

SLOW

Regenerative Cocoa & Coffee

Workplace Equality, Diversity, Inclusion and Anti-Harassment Policy

Slow's commitment to a respectful, inclusive, and harassment-free workplace

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Document Title	Workplace Equality, Diversity, Inclusion and Anti-Harassment Policy
Document Type	Topic Policy (Tier 3)
Tier	Tier 3 — Topic Policies
Version	1.0
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Owner	HR Manager
Approver	Chief Impact Officer (CIO)
Geographic Scope	All Slow employees, contractors, directors, officers, interns, and any third party engaged in Slow's workplaces or work-related settings, in all countries of operation
Standards Alignment	ILO Conventions 100, 111, 190; UN Guiding Principles on Business and Human Rights; SA8000; SMETA; EcoVadis; B Corp; UN Global Compact

1. Policy Statement

Slow is committed to a workplace in which every person is treated with dignity and respect. Equal opportunity, freedom from discrimination and harassment, and a culture of inclusion are foundational to how Slow operates and to the impact we seek to have on the people in our value chain.

This Policy establishes Slow's commitments and behavioural expectations on workplace equality, diversity, inclusion, and the prohibition of all forms of discrimination, harassment, bullying, and retaliation. It applies to conduct in Slow workplaces and in any work-related setting outside the workplace, including business travel, client and supplier meetings, conferences, fieldwork at sourcing sites, and work-related social events.

This Policy is the master document on workplace equality, diversity and inclusion (EDI), and anti-harassment for Slow. It is read together with HR-POL-02 Living Wage and Fair Compensation Policy, HR-POL-03 Employee Engagement and Wellbeing Policy, SOC-POL-01 Human Rights Policy, and GOV-POL-05 Grievance and Whistleblower Policy.

2. Scope

This Policy applies to:

- All Slow employees (permanent, fixed-term, part-time, full-time), interns, and apprentices.
- All directors, officers, and contractors with an ongoing engagement.
- Field staff, farmer coordinators, and Country Implementation Leads, and any temporary or seasonal workers engaged on Slow direct operations.
- Suppliers, customers, visitors, and third parties when interacting with Slow personnel or operating in Slow workplaces. Suppliers are additionally bound by SUP-POL-02 Supplier Code of Conduct.

Conduct covered by this Policy includes in-person interactions, written and electronic communication (including email, chat, video, and social media), and any conduct in any work-related setting.

3. Definitions

The following definitions apply throughout this Policy. They are read alongside any stricter definitions in applicable local law; where local law provides broader protection, local law applies.

- **Discrimination:** any negative action, attitude, or unequal treatment directed toward a person because of, or associated with, a protected characteristic, including in hiring, assignment, training, promotion, compensation, discipline, or termination.
- **Protected characteristics:** race, colour, ethnicity or nationality, national origin, religion or belief, sex, gender identity or expression, sexual orientation, age, disability, marital or family status, pregnancy or maternity or paternity, citizenship or migration status, membership of a workers' organisation or trade union, political opinion, social origin, genetic information, health status (including HIV status), and any other characteristic protected under applicable law.
- **Harassment:** unwelcome conduct, whether verbal, non-verbal, physical, or electronic, that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment, whether or not connected to a protected characteristic.
- **Sexual harassment:** unwelcome sexual advances, requests for sexual favours, suggestive comments, jokes, gestures, looks, sharing of obscene material, requests for quid pro quo sexual favours, or any other unwelcome physical or verbal conduct of a sexual nature, in person or electronic.
- **Bullying:** repeated, unreasonable behaviour directed toward a person or group that creates a risk to health, safety, or dignity, including malicious gossip, intimidation, undermining, or persistent unwarranted criticism.
- **Retaliation:** any adverse action against a person who, in good faith, raises a concern, files a grievance, supports another person's complaint, or participates in an investigation. Retaliation is itself a serious breach of this Policy.

- **Diversity:** the presence of a wide range of human differences within Slow's workforce and value chain, including but not limited to the protected characteristics above, and including socio-economic background, life experience, and perspective.
- **Inclusion:** the active practice of ensuring that people of all backgrounds feel respected, heard, and able to contribute fully, with equitable access to opportunity and decision-making.

4. Core Commitments

4.1 Equal Opportunity and Non-Discrimination

Slow provides equal opportunity in all aspects of employment and engagement, including recruitment, hiring, assignment, training, development, promotion, transfer, compensation, benefits, discipline, and termination. Decisions are based on objective, role-related criteria such as qualifications, performance, and conduct, and never on protected characteristics.

Slow does not test for pregnancy, HIV/AIDS, or genetic conditions during recruitment, and does not require medical assessments except where there is a direct, role-specific health and safety justification consistent with applicable law.

4.2 Zero Tolerance for Harassment, Bullying, and Violence

Slow has zero tolerance for harassment, sexual harassment, bullying, intimidation, abusive behaviour, and any form of physical or verbal violence. Such conduct is prohibited in the workplace and in any work-related setting, regardless of whether the person involved is a Slow employee, a contractor, a supplier representative, a customer, a visitor, or a third party.

Confirmed cases may result in disciplinary action up to and including immediate termination of employment or engagement, in addition to any legal consequences.

4.3 Diversity

Slow values diversity as a strength. Slow seeks to recruit, develop, and retain people who reflect the communities and country contexts in which we operate, at all levels of the organisation, including senior management. Slow commits to:

- Building a workforce in each country of operation that includes meaningful representation from local communities, including women, ethnic minorities, and people from underrepresented groups.
- Supporting access to work experience and vocational skills training for underrepresented groups, including ethnic minorities and people with disabilities, in our origin countries.
- Reviewing recruitment and promotion processes for unconscious bias and adjusting them where evidence indicates inequitable outcomes.
- Encouraging the development of mixed teams and reporting lines that surface a range of perspectives.

4.4 Inclusion

A diverse workforce only delivers its potential when every person feels included. Slow commits to:

- A workplace culture in which respectful disagreement is welcome and personal attacks are not.

- Communication and meeting practices that allow people in all locations and time zones to participate meaningfully, with translation and language support where needed.
- Accessibility adjustments for employees with disabilities or specific health needs.
- Cultural and religious accommodation in scheduling, dress, dietary needs, and observance of holidays, where reasonable.
- Dedicated channels for groups that may be underrepresented in mixed settings, such as women-only sessions where culturally appropriate.

4.5 Sexual Harassment Specifically

Slow recognises that sexual harassment is a particular risk in workplaces with significant power imbalances, including agricultural fieldwork, supplier audit settings, and travel. Slow:

- Treats every report of sexual harassment as serious, regardless of seniority of the alleged perpetrator.
- Provides multiple, accessible reporting channels including a route that bypasses the alleged perpetrator's chain of command.
- Provides anonymous reporting channels per GOV-POL-05 and GOV-SOP-01.
- Trains managers and field staff annually on recognising and responding to sexual harassment.
- Pays particular attention to the protection of female field staff, female farmer coordinators, and women workers on supplier sites.

4.6 Freedom from Retaliation

Any person who, in good faith, raises a concern, files a grievance, supports another person's complaint, or participates in an investigation is protected from retaliation. Retaliation is treated as a stand-alone breach of this Policy and is investigated and addressed on the same terms as the original conduct.

4.7 Behavioural Expectations

All persons within scope of this Policy are expected to:

- Treat colleagues, suppliers, farmers, community members, and third parties with respect and dignity at all times.
- Reflect on their own conduct and be open to feedback, recognising that bias is sometimes unconscious.
- Speak up when they observe conduct inconsistent with this Policy, using the channels in Section 7.
- Cooperate fully and honestly with any investigation.
- Maintain confidentiality of investigations, save where disclosure is required by law or to address a serious risk.

5. Implementation Actions

To translate the commitments above into practice, Slow undertakes the following actions on an ongoing basis:

- Set objective, role-related criteria for recruitment, promotion, and pay decisions.

- Offer compensation and benefits aligned with HR-POL-02 Living Wage and Fair Compensation Policy, based on position, qualifications, performance, and seniority, never on protected characteristics.
- Deliver annual training on this Policy to all staff per MGT-06 Training and Competency Matrix, including dedicated modules on anti-harassment, unconscious bias, and inclusive management.
- Conduct an annual employee engagement survey (HR-POL-03) including questions on inclusion, fairness, and exposure to harassment or discrimination, with results reviewed by the HR Manager and CIO.
- Where an employee is found to discriminate unconsciously, support them through coaching and process change, rather than punishing isolated mistakes; deliberate or repeat conduct is subject to disciplinary action.
- Investigate every reported allegation discreetly, promptly, and impartially per GOV-SOP-01 Grievance Mechanism SOP.
- Review recruitment, promotion, retention, and pay outcomes annually for patterns of disparity by gender, country, and other protected characteristics where data permits, and act on findings.
- Monitor supplier conduct toward our personnel during audit and field visits; conduct that breaches this Policy is treated as a supplier non-conformance per SUP-POL-02.

6. Governance

The HR Manager owns this Policy and is accountable for its day-to-day implementation across Slow's operations. The CIO approves the Policy and material revisions. Country Implementation Leads support country-level implementation in coordination with the HR Manager.

Country Managers (Operations) support the practical roll-out of Policy expectations at country level (such as scheduling training, ensuring meeting venues are accessible, and reinforcing behavioural expectations) but do not investigate grievances and do not approve disciplinary outcomes; this is to preserve the conflict-of-interest separation set out in FWK-01 Section 4.6 and MGT-01.

Grievance intake and investigation sit with the HR Manager. Grievances concerning the HR Manager or senior leadership are escalated directly to the CEO. Where a complaint involves alleged criminal conduct, Slow cooperates with the relevant authorities consistent with applicable law and the wishes of the affected person to the extent possible.

7. Reporting and Investigation

Any person who experiences or witnesses conduct contrary to this Policy is encouraged to report it. Multiple channels are available:

- Direct conversation with one's line manager or country lead, where the person feels safe to do so.
- Direct contact with the HR Manager, in person, by email, or by phone.
- Submission via the grievance channel set out in GOV-POL-05 and GOV-SOP-01, including the anonymous channel.
- Direct contact with the CEO, where the concern involves the HR Manager or senior leadership.

Reports are taken seriously and handled in accordance with the principles of confidentiality, impartiality, procedural fairness, and protection from retaliation set out in GOV-POL-05. The Operations chain of command is not used for investigation; this includes Country Managers.

Standard timelines, escalation pathways, and documentation requirements are defined in GOV-SOP-01. For sexual harassment cases or any case suggesting risk to physical safety, an acknowledgement is provided within 48 hours of receipt.

8. Records and Reporting

All formal complaints, investigations, and outcomes under this Policy are logged in GOV-FRM-02 Grievance Log and CAP Tracker, held by the HR Manager. Records are confidential and access-restricted.

Aggregate, anonymised statistics are reported in:

- RPT-01 Annual Impact Report (number of grievances received, resolved, average resolution time).
- RPT-02 Board Impact Briefing (more detailed disclosure for the Board and Impact Team only, including thematic patterns and any cases involving senior leadership).

Records are retained per MGT-07 Document Control and Records Retention SOP.

9. Non-Compliance

Breaches of this Policy are addressed through Slow's disciplinary process, with consequences proportionate to severity. Sanctions may include informal coaching, formal written warning, mandatory training, reassignment, suspension, or termination of employment or engagement, in addition to any legal consequences.

Critical breaches — including sexual harassment, physical violence or threats, retaliation, and serious or repeated discrimination — are escalated to the CIO and CEO, and may result in immediate termination.

For suppliers and third parties, breaches are addressed under SUP-POL-02 and the Critical / Major / Minor non-conformance classification in FWK-01 Section 6.4.

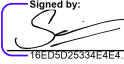

10. Related Implementation Documents and Records

- MGT-06 Training and Competency Matrix — anti-harassment and inclusion training requirements.
- GOV-POL-05 Grievance and Whistleblower Policy.
- GOV-SOP-01 Grievance Mechanism SOP.
- GOV-FRM-02 Grievance Log and CAP Tracker.
- HR-POL-02 Living Wage and Fair Compensation Policy.
- HR-POL-03 Employee Engagement and Wellbeing Policy.
- SOC-POL-01 Human Rights Policy.
- SUP-POL-02 Supplier Code of Conduct.

11. Revision History

Version	Date	Author	Description of Changes
1.0	2026	HR Manager	Initial release as Tier 3 Workplace Equality, Diversity, Inclusion and Anti-Harassment Policy. Replaces and consolidates the legacy Forest Plateau Lao Co. Ltd. Nondiscrimination & Anti-harassment Policy (v1.1, 2023) and Diversity & Inclusion Management Policy (v1.1, 2023), and integrates the workplace-conduct elements of the legacy Forest Plateau Code of Ethics (v1.1, 2023). Aligns ownership with the Impact Management System architecture (HR Manager owner; CIO approver). Adds explicit zero-tolerance for retaliation, dedicated treatment of sexual harassment, and routing of grievances through GOV-POL-05 / GOV-SOP-01 with conflict-of-interest separation from Operations.

Sign-Off

Role	Name	Signature & Date
Chief Impact Officer	Sabrina Mustopo	 Signed by: _____ Date: <u>6/1/2026</u>
HR Manager	Margareth Theodora	 Signed by: _____ Date: <u>6/1/2026</u>