



stewardship

PRODUCT STEWARDSHIP

POLICY AND KEY REQUIREMENT

VERSION 02 - JANUARY 2021



CONTENT

Introduction

01

Policy

03

Implementation

05

Outline of the
Key Principles

07

Principles and
Key Requirements

09

Key Contacts

33

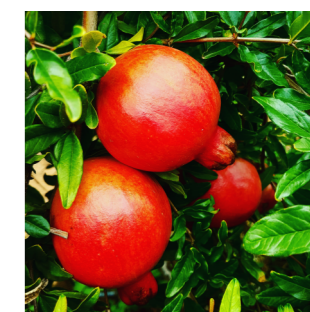
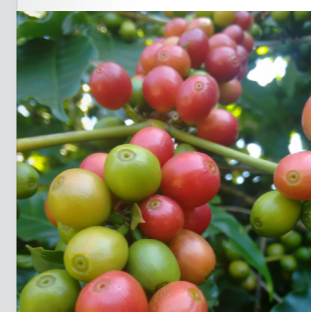
INTRODUCTION

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 like 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, development, registration, manufacturing, packaging, labelling, branding, sales, distribution, safe-handling, application, storage and transportation and finally, the adaptation of empty product containers and the disposal of product and waste.
- The UPL Product Stewardship exercises considerable interest in testing the quality of its products; the improvement of advances for improved seed varieties, the development of crop solutions for Integrated Pest Management and Resistance Management, encompassing the development of proper packaging solutions and crop production techniques.
- This UPL Product Stewardship Policy and its key requirements document is intended to support all UPL employees who must ensure the responsible 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.





POLICY

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

- UPL goes by the product life-cycle approach to stewardship in individual countries encompassing the following areas:
 - Research
 - Development
 - Registration
 - Plant breeding
 - Manufacturing
 - Packaging
 - Labelling
 - Storage
 - Transportation
 - Distribution
 - Marketing
 - Branding
 - Sales
 - Empty Container Management
 - Management of Obsolete Stocks
- The prevention of production, export and import, any kind of transport, distribution and sale of illegal or counterfeit products.
- Manufacturing products in compliance with UPL's safety guidelines, adhering to local rules and regulations.
- The maintenance of high quality products comes through our quality assurance and quality control at each 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.



Vikram Shroff - Executive Director

IMPLEMENTATION



OUTLINE



RESEARCH & DEVELOPMENT

UPL's tireless efforts in research to develop products start right from soil health to seed to plant protection chemicals to nutritional products (with 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 product regulatory authorizations in the country where the product is being marketed for sale and use. UPL adopts several projects in digitalization, artificial intelligence (AI), drones and spatial technologies, mobile phone apps to help its customers and provide value-added service to the environment, too.



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 parties associated with UPL's business, agreements are executed to ensure stewardship compliance at par with UPL's standards.



PACKAGING, STORAGE, TRANSPORTATION & DISTRIBUTION

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



RESPONSIBLE USE

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



INTEGRATED CROP PEST MANAGEMENT

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. UPL has a very strong organic and bio-solution product portfolio to offer its customers.



CONTAINER MANAGEMENT

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



DISPOSAL OF OBSOLETE STOCK

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

PRINCIPLES AND KEY REQUIREMENT

PRINCIPLE 1



RESEARCH & DEVELOPMENT

UPL's tireless efforts in research to develop products start right from soil health to seed to plant protection chemicals to nutritional products (with 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 product regulatory authorizations in the country where the product is being marketed for sale and use. UPL adopts several projects in digitalization, artificial intelligence (AI), drones and spatial technologies, mobile phone apps to help its customers and provide value-added service to the environment, too.

KEY REQUIREMENT:

- UPL's R&D (Research and Development) team to prioritise the development of new products with improved performance.
- UPL's R&D team works diligently towards substituting higher risk-profile formulants/adjuvants with environment-friendly materials.
- UPL works diligently to develop and support improvement of application technologies and adaptation of best practices with the intention of minimizing operator and environmental exposure.
- UPL's seed unit works diligently to minimize the risk of unintended release of any material.



INDIA

PRINCIPLE 1



- UPL ensures that every product is adequately tested, using standard procedures and test methods.
- Experimental product samples/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) 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 relevant 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 OECD, EPA, CIPAC, etc.

- Residual trials for crop protection products shall be conducted for establishing appropriate Maximum Residue Limits (MRL) in accordance with national 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.



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.
- Subject to applicable laws, product labels shall be written in an appropriate language understood by the end users.
- Product labels shall include symbols and pictograms, if appropriate.
- 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.
- 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 also release data (month and year) of the batch or lot for appropriate storage condition in accordance with the relevant 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.

MEXICO



INDIA



ARGENTINA



BRAZIL

PROVIDE
TRANSPARENT
AND ACCURATE
INFORMATION TO OUR
CUSTOMERS VIA PRODUCT
LABELS THAT
COMPLIANT WITH
RELEVANT
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 parties associated with UPL's business, agreements are executed to ensure stewardship compliance at par with UPL's standards.



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

KEY REQUIREMENT:

- Each site/location shall take all necessary precautions to protect workers, nearby communities and the environment during its operations.
- Each site/location shall establish and implement process-oriented Quality Health Safety and Environment (QHSE) Management System.
- 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.
- Each manufacturing site/location shall adopt engineering standards and operating principles/practices appropriate to the nature of the production.
- 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

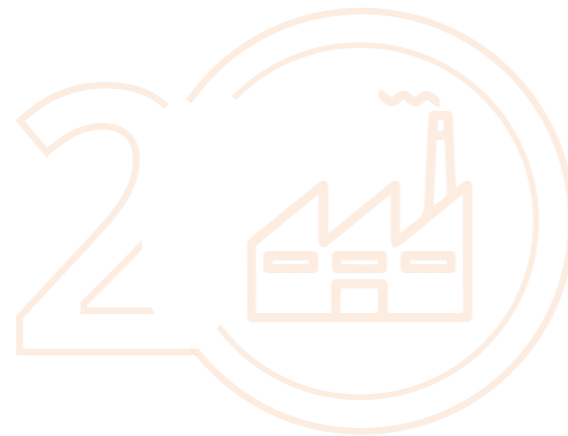


- Product manufacturing shall ensure that the quality of UPL products meets the registered specification.
- Reasonable care shall be taken to ensure that products do not contain residual raw impurities in the form of additional active ingredients, microbial contaminants or any other impurities at levels which will question safety or efficacy, or render the products non-compliant with applicable country laws.
- 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.
- 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



ENVIRONMENTAL SUSTAINABILITY

TRIPLE-BOTTOMLINE APPROACH INCLUDED IN OUR STRATEGY.

ENVIRONMENT

- ENVIRONMENTAL MANAGEMENT
- OPERATIONAL EFFICIENCY
- ENERGY, WATER & WASTE

ECONOMIC

- CORPORATE GOVERNANCE
- FINANCIAL RESULTS
- CUSTOMER CARE

SOCIAL

- HR
- SAFETY
- SDGS

WE HAVE DEDICATED TEAM CALLED "GREEN CELL" TO REDUCE OUR ENVIRONMENT FOOTPRINT AND INCREASE THE EFFICIENCY OF ENVIRONMENT MANAGEMENT SYSTEM.



PUBLISH SUSTAINABILITY REPORT ANNUALLY AS PER GRI STANDARDS ON COMPANY WEBSITE.



UPL IS RATED BY DOW JONES SUSTAINABILITY INDEX (DJSI) AND FTSE RUSSELL ESG RATING WITH ABOVE INDUSTRY AVERAGE SCORE YEAR-OVER-YEAR



AT UPL, WE ADOPTED STRUCTURED APPROACH TOWARDS SUSTAINABILITY

MEMBERSHIP



UPL'S ENVIRONMENTAL INITIATIVES

1. Company have dedicated team called Green Cell and Energy Cell to reduce environmental footprint of operation.
2. Our 60% global plants have Zero Liquid Discharge (ZLD) system
3. Implemented latest technology for enhancing wastewater treatment quality like Reverse Osmosis, Forwards Osmosis, MBBR, Volute dewater press, scaleban.
4. Rain Water harvesting system in our major manufacturing sites
5. Purchase of 25 MW renewable electricity (Solar and Wind) through purchase power agreement (PPA) in our major 2 manufacturing plant.
6. Convert by-products into value-added product by recovery and purification.
7. Signed MOU's with cement industries for co-processing of incinerable waste at major Indian plants.



PRINCIPLE 3



PACKAGING, STORAGE, TRANSPORTATION & DISTRIBUTION

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



KEY REQUIREMENT:

- UPL shall only use containers approved for use for transportation, in compliance with the requirements of the relevant rules on the transportation of dangerous goods.
- Unless as otherwise permitted under the relevant laws, UPL products shall not be transported in the same container or compartment as food, medicines, toys, clothing, cosmetics or household goods. Also seed and crop protection products needs to be stored and transported separately.
- Unless as otherwise permitted under the relevant laws, UPL shall promote the implementation of measures to ensure suitability of vehicles and the safe stowage and securing of the load.
- The development and 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 training programmes in order to guide and train its employees and customers for the responsible management of its products during their entire life-cycle.



INDIA



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



AFRICA



EUROPE



MIDDLE EAST



USA

KEY REQUIREMENT:

- The occurrence of any problem arising from the use of the products shall be actively dealt with to determine the cause and remedial measures.
- UPL shall support responsible use of its products through implementation of appropriate training measures.
- Training programmes shall focus on the requirement of the product, for which UPL shall share adequate information on the following aspects:
 - Hazard and risks
 - First-aid
 - 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
- Use, cleaning, and maintenance of equipment
- The right way of cleaning empty containers and the proper way of disposal of waste products and empty containers
- Safe handling and application of products shall be actively promoted through the best management practices

PRINCIPLE 4

- UPL shall provide support for the detection, control, prevention, production, transportation, trade and use of counterfeit and/or illegal products.
- Reported incidents shall be managed in a timely manner to ensure that the impact to the company and stakeholder is minimized.
- 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.



INDIA



BRAZIL



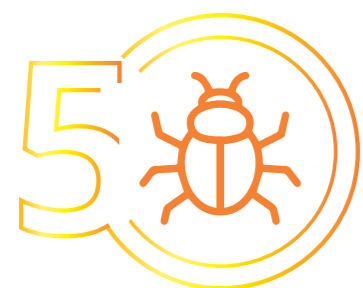
TAKE ALL
POSSIBLE
MEASURES
TO PREVENT AND
MANAGE ANY
INCIDENT.



MIDDLE EAST



PRINCIPLE 5



INTEGRATED CROP PEST MANAGEMENT

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. UPL has a very strong organic and bio-solution product portfolio to offer its customers.



ProNutiva Drivers:

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



KEY REQUIREMENT:

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



KEY REQUIREMENT:

- UPL shall ensure that the container design shall support the safe disposal in accordance with relevant laws.
- UPL shall ensure for all plant protection products that empty product containers are to be treated by applying the triple rinse cleaning procedure.
- UPL shall support container re-cycling program, wherever required.

Palletizing and stretch



Triple package washing



Loading of packaging and waste



Packaging recovery



PRINCIPLE 7

7 DISPOSAL OF OBSOLETE STOCK

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



KEY REQUIREMENT:

- UPL had pioneered the initiative in India to instal 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.
- UPL shall comply with inventory management and dispose of excess and obsolete internal materials.



KEY CONTACTS

PRODUCT STEWARDSHIP & COMPLIANCE (CROP PROTECTION)

Name : Govind Sawant
E-mail : stewardship@upl-ltd.com

PRODUCT STEWARDSHIP & COMPLIANCE (SEEDS)

Name : Benjamin Marolda
E-mail : stewardship@advantaseeds.com







UPL Limited,
UPL House, 610 B/2,
Bandra Village, Off Western Express Highway,
Bandra-East, Mumbai 400 051, India.