



Sustainability Policy for Responsible Care

Policy fact sheet

Policy owner:	Dr. Mritunjay Chaubey
Policy approver:	Mr. Raj K Tiwari
Version:	01
Date:	15 th January 2024
Scope:	The Sustainability Policy is applicable to “UPL and its Group Companies” (hereafter referred to as UPL Group) Employees, Contractual Employees, Vendors, Suppliers, Business Partners, and all other stakeholders. This policy is valid for all UPL Group locations globally
Confidential:	Public Access

Contents

- Policy fact sheet2
- Contents.....3
- 1. About the policy.....4
 - 1.1 Environment Dimension.....4
 - 1.2 Social Dimension5
 - 1.3 Governance Dimension5
 - 1.4 Sustainability for Responsible Care7

1. About the policy

UPL's journey toward sustainability is more than a commitment—it's an intrinsic part of our core business strategy. Our goal is to create a sustainable ecosystem that benefits not only our internal operations but also all our stakeholders. This commitment echoes through our daily operations, aiming to foster a thriving environment while ensuring lasting value for our people, communities, and partners. Building upon this foundation, our Sustainability Policy for Responsible Care serves as a blueprint for UPL's holistic approach to sustainability, encompassing the Environment, Social, and Governance (ESG) dimensions. This policy underscores our dedication to the Responsible Care guiding principles, aligning with the seven dedicated codes of management while delineating the focal points for achieving sustainable practices throughout our value chain.

1.1 Environment Dimension

The Environment Dimension within UPL's sustainability policy stands as a cornerstone of our commitment to fostering a sustainable ecosystem. We integrate sustainability into our daily operations to ensure a thriving environment for our stakeholders. Our commitment to the Environment Dimension aligns with our ongoing efforts to make this aspect of our operations even more sustainable. We aim to achieve this by steadfastly adhering to the following guiding principles:

- Adopt a science-based approach, encompassing 100% of our operations under a comprehensive sustainability and environmental management policy.
- Implement Responsible Care initiative practices, striving to achieve international standards in pollution prevention.
- Comply with all applicable statutory and other requirements pertaining to Environmental Management System (EMS) as well as make necessary improvements to go beyond compliances.
- Embrace global environmental policies, best practices, and cutting-edge technologies to enhance our environmental performance.
- Responsibly utilize natural resources, meeting present needs without compromising the requirements of future generations.
- Conserve natural resources by adopting responsible usage practices, thereby reducing our environmental footprint.
- Ensure zero harm to biodiversity in our operational areas, fostering a culture of environmental management among our employees.
- Cultivate environmental awareness among our employees and local communities.
- Aim to shift towards cleaner and greener fuel, adopting new innovative technologies for pollution abatement and promoting sustainable practices in all our units.
- Implement a comprehensive product lifecycle management strategy that emphasizes reducing environmental impact from product creation through use and disposal, fostering responsible consumption patterns and encouraging recycling initiatives.
- Strive for product innovation, aiming to develop eco-friendly alternatives, reduce waste generation, and enhance product efficiency while adhering to strict environmental standards and regulations.

*For detailed Biodiversity and Environment management policies: *

- [Biodiversity Policy] [Biodiversity-Policy.pdf \(upl-ltd.com\)](#)

- [Water Conservation Policy] [Water-Conservation-Policy.pdf \(upl-ltd.com\)](#)

- [Energy Conservation Policy] [Energy-Conservation-Policy.pdf \(upl-ltd.com\)](#)

1.2 Social Dimension

The Social Dimension within UPL's sustainability policy stands shoulder to shoulder with our commitment to nurturing a thriving ecosystem. Just as we prioritize environmental sustainability in our daily operations, we equally emphasize cultivating a work culture steeped in fairness, equality, and respect. Concurrently, we ensure a steadfast dedication to Occupational Health and Safety (OHS), fostering safe, hygienic, and accessible workplaces across our global operations. Our commitment to the Social Dimension aligns with our ongoing efforts to make this aspect of our operations even more sustainable. We aim to achieve this by steadfastly adhering to the following guiding principles:

- Zero tolerance for child, forced, or involuntary labour, in adherence to international laws and conventions.
- Cultivation of an inclusive work environment, championing diversity while prohibiting discrimination and harassment and following an effective mechanism for addressing employee concerns.
- Commitment to employee well-being and work-life balance through dedicated systems
- Employee empowerment to freely join or refrain from labour unions without fear of reprisal.
- Emphasis on personal safety, harassment-free environments, safe, hygienic, and accessible workplaces across all locations.
- Ensuring fair, timely, and transparent payment of wages, aligning with labour laws and regulations.
- Extension of equal opportunities to all employees and provision of skill development opportunities without discrimination. Rigorous compliance with human rights regulations to ensure equal opportunities for all backgrounds.
- Adherence to all applicable labour laws and regulations, strictly following human rights norms and to follow a robust grievance redressal mechanism addressing human rights concerns.
- Empowerment initiatives for employees to understand relevant human rights laws and encouraging of value chain partners to avoid human rights violations.
- Guiding principles driven by Core Values for product quality and customer value. Preference for local products and suppliers after quality evaluation against set standards.
- Management's dedicated approach to Occupational Health and Safety (OHS) across operations, implementing Responsible Care initiatives and complying with statutory requirements.
- Continual improvement in OHS through risk assessments, education, and training provisions, alongside periodic review, and communication of OHS policies to stakeholders.
- Aligning all its CSR activities as per the categories listed under Schedule VII of the Companies Act, 2013 (as amended from time to time).
- Thorough maintenance of records relating to CSR activities and expenditure for reporting and audit via internal controls, monitoring, evaluation, and impact assessment documentation.

*For detailed CSR and OHS policies: *

- [CSR Policy] <http://www.dmartindia.com/investor-relationship>
- [OHS Policy] <https://www.upl-ltd.com/UPLs-OHS-Policy.pdf>
- [Human Rights Policy] [UPL_Human_Rights_Policy.pdf \(upl-ltd.com\)](#)
- [Child Labour Policy] [Child-Labour.pdf \(upl-ltd.com\)](#)
- [Grievance Redressal Policy] [Grievance-Redressal.pdf \(upl-ltd.com\)](#)
- [Equal Employment Opportunity Policy] [EEO-Policy.pdf \(upl-ltd.com\)](#)

1.3 Governance Dimension

UPL is committed to the highest standards of corporate governance to ensure transparency, accountability, and ethical conduct in all aspects of its operations.

The Governance Dimension within UPL's Sustainability Policy stands as the bedrock of our commitment to responsible corporate conduct and ethical practices. Rooted in principles of transparency, accountability, and integrity, this dimension encompasses a comprehensive framework that guides our decision-making

processes and organizational behaviour. At UPL, we recognize that sound corporate governance is paramount for sustaining long-term value creation and fostering trust among our stakeholders. Below are the principles and practices that guide our corporate governance framework: -

- The Board shall be composed of a balanced mix of executive and non-executive directors, ensuring independence and diversity.
- Clearly defined roles and responsibilities for the Board, including oversight of strategy, risk management, and financial performance.
- Implementation of a comprehensive Code of Conduct for all employees, emphasizing ethical behaviour, integrity, and compliance with applicable laws and regulations.
- Zero-tolerance for bribery and corruption, with strict adherence to international anti-bribery laws.
- Ensuring equal treatment of all shareholders, safeguarding their rights, and facilitating effective communication.
- Timely and transparent communication of financial information, strategy, and major developments.
- Implementation of robust risk management processes with the Board overseeing identification, assessment, and mitigation of risks.
- Maintenance of effective internal control systems to ensure reliability of financial reporting and safeguarding of assets.
- Development of policies for engaging with stakeholders, including employees, customers, suppliers, and the community.
- Commitment to corporate social responsibility initiatives aligned with the organization's values and objectives.
- Adherence to all pertinent tax-related laws, rules, regulations, and disclosure requirements in the respective geographies of operation.
- Evaluation of tax planning opportunities within defined risk parameters, with periodic reviews considering evolving jurisprudence.
- Transparent and timely response to tax inquiries and audits, engaging with government, tax authorities, and regulators in a constructive, professional, and transparent manner.
- Commitment to maintaining fairness, consistency, and sustainability in distributing profits, strictly following the objectives outlined in the organization's Dividend Distribution policy.
- Timely and comprehensive disclosure of material information to stakeholders, promoting transparency.
- Clear guidelines for the nomination and selection of directors, ensuring diversity and expertise on the Board.
- Establishment of a fair and transparent remuneration policy, aligning with the organization's goals and performance.
- Formation of an independent Audit Committee responsible for overseeing the effectiveness of the internal and external audit functions.
- Fostering a culture of compliance with laws and regulations, with regular reviews and updates to ensure alignment.
- Regular review of this Corporate Governance Policy to align with changing regulatory and business environments.
- Establishment of mechanisms for stakeholders to provide feedback and suggestions for improvement.
- Strive to prevent the giving and receiving of improper advantages with customers and trade partners in sales and purchasing activities.
- Prohibit unauthorized use of third-party intellectual property and the illegal reproduction of copyrighted works.

- Strictly prohibit individuals associated with the company from using undisclosed company information to trade its stocks.
- Mandate companies to fulfil corporate responsibility in the business processes involved in creating products and services.
- Encourage the establishment of a CSR/sustainable procurement policy, widely disseminating and instilling it both within and outside the company.

For detailed corporate governance policies of UPL:

- [Nomination and Remuneration Policy] [Nomination-and-Remuneration-Policy.pdf \(upl-ltd.com\)](#)
- [Anti Bribery & Corruption Policy] [Anti Bribery and Corruption Policy.pdf \(upl-ltd.com\)](#)
- [Global Code of Conduct] [Code of Conduct.pdf \(upl-ltd.com\)](#)
- [Whistle-blower Policy] [UPL-PROPOSED--WHISTLE-BLOWER-POLICY.pdf \(upl-ltd.com\)](#)
- [Enterprise Risk Management Policy] ([UPL ERM-Policy.pdf \(upl-ltd.com\)](#))
- [Global Business Information Protection Policy] [Global-Business-Information-Protection-Policy.pdf \(upl-ltd.com\)](#)
- [Information Security Policy] [Name of the Sub-topic \(upl-ltd.com\)](#)
- [Tax Strategy and Policy] [UPL-Tax-Policy updated-FY-2022-23.pdf \(upl-ltd.com\)](#)

1.4 Responsible Care

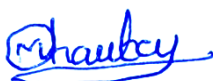
In our pursuit of sustainability, UPL joined the Responsible Care (RC) initiative back in 2004—a Chemical Industry Initiative aimed at showcasing companies' commitments to enhancing all facets of performance concerning the safeguarding of health, safety, and the environment. Recently, in November 2023, our unwavering dedication to sustainability across our value chain resulted in UPL Limited being re-certified as a Responsible Care Company, allowing us to become a proud RC logo holder company once again.

To strengthen our RC commitments and drive sustainability forward, we consistently adhere to the guiding principles of responsible care, aligning with the 7 Responsible Care codes: 1. Process Safety, 2. Employee Health and Safety, 3. Pollution Prevention, 4. Emergency Response, 5. Distribution, 6. Product Safety and Stewardship, and 7. Security. UPL aims to instil these RC guidelines throughout its entire value chain, adhering to the following principles:

- The top management will adopt policies reflecting the company's vision on sustainability, emphasizing resource optimization, energy conservation, process selection, and concerns related to safety and security.
- Ensure that the selection of new products is based on a thorough study of issues related to product safety, resource conservation, and the application of green chemistry whenever possible. Consider alternatives for safer management and technologies.
- Research and design of new facilities should prioritize waste minimization and explore and adopt opportunities for release reduction.
- Recognize and respond to community concerns about chemicals and our operations.
- Prioritize environmental, health, safety, and security considerations in the planning of all existing and new plants and processes.
- Operate plants and processes in a manner that safeguards the environmental, health, safety, and security of our employees and the public.
- Extend knowledge by conducting or supporting research on the environmental, health, safety, and security effects of our products, processes, and waste materials.
- Promptly report to officials, employees, customers, and the public information on chemical-related health or environmental hazards and recommend protective measures.

- Collaborate with government and others to establish responsible laws, regulations, and standards to safeguard the community, workplace, and environment.
- Develop and produce chemicals that can be manufactured, transported, used, and disposed of safely and securely.
- Counsel customers on the safe and secure use, transportation, and disposal of chemical products.
- Collaborate with others to resolve problems arising from the past handling and disposal of hazardous substances.
- Promote the principles and practice of Responsible Care by sharing experiences and offering assistance to others involved in the production, handling, use, transportation, or disposal of chemicals.
- Extend knowledge by conducting or supporting research on the environment, health, safety, and security of our employees and the public.
- Ensure a continuous performance improvement process involving planning, goal and objective establishment, progress and performance monitoring, trend analysis, and the development and implementation of corrective actions.
- Periodically review the impact of the policy and its long-term effects on sustainability.

Signature



Mritunjay Chaubey
Global Head - Environment & Sustainability

Signature



Raj K Tiwari
CEO – Speciality Chemicals and Whole Time Director

Date: 21st February 2024

Place: Mumbai

Revision: 1.0