

SLOW

Regenerative Cocoa & Coffee

Document Control and Records Retention SOP

Document Information

Document Code	MGT-07
Document Title	Document Control and Records Retention SOP
Document Type	Management System Document (Tier 2)
Tier	Tier 2 — Management System
Version	1.0
Status	Approved
Effective Date	2026
Next Review Date	2029
Owner	Implementation Manager
Approver	Chief Impact Officer (CIO)
Geographic Scope	All documents within Slow's Impact Management System (Tiers 1–5)
Standards Alignment	ISO 9001/14001 document control principles, EcoVadis, GDPR records-retention alignment

Document Distribution List

No.	Position / Role	Copy Number / Access
1	Chief Impact Officer	Digital access via document control system
2	Implementation Manager (owner)	Digital access via document control system
3	All document owners across the Impact Team	Digital access via document control system

No.	Position / Role	Copy Number / Access
4	HR Manager, Global Certifications and Compliance Manager	Digital access via document control system

Revision History

Version	Date	Author	Description of Changes
1.0	2026	Implementation Manager	Initial release. New document codifying document control, version management, and records retention for the Impact Management System. Previously implicit across multiple documents.

Related Documents

Code	Document Title	Relationship
Document Register	Master register of all documents with owners, approvers, cadence, and cross-references	Maintained under this SOP
All POL, SOP, MAN, FRM documents	Every document in the system	Controlled under this SOP

1. Purpose

This SOP governs how documents in Slow's Impact Management System are created, reviewed, approved, issued, revised, archived, and retained. It ensures that the right version of the right document is available to the right people, and that records are kept for the legally and contractually required periods.

2. Scope

Applies to all documents in Tiers 1 through 5. Does not apply to working drafts, meeting notes, or commercial contracts (covered by commercial document control outside this SOP).

3. Document Coding

All documents use the coding convention [TOPIC]-[TYPE]-[NUMBER]. Topic and type codes:

- Topics: FWK (Framework), MGT (Management System), ENV (Environmental), SOC (Social), SUP (Supply Chain), OHS (Occupational Health & Safety), GOV (Governance), HR (Human Resources), RPT (Reports).
- Types: FWK (framework), MGT (management), POL (policy), SOP (procedure), MAN (manual), FRM (form/log/register), RPT (report).

Example: SOC-POL-01 is the first Social policy (Human Rights Policy). SOC-SOP-02 is the second Social SOP (Child Labour Prevention and Remediation SOP).

4. Version Control

Version numbers follow the convention X.Y where X is the major version (significant change requiring re-approval) and Y is the minor version (editorial or non-substantive update).

- Version 1.0: initial approved release.
- Version 1.1, 1.2 etc.: minor updates (typo corrections, reformatting, clarification without substantive change). Signed off by document owner only.
- Version 2.0, 3.0 etc.: major revisions requiring re-approval by the named Approver.

The current version is recorded in the Document Register (see Section 7). All superseded versions are archived.

5. Approval Workflow

1. Drafting: document owner prepares draft.
2. Peer review: at least one Impact Team member reviews; reviewer is named in the revision history.
3. Consultation: relevant adjacent functions (HR, Operations, Finance, Legal) are consulted where the document touches their remit.
4. Approval: Approver named on the cover signs (electronic signature acceptable).
5. Publication: new version registered in the Document Register; obsolete version moved to the archive.
6. Cascade: training delivered per MGT-06 where the change affects operational practice.

6. Review Cadence

The review cadence is set on each document cover. Baselines:

Document Type	Cadence	Notes
Framework (Tier 1)	Every 3 years	CEO + Board approval
Management System (Tier 2)	Governance Charter, Doc Control: 3 years; Materiality, Stakeholder, Monitoring, Training: 2 years; Risk & HRDD: annual light, 2-year full	Staggered to spread load
Policies (Tier 3)	Every 3 years (most); SUP-POL-03 Third-Party Supplier Pricing reviewed annually or on material change to Anker or Fairtrade benchmarks	Staggered across 3 years so no single year has more than 3 due
SOPs and Manuals (Tier 4)	Every 2 years	EUDR SOP: annual (regulation-driven)
Forms, Logs, Registers (Tier 5)	Continuous use; reviewed annually for template updates	Aligned with Annual Impact Review

7. Document Register

The Implementation Manager maintains the master Document Register containing, for every live document: code, title, tier, owner, approver, current version, effective date, next review date, cadence, related documents, and standards mapping. The Register is the single source of truth for what is in force. It is held in the document management system and access-controlled: read access for all staff, edit access for the Implementation Manager only.

8. Records Retention

Records (Tier 5 documents and underlying evidence) are retained per the schedule below. Where multiple obligations apply, the longer period governs.

Record Type	Retention Period	Basis
EUDR Due Diligence Statement	5 years minimum	Regulation (EU) 2023/1115, Article 12
Geolocation and traceability records	5 years minimum	EUDR
Supplier audit reports and CAPs	5 years	SMETA, EcoVadis expectation
Grievance records	7 years after case closure	UNGP effectiveness criteria; legal evidence
OH&S incident records	10 years; fatality records permanent	Local law typically requires 5–10 years; ISO 45001
Employment records (contracts, payroll)	7 years after end of employment	Local law; varies by jurisdiction
Wage benchmark records	7 years	EcoVadis, SA8000
Training records	5 years minimum	SMETA
GHG inventory data	10 years	GHG Protocol; SBTi verification
FPIC records	Permanent (or life of engagement plus 10 years)	IFC PS7; community accountability
Board papers on impact matters	Permanent	Corporate governance
Personal data (GDPR)	Only as long as required for stated purpose	GDPR data minimisation; see GOV-POL-04

9. Archive and Destruction

Superseded documents are moved to the archive folder, marked "superseded," with their supersession date. They remain accessible for audit. Records past retention are destroyed (or securely deleted for digital records) on an annual cycle by the Implementation Manager, with destruction logged.

10. Confidentiality

Access classifications:

- Public: FWK-01, all POL documents, RPT-01.
- Internal: all MGT, SOP, MAN documents; RPT-02.
- Restricted: records containing personal data, supplier commercial data, grievance investigation files.


Restricted records are accessible only to the document owner and the CIO, plus any additional named access-holders specified in the record.

11. Revision History

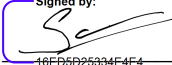
This SOP is itself subject to the controls it describes. The Revision History table on the cover of every document is the authoritative record of changes.

Approval

Prepared By

Role	Name	Signature & Date
Prepared by: Implementation Manager	Dinh Dai Nguyen	<p>Signed by:  71807CB5E6ED4EE...</p> <p>Date: 5/30/2026</p>

Approved By

Role	Name	Signature & Date
Approved by: Chief Impact Officer	Sabrina Mustopo	<p>Signed by:  16ED5D25934E4E...</p> <p>Date: 5/31/2026</p>

Effective Date: 2026