



Modern Slavery Statement 2022

June 2023



Ooni Limited's ("Ooni") third Modern Slavery Statement, relating to the year ending 31st December 2022, has been written in accordance with section 54 of the UK Modern Slavery Act 2015 and with section 3 of the California Transparency in Supply Chains Act 2010.

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Introduction

At Ooni, we firmly believe that our business should be a force for good. So much so that in 2022 we are delighted to announce Ooni not only became a certified B Corp, but we also set our ambition to become a regenerative business - to return more to society, the environment and the global economy than we take out. Our quadruple bottom line of People, Planet, Profit, and, of course, Pizza will help us deliver our regenerative vision.

We recognise that good working practices must extend beyond our employees to our supply chain workers. Our ongoing priority is to improve value chain transparency and due diligence so we can identify and prevent the worst forms of labour exploitation, trafficking and human rights abuses. We are mindful of the UN

Guiding Principles on Business and Human Rights. We are working towards formalising mechanisms to respect, protect and, when necessary, remedy the human rights of everyone in our value chain. We have a zero-tolerance approach to modern slavery at Ooni.

We are pleased to share the progress Ooni and our 100% owned subsidiaries have made on our modern slavery prevention programme. Our Statement summarises our programme activities and the challenges experienced during the 2022 calendar year. The section at the end of this Statement reviews last year's commitments and sets out our activities for 2023.

On behalf of the Ooni Executive team, I'd like to take this opportunity to thank

our colleagues, suppliers and external partners for their ongoing efforts to make our business and supply chains more respectful, safe, and inclusive places to work.

Signed



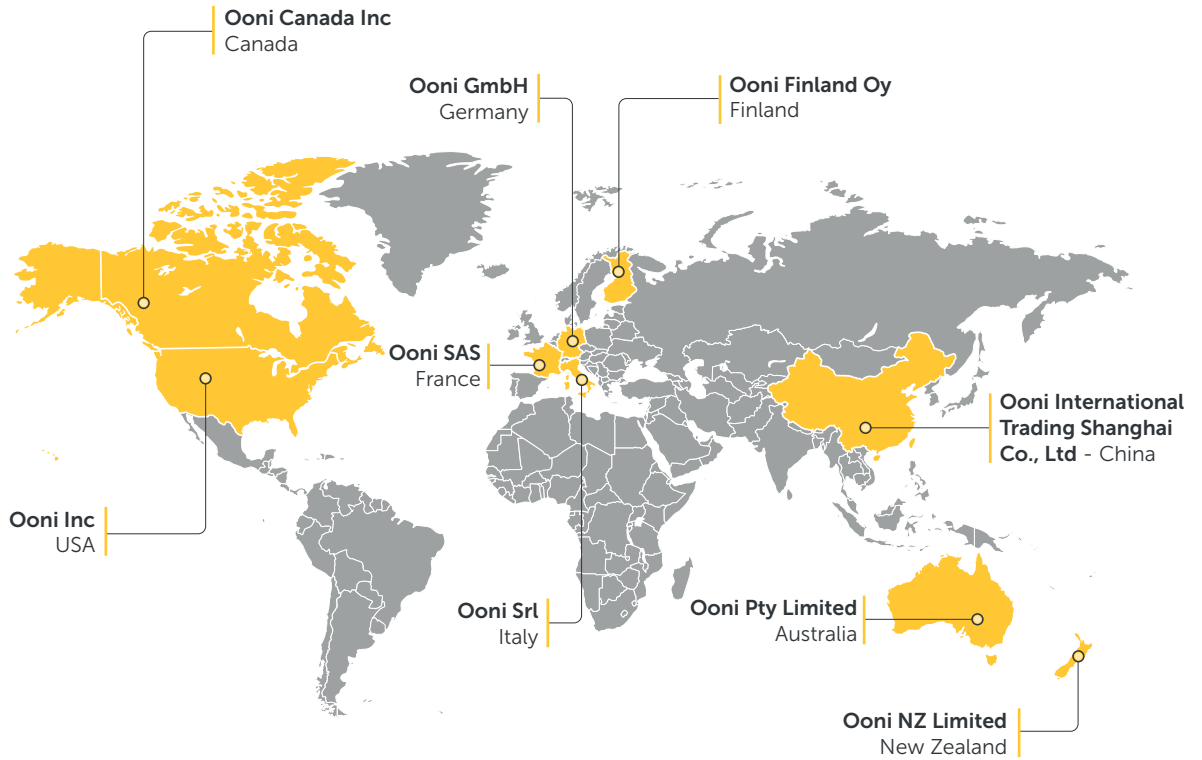
Darina Garland,
Co-CEO & co-founder



Greg Muir,
Chief Operations Officer



Our subsidiaries



Structure, business and supply chains

Our business



Our workforce



All graphic information is accurate as of the end of Ooni's financial year, 31 December 2022

Business operations and suppliers



Operations

UK	2 offices and 8 UK distribution centres
Germany	Bonn office
USA	Austin office and 9 US distribution centres
Canada	1 Canada distribution centre
Netherlands	3 distribution centres
Philippines	Outsourced customer service
Thailand	Outsourced customer service
China	China supply chain team (3 employees)
Australia	Melbourne office and 1 Australia distribution centre
New Zealand	1 employee and 1 New Zealand distribution centre
Spain	2 employees
Italy	5 employees
Finland	1 employee
France	4 employees

Direct Suppliers (providers of finished products for retail)

China	Majority of ovens and accessories
UK	Dough trays, firestarters, wood logs, UK doughballs and selected groceries
Italy	Selected groceries
Hungary	Selected groceries
Lithuania	Wood logs and charcoal
USA	Books, wood pellets, US doughballs and selected groceries
Greece	Groceries product
Slovenia	Cookbooks
Czech Republic	Cookbooks
Bangladesh	Caps
India	T-shirts

About Ooni

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

Ooni Limited, founded in 2012, is a private limited company registered in England and Wales under the registration number 08316049. Our headquarters are in Broxburn, Scotland, with offices in Edinburgh (Scotland), Austin (USA), Bonn (Germany) and Melbourne (Australia). We employ 319 people globally, including three colleagues in China. We use 23 third-party operated distribution centres located in the UK (8 distribution centres), Netherlands (3 distribution centres) and North America (9 US distribution centres, 1 Canada distribution

centre), Australia (1 distribution centre) and New Zealand (1 distribution centre).

We also have outsourced customer service operations in the Philippines, Thailand and Australia.

Ooni Limited is a privately owned company. Its voting shareholders are Magic Foundry Limited (wholly owned and controlled by Kristian Tapaninaho and Darina Garland), Simon Fry and Kevin Quinn.

Ooni's supply chain

Our hard goods are designed and engineered by our team in Scotland and manufactured via third-party contract manufacturing partners in factories predominantly located in China. They are then shipped to distribution centres around the world.

Our products are sold in over 97 countries worldwide - through our 10 e-commerce websites in Europe, the US, Canada and Oceania, through Amazon's marketplaces globally, and a network of retail and distribution partners.

For the purpose of this Statement, we categorise our suppliers as direct - those that source and manufacture the products that we sell or give to customers, and indirect suppliers - those that provide other goods and services that support our business operations.

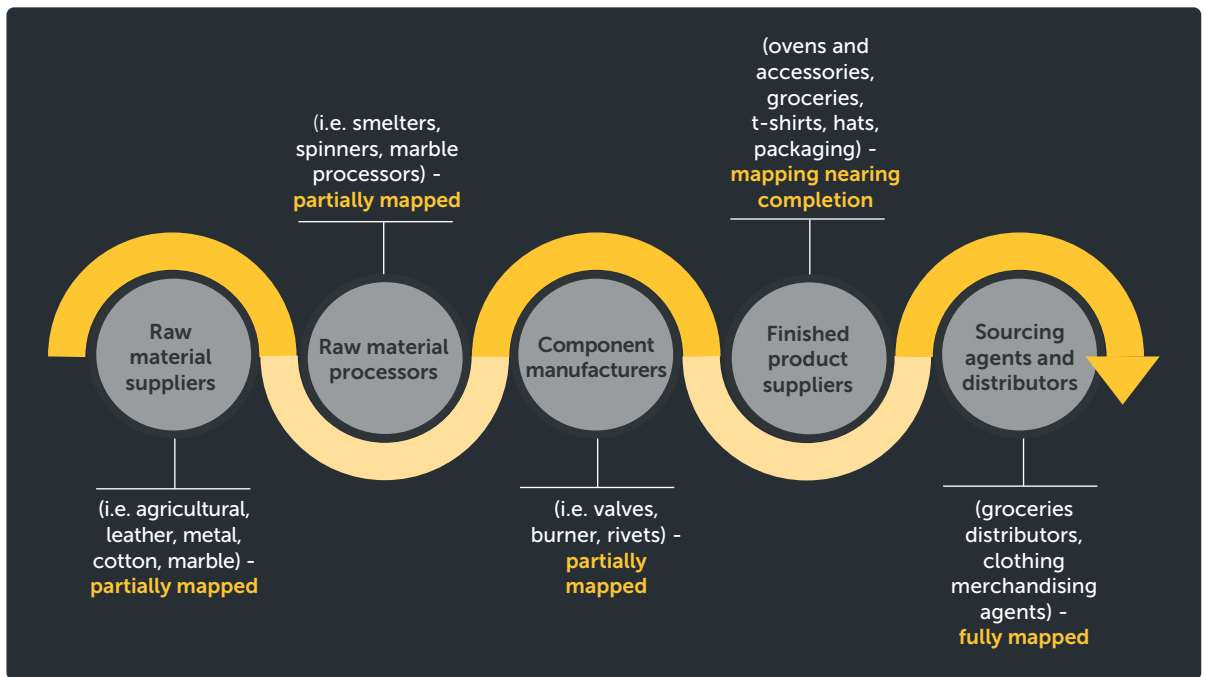
Direct procurement

Our direct suppliers include sourcing agents and sites involved in assembling or producing our hard goods, groceries, solid fuels, apparel and merchandise and packaging.

Ooni supplier categories

Supplier Category	Sub-category	Detail
DIRECT	Hard goods	Includes ovens and pizza-making accessories, such as peels and stones. Procured via 6 sourcing agents and direct suppliers and manufactured or assembled in 21 sites
	Groceries	UK grocery range procured via distributors and suppliers in the UK and EU countries (including Hungary and Italy). US grocery range procured via US suppliers and European products through our 2 US-based distributors and 10 direct suppliers.
	Packaging	Product packaging, i.e. any pack that carries Ooni branding and/or is in direct contact with the product. Mapping in progress.
	Solid fuels	4 suppliers
	Merchandise	11 suppliers (books, caps, t-shirts, aprons, gloves)
INDIRECT	N/A	Indirect suppliers provide the following services: shipping, transport, warehousing, couriers, waste management, professional services and office cleaning.

Direct Supply Chain Mapping



We recognise the importance of gaining supply chain visibility down to the raw material level to meet our moral and legislative modern slavery obligations. We have largely mapped our supply chain's sourcing agents and finished product hard goods suppliers and have partial visibility on our component manufacturers and raw materials processors and suppliers.

In our last Statement, we committed to tracing our component and grocery suppliers and to start mapping our indirect suppliers. During 2022 our supply base expanded rapidly to keep pace with our growth. In response to this, we put our resources into bringing on board new suppliers that reflected our values, deprioritising mapping our lower-tier

suppliers as a result. We will refocus on these mapping efforts in 2023, working to increase visibility across the breadth of our supply base at Tier 1, according to known geographical and sectoral risks.

Structure, business and supply chains 2023 commitment



Advance full mapping of Tier 1 suppliers across all categories

Policies

Dedicated teams

Ensuring we make progress towards our ambition of becoming a regenerative business as we continue to grow at pace requires dedicated commitment and investment. In 2022, we created a new position and successfully hired a Head of

Regenerative Business who will join Ooni in early 2023 and will lead our newly renamed and growing Regenerative Business team of three.

During the last year, we also formalised the creation of our Sourcing team, whose remit covers the sourcing of hard goods. Their focus is

developing current supplier relationships and finding new suppliers who fit our values.

This team of seven works closely with new and existing suppliers to build open and supportive long-term relationships and helps them to understand and meet our social and environmental standards.

Governance



Business policies

We pride ourselves on taking care to create a positive work environment for our employees. We do this by making our five core values, one of which is kindness, part of Ooni’s DNA and central to every decision we make.

We are in the process of updating the following human rights related policies and procedures to provide the best possible protection for our employees. We will complete this update by mid 2023:

- *People Handbook*
- *Whistleblowing Policy*
- *Grievance procedure*
- *Discrimination and Harassment Policy (“Valuing Diversity”)*

- *Disciplinary procedure*
- *Anti-bribery and Corruption Policy*
- *Health and Safety Policy*

All new employees are required to read and sign these policies. They are also available for review on our internal HR portal.

Employees

We are passionate about creating an environment where all our employees can flourish.

Employees participate in two main survey types throughout the year - an Employee Net Promoter Score question each quarter and an annual Employee Engagement survey. The results are shared company-wide and used to

shape company practices. Additionally, in 2022, we participated in the Best Companies bHeard employee engagement survey. This survey measures and assesses various workplace factors, including pay, wellbeing and personal growth. We are delighted to have been ranked 36th in the Top 50 Best Large Companies to Work For in the UK and received three-star (World Class) accreditation.

We are also a UK real living wage employer, accredited by the Living Wage Foundation. We have committed to paying all Ooni employees at least the real living wage, with a minimum salary of £25,000 or local equivalent.



#36
 Best Large Company to Work For in the UK



Grievances and whistleblowing

We have a Grievance Procedure in place for our employees, which they can use to report any personal concerns they are not able to resolve with their manager.

We also have a Whistleblowing Policy for all employees, including Senior Managers and Execs; 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 raise human rights concerns through this communication channel. We strive to investigate all reports fairly and, where possible, confidentially. We also seek to provide remediation in the best interests of those affected when required. We will ensure whistleblowers do not receive any reprisals, threats or any other detrimental treatment due to raising a concern in good faith. We will provide feedback to whistleblowers on the

progress and outcome of the case. We are currently reviewing how we can strengthen our whistleblowing procedures, including providing options for external stakeholders to report concerns.

Supply chain policies

Our formal supplier social responsibility programme has now been running for two years. During the first year, we focused on developing key policies and processes. We created a Supplier Code of Conduct which aligns with the Ethical Trade Initiative (ETI) base code¹ and includes sections on management systems, fair, safe and respectful working conditions (incorporating clauses on forced and child labour, living wage, working hours and grievance mechanisms, among others), environmental protection and responsible sourcing of raw materials (including sections on forced labour, cotton and conflict minerals).

Last year we committed to creating a Child Labour Remediation Policy in

preparation for meeting the Dutch Child Labour Due Diligence law, which has since had its scope expanded to cover a broader range of social and environmental issues. We have instead decided to deprioritise this piece of work in favour of a broader reaching Human Rights Policy in 2023 - to help us meet this and other requirements of incoming legislation from around the globe.

In 2022, we aimed to build on and embed our new policies and processes within our new and existing supply chains. Due to our rapid growth and the necessity to bring on board more suppliers to help us meet customer demand, we did not comprehensively implement our supplier social responsibility programme across all our supply chains to the extent we would have liked.

Last year, we developed a Manufacturing Agreement for hard goods suppliers and a Supply Agreement for our groceries suppliers, both with a clause requiring compliance with our Supplier Code of Conduct.

Policies 2023 commitments



Formalise Regenerative Business programme reporting to the Ooni Executive Team and Board

Develop a business wide Human Rights Policy

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

Due diligence

According to the latest research by ILO in 2022, the number of people in forced labour has significantly increased to 27.6 million over the past five years². This rise can be attributed to various factors such as armed conflicts, the climate emergency and the pandemic. Modern slavery is prevalent in all regions and sectors. As a global business that sources products from multiple countries and industries, we must be more vigilant as we expand our business and supply chains. We understand that workers in our growing groceries supply chain and migrant and contract workers in our wider direct and indirect supply chains are at an increased risk of exploitation. Therefore, we will prioritise supporting and protecting these workers in 2023.

New suppliers and factories

Our newly formed Sourcing team have been working with colleagues across the business to develop a streamlined supplier onboarding process. Through this new approach, we aim to improve our relationships with suppliers by establishing clear communication and Ooni standard requirements. We plan to test the new process in early 2023 and then

implement it with new suppliers moving forwards.

We want to build collaborative, lasting relationships with suppliers who demonstrate genuine respect for human rights, animal welfare, the planet and business integrity and transparency. We therefore provide support and guidance to suppliers willing to improve continuously and inspire positive change throughout their supply chains.

Existing suppliers

In 2022, around 95% of our direct spend³ was with Chinese suppliers, as a result we prioritised trialling our supplier social responsibility programme with this supply base.

We require all our existing Chinese suppliers to provide us with a SMETA 4-Pillar audit every year. One of our retailers also undertook its own ethical audit of a selection of our Chinese supply base in 2022, providing us with additional due diligence which we have used to strengthen supplier social compliance.

Over the last year, our Sourcing team's focus on our rest of world suppliers has been on

supply base expansion. Next year we will roll out our social responsibility programme to key suppliers in other regions.

Remediation

Once we receive an audit report, we grade the audit report and work with the supplier to identify root causes for their non-compliances and closely support them to implement improvement plans. In China, our Supplier Quality Manager has monthly progress calls with each supplier and visits the sites several times a year to provide additional assistance to meet our standards.

Indirect suppliers

In 2022, we started to bring higher-risk indirect suppliers under our supplier social responsibility programme. Our initial focus has been on our third-party-operated distribution centres. Due to our growing product and customer base, over the past year we have increased the number of distribution centres we use to 23. In the current economic and political climate, migrant and contract workers are at even greater risk of exploitation within warehousing supply chains.

2 ILO (2022) Global Estimates of Modern Slavery: Forced Labour and Forced Marriage https://www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm

3 This is spend with direct suppliers, please refer to table on P4.

Due diligence 2023 commitment



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.

Risk assessment

Suppliers

Our risk assessments include desk-based research and mapping, external audits, interviews, internal site visits, and supplier and stakeholder engagement. Our internal teams and external organisations, such

as human rights specialists, The Reassurance Network, conduct assessment activities. We are currently in the process of joining SEDEX, the world's largest data platform for supplier assessments. We plan to utilise their mapping, risk assessment and compliance reporting tools.

When we commission our own supplier assessments, we ask our audit company to report on any issues found that correlate with our modern slavery indicator list, which is based, in part, on the ILO's Modern Slavery Indicators. A condensed version of this list is provided below:

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

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. We will continue to undertake due diligence with our Chinese suppliers and monitor the situation.

Operations

We believe the risk of modern slavery is low within our direct

business operations as 99% of the people that work for Ooni are employed directly by us and are on permanent contracts. Our outsourced customer service team and the agency workers at our distribution centres, may be at greater risk of modern slavery due to the nature of their employment. We will focus our efforts on better understanding the employment circumstances of these workers in 2023.

Risk assessment 2023 commitments



Continue to carry out ongoing due diligence on forced labour risks.

Carry out due diligence in priority areas of direct spend.

Risk assess outsourced customer service operations.

Training and capacity building

Employees

In 2022, our People team created a new employee onboarding process, with a section on Regenerative Business. In 2023, we will develop modern slavery training to key employees and our Senior Leadership Team.

Suppliers

Our China team organises individual capacity building

sessions with our suppliers throughout the year.

They support sites to improve manufacturing standards and implement Ooni's social responsibility remediation programmes.

Before we embark on a training and capacity building programme for our broader supply base, we need to understand better who our suppliers are, their level of performance across several

areas and what challenges they face. In the context of rapid supply chain growth in 2022 (both in numbers and types of suppliers), we have not had the resources to do this. By the end of 2023, once we have undertaken more supplier mapping and audits, we will have a clearer idea of the kinds of training and support the various suppliers within our supply chains need. We can then develop training programmes to meet their unique requirements.

Training 2023 commitments



Develop modern slavery training to train key employees and our Senior Leadership Teams.

Expand employee onboarding content to include a specific section on modern slavery.

Effectiveness of our approach

To help us prepare for the increased levels of supplier transparency and due diligence evidence required by incoming legislation, we have been expanding the functionality of our supplier database. Going forwards, we will explore ways to integrate supplier information into our central business management system and will look to capture more information, particularly

through our membership of SEDEX, that will help us to track and manage risk, including potential indicators of modern slavery. We will then be able to report publicly on the outcome and effectiveness of our due diligence and risk assessment activities.

We recognise that our substantial business growth and the resultant pull on

our resources during 2022 have impacted our ability to meet some of our modern slavery commitments from last year. Indeed, some of these commitments are no longer relevant, given our changing operational environment and the current international climate.

Effectiveness of our approach 2023 commitment



Continue to develop supplier database functionality to store further sustainability information.

2022 Progress Update

Activity	2022 Commitments	2022 Commitment Status
Supply Chain Mapping	<ul style="list-style-type: none"> • Map groceries suppliers • Complete mapping and risk assessment of Tier 2 and logistics suppliers • Map Tier 3 and Tier 4 suppliers 	<ul style="list-style-type: none"> • Partially completed - Mapped out distributors, suppliers and country of origin • Partially completed - Mapped distribution centres, risk assessment was not completed • Not started - Resources were put into bringing on board new suppliers that reflected Ooni values, deprioritising mapping lower-tier suppliers as a result
Database	<ul style="list-style-type: none"> • Develop supplier database to store further sustainability information 	<ul style="list-style-type: none"> • Partially completed - Database was developed and maintained but fragmented for different supplier types and departments
Policies	<ul style="list-style-type: none"> • Roll out the Supplier Code of Conduct to our wider supply base, including mapped Tier 2 and logistics suppliers • Develop a Child Labour Policy which includes remediation guidelines • Review grievance and whistleblowing procedures • Review and strengthen our employee human rights related policies 	<ul style="list-style-type: none"> • Partially completed - Code was translated and fully rolled out to all Tier 1 China suppliers. It was partially rolled out to ROW suppliers and was not rolled out to Tier 2 or logistics suppliers • Not started - Deprioritised due to wider legislative changes, we will instead focus on publishing a Human Rights policy in 2023 • Partially completed - Whistleblowing procedure was reviewed and developed in 2022, for early 2023 roll-out. Grievance procedure remains in place but has not been changed • Partially completed - Work started in 2022 on internal policies and procedures as well as a wider compliance programme, this will continue into 2023
Contracts	<ul style="list-style-type: none"> • Update the Supplier Contractual Agreement to include a clause on compliance with the Supplier Code of Conduct and specific clauses on zero tolerance towards modern slavery 	<ul style="list-style-type: none"> • Complete - Developed a Manufacturing Agreement for hard goods suppliers, with clause on compliance with our Supplier Code of Conduct included

<p>Governance</p>	<ul style="list-style-type: none"> • Formalise reporting to Ooni Executive team and Board on Impact strategy, including on human rights and supplier compliance 	<ul style="list-style-type: none"> • Partially completed - The Ooni Executive Team and Board received regular Regenerative Business reporting in 2022. It was decided that the formalisation and deeper focus on human rights and supplier compliance would be put on hold until the arrival of a new Head of Regenerative Business and subsequent strategy build-out in 2023
<p>Due Diligence and Risk Assessment</p>	<ul style="list-style-type: none"> • Finalise and formalise supplier social responsibility programme processes across all regions • Start to explore options for beyond audit programme • Implement new supplier onboarding processes for ROW product suppliers and distribution centres • Conduct due diligence on our Chinese suppliers to ensure Uyghurs are not working under forced labour conditions • Risk assess distribution centres and our outsourced customer service workers and the agencies that supply workers into them. 	<ul style="list-style-type: none"> • Not started - Delays due to changes in supply base, capacity and growth. On hold until the arrival of a new Head of Regenerative Business and subsequent strategy build-out in 2023. • Not started - Due to priority re-assessment in 2022. • Partially completed - Newly created Sourcing team started the re-development of our supplier onboarding process - with a focus on direct hard goods suppliers. The implementation for ROW product suppliers and DCs was not started in 2022 • Ongoing - Conducted checks to ensure Uyghurs were not working under forced labour conditions in our Chinese supply chain • Partially completed - Initial risk assessment started at distribution centres, to be continued in 2023. Outsourced customer service workers risk assessment planned for early 2023
<p>Training</p>	<ul style="list-style-type: none"> • Run modern slavery training for key employees and Senior team • Establish a process to provide ongoing training to new starters with supply chain responsibilities on Ooni's supplier social responsibility programme and its modern slavery prevention approach • Develop modern slavery training and train key employees 	<ul style="list-style-type: none"> • Not started - Rolled over as a 2023 priority • Partially completed - In review with creation of Sourcing team - responsibilities and governance to be formalised in 2023 • In progress – Ethical trade training provided to 13 employees

2023 Commitments Summary

Our regenerative business strategy, currently under development, is the primary framework we will use to manage Ooni's social and environmental impacts going forward. It will define how we assess, measure and address human rights risks within our value chains, drawing on the UN Guiding Principles of Business and Human Rights.

We recognise that Ooni has grown significantly in revenue and its range of products. As

a result, we need to assess all potential risks and establish clear policies that can guide procurement activities across the entire company. Since multiple teams currently handle these tasks, we must develop proper governance, policies and procedures to ensure company-wide alignment.

Having taken stock at the end of 2022, we are focusing on a smaller number of core foundational commitments for 2023 to support our long-

term success while responding quickly to emerging risks as needed.

Commitments from previous years that have yet to progress as far as we would like will be prioritised in 2024 or picked up in later phases of work as part of our wider strategy.

2023 commitments



Structure, business and supply chains

- Advance full mapping of Tier 1 suppliers across all categories



Policies

- Formalise Regenerative Business programme reporting to the Ooni Executive Team and Board
- Develop a business wide Human Rights Policy



Due diligence processes

- 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.



Risk assessment

- Continue to carry out ongoing due diligence on forced labour risks
- Carry out due diligence in priority areas of direct spend
- Risk assess outsourced customer service operations



Training and capacity building

- Develop modern slavery training to train key employees and our Senior Leadership Team.
- Expand employee onboarding content to include a specific section on modern slavery



Effectiveness of our approach

- Continue to develop supplier database functionality to store further sustainability information

This statement was approved by Ooni Limited Board of Directors on 22nd June 2023.



For more information

For more information on our impact roadmap, please see ooni.com/impact

