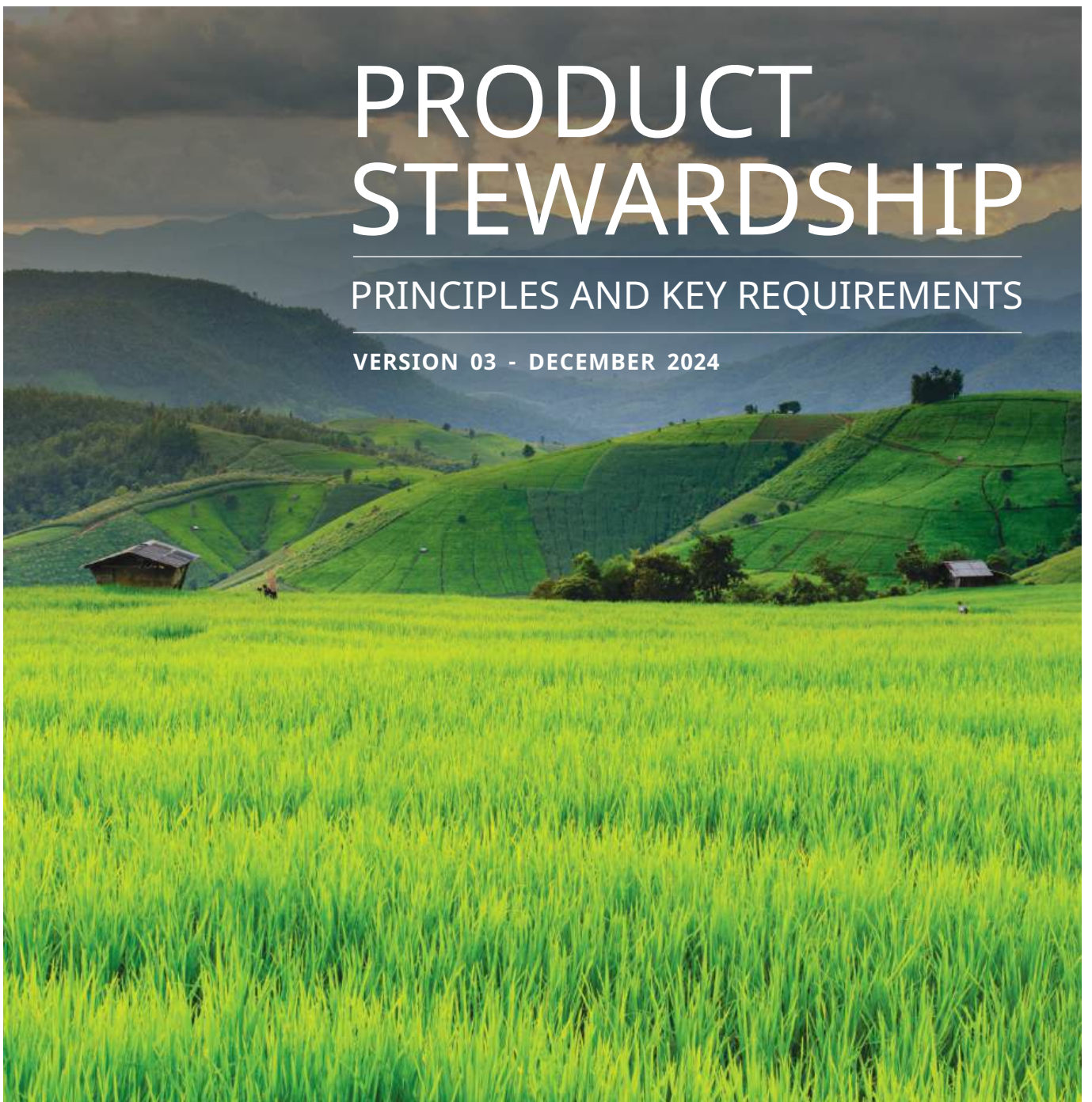




PRODUCT STEWARDSHIP

PRINCIPLES AND KEY REQUIREMENTS

VERSION 03 - DECEMBER 2024





CONTENT



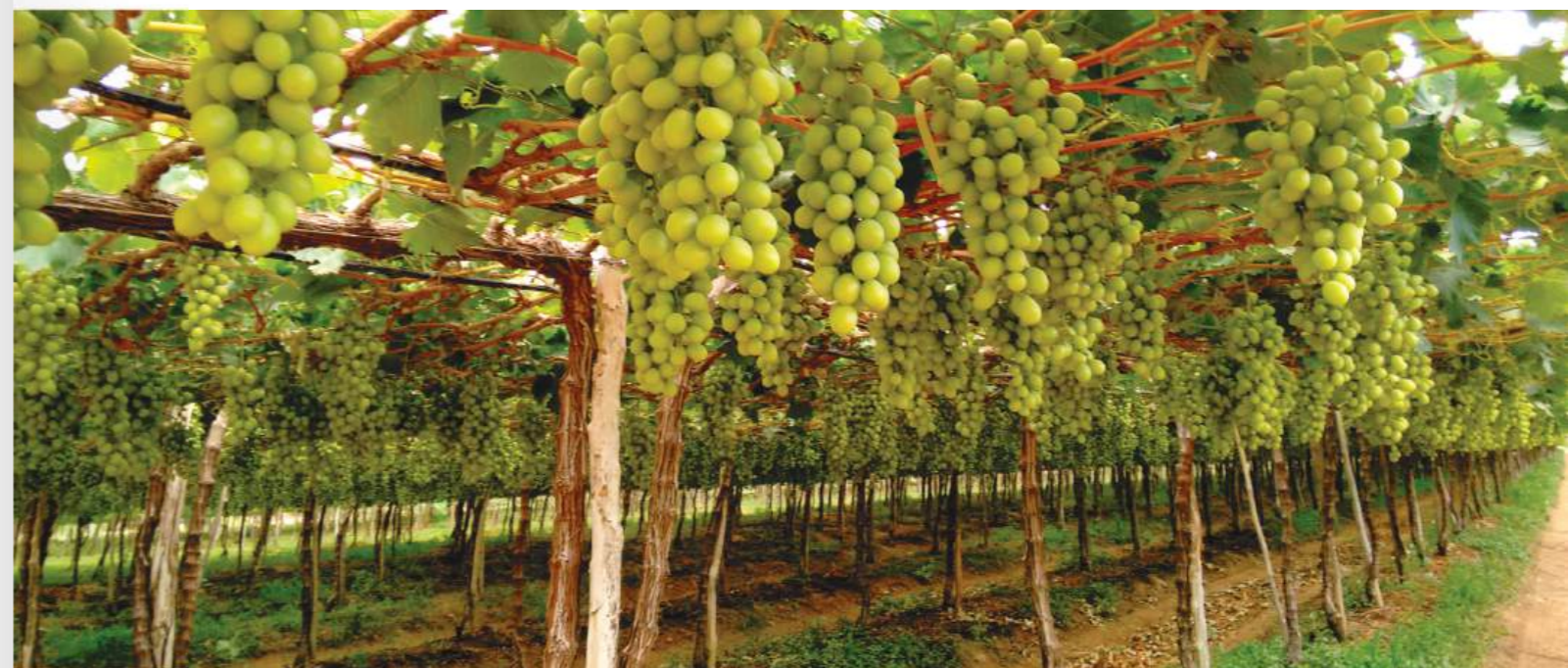
INTRODUCTION

Product Stewardship is the cornerstone of UPL's credo, ensuring safe service and highly effective products coupled with managing them throughout their life-cycle to increase efficiency and reduce potential risks to human health and the environment.



KEY PRINCIPLES

- UPL has implemented Open Ag, it's a purpose complying with integrity of environment, health and safety and product stewardships that talks about all the key aspects of responsible care and product management.
- The product life-cycle approach includes research and development, registration, manufacturing, packaging, labelling, branding, responsible use, sales, distribution, safe-handling, application, storage, transportation and finally, the management of empty product containers and obsolete stocks.
- The UPL Product Stewardship exercises considerable interest in testing the quality of its products; improvement and advances for improved seed variety development of crop solutions for integrated crop and pest Management and Resistance Management, encompassing the development of proper packaging solutions and crop production techniques, the arrangement to advance cautious product use to prevent production, import and utilization of illegal and counterfeit products.
- This UPL Product Stewardship Principles and its key requirements document is intended to support all UPL employees who must ensure the responsible and ethical management and use of the products based on high quality standards. This would strengthen the relations and partnerships with the stakeholders of UPL and in boosting public confidence.





UPL is devoted to product stewardship as a part of its business policy, thus ensuring to follow the Food & Agriculture Organisation (FAO) guidance and has used this document as the basis for its "Product Stewardship Programme."

GUIDELINES

- UPL goes by the product life-cycle approach ensuring that a stewardship programme is in compliance with relevant legislation and regulation in individual countries encompassing the following areas:
 - Research and Development
 - Registration
 - Plant Breeding
 - Manufacturing
 - Packaging
 - Labelling
 - Marketing
 - Branding
 - Sales
 - Distribution
 - Transportation
 - Responsible Use
 - Management of empty containers and the disposal of obsolete stocks.
- Development and sales of only those products which meet the environment and the safety standards.
- Manufacturing products in compliance with UPL's safety guidelines, adhering to local rules and regulations and best in class international and national policies.
- The maintenance of high quality products through our quality assurance and quality control at every single step of the manufacturing process.
- Resistance management is a huge challenge to ecology and the environment as well. UPL specializes in combining the two aspects of cost-efficiency and sustainable product solutions based on dual and triple mode of actions of an active ingredient (AI) to safeguard against resistance management.
- UPL follows high integrity in sales and marketing.
- UPL is firm about the commitment of learning from its own mistakes and the mistakes of others which may happen during the knowledge-sharing process.



Vikram Shroff
Vice-Chairman and Co-CEO, UPL Group

IMPLEMENTATION



UPL ENSURES
PRODUCT STEWARDSHIP
THROUGH MULTIPLE
TRAINING OF ITS
EMPLOYEES AND
CUSTOMERS



IT IS THE
RESPONSIBILITY
OF ALL UPL EMPLOYEES
TO ADOPT THE BEST
PRACTICES TO PROMOTE
THE CORRECT USE
OF UPL'S PRODUCTS.



INDIVIDUAL RESPONSIBILITY
OF EVERY EMPLOYEE FOR
SPECIFIC ASPECTS OF
PRODUCT STEWARDSHIP
APPLICABLE TO THEIR
DOMAIN OF WORK.





RESEARCH & DEVELOPMENT

UPL's continuous efforts in research to develop products start right from soil health to seed to plant protection products to nutritional products (natural & chemicals base) to organic and bio-rational solutions and post-harvest solutions focused on improved efficacy and safer toxicological, eco-toxicological and environmental aspects. UPL tests its products thoroughly, in a scientific manner to get the required regulatory authorizations in the country where the product will be marketed for sale and use. UPL adopts a lot of projects in digitalization, artificial intelligence (AI), drones and spatial technologies, mobile phone apps to help its customers and provide value-added service.



MANUFACTURING

UPL ensures all the suitable standards including effluents, water, air and energy management at its production facilities and sites in which the products are being manufactured. For the third party manufacturing, contractual obligations include Product Stewardship compliance so that it should be adhered all the time.



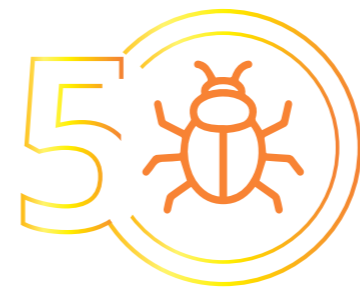
PACKAGING, STORAGE & TRANSPORT

UPL ensures appropriate packaging, storage and transport of its products in accordance with applicable local and international laws.



RESPONSIBLE USE

UPL conducts exhaustive and timely training programmes in order to guide and train its employees, value chain partners and customers for the responsible management of its products during their entire life-cycle.



INTEGRATED CROP PEST MANAGEMENT

New challenges are arising from pest migration due to globalization (e.g., Fall Armyworm in India and Asia). UPL extends its support for the implementation of Integrated Crop Pest Management measures, including the cost-effective programme, like "ProNutiva" for food security, economic sustainability residue management and pest resistance management. UPL has a very strong organic and bio-solution product portfolio to offer its customers and has a dominant position, globally.



CONTAINER MANAGEMENT

UPL actively supports the programme of safe disposal of empty packages and containers.



DISPOSAL OF OBSOLETE STOCK

UPL has policies and procedures in place to ensure safe disposal/incineration of its obsolete stocks of products.

PRINCIPLES AND KEY REQUIREMENTS

PRINCIPLE 1

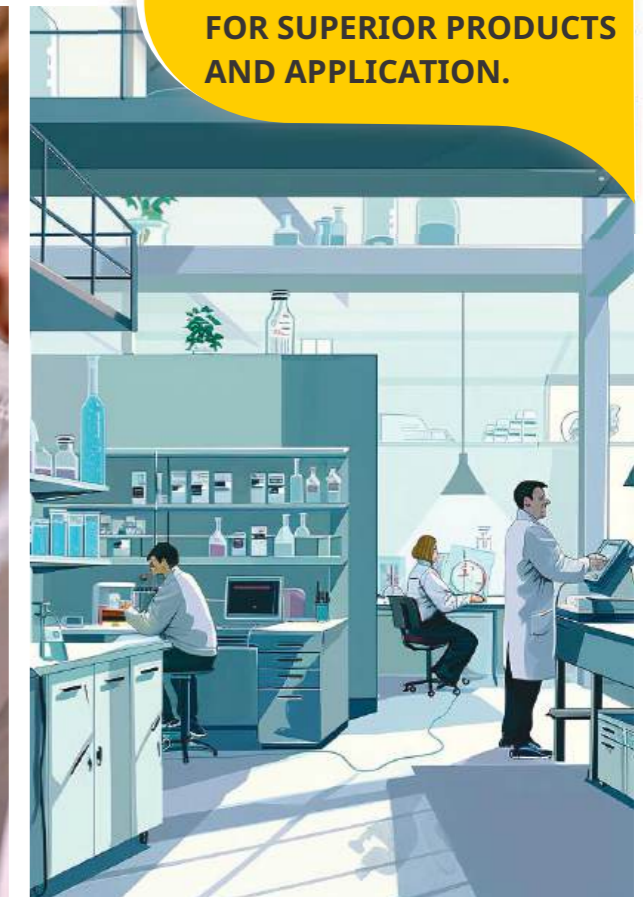


RESEARCH & DEVELOPMENT

UPL's tireless efforts in research to develop products start right from soil health to seed to plant protection products to nutritional products (natural & chemicals base) to organic and bio-rational solutions and post-harvest solutions focused on improved efficacy and safer toxicological, eco-toxicological and environmental aspects. UPL tests its products thoroughly, in a scientific manner to get the required regulatory authorizations in the country where the product will be marketed for sale and use. UPL adopts a lot of projects in digitalization, artificial intelligence (AI), drones and spatial technologies, mobile phone apps to help its customers and provide value-added service.

KEY REQUIREMENTS:

- Priority shall be given to those products the use of which requires readily available and affordable, personal protective gear and application equipment.
- UPL's R&D (Research and Development) team shall make every possible effort to develop new products with improved performance to resolve the farmers pain points.
- UPL's R&D team shall make every possible effort to substitute higher risk-profile formulants and adjuvants with environment-friendly materials.
- UPL shall make every possible effort to develop and support improvement of application technologies and adaptation of best practices with the intention of minimizing operator and environmental exposure.
- UPL units work diligently to minimize the risk of unintended release of any material.



ENGAGE IN RESEARCH AND DEVELOPMENT FOR SUPERIOR PRODUCTS AND APPLICATION.



PRINCIPLE 1



TO ENSURE QUALITY AND GENETIC INTEGRITY. TEST ADEQUATELY AND EFFECTIVELY.



- UPL shall make every possible effort to ensure that every product is adequately tested, using standard scientific procedures and test methods.
- UPL shall make every possible effort to ensure that all required procedures are in place while conducting the tests/trials.
- Experimental product and seed samples shall be labelled properly for safe handling.
- All safety measures shall be followed while handling new products and products with new technologies.
- The R&D of seed technologies, microbial technologies and the application of experimental formulations shall only be done by trained people and where mandatory, country specific import regulations and Experimental Use Permits (EUPs) for non-registered products need to be followed.
- The crops and final produce from trials with non-registered crop protection products shall be destroyed appropriately.

- UPL to develop and submit required regulatory data package to satisfy local and international legal and regulatory requirements before commercialization.
- UPL to ensure that regulatory studies are conducted in countries through high testing standards or as per Good Laboratory Practices and with approved regulatory guidelines such as (GLP) OECD, EPA, CIPAC, etc.
- UPL shall consider the potential impact on global import and export by ensuring that key import country import tolerances or import authorizations are obtained.
- Residue trials for crop protection products shall be conducted for establishing appropriate Maximum Residue Limits (MRL) in accordance with local regulatory requirements.
- The methods for the analysis of any active ingredient or formulation, once validated, as well as the respective analytical standards, shall be made available to the regulatory authorities.
- The methods for analysis used in the testing of microorganisms shall ensure identity and confirm key attributes.
- Analytical standards/samples of UPL molecules/formulations shall be supplied only to third parties conducting relevant R&D, where the content of the activities is known to UPL.

OBTAIN PRODUCT REGISTRATION WHERE THE PRODUCT IS TO BE SOLD.





PRINCIPLE 1

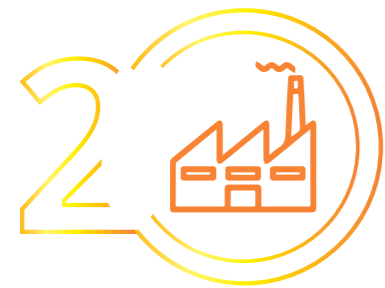
- It shall be ensured that the proposed use patterns, label claims and directions truly reflect the outcome of scientific tests and assessments.
- All product containers and related outer packaging shall be clearly labelled with accurate information in accordance with registered or approved uses.
- Product labels shall comply with local regulatory requirements for classification and labelling.
- In the absence of specific requirements for labelling, crop protection products shall be labelled in accordance with the Global Harmonized Systems Codes (GHS) and the FAO Guidelines.
- Product labels shall be written in an appropriate language understood by the end users.
- Product labels shall include symbols and pictograms.
- The product package shall contain information and instructions in adequate language to ensure effective risk management during handling.
- Information on personal protective gear, symptoms of poisoning, first-aid and medical advice shall be included on the labels.
- Product labels shall include a warning against the inappropriate use of empty containers and instructions on cleaning and safe disposal of empty containers.
- Where appropriate, product labels shall specify a re-entry time for each use.
- Product packaging shall clearly identify each lot or batch of the product to allow traceability and release data (month and year) of the batch or lot for appropriate storage condition in accordance with national labelling rules and requirements.
- Product labels shall clearly show the identity of the registrant. Where required, they shall also carry telephone number in case of an emergency.
- Products sold under specific trademarks shall only contain the active ingredient(s) or variety approved by UPL for use under that name in accordance with normal quality standards.



PROVIDE TRANSPARENT AND ACCURATE INFORMATION TO OUR CUSTOMERS VIA PRODUCT LABELS THAT COMPLIANT WITH LOCAL AND INTERNATIONAL REQUIREMENTS.



PRINCIPLE 2



MANUFACTURING

UPL ensures all the suitable standards including effluents, water, air and energy management at its production facilities and sites in which the products are being manufactured. For the third party manufacturing, contractual obligations include Product Stewardship compliance so that it should be adhered all the time.



**PRODUCTION SITES,
COMPANY-OWNED
OR CONTRACTED, WILL BE
OF A SUITABLE STANDARD.**



KEY REQUIREMENTS:

- Each site/location shall take all necessary precautions to protect workers, bystanders, nearby communities and the environment during its operations.
- Each site/location shall establish and implement an integrated and process-oriented Quality Health Safety and Environment (QHSE) Management System suited to its particular needs and based on the QHSE document.
- UPL shall ensure proper placement of manufacturing and formulation plants, their storage areas and shall monitor and control waste, emissions and effluents in accordance with national regulations, where available, or in accordance with relevant international guidelines.
- Each manufacturing site/location shall adopt engineering standards and operating principles/practices appropriate to the nature of the production.
- A formal hazard identification and risk assessment shall be conducted at the site level for all existing activities, modifications, substances, new processes and projects.
- The processes shall be designed such that potential risks are reduced through the selection of materials and process parameters and the products are handled shall be equipped with up-to-date Safety Data Sheets.
- Knowledge and technology transfer shall be done to all UPL-sites/locations to enable them to develop, implement and improve the Quality Health Safety and Environment system according to UPL Principles and Standards.

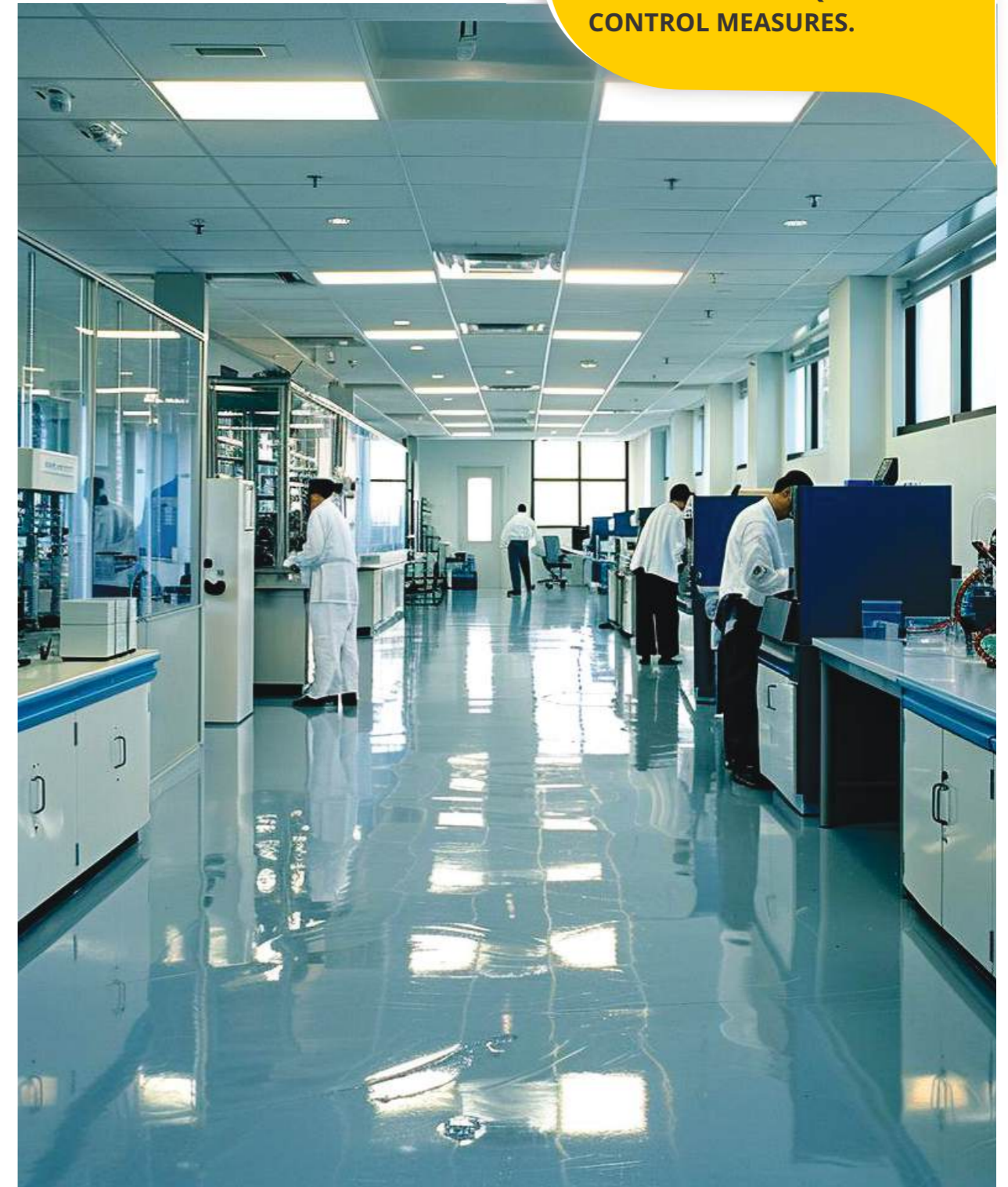
PRINCIPLE 2



- System for checks and balances shall be defined to maintain quality and genetic integrity.
- Product manufacturing shall ensure that the quality of UPL products meets the registered specification. When UPL becomes aware of non-adherence to specifications, then appropriate steps shall be taken.
- Any formal change to materials, process and/or equipment at third parties producing UPL products shall follow a management of change process which is reviewed and approved by UPL prior to implementation.
- Reasonable care shall be taken to ensure that products do not contain residual raw impurities in the form of additional active ingredients, microbial contaminants or any other impurities at levels which will question safety or efficacy, or render the products non-compliant with applicable country laws.
- Chemical and biological seed treatment quality standards shall be defined to ensure that the treated seed conforms to label conditions and the impact, if any, on humans and the environment is minimized.
- Quality control standards shall be available in order to ensure that chemical and biological seed treatment quality standards have been met.
- Seed quality standards shall be defined to ensure that the seed conforms to label conditions.
- Seed produced on behalf of UPL by third parties shall comply with agreed production procedures.
- Product identification and traceability procedures shall be established to allow unique identification of products and raw materials through relevant stages of production, starting with the receipt of raw materials, during production, until storage and delivery.
- Safety Data Sheets shall be provided with product samples when supplied to a third party.
- Changes of packaging specification or new product/package combinations shall be approved by a relevant packaging committee.



ENSURE PRODUCT INTEGRITY THROUGH SOUND QUALITY ASSURANCE AND QUALITY CONTROL MEASURES.



PRINCIPLE 2



SUSTAINABILITY

DJSI World Index

UPL Limited has always been a global leader in agrochemical industry for sustainable products and solutions. We are actively working to reduce our overall environmental impact on the planet and provide a significant positive social return to our stakeholders. Our commitment has helped us to achieve a significant milestone in sustainability space as we have been included in Dow Jones Sustainability Indices (DJSI) World Index.

Member of Dow Jones Sustainability Indices
Powered by the S&P Global CSA

The DJSI World Index comprises global sustainability leaders as identified by S&P Global. It represents the top 10% of the World ESG leader companies based on economic, environmental, and social criteria.

- **First agro-chemical company included in the DJSI World Index.**
- **UPL scored 99 percentile overall and scored 100% in 37 sections of DJSI**

DJSI evaluated UPL's comprehensive sustainability strategy, which encompasses following key areas:

Environmental Stewardship

UPL has invested significantly in developing products and technologies that promote sustainable farming practices. This includes initiatives to reduce greenhouse gas emissions, improve water management, reduce waste disposal, and protect biodiversity.

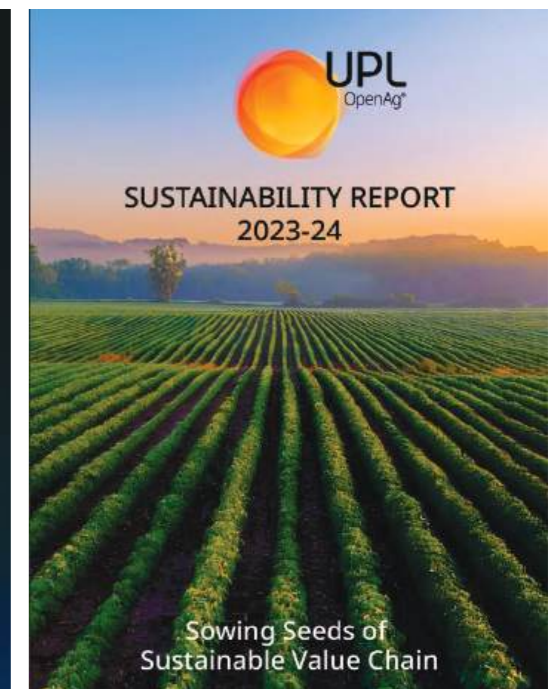
Social Responsibility

The company is dedicated to fostering inclusive growth amongst the employees and within communities where it operates. UPL's programs aim to empower farmers through education, training, and access to resources, thereby enhancing livelihoods and promoting food security.

Governance

UPL upholds rigorous standards of corporate governance, transparency, and ethical business practices. The company's leadership team is committed to maintaining high levels of integrity and accountability in all operations.

The inclusion in the DJSI World Index reflects UPL's continuous efforts to integrate sustainability into its core business strategy. By adhering to globally recognized benchmarks for sustainability performance, UPL not only enhances its reputation but also attracts environmentally conscious investors who prioritize long-term value creation.





UPL'S SUSTAINABILITY PERFORMANCE

Sustainability Performance Highlights

Environment



47% ↓

Reduction in **water** consumption intensity* from baseline FY2020



52% ↓

Reduction in **waste** disposal intensity* from baseline FY2020



34% ↓

Reduction in **carbon** emission intensity* from baseline FY2020

51%

Electric power from renewable sources at our two largest manufacturing plants



Endorsed CEO water mandate



UPL listed in
DJSI world Index



UPL Listed in
CDP supplier engagement leader board



Committed for ten principles of the UNGC



WBCSD wastewater zero commitment

Social



4.17 lakh+ ↑

mangroves saplings have been planted spread across 200 acres



1.75 million ↑

lives positively impacted



12000+

Employees



186908

Manhours of safety trainings provided to employees



30 ↑

R&D facilities



3%

Annual revenue reinvested in R&D

Governance



#1

Bio solutions company



#5

Agrochemical company in the world



In-house Sustainability Data Tracker

Implemented powered by **artificial intelligence** and **data science**.



80%

Suppliers covered under UPL sustainable procurement program



36%

Revenue from differentiated and sustainable solutions



15000+

Products registered

*intensity is measured in unit per MT of production

PRINCIPLE 3



PACKAGING, STORAGE & TRANSPORT

UPL ensures appropriate packaging, storage and transportation of its products in accordance with applicable local and international laws.



KEY REQUIREMENTS:

- UPL shall only use containers approved for use for transportation, in compliance with the requirements of the rules on the transportation of dangerous goods.
- UPL products shall not be transported in the same container or compartment as food, drugs, toys, clothing, cosmetics or household goods. Also seed and crop protection products needs to be stored and transported separately.
- UPL shall promote the implementation of measures to ensure suitability of vehicles and the safe stowage and securing of the load.
- The development and the use of packaging materials for purchased goods, intermediates and finished products shall take the required Quality, Health, Safety and Environment (QHSE) aspects into consideration;
- UPL shall provide a reasonable range of pack sizes and types that are appropriate to the needs of customers, especially small-scale farmers, in order to reduce risks and avoid unsupported repacking by sellers.
- UPL shall only supply products of adequate quality, packed and labelled as appropriate for each specific market.

PRINCIPLE 4



RESPONSIBLE USE

UPL conducts exhaustive and timely training programmes in order to guide and train its employees and customers for the responsible management of its products during their entire life-cycle.



WE AT UPL IMPLEMENT TRAINING PROGRAMS FOR UPL EMPLOYEES AND CUSTOMERS.

KEY REQUIREMENTS:

- The occurrence of any problem arising from the use of the products shall be appropriately reported and actively dealt with to determine the cause and remedial measures.
- Learnings from failure shall be registered as part of the continuous improvement process
- UPL shall support responsible use of its products through implementation of appropriate training measures, on a mandatory basis.
- Training programmes shall focus on the requirement of the product, for which UPL shall share adequate information on the following aspects:
 - Hazard and risks
 - Recognition of the symptoms of poisoning, first -aid, antidote or medical advice and emergency action
 - Use of recommended personal protective gear and clothing
 - Clean-up procedure of product spills
 - Personal hygiene
 - Risks associated with the handling and use of counterfeit and/or illegal products. How to distinguish counterfeit and illegal products
 - The right way to prepare product solution for use (mixing and loading procedure).
 - Recommended application techniques
 - Safe handling and application of products shall be actively promoted through the best management practices
 - Calibration, use, cleaning, and maintenance of equipment
 - The right way of cleaning empty containers and the proper way of disposal of waste products and empty and cleaned containers
 - Mitigation measures against any kind of problems arising during product uses
 - Safe handling and application of products shall be actively promoted through the best management practices

PRINCIPLE 4



- When made aware of an unapproved use or misuse, the issue shall be promptly addressed and reported to the respective functional heads so that corrective steps can be taken.
- UPL shall provide complete support for the detection, control, prevention, production, transportation, trade and use of counterfeit and/or illegal products.
- UPL shall take all precautionary measures to prevent any untoward incident. If the mishap occurs nonetheless, the country's organization shall investigate and report to the headquarters.
- Reported incidents shall be managed in a timely manner to ensure that the impact to the company and stakeholder is minimized. Additional remedial measures shall be implemented to mitigate recurrence.
- The country's organization shall inform and co-operate with the national authorities to enable prompt remedial action
- Updated Safety Data Sheets (SDS) for products shall be provided in an appropriate language to the required stakeholders. This applies to all UPL crop protection products sold by or on behalf of UPL.

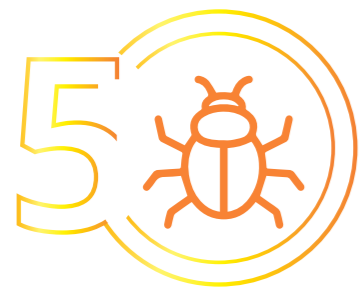
WE AT UPL DO NOT SUPPORT, ENCOURAGE OR TOLERATE ANY UNAPPROVED USE OF OUR PRODUCTS.



TAKE ALL POSSIBLE MEASURES TO PREVENT AND MANAGE ANY UNTOWARD INCIDENT.



PRINCIPLE 5



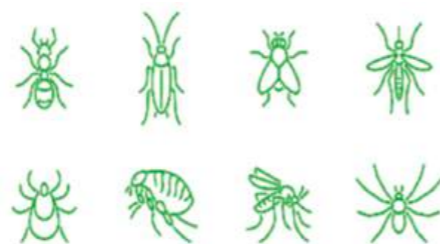
INTEGRATED CROP PEST MANAGEMENT

New challenges are arising from pest migration due to globalization (e.g., Fall Armyworm in India and Asia). UPL extends its support for the implementation of Integrated Crop Pest Management measures, including the cost-effective programme, like "ProNutiva" for food security, economic sustainability and residue management and resistance management.



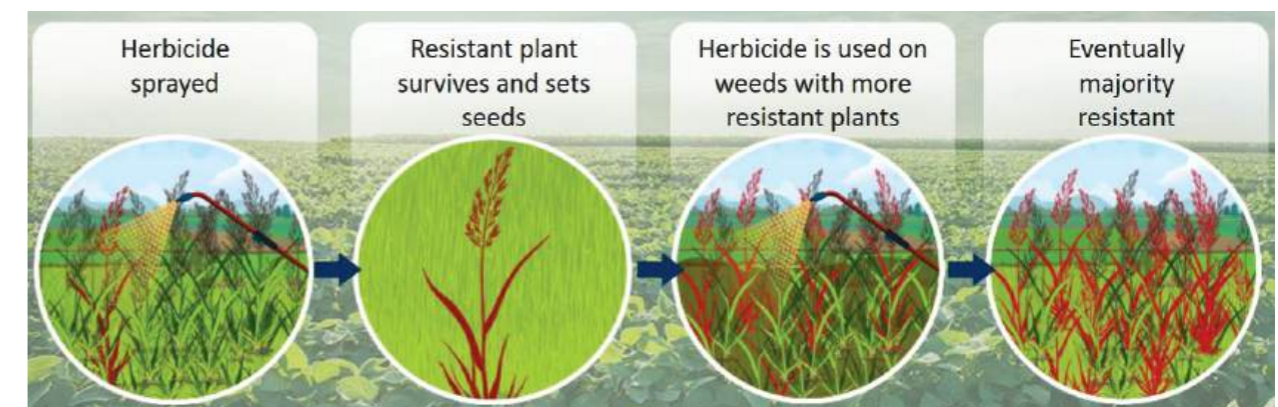
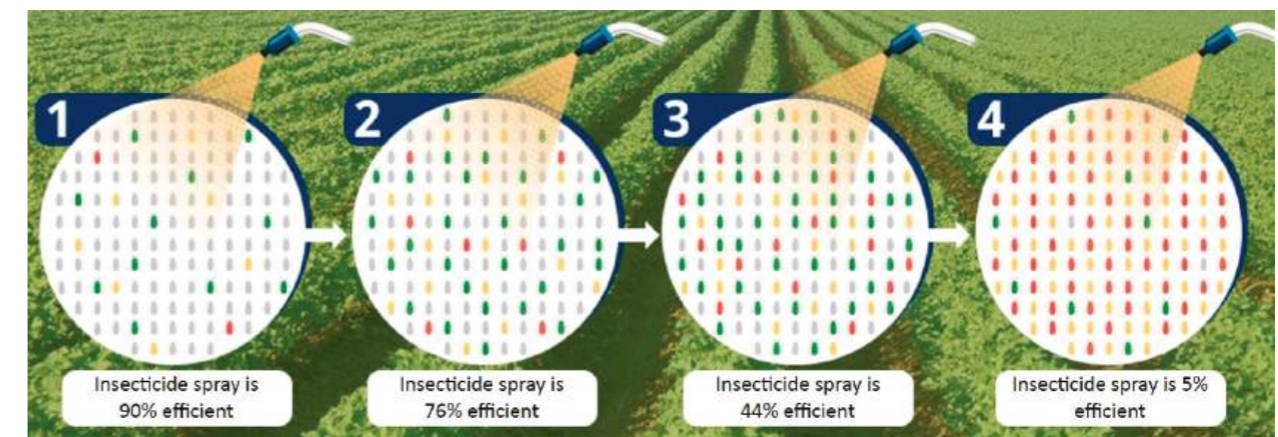
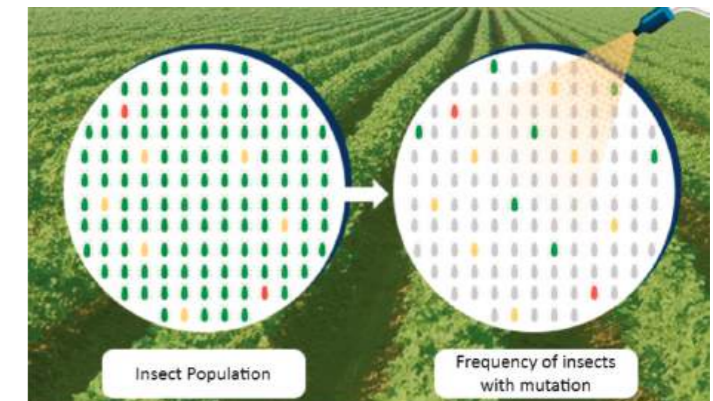
ProNutiva Drivers:

- Increase grower profitability *via* yield/quality increases:
= **BioStimulants/Innovative Nutrition**
- Ag sustainability/enhanced protection:
= **BioControl**

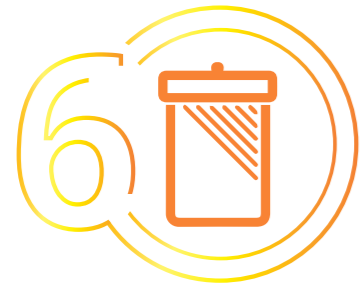


KEY REQUIREMENTS:

- UPL shall develop and promote Integrated Crop Pest Management solutions.
- UPL shall develop, communicate and implement resistance management guidance to avoid pest resistance and prolong the effectiveness of its products.
- Whenever needed training shall include pest resistance management strategies, biological control and Integrated Crop Pest Management strategies.



PRINCIPLE 6



CONTAINER MANAGEMENT

UPL actively supports the programme of safe disposal of empty packages and containers.

Collection



Temporary storage of packaging and waste



Waste press and crushing



KEY REQUIREMENTS:

- UPL shall ensure that the container design shall support the safe disposal in accordance with local and international laws.
- UPL shall ensure for all plant protection products that empty product containers are to be treated by applying the triple rinse cleaning procedure before disposal.
- UPL shall promote container re-cycling/disposal program as per local laws.

Palletizing and stretch



Triple package washing



Loading of packaging and waste



Packaging recovery



PRINCIPLE 7



DISPOSAL OF OBSOLETE STOCK

UPL has policies and procedures in place to ensure safe disposal/incineration of its obsolete stocks of products.



KEY REQUIREMENTS:

- UPL pioneered the initiative to install the first incinerator and also is the first to have landfills to treat and dispose of waste appropriately.
- UPL shall comply with and ensure that required regulatory permits, conditions, and/or approvals are maintained throughout the discontinuation phase.
- UPL shall comply with inventory management and dispose of obsolete internal materials.

ENSURE SAFE DISPOSAL OF OBSOLETE STOCK AND WASTE



KEY CONTACT

PRODUCT STEWARDSHIP

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