

TRIDENT LIMITED

Name of the Policy	Business Responsibility and Sustainability Policy
Policy Custodian	Company Secretary
Date of Latest amendment/review	• May 21, 2025 • May 19, 2026

BUSINESS RESPONSIBILITY AND SUSTAINABILITY POLICY

SCOPE AND PURPOSE

Trident Limited (“Trident” or “The Company”) is governed by the Companies Act, 2013 (“The Act”), the Rules and Regulations framed thereunder by Ministry of Corporate Affairs (“MCA”) and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“LODR Regulations”). In accordance with Regulation 34 of the LODR Regulations and other applicable provisions (including any statutory enactments/ amendments thereof), the Company has adopted the Business Responsibility and Sustainability Policy (“BRS Policy”) to ensure that the Company contributes towards sustainable development and fulfills its social, environmental and economical responsibilities.

Regulation 34 of the LODR Regulations mandates top 1000 listed companies (by market capitalization) to include a Business Responsibility and Sustainability Report (BRSR) as a part of their Annual report.

Provided that the assessment or assurance of the specified parameters as per the Business Responsibility and Sustainability Report Core shall be obtained, with effect from and in the manner as may be specified by the SEBI from time to time.

Provided further that the listed entities shall also make disclosures and obtain the assessment or assurance of the specified parameters as per the Business Responsibility and Sustainability Report Core for their value chain, with effect from and in the manner as may be specified by the SEBI from time to time.

SEBI had introduced format of the Business Responsibility and Sustainability Report (BRSR) and BRSR Core as per National Guidelines for Responsible Business Conduct (“NGRBC”) on ESG parameters.

This BRS Policy affirms the Company’s commitment to follow all the 9 (Nine) principles laid down in the NGRBC on Social, Environmental and Economic responsibilities of Business published by the Ministry of Corporate Affairs towards conducting its business.

The purpose of BRS Policy is to create a framework based on these nine principles in combination of existing policies, SOPs, protocols and other internal documents. All the relevant stakeholders shall be informed about BRS Policy by publishing it on the website of the Company.

The BRS Policy has been formulated by the management of the Company in consultation with the relevant stakeholders and has been approved by the Board of Directors of the Company at its meeting held on May 21, 2025.

APPLICABILITY

Based on market capitalization, the Company is falling under top 1000 companies and hence, the Company has formulated a BRS Policy.

IMPLEMENTATION

Business Responsibility and Sustainability Initiatives of the Company shall be undertaken under the supervision of Corporate Social Responsibility Committee of the Board of Directors which shall also oversee the implementation of the Policy. The Managing Director shall be BRS head under the Policy. He may take support of such functional heads and internal and external experts, which he may deem fit, for the effective implementation of the Policy. Subsidiaries /stepdown subsidiaries of the Company may participate in the Policy to the extent required under the laws of the country of their operation.

The compliance with the Policy shall be monitored and evaluated on regular basis at least once in a year. Respective Functional Heads will formulate action plan / checklist to ensure compliances of the various principles enunciated in this Policy.

For any query/grievance/suggestion/ feedback, write to us at investor@tridentindia.com.

POLICY AMENDMENTS

Any subsequent amendment / modification in the LODR Regulations, NGRBC and / or other laws in this regard shall automatically apply to these Policy. The same shall be added / amended / modified from time to time as authorized by the Board of Directors.

The Managing Director or his delegate(s), is/are authorized to amend or modify the Policy subject to the approval of the CSR Committee and Board of Directors of the Company, in whole or in part, from time to time.

KEY PRINCIPLES

Company believes that the business excellence can be achieved only by doing business on sound sustainability principles that address the dimension of good governance as well as environmental and social responsibility. Company's Business practices would therefore be governed by the following guiding principles:

PRINCIPLE 1: ETHICS, TRANSPARENCY AND ACCOUNTABILITY:

The Company is committed to conduct its business in compliance with applicable laws, rules and regulations, while upholding the highest standards of business ethics. The Company has in place the Code of Business Conduct and Ethics ("Code") for its Directors and Senior Management Personnel and their confirmations to the Code is obtained by the Company on periodical basis. The Company has established a vigil mechanism for Directors and employees to report concerns about unethical behavior, actual or suspected fraud in violation of the Company's code of conduct or ethics, policies, improper practices or any other alleged wrongful conduct in the Company.

The Company undertakes regular sensitization initiatives to enhance employee awareness of key regulatory frameworks, including the SEBI (Prohibition of Insider Trading) Regulations, 2015 and other applicable laws.

The objective of this policy is to ensure the highest standards of ethical conduct, transparency and accountability while dealing with the stakeholders.

POLICY

1. The Company should develop and put in place structures, policies and procedures that promote this Principle, prevent its contravention and effect prompt and fair action against any transgressions.
2. The Company should ensure that the Principles of these Guidelines are understood, adopted and implemented throughout the operations of their business.
3. The Company should also promote the adoption of this Principle across the value chain of their business.
4. The Company should disclose and communicate transparently and enable access to information about the policies, procedures, performance (financial and non-financial), and decisions of their enterprise, that impact their stakeholders, especially those that are most at risk to business impacts and communities that are vulnerable and marginalized.
5. The Company should take responsibility for meeting all its statutory obligations in line with the spirit of the law, enabling fair competition and ensuring it treats all its stakeholders in an equitable manner.
6. The Company should ensure that the business avoids complicity with the actions of any third party that violates any of the Principles contained in these Guidelines.

7. The Company should put in place appropriate structures, policies and procedures to address conflicts of interest involving its members, employees and business partners.
8. The Company should put in place appropriate structures, codes, policies, and procedures to ensure that the business does not engage in illegal and abusive practices, bribery and corruption, and ensure timely and fair action in case such transgressions are detected.
9. The Company should ensure that the business contributes to public finances by timely and complete payment of all applicable taxes in the letter and spirit of the laws and regulations governing such payments.

COMPANY'S OTHER POLICIES/SOPS SUPPLEMENTING THIS PRINCIPLE:

Code of Business Conduct and Ethics for Officers of the Company, Vigil Mechanism & Whistle Blower Policy, Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information, Related party transactions policy, Policy for determining material subsidiary, Code of Conduct for regulating, monitoring and reporting of Trading by Designated Persons and their immediate relatives, Risk Management Policy, Policy for determination of materiality of events or information, Familiarization Programme for Independent Directors, Dividend Distribution Policy, Corporate Social Responsibility Policy, Policy on Preservation of Documents, Nomination and Remuneration Policy, Website Content Archival Policy, Anti-Corruption and Anti Bribery Policy.

PRINCIPLE 2: PRODUCT/SERVICE SAFETY AND LIFE CYCLE SUSTAINABILITY:

The Company aims to promote a culture where all efforts are directed towards providing good quality and safe products to all our customers. We also endeavor to provide a safe environment for all stakeholders at our premises. Sustainable development integrates economic progress, social responsibility and environmental concerns with the purpose of improving quality of life.

POLICY

1. The Company shall assure safety and optimal resource use over the life-cycle of the product from design to disposal and ensure that everyone connected with it viz. designers, producers, value chain members, customers and recyclers are aware of their responsibilities.
2. The Company shall raise the consumer's awareness of their rights through education, product labelling, appropriate and helpful marketing communication, full details of contents and composition and promotion of safe usage and disposal of their products and services.
3. The Company should provide stakeholders across the value chain with adequate information about environmental and social issues and impacts across product life cycle from design to disposal. This may be done through appropriate and relevant tools such as certifications, labels, ratings and other communication and disclosure platforms including reports, websites, etc.
4. The Company should, in designing, producing and making available goods and services, endeavour to ensure that resource-efficient and low-carbon processes and technologies are deployed to minimize adverse environmental and social impacts.
5. The Company shall regularly review and improve upon the process of new technology development, deployment and commercialization, incorporating social, ethical, and environmental considerations.
6. The Company shall recognize and respect the rights of people who may be owners of traditional knowledge, and other forms of intellectual property.
7. The Company should increasingly take responsibility for the safe collection, reuse and recycling of their products at life so as to build a circular economy as a part of the notion of extended producer responsibility that is increasingly becoming part of regulation in India and globally.

COMPANY'S OTHER POLICIES/SOPS SUPPLEMENTING THIS PRINCIPLE:

Supplier code of conduct, Environmental Sustainability Policy, Environment Health & Safety Policy Capacity and Capability Building Policy, General Terms and Conditions - Service Providers, General Terms and Conditions - Consultants, General Terms and Conditions - Suppliers.

PRINCIPLE 3: EMPLOYEE WELLBEING

The Company strives hard to ensure that every employee enjoys stronger engagement, high morale, and better service. The Company and employees work diligently towards meeting individual and organizational goals. By providing regular training, giving awards, and recognizing the employee contribution, The Company builds employee's esteem and create workplace loyalty and build a sense of community. The Company is known for employing progressive HR practices that focus on talent acquisition, engagement, and retention through employee ownership, performance incentive, and reward programs.

POLICY

1. The Company should ensure that the business complies with all regulatory requirements pertaining to its employees, and that there are systems and processes in place to enable this to be done by its value chain partners.
2. The Company shall respect the right to freedom of association, participation, collective bargaining of all employees including contract and casual labour, and provide access to appropriate grievance redressal mechanisms.
3. The Company shall provide and maintain equal opportunities at the time of recruitment as well as during the course of employment irrespective of caste, creed, gender, race, religion, disability or sexual orientation.
4. The Company shall not use child labour, forced labour or any form of involuntary labour, paid or unpaid.
5. The Company should put systems and processes in place to support the work-life balance of its employees, especially that of women.
6. The Company shall provide facilities for the wellbeing of its employees including those with special needs.
7. The Company should ensure fair, timely and transparent payment of statutory wages of all its employees, including contract and casual labour without discrimination. They should ensure timely payment of fair living wages to meet basic needs and economic security of the employees.
8. The Company shall provide a workplace environment that is safe, hygienic, humane, and which upholds the dignity of the employees. Business should communicate this provision to their employees and train them on a regular basis.
9. The Company shall ensure continuous skill and competence upgrading of all employees by providing access to necessary learning opportunities, on an equal and non-discriminatory basis. They should promote employee morale and career development through enlightened human resource interventions.
10. Company shall create systems and practices to ensure a violence/harassment free workplace where employees feel safe and secure, with adequate provisions for grievance redressal.
11. The Company will also promote the well-being of employees and their value chains.

COMPANY'S OTHER POLICIES/SOPS SUPPLEMENTING THIS PRINCIPLE:

Vigil Mechanism & Whistle Blower Policy, HR Policies and Schemes: Diversity, Equity and Inclusion Policy, Capacity and Capability Building Policy, Employee Code of Conduct, Environment Health & Safety Policy, Equal Opportunity & Fair Treatment Policy, Grievance Handling Policy, Human Rights Policy, Prevention of Sexual Harassment, Panchsabha initiatives, KAAN, MUSKAAN.

PRINCIPLE 4: STAKEHOLDERS INTERESTS:

The Company gives utmost importance to the healthy engagement with its various stakeholders like employees, suppliers, dealers, customers, shareholders / investors, communities surrounding the operations and government / regulatory authorities. The Company continues its engagement with them through various mechanisms such as supplier/vendor meets, customer/ employee satisfaction surveys, investor forums, consultations with local communities etc.

The Company ensures that the interests of all stakeholders, especially those who may be vulnerable and marginalized, are protected. Further, the Company recognizes its responsibility to maximize the positive impacts and mitigate the adverse impacts of its products, operations, and practices on all its stakeholders.

POLICY

1. The Company shall systematically identify their stakeholders, understand their concerns, define purpose and scope of engagement, and commit to engaging with them.
2. The Company shall acknowledge, assume responsibility and be transparent about the impact of their policies, decisions, product & services and associated operations on the stakeholders and the natural environment.
3. The Company shall give special attention to stakeholders in areas that are underdeveloped.
4. The Company shall resolve differences with stakeholders in a just, fair and equitable manner.
5. The Company should develop systems, processes and mechanisms to identify its stakeholders, understand their expectations and concerns, define the purpose and scope of the engagement, consult with them in developing policies and processes that impact them, and commit to resolving any differences and redressing grievances in a just, fair and constructive manner.
6. The Company should enable all stakeholders to benefit fairly from the value generated by the businesses, and any conflicts or differences arising from the impact of business operations or the sharing of the value generated by the businesses should be resolved in a just, fair and equitable manner.

COMPANY'S OTHER POLICIES/SOPS SUPPLEMENTING THIS PRINCIPLE:

CSR Policy, Vigil Mechanism & Whistle Blower Policy, Dividend Distribution Policy, HR Policies and Schemes, Shareholders Communication/services.

PRINCIPLE 5: HUMAN RIGHTS:

The Company seeks to conduct business in a manner that respects each and every individual associated with the Company. In this regard, Company endeavor to respect and promote human and encourages a workplace environment which is free from any kind of human rights violations.

POLICY

1. The Company shall understand and make its employees aware of the human rights content of the Constitution of India, national laws and policies and the content of International Bill of Human Rights and their application to businesses as outlined in the United Nations Guiding Principles for Business and Human Rights. It should further ensure that the responsibility for addressing such impacts is assigned to the appropriate level and function within the business.
2. The Company should appreciate that human rights are inherent, universal, indivisible and interdependent in nature.
3. The Company should ensure that the business has in place such policies, structures and procedures that demonstrate respect for the human rights of all stakeholders impacted by its business. This includes carrying out human rights due diligence to identify, prevent, mitigate and account for how they address adverse human rights impacts.
4. The Company should ensure that their business, where it is causing, contributing or otherwise linked to adverse human rights impacts, takes corrective actions to address such impacts.

5. The Company shall integrate respect for human rights in management systems, in particular through assessing and managing human rights impacts of operations, and ensuring all individuals impacted by the business have access to grievance mechanisms.
6. The Company shall recognize and respect the human rights of all relevant stakeholders and groups within and beyond the workplace, including that of communities, consumers and vulnerable and marginalized groups.
7. The Company shall, within their sphere of influence, promote the awareness and realization of human rights across their value chain.
8. The Company shall not be complicit with human rights abuses by a third party.
9. The Company should ensure that all individuals and groups whose human rights are impacted by them have access to effective grievance redressal mechanisms.

COMPANY'S OTHER POLICIES/SOPS SUPPLEMENTING THIS PRINCIPLE:

Human Right Policy, Vigil Mechanism & Whistle Blower Policy, HR Policies and Schemes: Diversity, Equity and Inclusion Policy, Capacity and Capability Building Policy, Employee Code of Conduct, Environment Health & Safety Policy, Equal Opportunity & Fair Treatment Policy, Grievance Handling Policy, Prevention of Sexual Harassment, Panchsabha initiatives, KAAAN, MUSKAAN.

PRINCIPLE 6: ENVIRONMENT PROTECTION AND RESTORATION

The Company values its natural surrounds and is committed towards protection and preservation of environment and natural resources. The Company will take concerted efforts towards exploring recycling options, waste management, energy efficiency and conservation to minimize the overall environmental impact. The Company endeavors to protect and make efforts to restore the environment.

POLICY

1. The Company should ensure that the business formulates appropriate policies, procedures and structures to assess, measure and address its adverse impacts on the environment at all its locations, at all stages of its life cycle from establishment to closure. Special care should be taken where these impacts occur in eco-sensitive areas.
2. The Company shall utilize natural and manmade resources in an optimal and responsible manner and should develop appropriate strategies for sustainable and efficient use of natural resources and manufactured materials, giving due consideration to expectations and concerns of all stakeholders.
3. The Company shall take measures to check and prevent pollution. They should assess the environmental damage and bear the cost of pollution abatement with due regard to public interest.
4. The Company shall ensure that benefits arising out of access and commercialization of biological and other natural resources and associated traditional knowledge are shared equitably.
5. The Company should define measurable key performance indicators and targets to monitor their performance on environmental aspects such as water, air, land-use, forest, energy, materials, waste, biodiversity, built environment and so on.
6. The Company should focus on addressing climate change through development of both mitigation and adaptation measures, and build climate resilience and in line with India's Nationally Determined Contributions to the Paris Climate Change Agreement and the National/State Action Plans on Climate Change.
7. The Company should learn from industry best practices for promoting reduction, reuse, recycling and recovery of material and resources, and encourage and motivate its stakeholders, particularly consumers and business partners, to do the same.

8. The Company shall continuously seek to improve their environmental performance by adopting innovative, resource-efficient and low-carbon technologies, cleaner production methods, promoting use of energy efficient and environment friendly technologies and use of renewable energy and such other solutions resulting in lower resource footprint, lesser material consumption and more positive impact on environment, economy and society.
9. The Company shall develop Environment Management Systems (EMS) and contingency plans and processes that help them in preventing, mitigating and controlling environmental damages and disasters, which may be caused due to their operations or that of a member of its value chain.
10. The Company shall report their environmental performance, including the assessment of potential environmental risks associated with their operations, to the stakeholders in a fair and transparent manner.
11. The Company shall proactively persuade and support its value chain to adopt this principle.

COMPANY'S OTHER POLICIES/SOPS SUPPLEMENTING THIS PRINCIPLE:

Climate Change and Biodiversity Policy, Environment Health & Safety Policy & Environmental Sustainability Policy.

PRINCIPLE 7: COMPANY ADVOCACY

The Company endeavors to cooperate with trade association in support of legitimate trade practices, to work with Government bodies for the betterment of public polices and support issues such as fair and transparent business practices, inclusive growth, social responsibility and environmental stewardship.

POLICY

1. The Company shall co-operate with all Government bodies and policy makers towards implementation of laws and regulations.
2. Wherever need be, the Company shall provide constructive feedback and views towards polices keeping in mind the larger public interest.
3. The Company shall co-operate with our trade associations in support of legitimate trade practices.
4. The Company should ensure that its advocacy positions are consistent with the Principles contained in these Guidelines and publicly disclosed.
5. The Company should, to the extent possible, undertake policy advocacy through trade and industry chambers and associations, and other similar collective platforms.
6. The Company should ensure that its policy advocacy positions promote fair competition and respect for human rights.

COMPANY'S OTHER POLICIES/SOPS SUPPLEMENTING THIS PRINCIPLE:

Anti-Corruption and Anti-Bribery, Supplier code of conduct, Environmental Sustainability Policy, Environment Health & Safety Policy Capacity and Capability Building Policy, General Terms and Conditions - Service Providers, General Terms and Conditions - Consultants, General Terms and Conditions - Suppliers.

PRINCIPLE 8: INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

Corporate Social Responsibility is intrinsic to the core values of the Company and it believes in corporate excellence and social welfare. This corporate philosophy is force for integrating CSR in values, culture, operational and business decisions at all levels of the Company. Trident has a value system of giving back to the society and improving life of the people and surrounding environment.

POLICY

1. The Company shall understand their impact on social, cultural and economic development of society, and respond through appropriate action to minimise the negative impacts on society including arising from land acquisition and use, construction of facilities and operations.
2. The Company should assess, measure and understand their impact on social, and economic development, and respond through appropriate action to minimize and mitigate its negative impacts on society.
3. The Company shall innovate and invest in products, technologies and processes that promote the wellbeing of all segments of society, including vulnerable and marginalized groups.
4. The Company shall make efforts to complement and support the development priorities at local and national levels, and to minimize the negative impacts of displacement of people and disruption of livelihoods through their business operations and where displacement is unavoidable, this process must be undertaken in a humane, participative, informed and transparent manner, where just and fair compensation is paid to those impacted.
5. The Company should respond to national and local development priorities and understand the needs and concerns of local communities, particularly vulnerable and marginalised groups and in regions that are underdeveloped, while designing and implementing their CSR programmes.
6. The Company operating in regions that are underdeveloped should be especially sensitive to local concerns.
7. The Company should respect all forms of intellectual property and traditional knowledge and make efforts to ensure that benefits derived from their knowledge are shared equitably.

COMPANY'S OTHER POLICIES/SOPS SUPPLEMENTING THIS PRINCIPLE:

Corporate Social Responsibility (CSR) Policy, Human Right Policy, Vigil Mechanism & Whistle Blower Policy, HR Policies and Schemes: Diversity, Equity and Inclusion Policy, Capacity and Capability Building Policy, Employee Code of Conduct, Environment Health & Safety Policy, Equal Opportunity & Fair Treatment Policy, Grievance Handling Policy, Prevention of Sexual Harassment, Panchsabha initiatives, KAN, MUSKAN.

PRINCIPLE 9: CUSTOMERS VALUE

The Company strives to deliver a strong value proposition to our customers through low cost, high-quality products. Driven by our deep understanding of customer markets in developed countries and the Company's significant presence in the international market, our focus on quality and brand identity has resulted in a network of loyal clientele worldwide. Company's alliance with major online retailers enables the Company to meet the evolving demands of today's tech savvy customer.

POLICY

1. The Company should ensure that the business minimizes and mitigates any adverse impact of its goods and services on consumers, the natural environment and society at large.
2. The Company, while serving the needs of their customers, shall take into account the overall well-being of the customers and that of society.
3. The Company shall ensure that they do not restrict the freedom of choice and free competition in any manner while designing, promoting and selling their products.
4. The Company shall disclose all information truthfully, accurately, and factually, through labelling and other means, including the risks to the individual, to society and to the planet from the use of the products, so that the customers can exercise their freedom to consume in a responsible manner. Where required, Company shall also educate their customers on the safe and responsible usage of their products and services.
5. The Company should manage consumer data in a way that does not infringe upon their right to privacy.
6. The Company should make consumers aware of, and provide information and guidance to them on, safe and responsible usage and disposal of their products (including reuse and recycling), and to eliminate over-consumption.

7. The Company shall promote and advertise their products in ways that do not mislead or confuse the consumers or violate any of the given principles of this Policy.
8. The Company shall exercise due care and caution while providing goods and services that result in over exploitation of natural resources or lead to excessive conspicuous consumption.
9. The Company shall provide adequate grievance handling mechanisms to address customer concerns and feedback.
10. In case, the Company provides any essential service, e.g. utilities, should enable universal access, including to those whose services have been discontinued for any reason, in a non-discriminatory and responsible manner.

COMPANY'S OTHER POLICIES/ SOPS SUPPLEMENTING THIS PRINCIPLE:

Grievance Handling Policy, Supplier code of conduct, Code of Business Conduct and Ethics, Customer Surveys/ Feedbacks.

LIMITATION AND AMENDMENT:

In the event of any conflict between the provisions of this Policy and the LODR Regulations or the Act, rules or any other statutory enactments, the provisions of LODR Regulations or the Act, rules or statutory enactments, shall prevail over this Policy. Any subsequent amendment / modification in the LODR Regulations, Act, rules and/or applicable laws in this regard shall automatically apply to this Policy.