Product Stewardship Policy

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Version Number	Reviewed by	Approved Date	Approved By
1.0	Business Heads	14th Feb 2023	Board of Directors
1.1	Business Heads	17th May 2025	Board of Directors

1. Purpose

UFlex Limited (hereinafter referred to as "UFlex" or "the Company") is committed to ensuring that its products are designed, manufactured, used, and disposed of in a manner that safeguards health, safety, and the environment throughout their lifecycle. This Policy provides a framework for the responsible handling and usage of the products, thereby contributing to the upkeep of a safe and healthy environment. This Policy strives to provide measures for continuous improvement in the practice of product stewardship.

2. Scope

The policy applies to UFlex Limited and its 100% subsidiaries. The scope of the policy applies to all business units of UFlex covering the entire product lifecycle, from laboratory research, manufacturing, and distribution to end-user usage and disposal. It applies to:

- New product development processes to ensure sustainable design.
- Manufacturing and quality control to minimize environmental and safety risks.
- Consumer engagement and responsible usage of UFlex's products.
- End-of-life management, including recycling and responsible disposal.

3. Definitions

'Product Stewardship' refers to the responsible and proactive management of the health, safety, and environmental aspects of a product throughout its lifecycle.

'New Product Development' refers to the process of defining activities for developing new products from ideation to market launch.

'Product Lifecycle Management' refers to activities related to product introduction, evaluation, modification, and eventual withdrawal from the product portfolio.

'Extended Producer Responsibility (EPR)' is defined by the Organisation for Economic Co-operation and Development (OECD), as a policy approach that makes producers responsible for their products along the entire lifecycle, including at the post-consumer stage.

4. Policy Commitments

UFlex is committed to:

- Complying with all applicable and relevant laws, rules, and regulations governing product stewardship, including Extended Producer Responsibility (EPR) under the Plastic Waste Management Rules, 2016, REACH, OECD Guidelines on Responsible Supply Chain, and ISO 14062 standards, and other applicable standards.
- Ensuring product integrity through sound quality assurance and control measures**.**
- Maintaining compliance across owned and contracted production sites by implementing requisite safety and environmental standards**.**
- Integrating recyclable, compostable, and biodegradable materials into product designs.
- Implementing energy-efficient and waste-reducing production processes.

- Minimizing emissions, water usage, and hazardous waste generation.
- Partnering with suppliers to source sustainable materials and adopt best practices in environmental stewardship.
- Conducting product stewardship awareness programs for customers and stakeholders to promote safe and responsible product usage.
- Partnering with authorized recyclers and waste management agencies for responsible disposal.
- Supporting circular economy initiatives that maximize recyclability and material recovery.
- Monitoring regulatory updates and adopting best practices in product sustainability.
- Suppliers are required to adhere to UFlex's Product Stewardship standards and provide data on material composition, safety, and recyclability information. Regular audits and assessments will be conducted to ensure supplier alignment with UFlex's sustainability objectives.

5. Roles and Responsibilities

The implementation of this policy involves various stakeholders within the organization, this includes:

- **Facility Managers:** Responsible for ensuring compliance with waste management and Extended Producer Responsibility (EPR) obligations at the Company's operational sites.
- **Product Development and R&D Teams:** Responsible for integrating sustainability, safety, and recyclability into product design.
- **Supply Chain and Procurement Team:** Responsible for aligning sourcing practices with sustainable material requirements.
- **Marketing and Sales Teams:** Responsible for educating customers on sustainable product use and end-of-life disposal.

6. Communication and Training of the Policy

This policy is effectively communicated across all relevant business units and seamlessly integrated into UFlex's corporate sustainability framework. To strengthen awareness and accountability, training programs are conducted for employees, suppliers, and other key stakeholders, ensuring a clear understanding of product stewardship responsibilities. Additionally, external stakeholders, including distributors and customers, receive comprehensive guidance on responsible product use, disposal, and recycling practices, reinforcing UFlex's commitment to sustainable lifecycle management.

7. Monitoring and Review

UFlex continuously monitors and updates its product stewardship policy and initiatives to ensure they remain effective, aligned with regulatory requirements, and contribute to the company's sustainability objectives. Regular assessments and stakeholder feedback play a crucial role in refining these efforts. The following measures are undertaken to track and enhance product stewardship performance:

- Periodic assessments are conducted to evaluate the effectiveness of product stewardship initiatives.
- Performance metrics are monitored against regulatory compliance requirements and sustainability goals.

- Feedback from employees, customers, and industry stakeholders is integrated into product stewardship strategies to drive continuous improvement.
- The policy is reviewed periodically to ensure its relevance and effectiveness, with any amendments subject to approval by the Board of Directors.

8. Grievance Mechanism

UFlex has implemented a structured grievance and feedback mechanism to facilitate the reporting of concerns, complaints, and suggestions related to its products and product stewardship practices. Employees and other stakeholders can submit their inputs to the respective Facility Manager(s) or UFlex's Compliance officer through designated channels, including email and written submissions. All grievances and suggestions are systematically documented, reviewed, and addressed in a timely manner, ensuring alignment with established procedures and applicable regulatory requirements.

9. Related Policies

This policy should be read alongside the following policies of UFlex:

- Waste Management Policy
- Environmental Management Policy
- Environment Social Governance (ESG) Policy
- Water Stewardship Policy
- Waste Management Policy
- Sustainable Procurement Policy