

<b>Guideline / Policy</b>	<b>Title</b>	Anti-Corruption and Anti-Bribery
	<b>Version</b>	V5
	<b>Issue Date</b>	16/04/2014
	<b>Revision Date</b>	26/07/2024

### Document History

Version	Date of Amendment	Author	Brief Description of Change	ReviewedBy
1	16/04/2014	SHR	Inclusion of Scope in the policy	Legal & Compliance
2	05/07/2021	SHR	Change in policy format and inclusion of definition.	Legal & Compliance
3	16/09/2022	SHR	Review of Policy	Chief of IR
4	26/02/2024	SHR	Annual Revision & Addition of Employer and Members Rights & Duties	Process Owners & Knowledge Partners
5	26/07/2024	SHR	Review of Policy	Process Owner

### I. Introduction

We at Trident Limited are committed to conducting all our business activities in adherence to our values which comprise of highest standards in the conduct of business. It is our policy to conduct all our businesses in accordance with the highest standards of professional integrity, honesty, and ethical conduct. In this regard, we have implemented and enforced effective systems to counter bribery, corruption, and unfair trade practices. This Anti-Corruption and Anti-Bribery policy of Trident emphasizes on Trident's Zero-tolerance approach towards corruption and bribery.

Trident Limited is committed to adhering to all relevant laws, regulations, and orders issued by the appropriate governmental authorities. This includes prohibitions against providing financial or other benefits for corrupt purposes or in connection with the improper performance of a relevant function.

Our compliance extends to, but is not limited to, the Indian Prevention of Corruption Act 1988. We also abide by other applicable laws that govern corruption and bribery, whether it involves public officials, commercial entities, or both.

In addition, we adhere to laws such as the Indian Penal Code, 1860, which also governs these areas. Our policy is to uphold the highest standards of ethical conduct and to act with integrity in all our dealings.

In every instance throughout this policy, the terms "This Company," "The Company," "Company," and "Trident" signify "Trident Limited".

Member shall include any person on payroll of Trident Limited, including those working within the premises of the Company whether directly or indirectly (through contractor or outsourcing agencies)

## II. Scope

Under this policy, every individual working at all levels and cadres (whether permanent, fixed-term, temporary and contractual), directors, retainers, consultants, contractors, subcontractors, subcontractor's representative deployed in Trident premises, trainees, casual workers, or those associated with us or any of our subsidiaries/associates in any other capacity (hereinafter collectively referred to as 'member'). This policy will also be applicable to our suppliers for/from whom we are procuring raw materials and packing materials. This policy will also be applicable to all our sub-contractors as well as their staff working with us.

## III. Key Definitions

- **Bribery:**

Shall be defined as any form of gift such as cash, jewelry, household items, donations, company products, gift vouchers, free accommodation, free dinner/lunch outside company premises, favours for employment etc. Any Member who, —

- Obtains or accepts or attempts to obtain from any person, an undue advantage, with the intention to perform or cause performance of official duty improperly or dishonestly or to forbear or cause forbearance to perform such duty either by himself or by another Member; or
- Obtains or accepts or attempts to obtain, an undue advantage from any person/client/supplier/vendor as a reward for the improper or dishonest performance of towards official duty or for forbearing to perform such duty either by himself or another Member; or
- Performs or induces another Member to perform improperly or dishonestly an official duty or to forbear performance of such duty in anticipation of or in consequence of accepting an undue advantage from any person /client/supplier/vendor etc.

- **Government officials:**

**We define government officials as:**

- Elected or appointed official, member (full-time or part-time) or person acting on behalf of or representative of any government or government-owned or government-controlled business enterprise;
- Officer or member or person acting in an official capacity for or on behalf of a public international organization (like United Nations, World Bank, or International Monetary Fund etc).
- An elected official of a political party; or a candidate for political office;
- Any other person who is a public official according to applicable laws regulations and industry codes;
- The definition of a government official extends to its spouses and family members.

- **Corruption:** Corruption shall mean and include wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards.

- **Kickback and facilitation payments:** Kickbacks are typically payments made in return for a business favor or advantage. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by an official.

## **IV. Policy**

### **Anti-Corruption**

Trident prohibits bribery of any form or type as applicable under, the Indian Prevention of Corruption Act 1988, and other applicable laws which involve government officials, clients, customers, competitors, suppliers, and all other counterparties directly or indirectly associated with any type of the work of the company is strictly prohibited.

The policy extends to all commercial dealings where Trident operates. Compliance with the policy is mandatory by all members and parties involved in a business transaction, failing which might result in strict disciplinary action including termination of employment with Trident.

All members are required to provide a signed declaration adhering to the provisions of Anti bribery and anti-corruption policy.

The purpose of this policy is to:

- Set out our responsibilities to comply with laws against bribery and corruption; and
- Provide guidance on how to recognise and deal with bribery and corruption issues.
- The guidelines in this policy should be read in conjunction with the corporate code of conduct, whistleblower policy and other relevant policies as may be implemented from time to time.

Any bribery and corruption incidence shall be kept strictly confidential.

### **Mergers and Acquisitions**

Trident shall undertake appropriate and reasonable due diligence on the reputation and integrity of any business in which we make investments. In case of mergers and acquisitions, due diligence is required on the target company to assess the risk of corruption.

### **Prohibited Payments**

No Trident member will be directly or indirectly involved in a bribe or kickback to any person which could constitute payment of any value which represents free service or benefits of any kind.

### **Facilitation Payments**

No Trident member will be involved in any transactions or payments to a government official for the purpose of expediting or securing performance of a non-discretionary routine action, such as obtaining permit or licenses, passport or visas, official documents, processing governmental papers, or providing police or utility services.

### **Third Parties**

Misconduct by third parties which can be construed as non-compliance to this policy is strictly prohibited. Appropriate care must be taken when selecting and monitoring the activities of the Third-Party Representatives. Trident's interaction with the Third-Party Representative must be evaluated and monitored.

Due diligence is required to conduct business to the highest ethical standards.

### **Donations**

The Company may make donations but only if they are ethical and in compliance with this policy, and local applicable laws. No donation should be made which may or may be perceived to breach applicable law or any other section of this policy. All donations shall be approved by the Managing Director and Trident shall keep accurate records of all donations.

## **Zero Tolerance**

We have a zero-tolerance approach towards bribery, corruption, or any such unfair trade practices. Under this policy, any Member will not indulge, at any time, and on any occasion, in malpractice of receiving or offering a bribe which might be of monetary nature or in form of any promise to do or omit to do any act or promise to perform any services for anybody in any form, inside or outside the premises of the Company.

## **No Gift Policy**

We define gifts and gratuities to include tickets to entertainment events, kickbacks in the form of money or merchandise, special discounts to one of our members, discontinued or no-longer used samples, vendor paid trips, Christmas/Diwali/Festival gifts, etc. Meals are also considered a gratuity.

We define gifts and gratuities which inter alia include:

- Hospitality such as free hotel rooms
  - Any cash, loans, or cash equivalent like sponsored trips, movie tickets, kickbacks, special discounts, discontinued or no longer used samples, vendor-paid trips etc.
  - Any sort of personal advantage like employment or business opportunity for the family, relatives, or friends in your companies/firms.
  - Any personal services or favours (except small advertising items with no commercial value, business courtesies or simple business meals)
  - Regulations: Applicable norms as may be enacted by the Parliament of India or the State Government, as applicable to the Company from time to time
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- We firmly believe that gifting of any sort is against our code of conduct requires that all members demonstrate our organization's commitment to treating all people and organizations, with whom we come into contact or conduct business, impartially.
  - The members of our Company, regardless of their capacity, should not accept for their personal benefits, gratuities, tips, cash, samples etc. from anyone buying from us, selling us, or availing any service from Trident. When dining together, the Business Associate and Trident member(s) must pay for their own meals.
  - Gifts on special occasions only (Diwali and other festivals) can be accepted up until a threshold of INR 1000 (Examples include and are not limited to sweet Boxes, mini hampers, etc). Gifts valuing more than INR 1000 must not be accepted.
  - Gifts should not be accepted even from sub-contractors and other third parties on a plant level.
  - If any Member is found indulged in any such kind of activity (ies), such Member will be liable for strictest disciplinary action as per Company's Standing Order /Service Rules/Policies, including dismissal/termination of services/ contractual or business relationship, as the case may be.
  - The Member shall be personally liable for all legal consequences for any activity conducted in deviation to this Policy thereof and the Company shall not indemnify the Member in any manner whatsoever.
  - All the members are free to report these kinds of incidents to Human Resource department or any authorized officer on this behalf All such reports will be kept highly confidential. No action will be taken against the member reporting the incident.

## V. Procedure

### **Disciplinary Action**

- If any Member is found indulging in any kind of activity(ies) involving corruption or bribery, such members will be liable for the strictest disciplinary action as per Company's Standing Order /Service Rules/Policies, including warning, penalty, suspension, dismissal/termination of services/ contractual or business relationship, legal action as the case may be.
- If any Member is found indulged in any kind of activity(ies) involving corruption or bribery, such members will be liable for the strictest disciplinary action as per Company's Standing Order /Service Rules/Policies, including warning, penalty, suspension, dismissal/termination of services/ contractual or business relationship, legal action as the case may be. The Member shall be personally liable for all legal consequences for any activity conducted in deviation to this Policy thereof and the Company shall not indemnify the Member in any manner whatsoever.
- If anybody becomes the victim of bribery, in that case he /she should directly contact the Director Corporate Affairs of the company and should inform the incidence in person so that proper action can be taken against the culprit. No excuse will be entertained in this regard.
- In case any such incident has been reported, the same should appear in the record and shall be published physically & digitally.
- The company will give full protection to the person/ member whosoever informs such incidence and feels fear of being harassed at any time.

### **Protection:**

Associates who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption or because of reporting concerns under this policy in good faith. If any member has suffered any detrimental treatment, they should inform their reporting manager or human resource team on an immediate basis.

### **Appeal:**

- If either party expresses dissatisfaction with the outcome of the process, they have the right to appeal by submitting a written appeal within five working days of receiving the decision notice. The appeal should be addressed to the Chief of IR and must include a comprehensive explanation of the grounds for the appeal, along with any additional relevant information to be considered.
- If the appeal is deemed suitable for consideration, it will proceed to a formal hearing. The appeal hearing will be scheduled as expeditiously as possible, and the grounds for the appeal, including any supplementary information, will be shared with the concerned parties involved in the anti-bribery and corruption.
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- During the appeal hearing, the concerned person will attend, and they will be given the opportunity to present and elucidate their respective cases directly to the Chief of IR. A detailed summary of the appeal hearing will be prepared and shared with the attendees, who will be requested to verify its accuracy.
- The final decision resulting from the appeal hearing will be communicated in writing to the member within 15 working days from the date of the hearing.

It is essential to note that the Appeal stage constitutes the concluding phase of the internal grievance procedure, and any decision made at this juncture shall be considered binding within the organization. However, should any of the parties remain dissatisfied with the decision at the Appeal stage, they retain the option to escalate their complaint to the appropriate external body or authority for further consideration and resolution.

## **VI. Interpretation and Guidance**

In case any part of policy is not clear, members can approach their respective Business IR/ Chief of IR.

## **VII. Training and Audit**

Dissemination of this policy for new joiners shall be carried out at the time of induction. Compliance with the procedures in this Policy is mandatory and subject to audit.

To ensure that Trident has adequate procedures to combat anti-bribery and anti-corruption risks and threats, regular training courses are conducted for all business units and members.

Training will be conducted either online or in-person or a combination of both and will be administered by the Learning & Development Team . The training will be required to be completed within a specified timeframe. Members are expected to keep themselves up to date by undergoing repeat training on a half-yearly basis or whenever a training program is updated.

Details regarding training programs and capacity building are outlined in Trident’s independent policy titled “Capacity and Capability Policy” and this policy must be read in conjunction with the same.

## **VIII. Record-Keeping**

Trident members must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

Members must declare all hospitality and/or gifts accepted or offered, which will be subject to managerial review and ensure all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the company’s expenses policy and specifically record the reason for the expenditure.

All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers, and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

## **IX. Exception**

Any exception to the above policy shall be approved by the Chairman Office, Business Head, CHRO, Compliance Officer & Legal Head.



**X. Review Timeline**

The policy shall be reviewed annually or as and when the company may deem fit.

**XI. Governance**

**Responsibility Matrix**

1	Implementation/Execution	Finance Team & Legal Team
2	Monitoring	Corporate ESG
3	Auditing	Legal Head, Compliance Officer, CFO, CHRO
4	Ownership	Finance Team, Legal Team & HR Team

The Company will undertake a periodic bribery and corruption risk assessment across its business to understand the bribery and corruption risks it faces and will ensure that it has adequate procedures in place to address those risks.

**Employer Rights:**

- The employer reserves the right to take strict disciplinary action, including warning, penalty, suspension, dismissal, termination of services, or contractual/business relationship, against any member found engaged in activities involving corruption or bribery, as per the Company's Standing Order/Service Rules/Policies.
- The employer can undertake appropriate and reasonable due diligence on the reputation and integrity of any business in which it makes investments, especially in the case of mergers and acquisitions, to assess the risk of corruption.
- The employer has the right to prohibit any member, directly or indirectly, from being involved in a bribe or kickback to any person, including government officials, clients, customers, competitors, and suppliers, which could constitute payment of any value representing free service or benefits of any kind.
- The employer has the authority to implement a zero-tolerance approach towards bribery, corruption, or any unfair trade practices, and any member indulging in such malpractices may face strict disciplinary action, including termination of employment.
- The employer can refuse to accept or offer any form of bribe, and members, regardless of their capacity, are prohibited from accepting personal benefits, gratuities, tips, cash, or samples from anyone buying from, selling to, or availing any service from Trident.
- The employer reserves the right to define and regulate acceptable gifts and hospitality exchanges, emphasizing that such exchanges must be reasonable, proportionate, and comply with applicable laws.
- The employer has the authority to conduct regular training courses for all members on anti-bribery and anti-corruption procedures, and compliance with these procedures is mandatory and subject to audit.
- The employer can encourage openness among associates and will support anyone who raises genuine concerns in good faith under the policy, ensuring that no one suffers detrimental treatment for refusing to take part in corruption or reporting concerns.
- Trident employer has the right to keep all reports of bribery or corruption incidents strictly confidential, and no adverse action will be taken against the member reporting the incident.

- The employer reserves the right to maintain adequate record-keeping procedures, requiring members to keep financial records and have internal controls in place to evidence the business reason for making payments to third parties. Non-compliance with record-keeping standards may lead to disciplinary actions.
- The employer has the right to make donations, ensuring that they are ethical and in compliance with the policy and local applicable laws. Approval of donations will be granted by the Managing Director, and accurate records of all donations will be kept.
- The employer can conduct due diligence on third parties to ensure compliance with anti-bribery and anti-corruption policies. Misconduct by third parties may lead to strict consequences, and appropriate care must be taken in selecting and monitoring Third-Party Representatives.
- The employer reserves the right to conduct a fair and impartial investigation during the formal complaint stage, involving relevant parties, gathering evidence, and ensuring a transparent process that respects the principles of natural justice and can take necessary action based on the severity of the case leading up to termination. In case any such incident has been reported, the same should appear in the record and shall be published physically & digitally.

### **Employer Duties:**

- The employer has the duty to disseminate and communicate its Anti-Corruption and Anti-Bribery Policy to all members, ensuring that they are aware of the company's commitment to conducting business with the highest standards of professional integrity, honesty, and ethical conduct.
- The employer is responsible for conducting regular compliance training for all members, either online or in-person, to ensure they understand and adhere to the principles outlined in the Anti-Corruption and Anti-Bribery Policy. This duty extends to providing updates and repeat training at regular intervals or whenever there are updates to the training program.
- The employer has the duty to implement and enforce effective systems to counter bribery, corruption, and unfair trade practices, ensuring that all members at every level and cadre, as well as third parties, are held accountable for compliance with the policy.
- The employer is responsible for maintaining a record-keeping system that requires members to keep financial records and have appropriate internal controls in place. These records must evidence the business reason for making payments to third parties, and all accounts, invoices, memoranda, and other documents related to dealings with third parties should be prepared and maintained with strict accuracy and completeness.
- The employer has the duty to conduct appropriate and reasonable due diligence on the reputation and integrity of any business in which it makes investments, especially in the case of mergers and acquisitions, to assess the risk of corruption.
- The employer is obligated to define and regulate acceptable gifts and hospitality exchanges, ensuring that such exchanges are reasonable, proportionate, and comply with applicable laws. This includes overseeing that personnel do not accept or offer gifts, hospitality, or entertainment that could compromise their integrity or that of the company.
- The employer has the duty to prohibit its members, directly or indirectly, from being involved in bribery or kickbacks to any person, including government officials, clients, customers, competitors, and suppliers, which could constitute payment of any value representing free service or benefits of any kind.
- The employer is responsible for maintaining a zero-tolerance approach towards bribery, corruption, or any unfair trade practices and must take strict disciplinary action, including warning, penalty, suspension, dismissal, termination of services, or contractual/business relationship, against any member found engaged in such activities.
- The employer has the duty to ensure each member signs a written declaration affirming their non-involvement in any form of bribery or corruption on a periodic basis.



- The employer has the duty to encourage openness among members and support anyone who raises genuine concerns in good faith under the policy, ensuring that no one suffers detrimental treatment for refusing to take part in corruption or reporting concerns.
- The employer is obligated to keep reports of bribery or corruption incidents strictly confidential, assuring members that no adverse action will be taken against the member reporting the incident.
- The employer has the duty to ensure that all donations made by the company are ethical and in compliance with the Anti-Corruption and Anti-Bribery Policy and local applicable laws. Approval of donations must be granted by the Managing Director, and accurate records of all donations must be kept.
- The employer is responsible for conducting due diligence on third parties to ensure compliance with anti-bribery and anti-corruption policies. This duty includes evaluating and monitoring Trident's interaction with third-party representatives and taking appropriate measures against misconduct that may be construed as non-compliance with the policy.

### **Member Rights:**

- Members at Trident Limited have the right to be informed about the company's Anti-Corruption and Anti-Bribery Policy, ensuring that they are aware of the organization's commitment to conducting business with the highest standards of integrity, honesty, and ethical conduct.
- All members have the right to receive regular compliance training on anti-bribery and anti-corruption procedures. This training can be conducted online or in-person and should be designed to enhance members' understanding of the policy and their obligations.
- Members are entitled to a workplace environment that is free from bribery, corruption, and unfair trade practices. Trident Limited has a duty to implement and enforce effective systems to counter these practices, and members have the right to expect a commitment to compliance from the company and their colleagues.
- All members have the right to request guidance on recognizing and dealing with bribery and corruption issues. The company must provide clear and accessible information to assist members in understanding their responsibilities and identifying potential ethical dilemmas.
- Members possess the right to confidentiality when reporting incidents of bribery or corruption. The company is obligated to keep all reports strictly confidential, and no adverse action should be taken against members who report such incidents in good faith.
- Members have the right to refuse participation in bribery, kickbacks, or any other corrupt practices without fear of detrimental treatment. The company encourages openness and commits to supporting members who raise genuine concerns in good faith under the Anti-Corruption and Anti-Bribery Policy.
- Members possess the right to accurate record-keeping concerning financial transactions and hospitality exchanges. Trident Limited has the duty to ensure that members' records are subject to managerial review and that expenses related to hospitality or gifts are submitted in accordance with company policies.
- All members have the right to a workplace that conducts due diligence on third parties to ensure compliance with anti-bribery and anti-corruption policies. The company must take appropriate measures against any third-party misconduct that could be construed as non-compliance with the policy.
- Members at Trident Limited have the right to be free from coercion or retaliation for refusing to take part in corruption or reporting concerns under the Anti-Corruption and Anti-Bribery Policy. The company is committed to ensuring that no member suffers detrimental treatment for acting in good faith.
- Trident Limited recognizes members' right to a workplace that fosters ethical conduct, and this commitment extends to making donations that comply with ethical standards and local applicable laws. Members have the right to expect transparency and accuracy in the approval and recording of all donations made by the company.
- Members have the right to appeal against the decision made in case they are not satisfied with the same.

### **Member Duties:**

- Members at Trident Limited have the duty to actively participate in and complete the compliance training on

anti-bribery and anti-corruption procedures within the specified timeframe. This includes undergoing repeat training at regular intervals or whenever the training program is updated.

- All members have the duty to adhere to the principles outlined in the Anti-Corruption and Anti-Bribery Policy, ensuring that their conduct aligns with the highest standards of professional integrity, honesty, and ethical behavior.
- Members possess the duty to familiarize themselves with the guidelines and procedures outlined in the policy, in addition to other relevant corporate policies, including the corporate code of conduct and whistleblower policy.
- In adherence to our commitment to ethical business practices, each member is required to sign a periodic written declaration affirming their non-involvement in any form of bribery or corruption, underscoring our collective dedication to maintaining the highest standards of integrity and transparency.
- Members have the duty to report any incidents of bribery or corruption promptly and accurately to the Chief of IR. This includes providing necessary details and cooperating with any investigation that may follow.
- All members are obligated to keep reports of bribery or corruption incidents strictly confidential, recognizing the importance of protecting the identity of the reporting individual and the sensitive nature of such reports.
- Members have the duty make a declaration of all hospitality and/ or gifts accepted or offered, which will be subject to managerial review. This includes ensuring that all expenses and claims related to hospitality, gifts, or expenses incurred with third parties are submitted in accordance with the company's expenses policy.
- Members possess the duty to comply with record-keeping standards, maintaining financial records and internal controls that evidence the business reason for making payments to third parties. No accounts must be kept "off-book" to facilitate or conceal improper payments.
- Members at Trident Limited have the duty to refuse participation in bribery, kickbacks, or any other corrupt practices. This includes the responsibility to report any pressure or coercion to engage in corrupt activities to the Chief of IR.
- All members have the duty to conduct themselves ethically and transparently when interacting with third parties, including clients, suppliers, and business contacts. This includes adhering to the guidelines for acceptable gifts and hospitality exchanges outlined in the policy.
- Members possess the duty to participate in due diligence efforts related to third parties to ensure compliance with anti-bribery and anti-corruption policies. This includes providing information and cooperation as needed during the due diligence process.
- All members possess the duty to support a workplace culture that fosters ethical conduct and a zero-tolerance approach towards bribery, corruption, or any unfair trade practices. This includes actively contributing to the promotion of integrity and ethical behavior within the organization.
- All members are required to provide a signed declaration regarding adherence to the provisions of Anti bribery and anti-corruption policy.

For Trident Limited

Authorized Signatory