supplier spend whilst indirect suppliers made up 62%. Our direct suppliers include sourcing agents and manufacturing sites involved in assembling or producing our hard goods, groceries, fuels and merchandise.

Ooni supplier categories

Category	Sub-category	Detail
DIRECT	Hard goods	Includes ovens and pizza-making accessories, such as peels and dough trays. Procured via 5 sourcing agents and 9 direct suppliers and manufactured or assembled in at least 25 sites.
	Groceries	Non Ooni Brand UK groceries range - procured via our UK-based distributor and their suppliers in EU countries and the UK. Non Ooni Brand US groceries range - procured via our 2 US-based distributors and 7 direct suppliers. Ooni Brand groceries range procured via 12 suppliers based in Italy, the UK and the USA.
	Fuels	6 suppliers
	Merchandise	7 suppliers
INDIRECT	N/A	Indirect suppliers provide goods and services including, but not limited to: shipping, transport, warehousing, couriers, waste management, professional services and office cleaning.

To carry out effective human rights due diligence, we need to both gain visibility of and keep track of our supply chain down to the raw material level. In 2023, we started a project to develop systems and processes to better gather, store and report on core

information about our third-parties (including customers and suppliers) relating to their financial, social and environmental activities. This was driven in part by the increase in due diligence legislation around corporate

behaviour, but also by the development of our regenerative business strategy. While the project is ongoing, we have set ourselves the target of mapping 100% of Tier 1 suppliers and Tier 2 finished goods suppliers over the next 2 years.

Policies

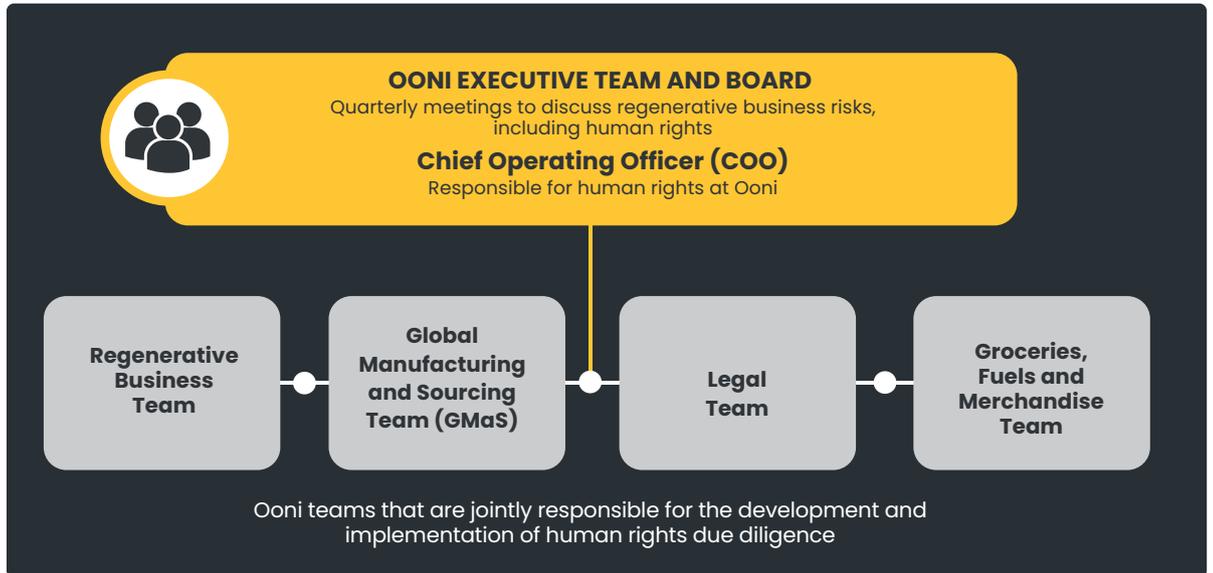
Dedicated teams

We were delighted to welcome our new Head of Regenerative Business at the start of 2023. Together with three other Regenerative Business employees, the team has been instrumental in shaping our Regenerative Business vision, which includes a pillar related to creating supply chains that are ecologically restorative, and socially just and inclusive. As part of this development phase, we have implemented monthly updates to the Executive team and quarterly reports to the

Board on our progress towards achieving our Regenerative Business goals, thus meeting our 2023 commitment to formalise this process. In 2023, we completed the establishment of our Global Manufacturing and Sourcing (GMaS) team, consisting of 11 members with responsibilities spanning across Sourcing, Compliance, Manufacturing, and Quality. The Sourcing team, consisting of four members (2 based in the UK and 2 in China), ensures that we have a

reliable hard goods supplier base that can provide us with high-quality goods at the right time and price while also working towards aligning fully with our regenerative business goals. Our additional direct suppliers are separately managed by our Groceries, Fuels and Merchandise (GFM) team, who develop and deliver pizza oven adjacent products.

Governance



Business policies

We pride ourselves on the care we take to create an environment where our teams can thrive and realise their full potential. We do this by making our five core values, one of which is kindness, central to every decision we make.

We have the following policies and procedures in place to protect our employees throughout their time at Ooni:

- *People Handbook*
- *Whistleblowing policy*
- *Grievance procedure*
- *Discrimination and Harassment Policy ("Valuing Diversity")*
- *Disciplinary procedure*
- *Anti-bribery and Corruption Policy*
- *Health and Safety Policy*
- *Human Rights Policy (newly developed - to be rolled out)*

We achieved our 2023 commitment to develop a Human Rights Policy and will be sharing this Policy with all relevant internal and external stakeholders during 2024. All new employees are required to read and sign these policies. They are also available for review on our internal HR portal.

Grievances and whistleblowing

We have a Grievance Procedure in place for our employees to report any personal concerns that they are unable to resolve with their manager.

Additionally, we have a Whistleblowing Policy for all employees, including Senior Managers and Executives; those who work for Ooni in any other capacity, including agency workers, consultants, volunteers, interns, subcontractors and contractors; and anyone who provides services personally to Ooni. We encourage everyone to use the communication channel highlighted in this policy to raise human rights concerns. We strive to investigate all reports fairly and, where possible, confidentially. Whenever required, we provide remediation in the best interests of those affected. We will ensure whistleblowers do not receive any reprisals, threats or other detrimental treatment due to raising a concern in good faith.

We will provide feedback on the progress and outcome of the case to whistleblowers. We continue to review how we can strengthen our whistleblowing procedures, including providing options for external stakeholders to report concerns.

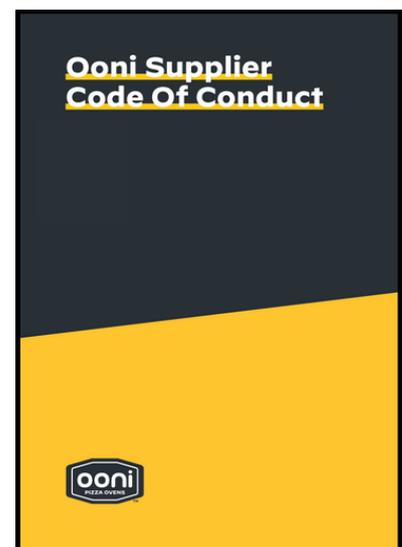
Employees

In 2023, we continued to run our Employee Net Promoter Score survey with all employees each quarter. The results were shared company-wide and continue to be used to shape company practices. We also continue to be a UK real living wage employer, accredited by the Living Wage Foundation. As part of the commitment we made in 2020, we continue to pay at least the real living wage, with a minimum salary of £25,000 or equivalent for all Ooni employees globally. In 2023, we were delighted to have

been named one of Built In's Best Midsize Companies to work for in Austin - where our US office is based.

Supply chain policies

Our Supplier Code of Conduct, which aligns with the Ethical Trade Initiative (ETI) base code, lays out the requirements suppliers must meet regarding management systems, fair, safe and respectful working conditions (incorporating clauses on forced and child labour, living wage, working hours and grievance mechanisms), environmental protection and responsible sourcing of raw materials (including sections on forced labour, cotton and conflict minerals). Our finished product suppliers based in China have all signed up to our Supplier Code of Conduct - compliance with the code is required as part of our Manufacturing and Supply Agreement.



1 <https://www.ethicaltrade.org/eti-base-code>

Due diligence

As part of our regenerative business strategy, we recognise that we are mutually accountable for the social impacts caused by the production and delivery of the goods and services which we depend on.

In order to keep up with increasing product demand since 2020, Ooni expanded its supply base quickly. This brought its own set of challenges regarding formalising and standardising our due diligence processes globally. With 95% of our direct spend being with suppliers manufacturing our products in China, we prioritised sustainable sourcing actions with this supply base. In 2023, we expanded our China team from 3 to 4 members - increasing our resources for supplier communication and coordination. Our key commitment for 2024 is to finalise our due diligence framework for application across our entire business and supply chain.

New suppliers and factories

We understand the importance of transparent communication and building strong relationships with suppliers to improve human rights performance. We introduced our hard goods supplier onboarding process in 2023 following a company-wide consultation. It incorporates:

- *Introductory calls with potential suppliers to clarify our expectations and processes.*
- *Requiring all new hard goods suppliers manufacturing in China to provide a SMETA 4-pillar audit.*
- *With key new suppliers, organising in-person meetings to discuss our regenerative business strategy and provide support to manage their social and environmental impacts.*

- *A contractually binding Manufacturing Agreement with our suppliers which covers a broad range of topics, including their commitment to comply with the Ooni Code of Conduct and cascade its requirements down their supply chains.*
- *Onboarding factories in person which helps us to build trust and establish a deeper understanding of our standards.*

If we suspect that a new supplier poses a particular risk, we conduct our own audits in accordance with our Code of Conduct. In early 2023, as part of the development of a new natural stone product we commissioned a third party to map the product supply chain, audit a potential Tier 4 processing facility and visit the associated mine in China. A plan was then developed to address known risks. It was subsequently decided, primarily for commercial reasons, not to launch this product.

Existing suppliers

We require all our existing suppliers operating in China to provide us with a semi-announced SMETA 4-pillar audit every year. To ensure compliance with our standards, our Supplier Quality Manager in China regularly communicates with each supplier through monthly progress calls and conducts several site visits throughout the year to offer additional assistance.

Indirect suppliers

In 2023, we addressed some key risks associated with indirect sourcing. We understand that logistics services can lead to human rights risks, such as long working hours and health and safety concerns. Our Regenerative Business team collaborated closely with our Logistics team to incorporate

social and environmental criteria into the screening process for freight forwarding suppliers. Our next step is to enhance our due diligence process with regard to our distribution centres, a sector that poses a risk due to demand pressures and the nature of the workforce, which often includes migrants and agency workers.

Our risk assessments also identified that the agents employed by our outsourced customer service provider may be at enhanced risk due to their employment nature and location. We engaged a human rights expert with experience in contract workers to conduct a thorough assessment, including worker interviews with the outsourced customer service team. Although the findings did not indicate any immediate risk, we will be working on implementing the specialist's recommendations to strengthen our relationship with the agency.

Risk assessment and management

In the past five years, the International Labour Organization (ILO) has reported a significant increase in the number of forced labourers, which has risen to 27.6 million.² Additionally, the number of child labourers has risen to reach 160 million.³ Circumstances such as the pandemic and armed conflicts have led to a surge in poverty, affecting more people than ever before, resulting in modern slavery infiltrating all industries and regions.

We use a variety of resources to identify potential human rights risks including desk-based research and mapping, worker recruitment information, third-party ethical audits, worker interviews, site visits by our internal teams, engagement with human rights specialists (such as The Reassurance Network) and SEDEX membership, and their risk assessment and compliance reporting tools.

Supply chain

We are a global business that sources a wide range of components, ingredients and products from multiple countries and industries where worker exploitation and human rights abuses are known to

exist. Our supply chain is where we have the most significant impact on human rights, so we focus our efforts on assessing and managing these risks, including those posed to migrant and contract workers in our groceries and other supply chains, who are at an increasing risk of exploitation. We have made it a priority to conduct due diligence to protect these workers in 2024.

Uyghur and other Turkic and Muslim-majority people

We are aware of reports of forced labour and trafficking of Uyghur and other Turkic and Muslim-majority people, particularly in Xinjiang Uyghur Autonomous Region (XUAR) of China. Through carrying out our own due diligence, we can confirm we do not source cotton or products from factories in XUAR. We also screen our audit reports for migrant worker risks in our Chinese supply base. In 2023, we invested in tailored software that enhances visibility of risks in our supply chain and supports collection of due diligence data on key materials. We commit to carrying out ongoing monitoring of our Chinese suppliers.

Operations

We believe the risk of modern slavery is low within our direct business operations as 98% of the people that work for Ooni are employed directly by us through permanent contracts. The remaining 2% are on fixed term contracts.

Modern Slavery Indicator List



Presence of migrant workers

Use of recruitment/labour agencies and agency workers

Child labour

Employment tied to accommodation

Abuse of vulnerability

Deception during recruitment

Violence

Restriction of movement

Retention of ID docs

Withholding of wages

Abusive working or living conditions

Excessive working hours

Our Modern Slavery Indicator List is adapted from the [ILO's Indicators of Modern Slavery](#).

² [ILO, Walk Free and IOM \(2022\)](#)

³ [ILO and United Nations Children's Fund \(2021\)](#)

Remediation

When our due diligence processes identify that human rights have been adversely affected, we commit to implement remediation actions that provide long term solutions that are in the best interests of those that have been impacted.

Depending on the severity of the issue, we work together with the affected people, related teams and management and external specialists, and in the case of supply chain impacts, with the agent or supplier, factory, and local communities and

organisations to remedy any issues found.

We have not had to remediate any instances of forced or child labour, including providing compensation for any loss of income in our business and supply chains during 2023.

Training and capacity building

Employees

All new employees receive information about our sustainable sourcing programme and an introduction to human rights and modern slavery as part of their onboarding process. We created the content for employee human rights training in 2023, but we were unable to deliver the training due to resource constraints.

However, training employees on human rights and providing guidance and tools for those visiting supplier sites to support them to identify high risk human rights impacts are key commitments for 2024.

Suppliers

In 2023, we planned to map and conduct due diligence on our suppliers to identify their training and support needs. However, we

identified that we lacked the necessary data systems to effectively map our suppliers and report on human rights due diligence. As a result, we shifted our focus and resources towards the development of a third-party data management approach and a human rights due diligence framework to address this. These improvements will enable us to effectively identify and support suppliers as needed.

Assessing the effectiveness of our approach

Although our due diligence and risk assessment procedures have not revealed any cases of forced or child labor, we recognise the increasing prevalence of modern slavery and the need to implement more robust systems to enable us to detect and address any instances that may be found.

With a more systematic approach to collecting, storing and managing third party data, we will be able to better track, manage, and report on the risk of modern

slavery. We regularly seek input from our external human rights partner to improve our programmes both strategically and locally.

We stay in frequent communication with our suppliers to assess their compliance with our standards and identify any areas where they may need additional support. In 2024, we will prioritise the upskilling of our teams to have more knowledgeable interactions with suppliers on these issues.

This work all sits within the strategic context of Ooni's regenerative business goals and targets which, once finalised, will provide metrics that allow us to measure the success of our actions to address social and environmental impacts.

2023 Progress Update

Activity	2023 Commitments	2023 Commitment Status
Supply Chain Mapping	Advance full mapping of Tier 1 suppliers across all categories	Ongoing: Whilst Tier 1 supplier mapping progressed, a need was identified for systems and processes to be streamlined companywide to enable this mapping <i>in full</i> . This commitment is ongoing for 2024
Governance	Formalise Regenerative Business programme reporting to the Ooni Executive team and Board	Completed: Human Rights is a rolling agenda point for quarterly Board meetings and Regenerative Business reports are provided to Ooni's Executive team on a monthly basis
Policies	Develop a business-wide Human Rights policy	Completed: Human Rights Policy has been developed and will be communicated internally and externally in 2024
Due Diligence and Risk Assessment	Build our due diligence framework and process to support the active implementation of the commitments that will be set out in our Human Rights Policy	In progress: Delayed due to team resource constraints
	Continue to carry out ongoing due diligence on forced labour risks	Ongoing: We invested in tailored software that enhances visibility of risks in our supply chain, we will use this as a tool as part of ongoing due diligence on our most salient human rights risks in 2024
	Carry out due diligence in priority areas of direct spend	In progress: Partial due diligence was carried out but team resource constraints meant this was not carried out in full
	Risk assess outsourced customer service operations	Completed: An external expert risk assessed the provider of outsourced customer service agents in the Philippines
Training	Develop modern slavery training to train key employees and our Senior Leadership Team	Completed: Training developed and due to be rolled out in 2024
	Expand employee onboarding content to include a specific section on modern slavery	Completed: Onboarding process updated to cover modern slavery
Effectiveness	Continue to develop supplier database functionality to store further sustainability information	Ongoing: A companywide project on developing an integrated approach to managing third party data was initiated. Work on this will continue into 2024

2024 Commitments Summary

Our regenerative business strategy will be our primary framework for managing Ooni's social and environmental impacts. This strategy will determine how we evaluate, measure and address human rights risks in our business and supply chains, drawing on the UN Guiding Principles on Business and Human Rights.

We recognise that Ooni has grown significantly and we are in the process of developing proper governance, policies and procedures to ensure sourcing practices are aligned across the company.

responding quickly to emerging risks as needed. Incomplete commitments from previous years have been prioritised in 2024 or will be addressed in later phases of our strategy.

In 2024 we continue to focus on a smaller number of core commitments to support our long-term success while

2024 commitments

	<p>Structure, business and supply chains</p> <ul style="list-style-type: none"> Progress mapping of Tier 1 suppliers and Tier 2 finished goods suppliers, to be completed in full by the end of 2025
	<p>Policies</p> <ul style="list-style-type: none"> Communicate Human Rights Policy internally and externally
	<p>Due diligence processes</p> <ul style="list-style-type: none"> Finalise human rights due diligence framework
	<p>Risk assessment and management</p> <ul style="list-style-type: none"> Continue to carry out ongoing due diligence on our most salient human rights risks
	<p>Training</p> <ul style="list-style-type: none"> Deliver human rights training to Senior Leadership and key Ooni employees Develop human rights guidance and tools for Ooni employees visiting supplier sites
	<p>Effectiveness of our approach</p> <ul style="list-style-type: none"> Continue to invest in data systems to enhance supplier data to enable us to track risks, trends and the effectiveness of our approach

In accordance with the requirements of Canada's Fighting Against Forced Labor & Child Labor in Supply Chains Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entity or entities listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

We have the authority to bind Ooni Limited.

Signed



Darina Garland
Co-CEO & Co-Founder
Member of Ooni Board of Directors
16th April 2024

Signed



Kristian Tapaninaho
Co-CEO & Founder
Member of Ooni Board of Directors
16th April 2024

This statement was approved by Ooni Limited Board of Directors on 16th April 2024