

Modern Slavery Statement

May 2021



Introduction

Ooni Limited and our subsidiaries, Ooni, Inc. and Ooni GmbH (herein known as 'Ooni') 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.

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 acknowledge that while modern slavery can exist in all industries, our 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.

We support the ongoing introduction of legislation

around the world to provide greater protection to workers against the threat of modern slavery. **Ooni's Modern Slavery Statement** has been published in accordance with Section 54 of the UK Modern Slavery Act 2015. It explains the progress we have made in taking steps towards identifying and preventing modern slavery and human trafficking within our business and supply chains for the financial year ending 31 December 2020 and describes our 2021 commitments for tackling modern slavery.

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 2020.

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 83 people globally,

including one colleague in China. We use four third-party operated warehouses located in the UK, Netherlands and the US. We also have an outsourced customer service operation in the Philippines (employing seven workers) and Thailand (employing one worker).

Ooni Limited is a privately owned company, and its shareholders are Kristian Tapaninaho, Darina Garland, Simon Fry and Kevin Quinn. Ooni, Inc. (USA) and Ooni GmbH (Germany) are 100% owned subsidiaries of Ooni Limited.

Structure, business and supply chains

Our products

Ooni is a leading designer, manufacturer and retailer of pizza ovens. We also sell accessories and groceries (dough balls and pizza ingredients). Our products are designed and engineered by our team in Scotland and manufactured via contract manufacturing partners in factories predominantly located in China. These are then shipped to warehouses in the Netherlands, the UK and the US. We serve individual customers in the EU, UK and US through our own e-commerce website **ooni.com**, and we sell via online marketplaces such as Amazon. We also have a network of retail and distribution partners around the world, who retail our products.

Production suppliers

We have 29 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 occur. Our Tier 1 suppliers are predominantly located in China, but also in Germany, Lithuania, Slovenia, the UK, Ukraine and the US. The map on P4 provides further information on the number of suppliers located in each country and the products they supply.

We have long standing relationships with many of our Tier 1 suppliers and only our subscription food box suppliers change seasonally.

Tier 2 suppliers provide the raw materials, components and services used in the manufacture of our products, such as stainless and carbon steel, aluminium and gas componentry. We do not have a direct relationship with any Tier 2 suppliers; they are contracted

via our Tier 1 suppliers. We are in the process of mapping these Tier 2 suppliers and plan to complete this work by September 2021.

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.

Logistics and operational suppliers

We also use logistics and operational suppliers who provide the following different types of services: shipping, transport, warehousing, couriers, waste management, professional services and office cleaning. We will map these suppliers in 2021 and will look to include them in our modern slavery prevention programme in 2022.

Our supply chain



Tier 1 suppliers



Tier 1 sourcing countries



Tier 2 suppliers mapped

2021 Modern Slavery Prevention Commitments



Map and risk assess Tier 2 suppliers



Map and risk assess logistics and operational suppliers



Implement a supplier database, start to collect relevant supplier ethical information

Operations and supplier map



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	1 employee

Tier 1 Suppliers

China	17 suppliers	Ovens, accessories
UK	5 suppliers	Dough balls, firestarters, dough trays, subscription boxes, wood pellets (via Russia)
Germany	1 supplier	Dough trays
Lithuania	1 supplier	Solid firewood
Ukraine	1 supplier	Charcoal
Slovenia	1 supplier	Cookbook
USA	3 suppliers	Wood pellets, cookbooks

Policies

Governance

The Chief Operating Officer (COO) is responsible for overseeing Ooni's approach to human rights, ethical trade and modern slavery prevention. The COO meets with the Ooni Limited Executive Team quarterly to discuss sustainability related issues, including human rights risks and to review any significant supplier non-compliances, or more frequently as required.

On a day-to-day basis, our Impact 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, they will meet with the COO quarterly to review business and supplier performance against these policies and discuss any emerging human rights issues.

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*

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.

We are also in the process of producing a Diversity, Equity and Inclusion Policy and an Impact Policy which references the ten UN Global Compact Principles, and includes a section on Social and Ethical Impact, encompassing modern slavery, ethical trade and human and labour rights.

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



Policies

Supply chain policies

We recognise we need to develop a more robust ethical trade programme. During this reporting period, we have been building human rights expertise and understanding of our supply base within the business to help us to do this. We have focused our efforts on mapping our supply chain and risk assessing Tier 1 suppliers through collating and reviewing existing third-party audits. Over the coming year, we will work with external experts to

help us progress our modern slavery prevention approach. Our next step is to develop a Supplier Code of Conduct and roll this out to all manufacturing Tier 1 and 2 suppliers and warehouses.

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 mapping our Tier 1 Chinese supply base, we can confirm we do not source from factories in XUAR. Over the coming year, we will conduct further due diligence to verify there are no Uyghurs working under forced labour conditions in our Chinese factories.

2021 Modern Slavery Prevention Commitments



Create a Supplier Code of Conduct, translate into relevant languages and roll out to all suppliers and warehouses



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



Develop a formalised child labour and remediation policy and roll out to all suppliers and warehouses



Conduct due diligence on our Chinese suppliers to ensure Uyghurs are not working under forced labour conditions



Establish a review process for human rights risks and supplier performance across all relevant teams

Due diligence

We want to build relationships with suppliers that reflect our values and show a genuine commitment to providing safe, fair and respectful working conditions for all workers.

Our supply base is predominantly located in China where we have 17 Tier 1 suppliers, so this is where we focused our initial due diligence efforts.

New suppliers

During the early stages of building our ethical trade programme, we have been selecting Chinese manufacturing partners based on their capabilities, previous products manufactured and past audit history. Prior to COVID-19, our Chief Executive Officer, Product Team, Senior Operations Manager and Chief Operating Officer would visit suppliers up to two times a year and discuss social audit history and labour conditions.

In 2021, we will develop a more thorough and formal supplier onboarding process which will include a requirement to comply with our Code of Conduct as part of the supplier contractual agreement. We will also require new suppliers to provide us with an audit carried out in the last two years.

Existing suppliers

We are now in the process of developing a more comprehensive ethical trade programme that will initially encompass all our Tier 1 production suppliers and selective Tier 2 suppliers based on risk. These suppliers will be required to supply Ooni with a SMETA audit undertaken in the last two years. Any Tier 1 and 2 suppliers whom we identify as high risk, following a review of the audit findings, will also be required to undergo an additional audit annually against Ooni's own Code of Conduct.

Grievance mechanisms

We have a Whistleblowing Policy in place for our employees. It provides a safe channel of communication for employees to identify and report any potential concerns to appropriate managers or one of our Whistleblowing Officers. We encourage anyone within the business to raise human rights concerns through these channels.

We investigate all reports fairly and confidentially, where possible and providing 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 genuine concern.

2021 Modern Slavery Prevention Commitments



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



Develop ethical trade programme processes and procedures



Develop a more formal new supplier on boarding process

Risk assessment

We are currently in the process of formalising our risk assessment approach. Our initial investigations have determined that our highest risk modern slavery risks lie within our production supply chain. We have mapped our Tier 1 suppliers and risk assess them, primarily based on location. Our Head of China Manufacturing is in regular direct contact with suppliers and implements our programme on the ground.

While we believe the risk of modern slavery is low within our direct business operations as all of Ooni's employees are employed directly by us and are on permanent contracts, our outsourced customer service team and the agency workers at our third party warehouses, 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 2022.

Over the coming year, we will also expand our supply chain risk assessments to cover specific modern slavery indicators, raw materials, product and service type, worker type, including vulnerable worker groups and the likelihood of involvement of recruitment or labour agencies.

Modern Slavery Risks

HIGH

Product supply chain, including raw materials, outsourced customer service workers


MEDIUM

Logistics and operational suppliers, workers recruited through agencies at our warehouses

LOW

Ooni employees recruited directly


2021 Modern Slavery Prevention Commitments

 **Formalise supply chain modern slavery risk assessment process and map where vulnerable workers may be at risk**

Training and capacity building

We plan to develop and roll out specific modern slavery training to key employees, the Senior Leadership Team and the Board in 2021.

2021 Modern Slavery Prevention Commitments

 **Develop modern slavery training with external experts and train key employees, the Senior Leadership Team and the Board**

Effectiveness of our approach

Through our risk assessment process and following reviews of supplier audits, we have not found any incidents of potential modern slavery indicators within our business and supply chains. We have also not

received any grievances related to modern slavery and labour rights through our grievance mechanisms. However, we recognise that we are in the early stages of developing our modern slavery prevention

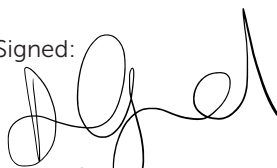
approach and will continue to build knowledge internally, with input from external experts, to give us the best possible chance of identifying and preventing modern slavery within our sphere of influence.

2021 Modern Slavery Prevention Commitments Summary

Supply chain mapping	<ul style="list-style-type: none"> Map and risk assess Tier 2 and logistics and operational suppliers
Database	<ul style="list-style-type: none"> Implement a supplier database to capture relevant supplier ethical information
Policies	<ul style="list-style-type: none"> Create a Supplier Code of Conduct, translate into relevant languages, roll out to all suppliers and warehouses Develop a Child Labour and Remediation Policy and roll out to all suppliers and warehouses
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
Governance	<ul style="list-style-type: none"> Establish a review processes for human rights risks and supplier performance across all relevant teams
Due Diligence and Risk Assessment	<ul style="list-style-type: none"> Develop ethical trade programme processes and procedures Develop a more formal new supplier onboarding process Formalise supply chain modern slavery risk assessment process and map where vulnerable workers may be at risk 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 Conduct due diligence on our Chinese suppliers to ensure Uyghurs are not working under forced labour conditions
Training	<ul style="list-style-type: none"> Develop modern slavery training and train key employees

This statement was approved by Ooni Limited Board of Directors on 12 May 2021.

Signed:



Darina Garland
Co Chief Executive Officer
12 May 2021



**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](https://www.ooni.com/impact)

