

2024



Together with Trident

Supplier code of conduct

TRIDENT LIMITED

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Trident Limited is the flagship Company of Trident Group, an Indian business conglomerate and a global player. Trident is one of the largest players in home textile in India. Supplying national, captive, and retailer owned brands, the organization is highly decorated with awards from its customers, vendors, and various government entities in recognition of advancing the highest standards in product quality, social responsibility, and environmental stewardship. The Company operates in four major business segments: Yarn, Towel, Bedsheets and Paper & Chemicals with its manufacturing facilities located in Punjab and Madhya Pradesh.

A message from the Chairman Emeritus

The Trident Group today, is a USD 1 billion plus global conglomerate with a formidable presence in home textiles, paper, and chemicals. Behind these accomplishments lie innumerable stories of our people, who have made Trident a force to reckon with. We are because of the passion of thousands of members employed with us, our dynamic business partners and billions of happy customers across the globe.

As the world tackles substantial and continuing social, environmental, and economic challenges, the actions we take to transform our business are vital than ever. We recognise the interrelation between people and the planet, building strong linkages between environmental strategies and social impacts. We believe investments in ESG provide any organization with long-term business opportunities. By establishing strategic partnerships with key stakeholders such as yourself and growing in various advanced ways such as circular business models, we can expand our business in a way that dissociates our fiscal growth from the use of limited natural capitals.

We will continue to make investments in newer business models, resources and technologies that have the potential to drive major shifts in how we manufacture our products. Our endeavour to positively impact the people associated with our value chain including our supplier partners are equally as important as the steps we take to reduce our environmental footprint. We intend to work with you to improve social dialogue, understand the environmental impact you may have and provide you insights on best practices where required.



Combined with these efforts, we will keep working towards increased transparency to empower stakeholders to make more informed decisions about the company.

I welcome open conversation and collaboration on the road ahead to mitigate the shared challenges of our industry.

Here's to a partnership full of *Opportunities Unlimited!*

Regards,

Rajinder Gupta
Chairman Emeritus

A note from the Group Head Supply Chain

Trident has embarked on a journey to make the company one of the most trusted brands, we are also focusing on Environmental, Social and Governance (ESG) aspects in a more structured manner.

To realise our objectives and ensure ethical conduct, it is important that our supplier partners such as yourself share our values and vision; and enhance the sustainability standards in our supply chain. We acknowledge that long-term sustainable development of our supplier partners is critical to our combined success, and we value our association with partners who share the same approach and vision. In line with our commitment, we have developed this guiding document for our supplier partners – *Together with Trident – Supplier code of conduct*. This is in line with our belief of “*togetherness*”- *people matter*, we strongly believe in building and strengthening trust with each other. The principles and direction in this guide are an addition to our values and extends to all our supplier partners.

We hold our partners to the same high standards we set for our employees. We expect our business to operate in accordance with the principles as outlined in this code of conduct and adhere to all applicable laws and regulations. This code of conduct details our expectations with regards to ethics, business integrity, human rights, health and safety, environment, the local community and quality of product and operations. This code of conduct goes beyond mere compliance with the applicable laws by drawing upon internationally recognised standards to identify and define best practices from across the globe.

We will periodically review this code of conduct to ensure that it continues to remain relevant and help us move towards our vision. We encourage our partners to review this information and ensure that the principles outlined in this are reflected in on-going business dealings with Trident. We sincerely hope that you will embrace the spirit in which this code of conduct has been developed.

Regards,

Kavish Dhanda
Group Head – Supply Chain

Sustainable procurement at Trident

Sustainable procurement at Trident is built on four fundamental principles – environment protection, social responsibility, business ethics and quality.



Applicability of the code of conduct

This code of conduct applies to all the supplier partners of Trident, covering but not limited to following categories–

1. Raw materials
2. Packaging
3. Store & Spares, OEMs
4. Dyes & Chemicals
5. Logistics
6. Service providers
7. Commission agents

This supplier code of conduct will be made available to our supplier partners along with the purchase order/ agreement.

A signed supplier agreement, acceptance of a purchase order constitutes acceptance of the directions stipulated in this guide and serves as the supplier partner's continuing confirmation of compliance. Additionally, Trident may enter into contracts with certain other parties that require those parties to comply with this guide. In this document, we refer to anyone covered by this guide as a "business partner."

Our supplier partners include some of the largest and well-known companies as well as MSMEs (Micro, Small and Medium Enterprises) and SMEs (Small and Medium Enterprises). They span the wide range of products and services we procure.

The supplier partners are responsible for compliance with this guide throughout their business and throughout the process of providing products and services to Trident. Anyone who violates the guide may be subject to consequences, up to and including termination of business with Trident. Trident reserves the right to audit or inspect the supplier partners periodically to determine their compliance with this guide.

1. Environment Protection

Environmental concerns are the real challenges that needs to be addressed today. We aim at making our value chain environmentally friendly and responsible. We expect our supplier partners to comply with the requirements of local laws and regulations related to environment in the countries and regions where they operate and source any material, product or services from.

We realise that the scope and nature of operations of our partners may vary and hence emphasis on these principles may vary accordingly.

1.1 Resource management

- a. We recommend our supplier partners to procure virgin **agri-based** raw materials from the produce using regenerative agricultural practices, where possible.
- b. We recommend our supplier partners to assess their use of **hazardous and toxic material** and take necessary steps to reduce it, as much as possible.
- c. **Chemicals** should be managed in line with product Restricted Substances List (RSL) and Manufacturing Restricted Substances List (MRSL) requirements.
- d. We recommend that our supplier partners recognize sources of **emissions** (CO₂, Other Greenhouse Gases, SO_x, NO_x and Particulate Matter) and make gradual efforts towards reducing these emissions.
- e. We recommend our supplier partners to use **renewable** sources of energy wherever possible to become more energy efficient and independent.
- f. Opportunities for reduction in **water** usage should be identified and measures for water conservation should be employed.
- g. We recommend our supplier partners to handle **waste** as per local statutory guidance and implement mechanisms to dispose-off the waste to authorised waste processors/ recyclers.
- h. Our supplier partners should endeavour towards enhancing the **efficiency** and performance of the equipment and processes by continual improvement, monitoring and assessment of **existing/ upcoming technology**.
- i. We recommend our supplier partners to avoid **deforestation** in their operations. They shall focus on biodiversity conservation in and around the project sites with emphasis on biodiversity hotspots and protected areas, where applicable.

1.2 Adopting Green Initiatives and Practices

To monitor the environmental performance and to become environment friendly, practices to monitor and minimise environmental impact should be embedded in organisation's processes. We recommend that our supplier partners adopt such practices in their operations to reduce their overall impact on the environment.

Adopting standards such as ISO 14001 on environmental management system, ISO 50001 on energy management system, etc.

1.3 3Rs- Reduce, Reuse and Recycle

- a. We recommend our supplier partners to **responsibly consume** resources, including virgin raw material, in their processes. The supplier partners should look for opportunities to reduce natural resource dependency by improving efficiency, investing in advanced technology, reusing material by innovating products and processes.
- b. Waste to **landfill** should be analysed and supplier partners must try and establish targets to reduce the quantity of disposal to landfills. Alternate waste disposal techniques should be adopted.
- c. Supplier partners must try and take steps to reduce the environmental impact of their **packaging material** by developing innovative, practical solutions to modify the design and disposal method to the best possible extent.

2. Social Responsibility

We are dedicated towards supporting sustainable development. Sustainable practices now encompass social performance criteria as well. We believe that as an organisation we play a significant and beneficial role within the local community and society in general. We are contributing towards social and economic development of the communities where we operate and expect a similar approach from our supplier partners.

2.1 Responsible Conduct

- a. We recommend our supplier partners to take initiatives to have a **diverse and inclusive** workforce in terms of age, gender, experience, ethnicity etc.
- b. We encourage our supplier partners to conduct all transactions with their partners in **fair and transparent** manner including fair evaluation, selection, equal opportunities, and competition for all.
- c. We encourage our supplier partners to address issues and concerns of the **community** impacted by their operations and minimise the impact.

2.2 Employee Health & Safety and Well-being

We expect our supplier partners to adopt robust and relevant management practices to comply with applicable health and safety laws, rules, regulations, and industry standards. The supplier partners are also encouraged to conduct training and awareness activities for employees on health & safety and well-being.

We also recommend our supplier partners to take reasonable steps to prevent accidents and injuries by analysing and minimising risk exposure.

2.3 Local Community Development

We understand that our operations not only affect our own communities but also of those who are in contact of our supplier partners.

We encourage our supplier partners to undertake steps to collaborate and associate with the local community for economic and social development by providing employment opportunities, thereby helping in eradicating poverty, helping in developing skills of local people etc. wherever relevant.

3. Business Ethics

We conduct our business activities in a fair and transparent manner with integrity, high ethical & moral standards, and respect for human rights. We strongly believe that high ethical standards are critical for sound business relationships. We expect our supplier partners to share this commitment in their operations.

3.1 Business Integrity and Ethics

- a. Supplier partners in all commercial dealings with Trident or otherwise must not receive or offer to make any **illegal payments, gifts, bribes, donations** or **other improper advantage** in order to obtain unethical favours.
- b. All supplier partners must ensure that no action is taken to violate any applicable **anti-bribery or anti-corruption laws** and regulations in the region of their operations and make every effort to eliminate all forms of corruption and bribery.
- c. Supplier partners are recommended to report any **conflict of interest** in any business dealings with Trident that they are aware of to allow us the opportunity to take appropriate and necessary action. It should be disclosed if any Trident employee or professional under contract with Trident may have any significant ownership or interest in any supplier partners' operations.
- d. Supplier partners must comply with applicable local and international laws to **promote free and fair competition** and to get business by offering **competitive prices** and innovative products.
- e. All supplier partners shall protect and respect Trident's intellectual property; trade secrets and other confidential, proprietary and sensitive information or data at all times and shall not disclose the same. The information provided by Trident should be used only for its intended and designated purpose as decided and agreed upon between Trident and the business partner.

3.2 Human Rights

- a. Supplier partners shall prohibit use of **child labour** at any stage of their business process. We expect that our partners will not employ any person below the age of 15 (or as per local law, whichever is greater). The supplier partners must not deploy **forced labour** including prison or debt bondage labour, human trafficking or modern-day slavery.
- b. Supplier partners must ensure there is no **discrimination** in their hiring and employment practices based on race, colour, gender, age, nationality, religion, sexual orientation, marital status, citizenship, disability, veteran status, medical condition etc.
- c. We expect our supplier partners to comply with applicable **wage and hour laws**, regulations and mandatory industry standards pertaining to minimum wages, overtime pay, working hours and rest periods.
- d. Supplier partners shall recognize and respect the right of their employees to exercise lawful **rights of free association and collective bargaining**. Workers shall be free to establish and join organizations of their choice. Workers shall not be subjected to blacklisting, intimidation or retaliation in the exercise of their right to join or to refrain from joining any organization unless it is restricted under law.

3.3 Legal and Regulatory Compliance

We expect our supplier partners to comply with all applicable laws and regulations within the country of operation. All other applicable international laws and regulations should also be complied with. Supplier partners should follow guidelines of all the required permits and registrations to be always legally compliant.

4. Quality

Ensuring quality and adherence to manufacturing and product standard is critical to us.

4.1 Quality Management System

We expect our supplier partners to establish quality objectives, policies, manual, procedures and have in place a certified Quality Management System by competent authority like ISO. The partners should comply with local regulations, registrations, have trainings, management reviews and internal audits to ensure that the Quality Management System is effective.

We expect our supplier partners to give utmost importance to equipment design, maintenance and ensure validation/verification of the same. The partners should have in place appropriate housekeeping to ensure hygiene, safety and security of its workforce.

We expect our supplier partners to have in place established manufacturing and packaging operations with apt maintenance of records along with process controls.

4.2 Material Management

We expect our supplier partners to have in place established practices for storage, handling, and transportation of raw material and to maximise good warehousing practices and proper handling of rejected item.

4.3 Accountability and Transparency

We expect our supplier partners to prepare and maintain accounts of business dealings fairly, accurately and in accordance with accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country of operation.

Implementation of the code of conduct

Applicability and Implementation

We understand that our supplier partners fall under different categories in terms of their scale, the product/service they supply, the raw materials being used by them, their organisation structures, and geographies of operation. Being mindful of these factors, we have designed this code of conduct in a manner that it works for the whole partner base. We expect our supplier partners to set in place internal policies, governance structures, systems, processes and take any other relevant measures to ensure adherence with this code of conduct.

The partners are expected to disclose to us the goals set by them, and the measures undertaken for each of the various principles underlined in this code of conduct. We will work with our partners to identify issues that do not meet our expectations and help them in addressing the gaps identified, if any.

Monitoring

We expect our supplier partners to monitor and report the initiatives undertaken by them with regards to ensuring adherence to this guide. We recommend our partners to place monitoring and reporting mechanisms and management systems, wherever required to effectively implement and manage such initiatives. The supplier partners should focus on continuously improving their performance with regards to compliance with this code of conduct.

Reporting to Trident

We ensure we live up to our high standards and progress in a manner consistent with our values. At times we ask our supplier partners for assistance, and we solicit your cooperation.

- a. Work together with Trident team during investigations related to **potential violations of law**, regulation, policy, contract, or this guide. The supplier partners are recommended to respond to inquiries and requests for information.
- b. The supplier partners are recommended to make their products, facilities, and records available for **audits, inspections, and tests**.
- c. The supplier partners are recommended to maintain **accurate records**. These include financial, production, records of dealings with government officials relating to the business with Trident, and records of goods supplied to Trident. The records must be sufficient to demonstrate the compliance with this guide and all other expectations set forth by Trident through contracts.

Reporting on Breaches

We support and encourage those who report actual or suspected breaches without any fear of retaliation. Any failure to comply with this code of conduct (including any failure by a team member of Trident or anyone acting on behalf of Trident to so comply), of which the business partner is aware, should be immediately reported through our anonymous whistle-blower process. The failure to do so will be a breach of this code of conduct.