



UPL's Human Rights Policy

Contents

Foreword.....	2
Introduction.....	3
Scope.....	3
Our Objective.....	3
Our Approach.....	4
- Prohibition of Child Labor and Protection of Labor Rights	
- Diversity and Non-discrimination	
- Freedom of Association	
- Safety	
- Employee Benefits	
Our Compliance Program.....	6
- Legal Compliance	
- Trainings	
- Grievance Redressal	
Administering the Policy.....	7

Foreword

UPL values are steered by international human rights principles including the Universal Declaration of Human Rights which provides that, “all human beings are born free and equal in dignity and rights”. UPL has a proud history of espousing human rights and we continuously strive to increase the understanding of human rights principles and this policy, among our employees and communities.

UPL recognizes its responsibility toward human rights and works diligently to demonstrate its commitment, in the course of conducting its day to day business. We believe that doing this is fundamental to our long-term success and that of the communities where we live and work.

We acknowledge that violation of human rights has an adverse impact, both, within and outside, UPL’s operational boundaries.

In order to respect and comply with principles of human rights, we have developed robust policies and protocols by integrating our experience with the expertise, passion and knowledge of our stakeholders.

Introduction

Human rights are standards that allow all people to live with dignity, freedom, equality, justice and peace.

At UPL, we are committed to developing an organizational culture which supports and recognizes human rights and seeks to avoid complicity in human rights abuses. We are committed to identifying, preventing and mitigating adverse human rights issues resulting from or caused by our business activities.

We recognize this as our responsibility which goes beyond just a legal obligation.

Scope

This Human Rights Policy applies to all entities of the UPL Group and stakeholders that engage with UPL for their business operations. Accordingly, the policy is to be adhered not only by our employees but also our customers, contractors, suppliers and all other third-party business associates.

Our Objective

The objective of this Policy is to provide an overview of our commitment towards human rights to all our stakeholders, as well as define the expectations we have from our employees and third-party associates who collaborate with us.

By compliance with this Policy, we aim to minimize any risks of human rights violations that may arise due to our large-scale operations which are spread across various geographies and collaborations with multiple third-party associates. To mitigate violation of any human rights principles and standards, the policy charts out

procedures and actions to be undertaken by UPL in case complaints or breaches are reported.

Our Approach

We endeavor to respect, protect and uphold human rights across the organization by adhering to the following principles:

1. Prohibition of Child Labor and Protection of Labor Rights

UPL observes zero tolerance to child labor. We recognize the United Nations Convention on the Rights of the Child and all such international laws, conventions or standards. In line with these principles and legal regulations, UPL has put in place a specific Child Labor Policy which prohibits any kind of child labour practices within its premises, offices, factories or warehouses. We have non-negotiable clauses in all our contracts prohibiting use of child labour. Further, we conduct periodical inspections including surprise checks on our third-party suppliers and growers. Any business partner found to be using child labor will be blacklisted by UPL.

UPL is compliant with, and continuously seeks to ensure that the conduct of all employees is aligned with, applicable labor laws and internationally standards of labor and human rights.

2. Diversity and Non-discrimination

We respect diversity and believe in fostering an all-inclusive work environment. We are committed to providing equal opportunity to all and do not tolerate any form of discrimination and harassment. All employees are mandated to work towards making their workplaces free from discrimination or harassment on the basis of color gender,

sex, race, age, nationality, social status, disability, ethnicity, religion, sexual orientation, political opinion or any other status. Any form of harassment, abuse and bullying, sexual or otherwise, that is considered to be threatening, humiliating, offensive or intimidating is dealt with strict measures. We have strict and effective policies in place including the Policy on Sexual Harassment at the Workplace and the Whistle Blower Policy which protects against any kind of discrimination and extends to all employees so that they can voice their concerns regarding any such act.

Hiring, recruitment, development, compensation and promotions in UPL are based on qualifications, performance, skills and experience. We also encourage diversity in all our operations. We believe that a diverse mix of skill-sets and experiences drives innovation and product development, which makes us a better service provider and gives us competitive advantage over others.

3. Freedom of Association

We respect our employees' right to join, form or refrain from a labor union without fear of reprisal, intimidation or harassment. We also recognize that employees may be interested in joining welfare associations or involving themselves in civil or public affairs in their personal capacities. At UPL employees are not restricted from joining or being affiliated with any such associations and their choices are respected. We are open to establishing a constructive dialogue, if required, with any such associations, where required by law.

We compensate employees competitively relative to the industry and local labor market, and in accordance with terms of collective bargaining agreements, where applicable. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

4. Safety

We are strongly committed to the safety of all our employees, customers, business partners and visitors. Employees are encouraged to create a safe and healthy working atmosphere and are required to promptly report any unsafe or hazardous condition; refrain from possessing, consuming or distributing prohibited drugs or controlled substances at the workplace. We ensure that we provide hygienic, humane and conducive working conditions to all our employees and staff members, as well as to those residing in the vicinity of the project site. A healthy and secure workplace is our priority and we follow all applicable workplace safety laws, regulations and standards.

UPL is also committed to maintaining an atmosphere which is devoid of any violence, aggression, intimidation and other dangerous or disorderly conditions. We place stress on engaging a strong and effective security system at our premises, including factories and formulation sites, to safeguard employees from all kinds of internal and external threats.

5. Employee benefits

Our employees are compensated competitively relative to the industry and the local labor market. We strive to promote work-life balance by offering equal benefits to all our employees. This helps us keep our employees motivated and encouraged at all times.

6. Community Engagement

At UPL, we ensure that human rights of the communities we work and interact with do not suffer on account of our business operations or activities. We are committed to

good corporate citizenship and we actively assist in the improvement of the quality of life of people in the communities we operate in. We encourage our workforce to volunteer for projects that benefit surrounding communities, while ensuring that the principles of fairness are upheld and no religious or caste based promotional activities are carried out.

UPL is extremely conscious of any kind of adverse environmental impact or risks that may occur during or as a result of its operations. Employees are mandated to adhere to company-wide programs as well as applicable environmental laws and regulations.

Specific Corporate Social Responsibility initiatives are undertaken to make local communities self-reliant and to provide adequate support to indigenous groups, which could be disadvantaged or marginalized, in order to uplift them.

Our Compliance Program

To ensure that human rights violations are avoided at all costs and in order to mitigate any potential risks at UPL, will give tremendous importance to a well-designed compliance program which consists of:

1. Legal Compliance

UPL complies with all the relevant laws and regulations related to human rights. We make best efforts to periodically identify operations and locations which are at risk of human rights violations and take appropriate mitigations measures. Our belief in responsible, honest and ethical behavior forms a part of our Global Code of Conduct and our organizational values.

2. Trainings and Awareness Sessions

UPL emphasizes on creating awareness regarding human rights and conducts awareness programs for all stakeholders including its employees. We communicate relevant policies through a plethora of media such as campaigns, workshops, training, e-learning, seminars, mailers etc.

3. Grievance Redressal

We seek to ensure that stakeholders who are or could be affected by our activities have access to an effective grievance mechanism. This Human Rights Policy is aligned with UPL's Global Code of Conduct which lays down a grievance mechanism for all stakeholders to address and resolve issues or potential violations. No action or reprisal would be taken against any employee for raising concerns under this policy. The Company will investigate, address and respond to the concerns of the stakeholder and will take appropriate corrective action in response to any violation. Our grievance cell (grievance@upl-ltd.com) is accessible to all stakeholders to address and resolve issues and concerns with great sensitivity and urgency.

Administering this Policy

We urge all our employees to strictly adhere to the principles laid down in this policy and endeavor to prevent any violation or suspected violation of this policy by being proactive. If any individual is found to be violating this policy, strict action would be taken by the organization.

We hope to receive a full-hearted support by all those associated with UPL Limited and its group companies to be committed towards upholding Human Rights of all those working with us and those who get impacted by our business operations.

Oversight

Human rights commitments and actions are overseen by committee consisting of Senior Leadership headed by Chief Human Resources Officer. The policy will be reviewed regularly by the Committee to ensure it reflects continuous compliance with the above principles.