



Product Stewardship at Envu is our commitment

Commitment, Principles and Key Requirements





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A message from our CEO & Head of ESG

As a focused leader in Environmental Science, Envu is committed to protecting the spaces that society and nature share through effective, sustainable innovation.

Our mission is to develop smarter, forward-thinking solutions that help our customers manage public health pests, invasive weeds and devastating plant diseases while minimizing our environmental footprint.

We firmly believe that Product Stewardship is a duty and obligation for all Envu employees. Whether formulating in the lab, securing innovation partners, overseeing production, marketing and selling our products, providing technical support in the field, or simply advocating for Envu solutions, it is incumbent upon all of us to be good corporate citizens and ensure the proper use of our products.

This manual outlines our company's commitment to stewardship throughout the lifecycle of all Envu products and details the operating principles and key requirements that guide our approach to this important responsibility.

We require all employees to read and abide by the principles and guidelines outlined in this document. We also encourage our customers, partners, and industry colleagues to read it to understand how we fulfill our promise of being a good steward of both our innovations and the environment.



**Gilles
Galliou**
CEO, Envu



**Marine
Sanouiller**
Head of ESG, Envu



Introduction

Product Stewardship is the responsible and ethical management of a product, throughout its life cycle, from invention through ultimate use and finally discontinuation. Product Stewardship ensures the availability of high-quality products and services and best practices to ensure compliance with all legal and regulatory requirements, facilitate trade, maximize product potential and sustainability, and minimize risks to human and animal health and the environment.

Envu has adopted a life cycle approach that addresses all major aspects of responsible product management. Envu's Product Stewardship activities include: investing in safety and quality testing of products and services; understanding and maintaining compliance with regulatory requirements as well as with international trade laws and regulations; facilitating trade and commodity marketing; continually improving development, manufacturing, distribution, and production techniques; promoting responsible product use; and implementing initiatives against production, import, trade and use of counterfeit and illegal products and services.

This document outlines Envu Product Stewardship Commitment, Principles and Key Requirements throughout the life cycle for all products and services worldwide and is intended to support all Envu employees to ensure the responsible and ethical development, management and use of Envu products and services. It forms the basis for Introduction Research & Development

Product Stewardship securing Envu business operations through the implementation of stewardship measures and by demonstrating quality management and compliance throughout the product life cycle. This also strengthens partnerships and opens dialogue with key stakeholders (such as regulatory bodies, suppliers, tollers, distributors, end-use customers) creating lasting trust in Envu products and services, maintaining our business foundation over the long term and, ultimately, enhancing public confidence.

The Envu Stewardship Commitment relates to the life cycle of all products commercialized by Envu either by legal entities/ organizations or on behalf of Envu, as well as to services in the Envu portfolio. The established industry view on life cycles by FAO (International Code of Conduct on Pesticide Management; Managing pesticides in agriculture and public health) and Crop Life International (CLI) for pesticides are reflected in the Envu Product Stewardship Cycle (see Figure: Product Stewardship Cycle).

Figure: Product Stewardship Cycle



Commitment

As an industry leader in helping customers in the environmental science sector controlling pests, invasive weeds and diseases, Envu is committed to Product Stewardship as an integral part of its activities, ensuring that its products, services and technologies are safe and sustainable, and their use is environmentally responsible, while meeting customer expectations and needs.

Envu endorses the Food and Agriculture Organization of the United Nations (FAO) Code of Conduct on Pesticide Management, the UN Compact principles as well as the Universal Declaration of Human Rights. These guidance documents, together with participation in industry initiatives – in conjunction with regulatory considerations, provide the basis for the Envu Product Stewardship Commitment.

Envu is committed to:

Responsible Product Development:

- Developing and selling only products and services that have manageable risks to users / operators, consumers, residents and the environment when used according to label instructions.
- Maintaining product quality and genetic integrity.

Responsible Procurement and Manufacturing:

- Educating employees around the whole life cycle for our staff, customers, and other stakeholders.
- Manufacturing products using efficient, safe and environmentally sound production processes.
- Promoting the adoption of equivalent Product Stewardship by those working on behalf of Envu or distributing or licensing Envu products and services.

Responsible Life Cycle Management:

- Utilizing a life cycle approach to manage products and services.
- Using ethical sales and marketing practices.

Responsible Use Training and Customer Stewardship:

- Offering quality products and services that deliver solutions to help users protect and/or enhance public health in a sustainable manner.

- Ensuring products and services are packaged appropriately for the market and with clear guidance on proper use.
- Working in partnership with various stakeholders to promote the responsible use of Envu products and services.

Trade Compliance:

- Evaluating key markets and import activities prior to commercial sale of a product in a country.
- Complying with all relevant legislation and regulations where a product is developed and/or commercialized or marketed by or on behalf of Envu.
- Combating the trade and use of counterfeit and illegal products and services.

Ethics and Transparency:

- Making detection methods (Method of Analysis) for our products available to stakeholders when and where appropriate.
- Having open dialogue with key stakeholders prior to, during and after sale or use of the product.
- Assessing and recording incidents and complaints related to Envu products and services to limit reoccurrence by trend reading, implementing appropriate mitigation measures.

Gilles Galliou
Chief Executive Officer

Tiffany Fremder
Chief Marketing Officer

Bernard Jacqmin
Head of Global Innovation

Troy Randolph
Chief Financial Officer

Dell Joshi
Chief Information Officer

Nadim Mohr
Head of Commercial Operations
for APAC

Ronan Stephens
Global Head of Product Supply

Alex Bernhardt
Chief Transformation Officer

Laura Jacob
Global Head of People, Culture
and Communications

Mark Schneid
Head of Commercial Operations
for North America

Eric Ruggirello
Head of Commercial Operations
for Regions EMEA and LATAM &
Specialty Actives



Implementation

This document covers the Commitment of Envu to Product Stewardship and provides the fundamental Principles and Key Requirements for implementation.

Envu will bring Product Stewardship to the attention of all employees within the company and relevant external partners.



It is the responsibility of all Envu employees to actively promote the appropriate development and use of Envu products and services internally and externally.

Envu will require all employees to follow the Product Stewardship Commitment, Principles, and Key Requirements and to promote them within their field of activity.

Individual employee responsibility – for specific aspects of Product Stewardship that apply to their respective field of activity – is a clear expectation by Envu management.



Independent of any measures taken with respect to compliance with our Product Stewardship Commitment, Principles, and Key Requirements document, all applicable binding statutes, laws, ordinances, rules, regulations, orders or codes of any governmental entities that deal with product safety, occupational health / safety, consumer / resident protection, conservation of landscape, pollution control and other related subjects, must be complied with.

To continuously improve its Product Stewardship approach, Envu will regularly assess the effectiveness of implementation and execution of the Principles and Key Requirements contained in this document. Key Requirements are considered to be dynamic and will be updated as required, taking into account technical, economic, regulatory and societal changes.

Information

For explanations of technical terms, please refer to section: Definitions.



Overview of Product Stewardship Principles



2. Production

Envu identifies and selects Third Party production facilities and sites of an appropriate standard in all countries in which products are toll-manufactured to avoid unacceptable risks to health, safety, and the environment, as well as to use resources efficiently and in compliance with applicable regulations or industry standards. Contractual agreements will include stewardship requirements consistent with Envu internal requirements.



3. Packaging, Storage & Transport

Envu will ensure that packaging is qualified for use with products and that products are stored and transported according to applicable legal and regulatory requirements in a manner that is appropriate for the market and intended use, including guidance on use, storage, and handling consistent with FAO and internal Envu standards.



4. Marketing, Branding, Intellectual Property, Sales & Distribution

Envu will adhere to ethical sales and marketing practices that meet applicable regulations, as well as internal Envu standards. Responsible marketing and sales also involve monitoring the implementation of procedures, systems and processes by all relevant Envu legal entities / legal forms and distributors of Envu products and services.



5. Integrated Pest Management / Resistance Management

Envu will support the implementation of Integrated Pest Management (IPM) measures, including resistance management tools for Envu products and services.



6. Responsible Use

Envu will ensure that appropriate programs are implemented to educate and instruct Envu employees and customers regarding the responsible management of Envu products and services throughout their life cycle.



7. Container Management

Envu encourages safe disposal of empty packages and containers in accordance with local regulations.



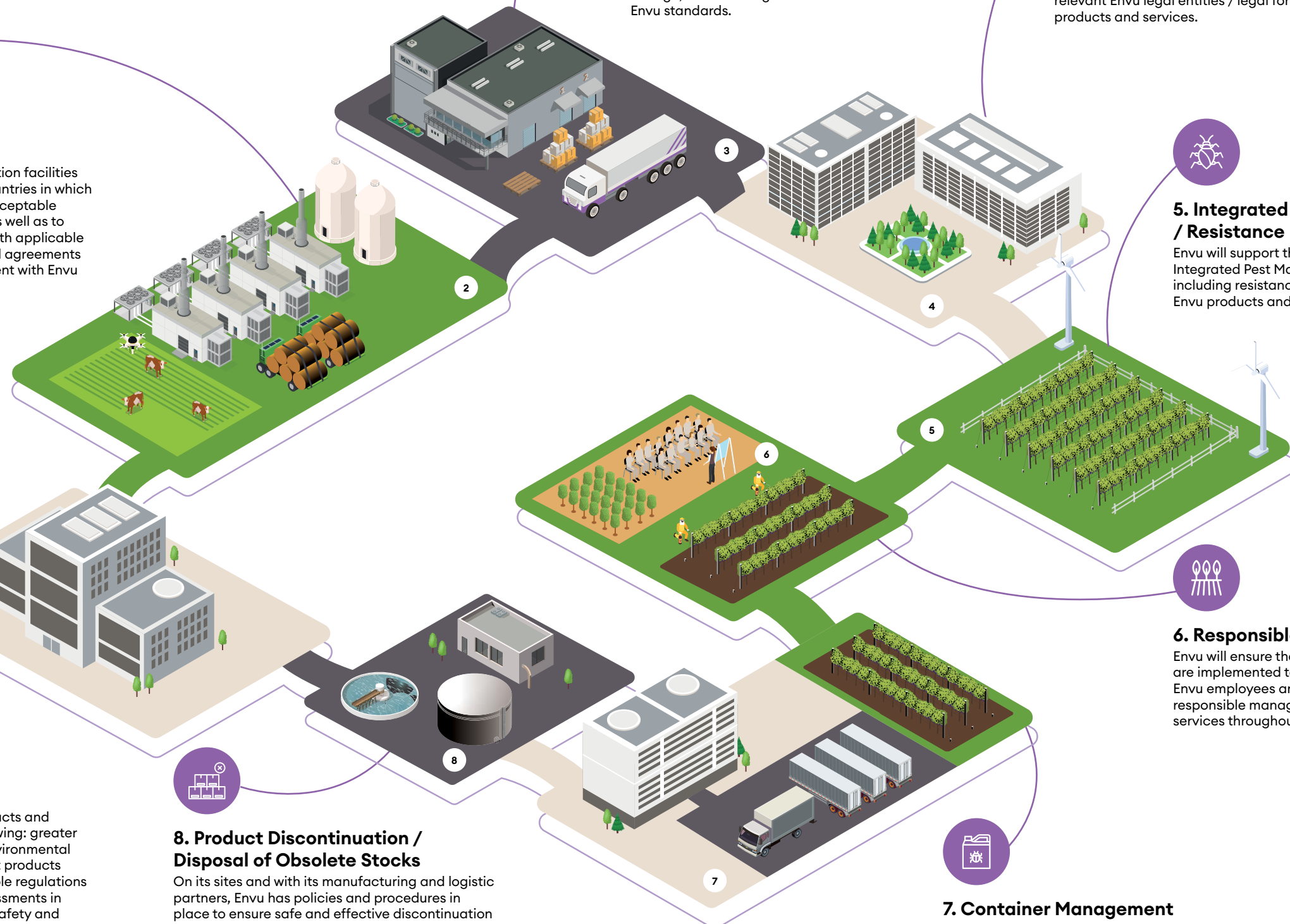
8. Product Discontinuation / Disposal of Obsolete Stocks

On its sites and with its manufacturing and logistic partners, Envu has policies and procedures in place to ensure safe and effective discontinuation of products and services throughout the life cycle, including disposal of obsolete product inventory or waste.



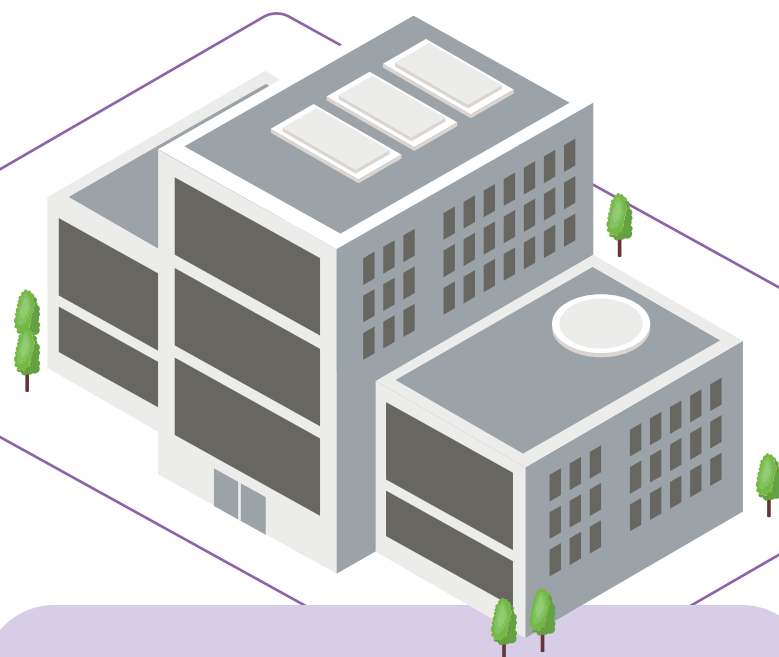
1. Research & Development

Envu aims to develop / offer sustainable products and services that address one or more of the following: greater efficacy, increased productivity, improved environmental and human safety profiles. Envu will ensure that products and services are tested according to applicable regulations and pass robust and comprehensive risk assessments in accordance with the Envu policy on Product Safety and applicable regulatory requirements. Envu will ensure product authorizations in the country where the product is to be sold or used with functioning regulatory systems and will follow accepted industry standards.





Research & Development



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Key Requirements

Envu will strive to develop / offer improved products, services and technologies

- All employees involved in the Research and Development of new products and services will strive to:
 - Develop / offer new products and services with improved toxicological human, environmental and safety profiles.
 - Develop / offer new products and services that improve the use of resources.
 - Develop / offer new products and services with safety profiles suitable for IPM.
 - Enable Healthier spaces and people by: controlling harmful pests, including disease vector ones, and preserving grain and food from spillage.
 - Improvement of wildlife and pollinator habitat, reduced risk of wildfire, increased biodiversity, protection of natural ecosystems, enhance human health (by mosquito management; pest control), protect stored food, enhance human wellbeing (e.g. turf and ornamental).
- Substitute higher risk profile formulants with materials that have lower risk profiles.
- Minimize the risk of unintended release and exposure to non-target areas.
- Develop products, services and technologies that reduce the need for Personal Protective Equipment (PPE).
- Support programs that enhance the availability and affordability of PPE; and align PPE with user education and abilities in the country of sale.
- Develop and support improvement of application technologies and implementation of best practices to avoid unacceptable occupational and environmental exposure.

Envu will test adequately and effectively, ensuring quality and genetic integrity

- Products and services developed / offered will tested and evaluated using recognized, sound scientific procedures and test methods in accordance with or exceeding regulatory requirements and industry standards.
- Information and data from reliable external sources, including peer-reviewed scientific publications, will be considered for the assessment of product performance and safety.
- Where required, country-specific import approvals and testing permits or authorizations for non-registered products or materials will be obtained and followed.
- Procedures will be in place when performing trials to prevent non-registered products from entering the food or feed chain, unless appropriate regulatory approvals are in place.
- Research and development of biological or chemistry technologies, including the use and application of experimental products and services or materials in trials, will only be performed by trained personnel. Experimental product will be labeled to clearly identify the material, meet applicable regulatory requirements and include information on safe handling.
- Processes will be assessed and implemented to help avoid unintended co-mingling or cross contamination of any product.
- Commodities from trials with non-registered products and uses will be destroyed, unless other disposition is allowed by regulations and / or laws.



Envu will obtain registrations where the product is sold as well as obtain import tolerances or import authorizations for key import countries with functioning regulatory systems. Envu will offer products locally registered and / or meeting the Envu safety standards

- Regulatory data packages will be developed and submitted to comply with national and international regulatory requirements before commercialization.
- Regulatory studies will be conducted where high testing standards are in place and, at a minimum, the International FAO Code of Conduct is applied, unless local regulations require otherwise.
- Residue trials / derogation positions for crop protection products will be conducted in accordance with national / regional regulatory requirements prior to marketing. These tests / positions must – at the minimum – be in accordance with Codex Alimentarius and FAO guidelines on good analytical practice and crop residue data in order to provide a basis for establishing appropriate maximum residue limits.
- The potential impact on global import and export trade will be considered; key country import tolerances or import authorizations will be obtained to minimize trade disruptions arising from commercialization of its products.
- Validated methods and training for analysis that ensure identity and key attributes of products (including the respective analytical standards for any active ingredient or formulation) will be made available at an appropriate time to regulatory authorities or other relevant stakeholders on request.
- Regulatory authorities will be provided with new or updated product-specific information that could reasonably impact regulatory conditions or the regulatory assessment and status of the product in a timely manner and consistent with regulatory requirements.

Envu will provide transparent and accurate information for product use

- Proposed use pattern, label claims and directions, packages, and technical literature in local languages will reflect the outcome of scientific tests and assessments and at a minimum comply with all conditions of the applicable authorization and internal minimum requirements, including clarity on the type of application.
- Product containers and related outer packaging will be clearly labeled with adequate and accurate information in accordance with registered or approved uses.
- Product labels will comply with local regulatory requirements for classification and labeling.
- In countries where there are no specific requirements for labeling, products will be labeled in accordance with the Global Harmonized Systems Codes (GHS) and the FAO Guideline on Good Labeling Practice of Plant Protection Products.
- Specific claims on the safety of a product when used as directed are permitted only when local legislation allows and scientific evidence is available to support the claim.
- Product labels will be written in an appropriate language and understandable to end users.
- Product labels will include symbols and pictograms as appropriate.
- Information and instructions will be provided with each product package in adequate language and format to ensure effective risk management during handling, according to local regulations.
- Product labels, use instructions and packaging will include safety text where relevant that includes:
 - Information on appropriate PPE.
 - Information on first aid and medical advice.
 - Warnings against the inappropriate use of empty containers.
 - Instructions on cleaning and safe disposal of empty containers and excess product.
 - Instructions on re-entry timelines with or without PPE to areas where product(s) have been used.
- Product packaging will clearly identify contents and include lot or batch of the product to allow traceability.
- Where relevant, product labels and / or bags / tags will clearly show the identity of the registrant / supplier, including a telephone contact number in case of an emergency.
- Product packaging will carry the release date (month and year) of the lot or batch and provide relevant information on appropriate storage conditions for the product in accordance with national labeling rules and requirements.
- Products sold under specific trademarks and/or brand names will only contain the active ingredient(s), approved by Envu for use under that name in accordance with applicable quality standards.
- Contracts and agreements will be completed with Business Partners to define key requirements or restrictions on product use and include appropriate stewardship and quality provisions that are equivalent to internal Envu requirements for the applicable product(s).





Production

Key Requirements

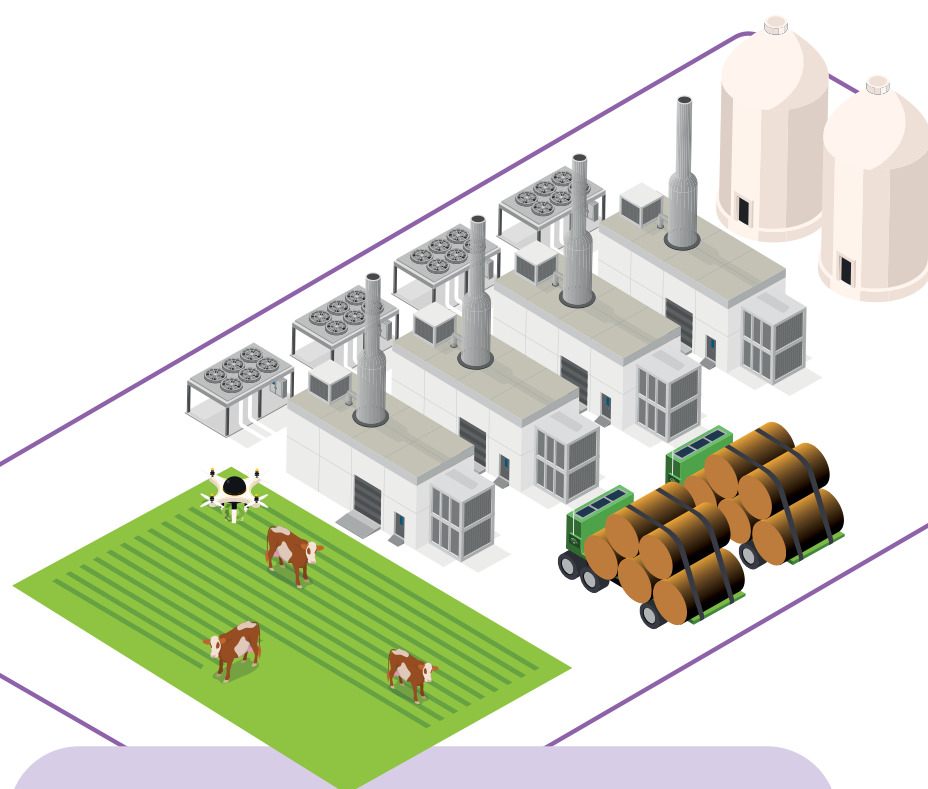
Production sites contracted by Envu will be of a suitable safety standard

- Referring to the Envu supplier Code of Conduct. Each site / location will take all necessary precautions to protect workers, bystanders, nearby communities, and the environment during its operations.
- Each site / location will adopt engineering standards, equipment and operating practices appropriate to the nature of the production operations and the hazards involved and ensure the availability of appropriate PPE.
- The site / location will conduct a formal hazard identification and risk assessment for all existing activities, modifications, substances, new processes, and projects.
- Processes will be designed such that potential risks are minimized, as appropriate, through the selection of materials and process parameters.
- Each site / location where Envu-owned products are handled will have access to current Safety Data Sheets (SDS). Licensed-in products will be supplied / shipped / transported with appropriate SDS as per supply agreement, where Envu relies on suppliers' SDS.
- Safety Data Sheets (SDS), when applicable to an Envu owned product (including products under development), will be provided with Envu product samples when supplied to a third party.

Envu will ensure product integrity through sound quality assurance and quality control measures

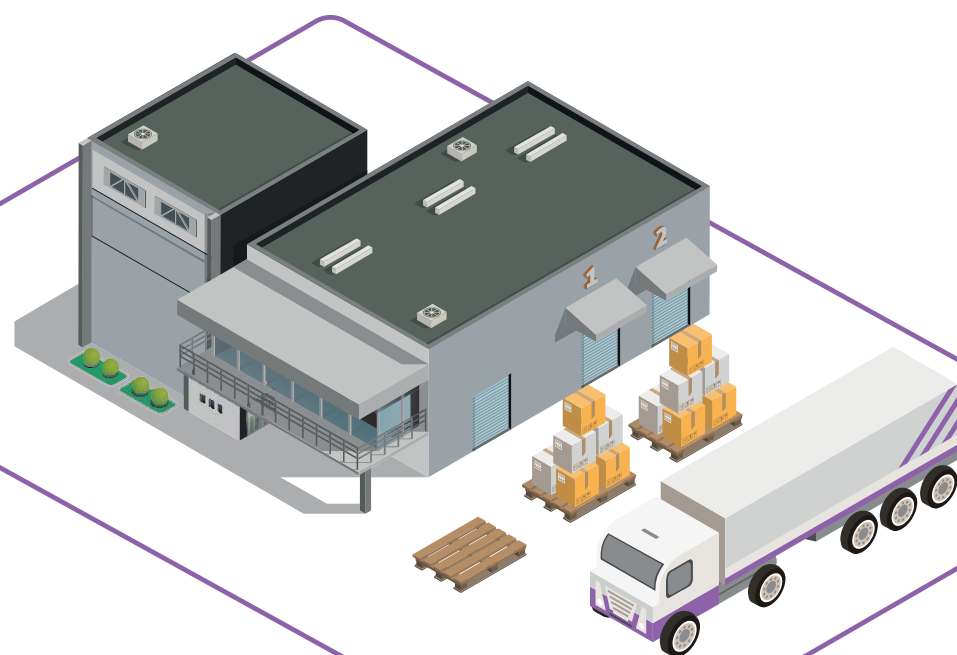
- Quality will be maintained by a clearly defined chain of custody.
- Product identification and traceability procedures will be followed to allow the unique identification of products and raw materials through relevant stages of production, starting with receipt of raw materials, until storage and delivery of the final product.
- Product manufacturing will ensure that the quality meets the registered specification. When Envu becomes aware that a product does not meet specifications, corrective actions in accordance with relevant regulations will be taken.
- Formal changes to materials, process and / or equipment occurring at production of Envu owned products will follow a management of change process, which is reviewed and approved by relevant stakeholders / processes by Envu prior to implementation.
- Every reasonable precaution will be taken to ensure that Envu products do not contain residual impurities in the form of additional active ingredients, microbial contaminants, or other impurities at levels that will impact safety, efficacy, customer acceptance, usability, or render the products non-compliant with applicable country laws.
- Product quality standards will be defined to ensure that the product produced meets and conforms with applicable regulatory, industry and internal Envu standards.
- Quality control methods will be followed to ensure that product quality standards are met before product is released for sales.

Production facilities and sites selected by and manufacturing on behalf of Envu will be of an appropriate standard to minimize risks to health, safety and the environment, as well as to use resources efficiently and in compliance with applicable regulations or industry standards. Contractual agreements will include stewardship requirements consistent with the Envu Supplier Code of Conduct.





Packaging, Storage & Transport



Envu will ensure that packaging is qualified for use with products and that products are stored and transported according to applicable legal and regulatory requirements in a manner that is appropriate for the market and intended use, including guidance on use, storage and handling consistent with FAO and internal Envu standards.

Key Requirements

Envu will ensure safe storage and transport

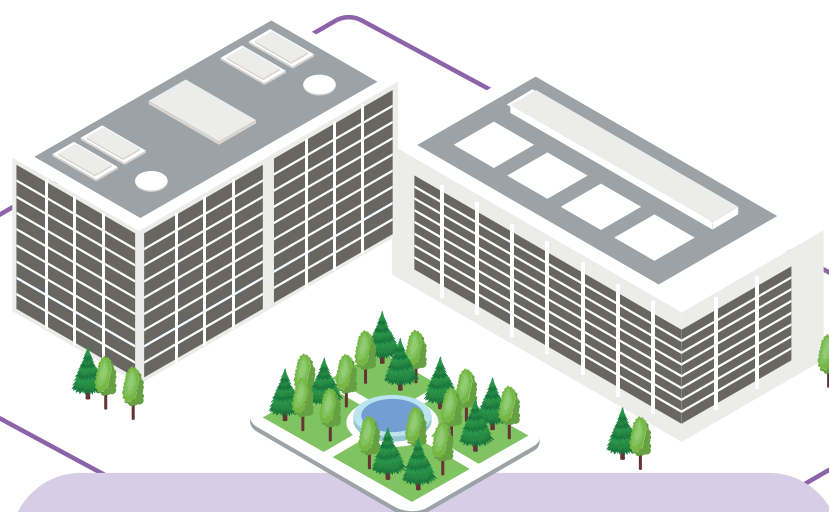
- Storage and transport will be in approved containers and in compliance with international and / or national standards on the transport of dangerous goods by air, sea, road, rail or inland waterways when applicable for the product.
- Chemical Products will not be transported in the same container or compartment as food, drugs, toys, clothing, cosmetics or household goods.
- Will promote the implementation of measures to ensure suitability of vehicles and safe storage and securing, as well as traceability of the load, including contamination prevention requirements.
- Storage and transportation requirements of products will be based on the properties of the materials and will comply with applicable local requirements and regulations.
- Business Partners who provide transport and storage facilities will be contractually obligated to follow procedures in compliance with applicable local regulations.

Envu packaging materials will be in accordance with applicable legal requirements, FAO guidelines and internal standards

- The development and use of packaging materials for purchased goods, intermediates and finished products must take the following aspects into account:
 - Quality
 - Resource conservation
 - Transport safety
 - Testing chemical compatibility between pack material and formulation
 - Safety in operation (filling, handling and application)
 - Use of combinations of packaging materials that support recycling
 - Use of packs that allow complete emptying and rinsing to support recycling in a manner that is safe for the handler
- Containers for Envu products that can be easily opened by children will not be used.
- A reasonable range of pack sizes and types will be provided that are appropriate to the needs of customers.
- Ready-to-use packages or format will be used for Envu products when reasonably possible and consistent with our sustainability commitments.
- Products of adequate quality, packed and labeled as appropriate for each specific market will be supplied.



Marketing, Branding, Intellectual Property, Sales & Distribution



Envu will adhere to ethical sales and marketing practices as per policy 'Commercial Management 2.03' that meet applicable regulations, as well as internal Envu standards. Responsible marketing and sales also involve monitoring the implementation of procedures, systems and processes by all relevant Envu legal forms and encourage distributors and customers of Envu products and services to act similarly.

Key Requirements

Envu will comply with laws, regulations and good business practices

- Comply with all applicable laws and regulations dealing with marketing practices, the applicable global, regional and local industry codes of conduct relevant for our business, and all guidelines in the Envu compliance handbook.
- Take reasonable efforts to combat counterfeit activities related to the production and formulation, export and import, any kind of transportation, distribution, sale and use of products and services.
- Evaluate demand for a product in the country of sale prior to providing the product to avoid building up obsolete stocks.
- Follow legal and regulatory requirements, as well as industry and internal Envu standards, when introducing products and services in countries of sale.
- Recommend, advertise and promote only products/product uses that have been registered or authorized in the country of sale. This includes online sales. Additionally, these products may be subjected to a directed use or stewarded program if use of the product is not yet authorized for import of food and feed commodities in applicable import countries.
- Use appropriate business practices and industry standards for products and services that do not need a registration or authorization.
- Recommend only lawful uses of a product. All promotion and brand communication claims will comply with applicable laws and will be technically substantiated.
- Make announcements of expected regulatory decisions or technical / educational publications on a product prior to authorization for sale in a country, provided they comply with national rules and regulations.

Envu will be honest and reliable

- Advertising, promotion and informational materials will be understandable, clear and consistent irrespective of form or forum. They will not contain any statement or visual presentation, which, directly or by implication, omission, ambiguity or exaggerated claim, is likely to mislead or create misunderstandings by buyers / users.
- Advertising of products and services that are legally restricted to be used only by trained or registered operators will not be publicly advertised through journals other than those catering to such operators, unless the restricted availability is clearly and prominently mentioned.
- Advertising material will only contain representations that reflect the proper use of the product and not contain any visual presentation of potentially dangerous practices.
- Statements on efficacy, yield and performance will not be made without a qualifying phrase, such as "when product is used as directed."
- Advertising material will not include comparison with brand names of competitors unless this is allowed by national laws. False or misleading comparisons with competitor products and services will not be made.
- All advertising and promotional materials will undergo internal review for accuracy, appropriateness and compliance before being released outside the company.



Envu will listen attentively and communicate appropriately

- Proper information about any risk associated with Envu products and services will be transparently communicated in accordance with industry practices and relevant legal requirements.
- Interactions with customers and stakeholder groups will be responsible and transparent.
- Outside views and feedback will be actively sought and considered.

Envu cares about people, safety, quality and the environment

- Systems and processes, including complaint and incident management, will be implemented and monitored regularly to review marketing and business operations to assure the highest quality of Envu products and services, as well as to safeguard people and the environment.
- Reasonable market monitoring, entry and control will be implemented to mitigate risk related to counterfeit and illegal products and services.
- Marketing of products will be adapted to the extent required by risk evaluations. If necessary, labels, promotion activities and sales will be adapted accordingly, including targeted sales restrictions.
- Sales will be stopped and products recalled, if handling or use according to label is found to pose an unacceptable risk to human health, the environment or product quality, and these risks cannot be mitigated through stewardship or other appropriate measures.
- Recall procedures will be in place for all businesses/products at global and local levels, so that any recalls that become timely manner.
- Corrective actions will be implemented where improvements to systems and processes are identified.

Envu will enable Business Partners to fulfill the Stewardship requirements for Envu products and services

- Business Partners who handle Envu products and services will contractually be required to implement Product Stewardship that is equivalent to Envu internal standards and that meet relevant regulatory requirements and industry standards.
- When commissioning relevant Business Partners as suppliers, Envu will endeavor to ensure that they apply the same quality standards that are applied by Envu.
- New Business Partners contracted to toll manufacture Envu products will have an evaluation of their equipment, quality control, and qualification of personnel against existing industry standards, applicable regulatory requirements and internal Envu standards, and may need to have a site inspection to ensure these are understood and capable of being followed.
- Business Partners who toll, supply, handle, and transport Envu products agree to implement an efficient due diligence process to prevent participation in activities related to counterfeit and illegal products. Business Partners who license Envu technologies will agree to adhere to Envu contractual stewardship requirements and to produce products and services containing Envu technologies that meet Envu quality assurance standards.
- Steps will be taken to avoid child labor at Envu and Business Partner operations, consistent with the International Labour Organization's (ILO) 2 core labor standards and the United Nations Global Compact principles. The term "child" refers to any person under the age of 15 (or lower according to the applicable local laws), or under the minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is the highest.
- Technical and commercial Envu staff will provide the appropriate advice, support and training to their Business Partners on an as-needed basis, such that they are adequately qualified to present accurate information on Envu products and services to their customers.
- Business Partners who are asked to supply analytical grade standards to third parties conducting studies on Envu products, must utilize an Envu authorized source.
- The data privacy protection of customer or consumer information supplied to Envu by Business Partners will be observed and meet the applicable legal requirements.
- Ensuring our products are used safely and according to label instructions is a priority for Envu. Serving that purpose, our Technical Service teams are supporting commercial teams and customers on ensuring products are used safely.

Envu supports strong and effective intellectual property protection

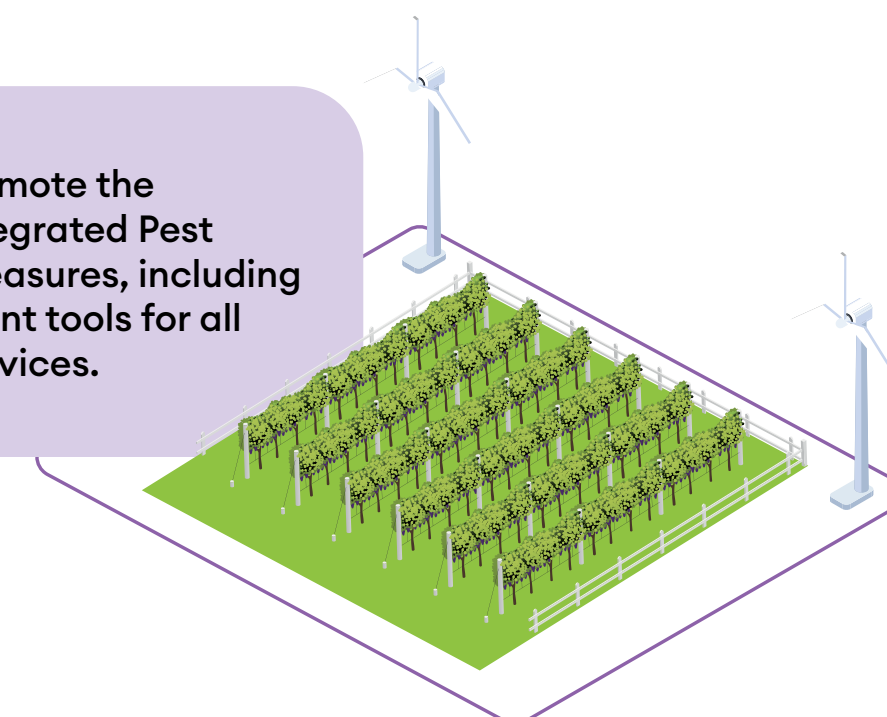
- Innovation owned by Envu will effectively be protected by patents, trade secret or other means. Details on innovation at Envu will be considered confidential and not disclosed unless relevant agreements and applicable Envu internal approvals are in place.
- Intellectual property rights of third parties will be reviewed and monitored by Envu to assess if they are relevant to Envu owned products and services or activities and require negotiation to access the innovation or require action to prevent infringement on protected Envu innovation.
- When made aware of intellectual property infringements by third parties or those related to counterfeit and illegal products and services, Envu will take appropriate actions to stop the infringing or illegal activities.





Integrated Pest Management / Resistance Management

Envu will support / promote the implementation of Integrated Pest Management (IPM) measures, including resistance management tools for all Envu products and services.



Key Requirements

Envu will promote resistance management

- Envu will develop, position, and promote IPM solutions in the market for its products and services.
- Envu will develop, communicate, and implement resistance management guidance based on the mutually agreed principles of CropLife and Resistance Action Committees to prolong the effectiveness of products and limit the impact should resistance occur. This includes the consideration of available technologies, such as chemical and biological products / control methods.
- Envu will train users, distributors and other stakeholders such as professionals on Resistance Management and on IPM.
- Envu will undertake research to understand how resistance mechanisms work, how resistance evolves, and how it can be managed to optimize the discovery of new modes of action and to create integrated solutions.
- Envu will collaborate with other stakeholders (e.g., universities) to better understand local resistance dynamics, and together, craft the best product strategies and tailor solutions for products / services for customers, users of Envu.



Responsible Use

Key Requirements

Envu will implement training programs for staff and customers

- The use of Envu products and services, and the occurrence of any problems arising from the use of the products and services, will be actively monitored to potentially identify the need for changes in labeling, directions for use, formulation or product availability.
- Where compulsory country training and accreditation requirements are absent or inadequate to ensure safe and responsible use of products and services, Envu will support the responsible use of its products and services through the implementation of appropriate training measures, either through its own activities and / or those of industry associations, and through collaboration with various stakeholders, including governments and extension services.
- Training programs will emphasize proper use of Envu products and services and, as appropriate and relevant, include information on:
 - Hazards and risks
 - Symptoms of product-related poisoning
 - Actions to take in case of emergency
 - Use of recommended personal protective-clothing / equipment (PPE)
 - Clean-up of product spills
 - Personal hygiene
 - Correct transportation and storage of products during distribution
 - Correct way to prepare products and services for use
 - Recommended application techniques
 - Calibration, use, cleaning and maintenance of equipment
 - Correct cleaning of empty containers
 - Correct disposal of waste products and empty / cleaned containers
 - Measures to protect the environment, non-target organisms and water sources
 - Minimizing exposure and risk to people and animals
- All staff involved in marketing, promotion, selling or giving advice on Envu products and services will be adequately trained to present accurate and valid information on the products and services sold, as well as understand laws, regulations, internal standards relevant to the commercial use, and marketing of the product.
- Best management practices for the safe handling and proper application of Envu products and services will be actively promoted by Envu staff to customers and users of the products and services, including promoting the use of proper PPE.

Envu will ensure that appropriate programs are implemented to train and instruct Envu employees and customers regarding the responsible management of Envu products and services throughout their life cycle.





Envu will not support, encourage or tolerate any unapproved use of Envu products and services or technologies

- When aware of an unapproved use, Envu will promptly take steps to correct the situation, prevent reoccurrence and, as relevant, report to external stakeholders or regulatory authorities.

Envu will take measures to prevent and manage incidents

- Reasonable and practical measures will be taken by Envu to prevent incidents involving Envu innovation and commercial activities.
- Should an incident occur, the country / country cluster organization will:
 - Assess all reported accidental or intentional exposures in which Envu products and services may be implicated and if they are found to have been involved, and as appropriate, complete an incident report in accordance with internal Envu standards.
 - Address reported incidents in a comprehensive and timely manner.
 - Implement measures to reduce the likelihood of reoccurrence.
 - Report them to corporate leadership as required by internal Envu standards.
- Procedures and trainings will be in place with Business Partners to promptly respond to incidents involving Envu products and services and report to the Envu organizations acting as commercial / contact point to Business Partners.
- Procedures for incidents will include possible communications to potentially impacted stakeholders, such as downstream partners, regulators.
- In alignment with global Adverse Events Management, the respective Envu organization will inform and cooperate with national authorities, users and Poison Control Centers to enable prompt remedial action.
- On demand, updated SDS for products will be provided in an appropriate language to Poison Control Centers or other responsible organizations, to regulatory authorities, transport companies, distributors, retailers and, if requested, end users. This applies to all Envu products sold or supplied by, or on behalf of Envu.





Container Management

Envu will support programs to safely recycle and, if not feasible, encourage safe disposal of empty packages and containers in accordance with local regulations.



Key Requirements

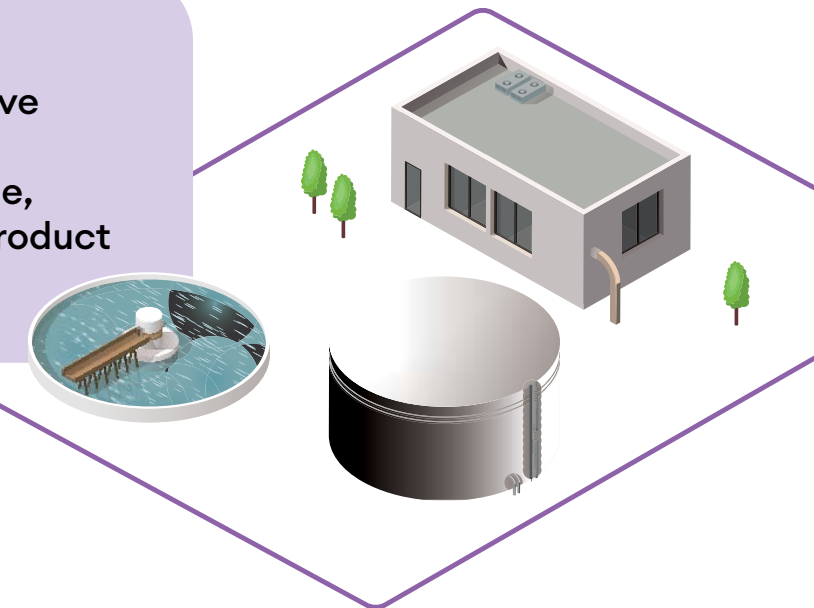
Envu will support container management

- Container design will support safe disposal in accordance with:
 - National rules and regulations where they exist.
 - FAO Code of Conduct on Pesticide Management, if national rules and regulations do not exist.
 - CropLife International (CLI) guidelines, if not covered by the FAO Code of Conduct on Pesticide Management.
- Cleaning steps will be defined in product use guidance for Envu products to enable empty, cleaned product containers to be treated as non-hazardous waste.



Product Discontinuation / Disposal of Obsolete Stocks

Envu will have procedures in place to ensure safe and effective discontinuation of products and services throughout the life cycle, including disposal of obsolete product inventory or waste.



Key Requirements

Envu will discontinue products and services at the end of their life cycle

- Processes will be in place to ensure a smooth discontinuation of Envu projects and / or products and services.
- Throughout the discontinuation phase, Envu will comply with and ensure that appropriate regulatory permits, conditions and/or approvals are maintained and, as appropriate, will continue for a defined period after commercial discontinuation to sufficiently mitigate the issue of unintended presence that could lead to trade disruption.

Envu will support safe disposal of obsolete product stocks

- Dispose of excess and obsolete internal materials consistent with regulatory and industry standards.
- Participate in programs together with other stakeholders, such as retailers, distributors and authorities, to prevent products supplied by Envu from becoming obsolete stocks.
- Assist in disposing of obsolete stocks of Envu products in an environmentally sound manner through multilateral cooperations and/or through industry associations.

Definitions

Active Ingredient

means the biologically active part of the product.

Advertising

means the promotion of the sale and use of products via printed and electronic media, signs, displays, gifts, demonstration, or word of mouth.

Application

means the actual physical delivery by a technical aid, equipment or machinery of a product to the target organism, or to the place where the target organism comes into contact with the product.

Biocidal Product

are used to protect humans, animals, materials or articles against harmful organisms like pests or bacteria, by the action of the active substances contained in the biocidal product.

Biologics

means products that are manufactured from or containing materials isolated from nature. Examples include bacteria, fungi, inoculants, natural products, and double stranded RNA.

Business Partners

include suppliers, toll manufacturers, distributors, agents, retailers, formulators, co-marketers, licensees.

Container

means any object used to hold an Envu product, including herbicides, insecticides, fungicides, biologicals or otherwise.

Compliance

means full adherence to, and implementation of, legal, regulatory and company requirements.

Crop Protection Product

is a product that protects crops from pests during crop production including post-harvest.

Disposal

means any operation to recycle, neutralize, destroy or isolate product waste, obsolete stocks, used containers and contaminated materials.

Distribution

means the process by which products are supplied through trade channels to national or international markets.

Environment

means surroundings, including water, air, soil and their interrelationship, as well as all relationships between them and any living organisms.

Environmental Science

Environmental science is an interdisciplinary field that focuses on the study of the natural environment, including the interactions between living organisms and their surroundings. Disciplines span environmental chemistry, ecology, environmental policy and management, conservation biology, atmospheric science, and geoscience. This includes the scientific study of substances designed to control or eliminate pests, such as insects, weeds, and fungi, that can harm crops or affect human health. It also involves evaluating the regulatory frameworks governing the use of these solutions to ensure that the benefits of pest control are achieved without causing undue harm to the environment and human health.

Environmental scientists analyze, assess, and address environmental issues and challenges, such as climate change, deforestation, loss of biodiversity, and resource depletion with the ultimate goal of finding sustainable solutions to promote the well-being of both the natural world and human societies.

Extension Services

means the entities in a country that are responsible for the transfer of information, technology advice and training regarding the improvement of agricultural practices, including the production, handling, storage and marketing of agricultural commodities.

Facilities

mean any place or operation where active ingredients or products are manufactured, held, stored, marketed, sold, distributed, transported, used or disposed of, or where records relating to such activities are maintained.

Food and Agriculture Organization of the United Nations (FAO) International Code of Conduct on Pesticide Management

means the framework on pesticide management for all public and private entities engaged in, or associated with, production, regulation and management of pesticides. The Code provides standards of conduct that serve as a point of reference in relation to sound pesticide life cycle management practices, in particular for government authorities and the pesticide industry.

Formulation

means the combination of various ingredients designed to render the active ingredient useful and effective for the purpose claimed; it is the form of the product purchased by end users.

Globally Harmonized System (GHS)

establishes new classification criteria for physical, health and environmental hazards, along with associated hazard communication elements, notably pictograms, signal words and hazard statements for use on labels. It is an international system created by the United Nations and based on harmonizing major existing systems for classifying and labeling.

Hazard

means the inherent property of a product related to its physico-chemical and toxicological properties towards human beings and the environment.

Highly Hazardous Pesticides (HHPs)

means pesticides that are acknowledged to present particularly high levels of acute or chronic hazards to health or environment, according to internationally accepted classification systems, such as World Health Organization (WHO) or United Nations guidance on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), or to their listing in relevant binding international agreements or conventions. In addition, plant protection products that appear to cause severe or irreversible harm to human health or the environment under conditions of use in a country may be considered to be, and treated as, highly hazardous.

Incident

means an unintended event or occurrence that disrupts or has the potential to disrupt operations, commerce, health and safety, the environment, and/or result in non-compliance with relevant regulations or standards for the industry or product.

Integrated Pest Management (IPM)

means the careful consideration of all available pest control techniques and subsequent integration of appropriate measures that discourage the development of pest populations and keep pesticides and other interventions to levels that are economically justified and reduce or minimize risks to human and animal health and / or the environment.

Label

means the written, printed or graphic matter on, or attached to, the product or the immediate container thereof and also to the outside container or wrapper of the retail package of the product that provides use requirements and required product information.

Life Cycle

means all the stages a product might pass through from initial invention through to final product discontinuation. The life cycle includes research and discovery, manufacture, formulation, packaging, distribution, storage, transport, use, degradation in the environment, and final disposal of obsolete stocks and / or used containers.

Manufacturer

means a corporation or other entity in the public or private sector or any individual engaged in the business or function of manufacturing components of a product and / or a final product.

Marketing

means the overall process of product promotion, including advertising, product public relations and information services, as well as the distribution and sale on national or international markets.

Maximum Residue Limit (MRL)

means the maximum concentration of a residue that is legally permitted or recognized as acceptable in or on a food or agricultural commodity or animal feedstuff. The MRL is set at a value that is unlikely to be exceeded if the product creating the residue is used according to product label.

Monitoring

means collection and analysis of information on the status of, for example, compliance, environmental conditions, or public health events, such as poisoning incidents.

Packaging

means the container together with the protective wrapping to carry products via wholesale or retail distribution to users.

Personal Protective Equipment (PPE)

means any clothes, materials or devices that provide protection from product exposure during manufacture, handling and application. In the context of the International Code of Conduct on the Distribution and Use of Pesticides, it includes both specifically designed protective equipment and clothing reserved for product application and handling.

Pest

means any species, strain or biotype of plant, animal or pathogenic agent injurious to plants and plant products, materials, or environments and includes vectors of parasites or pathogens of human and animal disease, and animals causing a public health nuisance.

Poison

means a substance that can cause disturbance of structure or function, leading to injury or death when absorbed in relatively small amounts by human beings, plants or animals.

Poisoning

means occurrence of damage or disturbance caused by a substance and includes intoxication.

Product

means a plant protection product, a public health pest management product, biological materials, and other components in the form in which they are sold.

Quality and Genetic Integrity

means characterized by approved methods at the phenotypic and genotypic level to ensure quality, purity and identity to agreed standards.

Registration

means the process whereby the responsible national government or regional authority approves the sale and use of a plant protection or pest management product following the evaluation of scientific data aimed at demonstrating that the product is effective for its intended purposes and does not pose an unacceptable risk to human or animal health or the environment under the conditions of use in the country or region.

Regulations

mean the more detailed implementing provisions usually issued by the administrative authorities to describe the specific means by which the regulated community is required to carry out the provisions of legislation.

Residue

means any specified substances present in or on food, agricultural or other types of commodities, or animal feed, as well as in environmental media, including soil, air and water deriving from the

use of a plant protection or pest management product. The term includes any derivatives of a plant protection product, such as conversion products, metabolites, breakdown products, reaction products and impurities considered to be of toxicological or ecotoxicological significance. The term “pesticide residue” includes residues from unknown or unavoidable sources (e.g., environmental contamination), as well as known, authorized uses of the chemical.

Resistance

means the naturally occurring, inheritable adjustment in the ability of individuals in a pest population to survive a treatment with or exposure to a plant protection or pest management product that would normally give effective control.

Responsible Care

is a worldwide initiative by the chemical industry where all employees are requested to act in line with corporate environmental protection and safety objectives and implementing innovative solutions with the aim of achieving continual improvements in health care, safety and environmental protection.

Risk

is the probability of occurrence of an undesirable event resulting from the use of a product, taking into account implemented mitigation measures.

Sustainability

Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

UN Brundtland Commission, 1987
(Sustainability | United Nations)

Unapproved Use

means the use of a product that is not as per label or country registration requirements or in a location where it is not authorized for use.

Use Pattern

means the combination of all factors involved in the use of a product, including the concentration of active ingredient in the preparation being applied, rate of application, timing of treatment, number of treatments, interval between treatments, use of adjuvants, and methods and sites of application, which determine the quantity applied, timing of treatment and interval before harvest.

World Health Organization (WHO)

or United Nations guidance on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS).



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References

- International Code of Conduct on the Distribution and Use of Pesticides (revised version), Food and Agriculture Organization of the United Nations; Rome, (revised version of 2014)
- General Data Protection Regulation -<https://gdpr.eu>
- Global Policy: Global Commercial Management – No.: 2.03
- Global Policy: Product Safety – No.: 3.02
- Global Policy: Compliance book
- Global Policy: Supplier code of conducts – No.: 1.08
- Global Policy: Compliance Management – No.: 1.09
- Global Policy: Occupational Health & Safety - No.: 3.01
- Global Policy: Environment - No.: 3.06
- FAO: The International Code of Conduct on Pesticide Management, (<https://www.fao.org/pest-and-pesticide-management/pesticide-risk-reduction/code-conduct/en/>)
- Responsible Care initiative of the International Council of Chemical Associations
- Universal Declaration of Human Rights
- United Nations Compact principles (<https://unglobalcompact.org>)



Notes



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