

# **SharkNinja Modern Slavery Act / Transparency in Supply Chains Act / Fighting Against Forced Labour and Child Labour in Supply Chains Act Statement for Fiscal Year 2025**

## **Introduction**

This statement is made pursuant to section 54(1) of the United Kingdom (UK) Modern Slavery Act for SharkNinja Europe Ltd., the California Transparency in Supply Chains Act for SharkNinja Midco LLC, and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act for SharkNinja Global SPV, Ltd. (collectively “SharkNinja”). This statement is for the period from January 1, 2025 to December 31, 2025, unless indicated otherwise.

## **About SharkNinja**

SharkNinja is a global product design and technology company, with a diversified portfolio of 5-star rated lifestyle solutions that positively impact people’s lives in homes around the world. Powered by two trusted, global brands, Shark and Ninja, the company has a proven track record of bringing disruptive innovation to market. Developing one consumer product after another has allowed SharkNinja to enter multiple product categories, driving significant growth and market share gains.

SharkNinja employs approximately 4,100 team members in 31 offices around the world as of December 31, 2025.

## **Purpose, Values, and Commitment**

At SharkNinja, our mission is to positively impact people’s lives, every day, in every home around the world. We are committed to ensuring 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, human trafficking, forced labor and child labor. Our expectations are detailed in our [Global Supplier Code of Conduct](#) and require ethical business practices and respect for the human rights of all workers in our supply chains.

We’ve also adopted a Responsible Minerals Sourcing Policy covering battery materials and conflict minerals pursuant to EU Regulation 2023/1542 and Section 1502 of the US 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.

## **Our Supply Chain**

Our finished products are manufactured by original equipment manufacturers (OEMs) in China and Southeast Asia, including Cambodia, Indonesia, Malaysia, Thailand, and Vietnam. 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.

### **Supply Chain Risk Assessment**

SharkNinja has identified risks to the best of our knowledge and will continue to strive to identify emerging risks in our activities and supply chains. We are aware that there may be higher risks of child labor and forced labor associated with certain regions, goods and industries. We use the findings of our internal and third-party audits, alongside our Sedex/SMETA program, to prioritize our due diligence efforts in the highest-risk areas of our supply chain.

### **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 team members 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. It also encourages team members 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 2025, we continued to administer mandatory annual Code of Business Conduct and Ethics training for all team members and launched targeted anti-bribery and conflicts of interest training for managers and above, as well as for all team members in departments that have frequent interactions with external stakeholders, such as People & Culture, Legal and Finance.

In 2025, we continued to take steps to enhance hotline utility and awareness. We have increased the number of languages available on the hotline, as well as the number of dedicated phone lines for multiple countries. Further, we maintain a program to promote hotline awareness among team members, and require the posting of hotline materials at all OEM facilities globally.

### **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. As part of the contracting process, all OEMs must read and acknowledge our Supplier Code of Conduct. OEMs also must communicate these requirements to their suppliers of component parts and materials and monitor their compliance with our Supplier Code of Conduct.

### **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. We expanded our supplier summit program in 2025, conducting two global summits for which attendance was mandatory for all OEMs. Held virtually in April and October, our 2025 supplier summits focused on SharkNinja's Supplier Code of Conduct requirements, including how to report suspicious ethics findings and the importance of social compliance for SharkNinja's suppliers and supply chain.

Our quality team reviewed audit requirements at the 2025 supplier summits, including ensuring OEM policies align with our Code of Conduct; displaying our Ethics reporting hotline awareness posters visibly within factory premises; and communicating all updates to relevant factory personnel. Internal audit findings and recommended remedies were also presented, along with laws and legal requirements related to the legal use of labor agents in Southeast Asia. We also reiterated our practice of interviewing and reviewing documented responses from migrant labor during audits. This reinforces our commitment to ensure that 100% of our OEMs 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 and employment freedom and to ensure they hold identification documentation, along with other legal requirements.

In 2025, we continued to partner with a third-party auditing firm to conduct unannounced social compliance audits at designated suppliers. These types of audits demonstrate SharkNinja's seriousness with regard to social compliance and incentivize OEMs to maintain compliance between formal audits. Unannounced audits drive sustained supplier vigilance while also generating findings for SharkNinja from unannounced inspections. In 2025, 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 continued in 2025 as our OEM base expanded. Using Sedex, we can review performance across our supplier base to identify strengths and gaps in vendor performance.

## **Corrective Actions and Remediation Measures**

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 the event that slavery, human trafficking, forced labor or child labor were identified in our supply chain, SharkNinja is committed to taking remediation steps that prioritize the wellbeing of affected workers and their families, including addressing any loss of income resulting from remediation actions. Should such instances be identified, SharkNinja would work with relevant stakeholders — including suppliers, local partners and where appropriate, civil society organizations — to develop remediation approaches that avoid causing further harm or hardship to vulnerable individuals and families. Per our due diligence process, we have not identified any instances that require remediation and vulnerable families have not experienced loss of income as a result of steps we have taken to eliminate these risks in our supply chain.

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.

**Assessing Effectiveness**

SharkNinja assesses the effectiveness of our efforts to prevent and reduce the risk of slavery, human trafficking, forced labor and child labor through an annual review of key performance indicators drawn from our audit program. Key indicators used to evaluate program effectiveness include those featured below, which reflect the breadth of our audit coverage across our OEM partners and the rate at which our OEMs are actively remediating non-compliances. We use these results to identify gaps in audit coverage and inform continuous improvement efforts.

	<b>2025</b>
OEMs who have received a SEDEX-aligned audit (calendar year)	95%
OEMs who have received a SEDEX-aligned audit in past ~18 months	100%
OEMs who engaged in corrective actions (calendar year)	100%

## **UK Modern Slavery Act Signature**

In accordance with the UK Modern Slavery Act, this 2025 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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/s/ David Butwell

David Butwell

Director, SharkNinja Europe Ltd.

For and on behalf of SharkNinja Europe Limited

Dated: May 28, 2026

Approved by the Board of Directors on May 29, 2026

This is our 9<sup>th</sup> statement in response to UK's Modern Slavery Act.

## **Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act — Attestation**

This report has been approved by the governing body of SharkNinja Global SPV, Ltd.

In accordance with the requirements of the Act and, in particular Section 11 thereof, I, in the capacity of Director, attest that I have reviewed the information contained in the report on behalf of the governing body of SharkNinja Global SPV, Ltd. Based on my knowledge and having exercised reasonable diligence, I 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.

I have the authority to bind SharkNinja Global SPV, Ltd.

/s/ Adam Quigley

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Adam Quigley  
Director  
SharkNinja Global SPV, Ltd.  
Dated: May 28, 2026