



# SLOW

## ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM

Version Jan 2025

# Table

ABOUT SLOW	3
ESMS SCOPE & OBJECTIVE	3
OVERVIEW OF ESMS COMPONENTS/ELEMENTS	4
CONTINUAL IMPROVEMENT OF THE ESMS	6
1. POLICY STATEMENT	7
Introduction	7
Policies	7
Policy principle	8
Actions and Implementation	9
Responsibilities & Applicability	9
Approval	9
2. IDENTIFICATION OF RISKS AND IMPACTS	10
Introduction & Purpose	10
Risk and impacts	10
Responsibilities & Applicability	13
3. RISK MITIGATION PLAN	14
Introduction & Purpose	14
Root Cause Analysis	14
Action Plan Chart and Implementation	14
Outline of Procedure/ policies	15
Supply Chain and Contractors Management	16
Responsibilities & Applicability	16
4. ORGANIZATIONAL CAPACITY AND COMPETENCY	17
Introduction & Purpose	17
Training Plan Worksheet	17
Roadmap and Time Estimate for Developing and Implementing an ESMS	18
5. EMERGENCY PREPAREDNESS AND RESPONSE	19
Introduction & Purpose	19
Applicability and Scope	19
Emergency Communications	19
Emergency Response Procedures in a Workplace	19
Emergency Response Procedures for the Products	20
Training	22
6. STAKEHOLDER ENGAGEMENT	23
Introduction & Purpose	23
Definition	23
Stakeholders	23
7. EXTERNAL COMMUNICATIONS AND GRIEVANCE MECHANISMS	24
Purpose	24
Scope	24
Grievance reporting channel	24
Confidentiality and data protection	24
Process	25
Responsibilities	26
8. ONGOING REPORTING TO AFFECTED COMMUNITIES	27
Introduction & Purpose	27
Step of FPIC	27
Format of consultation meetings	28
Responsibilities & Applicability	28
9. MONITORING AND REVIEW	29



<b>Introduction &amp; Purpose</b>	<b>29</b>
<b>Monitoring Plan</b>	<b>29</b>
<b>Auditing Protocol</b>	<b>30</b>
<b>Responsibilities</b>	<b>30</b>

Error! Bookmark not defined.

# Environmental & Social Management System (ESMS)

## About Slow

Slow, founded in 2018, is a specialty coffee and chocolate brand committed to addressing climate change and deforestation through regenerative agroforestry.

By working closely with smallholder farmers, Slow helps facilitate the shift towards sustainable farming systems that restore ecosystems, protect biodiversity and improve soil health.

With a focus on transparency and ethical sourcing, Slow ensures that its coffee and cacao are cultivated in ways that support carbon sequestration and safeguard vital natural resources. This approach not only builds environmental resilience but also improves the livelihoods of farming communities.

With operations spanning Europe (Denmark, Finland, Germany) and Southeast Asia (Singapore, Laos, Vietnam, Indonesia), Slow integrates climate-positive practices into its supply chain. Through this, the company seeks to drive lasting change by championing production systems that benefit people, ecosystems and the planet.

“To go beyond sustainability in the environmental, social, and economic aspects of our business operations, we build our impact intervention plan through three pillars **“ENVIRONMENT, SOCIAL, AND GOVERNANCE.”**”

## ESMS Scope & Objective

This ESMS builds upon the Corporate Social Responsibility (CSR) policy, which was developed in 2020. This exercise aims to address the gap between the CSR policy and ESMS requirements. Slow applies to nine elements of the ESMS that are in accordance with The International Finance Corporation (IFC) Performance Standards<sup>1</sup> to build on its existing systems. The ESMS covers Slow operations in Laos, Vietnam, Indonesia and Europe (Denmark, Finland, Germany).

The objective of the Slow ESMS is to:

- Develop appropriate policies and procedures to identify, manage, and monitor environmental, social, and governance risks,
- Integrate the practices and policies into core business operations, and
- Follow and improve ESMS implementation consistently.

---

<sup>1</sup> IFC Performance Standards on Environmental and Social Sustainability  
<https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

## Overview of ESMS components/elements

The ESMS includes nine interrelated parts, as presented in the table below. The CSR policy is an overarching foundational document for the ESMS and guides the overall ESMS strategy and its operational components.

	ESMS components	Description	Resource
1	Policy statement	The policy statement includes environmental and social policies that the company follows in conducting its business.	The CSR policy of Slow includes 15 policies on human rights, social, and environmental issues. The CSR policy was developed in 2020 and updated in May 2023. The CSR policy is the foundation of the ESMS policy statement for Slow.
2	Social and Environment Risk and Impact Assessment Framework	This framework is designed to identify the potential negative environmental and social risks of the company's business.	Slow identifies the environmental and social risks and impacts of its business. The Environmental and Social Risk and Impact Intervention Plan includes three groups: i) Environmental, ii) Labor and Working Conditions, and iii) Community Health, Safety, and Security
3	Risk Mitigation plan (Management program)	The Risk Mitigation Plan of the ESMS is developed based on the E&S Risk & Impact Assessment Framework. It includes action plans and procedures to help Slow address identified risks and impacts.	The existing policies and implementation actions of Slow that contribute to the Risk Mitigation Program are as follows: <ul style="list-style-type: none"> <li>- The CSR policy and practices, such as the Zero Child Labor Policy</li> <li>- The Zero-Deforestation Policy with updated EUDR compliance actions</li> <li>- The Annual Impact Intervention Plan that covers three aspects: Nature/Environment, Social, and Do No Harm/Governance</li> <li>- Implementation of certification standards such as EU Organic, Fair Trade, Rainforest Alliance, and Food Safety Management System (FSMS)</li> </ul> Incorporation of actions with suppliers and contractors to comply with Slow's policies/standards Slow will continue to develop forms, templates, checklists, and other useful documents to aid in implementing the ESMS
4	Organizational capacity and competency	This ESMS component focuses on incorporating ESMS implementation into relevant job descriptions, company	After expanding its business to Vietnam and Indonesia, Slow's organizational structure was updated in September 2024. Slow integrates the ESMS functions into its organizational structure. The ESMS implementation involves



		procedures, and training plans for relevant staff.	different teams, such as Impact, HR, Operations, etc.
5	Emergency preparedness and response plan	The emergency preparedness and response plan provides detailed procedures to prepare for and respond to emergencies.	Slow established the Compliance, Accountability, Risk, Ethics, and Safety (CARES) Working Team to take charge of training, monitoring, and continuous improvement on topics related to child labor, worker health and safety, and grievances. The incident and accident mechanism was developed for emergency issues at offices, factories, farm sites, and during travel. Slow continues to develop the Emergency Preparedness and Response Plan and implement training and monitoring to respond to external events such as flooding and landslides.
6	Stakeholder engagement	Stakeholder engagement provides the framework to understand the impact that the company's business has on stakeholders and to reduce reputational risks for the company.	The existing policies and practices of Slow that contribute to Stakeholder Engagement are as follows: <ul style="list-style-type: none"> <li>- The Social Impact &amp; Community Engagement Policy</li> <li>- The Zero-Deforestation Policy</li> <li>- The Free, Prior, and Informed Consent (FPIC) procedures</li> <li>- The E&amp;S Risk and Impact Assessment Framework developed by Slow as a part of the ESMS</li> </ul>
7	External communication and grievance mechanism	The mechanism provides an avenue for internal and external stakeholders to raise issues, and outlines the procedure by which issues are investigated and addressed.	Slow's grievance policy covers part of this component. The Slow CARES Working Team was established recently and is also in charge of implementing the Grievance Policy. Slow will include the external communication function as part of the grievance mechanism.
8	Communication to affected communities	This step is aimed at building and maintaining a good relationship with stakeholders to keep them informed about the company's response to their concerns or complaints.	Slow has different communication channels with stakeholders, such as Slow websites, reporting, meetings, and the Consumer Complaints Mechanism for customers. Slow has applied FPIC principles in communication with affected communities through specific activities, such as farmer engagement meetings, community consultation meetings, and planning and implementing community development projects.

9	Monitoring and review	Monitoring and review are critical components of the ESMS. They help monitor the ESMS action plans to ensure that the ESMS plan and procedures are implemented.	The Slow M&E system, involving the Impact, Operations, HR, and CARE working teams, includes: - The M&E of Impact Intervention Plan for aspects of social, environmental/nature, and do-no-harm/governance - The M&E of the EMSM implementation. Slow continues integrating the monitoring and reviewing of the E&S Risk and Impact Assessment Framework into the company M&E system.
---	-----------------------	---	---

## Continual improvement of the ESMS

To assess, control, mitigate risks, and improve operations, Slow applies the principle of continual improvement—an ongoing process of reviewing, correcting, and improving the system. Slow uses the Plan-Do-Check-Act (PDCA) cycle method recommended by the IFC standards, as outlined below:

- Identifying and analysing the risks and objectives
- Developing and implementing a potential solution
- Measuring the effectiveness of the solution and analysing whether it could be improved
- Implementing the improved solution

# I. Policy statement


## Introduction

Slow has developed the Corporate Social Responsibility (CSR) Policy, which includes 15 policies on human rights, social, and environmental matters. The CSR policy was developed in 2020 and updated in May 2023. The CSR Policy refers to the company's responsibility toward the environment and describes the overarching policies and standards governing Slow's environmental and social impact management, as well as the actions and processes for their implementation. It primarily consolidates guidelines and policy documents relevant to the subject and serves as a manual for company employees, stakeholders, and project partners.

Slow is committed to creating sustainable and ethical business growth, which is not achieved at the expense of the environment, quality of life, or social equity. This policy statement is intended to establish a reference framework to guide our business practices across our operations and from which every employee, stakeholder, and project partner can develop and strengthen socially and environmentally responsible behaviors.

## Policies

Slow develops policies that reflect relevant environmental and social policy issues related to its operations. The policies cover three areas: i) the environment of Slow's operations, ii) labor and working conditions for its employees, and iii) health, safety, and security of stakeholders. Below is a table of relevant policies of Slow.

No.	Policy	Link
	<b>Group I: Environment</b>	Please refer to the detail policies  Slow Forest CSR Policy Ver 25 Oct 2024.pdf
1	Environmental Policy	
2	Zero Deforestation Policy	
	<b>Group II: Labor and Working Condition</b>	
3	Human Rights Policy	
4	Zero Child labor policy	
5	Non-discrimination & Anti-harassment Policy	
6	Diversity & Inclusion Management Policy	
7	Employee Engagement Strategy	
8	Occupational Health and Safety Policy	
9	Grievance Policy	
10	Whistleblower Policy	
	<b>Group III: Community Health, Safety and Security</b>	
11	Code of ethic	
12	Social Impact & Community Engagement Policy	
13	Anti-Corruption and Anti-Bribery Policy	



14	Ethical Marketing and Advertisement Policy	
15	Responsible Sourcing Policy and Supplier Code of Conduct	

## Policy principle

Slow’s CSR policy covers aspects of environmental and social responsibility. The CSR policy emphasizes the harmonization of humanity, the environment, and society, and reflects this commitment across all of Slow’s operations. We apply policy principles as follows:

### To the Environment

- Continually improve our environmental performance.
- Comply with relevant environmental legislation as a minimum level of performance, but where possible, aim to go beyond the legal minimum.
- Utilize our production resources, such as raw materials, water, and energy, responsibly and efficiently.
- Follow a Zero Gross Deforestation Policy and are committed to promoting reforestation and forest conservation.
- Everyone at Slow shares responsibility for our environmental performance.
- Reduce Slow’s environmental impacts within our own offices wherever possible and offer guidance to help our employees become more sustainable and environmentally conscious in their everyday work.
- Expect our business partners and associates to also follow a responsible environmental policy.
- Observe national forest protection laws.
- Ensure we are not encouraging the clearing of forests—coffee and cocoa bought exclusively from farms that have not been converted from natural forests since the company was established in 2019.
- Commit to transparency regarding production practices.
- Maintain visibility into Slow’s supply chains; we know precisely where the commodities are coming from and ensure supply chains are traceable and transparent.

### To Employees

- Respect all internationally recognized human rights standards, including the International Bill of Rights and the ILO’s Declaration on the Fundamental Principles and Rights at Work.
- Comply with the principle that all employment with Forest Plateau Lao Co. Ltd. is voluntary, and no child or forced labor is used in any of our operations or supply chains.
- Do not tolerate any form of unacceptable treatment of workers, including but not limited to the exploitation of children, physical punishment or abuse, or involuntary servitude.
- Do not use violence, threats of violence, punishment, confinement, or any methods of intimidation to discipline or control workers that contradict their human rights.
- Respect our employees’ right to choose to join or not join a trade union or to have recognized employee representation in accordance with local law. All workers are guaranteed freedom of association, and workers’ representatives are allowed to carry out their representative functions in the workplace.
- Commit to eliminating discrimination as stated in our Antidiscrimination and Non-Harassment Policy.



- Value and advance the diversity and inclusion of the people with whom we work and do not tolerate disrespectful or inappropriate behavior, unfair treatment, or retaliation of any kind.
- Provide a safe and healthy workplace and comply with applicable safety and health laws and regulations.
- Ensure full compliance with applicable wage, work hours, overtime, and benefits laws.
- Inform employees, business partners, and customers of our commitment to human rights.

### To Society/Community

- Inform business partners and customers of our commitment to environmental and social policies.
- Understand that to efficiently manage environmental and social risks and impacts associated with our operations, these must be thoroughly identified, assessed, mitigated, and monitored.
- Consider respect for fundamental human rights in the workplace as a crucial element of sustainable development and ensure that these rights are respected as a minimum requirement in all our operations.
- Commit to the ILO conventions against forced labor and child labor and support fundamental human rights for decent work and social justice.
- Consider transparency and accountability as key elements of sustainable business development.
- Commit to advancing the interests of affected communities as a collective while also acknowledging individual voices and perspectives within the community.
- Maintain corporate governance practices based on ethics, business transparency, and diversity. We respect the rules of the free market and free competition and reject any illegal or fraudulent practice contrary to the rules of good governance.

## Actions and Implementation

To ensure that our actions effectively implement our policies, we are committed to:

- Allocating resources for policy implementation
- Raising awareness and building capacity for stakeholders and employees in the implementation process
- Setting up working teams for relevant policies
- Providing leadership commitment at Slow for policy implementation
- Establishing a Monitoring and Evaluation system

## Responsibilities & Applicability

The E&S Policy applies to all its employees worldwide, to anyone doing business for or with the Slow and to others acting on Slow's behalf. This applies to all locations where the company conducts business or any operations.

## Approval

This policy statement has been reviewed and approved by Slow management:

Sabrina Mustopo - Chief Operation Officer

Approval date: 15 January 2025

## 2. Identification of Risks and Impacts

### Introduction & Purpose

Slow is committed to developing and conducting business in a responsible and sustainable manner. With the objective of producing environmentally and socially sustainable agroforestry products, the company recognizes that it has an important role in protecting and enhancing the environment and in securing the long-term sustainability of its operations.

Slow recognizes that its supply chain, processes, and products have both direct and indirect environmental impacts and social risks associated with its operations in Vietnam, Laos, Indonesia and Europe (Denmark, Finland, Germany), which it seeks to identify and find effective ways to eliminate or reduce. Slow's aim is to achieve continuous improvement in its environmental performance. Throughout its operations, Slow regards compliance with the law as the minimum standard to be achieved and will implement additional environmental programs and efforts to go beyond compliance where possible.

The operational risks of Slow include: i) wastewater from wet mills of Slow and local processors and chocolate factory, ii) impact of agricultural activities at Slow farms and Slow-linked smallholder farms on air, water, and soil, iii) carbon emissions from farm and non-farm operations, iv) potential for deforestation/tree loss caused by cocoa and coffee plantations, and v) incident and accident risks from operations of the farms, dry mills, wet mills, and the chocolate factory. These potential risks and impacts threaten the environment, employees, and communities living around Slow's operational areas.

The E&S Risk Assessment Framework ([Referring to the below Risk Mapping Table](#)) is used to identify the potential negative environmental and social risks of Slow's operations to develop appropriate strategies to address these risks and their potential impacts.

### Risk and Impacts

Based on Slow's operation, there are three risk and impact groups that include i) Environment; ii) Labor and Working Condition and iii) Community Health, Safety and Security.

#### **Group I of Environment**

Physical impact on soil, water sources and air

#### **Group II of Labor and Working Condition**

The associated workforce within Slow's business includes permanent staff who work at the farm, office, dry mill, wet mill, and factory, as well as seasonal workers who work at Slow's farms and farmers.

#### **Group III of Community Health, Safety and Security**

Stakeholders who may be affected by Slow's operations include communities living around Slow's farms and factories.

The risks identified by SLOW are presented as the table below:



### Slow Risk Mapping Table

N°	Description of the risk identified by SLOW	Location where the risk occurs	What is impacted	Severity in case of event (low=1, medium=2, high=3, extreme=4)	Probability of occurrence (low=1, medium=2, high=3, extreme=4)	Risk prioritization (low, medium, major)
<b>Group I: Environment</b>						
1.1	Land Erosion: Can occur when coffee and shade trees are planted on steep, high terrain, resulting in compacted soil that takes longer to replenish itself.	Slow's and farmers' farms	Damage human life and crops	4	2	Major
1.2	Deforestation for planting coffee and cocoa trees within Slow's farms and smallholder (farmer) farms.	Slow's and farmers' farms	Biodiversity loss, EUDR non-compliance	4	2	Major
1.3	Material waste:					
1.3.1	* Fertilizer, pesticides, and maintenance practices: These can result in the discharge of waste materials into nearby rivers, leading to water contamination, a decline in water quality, and disruptions to aquatic ecosystems.	Slow's and farmers' farms	Damage health of workers and communities	2	3	Medium
1.3.2	* Wastewater from wet mill operations: Generates wastewater rich in organic matter, requiring proper treatment to prevent environmental pollution before disposal into the environment.	Wet mills of Slow, farmers and local processors	Damage health of workers and communities	4	2	Major
1.3.3	* Pulp waste from wet mill operations: Produces wastewater rich in organic matter and odors requiring proper treatment to prevent environmental pollution	Wet mills of Slow, farmers and local processors	Damage health of workers and communities	2	2	Low



	before disposal into the environment.					
1.3.4	* Dust waste from hulling coffee (coffee husk) and cocoa beans (cocoa husk): Dust waste can significantly impact the environment, causing air pollution, soil contamination, and water pollution. It also poses health risks such as respiratory issues (inhalation of fine particles), skin and eye irritation, and allergic reactions.	Dry mills of Slow, farmers and local processors. Chocolate factory	Damage health of workers and communities	3	2	Major
1.4	There is minimal impact on plants and animals in the area, as the area is primarily dominated by coffee plants and shading trees. Animals disturbed by land clearing have relocated, but plants struggle to grow properly due to the constant removal of grass.	Slow's and farmers' farms	Damage biodiversity	2	2	Medium
<b>Group II: Labor and Working Condition</b>						
2.1	Physical Hazards: Potential risks include musculoskeletal disorders (lifting, bending); cuts and lacerations (machinery, tools); eye injuries (dust, chemicals); and heat stress (outdoor work).	Wet mills, dry mill, chocolate factories and Slow's farms	Damage health of workers	4	2	Major
2.2	Chemical Hazards: Pesticide exposure, fertilizer handling, chemical burns (from processing chemicals), and respiratory problems (due to dust and chemicals).	Slow's farms	Damage health of workers	4	1	Low
2.3	Social Risks: Discrimination, low wages, low income, and long working hours.	Slow's and farmers' farms; Wet mills, dry mill,	Damage social well-being of workers and farmers	4	2	Major



		chocolate factories				
2.4	Child Labor: The presence of child labor remains a social risk that must be mitigated.	Slow's and farmers' farms; Wet mills, dry mill, chocolate factories	Damage social well-being of workers and farmers	4	2	Major
2.5	Occupational Diseases: Associated with dust lung disease, pesticide poisoning, hearing loss (from noise exposure), and skin conditions (due to chemical and insect exposure).	Wet mills, dry mills, chocolate factories and Slow's farms	Damage health of workers	4	2	Major
	<b>Group III: Community Health, Safety and Security</b>					
3.1	Community Health: Potential risks include wastewater from wet mills of Slow and local processors, pulp waste from wet mills, and dust waste from dry mills and the chocolate factory.	Surrounding communities of Slow's facilities & farms	Damage health of community	4	1	Medium
3.2	Security: Risks include potential conflicts between surrounding communities and Slow's private security, which protects Slow's farms and facilities.	Surrounding communities of Slow's farms	Damage security of community	4	2	Medium

### Responsibilities & Applicability

The Risk and Impact identification is applied to all operations of the Slow. The Responsibility of implementing risk and impact identification is with the Country Manager, Chocolate factory manager and Impact team.

## 3. Risk Mitigation plan

### Introduction & Purpose

The Management Program includes Action Plans and procedures to help Slow address the risks identified and prioritized in Chapter 2. The Action Plans focus on three risk categories:

- i) Preventing any potential negative impacts of the risks,
- ii) Minimizing the impact of the risks, and/or
- iii) Providing remediation for negative impacts after they have occurred.

### Root Cause Analysis

After identifying and prioritizing risks, Slow identifies their underlying root causes. The root causes are often deficiencies in the management system, such as inadequate procedures or improper training. This step is significant for mapping the underlying factors that can lead to negative impacts for each prioritized risk. This step is implemented during annual intervention planning of the company including impact and operation.

### Action Plan Chart and Implementation

Slow uses the CRS policy as an overarching guidance in compliance with environmental and social. The ESMS action plan is a part of the CSR policy implementation. The identified actions to address three prioritized risk categories are presented as the table below.

Slow identifies actions that will be taken to address the prioritized risks, and to determine how the company will manage those actions.

Action	Target	Procedures	Timing	In charge staff
<b>I. Prevention potential risks</b>				
1.1 Avoid child labor risks through the implementation of the Zero Child Labor Policy.	Zero child labour case	Zero child labour guideline/policy	Ongoing	Impact team
1.2 Avoid deforestation risks through the implementation of the Zero Deforestation Policy and sustainable certification standards.	Zero deforestation case	- EUDR -DDS - EU organic certificate - Rainforest Alliance certificate	Ongoing	Impact team & Operation team
1.3 Install proper wastewater treatment systems at wet mills to prevent pollution from wastewater.	Proper wastewater deposited to environment	Wastewater treatment protocol	Before harvesting period	Operation team



1.4 Produce compost from cherry pulp waste to prevent pollution from solid waste.	Compost are produced from pulp waste	Compost guideline	During harvesting period	Operation team
1.5 Provide training for local processors on wastewater and solid waste treatment.		Training curriculum	Before harvesting period	Impact team
<b>II. Minimize the potential risks</b>				
2.1 Mitigate income gaps for workers and farmers by conducting living wage and living income benchmark calculations.	Report of conduct living wages and living income benchmark calculation	conduct living wages and living income benchmark calculation guideline	Annual	Impact team
2.2 Mitigate workplace accidents and occupational health risks through the implementation of the Occupational Health and Safety Policy.	No. of working accidents are recorded	Occupational Health and Safety Policy	Regular	Impact team & Operation team
2.3 Mitigate potential risks from suppliers and contractors through the implementation of the Responsible Sourcing Policy and Supplier Code of Conduct.	No. of risk are recorded	Responsible Sourcing Policy and Supplier Code of Conduct	Regular	Impact team & Operation team
<b>III. Remediation the potential risks</b>				
Not appliable				

### Outline of Procedure/ policies

To implement the action plan of ESMS, Slow combines existing policies, standards and procedures. The relevant policy/standards/procedures are presented as below table.

<b>Risk</b>	<b>Procedures/policies</b>
<b>Group I Environment</b>	<ol style="list-style-type: none"> <li>1. Environmental Policy</li> <li>2. Zero Deforestation Policy</li> <li>3. EU organic certification standards</li> <li>4. RA certification standards</li> <li>5. EUDR – due diligence system procedures</li> </ol>
<b>Group II: Labor and Working Condition</b>	<ol style="list-style-type: none"> <li>1. Human Rights Policy</li> <li>2. Child labour policy</li> <li>3. Non-discrimination &amp; Anti-harassment Policy</li> <li>4. Diversity &amp; Inclusion Management Policy</li> <li>5. Employee Engagement Strategy Policy</li> <li>6. Occupational Health and Safety Policy</li> </ol>

	7. Grievance Policy 8. Whistleblower Policy 9. Fair Trade certification standards 10. Standard Operating Procedure for Accident Reporting
<b>Group III: Community Health, Safety and Security</b>	1. Code of ethic policy 2. Social Impact & Community Engagement Policy 3. Anti-Corruption and Anti-Bribery Policy 4. Ethical Marketing and Advertisement Policy 5. Responsible Sourcing Policy and Supplier Code of Conduct policy 6. Food safety certification scheme FSSC standards

## Supply Chain and Contractors Management

Suppliers and contractors should have ownership and accountability for their own management systems, but Slow can help them build their internal capacity to do so. To manage risks that may be caused by suppliers and contractors, Slow Forest is incorporating them into its ESMS appropriately. The table below outlines actions for supply chain and contractor management.

<b>Suppliers and Contractors</b>	<b>Potential Associated Risks and Actions</b>
Contractors for construction, coffee harvesting, and farm security	<ul style="list-style-type: none"> <li>• Child labor: Ensure understanding and implementation of the zero child labor policy in contracts and during implementation.</li> <li>• Solid waste: Ensure proper solid waste treatment for construction activities.</li> <li>• Conflict: Mitigate conflicts between surrounding communities and farm security members when violations are identified.</li> </ul>
Roasting coffee services	<ul style="list-style-type: none"> <li>• Food safety standards: Verify compliance with food safety standards before and during service contracting.</li> </ul>
Local coffee processors	<ul style="list-style-type: none"> <li>• Wastewater and solid waste: Ensure proper wastewater and solid (cherry pulp) waste treatment during service contracting.</li> </ul>
Suppliers and service providers (e.g., logistics companies)	<ul style="list-style-type: none"> <li>• Code of Conduct and Responsible Sourcing Policy compliance: Ensure compliance with the Code of Conduct and Responsible Suppliers and Service Providers Policy by applying the Responsible Sourcing Policy and Supplier Policy.</li> </ul>
Suppliers of ingredients for chocolate and coffee (e.g., green coffee beans)	<ul style="list-style-type: none"> <li>• Food safety standards: Verify compliance with food safety standards before and during service contracting.</li> <li>• EUDR compliance: Check EUDR compliance for coffee and cocoa plantations (e.g., from cocoa butter suppliers).</li> </ul>

## Responsibilities & Applicability

While it is the Impact team's responsibility to define the company's social and environmental Impact Intervention Plan, it is the responsibility of the Operations team to implement the policies and measures, be in constant dialogue with field staff and suppliers, and to report on any potential breaches.



## 4. Organizational Capacity and Competency

### Introduction & Purpose

In order to develop organizational capacity, Slow will train its staff appropriately. The training program aims to raise participants’ awareness about the ESMS, develop participants’ commitment to the ESMS, and teach participants how to implement the ESMS. Each training module should have a specific goal aligned with these objectives. Tools related to this element include:

- Training Plan Worksheet
- Roadmap and Time Estimate for Developing and Implementing an ESMS

### Training Plan Worksheet

DEPARTMENT	RELEVANT TOPICS FOR TRAINING		
	ESMS basic	Department or role specific	General
<b>Whole company</b>	Introduction to IFC Performance Standards and Slow’s ESMS		
<b>Impact team, HR department, Country Managers and Deputy Country Managers, Farm and Factory Managers</b>	Introduction on how to operationalize ESMS	Environmental legal requirements; Identification and evaluation of environmental and social risks and impacts;	Root cause analysis; Stakeholder engagement; Monitoring of performance indicators; Environmental and social reporting.
<b>HR Department</b>	Introduction to ESMS and IFC Performance Standard 2 – Labor and Working Conditions	Hiring, non-discrimination, anti-harassment, remuneration and other labour policies	Effective complaint management and resolution procedures for workers; Worker-management interaction.
<b>Farm and Factory Workers and Managers</b>		Instructions on new or modified operational procedures relevant to the tasks performed (e.g. waste management procedure; storage and handling of hazardous	Instruction on complaint management system; Worker-management interaction.

		chemicals; use and maintenance of PPE); Emergency response procedures	
<b>Procurement</b>	Contractors and supplier requirement	Supply chain assessment based on environment and social requirements; Supply chain audits.	

## Roadmap and Time Estimate for Developing and Implementing an ESMS

To ensure implementation of the ESMS, Slow has developed a timeline for action and estimate the staff time required to develop and implement its ESMS. The ESMS is a part of Slow annual operation and impact intervention plan.



The%20ESMS%20imp  
 lementation%20plan.x

[Please refer to the ESMS implementation plan for detail](#)



## 5. Emergency Preparedness and Response

### Introduction & Purpose

The management of Slow is committed to the health and safety of its employees, contractors, visitors, and anyone involved in its operations. It is committed to continuous improvement toward an accident-free workplace through effective administration, education, and training.

### Applicability and Scope

The Emergency Preparedness and Response Plan is in place to address (i) contingencies that could affect personnel, products, and facilities, (ii) the need to protect the health and safety of workers, and (iii) the need to protect the health and safety of affected communities. This plan may be consulted when responding to any type of emergency. The company empowers employees to use good judgment when encountering a situation that has not been addressed in this plan.

### Emergency Communications

During an emergency, any or all of the following means of communication and methods will be used.

- In order of priority:
  - Cell phone or WhatsApp calls (possible outages during an emergency)
  - Emails
- Emergency Sirens (if available)

### Emergency Response Procedures in a Workplace

#### **Purpose and Scope**

The purpose of this procedure is to ensure the safety of all employees, visitors, and business operations during emergencies or natural disasters. This procedure applies to all employees and visitors in the workplace. It covers various types of emergencies, such as earthquakes, floods, fires, threats, and violence in and around the workplace.

#### **Responsibility**

1. Management: Ensure that the emergency preparedness plans are in place, resources are allocated, and employees are trained.
2. Employees: Report to management or the emergency response team about emergency events that occur and follow all emergency response procedures.
3. Emergency response team (managers of dry mills, wet mills, farms and chocolate factory): Oversee emergency plans, conduct safety drills, update emergency procedures as needed, and ensure that necessary equipment and supplies are present in all designated areas.



4. Medical team/first aid responders (managers of dry mills, wet mills, farms and chocolate factory): Ensure that equipment to support health and safety is available and properly maintained.

## Emergency Preparedness

The Emergency preparedness will be implemented by countries managers and the managers of dry mills, wet mills, farms and chocolate factory with following steps.

1. Risk assessment: Conduct risk assessments to identify potential hazards relevant to the location where employees work.
2. Emergency equipment: Maintain emergency equipment in accessible areas, ensuring they contain essential supplies.
3. Emergency contact list: Maintain an updated list of emergency contacts.
4. Training: All employees are required to attend emergency response procedure training for all types of emergencies or natural disasters.
5. Emergency plan: Develop an emergency response plan, including clear guidelines for evacuation, communication, and coordination with emergency responders.

## Evacuation Procedures

1. Notification: Employees will be alerted to evacuate via emergency phone calls, text messages, or the public address system by the emergency response team.
2. Evacuation routes: Employees should leave the building calmly using designated routes.
3. Assembly areas: Once safely outside, employees must proceed to designated assembly points that are safe and away from potential hazards (e.g., parking lots, open fields).
4. Headcounts: At the assembly points, division heads or appointed coordinators will conduct headcounts to ensure all team members are accounted for before, during, and after an evacuation.
5. After assembly: Wait for further instructions at the assembly points from emergency services or company officials. Do not re-enter the building or work environment until it is declared safe by authorities.

## Emergency Response Procedures for the Products

### Purpose and Scope

This procedure serves as a guide for implementing emergency preparedness and response in the event of an emergency that could endanger the safety of products, packaging, equipment, and machines. This procedure applies to the handling of materials, equipment, or machines affected by emergencies.

### Responsibility

1. Management: Ensure that the emergency preparedness plans are in place, resources are allocated, and employees are trained.
2. Employees: Follow emergency procedures promptly and report hazards immediately.



3. Emergency response team (managers of dry mills, wet mills, farms and chocolate factory): Oversee emergency plans, update emergency procedures as needed, ensure that necessary equipment and supplies are present in all designated areas, and understand procedures for food/product safety.
4. Medical team/first aid responders (managers of dry mills, wet mills, farms and chocolate factory): Ensure that equipment to support health and safety is available and properly maintained.
5. Security personnel: Assist in coordinating the evacuation.

### **Emergency Preparedness**

The Emergency preparedness will be implemented by the country managers and managers of dry mills, wet mills, farms and chocolate factory with following steps.

1. Risk assessment: Conduct risk assessments to identify potential hazards relevant to the warehouse/manufacturing location.
2. Emergency equipment: Maintain emergency equipment in accessible areas containing essential supplies.
3. Emergency contact list: Maintain an updated list of emergency contacts.
4. Training: All employees are required to attend emergency response procedure training, including fire emergencies, natural disasters (earthquakes, flooding, etc.), medical emergencies, chemical spills, etc.
5. Keep documents in a safe place: Store important documents in a safe container that can withstand any kind of emergency.
6. Emergency plan: Develop an emergency response plan, including clear guidelines for evacuation, communication, and coordination with emergency responders.

### **Response Procedures**

1. Identify emergencies: Management or the emergency response team needs to identify emergencies that impact products and the warehouse (e.g., earthquakes, floods, fires, mass demonstrations, etc.).
2. Report to certification team: Immediately contact and report to the certification team about emergencies that occur within the company and report anything that has a direct impact on food safety/products.
3. Review the impact: The emergency response team reviews the impacts caused by emergencies on raw materials, finished products, and processes that are at risk.
4. Separate products: Separate affected products:
  - a. Products deemed unsafe are submitted for destruction to management using the Non-Conformance Report (NCR) form.
  - b. Products that are still safe are tested/inspected. If inspection results show contamination that makes the product unsafe, it will be destroyed. If inspection results show that the product is safe, it will be released.
5. Improve processes and machines: Carry out repairs to processes or machines affected by emergencies.
6. Process and machine improvement trial: Conduct trials after repairs to processes or machines are completed.
  - a. If trial results still produce an unsafe product, further improvements must be made.

- b. If trial results produce a safe product, the process or machine is approved for production.
7. Emergency response simulation: Conduct emergency response simulations (focusing on food/product safety) at least once a year.

## Training

The success of this plan requires the company to maintain a constant state of readiness. This is accomplished through carefully planned and continuous training, including scheduling training and drills, working with local emergency response services (e.g., firefighters), and ensuring clear identification of evacuation routes and meeting points. Training will be conducted by or in consultation with qualified local agencies.

The training content is expected to include the following (but is not limited to):

1. All staff shall be instructed on how to safely shut off machinery (if relevant or possible).
2. All employees shall be made aware of the fire alarm system and evacuation procedures.
3. All employees shall be familiarized with emergency exits in the buildings (where required) and evacuation routes posted by each exit.
4. All employees shall be instructed to evacuate the building in an orderly manner immediately whenever the alarm is sounded or when instructed to evacuate and shall be informed of the designated gathering areas.
5. Assisting the evacuation team where possible.
6. Orientation and assistance for new employees and visitors.
  - o Instruction on the safe use of hazardous materials (if any) for relevant personnel.

## 6. Stakeholder Engagement

### Introduction & Purpose

Slow recognizes that its activities may generate temporary and long-term impacts on the environment and the well-being of the people directly or indirectly involved, which can be both positive and negative. Therefore, the company commits to undertaking the necessary measures to prevent and mitigate these risks and negative impacts to the extent feasible, while also maximizing the positive effects.

Stakeholder engagement will help shape and inform the policy decisions we make, ensuring that our policies reflect the people they are intended for and the places they serve. We also aim to provide involved and affected stakeholders and communities with opportunities to have a say in reviewing, designing, approving, influencing, or commenting on the decisions, activities, and services of our company.

### Definition

Stakeholder engagement is the process of working collaboratively with and through groups of people affected by geographic proximity, special interests, or similar situations and addressing issues affecting the well-being of those people. It seeks to better engage the community to achieve long-term and sustainable outcomes, processes, relationships, discourse, decision-making, and implementation.

Engagement with stakeholders helps the company understand the impacts its business has on them and reduces reputational risks from anti-company sentiments or negative campaigns. Regular and systematic interactions with stakeholders can earn their trust and create a positive image for the company. In addition, stakeholders can provide valuable feedback to help the company avoid or minimize possible negative impacts from its operations.

### Stakeholders

Many different groups of stakeholders interact with Slow's business. Stakeholders include individuals, communities, or organizations that have an interest in, are affected by, or perceive themselves to be affected by the operations of Slow.

Slow has identified the following stakeholders: smallholders, local authorities and agencies, and local employees (seasonal workers and workers for Slow's wet mill and dry mill) Processors; NGOs partners; coffee cooperatives/SMEs'; Investors and coffee and chocolate clients.

Please refer to the link for the detail of the stakeholder mapping matrix.



Slow ESMS  
development stakeho

## 7. External Communications and Grievance Mechanisms

### Purpose

The Grievance Mechanism<sup>2</sup> is a non-judicial mechanism by which Slow aims to ensure the fair, timely, and objective resolution of external grievances. It provides a platform for individuals and organizations to submit a grievance if they feel they have been negatively affected by Slow's activities. The grievance channels apply to employees and external stakeholders, e.g., coffee and cocoa farmers, and surrounding communities near Slow's processing facilities that could be negatively affected.

### Scope

The Slow Grievance Mechanism procedure applies to all employees of Slow's operations and other stakeholders, such as farmers and surrounding communities. Slow has a separate Consumer Complaints Mechanism for customers.

The following criteria must be met before a grievance will be accepted:

1. A statement about a perceived or real wrong or unfair treatment for which Slow is held responsible, and
2. A factual and evidence-based grievance.

### Grievance reporting channel

For Slow employees, grievances can be submitted electronically using the online portal [Employee Grievance Form](#) or via the 'suggestion box' at Slow farms, the wet mill, and the dry mill. The complainant must ensure that the details of the complaint (please refer to Section 2 for further details), along with supporting facts and evidence, are provided to ensure prompt handling of the complaint. Providing identity and contact details is optional. The grievant also has the option to submit an anonymous complaint.

For external stakeholders, grievances can be submitted via the 'suggestion box' at Slow farms, the wet mill, and the dry mill, or by calling Slow's human resources department, whose contact information is made public during consultation meetings.

### Confidentiality and data protection

---

<sup>2</sup> UNCTAD-World Bank. Grievance redress mechanisms. Knowledge into Action Note Series 19. <https://www.worldbank.org/en/topic/agriculture/publication/responsible-agricultural-investment>





Form section containing A. Description of incident or grievance report, B. Investigation and fact finding, and C. Outcome of investigation.

Form section containing D. Decision by CARES committee, E. Next steps, and List of persons involved and timeline.

Responsibilities

Slow established the CARES (Compliance, Accountability, Risk, Ethics and Safety) Working Team who is responsible for implementing the Grievance Mechanism. The CARES working team includes Chief Operations Officer, Country Managers, HR and impact team members.

## 8. Ongoing Reporting to Affected Communities

### Introduction & Purpose

Slow applies the Free, Prior, and Informed Consent (FPIC) as a specific right granted to Indigenous Peoples (IP) and local Ethnic Minority (EM) communities within the company's operations. Indigenous Peoples are legally recognized in Indonesia, while in Vietnam and Laos, the government does not recognize ethnic minorities as Indigenous Peoples. Instead, the government uses the term "ethnic minority" to refer to everyone except the Kinh majority. Slow applies FPIC for IP and EM appropriately to align with the legal definitions in each country.

To build and maintain a good relationship with stakeholders, Slow keeps them informed about the company's response to their concerns or complaints. This mechanism aims to report back to affected communities, explain the actions the company has taken to address the issues identified during the engagement process, and communicate the outcomes of those actions.

### Step of FPIC

#### **Step 1: Preparation**

The Slow impact and operations teams will carry out initial visits to conduct quick assessments of potentially affected communities. The visit includes face-to-face meetings with village committee members and key community members, as well as observations within the potentially affected communities. The visit also includes initial assessments of potentially affected social and environmental aspects and discussions about consultation meetings (participants, timing, and meeting locations).

#### **Step 2: Consultation meetings**

The consultation process will be conducted at community houses or public places within the affected communities. Participants will include affected community members, local authorities, and related stakeholders. The consultation process will take approximately 3 hours and follow the formats below:

- Introduction of Slow and its operations
- Identification of potential social and environmental risks
- Discussion of potential risks and mitigation proposals
- Reading out the meeting minutes

#### **Step 3: Feedback**

Based on the consultation meeting minutes, Slow will send official response letters to district/commune authorities, village committees, and related stakeholders. Stakeholders will maintain contact through the information shared by Slow.

#### **Step 4: Ongoing communication and reporting to communities**

Slow will publish contact information for the village committees/communities for further communication. Communication channels, will be set up between Slow and the village committees.

Slow will continue to update and report to the village committees/communities on its operations, including potential impacts and job opportunities for the affected communities.

## Format of consultation meetings

- Place: Open houses/ community houses
- Participants: At least 50% of household representatives of a village, village committee members, local authority and related stakeholders.
- Hold by: Village committees
- Meeting content:

No	Activity	Time	Note
1	Introduction	15 minutes	By village committees
2	Sharing on Slow - Its operation - Potential social and environmental risks - Propose mitigation plan - Contact persons/information	45 minutes	By Slow
3	Plenary discussion on potential risks and mitigation plan	45 minutes	By village committees
4	<i>Tea break</i>		
5	Plenary discussion on potential risks and mitigation plan	45 minutes	By village committees
6	Read out meeting minutes	15 minutes	By village committees

## Responsibilities & Applicability

The primary responsibility for the implementation of the FPIC includes Country Managers, operation and impact team members.

## 9. Monitoring and Review

### Introduction & Purpose

Monitoring and review are critical components of the ESMS because these two activities enable Slow to check and adjust the system. The goal of the ESMS is to inspire a fundamental shift within the company. The ESMS can help Slow transition from a reactive approach to a preventive approach. Instead of addressing problems after they have already occurred (corrective actions), the ESMS enables Slow to prevent issues from becoming problems in the first place (preventive actions).

The following are key aspects of monitoring and reviewing:

- Monitor action plans to ensure that they are implemented and that procedures are being followed.
- Ensure that the ESMS is addressing the most relevant risks and promoting lasting improvements within the company.
- Review the necessary information to support the transition of ESMS implementation.

### Monitoring Plan

The monitoring plan will help Slow determine if the ESMS action plans and improved procedures are achieving established objectives. Key information about the monitoring plan is presented in the table below.

Performance Indicators	Processes Indicators	Monitoring Protocol	Monitoring records
<b>Group I: Environment</b>			
Appropriate wastewater treatment	Wastewater treatment guideline is implemented	Operational walk-through and testing water	Wastewater test records
Appropriate solid (husk) waste control	Solid waste treatment guideline is implemented	Operational walk-through	
Zero deforestation plantation	Zero deforestation guideline is implemented	Polygon checking and field visit	EUDR – DDS report
Organic practice compliance	Related farming practices compliance	EU organic standards	Field visit report EU organic audit report
Biodiversity protection at farm areas		Camera trap and field visit	Annual reports
<b>Group II: Labor and Working Condition</b>			
Zero child labour		- Spot check - Interviewing staff & workers	Child labour report
Worker housing meets ILO's standard		- Operational walk-through	- Internal audit reports

		- Interviewing staff & workers	- Grievance records
Working safety environment meets ILO's standard		- Operational walk-through - Interviewing staff & workers	- Internal audit reports - Grievance records -Standard Operating Procedure for Accident Reporting
No occupational diseases are identified		- Regular health check-up - Interviewing staff & workers	Health check-up report
<b>Group III: Community Health, Safety and Security</b>			
Zero accidents (vehicle, landslide, thieves) at surrounding communities caused by Slow's operation	Complaints on wastewater and solid waste from Slow's operation	- Interviewing community members - Grievance mechanism	- Internal audit reports - Grievance records
Zero health problem caused by waste from Slow's operation	Complaints on wastewater and solid waste from Slow's operation	- Interviewing community members - Grievance mechanism	- Internal audit reports - Grievance records

## Annual Review Protocol

Slow will conduct an **internal annual review** of its Environmental and Social Management System (ESMS). This review will provide a high-level assessment of the company's operations to ensure continued compliance and identify areas for improvement. The steps outlined below simplify the process and focus on key aspects of the ESMS.

### Key Steps

Steps	Description
I. Incident and report review	Review reports on the company's environmental and labor performance from the past year. Focus on major issues flagged in these reports, ensuring any unresolved non-conformance is noted. Summarize findings for inclusion in the management meeting.
II. Staff Discussions	Speak with a group of staff (representing various departments) to gain insights into workplace safety, labor conditions, and overall engagement. Summarize findings for inclusion in the management meeting.
III. Management Review Meeting	Conduct a meeting with senior management and department leads to discuss key updates and challenges related to ESMS



	implementation based on results from Step I and II. Present proposed changes for approval by the management team
IV. Communication of Changes	Create a company-wide memo to share results from the management meeting, and to communicate any changes.