

SLOW

Regenerative Cocoa & Coffee

Community Engagement, FPIC and Social Impact Policy

Slow's commitments to the communities, indigenous peoples, and landholders affected by its sourcing

Document Code	SOC-POL-02
Document Title	Community Engagement, FPIC and Social Impact Policy
Document Type	Topic Policy (Tier 3)
Tier	Tier 3 — Topic Policies
Version	1.0
Status	Approved
Effective Date	2026
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Owner	Social Lead
Approver	Chief Impact Officer (CIO)
Geographic Scope	All Slow operations, sourcing sites, and any activity that affects local communities, indigenous peoples, or customary land and resource rights
Standards Alignment	UN Declaration on the Rights of Indigenous Peoples (UNDRIP), ILO Convention 169, IFC Performance Standard 1 and 7, UN Guiding Principles on Business and Human Rights, Accountability Framework initiative, OECD Due Diligence Guidance, B Corp, EcoVadis

1. Policy Statement

Slow recognises that its sourcing activities affect farming communities profoundly. Our long-term success depends on genuine relationships built on mutual benefit, respect for local rights, and meaningful dialogue. This Policy establishes Slow's commitments to the communities in which we work — including indigenous peoples and customary landholders — and the principles that govern our engagement with them.

Slow's approach goes beyond consultation. We seek to generate measurable positive social impact in our sourcing landscapes, implement Free, Prior and Informed Consent (FPIC) where

activities affect indigenous peoples or customary land rights, and maintain an accessible grievance channel for affected communities.

2. Scope

This Policy applies to:

- All Slow direct operations (farms, processing facilities, offices) and any expansion or closure of such operations.
- All supplier operations where Slow has influence, including farmer cooperatives and traders.
- Any new sourcing engagement in a geography or with communities where Slow has not previously operated.
- Any activity involving land acquisition, land-use change, or use of community natural resources. Where Slow acquires privately-owned farmland (not community or customary land), the full social due diligence process for affected communities may be initiated at or before closing and completed within 90 days of the transaction close. Slow's acquisitions to date have involved privately-owned farm assets; the rights and protections in this Policy apply to affected farm workers in all cases. Full FPIC obligations apply where community or indigenous land is affected.

3. Guiding Instruments

- UN Declaration on the Rights of Indigenous Peoples (UNDRIP), 2007.
- ILO Convention 169 on Indigenous and Tribal Peoples in Independent Countries.
- IFC Performance Standard 1 (Assessment and Management of E&S Risks) and 7 (Indigenous Peoples).
- UN Guiding Principles on Business and Human Rights.
- Accountability Framework initiative (AFi) Core Principles — including FPIC.
- OECD Due Diligence Guidance for Responsible Agricultural Supply Chains.

4. Core Commitments

4.1 Meaningful Community Engagement

Slow engages with affected communities before, during, and after operational decisions. Engagement is:

- Culturally appropriate and conducted in local languages.
- Inclusive of women, elders, youth, and marginalised groups, with dedicated channels where cultural norms limit mixed participation.
- Two-way: we listen and respond, not broadcast.
- Documented: inputs are logged and their influence on decisions is tracked.
- Ongoing: not a one-off event tied to a specific decision.

4.2 Free, Prior and Informed Consent (FPIC)

Where Slow's activities affect the lands, territories, resources, or customary rights of indigenous peoples or local communities, Slow obtains their Free, Prior and Informed Consent before commencing activities. FPIC is applied as follows:

- Free: consent is given without coercion, intimidation, or manipulation.
- Prior: consent is sought sufficiently in advance of any activity, with time for communities to understand, deliberate, and decide.
- Informed: communities receive full information about the project's nature, scale, duration, anticipated impacts, and benefits in accessible formats.
- Consent: decision-making processes follow the community's own customs and institutions; consent may be withheld, and withholding is respected.

Implementation is specified in SOC-SOP-03 FPIC Implementation SOP. Records are maintained in SOC-FRM-02 FPIC Record.

4.3 Social Impact Assessment

For any new site or material change to an existing site, Slow conducts a Social Impact Assessment (SIA) commensurate with the potential risks and impacts. The assessment covers land rights, livelihoods, cultural heritage, access to resources, worker and community safety, and cumulative effects. Findings inform project design, mitigation measures, and community benefit arrangements.

Timing: the SIA must commence no less than 60 days prior to any binding acquisition decision or material operational change, with a target of 90 days where the deal calendar permits. Where commercial urgency drives a shorter window, the Social Lead must document the constraint, identify which SIA elements were de-scoped or deferred, and obtain written CIO approval before the acquisition closes. Post-closure backfill of any deferred SIA element is mandatory and tracked through SOC-FRM-01.

Procedure: the SIA is conducted under SOC-SOP-04 Community Engagement SOP, which sets out the step-by-step methodology, evidence requirements, sign-offs, and links to the FPIC process (SOC-SOP-03). A standalone SIA SOP is not maintained; SOC-SOP-04 is the single procedural home.

4.4 Positive Social Impact

Beyond avoiding harm, Slow works with communities to generate positive impact. Typical interventions include:

- Agroforestry and training programmes that raise farm productivity and resilience.
- Direct farmer premiums and floor pricing aligned with living income benchmarks (see HR-POL-02).
- Support for community infrastructure where requested and where Slow has the capacity to contribute. Slow is a commercial enterprise and not an NGO; infrastructure support is offered on a best-efforts basis and is not a guaranteed commitment.
- Women's empowerment and access to economic opportunity (see SOC-POL-03 Gender Equity and Women's Empowerment Policy for substantive commitments and SOC-SOP-06 Gender and SGBV Programme SOP for implementation).
- Partnerships with civil society on shared objectives (e.g. WWF Vietnam agroforestry transition).

4.5 Land Rights

Slow respects all recognised forms of land tenure, including customary and collective tenure. Slow does not participate in land acquisitions that displace communities, violate customary rights, or occur without FPIC. Where land acquisition by Slow or a supplier is unavoidable, Slow

follows the Land Acquisition Manual (currently held by Slow Laos; to be revised and incorporated as FPIC-MAN within SOC-SOP-03).

4.6 Cultural Heritage

Slow identifies and respects tangible and intangible cultural heritage in its operating areas. Any planned activity that may affect cultural heritage is subject to FPIC and, where appropriate, independent cultural heritage assessment.

4.7 Access to Grievance

Affected communities have access to Slow’s grievance mechanism in their local language, with accessible channels appropriate to the context (in-person, phone, written, community representative). See GOV-POL-05 and GOV-SOP-01.

5. No-Go Areas

Slow will not commence or continue sourcing where any of the following apply, unless a resolution consistent with UNGPs is agreed with affected parties:

- Active, unresolved land disputes.
- Credible allegations of forced displacement.
- Withheld FPIC from indigenous or local communities.
- Activities in legally protected areas where legally prohibited, or in buffer zones in ways that undermine conservation objectives.
- Continued activity on land deforested after 31 December 2020 (see ENV-POL-03).

6. Governance

The Social Lead owns this Policy. Country Implementation Leads execute engagement and FPIC processes at country level, with oversight from the Social Lead. The CIO is briefed on any significant community issues and approves community engagement strategies for new sourcing areas.

7. Implementation

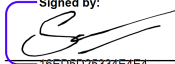
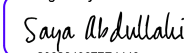
- SOC-SOP-03 FPIC Implementation SOP.
- SOC-SOP-04 Community Engagement SOP.
- SOC-SOP-05 Smallholder Farmer Engagement and Programme Design SOP.
- MGT-04 Stakeholder Engagement Plan.
- GOV-SOP-01 Grievance Mechanism SOP (for community grievance channels).

Evidence records: SOC-FRM-02 FPIC Record; community engagement logs per country; grievance log entries per GOV-FRM-02.

8. Revision History

Version	Date	Author	Description of Changes
1.0	2026	Social Lead	Initial release as Tier 3 policy. Consolidates Social Impact and Community Engagement

Version	Date	Author	Description of Changes
			Policy (Slow CSR Policy v1.2, Section 6), existing FPIC commitments in the Sustainability Governance Policy v1.0, and the content of the existing FPIC SOP and Land Acquisition Manual v3 (which become implementation documents under SOC-SOP-03). Introduces explicit No-Go criteria and strengthens alignment with UNDRIP, AFI, and IFC PS7.

Role	Name	Signature & Date
Chief Impact Officer	Sabrina Mustopo	<p>Signed by:  <small>10ED5D26334E4E4...</small></p> <p>Date: <u>5/31/2026</u></p>
Social Lead	Saya Abdullahi	<p>Signed by:  <small>2802040677E4449...</small></p> <p>Date: <u>5/31/2026</u></p>