



UPL

Equal Employment Opportunity Policy



Policy fact sheet

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| Policy owner: | HR Department |
| Policy approver: | Global CHRO |
| Version: | 1.0 |
| Date: | 01/04/2020 |
| Scope | This policy applies to all fulltime employees of UPL & its subsidiaries in India |
| Confidential: | No. For internal use only. |

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1. Purpose

UPL provides equal employment opportunities (EEO) to all employees and applicants irrespective of their race, colour, religion, gender, marital status, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, or veteran status. In addition to federal law requirements, in every location in which the company has facilities, UPL complies with applicable state and local laws governing non-discrimination in employment. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

UPL also reinforces EEO through its Corporate Business Principles and Code of Business Conduct.

2. Scope

The EEO policy is applicable across the globe to all employees and potential talent who seek to join or apply for a career at UPL. All staffing companies and contractors employed by UPL are required to adhere to this policy statement, or to one of their own which offers no lesser protections than those set out herein.

3. Principles

3.1 Introduction

UPL expressly prohibits any form of workplace harassment, intimidation, threat, coercion, or discrimination based on race, colour, religion, gender, marital status, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, or veteran status. Improper interference with the ability of UPL's employees to perform their job duties may result in discipline up to and including discharge. Beyond this, employees of and applicants to UPL will not be subject to harassment, intimidation, threat, coercion, or discrimination because they have engaged or may engage in filing a complaint, or assisting in a review/investigation/hearing or have otherwise sought to obtain their legal rights related to any federal, state or local EEO law.

3.2 Dissemination and Implementation of the Policy

The UPL officers listed below are responsible for the dissemination of this policy. Directors, managers, and supervisors are responsible for implementing equal employment practices within each department. The HR department is responsible for overall compliance and will maintain personnel records in compliance with applicable laws and regulations.

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UPL administers its EEO policy fairly and consistently by:

- Posting all required notices regarding employee rights under EEO laws in locations on its premises that are highly visible to employees.
- Advertising for job openings with the statement "We are an equal opportunity employer, and all qualified applicants will receive consideration for employment without regard to race, colour, religion, gender, marital status, sexual orientation, gender identity or expression, national origin, age, genetic information, disability, or veteran status"
- Posting all relevant job openings with the appropriate state agencies.
- Forbidding retaliation against any individual who files a charge of discrimination, opposes a practice believed to be unlawfully discriminatory, reports harassment, or assists/testifies/participates in an EEO agency proceeding.
- Requiring employees to report to any colleague or member of management to their HR representative or the general counsel about any apparent discrimination or harassment. The report should be made within 48 hours of the incident.
- Promptly notifying the general counsel of all incidents or reports of discrimination or harassment and taking any additional measures necessary to resolve the situation.

To promote Equal Opportunity, we:

- Use inclusive language in all signages, documents and printed/digital content.
- Modify structures and facilities to accommodate People With Disabilities.
- Have policies in place for parental leave and flexible work-arrangements.
- Hire, train and evaluate employees based only on job-related criteria.
- Allow employees to take religious or national holidays that aren't included in our company's official schedule.
- Train employees on communication and diversity.
- Implement open door practices so that employees can report discrimination more easily.

3.3 EEO Committee

The company has appointed UPL's global custodians of its EEO. This committee, among other things, is responsible for continually aligning UPL with global EEO best practices.

3.4 Grievance Procedure

Step 1:

The aggrieved employee/job applicant can register their grievance via email to grievance_cell@uniphos.com or UPL@tip-offs.com

Step 2:

The complaint is forwarded to the EEO committee who in turn will work with the respective leadership team and HR representative on the next steps.

Step 3:

EEO committee initiates their enquiry either independently or in consultation with the Unit-level committee for further fact-finding.

Step 4:

The committee ensures that the entire enquiry is done in a fair, neutral, and unbiased manner. Wherever possible, sincere efforts shall be made to establish a dialogue between the concerned parties

Step 5:

The entire enquiry is to be concluded within 60 days' time and the response communicated to the aggrieved party. The timeline can also be mutually agreed-upon between the aggrieved party and committee – It should not however, go beyond 120 days.

Step 6:

If found guilty, the party in question can be subjected to disciplinary proceedings, including and up to termination of employment. **The decision of the committee is final and binding.**

References:

Also refer to UPL's Human Rights and Grievance Redressal Policy.