



# PRODUCT STEWARDSHIP

POLICY AND KEY REQUIREMENT

JANUARY 2020





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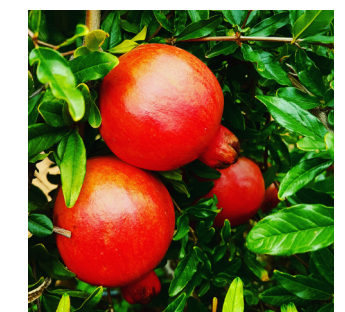
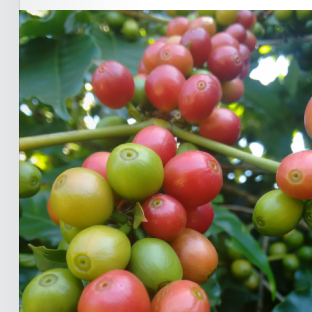
# INTRODUCTION

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 varieties, development of crop solutions for Integrated 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 Policy 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.







## POLICY

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."

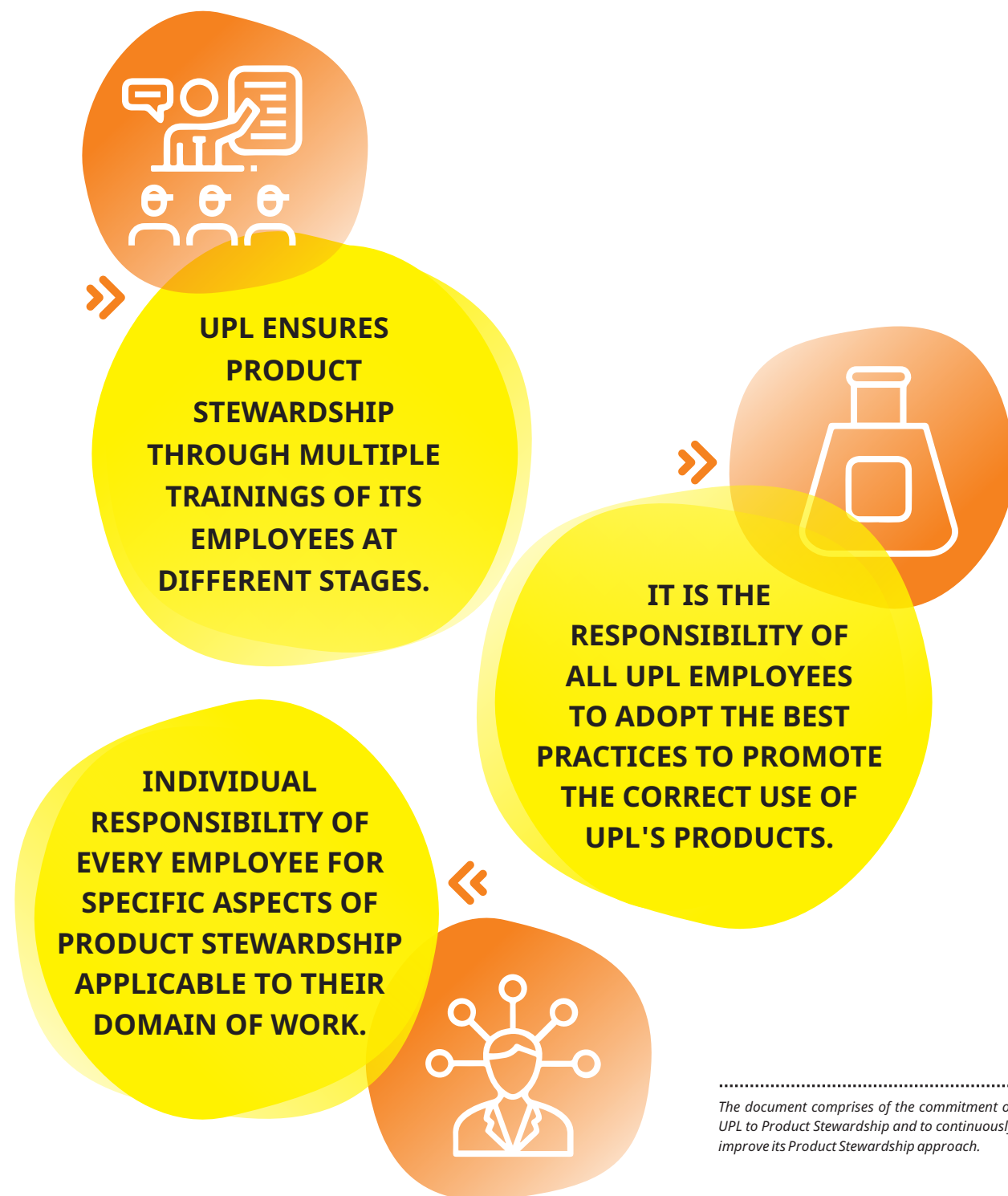
- UPL goes by the product life-cycle approach ensuring that a stewardship programme is in compliance with relevant legislation and regulation in individual countries encompassing the following areas:
  - Research and Development
  - Registration
  - Plant Breeding
  - Manufacturing
  - Packaging
  - 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 - Executive Director**



# IMPLEMENTATION





# OUTLINE



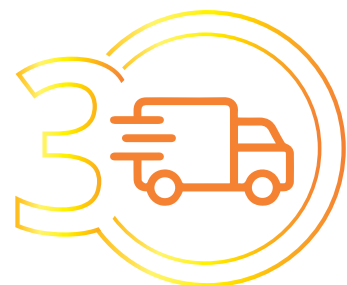
## RESEARCH & DEVELOPMENT

UPL's tireless efforts in research to develop products start right from soil health to seed to plant protection chemicals to nutritional products (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, from start to finish in a scientific manner to get product regulatory authorizations in the country where the product is being marketed and used. 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.



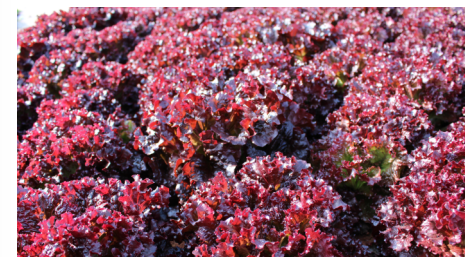
## MANUFACTURING

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 and customers for the responsible management of its products during their entire life-cycle.



## CONTAINER MANAGEMENT

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



## 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. UPL has a very strong organic and bio-solution product portfolio to offer its customers and has a dominant position, globally.



## 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 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 (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, from start to finish in a scientific manner to get product regulatory authorizations in the country where the product is being marketed and used. 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 REQUIREMENT:

- 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.
- UPL's R&D team shall make every possible effort to substitute higher risk-profile formulants/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's seed unit shall make every possible effort to minimize the risk of unintended release of any material.



INDIA





## PRINCIPLE 1



- 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 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) 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 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.
- Residual 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.





## 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, 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.
- 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 also 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.

MEXICO



INDIA



ARGENTINA



BRAZIL



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





## PRINCIPLE 2

# 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.



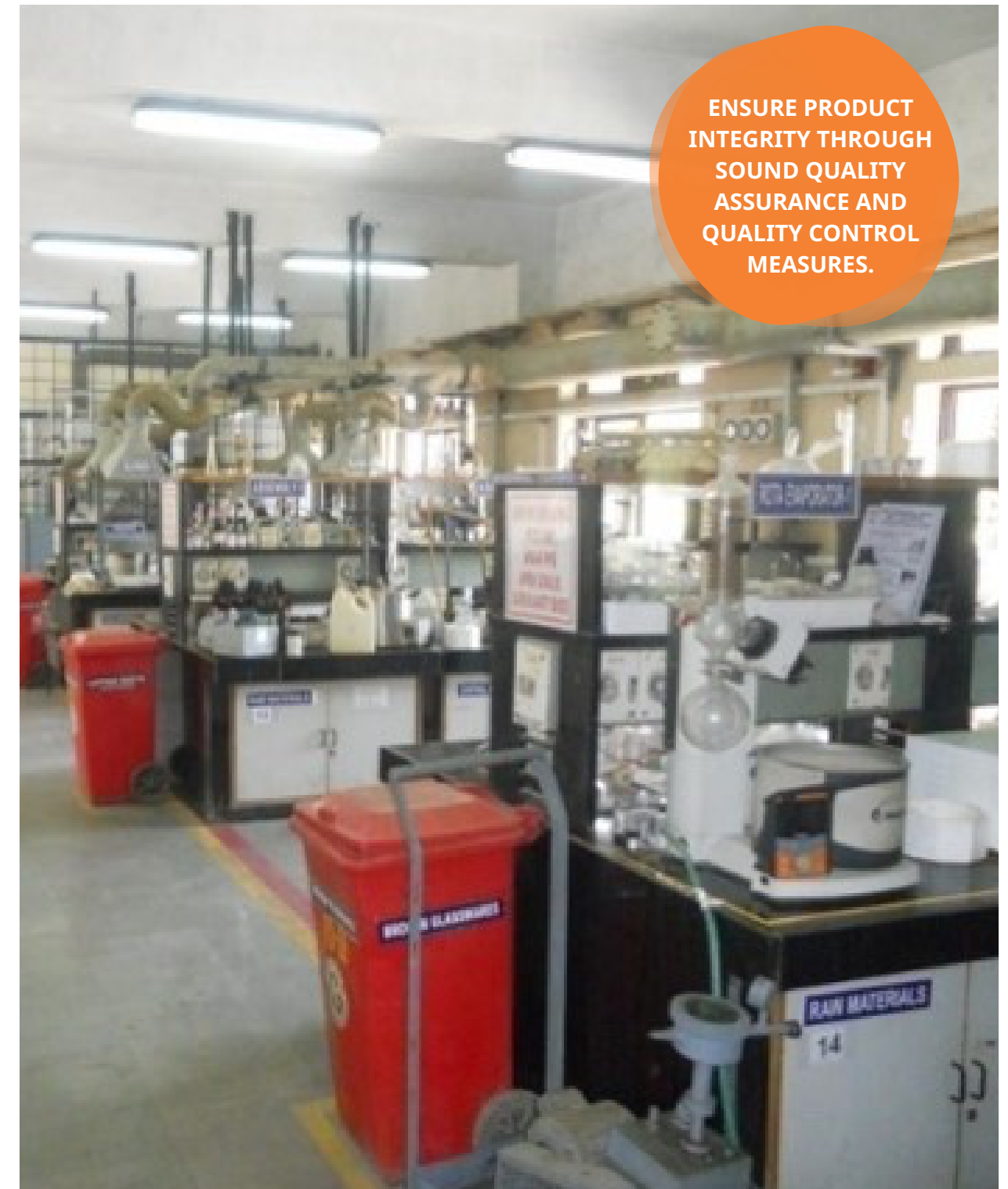
### KEY REQUIREMENT:

- 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

### ENVIRONMENTAL SUSTAINABILITY

TRIPLE-BOTTOMLINE APPROACH INCLUDED IN OUR STRATEGY.

#### ENVIRONMENT

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

#### ECONOMIC

- CORPORATE GOVERNANCE
- FINANCIAL RESULTS
- CUSTOMER CARE

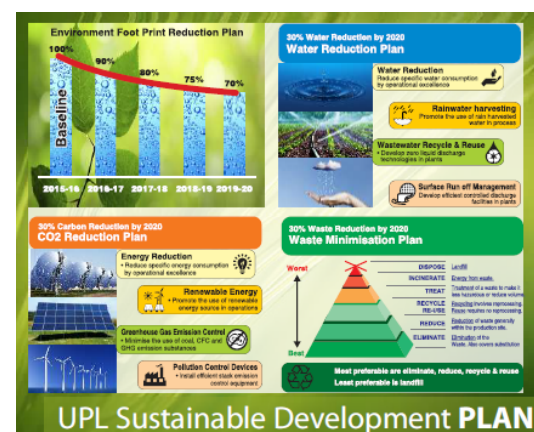
#### SOCIAL

- HR
- SAFETY
- UN-SDGs

LAUNCHED UPL SUSTAINABLE DEVELOPMENT PLAN TO REDUCE 30% ENVIRONMENT FOOTPRINT BY 2020.

PUBLISHED SECOND SUSTAINABILITY REPORT 2017-18.

57% DJSI SCORE & 70% FTSE SCORE HAS IMPROVED IN 2018-19.



Dow Jones Sustainability Indexes

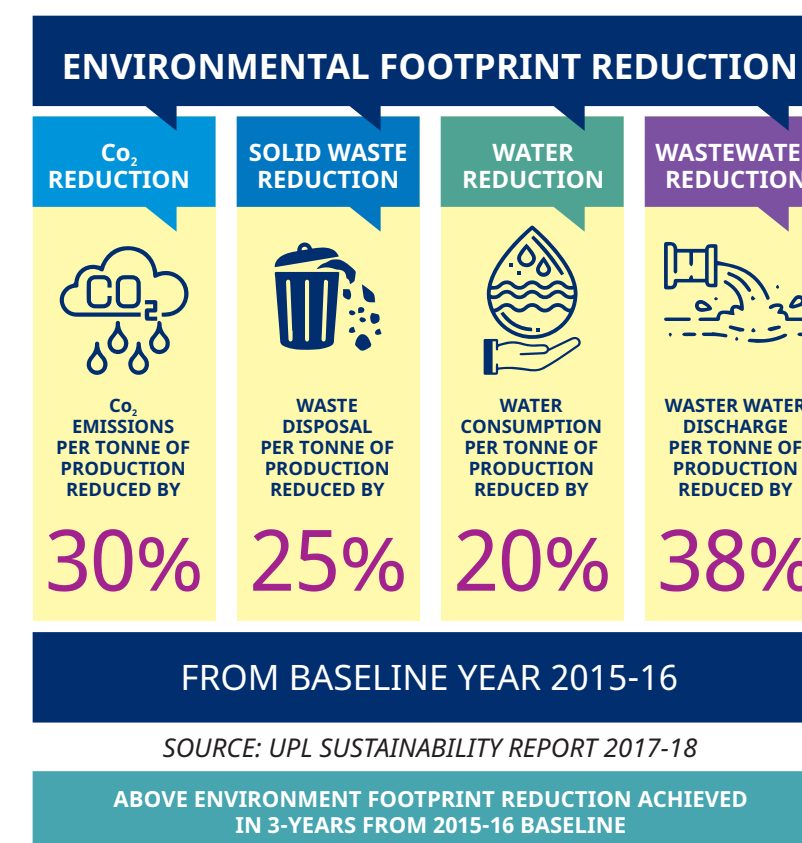
FTSE Russell

### AT UPL, WE ADOPTED STRUCTURED APPROACH TOWARDS SUSTAINABILITY

MEMBERSHIP



### UPL'S SUSTAINABILITY PERFORMANCE



FTSE Russell

OUR FTSE SCORE IN 2018 HAS IMPROVED 70% FROM 2017 SCORE



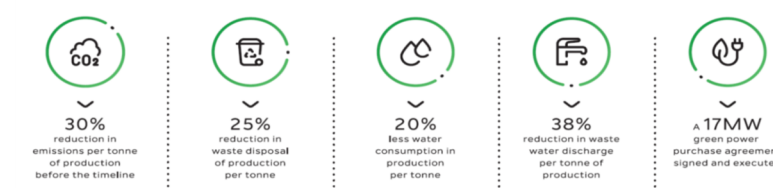
Dow Jones Sustainability Indexes

OUR DJSI SCORE IN 2018 HAS IMPROVED 57% FROM 2017 SCORE

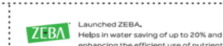
RECENTLY WE HAVE SUBMITTED MORE THAN 500 PAGES DJSI & FTSE QUESTIONNAIRE DOCUMENTS RELATED TO OUR SUSTAINABILITY PERFORMANCE

### FOR US THE COMMITMENT TO OUR DEADLINE WAS YESTERDAY.

That's why we surpassed our commitment of 30% lower emissions, way before our 2020 target.



UPL proudly celebrates this World Environment Day with you.



### OUR STRUCTURED APPROACH TOWARDS SUSTAINABILITY HAS IMPROVED UPL'S INTERNATIONAL SUSTAINABILITY RATING



## PRINCIPLE 3



### PACKAGING, STORAGE & TRANSPORT

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



#### KEY REQUIREMENT:

- 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.

INDIA



AFRICA



EUROPE



MIDDLE EAST



USA

#### KEY REQUIREMENT:

- 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.
- 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
- 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.

INDIA



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

BRAZIL



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



MIDDLE EAST





## PRINCIPLE 5



### 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 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 6



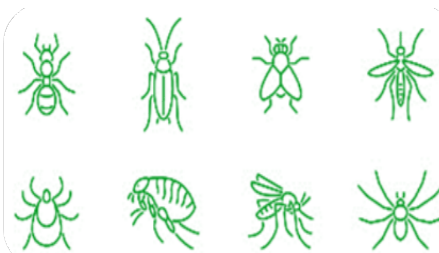
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#### ProNutiva Drivers:

- 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.
- 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 7



### DISPOSAL OF OBSOLETE STOCK

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



#### KEY REQUIREMENT:

- 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 CONTACTS

### PRODUCT STEWARDSHIP & COMPLIANCE (CROP PROTECTION)

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

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### 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.