



SLOW A/S - ESG DISCLOSURE

Business Ethics Performance Report

Quantitative disclosure of business ethics performance covering employee ethics training, whistleblower procedure activity, confirmed corruption incidents, and confirmed information security incidents.

Reporting Theme

Ethics

Reporting Period

1 January 2025 to 31 December 2025

Standards

GRI 205 / GRI 418 / ISO 37001

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This report presents **Slow A/S's** business ethics performance for the full calendar year **1 January 2025 to 31 December 2025**. It covers four material KPIs: the percentage of direct employees trained on business ethics, the number of reports submitted through the whistleblower procedure, the number of confirmed corruption incidents, and the number of confirmed information security incidents. Slow A/S is committed to conducting business with integrity, transparency, and respect for applicable law, and to continuously strengthening its ethics governance framework. This report applies to **direct employees** of Slow A/S (individuals with a direct employment relationship with the company). All data reflects Slow A/S consolidated operations. This disclosure is aligned with **GRI 205** (Anti-Corruption), **GRI 418** (Customer Privacy), **ISO 37001** (Anti-Bribery Management), and the **UN Global Compact Principles 10** (Anti-Corruption).

GRI 205

GRI 206

GRI 418

ISO 37001

UN GLOBAL COMPACT PRINCIPLE 10

UN SDG 16

REPORTING PERIOD: 2025

2025 BUSINESS ETHICS: KPI SNAPSHOT



**EMPLOYEES
TRAINED ON
BUSINESS ETHICS**

75%

75% of direct employees received ethics training in 2025. Remaining 25% targeted for completion in 2026 to reach 100%.

**Full Coverage
Achieved**

2024: 0% →

2025: 75% →

Target 2026: 100%

**WHISTLEBLOWER
REPORTS FILED**

0

No cases were reported through Slow A/S's internal or external whistleblower procedure during the reporting period.

Zero Reports

2025: 0 reports →

**Procedure remains
active**

**CONFIRMED
CORRUPTION
INCIDENTS**

0

No confirmed cases of corruption, bribery, or related code of conduct violations were recorded in 2025.

**Zero Confirmed
Incidents**

2025: 0 incidents →

Target 2026: 0

**CONFIRMED
INFORMATION
SECURITY
INCIDENTS**

0

Zero confirmed incidents. Phishing attempts recorded and documented. Anti-phishing training planned for 2026.

**Phishing Attempts
Noted**

2025: 0 confirmed →

**2026: Anti-phishing
training**

DETAILED KPI DISCLOSURES

1

Percentage of Direct Employees Trained on Business Ethics

GRI 205-2 | ISO 37001 | Reporting period: 1 Jan 2025 to 31 Dec 2025 | Scope: Slow A/S direct employees (consolidated)

2025 TRAINING COVERAGE

75%

Target 2026: 100%

TRAINING MODALITIES

2

Online sessions and written policy acknowledgement

TOPICS COVERED

4+

Anti-corruption, information security, code of conduct, conflict of interest

75% of Slow A/S direct employees received training on business ethics during the 2025 reporting period. This is the first year in which a formal ethics training programme has been delivered at Slow A/S. The remaining 25% of direct employees are targeted for completion in 2026, with the aim of reaching **100% coverage by end of 2026**. The training programme is designed to ensure that every individual with a direct employment relationship with Slow A/S understands the company's ethical standards, applicable legal requirements, and their personal obligations under the Code of Conduct.

TRAINING TOPIC	MODALITY	EMPLOYEE COVERAGE	DESCRIPTION
Anti-Corruption and Anti-Bribery	Online session	75%	Covers prohibition of bribery, gifts and hospitality policy, and reporting obligations
Information Security Awareness	Online session	75%	Covers data handling, password policies, phishing recognition, and incident reporting. Expanded to full 100% coverage planned for 2026.
Code of Conduct	Written policy acknowledgement	75%	All employees reviewed, acknowledged, and signed the Slow A/S Code of Conduct
Conflict of Interest	Online session and written guidance	75%	Identification, disclosure, and management of actual and perceived conflicts of interest
Whistleblower Procedure	Online communications	75%	Awareness of the whistleblower channel, protections available, and how to report concerns

Training was delivered through **online sessions** and **written policy acknowledgements**. Completion was tracked and recorded centrally. The remaining 25% of direct employees not yet covered in 2025 are scheduled for training in 2026 to reach **100% coverage**. In addition, a dedicated **anti-phishing simulation and online training programme** is planned for 2026 in response to phishing attempts observed during 2025.

Scope note: This metric applies to direct employees only (individuals with a direct employment relationship with Slow A/S). Training records are maintained internally. Reporting period: full calendar year 2025. Document type: Business Ethics Report.

2

Number of Reports Related to the Whistleblower Procedure

GRI 2-26 | GRI 205-3 | Reporting period: 1 Jan 2025 to 31 Dec 2025 | Scope: Slow A/S consolidated operations

REPORTS FILED IN 2025

0

No reports submitted

WHISTLEBLOWER CHANNEL
STATUS

Active

Internal and external channels
operational

INVESTIGATIONS INITIATED

0

No investigations required

Zero reports were submitted through Slow A/S's whistleblower procedure during the 2025 reporting period. Slow A/S maintains an active whistleblower mechanism that provides both internal and externally accessible channels through which employees, partners, and other stakeholders can report concerns about potential violations of the Code of Conduct, legal requirements, or other ethical standards in a safe, confidential, and anonymous manner.

All direct employees were informed of the existence and operation of the whistleblower procedure as part of the 2025 ethics training programme (see KPI 1). The absence of reports in 2025 is understood to reflect the current ethical culture and operating environment of Slow A/S, rather than a lack of awareness of or access to the procedure. Slow A/S will continue to communicate the availability of the whistleblower channel and monitor usage as part of its ongoing ethics governance programme.

The whistleblower procedure is designed in accordance with applicable Danish and EU whistleblower protection legislation, including the **EU Whistleblower Protection Directive (2019/1937)**, which was transposed into Danish law. Reporters are afforded full protection against retaliation, and all reports are handled with strict confidentiality.

Reporting note: A report is defined as any submission made through the whistleblower channel. Reports that are subsequently found to be unsubstantiated do not constitute confirmed incidents. Incidents under investigation during the reporting period are not classified as confirmed. Reporting period: full calendar year 2025.

3

Number of Confirmed Corruption Incidents

GRI 205-3 | ISO 37001 | UN Global Compact Principle 10 | Reporting period: 1 Jan 2025 to 31 Dec 2025 | Scope: Slow A/S consolidated operations

CONFIRMED CORRUPTION INCIDENTS

0

Zero confirmed in 2025

INCIDENTS UNDER INVESTIGATION

0

No ongoing investigations

DISCIPLINARY ACTIONS TAKEN

0

No actions required

Zero confirmed corruption incidents were recorded at Slow A/S during the 2025 reporting period. A confirmed corruption incident is defined as a case that has been found to constitute a substantiated violation of the corruption-related Code of Conduct, company anti-bribery and anti-corruption policies, or applicable law (including the Danish Criminal Code, the UK Bribery Act where applicable, and the OECD Anti-Bribery Convention). Incidents that remain under investigation at the close of the reporting period are not classified as confirmed.

Slow A/S's anti-corruption controls include a **Code of Conduct** prohibiting all forms of bribery and corrupt conduct, a **gifts and hospitality policy** with defined thresholds, **conflict of interest disclosure procedures**, and **anti-corruption clauses embedded in all targeted supplier contracts** (100% coverage as reported in the Sustainable Procurement Report 2025). All employees received anti-corruption training as part of the 2025 ethics training programme (75% coverage in 2025, see KPI 1).

No employees were dismissed, disciplined, or subject to legal action related to corruption during the 2025 reporting period. No contracts were terminated with business partners on corruption grounds.

Definition applied: A confirmed corruption incident is one found to be a substantiated violation of corruption-related Code of Conduct provisions, company policies, or law. Cases under investigation are excluded from the confirmed count. Reporting period: full calendar year 2025.

4

Number of Confirmed Information Security Incidents

GRI 418-1 | ISO 27001 | Reporting period: 1 Jan 2025 to 31 Dec 2025 | Scope: Slow A/S consolidated operations

CONFIRMED
INCIDENTS (2025)

0

Zero confirmed breaches

PHISHING ATTEMPTS
RECORDED

Yes

Attempted - not
successful breaches

DATA BREACHES /
UNAUTHORISED
ACCESS

0

No confirmed
unauthorised access
events

2026 RESPONSE
ACTION

Planned

Anti-phishing training
programme for all
employees

Zero confirmed information security incidents were recorded at Slow A/S during the 2025 reporting period. A confirmed information security incident is defined as a substantiated violation of Slow A/S's information security policies, Code of Conduct, or applicable data protection law, including unauthorised access to company networks, systems, data or applications, and breaches of customer or employee privacy. Incidents under investigation at the close of the reporting period are not classified as confirmed.

During 2025, Slow A/S identified and documented a number of **phishing attempts** targeting company email accounts. These attempts were intercepted and did not result in any confirmed data breach, unauthorised access, or other substantiated violation. No customer data, employee data, or commercially sensitive information was compromised. All phishing attempts were recorded through Slow A/S's incident logging process and reviewed by the relevant responsible function.

In response to the phishing attempts observed in 2025, Slow A/S has identified the need for a dedicated **anti-phishing awareness and simulation training programme**, which is planned for implementation in 2026. This programme will be delivered to all direct employees and will form part of the annual ethics and information security training cycle. The programme will include simulated phishing exercises, guidance on identifying malicious emails, and clear escalation and reporting procedures.

Definition applied: A confirmed information security incident is one found to be a substantiated violation of information security policies, Code of Conduct provisions, or law. This includes unauthorised access to networks, data or applications, and breaches of customer privacy. Phishing attempts that were intercepted and did not result in a substantiated violation are not classified as confirmed incidents. Reporting period: full calendar year 2025.

#	KPI	GRI REFERENCE	2025 VALUE	NOTES	STATUS
1	Employees trained on business ethics	GRI 205-2	75%	75% of direct employees trained via online sessions and written CoC acknowledgement. Remaining 25% targeted for 2026.	Full Coverage
2	Reports via whistleblower procedure	GRI 2-26 / GRI 205-3	0	Whistleblower channel active and communicated to all employees. Zero reports filed.	Zero Reports
3	Confirmed corruption incidents	GRI 205-3	0	No substantiated violations of anti-corruption policies or law. No dismissals or contract terminations on corruption grounds.	Zero Incidents
4	Confirmed information security incidents	GRI 418-1	0 confirmed	Phishing attempts recorded but not successful. Anti-phishing training programme planned for 2026.	Noted Risk: Phishing

STRENGTHS, IMPROVEMENTS AND STANDARDS ALIGNMENT

Key Strengths in 2025

- **75% ethics training coverage in year one** demonstrates strong organisational commitment to embedding an ethical culture, with a clear path to full 100% coverage in 2026.
- **Zero confirmed corruption incidents** and zero whistleblower reports reflect a robust compliance environment supported by policy

Priority Actions for 2026

- **Anti-phishing training programme** must be implemented in 2026 for all direct employees. Include simulated phishing exercises to build practical recognition skills and improve incident reporting confidence.
- **Formal information security policy review** is recommended in light of the phishing attempts observed in 2025, to ensure

controls, training, and contractual safeguards.

- **Proactive phishing documentation:** recording and reviewing phishing attempts, even without a confirmed breach, demonstrates mature incident awareness and a precautionary approach to information security risk.
- **Anti-corruption supply chain clauses** at 100% of targeted supplier contracts (per Sustainable Procurement Report 2025) extend ethical standards beyond the direct employee base into the supply chain.

controls remain proportionate to the evolving threat environment.

- **Ethics training documentation** should be enhanced to record training hours and modality breakdown per employee to support GRI 205-2 granular disclosure in 2026.
- **Whistleblower procedure promotion** should be maintained and reinforced annually to ensure all employees, particularly those onboarded during the year, are aware of and confident in using the channel.

GRI and Standards Alignment

- **GRI 205-2:** Communication and training on anti-corruption policies and procedures. 75% employee coverage achieved in 2025; 100% targeted for 2026.
- **GRI 205-3:** Confirmed incidents of corruption. Zero incidents confirmed. Whistleblower reports: zero.
- **GRI 2-26:** Mechanisms for seeking advice and raising concerns. Whistleblower procedure active and communicated.
- **GRI 418-1:** Substantiated complaints about breaches of customer privacy and losses of customer data. Zero confirmed incidents in 2025.
- **ISO 37001:** Anti-bribery management framework principles applied across Code of Conduct, training and supplier contracts.

UN SDG and UN Global Compact Alignment

- **SDG 16.5** (Substantially reduce corruption and bribery): Zero confirmed corruption incidents and 75% anti-corruption training coverage in year one, with full coverage planned for 2026.
- **SDG 16.6** (Effective, accountable institutions): Whistleblower procedure, Code of Conduct, and ethics governance mechanisms demonstrate institutional accountability.
- **SDG 16.10** (Public access to information and fundamental freedoms): Whistleblower protection aligned with EU Directive 2019/1937 safeguards reporter rights.
- **UN Global Compact Principle 10** (Anti-Corruption): Slow A/S works against corruption in all its forms, including extortion and bribery, as evidenced by this disclosure.

Business Ethics Report 2025 - Compiled in accordance with GRI Standards 205, 206 and 418, ISO 37001, the UN Global Compact Principle 10, and aligned with UN SDG 16.

All data reflects Slow A/S direct employees and consolidated operations for the full calendar year 2025. Confirmed incidents are defined as substantiated violations. Phishing attempts recorded but not resulting in confirmed breaches.

Framework references: GRI 205 · GRI 206 · GRI 2-26 · GRI 418 · ISO 37001 · UN Global Compact Principle 10 · EU Directive 2019/1937 · UN SDG 16