



TRAEGER, INC. STATEMENT ON FORCED LABOR, HUMAN TRAFFICKING, AND MODERN SLAVERY

I. INTRODUCTION

The below statement is provided to outline the approach of Traeger, Inc. and its subsidiaries (together referred to herein as, “Traeger” or the “Company”) to addressing risks of forced labor, child labor, human trafficking, and other forms of modern slavery, including to meet mandated disclosure requirements for the UK Modern Slavery Act, the Canada Fighting Against Forced Labor and Child Labor in Supply Chains Act (“S 211”), and the California Transparency in Supply Chains Act for 2026, to the extent applicable to any such entities.

II. OUR BUSINESS AND SUPPLY CHAIN

Traeger, Inc. is a Delaware corporation and the parent company of Traeger Pellet Grills LLC and Apption Labs. Traeger, Inc. offers a range of grills, wood pellets, cooking sauces, rubs, shakes, and accessories through its Traeger brand, and connected cooking technology through its MEATER brand. The company is headquartered in Salt Lake City, Utah, USA, and operates globally with subsidiaries in Canada, the United Kingdom, Germany, and Denmark.

Most contract manufacturing occurs in Asia, notably China and Vietnam. Traeger employs approximately 450 people across its headquarters and wood pellet production facilities in the United States, supported by international teams through its subsidiaries.

III. GOVERNANCE AND POLICIES

Traeger’s Nominating and Corporate Governance Committee reviews and evaluates Traeger’s policies, programs, and strategies related to corporate responsibility including environmental stewardship, responsible investment, corporate citizenship, human rights, human capital management, and other social and public matters of significance to the company.

Various members of management have roles in implementing and acting on Traeger’s corporate responsibility strategy, including our responsible sourcing program. For example, our Sourcing, Operations, and Compliance teams work collaboratively to conduct supplier due diligence, manage compliance audits, and implement corrective actions.

Traeger has various policies to promote corporate responsibility, including in the supply chain. For example, we maintain a vendor & supplier code of conduct that outlines our expectations of our supply chain partners.

SUPPLIER CODE OF CONDUCT

Each supplier is required to adhere to Traeger's Vendor & Supplier Code of Conduct, which includes the following provision:

Suppliers shall not use forced, bonded, indentured or prison labor for any parts of production of Traeger products. Suppliers shall not traffic in persons or employ the use of slave labor, bonded labor, indentured labor, or involuntary convict labor. This includes the transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation. Workers shall not be required to hand over passports or identification documents or pay recruitment-related fees.

Suppliers are contractually required to acknowledge this code and to represent that they are in compliance with the code and applicable local laws, including regarding wage and benefits, working hours, and other aspects of labor conditions. Moreover, supplier compliance with Traeger's Supplier Code of Conduct is monitored through various verification efforts, as described further in Section IV below.

IV. RISK ASSESSMENT

Traeger is most exposed to forced labor and human trafficking risks through our contract manufacturers, located primarily in China and Vietnam. Both countries are considered high-risk for forced labor according to NGOs around the world and the United States government. We expect to continue sourcing from both countries for the foreseeable future and will manage the risks through its Responsible Sourcing Program, detailed below.

Traeger monitors its supply chain risks continuously to identify current global events and geopolitical developments that could impact our risk exposure. Some of the peripheral issues Traeger monitors regularly include:

- The use of labor brokers in our supplier-base.
- Our factories' subcontracting practices.
- Ways to obtain better visibility of our lower-tier suppliers.

To manage the above risks, Traeger maintains an internal standard operating procedure that covers pre-sourcing due diligence, auditing and monitoring, and remediation processes. We require suppliers in which we have direct relationships to communicate our compliance expectations to their suppliers.

PRE-SOURCING SCREENING

Prior to signing manufacturing services agreements with potential production partners, Traeger conducts extensive due diligence to ensure that suppliers:

- Are not included on any sanctions or watchlist.

- Have a history of safe working conditions that comply with local laws.
- Are not the subject of any pending investigations related to forced labor, worker abuse, or otherwise.
- Meet Traeger minimum standards of care related to responsible business practices, forced labor, or otherwise.

To confirm that potential production partners meet the above requirements, Traeger uses third-party proprietary tools to verify sanction, watchlist, PEP exposures, as well as a qualitative review of supplier management systems, previous audits, and grievance management at the facility.

AUDITING

As part of Traeger’s Responsible Sourcing Program, the Company implements a risk-based audit program that considers the factory’s risk profile to determine the need for an audit or an alternative performance verification. We use independent third-party audit management firms to conduct audits.

Traeger requires social compliance audits for production suppliers using internationally recognized standards, including:

- **AMFORI-BSCI** (Business Social Compliance Initiative), which assesses 13 areas including "No Bonded, Forced Labour or Human Trafficking" as a specific criterion.
- **ETI-SEDEX** (Ethical Trade Initiative), which evaluates whether “employment is freely chosen” and “responsible recruitment and entitlement to work.”

These frameworks leverage the Ethical Trading Initiative Base Code and ILO conventions, including coverage of forced labor indicators such as :

- Recruitment fee payments.
- Document retention by employers.
- Freedom of movement restrictions.
- Voluntary employment verification.
- Working hours and overtime coercion.
- Subcontractor and labor agency oversight.

Audits may be announced, semi-announced, or unannounced; these are generally completed on an annual basis, and we also allow suppliers to present existing audit results from third-parties (e.g. SEDEX) to potentially waive the requirement in a given audit period.

REMEDIATION

Traeger requires its suppliers to correct social compliance issues, including those that may arise during pre-sourcing due diligence and audits. Zero-tolerance issues require immediate remediation followed by an audit to confirm the issues are resolved and workers are protected. This would include instances of forced and child labor, though we have not identified any such instances with our suppliers. All non-zero tolerance issues require a Corrective Action Plan and regular progress reviews to ensure remediation. We

emphasize an approach of continual improvement, but suppliers unable to satisfactorily correct identified issues are expected to be phased out of our supply chain.

V. TRAINING AND AWARENESS

INTERNAL TRAINING

All key internal functional units are trained in management obligations related to the prevention of forced labor and human trafficking. Business units that receive training include Human Resources, Sourcing, Operations, Compliance and Sales. Internal trainings are performed in-person and virtually. Traeger employees are trained how to use the company grievance channel to report issues related to labor abuse.

SUPPLIER TRAINING

Traeger conducts annual supplier trainings that cover our Supplier Code of Conduct compliance expectations, including forced labor and human trafficking, freedom of association and anti-bribery. The trainings are performed both in-person and virtually and focus on high-risk regions and challenges. Supplier management is trained on Traeger's compliance requirements and ways that they can improve their management capacity to prevent forced labor in their operations.

VI. GRIEVANCE AND REPORTING MECHANISMS

To promote effective access to remedy for our supply chain workers, Traeger requires all suppliers to maintain an anonymous grievance mechanism for workers to report violations and/or concerns related to management practices.


As a secondary control in case factory management is unresponsive to worker reports, Traeger provides a supply chain specific grievance mechanism for workers to report violations and/or concerns directly to Traeger. Workers employed directly by Traeger are provided a direct reporting channel managed by the Human Resources and Legal departments.

VII. MEASURING EFFECTIVENESS AND IMPROVEMENT

Traeger's Responsible Sourcing Program was launched in 2021. We evaluate program effectiveness through systematic review of audit results, supplier performance metrics, and continuous improvement initiatives. Under Traeger's scoring system, critical violations trigger immediate corrective action requirements, up to and including potential supplier termination. This system of continued review is an ongoing tool to monitor the effectiveness of programs in addressing the risks of modern slavery. We also review our corporate responsibility policies and processes from time-to-time to assess alignment with evolving standards regarding such risks.

APPROVAL

On March 2, 2026, this statement was approved by the Board of Traeger, Inc. in their capacity as principal governing body of Traeger, Inc.

By:  _____

Jeremy Andrus

Chief Executive Officer