

# SLOW

Regenerative Cocoa & Coffee

## Environmental Policy

Slow's commitments on biodiversity, regenerative agriculture, water, waste, energy, and agrochemicals across Slow operations and smallholder suppliers

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<b>Owner</b>	Head of Nature
<b>Approver</b>	Chief Impact Officer (CIO)
<b>Geographic Scope</b>	All Slow operations (Slow farms, offices, processing facilities) and the smallholder suppliers (direct and upstream supply base) globally
<b>Standards Alignment</b>	Regenerative Organic Certified (ROC) at Gold tier (own farms), EU Organic (EU 2018/848), Smithsonian Bird Friendly, Science Based Targets initiative (SBTi) FLAG, Convention on Biological Diversity, IFC Performance Standards, FAO Code of Conduct on Pesticide Management, WHO Pesticide Hazard Classification, GRI 303/304/305/306, RAG-DOC-01 Slow Regenerative Agriculture Principles (v6.0, approved May 2026)

### 1. Policy Statement

Slow is committed to environmental regeneration across its operations and smallholder suppliers. We go beyond compliance and target continuous improvement in how we manage biodiversity, water, waste, energy, and agrochemicals. Our core production model, regenerative agroforestry, is itself an environmental commitment: it actively restores ecological function rather than merely sustaining it.

Slow's regenerative framework is anchored on a deliberate combination of four internationally recognised standards: Regenerative Organic Certified (ROC), EU Organic, Smithsonian Bird Friendly, and the Science Based Targets initiative (SBTi). On Slow's own farms, the full four-certification stack is the standard. For smallholder suppliers (direct and upstream supply base), a single smallholder standard anchored on EU Organic certification defines what Slow asks every supplier to work toward

with Slow's support. Both frameworks are set out in RAG-DOC-01 Slow Regenerative Agriculture Principles.

This Policy establishes the governing environmental commitments across both production categories, with the exception of climate change and net-zero (ENV-POL-02) and deforestation-free sourcing (ENV-POL-03), which are covered in dedicated policies. This Policy covers biodiversity, regenerative agriculture, water stewardship, waste management, energy, and agrochemical safety.

This Policy uses standardised terminology defined in FWK-01 Appendix A. The key terms used throughout are: Slow operations (Slow farms, offices, and processing facilities, excluding suppliers); Slow farms (farms owned or operated by Slow, currently in Laos and Ethiopia); smallholder suppliers (independent farming households and the cooperatives and traders that aggregate from them, also referred to in supplier-management documents as the direct and upstream supply base); and Slow's sourcing origins (currently Indonesia, Vietnam, Lao PDR, and Ethiopia, with small volumes from other origins including Uganda).

## 2. Scope

This Policy applies to:

- All Slow operations (Slow farms, offices, processing facilities) globally.
- All smallholder suppliers (direct and upstream supply base) providing cocoa, coffee, and related goods and services.
- All service providers, logistics partners, and third parties acting on Slow's behalf.

Direct supply base partners are required to cascade applicable standards to their own sub-suppliers and upstream partners (see SUP-POL-02 Supplier Code of Conduct).

## 3. Guiding Instruments

Slow's environmental commitments are anchored on the four certifications and standards that form Slow's regenerative framework, supplemented by other instruments operationally relevant to the topics covered by this Policy. This list is reviewed at least annually by the Head of Nature.

Primary anchors:

- Regenerative Organic Certified (ROC) — Gold tier on Slow farms.
- EU Organic — Regulation (EU) 2018/848. Applies on Slow farms and is the target certification for smallholder suppliers.
- Smithsonian Bird Friendly — agroforestry pathway.
- Science Based Targets initiative (SBTi) — FLAG (Forest, Land and Agriculture) sector guidance and Corporate Net-Zero Standard.

Supplementary instruments:

- Convention on Biological Diversity (CBD) and the Kunming-Montreal Global Biodiversity Framework.
- IFC Performance Standards on Environmental and Social Sustainability (PS1, PS3, PS6).
- Accountability Framework initiative (AFi).
- FAO Code of Conduct on Pesticide Management and WHO Recommended Classification of Pesticides by Hazard.

- GRI Standards: GRI 304 (Biodiversity), GRI 305 (Emissions), GRI 306 (Waste), GRI 303 (Water).
- RAG-DOC-01 Slow Regenerative Agriculture Principles, which operationalises the four anchors through the Six Pillar Framework and the Managed Transition Protocol.

## 4. Core Commitments

### 4.1 Biodiversity and Ecosystem Integrity

Slow considers biodiversity wherever it operates. Biodiversity is integral to the regenerative outcomes we pursue, the resilience of our farms, and the integrity of the landscapes from which we source. Slow's biodiversity commitments are anchored on Smithsonian Bird Friendly hard criteria for Slow farms and incorporated into the smallholder standard for suppliers. Commitments include:

- On Slow farms: shade cover  $\geq 40\%$  for coffee and  $\geq 30\%$  for cocoa;  $\geq 10$  shade tree species per hectare with  $\geq 60\%$  native trees, dispersed throughout the holding; canopy height  $\geq 12$  metres for the stratum made by the native backbone species; multiple canopy layers (emergent, principal backbone, understory).
- For smallholder suppliers: working toward the same Bird Friendly thresholds with Slow's support (RAG-DOC-01 Section 8.2).
- Protecting High Conservation Value (HCV) and High Carbon Stock (HCS) areas within and adjacent to sourcing landscapes.
- No sourcing from land deforested or converted from natural ecosystems after applicable cutoff dates (see ENV-POL-03 for the full differentiated deforestation cutoff regime).
- Preserving and restoring riparian buffers and forest corridors; using native, non-invasive species in agroforestry system design.
- Considering landscape integrity when making sourcing decisions and when establishing new Slow operations, with the goal of increasing tree cover and improving landscape connectivity.
- Maintaining a biodiversity baseline for Slow farms and tracking indicators annually, including bird species richness (point counts in fruiting season), shade tree species richness, canopy structure, and on-farm natural habitat area (see ENV-SOP-02).
- Participating in landscape-level conservation initiatives where relevant partnerships exist.

The biodiversity strategy and farm-level operationalisation are governed by RAG-DOC-01 Pillar 3 and operationalised in ENV-SOP-02 Biodiversity and Agroforestry SOP.

### 4.2 Regenerative Agriculture

Regenerative agroforestry is Slow's core production model. Slow's regenerative approach is governed by the Slow Regenerative Agriculture Principles (RAG-DOC-01), which set out the four-certification stack for Slow farms (ROC Gold, EU Organic, Bird Friendly, SBTi FLAG), the single smallholder standard anchored on EU Organic certification, the Six Pillar Framework, the Managed Transition Protocol for rehabilitation of severely degraded land, and the carbon accounting approach under the GHG Protocol Land Sector and Removals Standard.

Governing commitments flowing from the Principles include:

- On Slow farms: organic management under EU Organic and ROC Gold, including no synthetic fertilizers, no synthetic pesticides, no GMOs, year-round vegetative cover on 75-100% of cultivated land with at least one nitrogen-fixing cover crop in each full rotation, no-till planting (Gold-tier exemptions documented where applicable), and a minimum seven-crop rotation

interpreted for perennial coffee and cocoa systems as inter-cropped shade species and cover crops within the perennial system.

- For smallholder suppliers: working toward EU Organic certification with Slow's support, no synthetic fertilizers and no synthetic pesticides progressing on an agreed timeframe, documented regenerative soil health practices, and no-burn cultivation. Slow provides agronomic training, planting material, nursery support, and actively pursues funding pathways for certification audit costs (RAG-DOC-01 Section 8).
- Managed Transition Protocol: applies only to the pre-certification rehabilitation of severely degraded land on Slow farms, governed by a five-indicator diagnostic baseline assessment and three rehabilitation categories (A: up to 5 years synthetic permitted; B: up to 2 years; C: no synthetic permitted, immediate organic management). Approval authority rests with the Head of Nature, with Board notification on extension. Plots under active rehabilitation are not represented as ROC or EU Organic certified until they enter Gold-tier organic management.
- Integrated Pest Management as the primary approach to pest and disease control across Slow operations and smallholder suppliers. On certified plots no synthetic pesticides are permitted; biological and cultural controls form the basis of the IPM hierarchy. See Section 4.5 and ENV-SOP-03.
- Farmer training and support: transitioning smallholder suppliers to regenerative practices through training, technical assistance, premium pricing per Slow's Third-Party Supplier Pricing Policy, and active pursuit of funding pathways for certification.

### 4.3 Water Stewardship

Water is a shared resource and a critical input for cocoa and coffee production. Slow's commitments cover both water quantity (consumption) and water quality (pollution prevention), anchored on ROC water conservation requirements and Bird Friendly riparian buffer standards:

- Assessing water risk at material sourcing sites using the WRI Aqueduct tool or equivalent, with site-specific water stewardship plans where water risk is elevated.
- Minimising freshwater withdrawal on Slow farms through efficient irrigation design.
- Coffee and cocoa processing operations operate as closed systems with respect to wastewater. No discharge of untreated processing effluents to natural watercourses; biological treatment of all processing effluent with BOD reduction  $\geq 80\%$  versus untreated at discharge point.
- Agrochemical buffer zones and no-application rules per ENV-SOP-03 (riparian buffers protect waterways from direct chemical application).
- Maintaining riparian buffer zones at minimum widths of  $\geq 5$  metres for streams and  $\geq 10$  metres for rivers, per Bird Friendly recommended practices.
- Monitoring water quality on Slow farms through testing at points of withdrawal and discharge, against WHO Guidelines for Drinking-water Quality and locally relevant parameters. Methodology governed by ENV-SOP-05 Water and Waste Management SOP.
- Tracking water consumption monthly at Slow operations and reporting annually in the Annual Impact Report.

Detailed water management procedures are set out in ENV-SOP-05.

### 4.4 Waste Management

Slow commits to responsible waste management across Slow operations and progressively across smallholder suppliers, anchored on ROC and EU Organic on-farm nutrient cycling requirements:

- Applying a waste hierarchy: reduce first, then reuse, then recycle or compost, then responsible disposal as a last resort.
- 100% composting of organic processing by-products (coffee pulp, husk, processing solids) at Slow operations, returned to the farm as soil amendment (RAG-DOC-01 Pillar 6).
- No open burning of waste at any Slow operations or smallholder supplier site; farmer training programmes specifically address waste burning practices at non-owned farms.
- Safe disposal of hazardous waste, including agrochemical containers, in accordance with local law and WHO guidelines.
- Working toward closed-loop systems for farm residues, including composting and exploring biochar production from coffee cherry by-products, with the dual aim of boosting soil health and creating new sustainable bioeconomy options in Slow's sourcing regions.
- Tracking composted organic by-product volume at Slow operations and selected smallholder farms as a single core waste metric (per ENV-FRM-01) to demonstrate progress against the RAG-DOC-01 Pillar 6 target of 100% organic by-product recycling.
- Working with smallholder suppliers to improve waste management practices, particularly agrochemical container management.

Detailed waste management procedures are set out in ENV-SOP-05.

## 4.5 Agrochemical Safety

Agrochemicals present risks to human health, biodiversity, and water quality. Slow's approach combines the agrochemical-related requirements of EU Organic, ROC, and the smallholder baseline requirements set out in RAG-DOC-01 Section 8.1:

- On Slow farms (under ROC and EU Organic certified production): no synthetic fertilizers and no synthetic pesticides. Integrated Pest Management hierarchy (cultural and biological controls, mechanical interventions, low-risk organic-acceptable inputs as a last resort).
- For smallholder suppliers: baseline non-negotiable prohibition of Highly Hazardous Pesticides as defined by FAO/WHO criteria (including WHO Class 1a/1b acutely toxic actives, GHS carcinogens/mutagens/reproductive toxicants Category 1A/1B, persistent organic pollutants, ozone-depleting substances). The standard smallholders commit to achieve is progression to EU Organic certification on an agreed timeframe, with no synthetic fertilizers and no synthetic pesticides.
- Prohibition of pesticides listed on the Stockholm or Rotterdam Conventions across all Slow operations and smallholder suppliers.
- Provision of appropriate PPE to all workers handling agrochemicals where any agrochemicals are used (in rehabilitation contexts on Slow farms, or pre-certification on smallholder farms); training in local language on safe handling, mixing, application, storage, and disposal.
- No agrochemical application by pregnant or breastfeeding workers, or by workers under 18.
- Proper storage and labelling of all agrochemicals; safe disposal of containers per WHO and local law.

Detailed procedures are set out in ENV-SOP-03 Agrochemical Safety and IPM SOP.

## 4.6 Energy

Slow commits to reducing energy consumption and tracking the share of renewable energy in Slow operations. Slow recognises that renewable energy availability varies significantly across countries of

operation; in some contexts, national grid infrastructure limits the feasibility of renewable energy adoption. Accordingly:

- Slow prioritises energy efficiency in facility design and equipment selection across all operations.
- Where renewable energy is technically and commercially feasible, Slow pursues it. Where it is not, Slow documents the constraint and tracks grid energy consumption with the aim of transitioning as infrastructure improves.
- Slow promotes energy efficiency in on-farm activities, including capturing energy from crop residues (for example biogas or biochar systems) and minimising transport energy for organic fertilizers by using on-farm waste streams. These are long-term goals where current scale and economics may not yet support immediate implementation.
- Slow tracks Scope 1 and Scope 2 energy consumption annually (see ENV-POL-02 and ENV-SOP-01).
- Renewable energy use and sources are recorded in ENV-FRM-02.

## 5. No-Go Commitments

The following practices are prohibited without exception across all Slow operations and smallholder suppliers:

- Sourcing from land deforested or converted after applicable cutoff dates (see ENV-POL-03 for full cutoff regime, including 31 December 2020 EUDR cutoff and 1 January 2015 ROC Gold cutoff for new own-farm acquisitions).
- Use of Highly Hazardous Pesticides as defined by FAO/WHO criteria, including WHO Class 1a/1b acutely toxic actives.
- Use of pesticides listed on the Stockholm or Rotterdam Conventions.
- Open burning of vegetation for land clearing or waste disposal anywhere in Slow operations or smallholder suppliers.
- Discharge of untreated agrochemical waste or processing effluents directly into waterways.
- Sourcing from legally protected areas where legally prohibited.
- Use of synthetic fertilizers or synthetic pesticides on ROC and EU Organic certified plots.
- Use of child labour or forced labour anywhere in Slow operations or smallholder suppliers (a baseline non-negotiable requirement under RAG-DOC-01 Section 8.1).

## 6. Governance

The Head of Nature owns this Policy and is accountable for its implementation across Slow operations and smallholder suppliers. The GIS and Data Specialist supports biodiversity and environmental data collection, monitoring, and geospatial analysis. Country Implementation Leads execute environmental commitments at origin.

The CIO is briefed quarterly on environmental performance, including biodiversity indicators, water risk and quality, waste management progress, and any incidents. This Policy is approved by the CIO. Material changes to the regenerative framework (the four-certification stack, the smallholder standard, the Managed Transition Protocol categories) are decisions reserved for the Board per RAG-DOC-01 Section 10.

## 7. Implementation

This Policy is operationalised through:

- RAG-DOC-01 Slow Regenerative Agriculture Principles: four-certification stack, Six Pillar Framework, Managed Transition Protocol, smallholder standard.
- ENV-SOP-01 GHG Inventory SOP: Scope 1, 2, 3, and FLAG measurement under the GHG Protocol LSR Standard.
- ENV-SOP-02 Biodiversity and Agroforestry SOP: farm-level biodiversity, agroforestry, and Managed Transition Protocol operational procedures.
- ENV-SOP-03 Agrochemical Safety and IPM SOP: safe use and IPM protocols for any agrochemical use (rehabilitation and pre-certification contexts).
- ENV-SOP-04 EUDR Due Diligence SOP: deforestation monitoring and plot verification.
- ENV-SOP-05 Water and Waste Management SOP: water use, water quality, and waste procedures.

Evidence records:

- ENV-FRM-01 Environmental Monitoring Log.
- ENV-FRM-02 Renewable Energy Record.
- ENV-FRM-03 Plot Deforestation Verification Record.
- ENV-FRM-04 GHG Inventory Workbook.

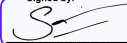
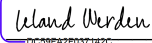
## 8. Non-Compliance

Non-compliance with this Policy is classified per FWK-01 Section 6.4. Use of prohibited pesticides, open burning anywhere in Slow operations or smallholder suppliers, illegal disposal of agrochemical waste or processing effluents, and use of synthetic inputs on ROC and EU Organic certified plots are classified as Critical non-conformances. Other environmental violations are classified Major or Minor depending on severity, scope, and recidivism.

## 9. Revision History

Version	Date	Author	Description of Changes
1.0	2026	Head of Nature	Initial release as Tier 3 Environmental Policy. Decomposes the environmental sections of the Corporate Social Responsibility Policy (v1.2, 2024) and the Environmental and Social Management System into a dedicated topic policy aligned with the Slow Impact Management System architecture. Anchored on the four-certification stack (ROC Gold, EU Organic, Bird Friendly, SBTi FLAG) established in RAG-DOC-01 Slow Regenerative Agriculture Principles. Covers biodiversity, regenerative agriculture (with the smallholder standard for suppliers and the Managed Transition Protocol for rehabilitation contexts), water stewardship, waste management, energy, and agrochemicals. Climate and deforestation-free commitments are addressed in ENV-POL-02 and ENV-POL-03 respectively.

## Sign-Off

Role	Name	Signature & Date
Chief Impact Officer	Sabrina Mustopo	<p>Signed by:  16EDSD28334E4E4...</p> <p>Date: <u>5/29/2026</u></p>
Head of Nature	Leland Werden	<p>Signed by:  DC89FA2F037142C...</p> <p>Date: <u>5/29/2026</u></p>

ENV-POL-01 Environmental Policy | v1.0 | 2026