**UPL Limited**, Uniphos House,
C.D. Marg, 11th Road, Madhu Park,
Khar (West), Mumbai – 400052,
India

w: www.upl-ltd.com
e: contact@upl-ltd.com
t: +91 22 6856 8000

July 15, 2026

BSE Limited
Mumbai

**SCRIP CODE: 512070**

National Stock Exchange of India Ltd
Mumbai

**SYMBOL: UPL**

**Sub.: Submission of Business Responsibility and Sustainability Report for FY 2025-26**

Dear Sir/Madam,

Pursuant to Regulation 34(2)(f) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby submit the Business Responsibility and Sustainability Report ('BRSR Report') for the financial year 2025–26.

The BRSR Report includes the Independent Reasonable Assurance Statement on the BRSR Core Indicators issued by TÜV SÜD South Asia Private Limited. The said report forms an integral part of the Annual Report of the Company for FY 2025–26.

We request you to take the above on record.

Thanking you,

Yours faithfully,
For **UPL Limited**

Sandeep Mohan Deshmukh

Digitally signed by Sandeep Mohan Deshmukh
Date: 2026.07.15 21:38:03 +05'30'

**Sandeep Deshmukh**
**Company Secretary and Compliance Officer**
**(ACS-10946)**

Encl.: As above

# BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT

## SECTION A: GENERAL DISCLOSURES

### I. DETAILS

| | | |
|---|---|---|
| 1 | Corporate Identity Number (CIN) of the Listed Entity | L24219GJ1985PLC025132 |
| 2 | Name of the Listed Entity | UPL LIMITED |
| 3 | Year of incorporation | 1985 |
| 4 | Registered office address | 3-11, G.I.D.C., Vapi, Valsad-396195, Gujarat |
| 5 | Corporate address | UPL Limited, Uniphos House, Chitrakar Dhurandhar Road, 11th Road, Near Madhu Park Garden, Khar West, Mumbai - 400052 |
| 6 | E-mail | upl.investors@upl-ltd.com |
| 7 | Telephone | +91 22 71528000 |
| 8 | Website | https://www.upl-ltd.com/ |
| 9 | Financial Year for which reporting is done | 01-04-2025 31-03-2026 |
| 10 | Name of the Stock Exchange(s) where shares are listed | Equity Shares of the Company are listed on BSE Limited and National Stock Exchange of India Limited. Global Depository Receipts (GDR) of the Company are listed on Singapore Stock Exchange and Admitted for Trading on the International Order Book (IOB), London Stock Exchange's electronic trading platform for GDRs. The existing GDRs additionally have a dual listing on NSEIX in GIFT City. |
| 11 | Paid-up Capital | ₹ 169 Crores |
| 12 | Name and contact details (telephone, email address) of the person who may be contacted in case of any queries on the BRSR report | |
| | Name Of Contact Person | Mr. Raj Tiwari |
| | Contact Number Of Contact Person | +91 22 71528000 |
| | Email Of Contact Person | upl.investors@upl-ltd.com |
| 13 | Reporting boundary - Are the disclosures under this report made on a standalone basis (i.e. only for the entity) or on a consolidated basis (i.e. for the entity and all the entities which form a part of its consolidated financial statements, taken, together). | Standalone |
| 14 | Name of assurance provider | TUV SUD South Asia Pvt. Ltd. |
| 15 | Type of assurance obtained | Reasonable Assurance for BRSR Core |

### II. PRODUCTS/SERVICES

**16. Details of business activities**

| S. No. | Description of main activity | Description of business activity | % of turnover |
|---|---|---|---|
| 1 | Manufacturing | Chemical & Chemical Products | 83.20 |
| 2 | Trade | Wholesale Trading | 16.80 |

**17. Products/Services sold by the entity (accounting for 90% of the entity's Turnover):**

| S. No. | Product/Service | NIC Code | % of total Turnover contributed |
|---|---|---|---|
| 1 | Chemical & Chemical Products | 2021 | 83.20 |

### III. OPERATIONS

**18. Number of locations where plants and/or operations/offices of the entity are situated:**

| Location | Number of plants | Number of offices | Total |
|---|---|---|---|
| National | 03 | 71 | 74 |
| International | 0 | 0 | 0 |

**19. Markets served by the entity:**

a. Number of locations

| Location | Number |
|---|---|
| National (No. of States) | 21 |
| International (No. of Countries) | 0 |

b. What is the contribution of exports as a percentage of the total turnover of the entity?

65.15%

c. A brief on types of customers

Our sales strategy primarily focuses on distributing products through established distributor networks, ensuring wide market coverage and efficient supply chain management. However, in certain regions where the market dynamics differ, we also collaborate with cooperatives to facilitate distribution and, in some cases, engage directly with growers to provide tailored solutions and build stronger relationships.

### IV. EMPLOYEES

**20. Details as at the end of Financial Year:**

a. Employees and workers (including differently abled):

| S. No | Particulars | Total (A) | Male | | Female | | Others | |
|---|---|---|---|---|---|---|---|---|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (H) | % (H/A) |
| | EMPLOYEES | | | | | | | |
| 1. | Permanent (D) | 596 | 508 | 85 | 88 | 15 | - | - |
| 2. | Other than Permanent (E) | - | - | - | - | | - | - |
| 3. | Total employees (D + E) | 596 | 508 | 85 | 88 | 15 | - | - |
| | WORKERS | | | | | | | |
| 4. | Permanent (F) | 286 | 286 | 100 | - | - | - | - |
| 5. | Other than Permanent (G) | - | - | - | - | | - | - |
| 6. | Total workers (F + G) | 286 | 286 | 100 | - | - | - | - |

b. Differently abled Employees and workers:

| S. No | Particulars | Total (A) | Male | | Female | | Others | |
|---|---|---|---|---|---|---|---|---|
| | | | No. (B) | % (B/A) | No. (C) | % (C/A) | No. (H) | % (H/A) |
| | DIFFERENTLY ABLED EMPLOYEES | | | | | | | |
| 1. | Permanent (D) | 0 | 0 | 0 | 0 | 0 | - | - |
| 2. | Other than Permanent (E) | - | - | - | - | - | - | - |
| 3. | Total differently abled employees (D + E) | 0 | 0 | 0 | 0 | 0 | - | - |
| | DIFFERENTLY ABLED WORKERS | | | | | | | |
| 4. | Permanent (F) | 0 | 0 | 0 | 0 | 0 | - | - |
| 5. | Other than Permanent (G) | - | - | - | - | - | - | - |
| 6. | Total differently abled workers (F + G) | 0 | 0 | 0 | 0 | 0 | - | - |

**21. Participation/Inclusion/Representation of women**

| | Total (A) | No. and percentage of Females | |
|---|---|---|---|
| | | No. (B) | % (B / A) |
| Board of Directors | 9 | 3 | 33.33 |
| Key Management Personnel | 3 | 0 | 0 |

**22. Turnover rate for permanent employees and workers**

**(Disclose trends for the past 3 years)**

| Particulars | FY 2025-26 (Turnover rate in current FY) [values in %] | | | | FY 2024-25 (Turnover rate in previous FY) [values in %] | | | | FY 2023-24 (Turnover rate in the year prior to the previous FY) [values in %] | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Male | Female | Others | Total | Male | Female | Others | Total | Male | Female | Others | Total |
| Permanent Employees | 13 | 15 | - | 13 | 18 | 2 | - | 20 | 23 | 3 | - | 26 |
| Permanent Workers | 7 | 0 | - | 7 | 13 | 0 | - | 13 | 19 | - | - | 19 |

## V. HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

**23. (a) Names of holding / subsidiary / associate companies / joint ventures**

| S. No. | Name of the holding/ subsidiary/ associate companies/ joint ventures (A) | Indicate whether holding/ Subsidiary/ Associate/ Joint Venture | % of shares held by listed entity | Does the entity indicated at column A, participate in the Business Responsibility initiatives of the listed entity? (Yes/No) |
|---|---|---|---|---|
| 01 | There is no holding company of UPL Limited. The details of subsidiary / associate / joint venture companies are given in Form No. AOC-1, which forms part of this Annual report | | | Yes |

## VI. CSR DETAILS

**24. CSR Details**

| | |
|---|---|
| Whether CSR is applicable as per section 135 of Companies Act, 2013 | Yes |
| Turnover (Rs in Crores) | 5,747.96 |
| Net worth (Rs in Crores) | 14,036.48 |

## VII. TRANSPARENCY AND DISCLOSURES COMPLIANCES

**25. Complaints/Grievances on any of the principles (Principles 1 to 9) under the National Guidelines on Responsible Business Conduct:**

| Stakeholder group from whom complaint is received | Grievance Redressal Mechanism in Place (Yes/No) | If Yes, then provide web-link for grievance redress policy | FY 2025-26 | | | FY 2024-25 | | | If NA, then provide the reason |
|---|---|---|---|---|---|---|---|---|---|
| | | | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | Number of complaints filed during the year | Number of complaints pending resolution at close of the year | Remarks | |
| Communities | Yes | https://www.upl-ltd.com/downloads/sustainability/UPL-Corporate-Social-Responsibility-Policy.pdf | - | - | - | - | - | - | |
| Investors (other than shareholders) | Yes | https://www.upl-ltd.com/corporate_governance_pdfs/Xtwq0iFcPPd8qRX-odOv0nXprMPkvAOr-jb9e6xZPR/Investor-Grievance-Redressal-Policy.pdf | 55 | 1 | 55 complaints (including 1 unresolved complaint of preceding FY) were resolved satisfactorily during the year. | 61 | 1 | 60 complaints were resolved satisfactorily, and 1 pending complaint was received on Scores on 11th March 2025 and the ATR was uploaded on 31st March 2025. The Complaint was closed on SEBI Scores on 24th April 2025. | |
| Shareholders | Yes | | | | | | | | |
| Employees and workers | Yes | 1. https://myportal.upl-ltd.com/emp.policy/assets/files/upl/policy/Code%20of%20Conduct.pdf<br>2. https://myportal.upl-ltd.com/emp.policy/assets/files/upl/policy/Prevention%20of%20Sexual%20Harassment%20Policy.pdf | 0 | 0 | | 2 | 1 | UPL – Closed<br>SAS – Open | |
| Customers | Yes | Customer Care Number & Email ID available on packaging labels<br>https://www.upl-ltd.com/downloads/policies/compliances/UPL_Global_Code_of_Conduct.pdf | 6 | 6 | Pending in Courts | 5 | 5 | Pending in Courts | |
| Value Chain Partners | Yes | https://www.upl-ltd.com/downloads/supplier_portal/UPL_Supplier_Code_of_Conduct.pdf | Nil | Nil | Nil | Nil | Nil | Nil | |

**26. Overview of the entity's material responsible business conduct issues**

Please indicate material responsible business conduct and sustainability issues pertaining to environmental and social matters that present a risk or an opportunity to your business, rationale for identifying the same, approach to adapt or mitigate the risk along-with its financial implications, as per the following format

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|---|---|---|---|---|---|
| 1 | Climate change mitigation | Risk | GHG emissions from business contribute to global warming leading to climate change. This imposes risk on environment and society leading impacts on business. | Focus on renewables leads to lower GHG emission. UPL has developed a detailed Decarbonisation roadmap to reduce its GHG emissions | -ve |
| 2 | Process innovation | Opportunity | Continuous improvement in processes through innovative ideas leads to reduction in energy, water consumption and waste generation. | NA | +ve |
| 3 | Energy management | Risk | Continued reliance on non-renewable energy consumption, leading to higher CO2 emission and environmental damage. | Focus on renewables leads to lower GHG emission. UPL has developed a detailed Decarbonisation roadmap to reduce its GHG emissions | -ve |

| S. No. | Material issue identified | Indicate whether risk or opportunity (R/O) | Rationale for identifying the risk opportunity | In case of risk, approach to adapt or mitigate | Financial implications of the risk or opportunity (Indicate positive or negative implications) |
|---|---|---|---|---|---|
| 4 | Waste Management | Risk | Improper disposal of hazardous and non-hazardous waste leads to significant regulatory, environmental and social issues. It may impose a reputational and financial risk if not focused. | UPL focuses on recycling and co-processing to reduce its waste going to landfill. | -ve |
| 5 | Sustainable supply chain | Opportunity | Optimising the supply chain is always beneficial for organisation and its stakeholders in the value chain. A sustainable supply chain ensures business continuity at an optimized cost. | NA | +ve |
| 6 | Water Use & Management | Risk | Water is a shared resource between communities and business. Responsible consumption and management of water by focusing on recycling and reuse is essential for the business | Recognizing our responsibility towards the environment and society, we have implemented a robust strategy aimed at minimizing our overall water footprint. | -ve |
| 7 | Agriculture Innovation & Productivity | Opportunity | Developing and promoting advanced farming solutions that increase crop yields, improve resource efficiency, and support sustainable agriculture. | NA | +ve |
| 8 | Compliance | Risk | Noncompliance leads to the risk of legal penalties and litigation. It also reduces the trust and brand reputation in the market. | UPL is highly focused on compliance and ensures regular and periodic reviews of current and upcoming compliance requirements. | -ve |
| 9 | Workforce Development & Retention | Opportunity | Workforce is the most important asset for any organisation. Focus on employee development and retention through various initiatives is essential. | NA | +ve |
| 10 | Combating Counterfeit Products | Risk | Counterfeit product can harm customers and the brand. | We outline the supply chain controls, inspections, and advanced authentication technologies implemented to prioritize product integrity and consumer safety, thereby thwarting the spread of counterfeit goods. | -ve |
| 11 | Customer Satisfaction | Opportunity | Customer satisfaction is a critical aspect of business success, impacting both internal operations and external perceptions. | NA | +ve |
| 12 | Occupational Health & Safety | Risk | Process safety refers to prevention of unintentional chemical releases or accidents during manufacturing that could harm people, property, or the environment. | Most of our Indian sites are ISO45001:2018 certified. We are actively considering additional ISO certifications for all our UPL sites, prioritizing their relevance and significance to our business. | -ve |





## SECTION B: MANAGEMENT AND PROCESS DISCLOSURES

### THIS SECTION IS AIMED AT HELPING BUSINESSES DEMONSTRATE THE STRUCTURES, POLICIES AND PROCESSES PUT IN PLACE TOWARDS ADOPTING THE NGRBC PRINCIPLES AND CORE ELEMENTS.

| | |
|---|---|
| **P1** | Businesses should conduct and govern themselves with integrity in a manner that is ethical, transparent and accountable |
| **P2** | Businesses should provide goods and services in a manner that is sustainable and safe |
| **P3** | Businesses should respect and promote the well-being of all employees, including those in their value chains |
| **P4** | Businesses should respect the interests of and be responsive towards all its stakeholders especially those who are disadvantaged, vulnerable and marginalised |
| **P5** | Businesses should respect and promote human rights |
| **P6** | Businesses should respect, protect and make efforts to restore the environment |
| **P7** | Businesses when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent |
| **P8** | Businesses should promote inclusive growth and equitable development |
| **P9** | Businesses should engage with and provide value to their consumers in a responsible manner |

| Disclosure Question | | Whether your entity's policy/policies cover each principle and its core elements of the NGRBCs. (Yes/No) | Has the policy been approved by the Board? (Yes/No) | Web Link of the Policies, if available |
|---|---|---|---|---|
| **Policy and management processes** | | | | |
| P1 | Ethics & Transparency | Yes | Yes | https://www.upl-ltd.com/downloads/policies/compliances/UPL_Global_Code_of_Conduct.pdf |
| P2 | Product Responsibility | Yes | Yes | https://www.upl-ltd.com/downloads/pdf/Updated_Environment_Policy.pdf<br>https://www.upl-ltd.com/downloads/supplier_portal/UPL_Supplier_Code_of_Conduct.pdf |
| P3 | Human Resources | Yes | Yes | https://www.upl-ltd.com/downloads/policies/compliances/UPL_Global_Code_of_Conduct.pdf<br>https://www.upl-ltd.com/images/hse/UPLs-OHS-Policy.pdf |
| P4 | Responsiveness to Stakeholders | Yes | Yes | https://www.upl-ltd.com/corporate_governance_pdfs/Dw5qZKLdbeMmFB7iZr949BcHgMZzvpxu0DTjeKtP/UPL-CSR-Policy-with-AOP.pdf |
| P5 | Respect for Human Rights | Yes | Yes | https://www.upl-ltd.com/images/people/downloads/UPL_Human_Rights_Policy.pdf |
| P6 | Efforts to restore the Environment | Yes | Yes | https://www.upl-ltd.com/downloads/pdf/Updated_Environment_Policy.pdf |
| P7 | Public Policy Advocacy | Yes | Yes | https://www.upl-ltd.com/corporate_governance_pdfs/Dw5qZKLdbeMmFB7iZr949BcHgMZzvpxu0DTjeKtP/UPL-CSR-Policy-with-AOP.pdf |
| P8 | Inclusive Growth | Yes | Yes | https://www.upl-ltd.com/corporate_governance_pdfs/Dw5qZKLdbeMmFB7iZr949BcHgMZzvpxu0DTjeKtP/UPL-CSR-Policy-with-AOP.pdf |
| P9 | Customer Engagement | Yes | Yes | https://www.upl-ltd.com/downloads/policies/compliances/UPL_Global_Code_of_Conduct.pdf |

| Disclosure Question | | Whether the entity has translated the policy into procedures. (Yes / No) | Do the enlisted policies extend to your value chain partners? (Yes/No) | Name of the national and international codes/ certifications/labels/ standards (e.g. Forest Stewardship Council, Fairtrade, Rainforest Alliance, Trustea) standards (e.g. SA 8000, OHSAS, ISO, BIS) adopted by your entity and mapped to each principle. |
|---|---|---|---|---|
| Policy and management processes | | | | |
| P1 | Ethics & Transparency | Yes | Yes | Global Reporting Initiatives Framework, UNGC Principles |
| P2 | Product Responsibility | Yes | Yes | Responsible Care |
| P3 | Human Resources | Yes | Yes | Occupational Health and Safety management system (ISO 45001:2018), UNGC Principles |
| P4 | Responsiveness to Stakeholders | Yes | Yes | Global Reporting Initiatives Framework, UNGC Principles |
| P5 | Respect for Human Rights | Yes | Yes | Global Reporting Initiatives Framework, UNGC Principles |
| P6 | Efforts to restore the Environment | Yes | Yes | Environment Management System ISO 14001:2015, UNGC Principles |
| P7 | Public Policy Advocacy | Yes | Yes | Global Reporting Initiatives Framework |
| P8 | Inclusive Growth | Yes | Yes | UNGC Principles, CSR Rules, Companies Act 2013 |
| P9 | Customer Engagement | Yes | Yes | Global Reporting Initiatives Framework, International Standard on requirements for information security management - ISO 27001: 2013 |

| Disclosure Question | | Specific commitments, goals and targets set by the entity with defined timelines, if any. | Performance of the entity against the specific commitments, goals and targets along-with reasons in case the same are not met. |
|---|---|---|---|
| Policy and management processes | | | |
| P1 | Ethics & Transparency | Performance against our goals and targets are mentioned in the highlights section of this Annual Report. | |
| P2 | Product Responsibility | | |
| P3 | Human Resources | | |
| P4 | Responsiveness to Stakeholders | | |
| P5 | Respect for Human Rights | | |
| P6 | Efforts to restore the Environment | | |
| P7 | Public Policy Advocacy | | |
| P8 | Inclusive Growth | | |
| P9 | Customer Engagement | | |

## Governance, leadership and oversight

7. **Statement by director responsible for the business responsibility report, highlighting ESG related challenges, targets and achievements:**

   Please refer to the Chairman and Group CEO's message, and ESG section in the Annual Report

8. **Details of the highest authority responsible for implementation and oversight of the Business Responsibility policy (ies).**

   Mr. Raj Tiwari, Whole-Time Director, UPL Limited is the highest authority responsible for implementation and oversight of Business Responsibility policy.

9. **Does the entity have a specified Committee of the Board/ Director responsible for decision making on sustainability related issues? (Yes / No).**

   Yes

   **If yes, provide details-** The Board has formed a Sustainability Committee of Directors which is chaired by an Independent Director. The composition of the Committee is available on the website of the Company at the following link: https://www.upl-ltd.com/investors/corporate-governance/board-committees

10. **Details of Review of NGRBCs by the Company:**

| Subject for Review | Indicate whether review was undertaken by Director / Committee of the Board / Any other Committee | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
| Performance against above policies and follow up action Indicate whether review was undertaken by Director / Committee of the Board/Any other Committee | Yes, performance against each policy has been governed and reviewed by Sustainability Committee | | | | | | | | |
| Compliance with statutory requirements of relevance to the principles, and rectification of any non-compliances Indicate whether review was undertaken by Director / Committee of the Board/ Any other Committee | Yes, all the statutory requirements related to the BRSR principles are reviewed by Sustainability Committee | | | | | | | | |
| **Subject for Review** | **Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify)** | | | | | | | | |
| Performance against above policies and follow up action Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify) | Yes, Annually | | | | | | | | |
| Compliance with statutory requirements of relevance to the principles, and, rectification of any non-compliances Frequency (Annually/ Half yearly/ Quarterly/ Any other - please specify) | Yes, Annually | | | | | | | | |

11. **Has the entity carried out independent assessment/ evaluation of the working of its policies by an external agency? (Yes/No). If yes, provide name of the agency.**

   TUV SUD has provided a "Reasonable Assurance" for Core metrics for UPLs Sustainability Report based on BRSR (as per SEBI Circular dated July 12, 2023) and provided limited assurance for other metrics in this report including GRI, SASB and BRSR report.

12. **If answer to question (1) above is "No" i.e. not all Principles are covered by a policy, reasons to be stated:**

| Question | P1 | P2 | P3 | P4 | P5 | P6 | P7 | P8 | P9 |
|---|---|---|---|---|---|---|---|---|---|
| The entity does not consider the Principles material to its business (Yes/No) | NA | | | | | | | | |
| The entity is not at a stage where it is in a position to formulate and implement the policies on specified principles (Yes/No) | | | | | | | | | |
| The entity does not have the financial or/human and technical resources available for the task (Yes/No) | | | | | | | | | |
| It is planned to be done in the next financial year (Yes/No) | | | | | | | | | |
| Any other reason (please specify) | | | | | | | | | |

## SECTION C : PRINCIPLE WISE PERFORMANCE DISCLOSURE

### PRINCIPLE 1

**BUSINESSES SHOULD CONDUCT AND GOVERN THEMSELVES WITH INTEGRITY, AND IN A MANNER THAT IS ETHICAL, TRANSPARENT AND ACCOUNTABLE.**

### ESSENTIAL INDICATORS

1. **Percentage coverage by training and awareness programmes on any of the Principles during the financial year:**

| Segment | Total number of training and awareness programs held | Topics / principles covered under the training and its impact | %age of persons in respective category covered by the awareness programmes |
|---|---|---|---|
| Board of Directors | 25 | The Company on a regular basis familiarizes the directors on various topics of ESG parameters and targets, sustainability initiatives, governance best practices, social contribution, regulatory updates, investor engagement, HR & market update, peer comparison through the board / committee meetings. | 100% |
| Key Managerial Personnel | | | |
| Employees other than BoD and KMPs | 236 | Safety, Quality, Behavioural, Technical, Compliance, Code of Conduct, EHS, Managerial Skills, Communication, Ergonomics & Industrial Hygiene, Human Factor Training, Safety Standards, etc | 100% |
| Workers | 122 | Utkarsh, Safety Standards, Chemical Plant Operator, 5S, DWM, Behavioural Intervention - Safety, Confined Space,etc | 100% |

2. **Details of fines / penalties /punishment/ award/ compounding fees/ settlement amount paid in proceedings (by the entity or by directors / KMPs) with regulators/ law enforcement agencies/ judicial institutions, in the financial year, in the following format (Note: the entity shall make disclosures on the basis of materiality as specified in Regulation 30 of SEBI (Listing Obligations and Disclosure Obligations) Regulations, 2015 and as disclosed on the entity's website):**

   Nil

3. **Of the instances disclosed in Question 2 above, details of the Appeal/ Revision preferred in cases where monetary or non-monetary action has been appealed.**

   Not Applicable

4. **Does the entity have an anti-corruption or anti-bribery policy?**

   Yes

   **If yes, provide details in brief**

   At UPL, we are unwavering in our commitment to preventing, detecting, and deterring fraud, bribery, and all forms of corrupt business practices. We strive to conduct our operations with honesty, integrity, and the highest ethical standards. Given the scale, complexity, and global reach of our business, we recognize the importance of safeguarding our reputation. To achieve this, we have developed and implemented a robust global policy designed to proactively assess, address, and mitigate the risks of bribery and corruption.

   **if available, provide a web-link to the policy.**

   The Anti-Bribery and Anti- Corruption policy can be accessed on https://www.upl-ltd.com/corporate_governance_pdfs/exTCRRkbsuzPcf8z14APGjZWweUn8ZV8Jq2R₹2Di/Anti_Bribary_and_Corruption_Policy.pdf

5. **Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:**

   Nil

6. **Number of Directors/KMPs/employees/workers against whom disciplinary action was taken by any law enforcement agency for the charges of bribery/ corruption:**

| Particulars | FY 2025-26 | | FY 2024-25 | |
|---|---|---|---|---|
| | Number | Remarks | Number | Remarks |
| Number of complaints received in relation to issues of Conflict of Interest of the Directors | Nil | - | Nil | - |
| Number of complaints received in relation to issues of Conflict of Interest of the KMPs | Nil | - | Nil | - |

7. **Provide details of any corrective action taken or underway on issues related to fines / penalties / action taken by regulators/ law enforcement agencies/ judicial institutions, on cases of corruption and conflicts of interest.**

   Not Applicable

8. **Number of days of accounts payables ((Accounts payable *365) / Cost of goods/services procured) in the following format:**

| | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Number of day of accounts payables | 159 | 221 |

9. **Open-ness of business Provide details of concentration of purchases and sales with trading houses, dealers, and related parties along-with loans and advances & investments, with related parties, in the following format:**

| Parameter | Metrics | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| Concentration of Purchases | a. Purchases from trading houses as % of total purchases | 16 | 26 |
| | b. Number of trading houses where purchases are made from | 57 | 145 |
| | c. Purchases from top 10 trading houses as % of total purchases from trading houses | 85 | 61 |
| Concentration of Sales | a. Sales to dealers / distributors as % of total sales | 100 | 100 |
| | b. Number of dealers / distributors to whom sales are made | 50 | 663 |
| | c. Sales to top 10 dealers / distributors as % of total sales to dealers / distributors | 87 | 40 |
| Share of RPTs in | a. Purchases (Purchases with related parties / Total Purchases) | 73 | 17 |
| | b. Sales (Sales to related parties / Total Sales) | 96 | 90 |
| | c. Loans & advances (Loans & advances given to related parties / Total loans & advances) | 100 | 38 |
| | d. Investments (Investments in related parties / Total Investments made) | 94 | 66 |

### LEADERSHIP INDICATORS

1. **Awareness programmes conducted for value chain partners on any of the Principles during the financial year:**

| Sr.no | Total number of awareness programmes held | Topics / principles covered under the training | %age of value chain partners covered (by value of business done with such partners) under the awareness programmes |
|---|---|---|---|
| 1. | 7 | • Health & Safety topics such as process safety, Industrial hygiene, permit system etc.<br>• Environmental topics such as pollution prevention, renewable energy, effluent treatment etc<br>• Labour rights such as payment of wages, overtime & leaves, etc.<br>• Anti – Corruption<br>• Management system<br>• Scope 3 Emission | 15% |

2. **Does the entity have processes in place to avoid/ manage conflict of interests involving members of the Board? (Yes/No)**

Yes

**If Yes, provide details of the same.**

UPL has established a dedicated Code of Conduct for its board members, reinforcing its commitment to the highest standards of personal and professional integrity. The company expects all Directors and Officers to embody honesty, ethical conduct, and accountability in every aspect of their role, whether within company premises, at offsite locations, during company-sponsored business and social events, or in any setting where they represent UPL. This Code serves as a guiding principle to uphold the organization's values and maintain a culture of trust and responsibility.

The Company has a formal Code of Conduct for BoDs and Senior Management which can be accessed at https://www.upl-ltd.com/corporate_governance_pdfs/bGJF743GF1voLokovbg9KUp5zo6aZgHIIawv33Hx/Code-of-Conduct-for-BoD-and-Senior-Mgmt.pdf.

## PRINCIPLE 2

## BUSINESSES SHOULD PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

### ESSENTIAL INDICATORS

1. **Percentage of R&D and capital expenditure (capex) investments in specific technologies to improve the environmental and social impacts of product and processes to total R&D and capex investments made by the entity, respectively.**

| | FY 2025-26 | FY 2024-25 | Details of improvements in environmental and social impacts |
|---|---|---|---|
| R&D | 1.80% | 0.86% | Please refer Conservation of Energy, Technology Absorption, Adaptation and Foreign Exchange Earnings and Outgo section in this Annual Report. |
| Capex | 5% | 5% | • Investment in renewable energy<br>• Investment in Zero Liquid Discharge<br>• Investment in Hazardous Waste Management System<br>• Investment in Digitisation of Water & Energy Measurements |

2. a. **Does the entity have procedures in place for sustainable sourcing? (Yes/No)**

Yes, We have well defined procedure on Supplier sustainability evaluation. It includes online sustainability evaluation through e procurement tool, On-site audit mechanism and Post-Audit improvement plans. UPL Procurement sustainability program is aligned with UN Global Compact guidelines and ISO 20400 standard. UPL ambitious target is to "achieve at least 70% of sustainable sourcing by 2030". UPL team approached this challenge through user friendly e-procurement tool, automation of sustainability performance scoring, extensive engagement through buyers for completion of tasks and well-defined on-site audit program. Through e-procurement tool, we could maintain Supplier Assessment Questionnaire in multiple languages e.g., Mandarin, Portuguese, English etc. to enable its completion. Automated scoring and supplier classification matrix as customized in the portal helped classify supplier sustainability performance based on Supplier response and Auditor inputs into portal. This automation helped us save lot of time in manual intervention for scoring calculation and maintenance of those records. We could do it at scale as enabled by system. Innovative and clearly defined matrix as implemented in e-procurement tool to automatically classify supplier into any of three buckets of "Leaders", "Sustainable at par with Industry" and "Sensitive" helped us to save time in these calculations. It helped us to devote sufficient time on supplier engagement and implementation tasks. Persistent engagement with supplier organization coupled with positive influence from our buyer team helped to achieve desirable results. Procurement team were backed up by strong team of subject matter experts and IT shared services team to take care of any issues that may arise during these engagements. Sustainable oversight on progress of this program was ensured by defining progress indicators catering to each purchase category team. Sustainability was made part of each Management Performance Reviews within procurement function to create visibility and team leadership support. Internally, progress dashboard was published on weekly basis pertaining to each purchase category to indicate progress in terms of supplier response to online assessment, number of audits scheduled, number of improvement plans agreed etc. Another key challenge that we faced was for arriving at mutually agreed improvement plans with suppliers and in some cases, to educate our supply chain partners. Major challenge was to encourage sustainable practices and guide for improvement for suppliers categorized as Medium and Small Manufacturing Enterprises (MSMEs). We extended special efforts in guiding MSMEs to integrate key sustainability aspects within its operational practices in cost-effective manner. It was done by making available practical guidance tool-kit, guidance engagements and topic specific workshop.

b. **If yes, what percentage of inputs were sourced sustainably?**

43%

3. **Describe the processes in place to safely reclaim your products for reusing, recycling and disposing at the end of life, for**

By embedding sustainability across multiple levels of our operations, UPL is actively working toward a functioning circular economy. This transformation is driven by low-impact practices and innovative, resource-efficient technologies, all centered around a holistic waste management approach focused on minimizing waste generation.

Given the nature of our business activities, we generate both hazardous and non-hazardous waste. However, we have implemented a comprehensive 4R waste strategy Reduce, Reuse, Recycle, and Recover designed to accelerate progress toward our ambitious goal of achieving a 60% reduction in specific waste disposal by 2030. This strategy ensures that sustainability remains integral to our operations while fostering responsible waste management practices.

**Reduce**

- Ensuring the responsible use of raw materials while propagating the ideology of 'waste is wealth' across our business activities
- Optimizing manufacturing operations to achieve waste reduction

**Recycle**

- Encouraging the recycling of packaging material
- Augmenting waste reduction for the packaging process by using appropriate materials
- Recovering value-added products from waste

**Reuse**

- Prolonging the Lifecyle of equipment and products
- Utilizing incinerable hazardous waste for energy recovery

**Reprocess –**

- Process redevelopment/ optimization to reduce
- Landfill/ incinerable waste during operations
- Trading coproducts with neighbors to derive maximum value from by-products/co-products

**(a) Plastics (including packaging)**

In line with plastic waste management rules, we are offsetting 100% of our packaging materials associated with domestic consumers in India through an external agency. The external agency facilitates collection and recycling of plastic waste in a responsible manner.

**(b) E-waste**

Although the quantity of E-waste generation is not significant at UPL, we ensure that all the E-Waste is sent for recycling through an authorized recycler as per E-waste amendment rule.

**(c) Hazardous waste**

Hazardous waste is disposed to Treatment, Storage and Disposal Facilities (TSDF sites) / Common Hazardous Wastes Incineration Facility (CHWIF) based on the characteristics of the waste. In addition to this, suitable wastes are sent for co-processing to cement industries by following Hazardous and Other Waste Management (HOWM) rules requirements.

**(d) Other waste**

Other wastes not falling under hazardous categories are being sold to actual end user or recycler as per the applicability.

4. **Whether Extended Producer Responsibility (EPR) is applicable to the entity's activities (Yes / No).**

Yes

If yes, whether the waste collection plan is in line with the Extended Producer Responsibility (EPR) plan submitted to Pollution Control Boards?

Yes, EPR plan is approved by Central Pollution Control Board.

## LEADERSHIP INDICATORS

**1. Has the entity conducted Life Cycle Perspective / Assessments (LCA) for any of its products (for manufacturing industry) or for its services (for service industry)? If yes, provide details in the following format?**

| NIC Code | Name of Product/ Service | % of total Turnover contributed | Boundary for which the Life Cycle Perspective / Assessment was conducted | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes/ No) | If yes, provide the web-link. |
|---|---|---|---|---|---|---|
| No, the Company has not conducted LCA studies for any of its products. | | | | | | |

**2. If there are any significant social or environmental concerns and/or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means, briefly describe the same along-with action taken to mitigate the same.**

| Name of Product / Service | Description of the risk / concern | Action Taken |
|---|---|---|
| No | | |

**3. Percentage of recycled or reused input material to total material (by value) used in production (for manufacturing industry) or providing services (for service industry).**

We do not currently record this information; however, we are committed to working closely with our supply chain to evaluate and integrate this aspect in the coming years.

**4. Of the products and packaging reclaimed at end of life of products, amount (in metric tonnes) reused, recycled, and safely disposed, as per the following format:**

| | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Re-Used | Recycled | Safely Disposed | Re-Used | Recycled | Safely Disposed |
| Plastics (including packaging) | | 1,346.82 | | - | 3,622 | - |
| E-waste | | 0.06 | | - | 2 | - |
| Hazardous waste | | 3,131.24 | 1,271.09 | - | 36,479 | 1,36,367 |
| Non- Hazardous waste | | 235.77 | | - | 18,689 | 106 |
| **Other waste - NIL** | | | | | | |

**5. Reclaimed products and their packaging materials (as percentage of products sold) for each product category.**

As a company engaged in the production of agrochemicals, our products are consumed during the use phase, and therefore, we do not claim reuse, recycling, or disposal of the products themselves. However, we actively reclaim the plastic packaging associated with our products through the Extended Producer Responsibility (EPR) process. Through this initiative, we successfully recycled 1346 metric tons of plastic packaging material during this reporting year, reinforcing our commitment to sustainability and responsible waste management.

# PRINCIPLE 3

## BUSINESSES SHOULD RESPECT AND PROMOTE THE WELL-BEING OF ALL EMPLOYEES, INCLUDING THOSE IN THEIR VALUE CHAINS

## ESSENTIAL INDICATORS

1. a. **Details of measures for the well-being of employees:**

| Particulars | Total (A) | % of employees covered by | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Health insurance | | Accident insurance | | Maternity Benefits | | Paternity Benefits | | Day Care facilities | |
| | | Number (B) | % (B / A) | Number (C) | % (C / A) | Number (D) | % (D / A) | Number (E) | % (E / A) | Number (F) | % (F / A) |
| Permanent employees | | | | | | | | | | | |
| Male | 508 | 508 | 100 | 508 | 100 | - | - | 508 | 100 | - | - |
| Female | 88 | 88 | 100 | 88 | 100 | 88 | 100 | - | - | - | - |
| **Total** | **596** | **596** | **100** | **596** | **100** | **88** | **100** | **508** | **100** | **-** | **-** |

b. **Details of measures for the well-being of workers:**

| Category | Total (A) | % of workers covered by | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Health insurance | | Accident insurance | | Maternity Benefits | | Paternity Benefits | | Day Care facilities | |
| | | Number (B) | % (B / A) | Number (C) | % (C / A) | Number (D) | % (D / A) | Number (E) | % (E / A) | Number (F) | % (F / A) |
| Permanent workers | | | | | | | | | | | |
| Male | 286 | 286 | 100 | 286 | 100 | - | - | 286 | 100 | - | - |
| Female | - | - | - | - | - | - | - | - | - | - | - |
| **Total** | **286** | **286** | **100** | **286** | **100** | **-** | **-** | **286** | **100** | **-** | **-** |

c. **Spending on measures towards well-being of employees and workers (including permanent and other than permanent) in the following format -**

| | FY 2025-26 | FY 2024-25 |
|---|---|---|
| c. Cost incurred on well-being measures as a % of total revenue of the company | 4% | 5% |

**2. Details of retirement benefits, for Current FY and Previous Financial Year.**

| Benefits | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) | No. of employees covered as a % of total employees | No. of workers covered as a % of total workers | Deducted and deposited with the authority (Y/N/N.A.) |
| PF | 100 | 100 | Yes | 100 | 100 | Yes |
| Gratuity | 100 | 100 | Yes | 100 | 100 | Yes |
| ESI | 0 | 0 | Yes | 0.01 | 0.01 | Yes |
| **Others - Not Applicable** | | | | | | |

**3. Accessibility of workplaces**

Are the premises / offices of the entity accessible to differently abled employees and workers, as per the requirements of the Rights of Persons with Disabilities Act, 2016?

We are committed to maintaining infrastructure that aligns with the latest regulations, ensuring accessibility and inclusivity for all. Our differently abled colleagues receive the necessary support to navigate their work environment comfortably, fostering an inclusive and equitable workplace.

**4. Does the entity have an equal opportunity policy as per the Rights of Persons with Disabilities Act, 2016?**

UPL is deeply committed to fostering equal opportunity and inclusivity, as reflected in its Human Rights Policy and Global Code of Conduct. These guiding policies ensure alignment with the principles set forth in the Rights of Persons with Disabilities Act, 2016, reinforcing UPL's dedication to creating an equitable work environment.

Within its Human Rights Policy, UPL explicitly upholds the values of equal opportunity and non-discrimination—cornerstones of an inclusive workplace. The company is committed to ensuring that individuals with disabilities are treated fairly and provided with meaningful opportunities for employment and career growth. By actively eliminating barriers, UPL cultivates a supportive environment where all employees, including persons with disabilities, can contribute to their fullest potential.

Additionally, UPL's Global Code of Conduct serves as an ethical framework for its workforce, emphasizing dignity, respect, and fairness in all interactions. This Code strictly prohibits discrimination, including any bias based on disability, and champions a workplace that is free from prejudice, fostering a culture of integrity and inclusivity.

If so, provide a web-link to the policy.

UPL's Human Right's Policy can be accessed at:- https://www.upl-ltd.com/images/people/downloads/UPL_Human_Rights_Policy.pdf

UPL's Global Code of Conduct can be accessed at :- https://www.upl-ltd.com/downloads/policies/compliances/UPL_Global_Code_of_Conduct.pdf

**5. Return to work and Retention rates of permanent employees and workers that took parental leave.**

| Gender | Permanent employees | | Permanent workers | |
|---|---|---|---|---|
| | Return to work rate | Retention rate | Return to work rate | Retention rate |
| Male | 100 | 95 | 0 | 0 |
| Female | 100 | 100 | 0 | 0 |
| **Total** | **100** | **95** | **0** | **0** |

*Note- Total is the average of the male & female in respective segment*

**6. Is there a mechanism available to receive and redress grievances for the following categories of employees and worker?**

Yes, UPL's Grievance Redressal Platform where employees can voice their complaints in a constructive way and ensure that their point of view is heard, and the issue effectively resolved, thereby avoiding conflict and misunderstandings.

The company encourages employees to communicate their grievances to foster a supportive and pleasant workplace for everyone. The grievance redressal policy can be accessed at https://www.upl-ltd.com/images/people/downloads/Grievance-Redressal.pdf

**If yes, give details of the mechanism in brief.**

| Segment | Yes/No (If Yes, then give details of the mechanism in brief) | Remark | Remarks |
|---|---|---|---|
| Permanent Workers | UPL's Grievance Redressal Policy is designed to provide employees with a transparent and constructive platform to express concerns and complaints in a fair and consistent manner. By fostering open communication, the policy reinforces UPL's commitment to creating a supportive and inclusive workplace that aligns with its core values of respect, trust, and diversity. It applies to all employees, regardless of position or status, ensuring that grievances related to their work are addressed promptly and equitably to maintain a harmonious work environment.<br>The policy guarantees employees' right to information and outlines clear options for raising grievances. Employees can report concerns to their direct supervisor or the HR department, submit a Grievance Form detailing their issue, decline participation in formal meetings alone, and appeal formal decisions when necessary. Additionally, employees facing allegations have the right to receive a copy of the allegations, respond accordingly, and appeal decisions.<br>UPL is committed to implementing a formal grievance procedure, ensuring its communication to employees, conducting timely investigations, treating all employees equitably, and maintaining confidentiality throughout the process. Wherever possible, the company strives to resolve grievances effectively while upholding its strict no-retaliation policy for employees who file grievances internally or with external agencies.<br>This Grievance Redressal Policy functions in tandem with UPL's Human Rights Policy, reinforcing a culture of dignity and inclusivity. By offering a structured mechanism for grievance resolution, UPL ensures employees feel heard, supported, and empowered in their workplace. | | Our policy is applicable to all our employees |
| Other than Permanent Workers | | | |
| Permanent Employees | | | |
| Other than Permanent Employees | | | |

**7. Membership of employees and worker in association(s) or Unions recognized by the listed entity:**

There are no associations of workers/employees.

**8. Details of training given to employees and workers:**

| Category | FY 2025-26 | | | | | FY 2024-25 | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | On Health and safety measures | | On Skill upgradation | | Total (D) | On Health and safety measures | | On Skill upgradation | |
| | | No. (B) | % (B / A) | No. (C) | % (C / A) | | No. (E) | % (E / D) | No. (F) | % (F / D) |
| **Employees** | | | | | | | | | | |
| Male | 508 | 437 | 86 | 422 | 83 | 3,327 | 3240 | 97 | 3,094 | 93 |
| Female | 88 | 78 | 89 | 68 | 77 | 369 | 350 | 95 | 340 | 92 |
| **Total** | **596** | **515** | **86** | **490** | **82** | **3,696** | **3,590** | **97** | **3,494** | **93** |
| **Workers** | | | | | | | | | | |
| Male | 286 | 286 | 100 | 286 | 100 | 2753 | 2680 | 97 | 2680 | 97 |
| Female | - | - | - | - | - | 11 | 8 | 73 | 8 | 73 |
| **Total** | **286** | **286** | **100** | **286** | **100** | **2,764** | **2,688** | **97** | **2,688** | **97** |

**9. Details of performance and career development reviews of employees and worker:**

| Category | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Total (A) | No. (B) | % (B / A) | Total (C) | No. (D) | % (D / C) |
| **Employees** | | | | | | |
| Male | 508 | 480 | 94 | 3,327 | 2,828 | 85 |
| Female | 88 | 83 | 94 | 369 | 274 | 74 |
| **Total** | **596** | **563** | **94** | **3,696** | **3,102** | **84** |
| **Workers** | | | | | | |
| Male | 286 | 271 | 95 | 2,753 | 2,432 | 88 |
| Female | - | - | - | 11 | 7 | 64 |
| **Total** | **286** | **271** | **95** | **2,764** | **2,439** | **88** |

**a. Whether an occupational health and safety management system has been implemented by the entity? (Yes/ No).**

Yes, EHS policy is available stating OH&S management system for all (employees, workers) As per GFR 1963 & ISO 45001-2018. All our sites are ISO 45001:2018 certified and OH&S management system has been implemented confirming to this standard.

On roll employees and identified employees on third party roll are responsible for implementation for occupational health and safety management system. In addition to this, on need basis we also hire subject experts/consultants for the OHSE management system.

On the basis of leading and lagging indicator performance, MIS, Incident investigation reports, ISO audits, customer audits, Statutory bodies audits. Second and 3rd party audit. Yearly objectives and targets are decided based on last year's performance of the OHSE management system by the organization.

**If yes, the coverage such system?**

All workers, activities, and workplaces are covered by the occupational health and safety management system.

**b. What are the processes used to identify work-related hazards and assess risks on a routine and non-routine basis by the entity?**

Our approach to hazard identification is comprehensive, utilizing a range of tools to assess risks, formulate strategic mitigation plans, and verify the effectiveness of implementation measures. A dedicated cross-functional team oversees every aspect of hazard identification and mitigation, ensuring a well-structured and proactive safety management framework that reflects our commitment to workplace safety and operational excellence.

Tools used to identify Risks and Hazards;

- Activity based hazard identification & risk analysis (HIRA)
- Man chemical interface
- Man machine interface

- 3 stage hazard & operability studies (HAZOP)
- Job safety analysis (JSA)

Implementation and verification of mitigation plans;

- Implementation of mitigation plans for identified root causes
- This is followed by the field verification of the implementation of mitigation plans through safety audits, Gemba round, Pre-Start Up Safety Review (PSSR)

Further to this, we have processes like Job Safety Analysis, Standard operating Procedures, Work instructions, permit to work, daily safety talk, learning from incidents & horizontal deployment of CAPAs across sites, capturing of Unsafe Actions/ Unsafe Conditions, internal safety audits, safety inspections for ensuring safety at work place.

**c. Whether you have processes for workers to report the work-related hazards and to remove themselves from such risks. (Y/N)**

At UPL, workforce safety is our top priority, and we implement comprehensive control measures to ensure a secure workplace. We recognize that seriousness and transparency are fundamental to fostering a strong safety culture, which is why our management actively engages with different employee groups to raise awareness about workplace safety. These interactions cultivate an environment where employees feel empowered to report concerns without fear, enabling timely action against identified work-related hazards.

Additionally, we conduct regular health checkups focused on specific parameters, allowing us to proactively identify unsafe conditions for employees working in designated zones. Through these ongoing initiatives, UPL continues to strengthen workplace safety, ensuring the well-being of its workforce.

**d. Do the employees/ worker of the entity have access to non-occupational medical and healthcare services? (Yes/ No)**

UPL ensures comprehensive healthcare coverage for its workforce. All contract workers are covered under the Employee State Insurance Corporation (ESIC) policy, while company employees benefit from Mediclaim coverage. Additionally, UPL has established partnerships with nearby hospitals to provide regular outpatient department (OPD) facilities, ensuring accessible and continuous healthcare support for all workers

**11. Details of safety related incidents, in the following format:**

| Safety Incident/Number | Category | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked) | Employees | 0.00 | 0.10 |
| | Workers | 0.18 | 0.08 |
| Total recordable work-related injuries | Employees | 0 | 1 |
| | Workers | 1 | 2 |
| No. of fatalities | Employees | 0 | 0 |
| | Workers | 0 | 0 |
| High consequence work-related injury or ill-health (excluding fatalities) | Employees | 0 | 0 |
| | Workers | 0 | 0 |

**12. Describe the measures taken by the entity to ensure a safe and healthy workplace.**

At UPL, we are unwavering in our commitment to fostering a safe and healthy workplace for all employees. We prioritize the well-being and rights of our workforce, guided by key policies such as the HSE (Health, Safety, and Environment) Policy, Human Rights Policy and Global Code of Conduct. These policies form the foundation of our efforts to create a conducive and responsible work environment.

We adhere to stringent health and safety standards, implementing proactive systems and procedures designed to prevent accidents, injuries, and occupational hazards. Regular training and awareness programs empower employees with the knowledge and skills necessary to uphold workplace safety, fostering a culture where precaution and vigilance are prioritized.

By aligning our practices with these policies, we ensure that the well-being, rights, and voices of our employees are consistently valued and protected. Through continuous improvement and engagement, we work toward a workplace culture that promotes overall health, safety, and welfare.

To further reinforce workplace safety, we have a well-defined incident investigation management process. Recommended corrective actions stemming from root cause analyses (RCA) of all incidents, including near-miss cases are swiftly implemented to maintain a secure work environment. Additionally, a structured reporting mechanism for unsafe acts (UA) and unsafe conditions (UC) is in place, with clearly defined protocols to ensure timely resolution and closure of observations.

**13. Number of Complaints on the following made by employees and workers:**

| | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Working Conditions | 0 | 0 | Employees are encouraged to give suggestions on improvements for quality, safety, environment, productivity and Morale through Kaizen and PokaYoke. Also, through reporting safety observations and Near miss. | 0 | 0 | |
| Health & Safety | 0 | 0 | Employees are encouraged to give suggestions on improvements for quality, safety, environment, productivity and Morale through Kaizen and PokaYoke. Also through reporting safety observations and Near miss. | 0 | 0 | |

**14. Assessments for the year:**

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|---|---|
| Health and safety practices | 100%. All our occupational health and safety management systems are ISO 45000:2018 certified. We conduct both internal and external audits on periodic basis to evaluate our current practices and improve further based on observations and feedback from respective stakeholders |
| Working Conditions | 100%, All our manufacturing plant & offices were assessed for ISO 45000:2018 OH&S certification by third party agencies as per Occupational Safety, Health and Working Conditions Code, 2020 |

**15. Provide details of any corrective action taken or underway to address safety-related incidents (if any) and on significant risks / concerns arising from assessments of health & safety practices and working conditions.**

Based on operational requirements, UPL regularly engages external expert agencies to strengthen its safety culture, driving transformation and improvement across sites. This safety transformation journey focuses on capability building across multiple critical workstreams, including Process Safety Management, Incident Investigation, Behavioral Intervention, Competence Development, Contractor Safety Management, and the continuous review and enhancement of management process standards for key activities.

By leveraging industry expertise, UPL ensures the ongoing evolution of safety practices, fostering a proactive and resilient safety culture within its operations.

## LEADERSHIP INDICATORS

**1. Does the entity extend any life insurance or any compensatory package in the event of death of**

a. Employees (Y/N)

Yes

b. Workers (Y/N).

Yes

**2. Provide the measures undertaken by the entity to ensure that statutory dues have been deducted and deposited by the value chain partners.**

UPL has established a robust mechanism to ensure the regular monitoring and submission of all statutory dues to regulatory authorities. For our value chain partners, we conduct monthly assessments of regulatory dues, collecting the necessary supporting evidence to maintain compliance and transparency

3. **Provide the number of employees / workers having suffered high consequence work-related injury / ill-health / fatalities (as reported in Q11 of Essential Indicators above), who have been are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment:**

| Category | Total no. of affected employees/ workers | | No. of employees/workers that are rehabilitated and placed in suitable employment or whose family members have been placed in suitable employment | |
|---|---|---|---|---|
| | FY 2025-26 | FY 2024-25 | FY 2025-26 | FY 2024-25 |
| Employees | 0 | 1 | 0 | 0 |
| Workers | 1 | 2 | 0 | 0 |

4. **Does the entity provide transition assistance programs to facilitate continued employability and the management of career endings resulting from retirement or termination of employment? (Yes/ No)**

Please refer to 'employee training and skill development' section of our Annual Report for FY 25-26.

5. **Details on assessment of value chain partners:**

| | % of value chain partners (by value of business done with such partners) that were assessed |
|---|---|
| Health and safety practices | 68% |
| Working Conditions | 68% |

6. **Provide details of any corrective actions taken or underway to address significant risks / concerns arising from assessments of health and safety practices and working conditions of value chain partners.**

We had total 4 on-site audits across our key suppliers in India which generated 58 Critical & Major findings. Out of these, 10 improvement actions are closed.

## PRINCIPLE 4

## BUSINESSES SHOULD RESPECT THE INTERESTS OF AND BE RESPONSIVE TO ALL ITS STAKEHOLDERS

### ESSENTIAL INDICATORS

1. **Describe the processes for identifying key stakeholder groups of the entity.**

At UPL, we take a comprehensive and strategic approach to identifying and prioritizing key stakeholder groups that are essential to our business. We recognize those stakeholders, whether individuals or entities, have a vested interest in our organization and can significantly influence or be affected by our operations, decisions, and outcomes. By proactively engaging with these stakeholders, we ensure alignment with their expectations while fostering collaborative and mutually beneficial relationships.

To identify key stakeholder groups, we consider several factors:

1. **Influence:** We assess the level of influence a stakeholder group holds over our business. This includes their ability to shape our strategies, policies, and decision-making processes. Stakeholders with higher influence are given greater consideration in our prioritization.
2. **Interdependency:** We analyze the degree of interdependence between our organization and different stakeholder groups. This involves understanding the extent to which their actions, resources, or support are necessary for our success. Stakeholders with whom we have strong interdependencies are identified as key stakeholders.
3. **Responsibility:** We evaluate the responsibility that stakeholder groups have towards our organization and vice versa. This includes their ethical, legal, or contractual obligations, as well as their contribution to our overall goals and objectives. Stakeholders who bear significant responsibility are recognized as key stakeholders.

By considering these factors, we can effectively identify the stakeholder groups that have the most significant impact on our business. This strategic approach helps us prioritize our engagement efforts and allocate resources appropriately to nurture relationships with these key stakeholders.

2. **List stakeholder groups identified as key for your entity and the frequency of engagement with each stakeholder group.**

| Stakeholder Group | Whether identified as Vulnerable & Marginalized Group (Yes/No) | Channels of communication (Email, SMS, Newspaper, Pamphlets, Advertisement, Community Meetings, Notice Board, Website), Other | Frequency of engagement (Annually/ Half yearly/ Quarterly / others - please specify) | Purpose and scope of engagement including key topics and concerns raised during such engagement |
|---|---|---|---|---|
| Top management | No | • Board meetings<br>• Annual General Meeting (AGM) | • Quarterly, need-basis<br>• Annually | • Occupational health and safety<br>• Water and hazardous waste management<br>• Climate change<br>• Demand risk<br>• Responsible management of information in the public domain |
| Permanent employees | No | • Employee satisfaction survey<br>• National townhall meetings<br>• Telephone and e-mails<br>• Virtual meetings<br>• Magazines and newsletters<br>• Mid-year and annual review | • Weekly<br>• Monthly<br>• Quarterly<br>• Yearly<br>• Need Basis | • Increased awareness of all employees on UPL's policies<br>• Strategic skill up-gradation programs<br>• Lateral deployment<br>• Enhanced Standard Operating Procedures (SOP) and system implementation |
| Contractual employees | No | • Townhall meetings<br>• Email<br>• Virtual webinars<br>• Employee satisfaction survey<br>• Organised training and information sessions<br>• Team-building events | • Weekly<br>• Monthly<br>• Need Basis | • Reward and recognition programs<br>• Strategic implementation of IT initiatives<br>• Ethical business practice |
| Regulators | No | • One-on-one meetings | • Quarterly | • Environmental compliance |
| Suppliers and vendors | No | • Supplier engagement forums<br>• Virtual trainings<br>• Supplier events | • Quarterly<br>• Yearly<br>• Need Basis | • Delay in payments<br>• Cancellation of orders<br>• Enhanced sustainable growth |
| Customers | No | • Telephonic and e-mails<br>• Executive announcements<br>• Meetings with clients and managers | • Daily<br>• Weekly<br>• Monthly<br>• Need Basis | • Delayed delivery of products<br>• Increased customer engagement |
| Academia | No | • Virtual meetings<br>• E-mails | • Monthly<br>• Quarterly<br>• Yearly<br>• Need Basis | • Sustainable agro-product portfolio of UPL<br>• Increased employment of technical experts<br>• Enhanced R&D practices in conjunction with learning and development initiatives for students |
| Local community | Yes | • Group meetings<br>• One-on-one meetings<br>• Impact assessments | • Monthly<br>• Quarterly<br>• Need Basis | • Educational infrastructure<br>• Health and sanitation<br>• Self-help groups<br>• Agricultural techniques |
| Shareholders | No | • Annual Reports<br>• Stock Exchange Intimations<br>• Press Releases<br>• Investor Meetings<br>• Conference Calls | • Quarterly<br>• Annually<br>• Need Basis | • Revenue growth<br>• Profits<br>• Sustainability |

## LEADERSHIP INDICATORS

1. **Provide the processes for consultation between stakeholders and the Board on economic, environmental, and social topics or if consultation is delegated, how is feedback from such consultations provided to the Board.**

   At UPL, we ensure effective consultation between stakeholders and the Board on economic, environmental, and social topics through a well-defined process:

   1. **HOD Engagement:** Heads of Departments (HODs) engage with stakeholders to understand ESG impacts and gather feedback.
   2. **Identification of Improvement Areas:** HODs identify key improvement areas based on stakeholder interactions.
   3. **Executive Sustainability Committee:** HODs communicate concerns, opportunities, and improvement areas to the Executive Sustainability Committee
   4. **Evaluation and Feedback:** The Executive Sustainability Committee assesses implications and provides feedback.
   5. **Communication to the Board:** The Executive Sustainability Committee presents findings to the Board's Sustainability Committee.
   6. **Board Inputs:** The Board's Sustainability Committee offers guidance and inputs based on their expertise.

   By following this process, we ensure that stakeholder consultations on economic, environmental, and social topics are effectively integrated into our decision-making and governance structures. The feedback received from these consultations plays a vital role in shaping our sustainability initiatives, enhancing stakeholder relationships, and driving positive change throughout our organization

2. **Whether stakeholder consultation is used to support the identification and management of environmental, and social topics (Yes / No).**

   Yes

   If so, provide details of instances as to how the inputs received from stakeholders on these topics were incorporated into policies and activities of the entity.

   Stakeholder consultation is a fundamental part of our approach to identifying and managing environmental and social topics. We actively seek feedback from both internal and external stakeholder groups, recognizing the importance of understanding their perspectives and concerns. Through meaningful engagement, we gain valuable insights into how our business impacts various stakeholder groups and how they, in turn, shape our operations.

   This collaborative approach ensures that our decision-making process remains informed, transparent, and responsive to stakeholder expectations. For a detailed overview of our stakeholder engagement practices and the material topics we address, please refer to the dedicated materiality section in our latest sustainability report.

3. **Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.**

   UPL is committed to empowering vulnerable and marginalized stakeholder groups, particularly local communities. Through active engagement and strategic partnerships with local NGOs, we address their specific needs and challenges, ensuring targeted support and meaningful impact.

   Our initiatives focus on key areas such as agricultural education to improve farming techniques, support for children's education to provide them with quality learning opportunities and brighter futures, and nature conservation to protect the environment and essential resources for these communities. By implementing these programs, we strive to foster sustainable development and create a more inclusive and equitable society.

   For detailed examples of our engagement and impact, please refer to the Corporate Social Responsibility (CSR) section of our latest report, which showcases case studies and projects that highlight our efforts in supporting vulnerable stakeholder groups.

# PRINCIPLE 5

## BUSINESSES SHOULD RESPECT AND PROMOTE HUMAN RIGHTS

## ESSENTIAL INDICATORS

1. **Employees and workers who have been provided training on human rights issues and policy(ies) of the entity, in the following format:**

| Category | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Total (A) | No. of employees/ workers covered (B) | % (B / A) | Total (C) | No. of employees/ workers covered (D) | % (D / C) |
| **Employees** | | | | | | |
| Permanent | 596 | 596 | 100 | 3,696 | 3,696 | 100 |
| **Total Employees** | **596** | **596** | **100** | **3,696** | **3,696** | **100** |
| **Workers** | | | | | | |
| Permanent | 286 | 286 | 100 | 2,764 | 2,764 | 100 |
| **Total Workers** | **286** | **286** | **100** | **2,764** | **2,764** | **100** |

2. **Details of minimum wages paid to employees and workers, in the following format:**

| Category | FY 2025-26 | | | | | FY 2024-25 | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | Total (A) | Equal to Minimum Wage | | More than Minimum Wage | | Total (D) | Equal to Minimum Wage | | More than Minimum Wage | |
| | | No. (B) | % (B / A) | No. (C) | % (C / A) | | No. (E) | % (E / D) | No. (F) | % (F / D) |
| **Employees** | | | | | | | | | | |
| **Permanent** | | | | | | | | | | |
| Male | 508 | 115 | 23 | 393 | 77 | 3327 | 2267 | 68 | 1060 | 32 |
| Female | 88 | 17 | 19 | 71 | 81 | 369 | 233 | 63 | 136 | 37 |
| **Workers** | | | | | | | | | | |
| **Permanent** | | | | | | | | | | |
| Male | 286 | 248 | 87 | 38 | 13 | 2753 | 2611 | 95 | 142 | 5 |
| Female | - | - | - | - | - | 11 | 9 | 82 | 2 | 18 |

3. **Details of remuneration/salary/wages, in the following format:**

   a. **Median remuneration / wages:**

| | Male | | Female | |
|---|---|---|---|---|
| | Number | Median remuneration/ salary/ wages of respective category | Number | Median remuneration/ salary/ wages of respective category |
| Board of Directors (BoD) | 7 | 71,40,000 | 3 | 67,20,000 |
| Key Managerial Personnel (KMP) | 2 | 6,34,44,435 | 0 | - |
| Employees other than BoD and KMP | 505 | 4,36,356 | 88 | 5,41,932 |
| Workers | 286 | 1,88,220 | - | - |

   b. **Gross wages paid to females as % of total wages paid by the entity, in the following format:**

| | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Gross wages paid to females as % of total wages | 10% | 5.22% |

4. **Do you have a focal point (Individual/ Committee) responsible for addressing human rights impacts or issues caused or contributed to by the business? (Yes/No)**

   UPL is committed to fostering a secure and inclusive work environment that is free from any violations of human rights. To uphold this commitment, human rights concerns are reviewed by the POSH Committee at UPL, ensuring strict adherence to ethical workplace practices.

A well-established Internal Complaints Committee (ICC), consisting of representatives from both genders and an impartial third party, is actively functioning to address and redress human rights-related complaints. Additionally, subcommittees at unit locations reinforce compliance with this policy, ensuring a workplace that remains fair, unbiased, and free from prejudices

5. **Describe the internal mechanisms in place to redress grievances related to human rights issues.**

UPL is committed to ensuring that all stakeholders affected by our activities have access to an effective grievance mechanism. Our Human Rights Policy is closely aligned with UPL's Global Code of Conduct, which establishes a structured process for stakeholders to raise concerns and seek resolution for potential violations.

We uphold a strict non-retaliation policy, ensuring that no employee faces repercussions for reporting grievances. The company diligently investigates, addresses, and responds to stakeholder concerns, taking appropriate corrective actions to resolve any violations.

To facilitate transparent and timely resolution, our grievance cell grievance@upl-ltd.com is accessible to all stakeholders, providing a responsive and sensitive platform for addressing issues with urgency.

6. **Number of Complaints on the following made by employees and workers:**

| | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Filed during the year | Pending resolution at the end of year | Remarks | Filed during the year | Pending resolution at the end of year | Remarks |
| Sexual Harassment | 0 | 0 | - | 2 | 1 | - |
| Discrimination at workplace | 0 | 0 | - | 0 | 0 | - |
| Child Labour | 0 | 0 | - | 0 | 0 | - |
| Forced Labour/Involuntary Labour | 0 | 0 | - | 0 | 0 | - |
| Wages | 0 | 0 | - | 0 | 0 | - |
| Other human rights related issues | 0 | 0 | - | 0 | 0 | - |

7. **Complaints filed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the following format:**

| | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Total Complaints reported under Sexual Harassment on of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH) | 0 | 2 |
| Complaints on POSH as a % of female employees / workers | 0 | 0.54% |
| Complaints on POSH upheld | 0 | 1 |

8. **Mechanisms to prevent adverse consequences to the complainant in discrimination and harassment cases.**

UPL has established a strong Internal Complaints Committee (ICC) to address human rights-related concerns and uphold workplace integrity. We foster a culture where employees and stakeholders can raise issues freely, without fear of retaliation. The ICC is dedicated to investigating, addressing, and resolving concerns while ensuring appropriate corrective actions are taken in response to any identified violations.

Furthermore, we are committed to safeguarding the rights of complainants. Under our policy, no employee will face reprisals for raising genuine concerns, reinforcing our commitment to transparency, fairness, and a respectful work environment

9. **Do human rights requirements form part of your business agreements and contracts? (Yes/No)**

UPL integrates its Human Rights Policy into standard business agreements, ensuring that all business partners adhere to these principles. In addition, we conduct a comprehensive ESG audit before onboarding new partners, which includes a thorough verification of human rights parameters. This approach reinforces our commitment to ethical business practices and sustainability while fostering accountability within our value chain

10. **Assessments for the year:**

| | % of your plants and offices that were assessed (by entity or statutory authorities or third parties) |
|---|---|
| Child labour | 100% |
| Forced/involuntary labour | 100% |
| Sexual harassment | 100% |
| Discrimination at workplace | 100% |
| Wages | 100% |
| Others - please specify | NA |

11. **Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 9 above.**

All the necessary corrective actions were taken in place to ensure the human rights is maintained at our workplace. Further we can find the human details at our company website and the link for the same is https://www.upl-ltd.com/sustainability/people-development/human-rights

## LEADERSHIP INDICATORS

1. **Details of a business process being modified / introduced as a result of addressing human rights grievances/ complaints.**

Please refer the answer to question no. 2

2. **Details of the scope and coverage of any Human rights due-diligence conducted.**

With Human Rights Assessments and the associated due diligence being sensitive matters, at UPL, we have set in place mechanisms, and regional / international commissions to act on any instances of violation swiftly, and with all necessary confidentiality.

Our assessment methodology involved pre-planning and scoping across major locations of our operations, third parties, and JVs across India and overseas which involves various representatives such as:

- Senior Management
- Cross functional employee in different cadres
- Contractors in skilled, semi-skilled & unskilled categories
- Security staff
- Third party manufacturers

This cross-hierarchy, broad-based information gathering helped us identify and map our Human Rights landscape – i.e. the nature and extent of potential risks linked to our activities. We focused on 8 major aspects.

- Child labour
- Discrimination
- The right of Freedom of Association and Collective Bargaining
- Fair Remuneration
- Fair Working Hours
- Occupational Health and Safety
- Bonded Labour
- Workers Involvement and Protection of Human Rights

For further details, please refer our website - - https://www.upl-ltd.com/sustainability/people-development/human-rights

3. **Is the premise/office of the entity accessible to differently abled visitors, as per the requirements of the Rights of Persons with Disabilities Act, 2016?**

Yes, the office's infrastructure is as per the requirements in the Act.

4. **Details on assessment of value chain partners:**

| | % of value chain partners (by value of business done with such partners) that were assessed |
|---|---|
| Child labour | 68% |
| Forced/involuntary labour | 68% |
| Sexual harassment | 68% |
| Discrimination at workplace | 68% |
| Wages | 68% |
| Others - please specify (Anti-Corruption) | 68% |

5. **Provide details of any corrective actions taken or underway to address significant risks / concerns arising from the assessments at Question 4 above.**

We had total 4 on-site audits across our key suppliers in India which generated 58 Critical & Major findings. Out of these, 10 improvement actions are closed.

## PRINCIPLE 6

## BUSINESSES SHOULD RESPECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT

### ESSENTIAL INDICATORS

1. **Details of total energy consumption (in Joules or multiples) and energy intensity, in the following format:**

| Parameter | Please specify unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| **From renewable sources** | | | |
| Total electricity consumption (A) | Gigajoules (GJ) | 28,021 | 6,50,674 |
| Total fuel consumption (B) | Gigajoules (GJ) | 0 | 33,007 |
| Energy consumption through other sources (C) | Gigajoules (GJ) | 0 | 0 |
| **Total energy consumed from renewable sources (A+B+C)** | Gigajoules (GJ) | **28,021** | **6,83,681** |
| **From non-renewable sources** | | | |
| Total electricity consumption (D) | Gigajoules (GJ) | 54,593 | 7,22,649 |
| Total fuel consumption (E) | Gigajoules (GJ) | 79,904 | 73,71,708 |
| Energy consumption through other sources (F) (Steam Purchase) | Gigajoules (GJ) | 16,263 | 1,35,296 |
| **Total energy consumed from non-renewable sources (D+E+F)** | Gigajoules (GJ) | **1,50,760** | **82,29,652** |
| **Total energy consumed (A+B+C+D+E+F)** | Gigajoules (GJ) | **1,78,781** | **89,13,333** |
| **Energy intensity per rupee of turnover** (Total energy consumed / Revenue from operations) | Joules or multiples | 0.0000031 | 0.000078 |
| **Energy intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)** (Total energy consumed / Revenue from operations adjusted for PPP)) | Gigajoules (GJ) | 0.000063 | 0.00160 |
| **Energy intensity in terms of physical output** | Gigajoules (GJ)/MT | 2.14 | 12.03 |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes

**If yes, name of the external agency.**

We have got all our data points pertaining to environment assured by our Third-party Assurer i.e. TUV SUD for FY 25-26



2. **Does the entity have any sites / facilities identified as designated consumers (DCs) under the Performance, Achieve and Trade (PAT) Scheme of the Government of India? (Y/N)**

No

3. **Provide details of the following disclosures related to water, in the following format:**

| Parameter | Please specify unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| **Water withdrawal by source (in kilolitres)** | | | |
| (i) Surface water | kilolitres | 0 | 11,728 |
| (ii) Groundwater | kilolitres | 3,367 | 93,275 |
| (iii) Third party water | kilolitres | 47,204 | 40,36,643 |
| (iv) Seawater / desalinated water | kilolitres | - | - |
| (v) Others (Rainwater) | kilolitres | 0 | 15,926 |
| Total volume of water withdrawal (in kilolitres) (i + ii + iii + iv + v) | kilolitres | 50,571 | 41,57,573 |
| Total volume of water consumption (in kilolitres) | kilolitres | 50,571 | 27,75,881 |
| Water intensity per rupee of turnover (Water consumed / turnover) | kilolitres | 0.0000009 | 0.000024 |
| Water intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)(Total water consumption / Revenue from operations adjusted for PPP) | kilolitres | 0.00002 | 0.00050 |
| Water intensity in terms of physical output | kilolitres | 0.605 | 5.61 |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes

**If yes, name of the external agency.**

We have got all our data points pertaining to environment assured by our Third-party Assurer i.e. TUV SUD for FY 25-26

4. **Provide the following details related to water discharged:**

| Destination | Unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| **Water discharge by destination and level of treatment (in kilolitres)** | | | |
| (i) To Surface water | kilolitres | 0 | 426 |
| - No treatment | kilolitres | | - |
| - With treatment - please specify level of treatment (Tertiary Treatment) | kilolitres | | 426 |
| (ii) To Groundwater | kilolitres | 0 | - |
| - No treatment) | kilolitres | | - |
| - With treatment - please specify level of treatment | kilolitres | | - |
| (iii) To Seawater | kilolitres | 0 | 10,01,232 |
| - No treatment | kilolitres | | - |
| - With treatment - please specify level of treatment (Tertiary Treatment) | kilolitres | | 10,01,232 |
| (iv) Sent to third-parties (Common Effluent Treatment Plant (CETP) | kilolitres | 0 | 3,80,033 |
| - No treatment | kilolitres | | - |
| - With treatment - please specify level of treatment (Tertiary Treatment) | kilolitres | 0 | 3,80,033 |
| (v) Others | kilolitres | | - |
| - No treatment | kilolitres | - | - |
| - With treatment - please specify level of treatment | kilolitres | - | - |
| **Total water discharged (in kilolitres)** | kilolitres | **0** | **13,81,692** |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes

**If yes, name of the external agency.**

We have got all our data points pertaining to environment assured by our Third-party Assurer i.e. TUV SUD for FY 25-26.

5. **Has the entity implemented a mechanism for Zero Liquid Discharge?**

Yes

**If yes, provide details of its coverage and implementation.**

100% of our manufacturing sites are under Zero Liquid Discharge.

6. **Please provide details of air emissions (other than GHG emissions) by the entity, in the following format:**

| Parameter | Please specify unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| NOx | MT/Year | 0.426 | 436 |
| SOx | MT/Year | 0.094 | 121 |
| Particulate matter (PM) | MT/Year | 0.292 | 343 |
| Persistent organic pollutants (POP) | - | NA | NA |
| Volatile organic compounds (VOC) | - | NA | NA |
| Hazardous air pollutants (HAP) | - | NA | NA |
| **Others - Not applicable** | | | |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes

**If yes, name of the external agency.**

We have got all our data points pertaining to the environment assured by our Third-party Assurer i.e. TUV SUD for FY 25-26.

7. **Provide details of greenhouse gas emissions (Scope 1 and Scope 2 emissions) & its intensity, in the following format:**

| Parameter | Unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| Total Scope 1 emissions ( Break-up of the GHG into CO 2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes | 4,589 | 6,57,111 |
| Total Scope 2 emissions ( Break-up of the GHG into CO 2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | Metric tonnes | 12,701 | 1,60,730 |
| Total Scope 1 and Scope 2 emissions per rupee of turnover | | 0.0000002 | 0.000007 |
| Total Scope 1 and Scope 2 emission intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP) (Total Scope 1 and Scope 2 GHG emissions / Revenue from operations adjusted for PPP) | | 0.0000045 | 0.000148 |
| Total Scope 1 and Scope 2 emission intensity in terms of physical output | | 0.207 | 1.10 |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes

**If yes, name of the external agency.**

We have got all our data points pertaining to environment assured by our Third-party Assurer i.e. TUV SUD for FY 25-26.

8. **Does the entity have any project related to reducing Green House Gas emission?**

Yes,

**If Yes, then provide details.**

At Unit 3& 26, we have Interconnection of SPD Chille in which the loading pattern of all chillers, a 3-inch chilled water supply and return line was installed to interconnect SPD's 350TR chiller. This allowed SPD's chiller to support the cooling load, enabling shutdown of the other two chillers & their auxiliaries which lead to the energy saving of 827820 kWh and $CO_2$ emission reduction of 588 MT.

9. **Provide details related to waste management by the entity, in the following format:**

| Parameter | Parameter | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| **Total Waste generated (in metric tonnes)** | | | |
| Plastic waste (A) | metric tonnes | 1,346.82 | 3,622.40 |
| E-waste (B) | metric tonnes | 0.06 | 1.52 |
| Bio-medical waste (C) | metric tonnes | 0.01 | 0.28 |
| Construction and demolition waste (D) | metric tonnes | 0 | 255 |
| Battery waste (E) | metric tonnes | 6.53 | 69 |
| Radioactive waste (F) | metric tonnes | NA | NA |
| Other Hazardous waste. Please specify, if any. (G) | metric tonnes | 5,075 | 1,60,855 |
| Other Non-hazardous waste generated (H). Please specify, if any. (Break-up by composition i.e. by materials relevant to the sector) (Scrap Material) | metric tonnes | 236 | 18,793 |
| **Total (A+B + C + D + E + F + G + H)** | metric tonnes | **6,664** | **1,83,596** |
| **Waste intensity per rupee of turnover** (Total waste generated / Revenue from operations) | metric tonnes | 0.0000001 | 0.000002 |
| **Waste intensity per rupee of turnover adjusted for Purchasing Power Parity (PPP)** (Total waste generated / Revenue from operations adjusted for PPP) | metric tonnes | 0.0000024 | 0.000033 |
| **Waste intensity in terms of physical output** | | 0.07 | 0.25 |
| **For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations (in metric tonnes)** | | | |
| **Category of waste** | | | |
| (i) Recycled | metric tonnes | 4,720 | 58,860 |
| (ii) Re-used | metric tonnes | - | - |
| (iii) Other recovery operations | metric tonnes | - | - |
| **Total** | metric tonnes | **4,720** | **58,860** |
| **For each category of waste generated, total waste disposed by nature of disposal method (in metric tonnes)** | | | |
| **Category of waste** | | | |
| (i) Incineration | metric tonnes | 1,019 | 5,411 |
| (ii) Landfilling | metric tonnes | 252 | 1,10,051 |
| ((iii) Other disposal operations (MEE) | metric tonnes | 673 | 9,273 |
| **Total** | metric tonnes | **1,944** | **1,24,735** |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes

**If yes, name of the external agency.**

We have got all our data points pertaining to environment assured by our Third-party Assurer i.e. TUV SUD for FY 25-26.

10. **Briefly describe the waste management practices adopted in your establishments. Describe the strategy adopted by your company to reduce usage of hazardous and toxic chemicals in your products and processes and the practices adopted to manage such wastes.**

Embedding sustainability through multiple levels of operations, we also aim to adapt to a functioning circular economy. This is largely enabled by low-impact practices, innovative resource efficient technology, driven by a clear focus towards reducing waste generation through our holistic approach in waste management. We tend to generate both hazardous and non-hazardous waste, given the nature of our business activities, but have also established a 4R waste strategy, aiming to accelerate progress towards our goal of a 60% reduction in specific waste disposal by 2030.

**11. If the entity has operations/offices in/around ecologically sensitive areas (such as national parks, wildlife sanctuaries, biosphere reserves, wetlands, biodiversity hotspots, forests, coastal regulation zones etc.) where environmental approvals / clearances are required, please specify details in the following format:**

| S. No. | Location of operations/offices | Type of operations | Whether the conditions of environmental approval / clearance are being complied with? (Y/N) | If no, the reasons there of and corrective action taken, if any. |
|---|---|---|---|---|
| 1 | Unit-3, Ankleshwar | Manufacturing | Y | NA |
| 2 | Unit-08, Jammu | Manufacturing | Y | NA |
| 3 | Unit-13, Dahej | Manufacturing | Y | NA |

**12. Details of environmental impact assessments of projects undertaken by the entity based on applicable laws, in the current financial year:**

| Name and brief details of project | EIA Notification No. | Date | Whether conducted by independent external agency (Yes / No) | Results communicated in public domain (Yes / No) | Relevant Web link |
|---|---|---|---|---|---|
| We have not undertaken Environmental Impact Assessment Studies for any unit for FY 2025-26 | | | | | |

**13. Is the entity compliant with the applicable environmental law/ regulations/ guidelines in India; such as the Water (Prevention and Control of Pollution) Act, Air (Prevention and Control of Pollution) Act, Environment protection act and rules thereunder (Y/N).**

Yes, we proactively monitor the changing regulations from pollution control board. This approach has helped to go beyond compliance requirements. No cases were received from pollution control board during the reporting year.

## LEADERSHIP INDICATORS

**1. Water withdrawal, consumption and discharge in areas of water stress:**

| Water withdrawal, consumption and discharge in areas of water stress | |
|---|---|
| (i) Name of the area- Ankleshwar, Dahej, Jammu, | |
| (ii) Nature of operations- Manufacturing | |
| (iii) Water withdrawal, consumption and discharge in the following format: | |
| **Parameter** | **Please specify unit** |
| Water withdrawal by source (in kilolitres) | |
| Surface water | 0 |
| Groundwater | 3,367 |
| Sent to third-parties | 47,204 |
| Seawater / desalinated water | 0 |
| Others | 0 |
| **Total volume of water withdrawal (in kilolitres)** | **50,571** |
| **Total volume of water consumption (in kilolitres)** | **50,571** |
| Water intensity per rupee of turnover (Water consumed / turnover) | 0.0000009 |
| Water intensity (optional) - the relevant metric may be selected by the entity | |
| Water intensity in terms of physical output | |
| **Water discharge by destination and level of treatment (in kilolitres)** | |
| (i) Into Surface water | 0 |
| - No treatment | |
| - With treatment - please specify level of treatment | |
| (ii) Into Groundwater | 0 |
| - No treatment | |
| - With treatment - please specify level of treatment | |
| (iii) Into Seawater | 0 |
| - No treatment | |
| - With treatment - please specify level of treatment | |
| (iv) Sent to third-parties | 0 |
| - No treatment | |
| - With treatment - please specify level of treatment | |
| (v) Others | 0 |
| - No treatment | |
| - With treatment - please specify level of treatment | |
| **Total water discharged (in kilolitres)** | |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes

**If yes, name of the external agency.**

We have got all our data points pertaining to environment assured by our Third-party Assurer i.e. TUV SUD for FY 25-26.

**2. Please provide details of total Scope 3 emissions & its intensity, in the following format:**

| Parameter | Unit | FY 2025-26 | FY 2024-25 |
|---|---|---|---|
| Total Scope 3 emissions ( Break-up of the GHG into CO 2, CH4, N2O, HFCs, PFCs, SF6, NF3, if available) | $tCO_2$ | 3,02,419 | 35,28,091 |
| Total Scope 3 emissions per rupee of turnover | | 0.0000053 | 0.000031 |

**Note: Indicate if any independent assessment/ evaluation/assurance has been carried out by an external agency? (Y/N)**

Yes

**If yes, name of the external agency.**

We have got all our data points pertaining to environment assured by our Third-party Assurer i.e. TUV SUD for FY 25-26

**3. With respect to the ecologically sensitive areas reported at Question 10 of Essential Indicators above, provide details of significant direct & indirect impact of the entity on biodiversity in such areas along-with prevention and remediation activities.**

UPL Limited believes that businesses and biodiversity are closely interlinked. We recognize sustainability of both our business and society depends on the natural capital and biodiversity linked ecosystem. Before starting construction of any technical production unit, at UPL we undertake a detailed Environment Impact assessment (EIA) in which the impact on biodiversity deeply studied and we develop the conservation plan to protect biodiversity.

We conducted EIA studies to assess the impacts of its operation on nearby biodiversity and surrounding environment. The findings of the study illustrates that no significant negative impact has been observed on the native flora and fauna.

Our commitment towards continual improvement is promoting conservation of Schedule 1 species in vicinity of operations under The Wildlife (Protection) Act 1978, we have developed wildlife conservation plan in consultation with state forest department, Government of Gujarat. The prepared wildlife conservation plans with activity and budget have been approved by Chief Wildlife Warden of state forest department. The implementation of wildlife conservation plan has been ensured and activities approved under wildlife conservation plan have been reviewed and recognized by state forest department by making a site visit followed by NOC cum appreciation letter.

**4. If the entity has undertaken any specific initiatives or used innovative technology or solutions to improve resource efficiency, or reduce impact due to emissions / effluent discharge / waste generated, please provide details of the same as well as outcome of such initiatives, as per the following format:**

| S. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative | Corrective action taken, if any |
|---|---|---|---|---|
| 1 | Interconnection of SPD Chille in Unit 03 & 26 | After analyzing the loading pattern of all chillers, a 3-inch chilled water supply and return line was installed to interconnect SPD's 350TR chiller with the WDG-02 and Acephate plants. This allowed SPD's chiller to support the cooling load of all three plants, enabling shutdown of the other two chillers & their auxiliaries. | 827820 kWh Energy saved leading to 588 MT of CO2 reduction | |

| S. No. | Initiative undertaken | Details of the initiative (Web-link, if any, may be provided along-with summary) | Outcome of the initiative | Corrective action taken, if any |
|---|---|---|---|---|
| 2. | RO reject water used in canteen for Utensil cleaning in Unit 13 | RO reject water used in canteen for Utensil cleaning instead of Raw water | 1179 kL of fresh water consumption saved | |

5. **Does the entity have a business continuity and disaster management plan?**

   Yes

   **Give details in 100 words/ web link.**

   Please refer to Risk Management section of the Annual Report

6. **Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken by the entity in this regard.**

   We had total 4 on-site audits across our key suppliers in India which generated 58 Critical & Major findings. Out of these, 10 improvement actions are closed.

7. **Percentage of value chain partners (by value of business done with such partners) that were assessed for environmental impacts.**

   68%

8. **How many Green Credits have been generated or procured:**

   a. **By the listed entity**

   Nil

   b. **By the top ten (in terms of value of purchases and sales, respectively) value chain partners.**

   Nil

## PRINCIPLE 7

### BUSINESSES, WHEN ENGAGING IN INFLUENCING PUBLIC AND REGULATORY POLICY, SHOULD DO SO IN A MANNER THAT IS RESPONSIBLE AND TRANSPARENT

### ESSENTIAL INDICATORS

1. a. **Number of affiliations with trade and industry chambers/ associations.**

   UPL is committed to fostering collaboration and open dialogue with trade and industry chambers/associations, ensuring strong connectivity and proactive engagement in addressing shared business and community challenges.

   Currently affiliated with six distinguished trade and industry organizations, UPL leverages these partnerships to exchange valuable insights, drive transformative initiatives, and contribute meaningfully to the advancement of the agricultural sector.

   By actively participating in these alliances, UPL reinforces its dedication to sustainable practices, strengthening its role in shaping a positive, lasting impact on the communities it serves.

   b. **List the top 10 trade and industry chambers/ associations (determined based on the total members of such body) the entity is a member of/ affiliated to.**

| S. No. | Name of the trade and industry chambers/ associations | Reach of trade and industry chambers/ associations (State/National) |
|---|---|---|
| 1 | Vapi Industrial Association | State |
| 2 | Indian Merchant Chambers | National |
| 3 | Crop Care Federation of India | National |
| 4 | Asmechem | National |
| 5 | Centegro Environment of Agriculture | State |
| 6 | CII | National |

2. **Provide details of corrective action taken or underway on any issues related to anti-competitive conduct by the entity, based on adverse orders from regulatory authorities.**

   Not Applicable

### LEADERSHIP INDICATORS

1. **Details of public policy positions advocated by the entity:**

   Not Applicable

## PRINCIPLE 8

### BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

### ESSENTIAL INDICATORS

1. **Details of Social Impact Assessments (SIA) of projects undertaken by the entity based on applicable laws, in the current financial year.**

| Name and brief details of project | SIA notification No. | Date of notification | Whether conducted by independent external agency (Yes/No) | Results communicated in public domain (Yes / No) | Relevant Web Link |
|---|---|---|---|---|---|
| No Assessment undertaken in this FY 25-26 | | | | | |

2. **Provide information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity, in the following format:**

| S. No. | Name of Project for which R&R is ongoing | State | District | No. of Project Affected Families (PAFs) | % of PAFs covered by R&R | Amounts paid to PAFs in the FY (In INR) |
|---|---|---|---|---|---|---|
| | The is no such project for which R&R is undertaken by the Company | NA | NA | NA | NA | NA |

3. **Describe the mechanisms to receive and redress grievances of the community.**

   UPL Comms Engage serves as UPL's dedicated internal mechanism, founded on the belief that a stronger bond between the company and its surrounding communities fosters greater support and mutual progress. Designed as a comprehensive grievance redressal platform, it ensures stakeholders have a structured channel for representation, enabling their voices to be heard while actively contributing to the seamless functioning of the company.

   Built upon a robust framework, this initiative facilitates real-time engagement with communities near UPL factory sites, allowing the company to continuously assess and respond to evolving needs and perceptions. This ongoing dialogue strengthens harmonious relations and promotes trust.

   The committee plays a crucial role in maintaining a healthy and collaborative relationship by conducting frequent discussions with community members and addressing concerns proactively. For an unbiased and effective engagement, the committee is composed of key representatives, including the Unit Head, CSR Head, Unit HR Head, CSR Lead, Environment Lead, Security & Safety Head, and Volunteer Head.

   Meetings are held quarterly, providing a structured forum for evaluating community requests, whether verbal or written. In urgent situations, priority meetings are convened. Requests are carefully reviewed, prioritized, and finalized with mutual agreement before being assigned to the relevant department with defined timelines. The Comms Engage Committee diligently oversees the execution of these commitments, ensuring proper implementation and thorough follow-ups until resolution is achieved.

4. **Percentage of input material (inputs to total inputs by value) sourced from suppliers:**

| | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Directly sourced from MSMEs/ small producers | 18.65% | 4% |
| Directly from within India | 100% | 41.79% |

5. **Job creation in smaller towns - Disclose wages paid to persons employed (including employees or workers employed on a permanent or non-permanent / on contract basis) in the following locations, as % of total wage cost**

| Location | FY 2025-26 | FY 2024-25 |
|---|---|---|
| Rural | 0% | 2.23% |
| Semi-urban | 9% | 11.92% |
| Urban | 68% | 30.90% |
| Metropolitan | 23% | 50.26% |

## LEADERSHIP INDICATORS

1. **Provide details of actions taken to mitigate any negative social impacts identified in the Social Impact Assessments (Reference: Question 1 of Essential Indicators above):**

| Details of negative social impact identified | Corrective action taken |
|---|---|
| Nil | No |

2. **Provide the following information on CSR projects undertaken by your entity in designated aspirational districts as identified by government bodies:**

| S. No. | State | Aspirational District | Amount spent (In INR) |
|---|---|---|---|
| 1 | Gujarat | Narmada | 80.92 Lakhs |

The Narmada Development Project is a strategic initiative aimed at enhancing the agricultural value chain by engaging over 5,000 small and marginal farmers across more than 100 villages in four blocks of the Narmada district including Sagbara, Dediapada, Nandod, and Garudeshwar, over a three-year period. The primary objective is to improve farmers' incomes through a comprehensive and integrated approach.

As part of this initiative, UPL is focused on developing key verticals, including:

1. Enhancing Farming Capacities through the UPL Centre for Agriculture Excellence (U-CoAE), which delivers best practices, technical guidance, and skill development.
2. Establishing and Strengthening Farmer Producer Organisations (FPOs) to support value chain services and improve the marketing and sale of key crops such as pigeon pea, maize, banana, and vegetables ultimately contributing to income enhancement.
3. Promoting Collaboration and Convergence with NGOs and government departments to effectively channel benefits and resources to the grassroots level.
4. Developing Irrigation Infrastructure in two key clusters Dumkhal and Mal Samot, within the Dediapada block, to improve water access and agricultural productivity..

3. **(a) Do you have a preferential procurement policy where you give preference to purchase from suppliers comprising marginalized /vulnerable groups? (Yes/No)**

UPL operates without a preferential procurement policy for its business needs. However, through our Sustainable Sourcing initiative, we actively engage with suppliers, conducting comprehensive ESG assessments to evaluate and enhance their environmental, social, and governance performance.

Based on these assessments, we collaborate with suppliers to help them strengthen their ESG standards, fostering responsible and sustainable business practices across our supply chain. Additionally, we actively encourage procurement from Micro, Small, and Medium Enterprises (MSMEs) wherever feasible, supporting their growth and contribution to the industry.

**(b) From which marginalized /vulnerable groups do you procure?**

Yes. We try to procure from MSME and organizations led by Women leaders, where possible.

**(c) What percentage of total procurement (by value) does it constitute?**

18.65%

4. **Details of the benefits derived and shared from the intellectual properties owned or acquired by your entity (in the current financial year), based on traditional knowledge:**

| S. No. | Intellectual Property based on traditional knowledge | Owned/ Acquired (Yes/No) | Benefit shared (Yes / No) | Basis of calculating benefit share |
|---|---|---|---|---|
| | | Nil | | |

5. **Details of corrective actions taken or underway, based on any adverse order in intellectual property related disputes wherein usage of traditional knowledge is involved.**

| Name of authority | Brief of the Case | Corrective action taken |
|---|---|---|
| | Nil | |

6. **Details of beneficiaries of CSR Projects:**

| S. No. | CSR Project | No. of persons benefitted from CSR Projects | % of beneficiaries from vulnerable and marginalized groups |
|---|---|---|---|
| 1 | 27 projects | Under review | >90% across projects |

# PRINCIPLE 9

## BUSINESSES SHOULD ENGAGE WITH AND PROVIDE VALUE TO THEIR CONSUMERS IN A RESPONSIBLE MANNER

## ESSENTIAL INDICATORS

1. **Describe the mechanisms in place to receive and respond to consumer complaints and feedback.**

There is a proper mechanism for consumer complaints along with the feedback, so once we receive the customer complaint, it is raised in SAP system. Complaint is acknowledged by QA head within 2 working days and investigation is done using various tools and with help of CFT. The investigation report is prepared and shared with respective Sales and Marketing team within 15 days. Sales team shares the final report with the customer and their feedback is taken within 2 weeks. Basis the feedback from the customer, the complaint is closed in SAP system.

2. **Turnover of products and/ services as a percentage of turnover from all products/service that carry information about:**

| | As a percentage to total turnover |
|---|---|
| Environmental and social parameters relevant to the product | - |
| Safe and responsible usage | 100% |
| Recycling and/or safe disposal | Disposal details are shared under Material Safety Data Sheet (MSDS). We follow disposal guidelines as per local law/ regulation |

3. **Number of consumer complaints in respect of the following:**

| | FY 2025-26 | | | FY 2024-25 | | |
|---|---|---|---|---|---|---|
| | Received during the year | Pending resolution at end of year | Remarks | Received during the year | Pending resolution at end of year | Remarks |
| Data privacy | Nil | Nil | | Nil | Nil | |
| Advertising | Nil | Nil | | Nil | Nil | |
| Cyber-security | Nil | Nil | | Nil | Nil | |
| Delivery of essential services | Nil | Nil | | Nil | Nil | |
| Restrictive Trade Practices | Nil | Nil | | Nil | Nil | |
| Unfair Trade Practices | Nil | Nil | | Nil | Nil | |
| Other | - | - | | - | - | |

4. **Details of instances of product recalls on account of safety issues:**

   Zero

5. **Does the entity have a framework/ policy on cyber security and risks related to data privacy? (Yes/No)**

   At UPL, we have established a robust framework and policy to effectively address cybersecurity and data privacy risks. Safeguarding business information and protecting stakeholder privacy remain top priorities, driving our commitment to the highest security standards.

   To ensure comprehensive protection, we have implemented the Global Business Information Protection Policy. This policy serves as a guiding framework, outlining stringent measures for the handling, storage, and transmission of business data and personal information across our operations.

   For an in-depth understanding of our cybersecurity and data privacy initiatives, stakeholders can refer to our Global Business Information Protection Policy. Through proactive risk mitigation and vigilant security practices, UPL reinforces its dedication to protecting sensitive information, fostering trust, and maintaining stakeholder confidence.

   **If available, provide a web-link of the policy.**

   https://www.upl-ltd.com/corporate_governance_pdfs/Q7Rxtq4J16gJBNuWWrA8jL41GpSvxNtgKIz21mHQ/Global-Business-Information-Protection-Policy.pdf

6. **Provide details of any corrective actions taken or underway on issues relating to advertising, and delivery of essential services; cyber security and data privacy of customers; re-occurrence of instances of product recalls; penalty / action taken by regulatory authorities on safety of products / services.**

   Not applicable

7. **Provide the following information relating to data breaches:**

   a. **Number of instances of data breaches along-with impact**

      Zero

   b. **Percentage of data breaches involving personally identifiable information of customers**

      Zero

## LEADERSHIP INDICATORS

1. **Channels / platforms where information on products and services of the entity can be accessed (provide web link, if available).**

   For comprehensive information about UPL's products and services, visit our official website at www.upl-ltd.com. Our platform provides detailed insights into our diverse range of agricultural solutions, including crop protection products, seeds, and biostimulants.

   Designed for seamless navigation, the website allows visitors to explore product descriptions, technical specifications, safety guidelines, case studies, and the latest industry updates. Whether seeking cutting-edge innovations or essential agricultural resources, our website serves as a one-stop destination for all your needs.

2. **Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.**

   At UPL, we prioritize farmer education and engagement to promote the safe and responsible use of our products. Through initiatives like **"Apply Well"** and **"Applique Bem,"** we equip farmers with essential knowledge on best agricultural practices, ensuring effective and sustainable applications.

   **"Apply Well"** focuses on correct application techniques, guiding farmers on the appropriate equipment, timing, and environmental considerations for optimal results. We emphasize the importance of adhering to label instructions, proper mixing and dilution, and recommended safety precautions. Meanwhile, "Applique Bem" broadens our educational outreach by raising awareness about Integrated Pest Management (IPM) and sustainable farming techniques. This approach encourages farmers to integrate biological control agents, crop rotation, and responsible use of crop protection products to reduce pest resistance and foster long-term crop health.

   Our farmer engagement programs include **interactive sessions, field demonstrations, and knowledge-sharing platforms**, fostering an open dialogue where farmers can seek guidance, ask questions, and gain firsthand experience in responsible product usage.

   For comprehensive information on safe and effective application, each product page on our official website, www.upl-ltd.com, provides detailed **Direction for Safe Use**, covering dosage, application methods, and optimal timing to ensure proper handling.

   Through continuous education and engagement, UPL remains committed to empowering farmers, advancing agricultural sustainability, and strengthening community trust

   Moreover, our product pages also highlight important storage instructions, emphasizing the need to store the products in a secure and controlled environment to maintain their efficacy and prevent any potential risks.

   Few examples which can be accessed on website (https://www.upl-ltd.com/) are:-

   Fazor

   Fungicide - Best Systemic Fungicide Products for Plants

   SAATHI

3. **Mechanisms in place to inform consumers of any risk of disruption/discontinuation of essential services.**

   Not applicable

4. **Does the entity display product information on the product over and above what is mandated as per local laws? (Yes/No/Not applicable)**

   Yes

   **If yes, provide details in brief.**

   UPL is committed to surpassing regulatory standards when it comes to product labeling, ensuring that our customers receive clear, comprehensive, and transparent information.

   Our product labels are designed to provide essential details that enhance safety and efficacy, strictly adhering to regulations set by authorities such as the Central Insecticides Board (CIB) and legal metrology guidelines of respective countries. By exceeding minimum legal requirements, we reaffirm our dedication to empowering customers with accurate and in-depth knowledge about our products.

   This proactive approach allows customers to make well-informed decisions while ensuring responsible and effective product usage. At UPL, we view it as a fundamental responsibility to maintain **clarity, accessibility, and transparency** in our labeling practices. By consistently going beyond industry standards, we aim to strengthen trust, promote safety, and enhance customer confidence.

   **Did your entity carry out any survey with regard to consumer satisfaction relating to the major products / services of the entity, significant locations of operation of the entity or the entity as a whole? (Yes/No)**

   **Yes,** At UPL, we are deeply committed to delivering top-tier agricultural solutions, with customer insights playing a pivotal role in shaping our approach. We recognize the value of both in-house and third-party surveys conducted through market research agencies to better understand the evolving needs and preferences of our customers.

   Internally, our surveys focus on **dealer and farmer satisfaction,** helping us identify and bridge gaps in meeting their requirements. To ensure direct and efficient communication, we have established **Adarsh Kisan Centers (AKC)** with dedicated call centers in key cities, including **Mumbai, Visakhapatnam, Chandigarh, and Baroda**. Customers can easily connect with us via a **toll-free** number, featured on all product packaging, to lodge complaints or provide feedback. Every query is treated with the utmost priority, ensuring timely and effective resolution.

   For cases requiring further assistance, we take an extra step by deploying our **field executive team**, where a representative personally visits the customer's location to address and resolve concerns. This **personalized approach** reflects our unwavering commitment to customer satisfaction.

   Beyond complaint resolution, our call centers also serve as platforms for gathering feedback from registered farmers at AKC. These broader surveys encompass aspects such as **product availability, usage insights, and market access for their harvest**, providing invaluable perspectives on our products and services.

   Additionally, we conduct **external surveys** in partnership with reputable market research agencies, specifically targeting farmers to assess **product usage, satisfaction levels, and unmet needs**. These insights enable us to continually refine our offerings, **enhance product quality, ease of use, and value for money**.

   Ultimately, both our internal and external surveys have proven instrumental in delivering **actionable insights** that fuel continuous improvement. By leveraging this valuable feedback, we strengthen customer satisfaction and reaffirm our position as a **trusted provider of agricultural solutions**.

# Independent Reasonable Assurance Statement to UPL Ltd. on their Annual BRSR Report for the financial year 2025-2026

## Introduction and Engagement

UPL Ltd. (hereinafter the Company) has developed its Business Responsibility and Sustainability Report (BRSR) (the Report') based on the BRSR reporting guidelines including the BRSR Core indicators prescribed by SEBI for listed entities. The Company's sustainable performance reporting criteria have been derived from the Principles of National Guidelines on Responsible Business Conduct (NGRBC), Regulation 34(2)(f) of the Securities and Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) (the "LODR Regulations"), Guidance note for BRSR format issued by SEBI, and Greenhouse Gas (GHG) Protocol - A Corporate Accounting and Reporting Standard.

**TÜV SÜD South Asia Pvt. Ltd. ('TÜV SÜD')** has been engaged by the Company to conduct and provide independent assurance on the BRSR Core indicators of the Report those includes the Company's sustainability performance for the period April 1, 2025, to March 31, 2026.

## The Company's Responsibility

The content of the Reports and their presentation are the sole responsibilities of the Management of the Company. The Company Management is also responsible for the design, implementation, and maintenance of internal controls relevant to the preparation of the Reports, so that it is free from material misstatement.

The Company is responsible for ensuring that its business operations and activities comply with the applicable statutory and regulatory requirements. The Reports and disclosures have been approved by and remain the responsibility of the Company.

## TÜV SÜD's Responsibility

**TÜV SÜD**, in performing assurance work, is responsible for carrying out an assurance engagement and to provide independent Reasonable assurance on the non- financial information of the BRSR Core indicators as described in the 'Scope & boundary of assurance' section below. We do not accept or assume any responsibility for any other purpose or to any other person or organization. Any reliance a third party may place on the Report is entirely at its own risk.

## Assurance standard and criteria

- We applied the criteria of 'Reasonable' Assurance for non-financial Core Indicators of BRSR[1] (Business Responsibility & Sustainability Report), Our reasonable assurance engagement for only non-financial Core indicators of BRSR was with respect to the financial year ended March 31, 2026.
- We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), "Assurance Engagements Other than Audits or Reviews of Historical Financial Information", and ISAE 3410, "Assurance Engagements on Greenhouse Gas Statement", issued by the International Auditing and Standards Board.
- We referred "WRI/WBCSD GHG Protocol (Greenhouse Gas Protocol)" as well as ISO 14064-1:2018 & ISO 14064-3:2019 for GHG Emissions.

## Scope and boundary of assurance

We have assured non-financial information of the BRSR Core Indicators[2] in the Report, pertaining to the Company's non-financial performance for the period April 1, 2025, through March 31, 2026. We understand that the financial information in the BRSR Core is derived from the Company's audited financial statements.

Our assurance engagement covered the operations and activities of the Company for the following requirements:

- Verifying conformance with the Company's reporting methodologies
- Evaluating the accuracy and reliability of data for the selected indicators

The boundary of verification included:

- Operational Units- 3 in Numbers present across Gujarat, Maharashtra and Jammu & Kashmir
- Offices – 2 in Numbers present across Maharashtra

Verification of non-financial sustainability performance data, based on our professional judgement, was conducted by multidisciplinary team including assurance practitioners, engineers, environmental & social experts of TÜV SÜD in the month of May 2026, in line with the principle of materiality, at the following sites:

| Sl.No. | Company Name | Site Address |
|---|---|---|
| 1 | UPL Limited | Unit 3, UPL Limited, Ankleshwar, Gujarat- On-Site Verification |
| 2 | | Unit 8, UPL Limited, Jammu - Desktop verification |
| 3 | | Unit 13, UPL Limited, Dahej, Gujarat- Desktop Verification |
| 4 | | Corporate Office, Turbhe, Maharshtra- On-Site Verification |

[1] SEBI vide Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122 dated July 12, 2023

[2] As set out under Appendix 1 to this statement.

## Assurance Methodology

We conducted a review and verification of data collection, collation and calculation methodologies, and a general review of the logic of inclusion/omission of relevant information/data in the Report. Our review process included:

- Evaluate and assess the appropriateness of the quantification methods used to arrive at the non-financial sustainability information of the BRSR Core indicators in the Report
- Engagement through discussions with departmental heads, external stakeholders and corporate teams to understand the process for collecting, collating, and reporting as per Assurance Engagements (ISAE) 3000 (Revised), Guidance Note on BRSR.
- Review of the sustainability initiatives, practices, on ground establishment, implementation, maintenance, and performance described in the Report.
- Review of data collection and management procedures, and related internal controls.
- Assessment of the reporting mechanism and consistency with the reporting criteria.
- Review of appropriateness of various assumptions, estimations and thresholds used by the Company for data analysis.
- Execution of an audit trail of claims and data streams, to determine the level of accuracy in collection, transcription, and aggregation.
- Verification of the fact that no material distortion has been done at any stage.

## Inherent Limitations and Exclusions

There are inherent limitations in assurance engagement, including, for example, the use of judgement and selective testing of data. Accordingly, there are possibilities that material misstatements in the sustainability information of the Report may remain undetected.

TÜV SÜD has relied on the information, documents, records, data, and explanations provided to us by the Company for the purpose of our review.

The Assurance scope excludes the following:

- Data and information fall outside the defined reporting period (April 1, 2025, to March 31, 2026).
- Review of the 'economic and/or financial performance indicators' included in the Report or on which reporting is based; we have been informed of by the Company that these are derived from the Company's audited financial records.
- The Company's statements that describe qualitative/quantitative assertions, expression of opinion, belief, inference, aspiration, expectation, aim or future intention.
- Any disclosures beyond those specified in the Scope section above.

## Our observations

The sustainability disclosures of the Company, as defined under the scope and boundary of assurance, are reliable, valid and the Company has appropriately consolidated data from different sources at the central level. The Company has made considerable efforts to ensure consistency of data for this Report; however, the Company may continue to improve robustness of its data collection and collation process.

Our above observations, however, do not affect our conclusion regarding the Report.

## Conclusion

Based on the scope of our review, we conclude the following:

- **Reasonable Assurance of BRSR Core indicators:** The non-financial sustainability disclosures of the BRSR Core indicators as mentioned in 'Scope and boundary of assurance' reasonably fulfil the criteria of relevance, completeness, reliability, neutrality, and understandability as per 'reasonable' assurance criteria. We found that the information and data provided in all the sections and principles are consistent and adequate with regards to the reporting criteria of the BRSR.

Our conclusions are outlined below:

**Governance, leadership and supervision:** The top management's commitment, business model promoting inclusive growth, action and strategies, focus on services, risk management, protection and restoration of environment, and priorities are represented adequately.

**Stakeholder Inclusiveness:** We have not identified any discrepancies in this aspect. Internal and external Stakeholder identification and engagement is carried out by the company on a periodic basis to bring out key stakeholder concerns as material aspects of significant stakeholders.

**Materiality:** The materiality assessment process has been carried out, based on the requirements of the Assurance Engagements (ISAE) 3000 (Revised), Guidance Note on BRSR and as per GRI 2021 considering aspects that are internal and external to the company's context of the organization. The Reports fairly bring out the aspects and topics and its respective boundaries of the diverse operations of company in our view, the Reports meets the requirements.

**Responsiveness:** We believe that the responses to the material aspects are defined and captured in the Reports, in our view, the Reports meets the requirements.

**Completeness:** The Reports have fairly disclosed the general and specific standard disclosures including the Disclosure on Management Approach, monitoring systems and sustainability performance indicators as prescribed in the standards in accordance with the Core requirement. In our view the Reports meet the requirements.

**Reliability:** Most of the data and information was verified by the assurance team and found appropriate. Minor inaccuracies in the data identified during the verification process were found to be attributable to transcription and interpretation errors and these errors were corrected immediately. Therefore, in accordance with the ISAE 3000 (Revised) assurance engagement, TÜV SÜD concludes that the sustainability data, parameters, information, and indicators presented in the Reports are reliable and acceptable.

**Impact:** We observed and assessed that the Company has well-defined procedures to routinely monitor and measure their sustainability impact, and they have skilled subject matter experts who are driving sustainability effectively and efficiently.

**Consistency and comparability:** The information in the Report is presented in a consistent and comprehensive method. Thus, the principle of consistency and comparability is satisfactory.

During verification we did not come across any such instances or issues where we found anything which has an impact on the ecosystem and well as the neighboring infrastructure. In our view, the Reports meet the requirements.

Our statements do not extend to any disclosures or assertions relating to future performance plans and/or strategies disclosed in the reports.

### Our Independence, Ethical Requirements and Quality Control

Our team comprises subject matter experts of multidisciplinary professionals, have complied with independence policies of TÜV SÜD, which address the requirements of the ISAE 3000 (Revised) in the role as independent Verifier. TÜV SÜD states its independence and impartiality and confirms that there is "no conflict of interest" regarding this assurance engagement. In the reporting year, TÜV SÜD did not work with the Company on any engagement that could compromise the independence or impartiality of our findings, conclusions, and recommendations. TÜV SÜD was not involved in the preparation of any content or data included in the Reports, except for this assurance statement.

TÜV SÜD maintains complete impartiality towards any individuals interviewed during the assurance engagement. We have complied with the relevant applicable requirements of the International Standard on Quality Control ("ISQC") 1, Quality.

### Statement of Independence, Impartiality and Competence

TÜV SÜD South Asia Pvt. Ltd is an independent professional services company that specializes in Health, Safety, Social and Environmental & Sustainability services including assurance with over 150 years history in providing these services.

No member of the assurance team has a business relationship with the Company, its directors or Managers beyond that of verification and assurance of sustainability data and reporting. We have conducted this assurance independently and we believe there has been no conflict of interest.

TÜV SÜD has implemented a Code of Ethics across the business to maintain high ethical standards among staff in their day-to-day business activities.

Mumbai, June 26, 2026

**Prosenjit Mitra**
General Manager- Audit Services
Management System Assurance

**Dr. Rajnish Kumar**
Verification Team Leader, TÜV SÜD
Management System Assurance

## Appendix 1

**Identified Sustainability Information**

### A. BRSR Core Indicators

| S. No | Principles | Attribute | Parameter |
|---|---|---|---|
| 1 | Principle 6 – E7 | Green-house gas (GHG) footprint | 1. Total Scope 1 emissions (Break-up of the GHG into $CO_2$, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)<br>2. TotalScope 2 emissions (Break-up of the GHG ($CO_2$e) into $CO_2$, CH4, N2O, HFCs, PFCs, SF6, NF3, if available)<br>3. GHG Emission Intensity (Scope 1+2)<br>a) Total Scope 1 and Scope 2 emissions (MT)/Total Revenue from Operations adjusted for PPP<br>b) Total Scope 1 and Scope 2 emissions (MT)/Total Output of Product or Services |
| 2 | Principle 6 -E3<br>Principle 6 - E4 | Water Footprint | 1. Total water consumption<br>2. Water consumption intensity<br>a) Water intensity per rupee of turnover adjusted for PPP<br>b) Water intensity in terms of physical output<br>3. Water Discharge by destination and levels of treatment |
| 3 | Principle 6 – E1 | Energy Footprint | 1. Total Energy Consumed<br>2. % of energy consumed from renewable sources<br>3. Energy intensity<br>a) Energy intensity per rupee of turnover adjusted for PPP<br>b) Energy intensity in terms of physical output |
| 4 | Principle 6 – E9 | Embracing circularity - details related to waste management by the entity | 1. -Plastic waste (A)<br>-E-waste (B)<br>-Bio-medical waste (C)<br>-Construction and demolition waste (D)<br>-Battery waste (E)<br>-Radioactive waste (F)<br>-Other Hazardous waste (G)<br>-Other Non-hazardous waste generated (H)<br>-Total waste generated (A+B+C+D+E+F+G+H))<br>-Waste intensity<br>a) Waste intensity per rupee of turnover adjusted for PPP<br>b) Waste intensity in terms of physical output<br>2. For each category of waste generated, total waste recovered through recycling, re-using or other recovery operations<br>3. For each category of waste generated, total waste disposed by nature of disposal method |
| 5 | Principle 3 – E1 (c)<br>Principle 3 – E11 | Enhancing Employee Wellbeing and Safety | 1. Spending on measures towards the wellbeing of employees and workers – cost incurred as a % of the total revenue of the Company<br>2. Details of safety-related incidents for employees and workers (including contract-workforce)<br>a) Number of permanent disabilities<br>b) Lost Time Injury Frequency Rate (LTIFR) (per one million-person hours worked)<br>c) No. of fatalities |
| 6 | Principle 5 - E3<br>Principle 5 -E7 | Enabling Gender Diversity in Business | 1. Gross wages paid to females as a % of wages paid<br>2. Complaints on POSH<br>a) Total complaints on Sexual Harassment (POSH) reported<br>b) Complaints on POSH as a % of female employees/workers<br>c) Complaints on POSH upheld |

| S. No | Principles | Attribute | Parameter |
|---|---|---|---|
| 7 | Principle 8 – E4<br>Principle 8 – E5 | Enabling Inclusive Development | 1. Input material sourced from following sources as % of total purchases – Directly sourced from MSMEs/ small producers and from within India<br>2. Job creation in smaller towns-wages paid to people employed in smaller towns (permanent or non- permanent/on contract) as % of total wage cost) |
| 8 | Principle 9 – E7<br>Principle 1– E8 | Fairness in Engaging with Customers and Suppliers | 1. Instances involving loss/breach of data of customers as a percentage of total data breaches or cyber security events<br>2. Number of days of accounts payable |
| 9 | Principle 1 - E9 | Open-ness of business | 1. Concentration of purchases & sales done with trading houses, dealers, and related parties Loans and advances & investments with related parties |