

SLOW

Regenerative Cocoa & Coffee

Grievance and Whistleblower Policy

How Slow receives, handles, and resolves concerns from employees, workers, farmers, communities, and third parties

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Tier	Tier 3 — Topic Policies
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Owner	HR Manager
Approver	Chief Impact Officer (CIO)
Geographic Scope	All stakeholder groups globally: employees, workers, farmers, communities, suppliers, and third parties
Standards Alignment	UN Guiding Principles on Business and Human Rights (Principles 29-31), OECD Due Diligence Guidance, IFC Performance Standard 1, EU Whistleblower Protection Directive 2019/1937, B Corp, EcoVadis, SMETA

1. Policy Statement

Slow is committed to maintaining accessible, safe, and effective channels through which any employee, worker, farmer, community member, or third party can raise a concern about Slow's conduct or the conduct of its business partners -- without fear of retaliation.

An effective grievance mechanism is a core component of Slow's human rights due diligence and a requirement under the UN Guiding Principles on Business and Human Rights. This Policy governs the grievance mechanism for all stakeholder groups and the whistleblower channel for employees and business partners who wish to report suspected wrongdoing. The operational procedure is set out in GOV-SOP-01 Grievance Mechanism SOP.

2. Scope and Intended Users

This Policy covers two related but distinct channels:

- The grievance mechanism: available to any person who has a concern about an impact of Slow's operations or supply chain on themselves, their family, or their community. This includes employees, workers on supplier farms or facilities, smallholder farmers, local community members, indigenous peoples, and any other affected person.

- The whistleblower channel: available to Slow employees, contractors, and third parties who wish to report suspected violations of Slow's policies, including bribery, corruption, fraud, human rights violations, falsification of records, or retaliation. Reports may be made anonymously.

These channels are complementary. A single concern may be received and processed through either or both, depending on its nature.

3. Key Principles

3.1 Legitimacy and Accessibility

The grievance mechanism is designed to be accessible to all intended users. This means:

- Channels are available in local languages at all Slow operations and sourcing sites.
- Multiple intake methods exist: in-person, online form, written submission, and community representative.
- No prior knowledge of Slow's internal structures is required to raise a concern.
- The existence and contact details of the channel are communicated at regular community meetings, on-site, in farmer training, and in worker orientation.

3.2 Confidentiality

The identity of a person raising a concern is treated as confidential and is not disclosed without their consent, except where disclosure is required by law or is necessary to protect the person from immediate harm. Anonymous submissions are accepted and investigated to the extent possible.

3.3 Non-Retaliation

Retaliation against any person who raises a concern in good faith -- whether or not the concern is ultimately upheld -- is prohibited and constitutes a serious violation of this Policy. This protection covers the person raising the concern and any person who assists in the investigation. Where retaliation is suspected or confirmed, it is investigated and acted upon independently of the underlying concern.

3.4 Equitable and Rights-Compatible

The mechanism operates in a manner consistent with internationally recognised human rights. Outcomes are proportionate and fair. Affected persons are kept informed of progress. Remediation, where warranted, is designed to address the harm experienced.

3.5 Transparency

Aggregate data on grievances received (number, type, status, average resolution time) is reported annually in the internal Board Impact Briefing (RPT-02). Individual case details are not published externally.

4. Grievance Intake Channels

Slow operates the following intake channels:

- In-person: any employee or field staff member in country; Country Implementation Lead; HR Manager.
- Online form: a dedicated online grievance submission form, accessible via Slow's website and internal channels. The form allows submissions to be made anonymously. The form is checked by the HR Manager on every business day.
- Written: submission via email to a designated address; or a physical form (GOV-FRM-03) deposited in a confidential box at Slow offices or community meeting points.
- Via a trusted representative: a community leader, NGO partner, or farmer cooperative representative may submit on behalf of an affected person.

- Anonymous: an anonymous reporting form (GOV-FRM-03) is available without requirement to provide identifying information. Anonymous submissions are handled with additional care to ensure the anonymity is maintained throughout the process.

Contact details for all channels are kept current and are published in the Annual Impact Report, on Slow's website, and in all supplier and farmer onboarding materials.

5. Process Overview

The detailed procedure is in GOV-SOP-01 Grievance Mechanism SOP. The key steps are:

- Receipt: the concern is received via any intake channel and logged in the Grievance Log (GOV-FRM-02) by the HR Manager within 5 business days.
- Acknowledgement: the person raising the concern (where identifiable) receives written acknowledgement within 5 business days of receipt.
- Assessment: the HR Manager assesses the concern and routes it to the relevant owner. Human rights concerns (including child labour, forced labour, and severe harm) are forwarded to the Social Lead within 24 hours. Ethics and integrity concerns (bribery, fraud) are forwarded to the CIO. Community and land rights concerns are forwarded to the Social Lead.
- Investigation: conducted by the relevant owner, with the HR Manager maintaining oversight and managing communication with the person who raised the concern.
- Resolution: a decision is communicated to the person (where identifiable) within 30 days for non-critical concerns; critical concerns are escalated immediately and resolved as quickly as possible.
- Closure: the case is logged as closed when the outcome has been communicated and any agreed remediation is in progress.
- Closure: the case is logged as closed when the outcome has been communicated and any agreed remediation is in progress. Where a person remains dissatisfied, they are informed of external remediation options, including relevant national authorities, certification body complaints processes, and NGO support.

6. Escalation

Escalation pathways are set out in MGT-01 Section 3. Key escalation requirements:

- Critical concerns (child labour in worst forms, forced labour, severe harm, retaliation, bribery): acknowledged within 48 hours; Social Lead or CIO leads investigation; CIO notifies CEO within 48 hours; Board notified within 72 hours.
- Concerns about the HR Manager: escalated directly to the CEO.
- Concerns about the CEO or Board: handled by the Board Chair, with independent investigation where warranted.
- Concerns involving potential criminal conduct: referred to law enforcement in consultation with legal counsel.

7. Specific Provisions for Workers and Farmers

Workers on farms and in facilities that supply Slow are entitled to use Slow's grievance channel directly. Country Implementation Leads and farmer coordinators ensure that:

- Workers are informed of the channel in their native language during farmer and supplier training.
- The channel is accessible to seasonal and migrant workers, not only permanent employees.
- Workers understand that they may raise concerns without the knowledge of their direct manager or employer.
- Where a worker raises a concern and their employer is the subject of that concern, Slow manages the investigation independently of the supplier's own processes.

8. Community Grievances

Communities near Slow's sourcing sites may raise concerns about environmental impacts, land use, water access, community safety, cultural heritage, or the conduct of Slow or its suppliers. Community grievances follow the same process as individual grievances, with additional steps where the concern relates to indigenous peoples' rights or FPIC. Community engagement around the grievance mechanism is conducted per SOC-SOP-04.

9. Remediation

Where a concern is upheld, Slow's aim is to provide or cooperate in remediation that restores the affected person or community to the position they would have been in had the harm not occurred. Remediation may take the form of cessation of harmful conduct, apology, restitution, compensation, rehabilitation, or guarantees of non-repetition. Remediation is proportionate to the severity of the harm.

For supplier-linked harms, Slow uses its leverage to support remediation by the supplier. Slow's default approach is engagement and support for improvement, not immediate termination, as disengagement may harm the very workers and farmers this mechanism seeks to protect.

10. Governance

The HR Manager owns the intake and case management function for this Policy and the Grievance Log (GOV-FRM-02). The CIO holds overall accountability for the mechanism's effectiveness. The Social Lead leads investigations of human rights impacts arising from grievances. The CIO reviews the grievance log quarterly. Aggregate performance data is reported annually in RPT-01 and, with more detail, in RPT-02.

Conflict-of-interest safeguards: grievance intake sits with the HR Manager, not with Operations or Country Managers. Grievances concerning the HR Manager or senior leadership are escalated to the CEO. The grievance channel is structurally independent of the commercial Sourcing function.


11. Records

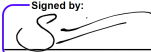
Grievance records are maintained in GOV-FRM-02 (Grievance Log and CAP Tracker), held by the HR Manager. Records are retained for 7 years after case closure per MGT-07. Personal data within grievance records is handled per GOV-POL-04 Data Protection and Privacy Policy.

12. Revision History

Version	Date	Author	Description of Changes
1.0	2026	HR Manager	Initial release as Tier 3 Topic Policy. Establishes Slow's grievance mechanism and whistleblower channel for all stakeholder groups. Aligned with UNGPs Principles 29-31 and the EU Whistleblower Protection Directive. Operationalised through GOV-SOP-01.

Sign-Off

Role	Name	Signature & Date
HR Manager	Margareth Theodora	Signed by:  Date: 6/1/2026

Chief Impact Officer	Sabrina Mustopo	<p>Signed by:  18ED5D25334E4E4 Date: 6/1/2026</p>
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