



Responsible Artificial Intelligence Program

UPL is committed to harnessing Artificial Intelligence (AI) responsibly to drive innovation, operational efficiency, and sustainable growth. We ensure that all AI systems are designed, developed, and deployed in a manner that is ethical, secure, transparent, and compliant with global regulatory expectations.

This program builds on UPL's enterprise AI Policy and Governance Framework, which establishes a structured approach for managing AI across its lifecycle.

Scope

This program applies to:

- All UPL Group entities, affiliates, and subsidiaries
- Employees, contractors, and third-party partners
- All AI systems across the irrespective of the lifecycle stage

Responsible AI Principles

UPL adheres to globally recognized Responsible AI principles:

1. Ethical & Fair Use

AI systems are responsibly developed and used to reduce bias, prevent discrimination, and safeguard individuals and communities from unintended harm.

2. Transparency & Explainability

We promote transparency by enabling clear understanding of AI outcomes and decision-making processes.

3. Privacy & Data Protection

UPL embeds privacy-by-design practices, ensuring protection of personal and sensitive data throughout the AI lifecycle.

4. Accountability & Human Oversight

Human accountability is maintained across all AI-driven decisions, with appropriate review and escalation mechanisms.

5. Security & Resilience

AI systems are secured against threats and misuse through robust cybersecurity controls and continuous monitoring.

6. Compliance & Responsible Innovation

AI usage aligns with applicable laws, regulations, and UPL's corporate values to enable safe and responsible innovation.

Governance & Oversight

1. AI Governance Structure

UPL has established a cross-functional AI Governance Committee comprising leadership from technology, security, legal, and other relevant business functions. The committee:

- Oversees AI strategy, risks, and policy compliance
- Reviews AI use cases and associated risks
- Ensures adherence to ethical and regulatory requirements

2. Roles & Responsibilities

- Leadership provides strategic direction and oversight
- Cybersecurity and Information Security Governance functions ensure robust risk management, implementation of effective controls, and adherence to regulatory and compliance requirements
- Business units and individual users are responsible for accountable use of AI solutions

3. AI Risk Management

UPL adopts a risk-based approach to AI governance:

- Identification of risks including bias, privacy, security, and regulatory risks
- Assessment of AI systems during design and deployment stages
- Implementation of technical and organizational controls
- Continuous monitoring of model performance and associated risks.

AI risks are integrated into the broader enterprise risk management processes to ensure consistent oversight

4. Responsible AI Lifecycle Management

UPL enforces governance across all stages of AI lifecycle:

Stage	Key Practices
Design	Define purpose, assess risk, engage stakeholders
Data	Ensure quality, fairness, and privacy protection
Development	Validate models, implement secure practices
Deployment	Governance approvals and compliance checks
Monitoring	Continuous review for bias, performance, and risks

This lifecycle-driven approach ensures AI systems are trustworthy, safe, and aligned with business objectives.

5. Third-Party and Supply Chain Responsibility

UPL extends Responsible AI principles to its ecosystem:

- Third-party AI solutions are assessed for risk and compliance
- Vendor agreements include data protection and responsible use expectations
- Continuous monitoring ensures adherence across the supply chain

6. Transparency & Stakeholder Trust

UPL is committed to enhancing transparency by:

- Maintaining visibility of AI use cases across the enterprise
- Providing governance disclosures aligned with regulatory expectations
- Monitoring adherence to AI policies and controls

7. Awareness & Capability Building

UPL promotes responsible AI adoption through:

- Training and awareness programs for employees
- Cross-functional collaboration across legal, technology, and business teams
- Embedding responsible AI practices into day-to-day operations

8. Continuous Improvement

UPL continually enhances its Responsible AI Program through:

- Periodic policy reviews and governance updates
- Alignment with evolving global standards and best practices
- Lessons learned from industry developments and internal assessments

9. Delivering Sustainable Value

Through this Responsible AI Program, UPL aims to:

- Strengthen trust among customers, partners, and stakeholders
- Ensure ethical and responsible use of emerging technologies
- Enhance resilience against AI-related risks
- Support long-term sustainable and responsible innovation

UPL recognizes that AI is a transformative capability. By embedding strong governance, ethical principles, and risk management practices, UPL ensures that AI contributes positively to business outcomes while upholding its commitment to responsibility, sustainability, and societal impact.



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