

SLOW

Regenerative Cocoa & Coffee

Deforestation-Free Supply Chain Policy

Slow's deforestation-free and conversion-free sourcing commitment, the differentiated cutoff regime, and EUDR compliance

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Status	Approved
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Owner	Head of Nature
Approver	Chief Impact Officer (CIO)
Geographic Scope	All cocoa and coffee sourcing globally — Indonesia, Vietnam, Lao PDR, Ethiopia, and other origins (including small volumes from Uganda)
Standards Alignment	EU Deforestation Regulation (EUDR) (EU) 2023/1115, Regenerative Organic Certified (ROC) v4.1 Section 1.4 clean-land-use threshold, Smithsonian Bird Friendly rolling ten-year zero-deforestation requirement, Accountability Framework initiative (AFi), GRI 304, RAG-DOC-01 Slow Regenerative Agriculture Principles

1. Policy Statement

Slow commits to deforestation-free and conversion-free cocoa and coffee sourcing. Slow applies deforestation requirements aligned to the certification scope of each operation, as set out in RAG-DOC-01. The cutoff regime is differentiated by operation type to align with the requirements of each anchor in Slow's four-certification stack while remaining compliant with the EU Deforestation Regulation across the entire supply chain.

Slow maintains full compliance with the EU Deforestation Regulation (EUDR), which requires operators placing cocoa and coffee on the EU market to conduct due diligence, geolocate all production plots, verify deforestation-free status, and submit due diligence statements. Deforestation-free integrity is also foundational to Slow's Bird Friendly and (for new own-farm acquisitions) ROC Gold certifications.

2. Scope

This Policy applies to:

- All cocoa and coffee volumes sourced by Slow, regardless of origin, certification status, or commercial channel.
- All smallholder suppliers (direct supply base partners including traders, cooperatives, and aggregators, and the upstream supply base of smallholder farming households).
- All Slow farms (existing sites and new acquisitions).

Direct supply base partners are required to cascade this commitment to their own upstream suppliers and to provide the data and documentation necessary for Slow to fulfil its EUDR due diligence obligations.

3. Guiding Instruments

- EU Deforestation Regulation (EUDR) — Regulation (EU) 2023/1115, in effect for operators from 30 December 2025.
- Regenerative Organic Certified (ROC) v4.1 Section 1.4: clean land-use threshold of 1 January 2015, applied to new own-farm acquisitions to preserve ROC Gold eligibility.
- Smithsonian Bird Friendly: rolling ten-year zero-deforestation requirement applied to all Bird Friendly certified plots.
- Accountability Framework initiative (AFi) Core Principles on deforestation and conversion.
- GRI 304 (Biodiversity) for disclosure of supply chain deforestation risk.
- RAG-DOC-01 Slow Regenerative Agriculture Principles, which sets out the differentiated cutoff regime.

4. Core Commitments

4.1 Differentiated Deforestation Cutoff Regime

Slow applies deforestation cutoffs aligned to the certification scope of each operation, as formalised in RAG-DOC-01 Section 2.1 (Note on deforestation cutoffs):

Operation type	Cutoff date	Source of requirement
Existing Slow farms	31 December 2020	EUDR Article 2(13)
Smallholder suppliers	31 December 2020	EUDR Article 2(13); baseline non-negotiable requirement under RAG-DOC-01 Section 8.1
New Slow farm acquisitions	1 January 2015	ROC v4.1 Section 1.4 clean land-use threshold (preserves ROC Gold eligibility at the point of acquisition)
Bird Friendly certified plots	Rolling ten years prior to certification	Smithsonian Bird Friendly certification requirement

Any existing Slow farm site with forest conversion between 1 January 2015 and 31 December 2020 remains compliant with EUDR and Bird Friendly but would sit outside ROC scope unless and until reassessed. Verification of land-use history back to 2015 for current Slow farm sites in Indonesia, Vietnam, Lao PDR, and Ethiopia is in progress.

Deforestation means the conversion of forest to agricultural or other land use, whether resulting from human action or not. Conversion means the change of a natural ecosystem with significant biodiversity

or carbon value to an agricultural or other use. Both are prohibited regardless of legal status in the country of origin. The EUDR explicitly classifies agroforestry systems as agricultural plantation excluded from the definition of forest (EUDR Article 2(6)); any future conversion of natural forest to agroforestry plots would therefore constitute deforestation under the EUDR, regardless of canopy cover maintained.

4.2 Plot Geolocation

All production plots in Slow's supply chain are geolocated. Slow's GIS and Data Specialist maintains a plot polygon database in QField, covering:

- All Slow farm plots.
- All smallholder plots supplying Slow across all sourcing origins.
- All plots supplied through cooperatives and traders with whom Slow has a direct commercial relationship.

100% polygon coverage of all supply base plots is a requirement, not a target. Plot data is collected by field staff using QField and validated by the GIS and Data Specialist. Geolocation of plots is a precondition for supplier approval; no new supplier is onboarded without plot coordinates.

4.3 Deforestation Monitoring and Verification

All geolocated plots are monitored for deforestation using publicly available satellite monitoring systems. Slow's primary monitoring stack is Global Forest Watch (DIST-Alerts) and JRC TMF (EU Joint Research Centre Tropical Moist Forest map), supplemented by RADD where applicable and Hansen data as historical reference. The GIS and Data Specialist reviews alerts on at least an annual cadence (with automation as the target). Specific tools may be substituted as the remote sensing landscape evolves.

Verification includes:

- Overlay of plot polygons against deforestation alert layers.
- Cross-checking against EUDR-recognised country risk classifications.
- For new own-farm acquisitions, verification of land-use history back to 1 January 2015 to preserve ROC Gold eligibility.
- Field verification for plots where satellite data is inconclusive, including drone imagery and georeferenced site photos where feasible.

4.4 EUDR Compliance

As an operator placing cocoa and coffee on the EU market, Slow fulfils the full EUDR due diligence obligation:

- Collecting all required information: supplier, country of origin, plot geolocation, and deforestation-free verification.
- Assessing and mitigating risk per the EUDR risk assessment methodology.
- Submitting due diligence statements via EU TRACES before each relevant shipment.
- Maintaining records of all due diligence information for five years.
- Ensuring downstream EU traders can rely on Slow's due diligence where applicable.

The GIS and Data Specialist coordinates EUDR submissions in collaboration with Slow's EU-based importer entity (Slow Denmark). Detailed procedures are set out in ENV-SOP-04 EUDR Due Diligence SOP.

4.5 Supplier Obligations

All direct supply base partners and smallholder suppliers must:

- Accept and comply with SUP-POL-02 Supplier Code of Conduct, which includes this deforestation-free commitment.
- Provide plot-level geolocation data for all plots supplying Slow.
- Provide evidence of deforestation-free status (satellite verification, certification, or field evidence) against the applicable cutoff date in Section 4.1.
- Notify Slow immediately of any new sourcing area or supplier that may affect deforestation-free coverage.
- Allow Slow or its agents to conduct verification activities, including field visits and remote sensing checks.

Non-compliance with this commitment is treated as a Critical non-conformance (see FWK-01 Section 6.4). Supplying deforestation-linked material is grounds for immediate suspension and, absent credible remediation, termination.

4.6 No-Go Areas

Slow will not source cocoa or coffee from:

- Land deforested or converted after the applicable cutoff date set out in Section 4.1.
- Legally protected areas where sourcing is legally prohibited.
- Unverified plots where deforestation status cannot be established.
- Suppliers who refuse to supply geolocation data.

5. Governance

The Head of Nature owns this Policy. The GIS and Data Specialist leads all technical deforestation monitoring, plot database management, and EUDR submission activities. The Implementation Manager coordinates supplier due diligence overlap. Country Implementation Leads support field-level plot data collection.

The CIO is briefed quarterly on deforestation monitoring status and any flagged plots. Confirmed deforestation findings are escalated immediately to the CIO and, where they affect EU shipments, to Slow Denmark.

6. Implementation

This Policy is operationalised through:

- ENV-SOP-04 EUDR Due Diligence SOP — plot geolocation, monitoring, and EUDR submission.


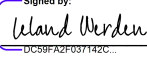
Evidence records:

- ENV-FRM-03 Plot Deforestation Verification Record — per-plot deforestation status and evidence against the applicable cutoff date.
- ENV-FRM-04 GHG Inventory Workbook — land-use data feeding Scope 3 and FLAG calculations.

7. Revision History

Version	Date	Author	Description of Changes
1.0	2026	Head of Nature	Initial release as Tier 3 Deforestation-Free Supply Chain Policy. Decomposes the deforestation-related sections of the Corporate Social Responsibility Policy (v1.2, 2024) and integrates EUDR compliance requirements not previously documented in a dedicated policy. Applies the differentiated cutoff regime set out in RAG-DOC-01 Section 2.1: 31 December 2020 (EUDR) for existing Slow farms and smallholder suppliers; 1 January 2015 (ROC v4.1 Section 1.4) for new own-farm acquisitions; rolling ten years for Bird Friendly certified plots. Primary monitoring stack is Global Forest Watch DIST-Alerts and JRC TMF. Aligned with EUDR (EU) 2023/1115, AFi Core Principles, ROC Gold v4.1, and Smithsonian Bird Friendly.

Sign-Off

Role	Name	Signature & Date
Chief Impact Officer	Sabrina Mustopo	Signed by:  Date: 5/29/2026
Head of Nature	Leland Werden	Signed by:  Date: 5/29/2026

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