



UPL Limited, UPL House  
610 B/2, Bandra Village  
Off Western Express Highway  
Bandra (East), Mumbai 400 051, India

w: upl-ltd.com  
e: contact@upl-ltd.com  
t: +91 22 7152 8000

29<sup>th</sup> February 2024

BSE Limited  
Mumbai

National Stock Exchange of India Ltd  
Mumbai

**SCRIP CODE: 512070**

**SYMBOL: UPL**

**Sub: Disclosure under Regulation 30 read with Schedule III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Dear Sir / Madam,

Pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations"), we hereby inform you that the Company has today received the attached Administrative Warning letter from Securities and Exchange Board of India ("SEBI") pointing out non-compliance with Regulation 30(4)(i)(a) of SEBI LODR Regulations.

The matter refers to the disclosure made by the Company on 13<sup>th</sup> April, 2021 stating that the Supreme Court of Queensland in Australia dismissed a class action litigation against Advanta Seeds Pty Ltd., Company's subsidiary in Australia. On 13<sup>th</sup> October, 2023, the High Court of Australia granted the leave to appeal to the appellants in the said matter. However, no disclosure with regard to the same has been filed by the Company.

In this context the Company clarified that "Litigation" disclosure falls under Clause 8 of Para B of Part A of Schedule III of SEBI LODR Regulations. Further, not only the value of impact of the subject legal case is significantly below the limit of materiality applicable to Para B, but also grant of leave to appeal by High Court of Australia does not change the earlier judgement as communicated by the Company on 13<sup>th</sup> April, 2021. The status that the matter was decided in favour of the Company remains unchanged, hence there is no discontinuity of availability of existing information.

We believe that the Company is fully compliant with the applicable laws and regulatory requirements.

The said letter has no financial, operational or any other implications for the Company.

Thanking you,

Yours faithfully,  
For **UPL Limited**

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

Encl: As above



**General Manager**  
**Supervision Enforcement and Complaints (SEC-V)**  
**Corporation Finance Department (CFD)**

By E-mail/Courier

**SEBI/HO/CFD/SEC-5/OW/P/2024/7292**  
**February 23, 2024**

**The Chairman and Managing Director,**  
**UPL Limited.**

UPL House, 610 B/2, Bandra Village,  
Off Western Express Highway,  
Bandra (East), Mumbai- 400 051.

**Sub: Administrative Warning in relation to non-compliance with the provisions of Regulation 30(4)(i)(a) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations").**

Sir,

1. This has reference to the disclosure made by UPL Limited ("the Company") on April 13, 2021 stating that Supreme Court of Queensland in Australia dismissed a class action litigation against Advanta Seeds Pty Ltd., Company's subsidiary in Australia.
2. In this regard, it is observed that, on October 13, 2023, the High Court of Australia has granted the leave to appeal to the appellants in the said matter. However, no disclosure with regard to the same has been filed by the Company.
3. Therefore, the provision of Regulation 30(4)(i)(a) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR Regulations") which states that one of the criteria for determination of materiality of events/ information is omission of an event or information, which is likely to result in discontinuity or alteration of event or information already available publicly, was not complied with.
4. Above non-compliance has been viewed seriously and you are hereby warned and advised to be careful in future to avoid recurrences of such lapses. Any repetition of the same violation in future will be viewed seriously and appropriate enforcement action would be initiated in accordance with the provisions of the SEBI Act, 1992, the rules or the regulations issued thereunder.





5. The necessary disclosures shall be made forthwith by the Company in accordance with the provisions of the LODR Regulations. Notwithstanding the same, you are also advised to place this letter before the Board of Directors of the Company for necessary action. The Board of Directors may take into consideration this letter for the performance appraisal of the concerned individual who is responsible for such non-compliances.

Yours faithfully,

  
श्री निर्मल मेहरोत्रा

**Shri Nirmal Mehrotra**

