



Modern Slavery Statement 2021

June 2022

Introduction

This, Ooni Limited's second Modern Slavery Statement, has been published in accordance with section 54 of the UK Modern Slavery Act 2015 and section 3 of the California Transparency in Supply Chains Act. We welcome the ongoing movement towards mandatory human rights and environmental reporting and due diligence in a number of countries worldwide.

In this Statement we explain the progress Ooni Limited and our subsidiaries, Ooni, Inc., Ooni GmbH and Ooni SAS (herein known as 'Ooni'), have made towards identifying and preventing modern slavery and human trafficking within our business and supply chains. It provides an update on the activities and commitments detailed in our first Modern

Slavery Statement and the additional steps we have taken from January 2021 to December 2021. The summary table at the end of this Statement provides a review of our progress over the last year. It also outlines our 2022 commitments.

Ooni does not tolerate any form of modern slavery anywhere within our business or supply chains. Modern slavery encompasses the worst forms of labour exploitation and human rights abuses, including slavery, servitude, forced and compulsory labour and human trafficking. We are committed to ensuring the human rights of people working within our operations and supply chains around the world are respected and protected, in alignment with the UN Guiding Principles on

Business and Human Rights.

Over the last year, we have further strengthened our commitment to prioritise the planet and people within our decision making by reviewing and aligning our business operations and articles of association with B Corp criteria. We have now submitted our application to become a B Corp certified business and hope to become accredited in the next year. We will continue to use B Corp certification as a vehicle to drive us towards sustainability best practice. We also joined the Better Business Act Coalition to add our voice to the growing call for a change in UK law to ensure every company takes ownership of its social and environmental impact.

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 2021

Our business

Ooni Limited, founded in 2012, is a private limited company registered in England and Wales under the registration number 08316049. We are headquartered in Broxburn, Scotland with offices in Austin, US and Bonn, Germany. We employ 242 people globally, including 3 colleagues in China who work from home. We use 6 third-party operated warehouses located in the UK (2 warehouses), Netherlands (1 warehouse) and the US (3 warehouses). We also have outsourced customer service operations in the Philippines (contracting 11 workers),

Thailand (contracting 1 worker) and Australia (contracting 1 worker).

Ooni Limited is a privately owned company, and its shareholders are Magic Foundry Limited (which is wholly owned and controlled by Kristian Tapaninaho and Darina Garland), Simon Fry and Kevin Quinn. Ooni, Inc. (USA), Ooni GmbH (Germany) and Ooni SAS (France) are 100% owned subsidiaries of Ooni Limited.

Our products

Ooni is a leading designer, manufacturer and retailer of pizza ovens. We also sell pizza

making accessories, oven fuels, books, clothing merchandise and groceries (dough balls and pizza ingredients). Our products are designed and engineered by our team in Scotland and manufactured via third-party manufacturing partners in factories predominantly located in China. These are then shipped to warehouses in the Netherlands, the UK and the US. Our products are sold in over 48 countries worldwide - through our own e-commerce websites in Austria, France, Germany, Italy, EU, UK and the US, and through Amazon and a network of retail and distribution partners.

Ooni supplier tiers

- 0** Sourcing agents (groceries distributor, clothing merchandising agents)
- 1** Finished product manufacturers/assembly (ovens and accessories, groceries, t-shirts, hats, packaging)
- 2** Component manufacturers (valves, burner, rivets)
- 3** Raw material processors (smelters, spinners)
- 4** Raw material suppliers (agricultural, animal, metal, cotton)

Production suppliers

We have 37 Tier 1 production suppliers, defined as sites manufacturing the whole finished Ooni product or where the majority of the assembly and packing of products bearing an Ooni label occurs. We have long-standing relationships with many of our Tier 1 suppliers.

Our Tier 1 suppliers are predominantly located in China: we also source from suppliers in Bangladesh, Czech Republic, India, Lithuania, Russia*, Slovenia, UK, Ukraine and the US. In 2021, we launched our groceries range. We buy our grocery goods from

Italy, Hungary, UK and the US through a UK based distributor. We are in the process of gaining more transparency on our grocery supply chain within these four countries to complete our Tier 1 supplier mapping..

One of the commitments we set ourselves for 2021 was to map and risk assess our Tier 2 suppliers. We now have partial transparency on this tier of our Chinese supply base and full transparency of our Rest of World (ROW) suppliers, along with some information on Tier 3 and 4 suppliers. During 2022, we plan to complete Tier 2 mapping. We will then focus our attention on the lower tiers of our supply chain.

Another activity we committed to in 2021 was to implement a database to capture relevant supplier ethical information. We have collated and uploaded key supplier data into a new database. We plan to develop the database functionality to store further sustainability information and modern slavery indicators.

We recognise that our greatest modern slavery risks are located within our production supply chain, so this is where we are currently focusing our efforts.

** Since the Russia-Ukraine war broke out in early 2022, we have ceased all business with Russia.*

Ooni supplier locations



Operations

UK	HQ office at Broxburn and UK warehouse
Germany	Bonn office
USA	Austin Texas office and US warehouses
Netherlands	EU warehouse
Philippines	Outsourced customer service
Thailand	Outsourced customer service
China	China supply chain team (3 employees)

Tier 1 Suppliers

China	Majority of ovens & accessories
UK	Dough trays, fire starters, UK dough balls, selected groceries (suppliers to be mapped)
Italy	Selected groceries (suppliers to be mapped)
Hungary	Selected groceries (suppliers to be mapped)
Lithuania	Logs
Ukraine	Charcoal
Slovenia	Cookbook (Cooking with Fire)
Czech Republic	Cookbook (Cooking with Fire)
USA	Books, wood pellets, selected groceries (suppliers to be mapped)
Russia	Wood pellets
Bangladesh	Hats (produced in 2021 launched in 2022)
India	T-shirts (produced in 2021 launched in 2022)

Logistics and operational suppliers

We use logistics and operational suppliers who provide the following different types of

services: shipping, transport, warehousing, couriers, waste management, packaging, professional services and office cleaning. We had committed to mapping these suppliers in

2021. Unfortunately, we have not had the resources available to commence this project and will revisit this commitment again in 2022.

2022 Modern Slavery Prevention Commitments



Map grocery suppliers.

Complete mapping of Tier 2 suppliers

Start mapping Tier 3 and Tier 4 suppliers. Map and risk assess logistics and operational suppliers

Develop supplier database functionality to store further sustainability information



Policies

Governance

The Chief Operating Officer (COO) is responsible for overseeing Ooni's approach to human rights, ethical trade and modern slavery prevention. Our COO meets with the Ooni Limited Executive Team quarterly to discuss sustainability related issues, including human rights risks.

On a day-to-day basis, our Impact (our name for Ooni's sustainability programme) and Manufacturing teams are responsible for the management of our human rights and ethical trade programme, and for developing and implementing our modern slavery related policies and procedures.

In 2021, we set ourselves a task of establishing a committee and review processes for human rights risks, particularly in relation to supplier performance. Our Impact team now meets fortnightly with our co-CEO and COO to discuss the progress of our Impact programme, including our Social Responsibility pillar which incorporates human rights and our ethical trade programme. Our Impact and Manufacturing teams get together monthly to discuss supplier performance. Our next step for 2022 is to formalise reporting to the board on our Impact and supplier programmes to enable us to further prioritise people and planet when making business decisions.

Business policies

We pride ourselves on creating a positive work environment for the people we employ.

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 have several human rights related policies and procedures in place to protect our employees:

- *People Handbook*
- *Whistleblowing Policy*
- *Grievance procedure*
- *Discrimination and Harassment Policy ("Valuing Diversity")*
- *Disciplinary procedure*
- *Anti-bribery and Corruption Policy*
- *Health and Safety Policy*
- *Living Wage Policy*
- *Impact Policy (includes a section on Social and Ethical Impact, encompassing modern slavery, ethical trade and human and labour rights).*

We are accredited as a UK real living wage employer by the Living Wage Foundation. All Ooni employees are paid at least the real living wage. At the end of 2020, we implemented a minimum salary of £25,000 or equivalent for all employees globally. That's 54% higher than the UK national minimum wage and 45% higher than the Living Wage Foundation's real living wage.

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

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 more serious concerns our employees may have about our business that they are not able to raise directly with their line managers. We encourage anyone within the business to raise human rights concerns through this safe communication channel. We investigate all reports fairly and confidentially, where possible, and provide remediation in the best interests of those affected when required. Whistleblowers will not be subjected to any reprisals, threats or any other detrimental treatment as a result of raising a concern in good faith. We will provide feedback to whistleblowers on the progress and outcome of the case.

Supply chain policies

Our formal ethical trade programme has only been in place for one year. During this period, we focused on building the foundations of a robust programme. A key pillar being the creation and implementation of a Supplier Code of Conduct which we have now rolled out to our Tier 1 suppliers. Our Code 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 and cotton and conflict minerals). Our Code is currently being translated into further key supplier languages. We will roll the Code out to our wider supply base, including mapped Tier 2 suppliers, logistics and operational suppliers and warehouses in 2022.

We are in the process of updating Supplier Contractual

Agreements to include clauses on compliance with Ooni's Supplier Code of Conduct and on zero tolerance towards modern slavery. The next phase of this project is to roll out these amends to our logistical and operational suppliers, including warehouses.

In our last statement, we also committed to start developing

policies to provide increased protection to vulnerable supply chain workers, including a Child Labour Remediation Policy which we plan to complete in 2022.

2022 Modern Slavery Prevention Commitments



Roll out the Supplier Code of Conduct to our wider supply base, including mapped Tier 2 suppliers, logistics and operational suppliers and warehouses



Develop a Child Labour Remediation Policy



Strengthen our grievance and whistleblowing mechanisms



Review and strengthen our employee human rights related policies



Continue updating Supplier Contractual Agreements to include a clause on compliance with the Supplier Code of Conduct and specific clauses on zero tolerance towards modern slavery



Formalise Impact programme reporting to the board

Due diligence

We acknowledge that while modern slavery can exist in all industries, our product supply chains particularly have increased risks due to their geographical locations, the types of vulnerable people working within them and the kinds of raw materials being sourced for our products. The risks have increased further this year as we have expanded our product ranges into two of the highest risk industries for modern slavery: apparel manufacturing (Ooni hats and t-shirts) and agricultural (Ooni groceries). In response, we have grown our China team where the majority of our product suppliers are based, from one to three people. We have also strengthened our supplier onboarding process and put in place more due diligence and risk assessments procedures, including documentation around supplier risk grading and audit procedures and a set of modern slavery indicators, to ensure we mitigate the risks as far as we can.

New suppliers and factories

We have met our 2021 commitment to put in place a more robust new supplier and factory onboarding process for our Chinese suppliers which includes the following steps:

- *Ask the potential supplier or factory to complete a self-assessment questionnaire and return to Ooni, together with any recent ethical audits and other relevant certification including ISO9001 and ISO14001.*
- *Send out our Supplier Code of Conduct, ask the potential supplier or factory to sign and cascade to their own supply chains.*

- *If the site is located in China, ensure one of our colleagues from the China team visit the site to review the facilities, meet the management and explain Ooni's standards and procedures.*
- *Require all potential sites to complete a SMETA 4 Pillar audit which we then grade and work with the supplier and factory to close off any non-compliances.*
- *Follow up with our own audits against Ooni's Code of Conduct, when necessary, to provide us with additional assurance of the site's working conditions – as was the case with a new site in Bangladesh. As part of our Ooni audits, we conduct a modern slavery risk assessment which incorporates key modern slavery indicators as defined by the ILO.*

Now that we have trialled this process in China, we plan to standardise our onboarding process across our ROW supply base.

Existing suppliers

Over the last year, we have been working on our 2021 commitment to require SMETA audits from all Tier 1 and key Tier 2 suppliers and to commission additional audits for all suppliers deemed to be high risk. We now have SMETA audits in place for all Tier 1 China factories and for one Tier 2 site. We commissioned 10 of our own SMETA audits in China; the other sites provided reports for third-party audits that had taken place within the last year. We will follow up with each site on an annual basis to ensure they provide us with an updated SMETA report.

The focus for 2022 will be to continue to collate, review and risk assess audit reports from our Tier 2 and beyond Chinese suppliers over the next year and to roll out our audit programme to our ROW suppliers.

We will also start to explore options for driving long-term supply chain improvements beyond traditional audit mechanisms.

Remediation

Once we receive an audit report, whether the audit was commissioned directly by us or by another of the supplier's customers, 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 updates with each supplier and visits the sites on a quarterly basis to provide additional assistance to meet our standards.

Over the last year, our Manufacturing team focused on supply chain mapping and performing desk-based risk assessments on our existing ROW suppliers, in preparation for roll out of an audit programme in 2022 which will commence with those suppliers we deem to be higher risk.

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 supply chain mapping, we can confirm we do not source cotton or

products from factories in XUAR. Through audits, we have not identified any Uyghurs working under forced labour conditions in our Chinese supply base. We will continue to undertake due diligence with our Chinese suppliers and continue to monitor the situation.

COVID-19

During the last year, we were in regular communications with our suppliers to monitor

how COVID-19 was impacting their businesses and to determine where we could provide further support.

Logistics and operational suppliers

In 2021, we focused our attention on embedding our product supply chain ethical trade programme. During the next financial year, we will start the process of creating a logistics and operational supplier programme. Our initial focus

will be on our warehouses. As our business and product ranges grow and become more global, we require more warehousing options. We recognise that there are risks inherent in our warehousing supply chain for vulnerable workers such as migrant and agency workers. To start to understand and mitigate these risks, we will establish a new warehouse onboarding process and begin to undertake risk assessments of our existing warehouses and the agencies that supply workers into them.

RISK ASSESSMENT

Modern Slavery Risks



Suppliers

Our risk assessments take the form of desk-based research and mapping, external audits and internal site visits and supplier and stakeholder engagement,

and are undertaken by specialists in our internal teams and with external organisations such as The Reassurance Network.

In 2021, we introduced a modern slavery indicator

list, based, in part, on the ILO's Modern Slavery Indicators which we assess supplier audits against to help determine their level of modern slavery risk.

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








Operations

We believe the risk of modern slavery is low within our direct business operations as most 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 warehouses, may be a 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 2022.

2022 Modern Slavery Prevention Commitments

-  **Continue to implement more robust processes in place around our ethical trade programme**
-  **Review options for beyond audit programmes**
-  **Formalise and standardise our new supplier onboarding process with our ROW suppliers & warehouses.**
-  **Collate, review and risk assess audits for all Tier 2 suppliers and set improvement targets**
-  **Roll out our audit programme to ROW suppliers**
-  **Continue to conduct due diligence on our Chinese suppliers to ensure Uyghurs are not working under forced labour conditions**
-  **Risk assess warehouses and our outsourced customer service workers and the agencies that supply workers into them**

Training and capacity building

Employees

Following the completion of our new Supplier Code of Conduct, we decided to broaden the scope of the training we committed to last year beyond modern slavery to cover all the important human rights elements of our Code and our new audit programme.

We invited a human rights expert to spend half a day training 13 of our employees with supply chain responsibilities. The session's objectives were to help participants to develop a better understanding of ethical trade and its main risk areas, Ooni's Code of Conduct requirements,

the SMETA audit process and how to assess SMETA audit reports, supplier compliance challenges and what the supplier remediation process entails.

We run a short overview session on our ethical trade programme for all new starters.

We will provide a more in-depth modern slavery training session to key employees and our Senior Leadership Team in the second half of 2022. We will also look to develop an ongoing process for training and upskilling new starters with supply chain responsibilities on human rights base issues and our policies and Codes.

Suppliers

Before we embark on developing a supplier training programme, we first want to get a better understanding of who our suppliers are, their level of performance across a number of areas and what challenges they face. We believe that by the end of 2022, once we have undertaken more supplier mapping and audits, we will have a clearer idea of the kinds of training and support our various types of suppliers need. We can then develop training programmes to meet their unique requirements.



Develop modern slavery training with external experts to train key employees and Senior Leadership Team

Establish a process to provide ongoing training to new starters with supply chain responsibilities on Ooni's ethical trade programme and its modern slavery prevention approach

Effectiveness of our approach

We are now one year into our formal human rights and ethical trade strategy. We recognise we still have some work to do to develop a robust programme.

This year has been about putting in place key programme pillars such as developing codes, policies, procedures and data capture systems, establishing a supplier onboarding process and ongoing auditing programme and growing our teams and upskilling them. Over the coming years, we will focus on gathering data to help us make

informed decisions that put respecting and safeguarding the rights of our employees, supply chain workers and local communities central to our decision making.

Through our due diligence processes and risk assessment activities against our modern slavery indicators, we have not found any incidents or strong potential modern slavery indicators within our business and supply chains. We have found internal migrant workers within our Chinese supply chain, and, having consulted

with our China team on their working conditions, we feel the risk of modern slavery to be low to these workers.

We have also not received any grievances related to modern slavery and labour rights through our grievance mechanisms. However, we recognise that we must remain vigilant and continue to seek greater transparency of our supply chains and the working conditions present within them so we have the best possible chance of identifying and preventing modern slavery.

2021 Progress and 2022 Commitments Summary

Activity	2021 Commitments	2021 Commitment Status	2022 Commitments
Supply Chain Mapping	<ul style="list-style-type: none"> Map and risk assess Tier 2 and logistics and operational suppliers 	<ul style="list-style-type: none"> In progress – China in progress, ROW mapped 	<ul style="list-style-type: none"> Map grocery suppliers Complete mapping and risk assessment of Tier 2 and Logistics and Ops suppliers Map Tier 3 and Tier 4 suppliers.
Database	<ul style="list-style-type: none"> Implement a supplier database to capture relevant supplier ethical information 	<ul style="list-style-type: none"> In progress – new database in operation, further data to be inputted 	<ul style="list-style-type: none"> Develop supplier database to store further sustainability information

2021 Progress and 2022 Commitments Summary

Policies	<ul style="list-style-type: none"> • Create a Supplier Code of Conduct, translate into relevant languages, roll out to all suppliers and warehouses 	<ul style="list-style-type: none"> • In progress – rolled out to all Chinese suppliers, but delayed for ROW due to translation times 	<ul style="list-style-type: none"> • Roll out the Supplier Code of Conduct to our wider supply base, including mapped Tier 2 suppliers, logistics and operational suppliers and warehouses
Policies	<ul style="list-style-type: none"> • Develop a Child Labour and Remediation Policy and roll out to all suppliers and warehouses 	<ul style="list-style-type: none"> • Not started 	<ul style="list-style-type: none"> • Develop a Child Labour Policy which includes remediation guidelines
Policies	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • Review grievance and whistleblowing procedures
Policies	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • Review and strengthen our employee human rights related policies
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"> • In progress 	<ul style="list-style-type: none"> • Continue to embed clauses into all supplier contracts
Governance	<ul style="list-style-type: none"> • Establish a committee and review processes for human rights risks and supplier performance across all relevant teams 	<ul style="list-style-type: none"> • Complete 	<ul style="list-style-type: none"> • Formalise reporting to board on Impact strategy, including on human rights and supplier compliance
Due Diligence & Risk Assessment	<ul style="list-style-type: none"> • Require SMETA audits from all Tier 1 and key Tier 2 suppliers, commission additional audits for all suppliers deemed to be high risk and set improvement targets 	<ul style="list-style-type: none"> • In progress 	<ul style="list-style-type: none"> • Collate, review and risk assess audits for all Tier 1 & 2 suppliers and set improvement targets. Roll out audit programme to ROW suppliers
Due Diligence & Risk Assessment	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • N/A 	<ul style="list-style-type: none"> • Start to explore options for beyond audit programme

2021 Progress and 2022 Commitments Summary

Due Diligence & Risk Assessment	<ul style="list-style-type: none"> Develop a more formal new supplier onboarding process 	<ul style="list-style-type: none"> In progress – consolidate process across all regions 	<ul style="list-style-type: none"> Implement new supplier onboarding processes for ROW product suppliers and warehouses
Due Diligence & Risk Assessment	<ul style="list-style-type: none"> Develop ethical trade programme processes and procedures 	<ul style="list-style-type: none"> In progress 	<ul style="list-style-type: none"> Finalise & formalise ethical processes across all regions
Due Diligence & Risk Assessment	<ul style="list-style-type: none"> Formalise supply chain modern slavery risk assessment process and map where vulnerable workers may be at risk 	<ul style="list-style-type: none"> In progress - initial mapping of vulnerable workers undertaken 	<ul style="list-style-type: none"> Assess vulnerable workers in supply chains especially with new product lines (groceries and merch)
Due Diligence & Risk Assessment	<ul style="list-style-type: none"> Conduct due diligence on our Chinese suppliers to ensure Uyghurs are not working under forced labour conditions 	<ul style="list-style-type: none"> Ongoing 	<ul style="list-style-type: none"> Ongoing
Due Diligence & Risk Assessment	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Risk assess warehouses and our outsourced customer service workers and the agencies that supply workers into them
Training	<ul style="list-style-type: none"> Develop modern slavery training and train key employees 	<ul style="list-style-type: none"> In progress – Ethical trade training provided to 13 employees 	<ul style="list-style-type: none"> Run modern slavery training for key employees and Senior team
Training	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> Establish a process to provide ongoing training to new starters with supply chain responsibilities on Ooni's ethical trade programme and its modern slavery prevention approach

This statement was approved by Ooni Limited Board of Directors on 21 June 2022.

Signed:



Darina Garland
Co Chief Executive Officer
21 June 2022



**SOCIAL
RESPONSIBILITY**



TRANSPARENCY

This document forms part of our commitment to social responsibility and transparency.

For more information

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

