



Modern Slavery Statement 2025

*Published May 2026**

*All information in this 2025 statement is true as of 31 December 2025

1. Introduction

In 2023, Ooni set the ambitious goal to become a regenerative business by 2050. Following a strategic restructure in late 2025, our Regenerative Business function now sits within the Product team, reporting to our COO. By bringing our social and environmental oversight directly into our product and supply chain teams, we are creating a more unified approach to how we manage our global impact. This setup allows us to use the progress we've made in environmental integration as a model for our human rights work, ensuring that ethical considerations are built into our decision-making as our internal processes evolve. This sixth Modern Slavery Statement outlines the human rights, including modern slavery and child labour, prevention activities, challenges and progress made from 1 January 2025 to 31 December 2025 - in compliance with UK, California, and Canada legislation.

2. Business Structure And Supply Chains

About Ooni

Ooni is a commercial brand, designer and retailer of pizza ovens, dough mixers and the tools needed to make pizza at home. We exist to create trailblazing cooking products that feed both people and planet.

Established in 2012, Ooni Limited is a privately owned company registered in England and Wales (08316049) which operates 9 subsidiaries¹. It is owned by Magic Foundry Limited (controlled by Kristian Tapaninaho and Darina Garland), Simon Fry and Kevin Quinn. Our strategy and operations are overseen by a Board of Directors and an Executive team. In 2025, Ooni underwent an organisational restructure to focus our resources on our core commitments. During this transition, our co-CEOs/co-founders moved into founder positions on the board, and Karthik Iyer was appointed as CEO.

Because we do not own the factories that manufacture our products, we recognise that our greatest risk of modern slavery sits within our extended supply chain. This statement outlines our progress in identifying and mitigating those risks.

Our business

- 9 offices
- 11 third-party distribution centres
- 6 e-commerce websites
- 94 customer countries

Our workforce

- 201 direct employees – UK, USA, Canada, Germany, Australia, New Zealand, China, Sweden, France, Finland
- 18 workers employed through an agency - Philippines
- 3 contractors - UK, Thailand, Spain

¹ This includes a Canadian subsidiary

Ooni's supply chain

Our products are designed by our team in Scotland and manufactured by third-party manufacturing partners. Most of our products - including our pizza ovens, dough mixer and accessories - are produced in China. Our groceries and oven fuels are sourced from Europe and the US. Once manufactured, these products move through a global network of distribution centres to reach our customers via our 6 e-commerce sites, various Amazon marketplaces and a network of retail and distribution partners².

Our supplier network is divided into two categories: direct suppliers, who manufacture the products we sell, and indirect suppliers, who provide the services and goods that support our business operations. Currently, our Tier 1 direct suppliers are located across 6 countries. These include sourcing agents and the manufacturing sites responsible for assembling our hard goods, groceries, fuels and merchandise.

Ooni supplier categories

Category	Sub-category	Scope
DIRECT	Hard goods	Includes ovens, mixer and pizza-making accessories. Procured via 13 direct suppliers and 2 sourcing agents, and manufactured or assembled across 21 sites.
	Groceries	- Non Ooni Brand UK groceries range procured via our UK-based distributor and their suppliers in EU countries and the UK. - Ooni Brand groceries range procured via 6 suppliers based in Italy, the UK and USA. - Ooni Licensed products produced in partnership with 5 licensees in the UK, Canada and USA.
	Fuels	4 suppliers
	Merchandise	2 suppliers
INDIRECT	N/A	Indirect suppliers provide goods and services including, but not limited to: shipping, transport, warehousing, couriers, waste management, office cleaning and other professional services.

3. Policies

Governance

Our human rights commitments are managed through our Regenerative Business strategy. While this covers nine key areas of impact, our work on modern slavery is driven by two core pillars:

- **People** - *creating diverse workplaces where our teams can thrive and realise their full potential.*
- **Supply Chain** - *ensuring our supply chains are ecologically restorative, socially just and inclusive.*

Senior accountability for our human rights due diligence and modern slavery reporting sits with our Chief Operating Officer, Amanda Tolhurst.

² Including some based in Canada.

Business Policies

We uphold these commitments through our Employee Handbook and specific policies. A full policy review was completed in April 2025, with an additional review in October 2025 to incorporate US region-specific policies and align with our new organisational structure. Relevant human rights policies include:

- Prevention of Economic Crime (including Anti-Bribery and Corruption)
- Anti-Harassment & Bullying
- Equity, Diversity & Inclusion (EDI)
- Whistleblowing Policy
- Supplier Code of Conduct (aligned with ETI Base Code)

Grievances and Whistleblowing

Ooni is committed to providing safe, accessible channels for reporting concerns. In 2025, we enhanced our internal reporting mechanisms by introducing "Your Voice", an anonymous reporting tool managed through our HRIS. It is available for internal or external use as a confidential "last-resort" option when traditional reporting lines feel unsuitable or unsafe. We aim to respond to all reports within seven days. This system supports our Whistleblowing Policy, enabling the secure reporting of illegal or unethical behavior, harassment and health and safety risks while protecting the reporter's identity. It also ensures our compliance with the EU's Whistleblower Protection Directive 2019/1937.

Employees

Our responsibility starts with our own team. We use our quarterly Employee Net Promoter Score (ENPS) survey to monitor job satisfaction, sharing these results company-wide to ensure feedback directly informs our business practices. We continue to be a UK Living Wage employer, accredited by the Living Wage Foundation. We ensure all UK Ooni employees are paid a real living wage, with a minimum salary of £25,000.

Supply chain standards

We expect our suppliers to meet the same ethical standards we set for ourselves. Our Supplier Code of Conduct, which aligns with the Ethical Trade Initiative (ETI) base code, remains the foundation of these expectations. It mandates fair, safe and respectful working conditions - specifically addressing forced labour, child labour, living wages and grievance mechanisms - alongside environmental protection and the responsible sourcing of raw materials. Compliance with this Code is a requirement of our Manufacturing and Supply Agreements. For our finished goods suppliers in China, we maintain two requirements for onboarding and ongoing partnership:

1. *Adherence to the Ooni Supplier Code of Conduct*
2. *A valid SMETA 4-Pillar audit*

Following its development and rollout in 2024, our Supplier Manual serves as the operational blueprint for these partners, defining our requirements for compliance and sustainability. In 2025, we continued to embed this manual as the baseline for these supplier relationships.

4. Risk Assessment And Management

A range of sources are used to identify and assess human rights risks in our business and supply chains. We combine traditional desk-based research and third-party ethical audits with Sedex SAQs and risk assessment tools to maintain a broad view of our impact. This

process evolved in 2025 with the introduction of our own SAQ, designed specifically to capture the nuances of groceries suppliers and distribution centres.

Supply chain risks

As an international brand, we recognise that our sourcing of components, raw materials and ingredients intersects with regions and industries where child labour and worker exploitation are documented systemic issues. Throughout 2025, we placed a particular emphasis on assessing the risk related to migrant and temporary agency workers within our distribution and groceries networks - as the nature of work in these industries brings a higher vulnerability to exploitation.

In line with international ethical standards, we continue to monitor the risk of forced labour and human trafficking within the Xinjiang Uyghur Autonomous Region (XUAR). Through our ongoing due diligence and supplier mapping, we can confirm we do not source cotton, other materials or products from factories in XUAR.

Direct operations

The risk of modern slavery within our direct business operations continues to be assessed as low. We maintain a stable employment model where 98% of our global workforce are on permanent contracts, with the remaining 2% on fixed term arrangements.

5. Due Diligence

Our due diligence efforts reflect our commitment to addressing the human rights impacts of the goods and services we depend on. While our historical focus centered on our primary manufacturing base in China, 2025 saw us broaden our scope to include key distribution partners and groceries suppliers globally.

Data systems and supply chain transparency

Our Third Party Data (TPD) project was launched in late 2023 to develop systems and processes to better gather, store and report on core financial, social and environmental information about our third parties (this includes both customers and suppliers). To support this, we established an employee incentive-linked goal as part of the company-wide profit-sharing scheme for 2025, with a target to:

1. Identify the core data we need to collect from the suppliers we work with
2. Collect 100% of available data for 90% of key logistics suppliers and 90% of our manufacturers.

At the end of 2025 we met these targets, achieving comprehensive data collection for 90% of these third parties. Securing this data ensures a more transparent view of our supply chain, facilitating consistent and effective due diligence as our supply base evolves. Furthermore, this data is no longer a standalone project, work is underway to embed its collation into our standard supplier and customer onboarding workflows company-wide.

Human rights due diligence (HRDD) framework

In 2025, we partnered with specialist consultants to design a bespoke risk assessment model for our supply chain, to enable a strategic shift from reactive monitoring to a

proactive data-led human rights due diligence (HRDD) framework. This work established a two-stage methodology designed to segment our supply chain by risk profile, focusing on distinguishing between high and low-risk sites to allow for future resource prioritisation. While currently in its pilot phase, the model provides scoring benchmarks and audit-track protocols that are ready for integration into our sourcing and procurement workflows as our data maturity and internal capacity evolves. To ensure continuous oversight during this transition, we implemented interim guidance to maintain assessment across our primary hard-goods manufacturing partners.

Existing suppliers - direct and indirect

We continue to require annual, semi-announced SMETA 4-pillar audits for our direct production partners in China. Our dedicated China-based team maintains active oversight through frequent site inspections and direct communication. Throughout 2025, we used our Supplier Manual and Code of Conduct (CoC) to reinforce our expectations regarding labour standards. For our wider network, we successfully deployed a custom Self-Assessment Questionnaire (SAQ) to our third-party distribution centers and key groceries suppliers. We evaluated these responses for potential human rights vulnerabilities and initiated follow-up processes where areas for improvement were identified. We continue to feature social and environmental criteria in our screening process for freight forwarding suppliers.

6. Remediation

Should our due diligence processes identify adverse human rights impacts, we are committed to implementing remediation strategies that prioritise the long-term wellbeing of the affected individuals. Depending on the specific context and severity of a reported issue, we may collaborate with internal teams, supplier management and external human rights specialists to determine the most appropriate corrective actions. Our goal is to ensure that any response is proportional and provides a sustainable solution for those in our supply chain.

For the 2025 reporting period, Ooni did not identify any instances of child or forced labour within our business or supply chains. As such, no remediation actions or compensations for loss of income were required.

7. Training

Site visit checklist and training

Building on development work that started in late 2024, in 2025 we collaborated with an external human rights consultant to finalise a site visit checklist for our team to use when visiting key suppliers. This tool is designed to raise awareness of human rights risks during routine factory visits and provide a practical guide for identifying potential concerns on the ground. In 2025, we piloted it on several site visits and used the results to complement and sense-check information held in formal audits and SAQs. The integration of these first-hand observations into our internal supplier records is intended to strengthen our long-term risk visibility and ensure our teams are better equipped to identify and report indicators encountered during future site visits.

8. Assessing The Effectiveness Of Our Approach

We recognise that the global landscape for modern slavery and child labour remains a significant risk, exacerbated by increasing economic and geopolitical instability. We remain committed to enhancing our systems to better identify potential or actual incidents within our operations and supply chains.

Following our 2025 restructure, our Regenerative Business function is now aligned with our Product and Sourcing teams. This transition is designed to enable a more integrated approach to human rights due diligence by placing it closer to our core supply chain decision-making. While our due diligence has not uncovered any instances of forced or child labour to date, we view the development of our Third Party Data (TPD) project, our site-visit tools and risk-scoring methodologies as foundational steps in strengthening our long-term visibility. Additionally, we continue to monitor evolving global legislation through our Core Compliance Team to ensure our internal standards remain robust and compliant.

2025 Progress Update

Activity	2025 Commitment	Status
Business structure and supply chains	Progress supplier mapping, specifically: <ol style="list-style-type: none"> 1. Identify the core data we need to collect from the suppliers we work with 2. Collect 100% of available data for 90% of key logistics suppliers and 90% of our manufacturers 	Complete: Through our Third Party Data (TPD) project and employee incentive-linked goal as part of the 2025 company-wide profit-sharing scheme.
Policies	Communicate Human Rights Policy internally and externally	In progress: Delayed publication until policy can be updated and aligned with our HRDD framework, which is currently under development.
Risk assessment and management	Continue to carry out ongoing due diligence on our most salient human rights risks within our supply chain.	Ongoing: Developed and deployed custom SAQs for distribution centres and key grocery suppliers. Evaluated results for vulnerabilities and initiated follow-up processes where required.
Due diligence processes	Finalise our HRDD framework	In progress: Risk-assessment methodology defined, next phase is to consolidate into full HRDD framework.
Training	Deliver human rights training to key Ooni employees	Complete: Human rights awareness was integrated into the supply chain teams' pilot of the new site-visit checklist.
Training	Develop human rights guidance and tools for Ooni employees visiting supplier sites	Complete: Partnered with external consultants to finalise and pilot a site-visit checklist. The tool is now available for key teams to verify

Training	Develop human rights guidance and tools for Ooni employees visiting supplier sites	Complete: Partnered with external consultants to finalise and pilot a site-visit checklist. The tool is now available for key teams to verify audit data on the ground.
Effectiveness of our approach	Continue to invest in data systems to enhance supplier data to enable us to track risks, trends and the effectiveness of our approach	Complete: Met TPD project targets, achieving 100% data collection for 90% of global manufacturers and logistics partners. This data is now being embedded into standard onboarding workflows.

2026 Commitments

Business structure and supply chains	Embed Third Party Data (TPD) collection into standard supplier onboarding processes.
Policies	Update our Human Rights Policy to align with our evolving Human Rights Due Diligence (HRDD) framework.
Risk assessment & management	Use Third Party Data (TPD) to identify high-level supply chain hotspots and inform future risk-assessment cycles.
Due diligence processes	Maintain the Human Rights Due Diligence (HRDD) risk-assessment model as a foundational framework and integrate into sourcing processes as our data maturity and internal capacity evolves.
Training	Develop human rights training for key teams and integrate into onboarding processes.
Effectiveness of our approach	Leverage our Third Party Data systems to monitor supplier trends and evaluate the long-term effectiveness of our approach.

Signature

In accordance with the requirements of Canada's Fighting Against Forced Labour & Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I 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.

I have the authority to bind Ooni Limited.

Signed

A handwritten signature in black ink, appearing to read 'Karthik Iyer', is written over a horizontal line.

Karthik Iyer
CEO, Member of Ooni Board of Directors
7 April 2026

This statement was finalised and approved by the Ooni Limited Board of Directors in April 2026.