

# SLOW

*Regenerative Cocoa & Coffee*

## Anti-Bribery and Corruption Policy

*Slow's zero-tolerance commitment to preventing and detecting bribery, corruption, and related misconduct*

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|-------------------------|---|
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| Document Title          | Anti-Bribery and Corruption Policy  |
| <b>Document Type</b>    | Topic Policy (Tier 3)   |
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| Next Review Date        | 2029  |
| <b>Owner</b>            | Chief Impact Officer (CIO)  |
| Approver                | Chief Executive Officer (CEO)   |
| <b>Geographic Scope</b> | All Slow employees, contractors, directors, agents, and business partners globally, and all operations across all countries                             |
| Standards Alignment     | UN Global Compact Principle 10, UK Bribery Act 2010, US Foreign Corrupt Practices Act (FCPA), ISO 37001, OECD Anti-Bribery Convention, EcoVadis, B Corp |

### 1. Policy Statement

Slow operates a zero-tolerance approach to bribery and corruption. Slow does not engage in, condone, or facilitate bribery or corrupt conduct in any form, regardless of the country in which it operates or the business outcome at stake.

This Policy operationalises GOV-POL-01 Business Ethics and Integrity Policy on the specific topic of bribery and corruption. It applies to all Slow employees, directors, contractors, agents, and business partners. It is supported by annual training and a confidential reporting channel.

### 2. Scope

This Policy applies to:

- All Slow employees, directors, officers, contractors, and interns, in all jurisdictions.
- All agents, intermediaries, joint-venture partners, and third parties acting on Slow's behalf.
- All suppliers where Slow's relationship creates a meaningful risk of bribery in the supply chain.

This Policy covers both the private sector and interactions with public officials, including customs, environmental, and labour inspectors in all countries of operation.

### 3. Definitions

### **3.1 Bribery**

Bribery is offering, promising, giving, accepting, or soliciting a financial or other advantage -- directly or through a third party -- with the intention of inducing a person to perform a function improperly, or to reward them for having done so. This includes both the active (giving) and passive (receiving) sides.

### **3.2 Corruption**

Corruption is the abuse of entrusted power for private gain. It encompasses bribery, fraud, embezzlement, nepotism, and related misconduct.

### **3.3 Facilitation Payments**

Facilitation payments are unofficial payments made to government officials to secure or speed up routine government actions (for example, customs clearance or permits). Slow's position is that facilitation payments must be avoided in every case possible. Where an employee faces a demand that they believe creates a genuine risk to their personal safety or to material business continuity, the situation must be escalated to the CEO immediately. The CEO will assess each such case individually; no payment may be made on the basis that escalation is pending. Where, in the rarest of circumstances, a payment has been made, it must be recorded in full and reported to the CEO within 24 hours. Slow will actively seek to eliminate the conditions that give rise to such demands through process changes, escalation to relevant authorities, and engagement with counterparts where it is safe to do so.

### **3.4 Public Official**

Any person holding a legislative, executive, administrative, or judicial position, whether elected or appointed, including customs officers, port officials, environmental inspectors, labour inspectors, and employees of state-owned enterprises.

## **4. Prohibited Conduct**

The following are prohibited without exception:

- Offering, paying, promising, or authorising any bribe or corrupt payment, whether in cash, gifts, entertainment, or any other form of value.
- Requesting, accepting, or agreeing to accept any bribe or corrupt payment.
- Making facilitation payments. Where an employee believes a demand creates a genuine risk to personal safety or material business continuity, the situation must be escalated to the CEO immediately. Any payment made must be recorded and reported to the CEO within 24 hours.
- Using a third party, agent, or intermediary to make a payment that Slow itself could not make directly.
- Establishing or maintaining off-book accounts or funds for the purpose of bribery.
- Falsifying records to conceal payments or advantages given or received.
- Retaliating or threatening to retaliate against any person who refuses to pay a bribe or who reports a suspected violation.

## **5. Gifts and Hospitality**

### **5.1 Permitted Limits**

Gifts and hospitality that are modest, transparent, and genuinely promotional or relationship-building in nature are permitted within the following limits:

- Gifts: maximum value of USD 100 per person per occasion. Gifts must never be in cash or cash equivalents (gift cards, vouchers). Gifts to public officials require prior CIO approval regardless of value.

- Hospitality (meals, events): reasonable and proportionate to the business relationship, and not to exceed USD 200 per person per event. Hospitality above this limit requires prior CIO approval and must be recorded.
- Gifts and hospitality must never be offered with the intent to influence a business decision.

## 5.2 What to Do When a Bribe Is Solicited

If an employee is solicited for a bribe by a government official or any other party, they must: decline politely; not make the payment; record the incident as soon as is safely possible; and report it to the CIO or via the whistleblower channel (GOV-POL-05) within 48 hours. No employee will face adverse consequences for refusing to pay a bribe, even if refusal results in a business cost or delay.

## 6. Third Parties and Agents

Third parties acting on Slow's behalf carry a heightened bribery risk, particularly in higher-risk jurisdictions. Before engaging any agent, intermediary, or lobbyist, the relevant manager must:

- Conduct due diligence on the third party's reputation and conduct, using a risk-proportionate approach.
- Ensure the engagement is documented in a written contract incorporating anti-bribery provisions.
- Confirm that the third party's fee is proportionate to legitimate services rendered.
- Monitor the relationship on an ongoing basis.

Slow does not engage with agents who have a known or credible history of bribery or corruption. Where concerns arise during an existing engagement, the relationship is reviewed immediately and suspended or terminated if warranted.

## 7. Due Diligence on Suppliers

Supplier due diligence includes assessment of corruption risk in the supplier's country of operation and sector. High-risk suppliers are asked to complete anti-corruption declarations and may be audited. The Implementation Manager maintains anti-corruption due diligence records within the supplier file (SUP-FRM-02).

## 8. Training

All staff receive annual anti-bribery training per MGT-06, covering the content of this Policy, scenarios relevant to their role, and how to report concerns. Country Implementation Leads receive enhanced training for high-risk-country contexts. Suppliers are made aware of this Policy via SUP-POL-02 Supplier Code of Conduct and relevant training where applicable.

## 9. Reporting Concerns

Employees and third parties who suspect or witness bribery or corruption must report immediately via:

- Direct report to the CIO or HR Manager.
- The whistleblower channel described in GOV-POL-05 and GOV-SOP-01, which allows anonymous reporting.

All reports are handled confidentially. Retaliation against a person who makes a good-faith report is itself a serious breach of this Policy and will be investigated and acted upon.

## 10. Governance

The CIO owns this Policy. Suspected violations are investigated by the HR Manager (or by the CEO where the HR Manager or CIO is implicated). The CEO is notified of all material suspected violations. The Board is briefed on any confirmed violation in the Annual Impact Review.

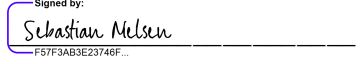
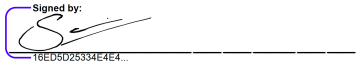
## 11. Non-Compliance

Bribery and corruption are Critical non-conformances under FWK-01 Section 6.4. Confirmed violations result in disciplinary action up to and including termination, and may result in referral to law enforcement. Business partners who commit bribery or corruption are subject to immediate contract termination.

## 12. Revision History

| Version | Date | Author               | Description of Changes  |
|---------|------|----------------------|---|
| 1.0     | 2026 | Chief Impact Officer | Initial release as Tier 3 Topic Policy. Operationalises GOV-POL-01 on anti-bribery and corruption. Covers definitions, prohibited conduct, gifts and hospitality limits, third-party due diligence, training, and reporting requirements. |

## Sign-Off

| Role                    | Name              | Signature & Date   |
|-------------------------|-------------------|--|
| Chief Executive Officer | Sebastian Nielsen | Signed by:<br><br><small>F57F3AB3E23746F...</small><br>Date: <u>5/31/2026</u>    |
| Chief Impact Officer    | Sabrina Mustopo   | Signed by:<br><br><small>18ED50255334E4E4...</small><br>Date: <u>5/29/2026</u> |