

# SLOW

*Regenerative Cocoa & Coffee*

## Human Rights Policy

*Master policy with annexes on child labour, forced labour, farm workers, working hours, and freedom of association*

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Document Title	Human Rights Policy
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Tier	Tier 3 — Topic Policies
Version	1.0
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Next Review Date	2029
Owner	Social Lead
Approver	Chief Executive Officer and Board of Directors
Geographic Scope	All Slow employees, contractors, directors, suppliers, traders, cooperatives, smallholder farmers, and affected community members
Standards Alignment	UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance, UN Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, ILO Conventions No. 29, 87, 98, 100, 105, 111, 138, 182, SA8000, SMETA, EcoVadis, B Corp

### 1. Policy Statement

Slow is committed to respecting and advancing human rights across its entire value chain. We recognise that our activities can affect human rights directly and indirectly, and we accept our responsibility to identify, prevent, mitigate, and remediate adverse human rights impacts, consistent with the UN Guiding Principles on Business and Human Rights.

This Policy is the master human rights policy for Slow. It consolidates previously separate policies on human rights, child labour, and forced labour, and adds explicit coverage of farm workers, working hours, and freedom of association. Detailed operational requirements sit in the SOPs referenced throughout.

## 2. Scope

This Policy applies to:

- All Slow employees, contractors, directors, officers, and interns globally.
- All direct and indirect suppliers of cocoa, coffee, and related goods and services.
- All smallholder farmers in Slow's supply chain (directly or via cooperatives and traders).
- All service providers, logistics partners, and third parties acting on Slow's behalf.
- All workers on farms or in facilities that supply Slow, whether permanent, seasonal, family, or migrant.

## 3. Guiding Instruments

Slow endorses and seeks to respect the following international instruments:

- Universal Declaration of Human Rights (1948).
- International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights.
- ILO Declaration on Fundamental Principles and Rights at Work (1998).
- ILO Core Conventions No. 29 and 105 (forced labour); No. 87 and 98 (freedom of association and collective bargaining); No. 100 and 111 (equal remuneration and non-discrimination); No. 138 and 182 (minimum age and worst forms of child labour).
- UN Guiding Principles on Business and Human Rights (2011).
- UN Declaration on the Rights of Indigenous Peoples (2007) — see SOC-POL-02 for implementation.
- OECD Due Diligence Guidance for Responsible Agricultural Supply Chains.

## 4. Core Commitments

Slow commits to:

- Respect all internationally recognised human rights, including but not limited to those set out in the instruments above.
- Conduct ongoing human rights due diligence across operations and value chain (see MGT-03 and SOC-SOP-01).
- Prohibit all forms of forced, bonded, trafficked, or compulsory labour (see Annex B).
- Prohibit all forms of child labour and protect young workers (see Annex A).
- Prohibit discrimination and harassment on any protected ground (see HR-POL-01).
- Respect freedom of association and the right to collective bargaining (see Annex E).
- Ensure safe and healthy working conditions (see OHS-POL-01).
- Pay living wages to employees and support living income for smallholder farmers (see HR-POL-02).
- Respect working hours limits and provide rest periods (see Annex D).
- Provide access to effective remedy for those adversely affected (see GOV-POL-05 and GOV-SOP-01).
- Pay particular attention to individuals or groups at heightened risk (women, migrant workers, indigenous peoples, children, persons with disabilities). Specific commitments on gender equity and women's empowerment are set out in SOC-POL-03 Gender Equity and Women's Empowerment Policy.

- Expect business partners to uphold equivalent standards (see SUP-POL-02 Supplier Code of Conduct).
- Publish annually on human rights performance (RPT-01).

## 5. Governance

The Social Lead owns this Policy and is accountable for its implementation across the value chain. The CIO approves operational changes; the Board approves substantive revisions. Country Implementation Leads execute operational due diligence and site-level engagement.

Grievance intake and investigation sits with the HR Manager, not with Operations or country management. Grievances concerning the HR Manager or senior leadership are escalated directly to the CEO. The Social Lead leads investigations of human rights impacts — including all suspected cases of child labour or forced labour — and coordinates with the HR Manager on grievance-sourced inputs. Where a child labour or forced labour concern is received via the general grievance form, the HR Manager forwards it to the Social Lead within 24 hours.

## 6. Implementation

This Policy is operationalised through:

- SOC-SOP-01 Human Rights Due Diligence SOP.
- SOC-SOP-02 Child Labour Prevention and Remediation SOP (implementing Annex A).
- SOC-SOP-03 FPIC Implementation SOP (with SOC-POL-02).
- SOC-SOP-04 Community Engagement SOP (with SOC-POL-02).
- GOV-SOP-01 Grievance Mechanism SOP.
- SUP-SOP-01 Supplier Risk Assessment and DD SOP.

Evidence records:

- SOC-FRM-01 Human Rights Risk Register.
- SOC-FRM-02 FPIC Records.
- SOC-FRM-03 Age Verification Form.
- SOC-FRM-04 Worker Interview Template.
- GOV-FRM-02 Grievance Log and CAP Tracker.

## 7. Non-Compliance

Non-compliance with this Policy is classified per the Framework (FWK-01 Section 6.4) as Critical, Major, or Minor. Critical findings (including any case of child labour in its worst forms, forced labour, retaliation, or severe harm) trigger immediate escalation to the CIO and CEO, with remediation taking precedence over commercial considerations.

Slow's default approach is to remediate and continue engagement. Termination of a supplier relationship occurs only where the supplier demonstrates unwillingness to remediate, repeatedly reoffends, or has committed a critical violation without genuine corrective action.

## 8. Revision History

Version	Date	Author	Description of Changes
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1.0	2026	Social Lead	Initial release as Tier 3 Human Rights Policy. Replaces and consolidates: Human Rights Policy draft v2 (2025), Forced Labor and Modern Slavery Policy draft v2 (2025), Zero Child Labor Policy (Slow CSR Policy v1.2, 2024), and the Human Rights sections of the Sustainability Governance Policy v1.0 (2025). Adds explicit Annexes on Farm Workers, Working Hours, and Freedom of Association. Aligns ownership with the Impact Management System architecture (Social Lead owner; CEO and Board approvers).
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## Annex A — Child Labour and Young Workers

### A.1 Definitions

- Child labour: work that deprives children of their childhood, their potential, or their dignity, and that is harmful to their physical or mental development, per ILO Convention 138.
- Worst forms of child labour: slavery, trafficking, debt bondage, forced recruitment, commercial sexual exploitation, illicit activities, and hazardous work, per ILO Convention 182.
- Young worker: any worker aged 15 to 17, subject to protections against hazardous work and excessive hours.
- Light work by family members on smallholder family farms: permitted only under the strict conditions in A.4.

### A.2 Prohibition

Slow prohibits all forms of child labour in its operations and supply chain. The minimum working age is 15, or the age of compulsory schooling in the relevant jurisdiction, whichever is higher. Where local law sets a lower minimum age (e.g. 14 in specific developing-country contexts permitted by ILO), Slow applies 15 as the floor.

### A.3 Young Workers (15–17)

- Must not perform hazardous work as defined in ILO 182 or locally-defined hazardous work lists.
- Must not work at night (generally 22:00 to 06:00).
- Must not work hours that interfere with schooling.
- Working hours capped per local law and Annex D.

### A.4 Family Members on Smallholder Farms

Slow recognises that family members, including those under 15, may help on smallholder family farms. This is permitted only where ALL of the following apply:

- The work is outside school hours and does not interfere with schooling.
- The work is appropriate to age and physical capacity (light work only).
- The work is supervised by a parent or guardian.

- The work is not on hazardous tasks (including, but not limited to: applying agrochemicals, operating machinery, working at height, lifting heavy loads, handling sharp tools beyond supervised basic tasks).
- Working hours do not exceed 2 hours per day on school days or 4 hours per day on non-school days.

## A.5 Remediation

Where a case of child labour is identified, Slow's approach is child-centred remediation, not termination. The child's best interests govern all actions. See SOC-SOP-02 Child Labour Prevention and Remediation SOP for the full protocol including age verification, withdrawal from hazardous work, return to school, family income support, and case monitoring.

# Annex B — Forced Labour and Modern Slavery

## B.1 Definitions

- Forced labour: all work or service exacted from any person under the menace of any penalty and for which the person has not offered themselves voluntarily (ILO Convention 29).
- Modern slavery: includes slavery, servitude, forced or compulsory labour, and human trafficking.
- Debt bondage: work performed to repay a debt, where the debt becomes perpetual or disproportionate to services rendered.

## B.2 Prohibited Practices

Slow prohibits the following practices in its operations and supply chain:

- Any form of forced, bonded, or compulsory labour.
- Retention of workers' original identity documents or passports.
- Charging workers directly for recruitment fees (including application, medical, visa, travel, or deposit fees) in Slow's own hiring processes. Where third-party recruiters are used, Slow requires that no fees are charged to workers; where such fees are identified, Slow works with the recruiter to eliminate or reimburse them.
- Debt-based coercion or wage deductions designed to bind workers to the employer.
- Use of prison labour unless consistent with international law and worker consent.
- Confinement of workers to the workplace or restrictions on freedom of movement outside working hours.
- Threats, violence, intimidation, or punishment to control workers.

## B.3 Migrant Worker Protections

Migrant workers face heightened risk of forced labour and deserve specific protections:

- Employer-pays principle: Slow applies this principle to its own direct hiring. For migrant workers recruited through third parties, Slow requires recruiters to confirm no fees have been charged to workers, and investigates and remediates any identified fees as a priority.
- Written contracts in the worker's native language.
- Contracts honoured as agreed; no substitution of terms upon arrival.
- Freedom to leave employment with reasonable notice.

- Access to grievance channels in native language.

## B.4 Due Diligence

Forced labour risk is assessed in MGT-03 (Risk Register). Supplier-level forced labour indicators are checked at onboarding and audit per SUP-SOP-01. Worker interviews (SOC-FRM-04) include targeted questions on coercion, document retention, and recruitment fees.

## B.5 Modern Slavery Statement

Slow publishes an annual Modern Slavery Statement summarising risk, due diligence activities, training, and remediation, in alignment with applicable transparency legislation (e.g. UK Modern Slavery Act Section 54 where Slow meets revenue thresholds). The Statement is integrated into RPT-01 Annual Impact Report.

## Annex C — Farm Workers

Most workers in Slow's supply chain are farmers or farm workers. This Annex establishes specific expectations:

- Written agreements: where farm workers are engaged by Slow direct farms or by suppliers, written agreements in the local language specify wage, hours, role, and termination terms.
- Wages: at or above the legal minimum wage and working towards the Anker Living Wage benchmark per HR-POL-02.
- Payment: in legal tender, on time, with a clear payslip; wage deductions only where legally permitted.
- Working hours: see Annex D.
- Seasonal workers: entitled to the same protections as permanent workers on a pro-rata basis.
- Housing (where provided): meets minimum standards of safety, hygiene, and privacy.
- Agrochemical safety: PPE provided; training in local language; no exposure for pregnant or breastfeeding workers.
- Freedom of movement: no restrictions outside working hours.
- Access to grievance channels: including anonymous options (see GOV-SOP-01).

## Annex D — Working Hours and Rest

Standard working hours across Slow operations:

- Regular hours: as set by applicable local law and regulation. Where local law does not specify, Slow applies the standard of 8 hours per day and 40 hours per week for full-time employees.
- Overtime: voluntary, compensated at the legally required premium, and capped at 12 hours per week (aligned with SMETA/SA8000); in no case shall total weekly hours exceed 60 including overtime except in documented emergencies.
- Rest periods: at least one day of rest per 7-day working period.
- Breaks: at least 30 minutes for meals during a working day longer than 6 hours.
- Young workers: maximum 8 hours per day, with tighter limits in local law applying where applicable.
- Pregnant and breastfeeding workers: no night work; breastfeeding breaks provided.

- Annual leave: minimum per local law; paid public holidays observed.
- Sick leave: per applicable local law and regulation.

Where local law exceeds these standards, local law applies. Where local law is lower, Slow applies the international standard or Slow’s standard, whichever is more protective.

## Annex E — Freedom of Association and Collective Bargaining

### E.1 Commitment

Slow respects the rights of workers to form and join organisations of their choice and to bargain collectively, consistent with ILO Conventions 87 and 98. Slow does not interfere with the establishment, functioning, or administration of such organisations.

### E.2 Protections

- No retaliation against workers who exercise their right to organise or bargain.
- No blacklisting of workers based on union membership or activity.
- Worker representatives are allowed to carry out their representative functions in the workplace.
- Collective bargaining agreements, where they exist, are honoured.


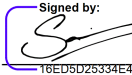
### E.3 Where Legal Restrictions Apply

In jurisdictions where freedom of association or collective bargaining is legally restricted, Slow supports alternative, genuine mechanisms for worker voice and representation (e.g. workers’ committees, joint consultation bodies). Such alternatives are not a substitute for full rights where they are legally available.

### E.4 Applicability to Farm Workers and Smallholders

Slow supports the development of farmer cooperatives and producer organisations as mechanisms for collective voice. Slow engages with such organisations as legitimate representatives of farmer interests.

## Sign-Off

Role	Name	Signature & Date
Chief Executive Officer	Sebastian Nielsen	<p>Signed by:    <small>F57F3AB3E23746F...</small></p> <p>Date: <u>5/31/2026</u></p>
Chief Impact Officer	Sabrina Mustopo	<p>Signed by:    <small>18ED5D25334E4E4...</small></p> <p>Date: <u>5/31/2026</u></p>

Social Lead	Saya Abdullahi	<p>Signed by: <i>Saya Abdullahi</i> 2802048677E449...</p> <p>Date: <u>5/31/2026</u></p>
Chair, Board of Directors	Morten Rosse	<p>Signed by: <i>MR</i> 8CE8A2A150A14E0...</p> <p>Date: <u>5/31/2026</u></p>

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