

Slavery and Human Trafficking Statement

March 2025

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015.

Organisational Structure

UPL Europe Ltd ("UPL") is a crop protection company having its ultimate parent in India. UPL's product portfolio comprises fungicides, herbicides, fumigants and speciality chemicals which are broadly focused on addressing pest resistance and food sustainability. UPL Europe's activities include the manufacture, the development, and the registration of plant protection products including bio in UK, in Europe but also all over the world via its subsidiaries.

UPL has various subsidiaries some of which are UK registered companies. While these subsidiaries do not in themselves fulfil the requirements of section 54 of the Modern Slavery Act 2015, this statement is prepared with the intention of detailing where necessary the steps taken in relation to UPL's subsidiaries to the extent that their activities form part of UPL's overall supply chain.

Policies

We have appropriate policies in place that underpin our commitment to addressing the risks of modern slavery or human trafficking in our supply chains or in any part of our business.

Our policies reflect our commitment to acting ethically and with integrity in all of our business relationships and to implementing and enforcing effective systems and controls to address the risks of slavery and human trafficking taking place in our supply chains. We have the following policies in place relevant to modern slavery:

- **Code of Conduct:** In accordance with our Code of Conduct UPL is compliant with and continuously seeks to ensure that the conduct of all UPL employees is aligned with applicable labour laws, domestic and internationally agreed standards of labour and human rights, such as the Universal Declaration of Human Rights and the International Labour Organization's core conventions. We acknowledge employees' choice to participate in labour unions or other similar employee organizations. Principles of fair compensation and benefits, entitlement to adequate working hours and paid leaves are thoroughly followed at UPL.
- Considering that some of the markets where we operate have a higher risk of child labour deployment, we also engage with several business partners whose operations could be exposed to exploitative labour practices, specifically with respect to children. We adhere to a strict no child labour policy and specifically prohibit any kind of child labour practices within our premises, offices, factories or warehouses. Each employee of UPL is required to comply with this policy and ensure that they do not engage in any practices that lead to or encourage child labour. In addition, we ensure compliance by our business partners by not only making them bound by contractual obligations but also by periodical inspections including surprise spot-checks of their premises/operations.

Due diligence processes for slavery and human trafficking

- (1) We understand that the highest modern slavery risks in our supply chain appear in relation to our supply of active substances for use in the manufacturing process. This is because active substances are the key ingredients in UPL's products, for which UPL relies on many external suppliers in different jurisdictions.
- (2) As part of our initiative to identify and mitigate risk we visit our key suppliers in order to ensure they are complying with our Code of Conduct.
- (3) We also have in place systems to:
 - Identify and assess potential risk areas in our supply chains.
 - Mitigate the risk of slavery and human trafficking occurring in our supply chains.
 - Monitor potential risk areas in our supply chains.
 - Protect whistle blowers.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff.

Our employees are required to complete quarterly trainings on our Code of Conduct and the values and required behaviours therein. This training includes business relevant scenarios to illustrate and test trainee engagement and understanding and concludes with an attestation by the employee confirming their understanding of their responsibilities. It is made clear in our Code and related training that, should an employee ever have a concern that UPL's high standards of ethical and compliant behaviour are not being met, either in the business or by the third parties engaged with the business, they are required to raise that concern.

Our effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains;

- Implementation of a yearly training programs for key SC stakeholders ;
- Reporting in case of any incidence of identified slavery risks, if any, within our operations and supply chains.
- Response times to incidents of identified slavery risks, if any, and the resolution outcomes.

Next steps

Following a review of the effectiveness of the steps we have taken to address the risks of slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Adding a commitment to all supply chain agreements obligating suppliers to comply with the UK Modern Slavery Act 2015; and
- Inform and train our procurement team about modern slavery risks in our supply chain and how to mitigate these risks.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes UPL's slavery and human trafficking statement for the financial year ending 31 March 2024.

This statement has been reviewed for the financial year ending 31 March 2025 and remains unchanged from the previous year, as no new risks or issues have been identified. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes UPL's slavery and human trafficking statement for the financial year ending 31 March 2025.

31 March 2025

Guilhem de Gaillard
Director
UPL Europe Ltd

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