

# SharkNinja Modern Slavery / Transparency in Supply Chains Act Statement for Fiscal Year 2024

## Introduction

This statement is made pursuant to section 54(1) of the United Kingdom (UK) Modern Slavery Act 2015 for SharkNinja Europe Ltd and the California Transparency in Supply Chains Act for SharkNinja Midco LLC (collectively “SharkNinja”). This statement is for the period from 1 January 2024 to 31 December 2024 unless indicated otherwise.

## About SharkNinja

SharkNinja is a global product design and technology company that creates innovative 5-star rated lifestyle solutions for consumers around the world. We have built two billion-dollar brands that drive strong growth and innovation across 36 sub-categories. We have a proven track record of entering and establishing leadership positions by disrupting the market across household product categories, including Cleaning, Cooking and Beverage, Food Preparation, and Beauty and Home Environment.

SharkNinja employs approximately 3,600 team members in 28 offices around the world as of 31 December 2024.

## Our Supply Chain

Our finished products are manufactured by original equipment manufacturers (OEMs) in China and Southeast Asia - including Vietnam, Malaysia, Thailand, Indonesia and Cambodia. Our suppliers are often responsible for the sourcing of components used to manufacture our products, but in certain instances, we directly source these components from sub-suppliers and pay for and own certain tooling and equipment used by our suppliers in assembly.

## Purpose, Values, and Commitment

At SharkNinja, our mission is to positively impact people’s lives, every day, in every home around the world. We seek to ensure the safety, wellbeing, and human rights of those in our supply chain. We expect our business operations, our people and every company with which we work to conduct business ethically and legally, and we are committed to respecting and promoting human rights in the production of Shark and Ninja products. We have zero tolerance for slavery and human trafficking. Our expectations are detailed in our [Supplier Ethics Policy and Supplier Code of Conduct](#) and require ethical business practices and respect for the human rights of all workers in our supply chains.

Since our previous statement, we adopted a Responsible Minerals Sourcing Policy covering battery materials and conflict minerals pursuant to EU Regulation 2023/1542 and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. This policy details our due diligence approach for ensuring responsible sourcing of covered materials and minerals.

## **Verification and Certification of Product Supply Chains**

We seek only to deal with reputable OEMs that share our values and principles with respect to human rights, including our zero-tolerance policy as to human trafficking and slavery. As part of the contracting process, all OEMs must read and acknowledge our Supplier Code of Conduct, which strictly prohibits the use of human trafficking and slavery. OEMs also must communicate these requirements to their suppliers of component parts and materials and monitor their compliance with our Supplier Code of Conduct.

## **Internal Accountability**

Governance of social compliance within our value chain is overseen by our social compliance team, which is responsible for audit oversight and compliance with the Supplier Code of Conduct and other relevant policies. The team reports progress and any issues to our global compliance team.

When associates join SharkNinja, they are required to complete trainings on our [Code of Business Conduct and Ethics](#) and Conflicts of Interest Policy, as well as regular anti-harassment training. Our Code of Business Conduct and Ethics details our commitment to ensuring that all contractors and those in our supply chain reflect our values, including zero tolerance for slavery and human trafficking. It also encourages associates to report any suspected misconduct to leadership or through our ethics and compliance hotline, a comprehensive and confidential reporting tool.

To ensure ethics remains top of mind, in 2024, we instituted mandatory annual Code of Business Conduct and Ethics training for all associates and launched targeted anti-bribery and conflicts of interest training for managers and above, as well as for all associates in departments that have frequent interactions with external stakeholders, such as People & Culture, Legal and Finance.

In 2024, we took steps to enhance hotline utility and awareness. We increased the number of languages available on the hotline as well as the number of dedicated phone lines for multiple countries. Further, we developed materials to boost hotline awareness with associates and required that these materials be posted in all our OEMs around the world.

## **Supplier Training and Capacity Building**

When onboarding new OEMs, we deliver social compliance awareness training, which sets our expectations for social compliance and must be completed prior to beginning production of our products. Where deficiencies exist, we support OEMs in developing compliant policies and programs.

We proactively engage with OEMs on issues of social compliance. In September 2024, we held a SharkNinja social compliance summit for our global OEMs to reinforce awareness of and ensure compliance with our Supplier Code of Conduct requirements. We held a similar summit in April 2024 with our Southeast Asia OEMs. OEMs were asked to confirm alignment of their social compliance policies and programs with our requirements, provide greater visibility into their factory social compliance management systems and cascade our Supplier Code of Conduct to their component suppliers. Content was prepared by our SVP of Global Quality, VP of Global Compliance and VP of

Internal Audit. This reinforces our commitment that 100% of our OEMs (our direct manufacturing partners) receive training on modern slavery risks and requirements.

## **Auditing**

Our reputation and our consumers' willingness to purchase our products depend in part on the compliance of our suppliers to operate with ethical employment practices, such as those related to child labor, wages and benefits, forced labor, discrimination and safe and healthy working conditions. Failure to comply with applicable laws, regulations and standards could harm our reputation and brand image or expose our company to litigation, regulatory proceedings or other liabilities.

To mitigate this risk, we leverage a combination of internal and third-party audits (including unannounced audits) to monitor social compliance of our OEMs. We regularly conduct internal social compliance audits, which include assessing key modern slavery risks that may arise from manufacturing, including employment status, pay, working hours, age, benefits and workplace safety. During the audits, randomly selected workers are interviewed to assess their voluntary employment, employment freedom and to ensure they hold identification documentation, along with other legal requirements.

In 2024, we continued to partner with a third-party consulting firm to conduct unannounced social compliance audits at designated suppliers, totaling approximately 25% of our OEM base. These audits found high compliance with our standards and no zero-tolerance findings, reinforcing that current programs are being well executed.

We continue to require each OEM facility to be annually audited by a third-party using the Sedex Members Ethical Trade Audit (SMETA) protocol. OEM enrollment in Sedex will continue in 2025. Using Sedex, we can review performance across our supplier base to identify strengths and gaps in vendor performance.

Based upon findings from the internal and external audit reports, we may require a Corrective Action Plan (CAP) with a timeline for implementing necessary changes. Depending on the severity of the non-compliance, sanctions can include business reductions, suspensions, financial penalties and termination. We track OEMs' efforts to resolve non-compliances to ensure that corrective actions are taken within specified timeframes.

In alignment with our Responsible Minerals Sourcing Policy, we established and operate a due diligence process to identify upstream actors in the supply chain, assess risk and track mitigation progress. This includes participation in the Responsible Business Association's Responsible Minerals Initiative to advance responsible sourcing practices.

## UK Modern Slavery Act Signature

In accordance with the UK Modern Slavery Act, this 2024 Modern Slavery Statement was approved by the directors of SharkNinja Europe Ltd.

SharkNinja Europe Ltd is the European Headquarters for the retail of Shark and Ninja household appliances both online and in stores. SharkNinja Europe Ltd is registered in England and Wales with company number 08492819, located at *1st/2nd Floor Building 3150, Thorpe Park, Century Way, Leeds, England, LS15 8ZB*.

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David Butwell  
Director, SharkNinja Europe Ltd  
Chief Operating Officer, EMEA

For and on behalf of SharkNinja Europe Limited  
Dated: #### 2025

Approved by the Board of Directors on ####

This is our 8<sup>th</sup> statement in response to UK's Modern Slavery Act.