

Modern Slavery Statement 2024

UPL Australia Pty Ltd (ACN 066 391 384)

Introduction

This statement is prepared on behalf of UPL Australia Pty Ltd ACN 066 391 384 (**UPL Australia**) pursuant to the *Modern Slavery Act 2018* (Cth). The reporting period for this Modern Slavery Statement is 1 July 2023 to 30 June 2024.

Who we are:

UPL Australia is a private company headquartered in Adelaide, South Australia, with approximately 35 direct employees. UPL Australia owns and controls the following entities:

- Arysta LifeScience Australia Pty Ltd (ACN 005 225 507) (**AL Australia**)
- MacDermid Agricultural Solutions Australia Pty Ltd (ACN 600 074 593) (**MAS Australia**)

UPL Australia is subsidiary of the Indian multinational company UPL Limited. UPL Limited and its subsidiaries (**UPL Group**) are a leading provider of sustainable agricultural solutions and services, with more than 14,000 product registrations, a sales presence in over 140 countries and annual revenue exceeding US\$6 billion. The UPL Group is one of the most significant players in the agriculture industry, and a leading manufacturer and distributor of natural solutions.

Our operations

UPL Australia's main operations involve procuring and distributing agricultural chemicals such as herbicides, fungicides, insecticides, miticides, seed treatments and biosolutions. UPL Australia procures agricultural chemicals in technical form and finished product from a range of Australian and international suppliers, and distributes the products to rural retailers and growers.

AL Australia owns and operates the Hannaford franchise business. Hannaford franchisees offer seed cleaning, grading and treating solutions to growers to maximise crop potential. As franchisor, AL Australia provides sales, marketing, technical and administrative support to assist Hannaford franchisees to operate successful and profitable businesses.

MAS Australia is a holding company which does not have physical operations or assets.

Our supply chains

Agricultural chemicals

A majority of the agricultural chemicals that UPL Australia procures is imported from UPL Group companies based overseas. UPL Australia also procures a portion of our agricultural chemicals from non-UPL Group companies based in Australia and overseas. UPL Australia's agricultural chemical suppliers are located in India, China, Hong Kong, Japan, Vietnam, Indonesia, South Africa, Mauritius, France, Belgium, North America, New Zealand and Australia.

UPL Australia acknowledges that our supply chains include the manufacture, transport and procurement of source materials and equipment used in making the goods that are supplied to us. For example, our supply chain includes first tier suppliers from which UPL Australia procures goods and services directly, as well as second (and further) tier suppliers who contribute to the goods and services produced by UPL Australia's first tier suppliers (eg, manufacturers of raw materials used by first tier suppliers).

Other suppliers

UPL Australia also procures a range of services which enable us to carry on our business of distributing crop protection solutions. These services include freight, logistics, warehousing, technology, legal and administrative services. These services are generally provided by suppliers based in Australia.

Modern Slavery Risks

UPL Australia is committed to assessing and addressing modern slavery risks in our operations and supply chains.

UPL Australia considers that our local operations managed by our direct employees have a low modern slavery risk. UPL Australia has a dedicated HR team and obtains professional external legal advice to ensure that all employees receive at least their minimum entitlements at law.

UPL Australia appreciates that risks of modern slavery in its supply chain may exist as a result of the geographic location of some of our suppliers. In particular, we acknowledge that we import products from countries such as China, India, Vietnam and Indonesia which are known to have a higher prevalence of modern slavery.

UPL Australia also understands that there may be additional risks of modern slavery in areas where we lack insight into second tier suppliers and source materials used in products supplied to us. We recognise that these risks may be exacerbated where manufacturers rely on unskilled labour to manufacture large quantities of chemical products at a low cost.

The steps that UPL Australia (and UPL Limited at a global level) has taken to address these risks are set out below.

Our Approach to Modern Slavery

As parent company of UPL Australia and several of UPL Australia's largest suppliers, UPL Limited has taken a range of steps to generate awareness about risks associated with modern slavery and human rights in its operations and supply chains. Some of these steps are set out below, however further information can be found at <https://www.upl-ltd.com/sustainability/people-development/human-rights>.

Given that UPL Australia imports a majority of its inventory from UPL Group companies, UPL Australia considers that the steps taken by UPL Limited significantly reduce the risk of modern slavery in UPL Australia's supply chain.

Policies

Pursuant to UPL Limited's Global Code of Conduct, UPL Group companies and their employees are expected to comply with applicable labour laws, internationally agreed standards of labour and human rights and the International Labour Organization's core conventions (which include freedom from forced labour and freedom from child labour).

Similarly, UPL Limited's Supplier Code of Conduct prohibits the use of any form of forced or involuntary prison labour, bonded labour and slave labour. Further, suppliers are expected to have clear and effective policies relating to forced labour.

UPL Limited's Sustainability Policy for Responsible Care includes 'zero tolerance for child, forced, or involuntary labour' and applies to UPL Group companies as well as its vendors and suppliers.

UPL Limited provides regular training in respect of its policies to UPL Group companies and their employees via an internal training portal.

Project Against Child Labour

Given its involvement in the agricultural industry in developing countries, the UPL Group is particularly committed to eliminating child labour and promoting education. In 2022-23, the UPL Group's Project Against Child Labour engaged with 7,500 workers in the agricultural sector, monitored 2,500 growers' fields and held more than 50 awareness programs in schools.

UPL Limited's Child Labour Policy expressly prohibits child labour practices within its premises, offices, factories or warehouses. The policy provides that contracts with business partners contain non-negotiable contractual clauses prohibiting the use of child labour, and that business partners are required to warrant that they do not use child labour in their operations. Further, the policy provides that surprise inspections

are conducted on third-party suppliers and growers, and that any business partner found to be using child labour is blacklisted.

Further information in respect of UPL Limited's commitment to the elimination of child labour can be found here: <https://www.upl-ltd.com/sustainability/social-responsibility/united-against-child-labour>.

Reporting

Complaints regarding breaches of UPL Limited's Global Code of Conduct (including breaches relating to improper labour practices) may be anonymously reported to a managed reporting channel via email, website or hotline.

Further, since 2020, UPL Limited has maintained a whistleblower program which allows employees to make protected disclosures of suspected or actual unethical or improper activity to the Chairperson of the Audit Committee via a designated email address. Disclosers may choose to remain anonymous and are entitled to protection from unfair treatment and retaliation.

Supplier questionnaire

In addition to the measures implemented by UPL Limited, UPL Australia has developed a detailed questionnaire that it intends to provide to prospective suppliers that are deemed to have an increased risk of modern slavery (eg, due to the geographic location of the supplier). The aim of this questionnaire is to provide UPL Australia with greater awareness of its external suppliers' operations and to alert UPL Australia to any red flags for modern slavery that may exist in these operations. The questionnaire covers a range of areas including:

- policies and procedures relevant to modern slavery;
- contractual obligations relevant to modern slavery;
- due diligence undertaken to identify and assess modern slavery risks in suppliers;
- employee management and entitlements;
- supply chain management (including procurement and other investigation processes).

Assessing the Effectiveness of our Approach to Modern Slavery

UPL Group has a dedicated CSR Committee whose role includes reviewing and auditing CSR activities/projects of UPL Group, which include some of its global measures for addressing risks of modern slavery. Further details on the role of the CSR Committee are outlined in UPL's Corporate Social Responsibility Policy, which can be found here: <https://www.upl-ltd.com/sustainability/social-responsibility/documents>.

UPL Australia is committed to reviewing and assessing the effectiveness of our actions to identify and address modern slavery risks in our supply chain. We understand that this is an ongoing process. We have commenced work on new frameworks (such as the introduction of the supplier questionnaire) that will provide us with feedback and trends to inform the effectiveness of our approach to modern slavery in the future.

Consultation

AL Australia is 100% owned and controlled by UPL Australia. As members of the UPL Group, UPL Australia and AL Australia are both governed by the UPL Limited board and are expected to adhere to UPL Limited's policies. UPL Australia consulted with AL Australia in the preparation of this statement by providing a copy of this policy to the board of AL Australia and inviting feedback.

MAS Australia is a dormant holding company for AL Australia and accordingly, our consultation with AL Australia in preparing this statement covered any matters relevant to MAS Australia.

Other relevant matters

The UPL Group is committed to sustainability and corporate social responsibility (**CSR**). Each year, UPL Limited publishes a CSR Annual Report which sets out the UPL Group's involvement in programs that aim to improve health and well-being, education and sustainability. A copy of UPL Limited's CSR Annual Report can be found here: <https://www.upl-ltd.com/sustainability/social-responsibility/documents>.

This statement was approved by the board of directors of UPL Australia Pty Ltd ACN 066 391 384 on 9th October 2024

Signed:

A handwritten signature in black ink, appearing to read 'Michael Caldwell', written in a cursive style.

Michael Caldwell

Director