

SLOW

Regenerative Cocoa & Coffee

Occupational Health and Safety Policy

Slow's policy commitment to safe and healthy working conditions across all operating contexts

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Document Title	Occupational Health and Safety Policy
Document Type	Topic Policy (Tier 3)
Tier	Tier 3: Topic Policies
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Effective Date	2026
Review Cycle	Annual (more frequent than other Tier 3 policies given the pace of regulatory change and the need to incorporate lessons learned from incidents)
Next Review Date	2027
Owner	Global Certifications and Compliance Manager
Approver	Chief Impact Officer (CIO)
Geographic Scope	Slow Group worldwide: HQ in Singapore; regional offices in Denmark, Finland, and Germany; origin country offices in Indonesia, Laos, Vietnam, Ethiopia, and Kenya; processing facilities in Indonesia (Karakoa), Laos, and Kenya (ACR), and third-party processing in Germany; regenerative agroforestry coffee farms in Laos; smallholder sourcing in Indonesia, Laos, Vietnam, Ethiopia, and Kenya
Standards Alignment	ILO Convention C155 (Occupational Safety and Health), ILO Recommendation R164, ILO-OSH 2001 Guidelines, ISO 45001:2018 (reference standard), GRI 403, SMETA, EcoVadis, Rainforest Alliance, Fairtrade
Companion Document	This Policy is presented together with OHS-MAN-01 Occupational Health and Safety Manual. For audit, certification, and customer assurance purposes, the Policy alone does not constitute a complete OH&S management system and must be presented alongside the Manual

1. Policy Statement

Slow is committed to providing safe and healthy working conditions for every person who works for or with us. Our operations span an office, processing, farm, sourcing, field, and logistics footprint across Singapore, Europe, Southeast Asia, and East Africa. Whatever the setting, Slow's commitment is the same: we do not accept that work should harm health, and we work to prevent harm at source.

Through this Policy, Slow makes the following binding commitments to its workers and to the workers in its supply chain:

- We comply with all applicable occupational health and safety law in every country in which we operate, and we apply the more protective standard where Slow's standards and local law differ.
- We apply the hierarchy of controls (eliminate, substitute, engineer, administer, PPE as last resort) to every identified hazard.
- We provide PPE, training, medical surveillance where required, and emergency facilities at no cost to workers.
- We uphold every worker's right to remove themselves from work that they reasonably believe presents an imminent and serious danger to life or health, and we protect them from retaliation for doing so.
- We consult workers and their representatives on matters affecting their health and safety, including through joint OSH Committees at sites of 20 or more workers.
- We report and investigate all incidents and near-misses, learn from them, and share lessons across the Group.
- We extend these standards to our suppliers and smallholder partners through the Supplier Code of Conduct (SUP-POL-02).
- We continuously improve our OH&S performance against measurable targets, reported transparently.

This Policy is approved by the Chief Impact Officer and signed by Slow's Chief Executive Officer. A copy is physically posted at each Slow site in a location accessible to all workers, in languages appropriate to the workforce. Workers, contractors, and visitors are expected to act in accordance with this Policy at all times.

Detailed operational requirements that operationalise this Policy sit in OHS-MAN-01 Occupational Health and Safety Manual, OHS-SOP-01 Incident Reporting and Investigation SOP, OHS-SOP-02 Emergency Response and Fire Safety SOP, and the corresponding Tier 5 records. For complete operational requirements, this Policy must be read together with OHS-MAN-01.

2. Scope

This Policy applies to all Slow employees, directors, officers, contractors, and interns globally (permanent, fixed-term, seasonal, and casual), to all Slow-owned or leased premises and operations, to workers on supplier and smallholder farms supplying Slow, and to third-party service providers, logistics partners, and visitors at Slow sites.

This document applies across Slow's full operational footprint, covering the following operating contexts:

- Headquarters in Singapore.
- Regional offices in Denmark, Finland, and Germany.
- Origin country offices in Indonesia, Laos, Vietnam, Ethiopia, and Kenya.
- Slow-owned processing facilities in Indonesia (Kraakoa cocoa processing), Laos (coffee processing), and Kenya (African Coffee Roasters, ACR coffee roastery).
- Third-party processing facilities used by Slow in Germany.
- Slow-owned regenerative agroforestry coffee farms in Laos (Nampod, Phuoluang, Lakhao, and Kongtoun).
- Smallholder coffee and cocoa sourcing operations in Indonesia, Laos, Vietnam, Ethiopia, and Kenya.
- Field activities and travel between sites, including movement by road vehicle, motorcycle, and boat, including in remote terrain.
- Logistics activities, including the transport of green coffee, green cocoa, and processed products from origin through processing to customers.

3. Guiding Instruments

Slow's OH&S commitments are anchored in:

- ILO Convention C155 (1981), Occupational Safety and Health Convention, including the worker right to remove from imminent and serious danger (Article 13), employer obligations (Article 16), and worker rights and obligations (Article 19).
- ILO Recommendation R164 (1981), practical guidance on hazard management, worker consultation, no-cost OH&S measures (Para. 10), competent persons (Para. 13), and worker participation through joint committees (Para. 12).
- ILO-OSH 2001 Guidelines on Occupational Safety and Health Management Systems.
- ISO 45001:2018, used as the reference framework for Slow's OH&S management system. Slow does not currently pursue ISO 45001 certification but adopts its plan-do-check-act structure.
- GRI 403 (2018), Occupational Health and Safety, including disclosures 403-1 through 403-10.
- Sector standards: Rainforest Alliance, Fairtrade, and SMETA worker protection requirements.
- All applicable national and local OH&S laws in every country in which Slow operates. Where this Policy and local law conflict, the more protective standard applies.

4. Core Commitments

4.1 Prevention First

Slow applies the hierarchy of controls to all identified hazards: eliminate, substitute, engineer out, control administratively, and only as a last or supplementary measure provide personal protective equipment (PPE). Risk assessments precede new activities, equipment, chemicals, or processes, and are reviewed after incidents or material change. Detailed methodology is set out in OHS-MAN-01.

4.2 No Cost to Workers

Per ILO R164 Para. 10, OH&S measures impose no cost on workers. Slow provides PPE, training, medical surveillance where required, and emergency facilities at the Group's expense. This obligation extends to all workers at Slow-owned sites and is cascaded to suppliers through the Supplier Code (SUP-POL-02).

4.3 Worker Right to Remove from Danger

Per ILO C155 Article 13, every worker has the right to remove themselves from a work situation they reasonably believe presents an imminent and serious danger to life or health. Slow:

- Communicates this right at induction and through routine OH&S communications.
- Does not require workers to return to a situation while imminent and serious danger persists.
- Protects workers who exercise this right from any disciplinary action, retaliation, or disadvantage.

4.4 Worker Consultation and Participation

Per ILO C155 Article 19 and R164 Para. 12, Slow consults workers and their representatives on OH&S matters. This is operationalised through:

- Joint OSH Committees at sites with 20 or more workers (see Section 6).
- Worker representatives on incident investigations and risk assessments.
- Anonymous and identified hazard reporting channels.
- OH&S input via the grievance mechanism (GOV-POL-05 and GOV-SOP-01).

4.5 Competence

Persons assigned OH&S-critical roles (first aiders, fire marshals, agrochemical applicators, machinery operators, drivers in safety-critical roles) hold demonstrable competence verified before assignment and refreshed at intervals defined in the Training and Competency Matrix (MGT-06).

4.6 Hazard Categories Across Slow's Operating Contexts

Slow's operations span diverse contexts, each with characteristic hazards. The high-level categories below indicate where Slow's controls focus; detailed Group minimum standards by operational context (farm, processing, office, field and travel) are set out in OHS-MAN-01 Section 5. These are minimum standards. Each site conducts its own risk assessment and applies additional or more stringent controls where local conditions warrant.

- **Farm operations:** agrochemical handling, working at height in shade and timber trees, machinery and hand tools, snake and wildlife exposure, heat and hydration, manual handling.
- **Processing operations:** machinery and equipment safety, noise, dust, cleaning chemical exposure, manual handling, electrical safety, confined-space entry during cleaning, hot surfaces.
- **Office operations:** display-screen and ergonomic risks, fire safety, electrical safety, manual handling for office equipment, psychosocial risks (workload, stress, harassment).

- **Field and travel operations:** vehicle, motorcycle, and boat travel between sites including in remote terrain; lone working; security risks; wildlife and environmental exposure; first-aid access from remote locations.
- **Logistics operations:** manual handling, machinery (forklifts and other handling equipment), traffic management, working with third-party carriers and warehouses.
- **Cross-context risks:** psychosocial risk and mental health, harassment and bullying, fatigue, exposure to traumatic events. Mental health support per Section 4.10.

4.7 Emergency Preparedness

Each site maintains a documented Site Emergency Response Plan covering credible scenarios such as fire, medical emergency, severe weather, security incident, and evacuation. Annual drills are conducted and reviewed. Detailed requirements sit in OHS-SOP-02.

4.8 Incident Reporting and Investigation

All incidents (fatalities, lost-time injuries, medical-treatment cases, near-misses, occupational illness, and dangerous occurrences) are reported and investigated per OHS-SOP-01. Where an OSH Committee is established, the Committee leads investigations for Critical and High severity events; otherwise the Person In Charge or Country Implementation Lead leads. Serious incidents are escalated to the Global Certifications and Compliance Manager and the CIO, and where required to local authorities within statutory timeframes. Findings inform corrective action and learning across the Group.

4.9 Health Surveillance and Medical Examinations

Per GRI 403-3 and applicable law, Slow provides:

- Pre-assignment, periodic, and post-assignment medical examinations for workers in roles with specific occupational health risks.
- Medical examinations during working hours at no cost to the worker.
- Confidential handling of medical records, accessible only to authorised personnel and consistent with GOV-POL-04 Data Protection.
- Aggregate health surveillance trend analysis to identify systemic risks.

4.10 Psychosocial Risk and Mental Health

Slow recognises that mental health, harassment, bullying, isolation, workload, and exposure to traumatic events are occupational health concerns across all operating contexts. Slow:

- Includes psychosocial risks in workplace risk assessments.
- Trains managers to recognise and respond to signs of mental health concerns.
- Provides access to confidential support, including Employee Assistance Programme arrangements where available.
- Coordinates with HR-POL-03 Employee Engagement and Wellbeing Policy and HR-POL-01 on harassment.

4.11 Vulnerable Workers

Specific protections apply to:

- Pregnant and breastfeeding workers: no exposure to agrochemicals or other reproductive hazards, no night work, breastfeeding breaks provided.
- Young workers (15 to 17): no hazardous tasks, no night work, working hours capped per SOC-POL-01 Annex A.3.
- Migrant workers: information and training in their native language; OH&S information not gated by literacy.
- Workers with disabilities: reasonable adjustments to work, equipment, and emergency procedures.

4.12 Smoke-Free, Drug-Free, and Alcohol-Free Workplaces

Slow workplaces are smoke-free and drug-free. The use, possession, or sale of illegal substances on Slow premises is prohibited. The use of alcohol during working hours is prohibited except at sanctioned events with the approval of country leadership. Workers experiencing dependency may approach HR for confidential support and rehabilitation pathways without prejudice.

4.13 No-Cost Promise on Worker Health Programmes

Slow may, at its discretion, run additional voluntary worker health and wellness initiatives such as health awareness campaigns, ergonomic improvements, fitness programmes, and EAP access. Participation is voluntary and confidential, and these programmes never substitute for Slow's mandatory OH&S obligations under this Policy.

5. Key Performance Indicators

OH&S performance is tracked against the KPI framework in MGT-05. Core OH&S KPIs include:

- Lost-time injury rate (LTIFR per 1,000,000 hours worked), year-on-year reduction target.
- Total recordable incident rate (TRIR per 200,000 hours worked), GRI 403-9 disclosure.
- Number of fatalities from work-related injury or ill-health, target zero.
- Near-miss reporting rate as an indicator of a healthy reporting culture.
- Percentage of sites with a current emergency response plan and annual drill completed.
- Percentage of workers in roles with specific occupational health risks with current health surveillance.
- Percentage of OH&S-critical training completed on schedule.
- Average hours of OH&S training per worker per year (SASB-aligned).

The Global Certifications and Compliance Manager owns OH&S KPI data; the Implementation Manager incorporates it into the wider monitoring framework per MGT-05.

6. Governance: Responsibilities

Responsibilities under this Policy are organised in three blocks: Employer, Worker, and OSH Committee. The structure below applies across the OH&S document suite, with operational detail in OHS-MAN-01 Section 3.

Employer responsibilities (Slow as legal employer)

Per ILO C155 Article 16 and applicable national law in each operating country, Slow as the employer is responsible for:

- Providing and maintaining safe systems of work, premises, machinery, equipment, and processes under its control.
- Providing PPE, training, medical surveillance, and emergency facilities at no cost to workers (ILO R164 Para. 10).
- Establishing and maintaining OH&S policies, procedures, and management systems.
- Conducting hazard identification and risk assessment, and applying the hierarchy of controls.
- Investigating incidents and implementing corrective and preventive actions.
- Notifying competent authorities of occupational accidents and diseases as required by law.
- Providing means and time for worker consultation and participation, including OSH Committee functioning where applicable.
- Protecting workers from retaliation when raising OH&S concerns or exercising the right to remove from imminent and serious danger.

Worker responsibilities

Per ILO C155 Article 19, workers are responsible for:

- Complying with OH&S rules, instructions, and Safe Work Procedures.
- Using PPE and safety devices correctly, and not interfering with or misusing them.
- Reporting hazards, near-misses, incidents, and unsafe conditions promptly.
- Cooperating with the employer in carrying out OH&S duties.
- Participating in OH&S training, drills, and consultations.
- Taking reasonable care for their own safety and the safety of others affected by their actions.
- Exercising the right to remove from imminent and serious danger responsibly (ILO C155 Article 13).

OSH Committee responsibilities (where established)

Where a joint worker-management OSH Committee is established, the Committee is responsible for:

- Owning the methodology and thresholds for hazard identification, risk assessment, and incident severity classification.
- Reviewing and ratifying severity classifications made by named roles within time-critical escalation windows, and re-classifying in light of investigation findings.
- Leading or staffing incident investigations for Critical and High severity events.
- Reviewing corrective and preventive action effectiveness and signing off on closure.
- Conducting or overseeing workplace inspections.
- Approving or recommending site-level risk assessments and emergency response plans.
- Communicating OH&S matters to the wider workforce and channelling worker voice into OH&S decisions.

Where no OSH Committee is established at a site or country, the responsibilities above sit with the Person In Charge (PIC) at site level or the Country Implementation Lead at country level, with the named accountable role identified in the relevant SOP. Worker consultation continues through scheduled all-hands sessions, anonymous reporting channels (GOV-FRM-03), and the grievance mechanism (GOV-SOP-01).

Named-role accountabilities

Within Slow's Impact Management System governance (MGT-01), specific named-role accountabilities apply. The Global Certifications and Compliance Manager owns this Policy and is accountable for its implementation across Slow operations. Country Implementation Leads are responsible for site-level OH&S delivery. Country Managers (Operations) are responsible for local legal compliance. The Chief Impact Officer (CIO) is the approver for this Policy and for OHS-MAN-01 and reviews quarterly OH&S KPIs.

Conflict-of-interest separation: incident investigations are not led by the line manager of the affected worker. Serious incidents are investigated under the supervision of the Global Certifications and Compliance Manager with CIO oversight. Grievances about OH&S follow the route in GOV-POL-05 and may be raised anonymously.

7. Implementation

This Policy is operationalised through:

- OHS-MAN-01 Occupational Health and Safety Manual: detailed standards, hazard control procedures organised by operational context, and country annexes.
- OHS-SOP-01 Incident Reporting and Investigation SOP.
- OHS-SOP-02 Emergency Response and Fire Safety SOP.
- ENV-SOP-03 Agrochemical Safety and Integrated Pest Management SOP (for farm operations).
- MGT-06 Training and Competency Matrix.
- SUP-POL-02 Supplier Code of Conduct: cascades OH&S obligations to suppliers.

Evidence records:

- OHS-FRM-01 Incident Register.
- Hazard identification and risk assessment registers (per site).
- Training Log (held by Implementation Manager per MGT-06).
- First aid kit, fire equipment, and PPE inspection logs.
- Fire and emergency drill records.
- Health surveillance records (confidential, held by HR with restricted access).

8. Non-Compliance

Non-compliance with this Policy is classified per the Framework (FWK-01 Section 6.4) as Critical, Major, or Minor. Critical findings include:

- Any work-related fatality.
- Serious injury caused by failure to apply known controls.

- Falsification of incident or audit data.
- Retaliation against a worker exercising the right to remove from danger or reporting an OH&S concern.
- Charging workers for OH&S measures (PPE, training, medical examinations).

Critical findings trigger immediate escalation to the Global Certifications and Compliance Manager, the CIO, and the CEO, with investigation initiated within 48 hours and corrective action prioritised over commercial considerations. Where a supplier is involved, a Corrective Action Plan is agreed within 30 days; termination follows where the supplier is unwilling to remediate, repeatedly reoffends, or has knowingly engaged in or concealed a Critical violation.

9. Review

This Policy is reviewed annually by the Global Certifications and Compliance Manager and submitted to the CIO for approval. The annual cycle (more frequent than the standard three-year cycle applied to other Tier 3 policies under FWK-01) reflects the pace of OH&S regulatory change in Slow's operating countries and the need to incorporate lessons learned from incidents. Interim reviews are also triggered by:

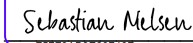
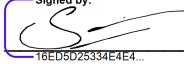
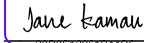
- Material changes in OH&S law in any operating country.
- A fatality or other Critical incident revealing a Policy gap.
- Findings from internal or third-party audit recommending revision.
- Material expansion of operations into new geographies or activities.

10. Revision History

Version	Date	Author	Description of Changes
1.0	2026	Global Certifications and Compliance Manager	Initial release as Tier 3 OH&S Policy. Replaces and consolidates the draft Group OSH Policy (SG-OHS-POL-001) and the OH&S sections of the Sustainability Governance Policy v1.0 (2025). Adapts the draft to Slow's Impact Management System architecture (Global Certifications and Compliance Manager owner; CIO approver), to Slow's full operational footprint (offices, processing, farms, sourcing, field and travel, logistics), and to ILO C155, R164, ILO-OSH 2001, ISO 45001 reference, and GRI 403. Presented together with OHS-MAN-01 for audit and certification purposes.

Sign-Off

This Policy is approved by the Chief Impact Officer and signed by Slow's Chief Executive Officer as top management endorsement. A signed copy is physically posted at each Slow site.

Role	Name	Signature & Date
Chief Executive Officer (top management endorsement)	Sebastian Nielsen	<p>Signed by:  <small>F57F3AB3E23746F...</small></p> <p>Date: <u>5/31/2026</u></p>
Chief Impact Officer (approver)	Sabrina Mustopo	<p>Signed by:  <small>18ED5025334E4...</small></p> <p>Date: <u>5/29/2026</u></p>
Global Certifications and Compliance Manager (owner)	Jane Kamau	<p>Signed by:  <small>28D85A2951B44D5...</small></p> <p>Date: <u>5/29/2026</u></p>