



Traeger, Inc.'s Statement on Forced Labor, Human Trafficking and Modern Slavery

1 Introduction

This statement on Forced Labor, Human Trafficking and Modern Slavery is provided to meet mandated disclosure requirements for the UK Modern Slavery Act and the California Transparency in Supply Chains Act and relates to actions and activities during the financial year January 1, 2023 to December 31, 2023.

The Modern Slavery Act (2015): The Law requires entities conducting business in the UK with revenues exceeding £36 million to disclose details regarding their management efforts to prevent forced labor and human trafficking in their supply chains.

The California Transparency in Supply Chains Act (2010): The Law requires manufacturers and retailers doing business in California with revenues exceeding US\$ 100,000,000 to disclose their management efforts to prevent human trafficking in their supply chains.

1. Company Background

Traeger, Inc. ("the Company") offers a range of grills, pellets, cooking sauces, rubs, and accessories. The Company was founded in 1985 and is headquartered in Salt Lake City, Utah USA. Traeger employs approximately 640 employees across its US and international offices and its wood pellet production facilities.

2. Operations and Supply Chain

Traeger's business operations include sales, marketing, research, product development, supply chain and logistics. Traeger also owns wood pellet production facilities located throughout the United States. The Company also has subsidiaries located in Canada, the United Kingdom, Denmark and Germany through which it conducts sales and marketing operations, and uses distribution channels and agreements to sell goods across additional markets, including certain EU countries and Australia, and maintains a production management presence in China.

Traeger sources supplies world-wide through various supply chains including product and materials sourcing, packaging, distribution, procurement of equipment, as well as other goods and services. Traeger's production facilities are located across the United States and its contract manufacturing is spread out across the world. Most contract manufacturing occurs in Asia, notably China and Vietnam.

3. Our Risks

Traeger recognizes that it has a responsibility to take a robust approach to forced labor and human trafficking. 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 continue to source from both countries and will likely do so for the foreseeable future and shall manage the ongoing risks through our 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; and
- Ways to obtain better visibility of our lower tier suppliers.

To manage the above risks, Traeger depends upon our Responsible Sourcing Program policies, pre-sourcing due diligence, and compliance auditing and remediation activities. We require our direct suppliers to communicate our compliance expectations to their sub-suppliers. While no issues related to modern slavery or human rights have been identified in our supply chain, we remain vigilant.

3. Our Policies

Traeger understands that supplier compliance with our expectations requires both supplier facing and internal facing policies. The following policies address the multi-faceted approach and reflects our commitment to acting ethically and with integrity in all our business relationships, implementing and enforcing effective systems and controls to ensure forced labor and human trafficking are not taking place in our supply chains.

Supplier Code of Conduct

Traeger communicates its compliance requirements to suppliers through its Supplier Code of Conduct. As stated in our Supplier Code of Conduct, Traeger expects its suppliers to adhere to the following provision.

Suppliers will not use forced, bonded, indentured or prison labor for any parts of production of Traeger products. Suppliers will 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 will not be required to hand over passports or identification documents or pay recruitment-related fees.

Supplier compliance with Traeger's Supplier Code of Conduct is monitored through annual on-site audits and inspections that cover factory management practices including recruitment fees, treatment of migrant workers, business relationships with labor brokers, and factory staff training.

Responsible Sourcing Policy

Traeger reinforces its supplier compliance expectations through our internal Responsible Sourcing Policy. As part of the Policy, our Sourcing and Operations teams are expected to:

- Integrate Traeger's ESG Principles into all sourcing decisions, including selection and retention;

- Communicate with suppliers around planning, forecasting and lead times to prevent production capacity issues that incentivize supplier subcontracting and excessive working hours; and
- Train all management on Traeger's Responsible Sourcing Program policies and procedures.

4. Due Diligence and Verification

Traeger maintains an internal standard operating procedure that covers pre-sourcing due diligence, auditing and monitoring, and remediation processes.

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; and
- 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 alternative performance verification tool. We use a third-party audit management firm to conduct quality control checks on all audits performed, which provides us with extra assurance of the audit's impartiality and provides an additional method to ensure impartiality throughout the audit process.

Remediation

Traeger requires its suppliers to correct compliance issues identified in audits, including those identified during pre-sourcing due diligence. All zero-tolerance issues identified through an initial audit require immediate remediation followed by a follow-up audit to confirm the issues are resolved and workers are protected. All non-zero tolerance issues require a Corrective Action Plan and progress reviews at 45 and 90 days to ensure that compliance issues are remediated.

5. Training

To ensure a high level of understanding of the risks of forced labor and human trafficking in our supply chains and our business, Traeger adopts internal and supplier training activities.

Internal Training

All key internal functional units are trained on Traeger's obligations relating to the prevention of forced labor and human trafficking. Business departments that receive training include Human Resources, Sourcing, Operations, Compliance and Sales. Internal trainings are performed in-person and virtually and include information on how to use Traeger's 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 force labor and human trafficking, freedom of association and anti-bribery. These 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.

6. Grievance Channels

Traeger requires all of its suppliers to maintain an anonymous grievance mechanism for workers to report violations and/or concerns related to management practices.

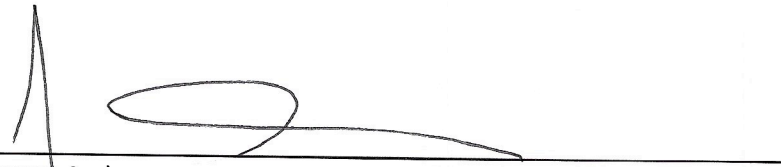
As a secondary control in case factory management is unresponsive to worker reports, Traeger provides a supply chain specific grievance mechanism for workers to report violations and/or concerns directly to Traeger. Workers employed directly by Traeger can report grievances through a direct reporting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

7. Effectiveness of Supply Chain Due Diligence

Traeger's Responsible Sourcing Program was launched in 2021. The Company has implemented several KPIs to monitor the effectiveness of our Responsible Sourcing Program efforts.

Effectiveness metrics include the following:

- Audit scores (tier 1 and tier 2);
- Most common compliance issues identified in audits; and
- Audit scores (year on year).



Jeremy Andrus
President & CEO
Traeger, Inc.

[Signature as required by the UK Modern Slavery Act]

Traeger Contact Information

If you have any questions about the contents of this statement, or Traeger's Responsible Sourcing Program, please contact esg@traeger.com