

An aerial, high-angle view of a city at night. The city is illuminated with warm lights, and the streets are visible. A large, glowing sphere with concentric rings of orange and yellow is positioned in the center of the image. The sphere has a textured, slightly grainy appearance. The city buildings are dark, and the streets are lit up with yellow and white lights. The overall color palette is dominated by the warm tones of the sphere and the cool blues and greys of the city at night.

# UPL

OpenAg™

Global Code of Conduct



# OpenAg

An open agriculture  
network that feeds  
sustainable growth for all.  
No limits, no borders.

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# Foreword

Everyone in UPL is responsible for championing our culture. Our success depends on us weaving our culture into every aspect of our business. It shapes how we behave, both collectively and individually.

To fully live our culture, we all need to know our purpose, vision, mission, pillars and exhibit the behaviours that drive our values individually and corporately.

This Code of Conduct serves as our compass to do business in all the geographies where UPL operates globally.

Our vision is to be an icon for growth, technology, and innovation. We will only achieve this by becoming an admired model across everything we do, defining and meeting a standard of behaviour that is truly world-class.

I promise to live up to these principles in the way I personally operate and I hope that each and every one of you will too.

**Jai Shroff**

Global Chief Executive Officer  
UPL Group.



# Vision:

Our vision is to be  
an icon for growth,  
technology and  
innovation.

# Mission:

Change the game  
- to make every single  
food product more  
sustainable.

# Values:

## Live UPL

Always human  
Nothing's impossible  
Win win win

## Work UPL

One team, one focus  
Agile  
Keep it simple, make it fun





# Always human.

**OpenAg is connecting people  
- creating new opportunities for all.**

## **Behaviour**

- Respect and trust each other.
- Celebrate diversity, promote open feedback.
- Engage proactively in all directions.

We are all about connecting with people, in a human way - showing respect, demonstrating trust, celebrating diversity. For us technology is an enabler, not the endgame. We see the value in human connectivity and how it creates new opportunities for everyone. With this, comes our promise to protect people's safety in every way we can.



# Nothing's impossible.

**OpenAg is thinking out of the box and going beyond our comfort zone. Never afraid to ask, 'Why not?'**

## **Behaviour**

- Anticipate future customer needs.
- Run with new ideas, wherever they may come from.
- Work with partners to change the game.

There isn't any limit to our ambition or our ability to grow. We are not afraid to run with new ideas, work with new partners, anticipate new needs, push ourselves beyond our comfort zones or simply ask, 'Why not?'. We dare to change the game and create a new food economy for the world.



# Win, win, win.

**With OpenAg we serve a cause bigger than ourselves  
- sustainable solutions where everyone wins.**

## **Behaviour**

- Play for everyone - society as a whole; agriculture and food systems; our own company and its people.
- Make responsible choices that lead to sustainable growth (with environmental, safety and Financial angles covered).
- Prioritise resources to opportunities that are transformative in the long-term.

We serve a cause bigger than ourselves - sustainability of global food systems. We win when we create sustainable solutions based on responsible choices, when everyone we serve and partner with grows too, and when together we achieve sustainable growth for society as a whole - the biggest win of all.





# One team, one focus.

**Everyone plays for OpenAg.  
One team, for maximum focus.**

## **Behaviour**

- No silos, no hidden agendas, no playing politics, no 'information is power', no saying 'yes' when we don't mean yes!
- Focus on understanding what people need and want starting with farmers, through to the end-consumer.
- We work together as a team, champions of OpenAg.

We are one team, for maximum impact. One team with shared goals. We all play for the team and no-one plays against team. We have a laser-like focus on what our customers need and want, on anticipating their future needs and how we can create innovative solutions and experiences for them



# Agile.

OpenAg is fast. We mix the power of speed, with structure from process. The world needs our urgency.

## Behaviour

- Make calculated bets, with the right level of risk.
- Back these up with the right process.
- No micro-managing, empower people around you.

No-one is faster or more efficient. We thrive on targets and challenges that, while possibly daunting at first glance, only excite and energize us. Wherever we operate, speed and agility are in our DNA. The world needs our urgency.



# Keep it simple, make it fun.

**OpenAg creates simple, innovative solutions to complex challenges. And wherever we can, we have fun.**

## **Behaviour**

- Create clarity.
- Make it easy for people to collaborate with each other (customers, partners, our own teams).
- Invent ways to make it inspiring for everyone.

Food systems are highly complex and present huge challenges. We cut through this, by keeping it simple. People value simplicity, customers especially. And everyone likes fun, so let's have some, doing what we love to do.



# About the Code of Conduct

The Code of Conduct expresses UPL's commitment to conducting business ethically. It explains what it means to act with integrity and transparency in everything we do and in accordance with our unique culture and values. As members of the UPL family, let us follow not only the letter of the Code, but its intent and spirit as well. This means we should:

- Understand the areas covered by the Code, Company policies and procedures, and laws that apply to our job.
- Follow the legal requirements of all locations where we do business.
- Conduct ourselves in ways that are consistent with the Code, Company policies, procedures and laws.
- Speak up if we have concerns or suspect violations of the Code, Company policies, procedures and laws.
- When requested, certify that we have reviewed, understood and agreed to follow the Code.
- Understand that following the Code is a mandatory part of our job.

The Code cannot address every situation that may occur. We are expected to exercise good judgment and ask questions when we need guidance or clarification. Many resources are available to assist us. These include our managers, the Human Resources Department, the Legal Department and other resources as may be informed from time to time. In addition to the Code, we should also be aware of all Company policies and procedures applicable to our work. You may refer to the Policy Portal which is a repository of all our policies.

# Scope and Purpose of this Code



This Code sets expectations for all those who work with us. We also expect those who deal with us to be aware that this Code underpins everything we do, and in order to work with us they need to act in a manner consistent with it.

**The Code acts as a guideline while dealing with the broadly categorised following stakeholders:**

Employees

Customers and Suppliers

Communities and Environment

Governments

Shareholders

"Code" means this Code of Conduct; "We", "Us" or "Company" means UPL and group companies, our directors, employees and those who work with us, as the context may require.

# Clauses Concerning Stakeholders

# Employees

UPL's differentiated HR strategy has helped reinforce our market leadership and cross-functional coordination across 120+ countries. Today, we employ more than 10,000 employees from 60 countries. It is the duty of all employees to uphold the highest standard of work while conducting business. For this purpose, employees must follow the Code of Conduct as well as the relevant laws and regulations of the country while discharging their duties. It is UPL's commitment to adhere to and fulfil all regulatory requirements laid down for the industry while performing its business activities. We invest in formal and informal trainings as well as on-the-job learning. We have transferred key executives across geographies to enrich our international leadership talent pool. We have reinforced engagements with employees across levels by providing an enriching workplace, intellectually challenging job profile and a continuous dialogue.



## 01 Equal Opportunity Employer

We provide equal opportunities to all our employees and to all eligible applicants for employment in our Company. We do not discriminate on any ground, including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by the applicable law.

When recruiting, developing and promoting our employees, our decisions are based solely on performance, merit, competence and potential.

We have fair, clear and transparent employee policies which promote diversity and equality in accordance with the applicable law and other provisions of this Code. These policies provide for clear terms of employment, training, development and performance management.

## 02 Non-Harassment

The Company does not tolerate harassment of any kind. Harassment can unreasonably interfere with an individual's work performance and create an intimidating or offensive work environment.

Harassment can include slurs or derogatory comments, offers of job benefits in exchange for sexual favours, and other forms of offensive behaviour. Harassment can also include conduct directed at or by a UPL employee, an employee of the Company's customers or suppliers or other business associates. Sexual harassment is dealt with zero tolerance at UPL.

Harassment can also take place by inappropriate use of Company computers and communication systems. This includes accessing and sharing sexually oriented and other inappropriate material or engaging in sexual, racial or other types of harassment. Indulging in these activities amounts to serious misconduct and violators will be penalized.

### 03 Safety and Health

At UPL, we are committed to providing a safe and healthy workplace for employees, customers, business partners, visitors and vendors working within, or visiting, our facilities and premises. Every employee is responsible for making safety and health a priority and should:

- promptly report unsafe or hazardous conditions to supervisors.
- comply with all policies, laws, regulations and standards relating to conditions of employment, including those concerning hours, wages and other working conditions.
- comply with applicable workplace safety laws, regulations and standards.
- refrain from possessing, consuming or distributing prohibited drugs, alcohol and controlled substances at our workplace, or during Company duties at the workplace. However, subject to the applicable local law, consumption of alcohol at the workplace may be allowed for special occasions or for certain business meetings, as long as such use is limited and the employee does not violate any legal regulations.



## 04 Media Policy

**Use of Social Media:** “Social media” includes any digital communication channels that allow individuals to create and share content and post comments. On social media, employees should be polite, respectful, and remember that one’s conduct may impact the way others view who we are and what we stand for as a Company. This applies to communication related to job responsibilities and personal communication that may impact the Company. Do not share or post comments about the Company’s financial performance, sales trends, strategies, forecasts, legal issues, future promotional activities, or any other confidential business information. Similarly, do not share or post information about customers, suppliers, other business partners, or Company employees. Employees should be mindful of the content created, shared and posted, remembering that the Internet is a public place. Always use good judgment when engaging in social media. Only the people officially designated for such interactions should engage with any member of the press and media in matters concerning the Company. Any requests for interaction should be directed to the Corporate Communications Department.





## 05 Data Privacy

In the course of business, we may collect, hold or process personal information about employees, consultants, business partners and customers. We treat such personal information with care and take responsibility for protecting it and using it lawfully and properly. Personal information shall be collected only for legitimate business purposes, shared only with those who are legally permitted to have access, protected in accordance with security policies and retained only for as long as necessary. We also must ensure that third parties with access to personal information are contractually obligated to protect it.

## 06 Conflict of Interest

A conflict of interest occurs when a personal relationship or activity could influence your judgment and ability to perform your job in an objective way and uphold your duties to your employer. Even the appearance or perception of a conflict of interest can place our Company at risk. As employees, we should never allow personal gain or benefit to prevent us from doing what is in the best interest of our Company. It's not always clear whether an activity creates a conflict of interest. However, it is the responsibility of every employee to disclose a potential conflict. For this reason, employees should discuss any potential conflicts, or questions about how to best handle a situation of conflict with their managers, the Human Resources Department or the Legal Department.

Instances which can be regarded as conflict of interest and the expected behavior from employees:

### a. Freedom of association

We recognise that employees may be interested in joining associations or involving themselves in civic or public affairs in their personal capacities, provided such activities do not create an actual or potential conflict with the interests of our Company. Our employees must notify and seek prior approval wherever necessary for any such activity from their manager, the the Human Resource Department or the Legal Department, and in accordance with applicable Company policies and law.

## b. Outside employment, work or activity

Taking employment, accepting a position of responsibility or running a business outside employment with our Company, on your own time, with or without remuneration, could interfere with your ability to work effectively at our Company or create conflicts of interest. Any such activity must not be with any customer, supplier, distributor or competitor of our Company. Our employees must notify and seek prior approval for any such activity from their manager, the Human Resources Department, or the Legal Department, and in accordance with applicable Company policies and law.

## c. Expense reporting and reimbursement

Employee travel and other related expenses should be consistent with the needs of business and follow Company policies and procedures. The Company's intent is that an employee does not lose or gain financially as a result of business travel and accommodation. Employees are expected to spend the Company's money as carefully as they would their own.

Employees who submit or approve expense reports are responsible for ensuring that:

- Expenditures are proper and reasonable.
- Expense reports are submitted promptly.
- Receipts and explanations properly support reported expenses.

## d. Family members and close personal relationships

It is obligatory for an employee to declare that he/she is related to any other employee of the Company as soon as he/she discovers it, to the HR department. Avoid holding a position with access to or influence over performance appraisals, salary information or other confidential information related to a family member. Employment of relatives is subject to management discretion.

### e. Gifting and hospitality

UPL and its employees shall neither accept nor offer to government officials or private parties (directly or indirectly) any illegal payments, remuneration, gifts, donations, or comparable benefits that are intended or perceived to be intended to obtain business or any improper advantage, or to influence any act or decision. Employees may however accept and offer gifts during the course of business, provided such gifts are customarily given, of a nominal value, and are of a commemorative nature, such as diaries, calendars and other stationery items. Employees may also attend and take others out for normal or customary business lunches, dinners and functions. These should however not impact or compromise objectivity and fairness of an employee while taking Company decisions. The foregoing should not, however, be offered to government officials, unless they comply with all applicable laws and are approved in advance by the Legal Department.

For additional guidance, consult our Anti-bribery and Corruption policy.

### f. Corporate opportunity

All employees should ensure that the Company does not lose any benefit accruing to it by negligence or delay in action. Any benefit accruing to the Company should be used only for Company purposes. There should not be any personal gain arising out of it. However, in specific instances where there are some indirect benefits accruing to employee(s), specific approval should be obtained. While working at UPL, employees are likely to learn about, or be involved in developing business opportunities to serve the Company's corporate objectives.

Employees must not take improper advantage of these situations. Specifically, employees may not:

- personally take business opportunities that arise through use of Company property, information, or one's position with the Company.
- directly or indirectly compete with the Company for business opportunities that the Company is pursuing.

## 07 Confidentiality & Intellectual Property Protection

Employees will encounter a variety of confidential information which may take many forms. They must take proper care of such information and ensure that it is not misused in any way or used for their own benefit. Employees who have access to proprietary and confidential information must take precaution to keep it confidential. Information should be disclosed on a need-to-know basis to people who need to know such information and employees should exercise their own discretion in the same.

UPL has a procedure for entering into confidentiality agreements with various vendors, which shall be executed before any information is shared with them.

An employee is expected to accept only such information as is necessary to accomplish the purpose for which it is received, and not for any other purpose.

All inventions and innovations during the course of business will belong to UPL. These include new products, processes, ideas, and services that get developed while working on various assignments. Every employee should take precaution to prevent any loss of such intellectual property rights and seek counsel from the IPR/Legal Department for protection of UPL's intellectual property.

## 08 Integrity of UPL's Assets and Resources

Each of us is responsible for safeguarding Company property and resources made available to us while employed with UPL. Our property and resources include both our physical assets, such as our facilities, materials and equipment, as well as our communication systems, such as our computers, internet service, mobile phones, telephones and email.

## 09 We Recognize and Respect Cultural Diversity

UPL does business in many regions of the world and our employees, contractors and suppliers come from different places and represent different backgrounds and cultures. We believe that cultural diversity brings with it strength, creativity, and flexibility. We recognize that diversity also brings challenges and requires sensitivity to others. For example, conduct that is socially or professionally acceptable in one culture may not be acceptable in another. It is essential that we all give careful and continuous consideration to these cultural and regional differences and endeavor to be open-minded, respectful, and considerate to those whose backgrounds differ from our own.



# Customer and Suppliers

## 01 Products and Services

- We are committed to supplying products and services of world-class quality that meet all applicable standards.
- The products and services we offer shall comply with the applicable laws, including product packaging, labelling and after-sales service obligations.
- We shall market our products and services on their own merits and not make unfair or misleading statements about the products and services of our competitors.
- We shall endeavor to minimise resource and energy consumption for our customers, ourselves and the society.
- We shall offer products with competitive advantage.

## 02 Dealing with Customers

- Our dealings with our customers shall be professional, fair and transparent.
- We respect our customers' right to privacy in relation to their personal data. We shall safeguard our customers' personal data, in accordance with the applicable law.



### 03 Fair Competition

- We support the development and operation of competitive open markets and the liberalisation of trade and investment in each country and market in which we operate.
- We shall not enter into any activity constituting anti-competitive behaviour such as abuse of market dominance, collusion, participation in cartels or inappropriate exchange of information with competitors.
- We collect competitive information only in the normal course of business and obtain the same through legally permitted sources and means.

### 04 Suppliers, Vendors and Service Providers

- We shall select our suppliers and service providers fairly and transparently.
- We seek to work with suppliers and service providers who can demonstrate that they share similar values. We expect them to adopt ethical standards comparable to our own.
- Our suppliers and service providers shall neither accept nor offer to government officials or private parties (directly or indirectly) any illegal payments, remuneration, gifts, donations, or comparable benefits that are intended or perceived to be intended to obtain business or any improper advantage, or to influence any act or decision.
- Our suppliers and service providers shall represent our Company only with duly authorised written permission from our Company. They are expected to abide by the Code in their interactions with, and on behalf of us, including respecting the confidentiality of information shared with them.
- We respect our obligations regarding the use of third party intellectual property and data.
- We clearly communicate our expectations to our suppliers and vendors; require them to abide by our contractual obligations; expect the same from our suppliers and vendors; and take appropriate measures if they do not meet our expectations.

# Communities and Environment

## 01 Corporate Social Responsibility (CSR)

- We are committed to good corporate citizenship, and shall actively assist in the improvement of the quality of life of the people in the communities in which we operate.
- We engage with the community and other stakeholders to minimise any adverse impact that our business operations may have on the local community and the environment.
- We encourage our workforce to volunteer on projects that benefit the communities in which we operate, provided the principles of this Code, where applicable, and in particular the 'Conflict of Interest' clause are followed.
- In order to ensure fairness and avoid any adverse impact on business, all community activities under the UPL name shall be properly authorized before they are undertaken by any employee. Such activities shall be unbiased, shall not be related to promoting any religion and shall not harm any business interests of the Company.

## 02 UPL Limited's CSR Initiatives are Driven with an Aim

- To implement need based on CSR projects and extension work
- To build the capacity of communities to make them self-reliant
- To develop partnerships with all stakeholders
- To promote and institutionalize CSR with UPL Group's business strategy

### 03 Environment & Sustainability

Protecting the environment is our duty towards life. At every step, we are conscious of fulfilling our responsibility in sustaining our planet.

At UPL, we are committed to being a premier provider of total crop solutions across the world. Health, safety and protection of people and the environment are the core business values that rank equally with the financial, commercial and community values that sustain our business.

Our corporate-wide sustainability programs help us reduce adverse environmental impacts of our operations, manage environmental risks and pursue sustainability initiatives such as reducing waste and promoting recycling. Employees are required to adhere to Company-wide programs, as well as comply with environmental laws and regulations that relate to our specific work responsibilities.



Ms. Sandra Shroff, Vice Chairman of UPL working with the local community to provide sustainable livelihood solutions for drought-stricken villages.

## 04 Protection of Animals

UPL acknowledges that a significant number of animals are used in the industry and as a responsible industry member, UPL strives to maintain high animal welfare standards. If UPL engages in research, testing or clinical trials relating to animals, we ensure that it takes place in an ethical and legally compliant environment and manner.

## 05 Labour Rights

UPL is compliant with and continuously seeks to ensure that the conduct of all UPL employees is aligned with applicable labour laws, domestic and internationally agreed standards of labour and human rights, such as the Universal Declaration of Human Rights and the International Labour Organization's core conventions. We acknowledge employees' choice to participate in labour unions or other similar employee organizations. Principles of fair compensation and benefits, entitlement to adequate working hours and paid leaves are thoroughly followed at UPL.

## 06 Prevention of Child Labour

Some of the markets where we operate have a higher risk of child labour deployment. We also engage with several business partners whose operations could be exposed to exploitative labour practices, specifically with respect to children. We adhere to a strict no child labour policy and specifically prohibit any kind of child labour practices within our premises, offices, factories or warehouses. Each employee of UPL is required to comply with this policy and ensure that they do not indulge in any practices that lead to or encourage child labour. In addition, we ensure compliance by our business partners by not only making them bound by contractual obligations but also by periodical inspections including surprise checks. Strong action is taken against any business partner found using child labour.

For additional guidance, consult our Child Labour Policy.



A better and  
more sustainable  
future for All



# Governments

## 01 Government Engagement

We engage with the government and regulators in a constructive manner in order to promote good governance. We conduct our interactions with them in a manner consistent with our Code.

We do not impede, obstruct or improperly influence the processes and systems that affect the integrity or availability of data or documents for any government review or investigation.

## 02 Political Non-Alignment

We shall act in accordance with the constitution and governance systems of the countries in which we operate. We do not seek to influence the outcome of public elections, nor to undermine or alter any government systems. We do not support any specific political party or candidate for political office. Our conduct must preclude any activity that could be interpreted as mutual dependence with any political body or person, and we do not offer or give any Company funds, assets or other resources as donations to any political party, candidate or campaign.

Any individual employee of UPL who is involved with or contributes their time to any political organization, does so on a purely voluntary basis and during their own time and at their own expense. Subject to the applicable local law, political contributions can be made as per regional policies of the Company, with written approval of the management.

## 03 Anti-Corruption and Anti-Bribery

UPL does not offer or accept bribes, kickbacks or other corrupt payments, regardless of local practice or perceived customs. Bribery is illegal and it can cripple UPL's long-standing reputation of conducting business with integrity. A bribe is giving or offering to give something of value to someone in exchange for getting or keeping business or for any other business advantage. Never directly or indirectly offer, give, solicit, or accept any form of bribe, kickback or related form of payment.

For additional guidance, consult our Anti-bribery and Corruption Policy.

## 04 Trade Sanctions

Various countries and organizations, such as the United Nations, have imposed trade sanctions against certain countries, organizations and individuals, many of which apply to transactions beyond the borders of the country imposing them. Some sanctions impose a complete ban on all transactions, while others may ban a specific type of transaction, such as trading in specific goods or providing particular services. If you are involved in international business transactions, you must be familiar with and comply with applicable trade sanctions. If you are considering business with a sanctioned country, organization or individual, consult with the Legal Department first. Keep in mind that trade sanction laws can be very complex and change frequently, so a transaction that might have been allowed in the past might not be allowed now.

## 05 Product Registration

UPL is engaged in the manufacture, formulation, marketing, and sale of chemical and biological products used in agriculture and other highly regulated activities. Applicable regulations include those governing registration of products for sale and use in specific countries for specific purposes and labelling with respect to contents, manner of use, safety, and efficacy. We are committed to strict adherence to all laws, rules, and regulations governing registration, labelling, use, and advertising of our products. We do not make false or misleading statements to regulatory agencies, and we take all necessary actions to supply quality products, properly packaged, labelled, and marketed.



# Shareholders

## 01 Record Keeping, Disclosures and Audits

We are committed to enhancing shareholder value and complying with laws and regulations that govern shareholder rights.

- We shall inform our financial stakeholders about relevant aspects of our business in a fair, accurate and timely manner and shall disclose such information in accordance with applicable law and agreements.
- We shall keep accurate records of our activities and shall adhere to disclosure standards in accordance with applicable law and industry standards.
- All information reported or communicated by the Company should be factually correct, complete and accurate. Proper cautionary statements shall accompany wherever necessary, to avoid any misunderstanding or any unintended harm.

## 02 Insider Trading

By law, we are required to publicly disclose certain important information about our Company, such as sales, earnings and significant acquisitions, regulatory matters and other material events. When we publicly disclose this information, it is our responsibility to do so in a fair, complete, accurate and timely way.

Employees may find out important information about the Company before it is released to the public; however, it is every employee's responsibility to keep non-public information confidential. If employees have important information that has not been disclosed to the public, they are not allowed to:

- trade in UPL securities when they have inside information, or share such information with others; both are illegal and can result in severe penalties. Never engage in forward dealings in securities of the Company.

- buy or sell any UPL securities or any other company's securities if they have inside information; or spread false information to manipulate the price of listed securities.
- trade indirectly when in possession of inside information, for example through family members or others, or provide "tips".

All employees are expected to follow the same principles in respect of other listed companies. Furthermore, remember these rules continue to apply even when you are no longer a UPL employee.

(For further information on Insider Trading, please refer to the policy on the Company website or consult the Compliance Officer of the Company based at the corporate office, Mumbai, India)



# Administering the Code

## 01 Every Employee's Responsibility

To maintain and enhance our culture and reputation, we rely on our employees to help enforce the Code. If you think there is a violation of the UPL Code of Conduct, or if you think an activity or behaviour could lead to a violation, it is your responsibility to speak up. Whether you report anonymously or not, you should provide as many details as possible so the issue can be addressed thoroughly and promptly. In addition, you have a responsibility to cooperate in an investigation. Our Company does not tolerate retaliation against anyone who raises a concern under this Code or assists with an investigation. Any employee who engages in retaliation will face disciplinary action, which could include termination of employment.



## 02 Every Manager's Responsibility

If you manage other employees, you have a special and important responsibility to set an example and act in a manner consistent with our Code of Conduct. Here are important guidelines you should follow:

- Act as a role model, demonstrating ethical behaviour in the performance of your duties.
- Make fair and objective business-based decisions.
- Review the Code at least once a year with your team.
- Help employees understand the Code and Company policies and have access to resources to help them live the Code every day.
- Ensure employees are aware of, and properly trained on, the relevant laws, regulations and Company policies that govern the business activities that they are engaged in on behalf of the Company.
- Create an environment where employees are comfortable speaking up without fear of retaliation.
- Take concerns raised by an employee seriously, and take time to understand if the issue should be escalated. If so, escalate the matter as soon as possible.
- Take corrective or preventive action when someone violates the Code.
- Fully support any investigation.
- Recognize and reward ethical behaviour.

## 03 In Case Help, Assistance or Guidance is Required

You can consult your manager, Head of Department, the Human Resources Department or the Legal Department.

## 04 Investigations and Disciplinary Action

The Global Committee and the respective Regional Committees, established to implement the Global Code of Conduct, will review and investigate all violations of the Code and take appropriate disciplinary actions. Investigations will be conducted with appropriate confidentiality and will be respectful and fair.

## 05 Amendments/Modification to the Code

Our Code is reviewed periodically to determine whether revisions may be required due to changes in the law or changes in our business or the business environment.

## 06 Waivers

Any waiver of our Code requires the approval of the Legal Department.



OpenAg™





UPL  
OpenAg™

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