



Modern Slavery Statement 2024

PUBLISHED MAY 2025



ABOUT THIS REPORT: Ooni Limited's fifth Modern Slavery Statement has been written in compliance with reporting requirements mandated by the following legislation:

- California Transparency in Supply Chains Act 2010
- UK Modern Slavery Act 2015
- Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023

The Statement outlines the human rights, including modern slavery and child labour, prevention activities, challenges and progress Ooni Limited and its subsidiaries have made during the last financial year, spanning from 1 January 2024 to 31 December 2024.

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Introduction

Ooni has set an ambitious goal of becoming a regenerative business by 2050. This means we aim to create conditions that allow all life to thrive. We want to go beyond just avoiding harm to people and the planet; we strive to achieve a net positive effect, ultimately fostering restorative and regenerative impacts.

Since announcing our ambition in 2022, we have focused our efforts on developing our Regenerative Business Strategy, which we launched this year. This strategy consists of nine main pillars, each with a specific goal and a set of targets that support that goal.

Through our Regenerative Business Strategy, we will actively seek opportunities to promote and support human rights throughout our business and supply chain through our People and Supply Chain pillars. Recognising that our operations may negatively impact stakeholders, we strive to respect and remedy human rights per the United Nations Guiding Principles on Business and Human Rights. We do not tolerate modern slavery in any part of our business or supply chain, which includes forced and child labour as well as human trafficking. We are continuing to strengthen our due diligence mechanisms to ensure we can identify and prevent human rights abuses.

Signed



Darina Garland,
Co-CEO & Co-Founder



Kristian Tapaninaho,
Co-CEO & Founder

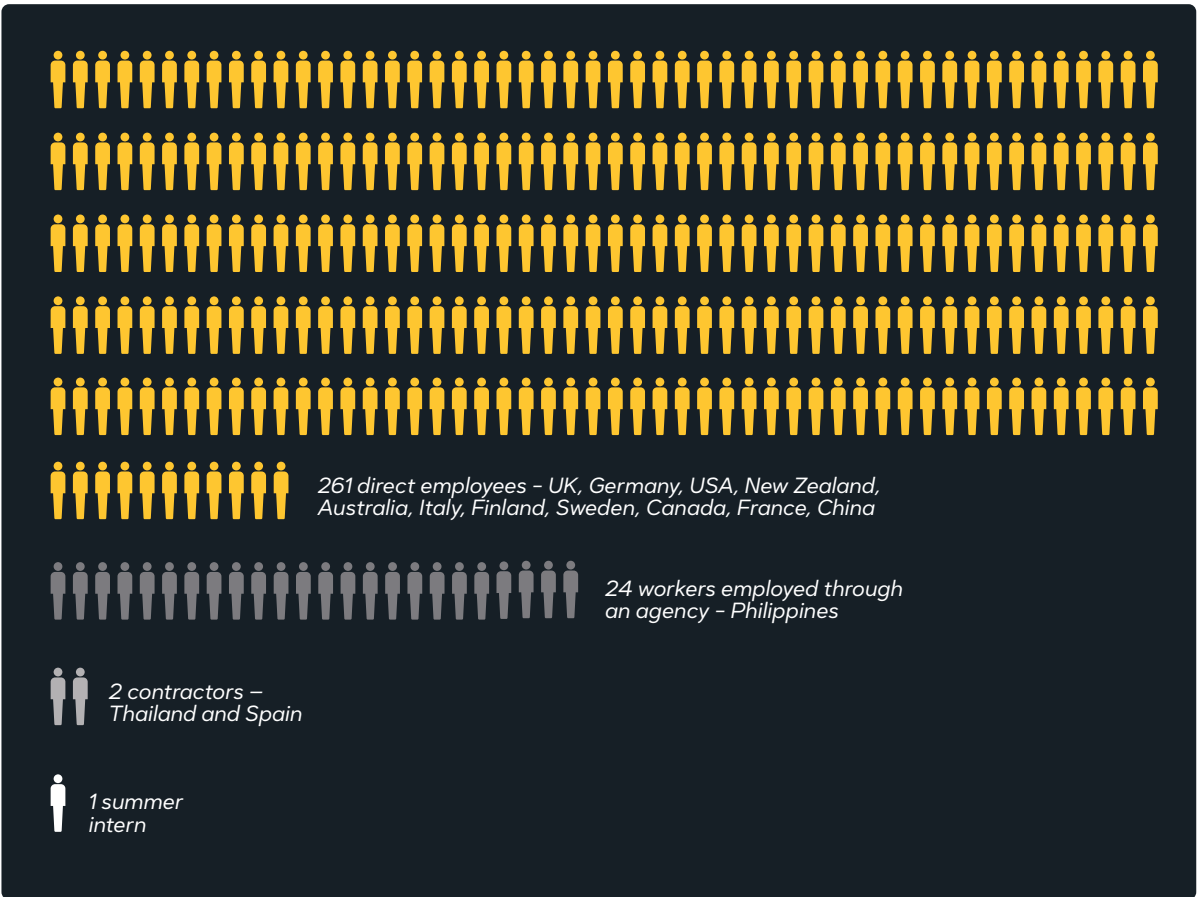


Structure, business and supply chains

Our business



Our workforce



All graphic information is accurate as of the end of Ooni’s financial year, 31 December 2024

Business operations and suppliers



Operations

UK	2 offices - Broxburn & Edinburgh (178 employees) and 2 UK distribution centres
Germany	Bonn office (10 employees)
USA	Austin office (51 employees) and 5 US distribution centres
Canada	(5 employees - based remotely) and Canada distribution centre
Netherlands	EU distribution centre
Philippines	Outsourced customer service (24 workers)
Thailand	Customer service (1 worker)
China	2 offices - Shanghai & Guangdong (5 employees)
Australia	Melbourne office (5 employees) and Australia distribution centre
New Zealand	Dunedin office (1 employee) and New Zealand distribution centre
Sweden	2 employees
Spain	1 contractor
Finland	1 employee
France	3 employees

Key Direct Suppliers (providers of finished products for retail)

China	Majority of ovens and accessories, apron, gloves, notebook, toys
UK	Dough trays, firestarters, wood logs, wood pellets, groceries products
USA	Wood pellets, groceries products
Italy	Groceries products
Hungary	Groceries products
Lithuania	Wood logs
Greece	Groceries product
Spain	Groceries product
Czech Republic	Cookbook
Canada	Licensed groceries products

All graphic information is accurate as of 31 December 2024.

About Ooni

Ooni is a leading designer and retailer of pizza ovens, pizza-making accessories, ingredients, oven fuels, books and branded merchandise.

Ooni Limited is a privately owned limited company established in 2012 and 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. The business strategy, finances and overall management are overseen by our Board of Directors and Executive team, which includes 2 co-CEOs. Our operations are carried out by a team of 261 employees¹, 2 contractors, and 24 agency workers who are all collectively

located across 14 different countries and organised into 14 main departments.

Ooni Limited wholly owns 10 subsidiaries, which are located worldwide² and sell in 97 countries. The purpose of the subsidiaries is to market and sell Ooni products in their respective regions.

Ooni’s supply chain

Our products are designed by our team in Scotland and produced by third-party manufacturers. The majority of our ovens, pizza-making accessories and merchandise are made in China. Our groceries and oven fuels come from Europe and the US. After production, Ooni’s products are shipped to distribution centres around the world³. We serve customers in 97 countries across the globe through our 9 e-commerce

sites in Europe, the US, Canada and Oceania, along with various Amazon marketplaces and a network of retail and distribution partners⁴.

We classify our suppliers into two categories: direct and indirect suppliers. Direct suppliers are those who manufacture and supply the products that we sell to our customers. Indirect suppliers provide us with various goods and services that support our overall business operations. In 2024, direct suppliers made up 33% of our supplier spend whilst indirect suppliers made up 67%. Our Tier 1 direct suppliers are located in at least 7 different countries and include sourcing agents and manufacturing sites involved in assembling or producing our hard goods, groceries, fuels, apparel, merchandise and packaging.

Ooni supplier categories

Supplier Category	Sub-category	Detail
DIRECT	Hard goods	Includes ovens and pizza-making accessories. Procured via 3 sourcing agents and 16 suppliers, and manufactured or assembled across 26 sites.
	Groceries	Non Ooni Brand UK groceries range procured via our UK-based distributor from EU countries and the UK. Non Ooni Brand US groceries range procured via our 2 US-based distributors. Ooni Brand groceries range procured via 12 suppliers based in Italy, the UK and the USA. Ooni Licensed products produced in partnership with 4 licensees in the UK, Canada 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, office cleaning, and other professional services.

¹ Including 5 in Canada
² This includes a Canadian subsidiary
³ In Canada, we have a licensing partner that creates Ooni-branded frozen dough; none of our raw materials or other products are sourced from Canada.
⁴ Including some based in Canada.

Policies

Dedicated teams

Our Regenerative Business team manages the implementation of our Regenerative Business Strategy, which includes

the following two relevant human rights pillars:

People – We create diverse workplaces where our teams can thrive and realise their full potential.

Supply Chains – Our supply chains are ecologically restorative, socially just and inclusive.

Regenerative business goals



1

Climate

We go beyond net zero to ensure our value chain captures more greenhouse gases than it emits



2

Water

We protect and replenish the water sources we use at our own sites



3

Local Environment

We enhance the areas around our sites, helping nature, animals and communities to thrive



4

Products

We apply fully circular design principles and processes to ensure our products create zero waste and help the transition to a circular economy



5

Waste and Pollution

There is no waste or pollution from any of our sites



6

People

We create diverse workplaces where our teams can thrive and realise their full potential



7

Supply Chains

Our supply chains are ecologically restorative, socially just and inclusive



8

Brand Voice

We use our voice to help the transition to a future where regenerative mindsets and practices are commonplace



9

Finance

Our investment and tax payments align with our regenerative ambition

Departments



OUR MANAGEMENT STRUCTURE DIVIDES THE BUSINESS INTO 14 DEPARTMENTS:

- E-commerce & Software
- Finance
- Groceries (*responsible for groceries and merchandise*)
- IT & Systems
- Legal
- Logistics
- Brand Marketing
- OX (*Customer Services*)
- People & Office
- Planning
- Project Management Office (PMO)
- Product (*including New Product Innovation (NPI)*)
 - Product Delivery,
 - Product Compliance,
 - Sourcing (*responsible for hard goods and fuels*),
 - Product Category Management,
 - Packaging
- Regenerative Business
- Sales

Governance



OONI EXECUTIVE TEAM AND BOARD

Quarterly meetings to discuss Regenerative Business progress, including human rights

CHIEF OPERATING OFFICER (COO)

Responsible for human rights at Ooni

REGENERATIVE BUSINESS

Quarterly written reports on the progress of our Regenerative Business strategy

PRODUCT COMPLIANCE

SALES

SOURCING

Ooni teams that are jointly responsible for the development and implementation of human rights due diligence

Business policies

At Ooni, we are committed to treating our employees fairly and equitably and helping them to thrive. We achieve this through our company culture and a suite of formal policies.

Our Employee Handbook and Policies and Procedures

document contain a wide range of policies designed to protect our employees throughout their time at Ooni. Some of the most relevant policies related to human rights include:

- Anti-Bribery and Corruption Policy
- Anti-Harassment & Bullying
- Disciplinary Procedure

- Equity, Diversity & Inclusion (EDI) (*New*)
- Flexible Working
- Health and Safety Policy
- Human Rights Policy (*to be rolled out*)
- Sexual Harassment (*New*)
- Whistleblowing Policy
- Grievance Procedure

We recently reviewed and updated both documents, and we plan to publish them internally at the start of 2025. All new employees will be required to read and sign these policies, which will also be accessible for review on our internal HR portal.

Last year, we developed a Human Rights Policy but have postponed its publication until it can be aligned to include more detailed information on our Human Rights Due Diligence (HRDD) framework, which is currently under development (see Due Diligence section).

Grievances and whistleblowing

We have implemented a Grievance Procedure for employees to voice any concerns that they may not be able to handle directly with their managers.

Additionally, our Whistleblowing Policy is designed to protect all individuals working with Ooni, including senior managers, executives, agency staff, consultants, volunteers, interns, contractors, and anyone else providing services to us. We encourage everyone to utilise the channels specified in this Policy to bring forward any human rights issues they may encounter. We are dedicated to investigating all reports with fairness and, when possible, confidentiality. Our focus is on providing appropriate remedies that serve the best interests of those impacted. We commit to ensuring that individuals raising concerns in good faith will not experience retaliation, threats, or any form of negative treatment. We also seek to keep whistleblowers updated regarding the status and results of their reports.

Employees

We run our quarterly Employee Net Promoter Score survey to assess job satisfaction. The results are shared company-wide and continue to shape company practices. We pay our teams around the world a real living wage that reflects the actual cost of living, with a minimum salary of £25,000 or equivalent for all Ooni employees globally. We also continue to be a UK real living wage employer, accredited by the Living Wage Foundation. In 2024, we were proud to be named one of Built In's Best Midsize Companies to work for in Austin, highlighting our workplace culture, compensation and benefits for the second consecutive year.

Supply chain policies

We also seek to ensure our direct and indirect suppliers treat their workers well.

Our Supplier Code of Conduct



Our Supplier Code of Conduct, which aligns with the Ethical Trade Initiative (ETI) base code⁵, 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
- Responsible sourcing of raw materials (including sections on forced labour, cotton and conflict minerals).

Our finished products suppliers based in China have all signed our Supplier Code of Conduct – compliance with the Code is required as part of our Manufacturing and Supply Agreement.

In 2024, we began developing our Supplier Manual for hard goods suppliers. This manual clearly outlines Ooni's operational standards and the expectations we have of our suppliers. It

emphasises the importance of compliance with all policies and processes. Additionally, the manual includes ethical and sustainability guidelines.

⁵ <https://www.ethicaltrade.org/eti-base-code>

Due diligence

We recognise our shared responsibility for the human rights impacts associated with the production and distribution of the goods and services we depend on. Historically, our efforts have concentrated on our China-based suppliers, as this is where the majority of our direct spending occurs. Drawing from the lessons learned in our China-based programme, and following the early stage development of our HRDD framework and the results from our ongoing supply chain mapping exercise, we are preparing to extend our due diligence efforts to suppliers outside of China.

Supply chain mapping

To carry out effective human rights due diligence across our entire supply chain, we need to both gain visibility of and keep track of our supply chain down to the raw material level. In 2023, we started the Third Party Data (TPD) project, to develop systems and processes to better gather, store and report on core financial, social and environmental information about our third parties (including customers and suppliers). During 2024, the Regenerative Business team worked on building the business case for centralised supplier data. To support the TPD project implementation, we established an employee incentive-linked goal as part of the company-wide profit-sharing scheme for 2025. We have set 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

Human rights due diligence (HRDD) framework

In 2024, we advanced our HRDD framework, aligning it with international standards such as the UN's Guiding Principles on Business and Human Rights, the OECD Guidelines for Responsible Business Conduct and the Future Fit Business Benchmark. Our HRDD framework will help identify and address social risks in our supply chains, ultimately aiming to eliminate harm and create regenerative systems. Environmental risks will be integrated into the framework at a later stage. Although we faced resource constraints that delayed its finalisation, we successfully drafted initial risk assessment stages, incorporating feedback from human rights experts. One of our commitments for 2025 is to finalise the framework.

Guidance for internal teams

While we develop our HRDD framework, we have established interim guidelines for our internal teams to manage our largest group of direct suppliers—those producing hard goods in China. The guidelines ensure we can better manage the human rights risks associated with this group of suppliers, enhance our ability to meet our retail partners' requirements and lay the groundwork for the rollout of our finalised HRDD framework.

New suppliers and factories

We understand the importance of transparent communication and building strong relationships with suppliers to improve human rights performance. Our hard goods new supplier onboarding process involves:

- Holding 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.
- Requiring 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. It was not necessary for us to conduct any of our own audits in 2024.

Existing suppliers

We require all our existing direct 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 and conducts several site visits throughout the year to offer additional assistance.

We have also created a tailored supplier Self Assessment Questionnaire (SAQ) which we will be trialling with our groceries suppliers in early 2025. Following a risk assessment of supplier responses, we will work with

our grocery partners to drive improvements, where necessary.

Indirect suppliers

We continue to address key risks associated with indirect procurement. We recognise that logistics services can present human rights risks, such as long working hours and health and safety concerns. To identify and mitigate these risks, we have integrated social and environmental criteria into our

screening process for freight forwarding suppliers. In 2025, we will focus on our distribution centers, which pose risks due to demand pressures and the nature of the workforce, often consisting of migrants and agency workers. We plan to send our 11 third-party operated distribution centres our newly developed SAQ and request audit reports. These reports will be used to assess any potential human rights risks and establish follow-up plans.

After conducting a risk assessment of our outsourced customer service provider with the input of an external human rights expert and due to some internal changes, current arrangements for these services are under review. We expect to finalise these during 2025, considering the risk assessment findings as applicable.

Risk assessment and management

We utilise a diverse range of sources to identify human rights risks. Our approach includes thorough desk research, analysis of third-party ethical audits, interviews with workers, site visits by our internal teams and consultations with human rights experts. We are also members of SEDEX, and employed their tools, such as RADAR, to identify risks associated with both new and existing suppliers throughout 2024. Once completed, our HRDD framework will serve as the primary mechanism for managing these risks.

Supply chain

As a global organisation, we source various components,

ingredients, and products from numerous countries and industries where there are known issues of worker and child exploitation, along with other serious human rights violations. Our supply chain is where we have the most significant impact on human rights; therefore, we concentrate our efforts on assessing and managing these risks. This involves identifying challenges faced by migrant and contract workers in our grocery and distribution supply chains, who are particularly vulnerable to exploitation.

We continue to monitor 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, other materials or products from factories in XUAR.

Operations

In our direct business operations, we assess the risk of modern slavery to be minimal, as 99.2% of our Ooni workforce consists of employees on permanent contracts. The remaining 0.8% are on fixed-term contracts.

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 in the best interests of those affected.

Depending on the severity and nature of the issue, we may seek to collaborate with the affected individuals, relevant teams, management and external specialists. In cases involving supply chain impacts, we will also engage with the agent or supplier, factory, and local

communities and organisations to address any identified issues.

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 2024.

Training

Employees

All new employees receive information about our Regenerative Business strategy, as well as an introduction to human rights and modern slavery during their onboarding process.

In 2024, we developed human rights training specifically designed for our Executive team. We held two mandatory one-hour sessions for 10 employees, which represented 3.8% of the workforce. These sessions provided an overview of human rights, including

topics such as forced and child labour, business human rights best practices and an analysis of Ooni's current position and next steps on our due diligence programme development. There were no assessment elements included in these sessions. We plan to expand this training to the Senior Leadership Team during the next year.

At the end of 2024, we engaged the help of experienced human rights auditors to develop a checklist to help our colleagues who visit supplier sites to raise their awareness of human

rights risks. This checklist will guide them in identifying potential human rights abuses. Additionally, we may provide training on how to effectively use the checklist and report any concerns they may encounter. The checklist will be finalised and operationalised in 2025.

Suppliers

Once we have completed our TPD and HRDD framework projects, we will be able to more effectively identify the training needs of our suppliers and formulate a plan to support them.

Assessing the effectiveness of our approach

Modern slavery is one of the most pressing crises of our time, with 27.6 million⁶ people in forced labour as reported by the International Labor Organization in 2021. Additionally, around 160 million children were engaged in child labor at the start of 2020, representing nearly 1 in 10 children worldwide⁷. This issue is worsened by poverty, migration, geopolitical conflicts and climate change.

We recognise the need to enhance our systems to better identify potential or actual incidents of modern slavery and child labour. This need is underscored by the rising occurrence of modern slavery, the results of our risk assessments, and the fact that our due diligence to date has not yet uncovered any instances of forced or child labour.

In 2023, we formed a Core Compliance Team (CCT) to proactively monitor current and future legislation and ensure we have adequate systems and processes in place to help us comply – this includes incoming human rights and modern slavery legislation.

⁶ <https://www.ilo.org/resource/news/50-million-people-worldwide-modern-slavery-0>

⁷ <https://www.ilo.org/publications/major-publications/child-labour-global-estimates-2020-trends-and-road-forward>

2024 Progress Update

Activity	2024 Commitments	2024 Commitment Status
Structure, business and supply chains	<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 	<ul style="list-style-type: none"> Ongoing – Progress made on Tier 1 supplier mapping. Ongoing for 2025, as part of the TPD project under Effectiveness of our Approach commitment
Policies	<ul style="list-style-type: none"> Communicate Human Rights Policy internally and externally 	<ul style="list-style-type: none"> In progress – Delayed publication until policy can be aligned with our HRDD framework, which is currently under development
Due diligence processes	<ul style="list-style-type: none"> Finalise HRDD framework 	<ul style="list-style-type: none"> In progress – Delayed due to team resource constraints
Risk assessment and management	<ul style="list-style-type: none"> Continue to carry out ongoing due diligence on our most salient human rights risks within our supply chain 	<ul style="list-style-type: none"> In progress – Progress has been made in grocery and logistics supply chains
Training	<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 	<ul style="list-style-type: none"> Completed – Human rights training was successfully delivered to the Executive Team In progress – Work on tools and guidance has started and will be operationalised in 2025
Effectiveness of our Approach	<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 	<ul style="list-style-type: none"> Ongoing – The business case for an integrated third-party data system was developed, and an associated employee incentive was established for 2025

2025 Commitments Summary

In 2025, we will continue to focus on a set of core commitments that will strengthen our human rights programme and support our long-term modern slavery prevention success.

Several of these commitments have been extended from 2024, owing to limitations in team resources.

2025 commitments



Business structure and supply chains

- Progress supplier mapping, specifically:
 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



Policies

- Communicate our Human Rights Policy internally and externally



Due diligence processes

- Finalise our HRDD framework



Risk assessment & management

- Continue to carry out ongoing due diligence on our most salient human rights risks within our supply chain



Training

- Deliver human rights training to key Ooni employees
- Develop human rights guidance and tools for Ooni employees visiting supplier sites



Effectiveness of our approach

- Continue to invest in third-party 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 Labour & Child Labour in Supply Chains Act, and in particular section 11 thereof,

we attest that we have reviewed the information contained in the report for the 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 within this report.

We have the authority to bind Ooni Limited.

Signed
Darina Garland,
Co-CEO & Co-Founder
Member of Ooni Board of Directors
19 May 2025

Signed
Kristian Tapaninaho,
Co-CEO & Founder
Member of Ooni Board of Directors
19 May 2025

This statement was finalised in March 2025 and approved by the Ooni Limited Board of Directors in May 2025

For more information

For more information on our Regenerative Business Strategy, please see ooni.com/impact

