

<i>Guideline/Policy</i>	Business Area	Strategic Human Resource (SHR)
	Title	Diversity, Equity and Inclusion Policy
	Version	V4
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DOCUMENT HISTORY

Version	Date	Author	Brief Description of Change	Reviewed by
1	01/09/2020	SHR	To promote fair and equitable work environment for the members	Group Head HR
2	01/09/2022	SHR	NA	SHR
3	26/02/2024	SHR	Annual Revision & Addition of Employer and Members Rights & Duties	Process Owners & Knowledge Partners
4	26/07/2024	SHR	Review of Policy	Process owner

I. Introduction to the Policy

Trident is committed to ensuring the highest ethical and moral standards in the workplace. Trident Limited believes that the loyalty and commitment of its members depend upon the quality of life they are offered at work.

The purpose of the Diversity, Equity, and Inclusion Policy (the 'Policy') is to set out the commitment to an inclusive and supportive environment for members that is free from discrimination, where all are able to participate, and where everyone has the opportunity to express one’s own ideas.

This policy is committed to creating a culture that values and embraces individual differences, focusing on excellence by bringing diverse groups of people together and giving equal opportunity to everyone. The vision is to promote innovation, creativity, and productivity by attracting, hiring, engaging, developing, and advancing the best talent regardless of age, colour, gender, race, religion, family or marital status, language, ethnicity, or any other characteristic that makes them unique.

Our Diversity, Equity, and Inclusion Policy is guided by the United Nations Sustainable Development Goals to reduce inequalities and promote gender equality.

The words “This Company,” “The Company,” “Company,” and “Trident” wherever they occur in the policy shall mean “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. Key Definitions

- **Diversity:** It refers to the variety of differences and similarities among people, encompassing various dimensions such as race, ethnicity, gender, age, sexual orientation, socioeconomic status, physical abilities, religious beliefs, and more. It is a recognition and appreciation of the unique characteristics, backgrounds, experiences, and perspectives that individuals bring to a group, organization, or community.
- **Equity-** Equity refers to the fair and just treatment of all individuals, ensuring that everyone has equal access to opportunities, resources, and benefits. equity aims to eliminate disparities and create an inclusive environment where everyone can thrive, irrespective of their background, identity, or characteristics
- **Inclusion:** It refers to the practice of creating an environment where all individuals, regardless of their differences, feel valued, respected, and supported. It is about fostering a sense of belonging and ensuring that everyone has equal access to opportunities, resources, and benefits. Inclusion goes beyond mere tolerance of diversity; it actively seeks to involve and empower individuals from diverse backgrounds, experiences, and perspectives.

III. Scope

This Policy applies to all individuals working at all levels and cadres (whether permanent, fixed term, or temporary), directors, retainers, consultants, contractors, trainees, casual workers, or associated with us or any of our subsidiaries/associates in any other capacity. There is no exception to the adherence to this Policy.

IV. Policy

This Policy is about empowering people by respecting and appreciating what makes them different in terms of age, color, gender, race, religion, family or marital status, language, ethnicity, sexual orientation, education, ideologies, physical abilities, socio-economic status, political beliefs, and national origin.

This policy focuses on the following elements -

- Work Environment
- Ensuring an accessible workplace
- Discrimination
- Equal Opportunity Employer
- Harassment
- Diversity, Equity, and Inclusion Strategies

V. Business Implications

At Trident, all members, regardless of their abilities, disabilities, or health care needs, age, color, gender, race, religion, family or marital status, language, ethnicity, sexual orientation, education, ideologies, physical abilities, socio-economic status, political beliefs and national origin are Respected and Appreciated, as valuable members of the Company.

With the culture of inclusion, open communication and a relaxed work environment is created with inclusive policies for specially-abled members. Members feel valued and respected by equally and actively participating in ongoing events and initiatives resulting in greater collaboration, creativity, and a higher level of engagement among the members.

- **Work Environment**

Trident Group is committed to ensuring a safe and healthy working environment for all its members. The following activities are carried out on a regular basis to create a positive environment to help the members perform at their best:

- Implementation of Member friendly HR policies and practices
- Gathering regular feedback from members on new initiatives
- Focus on work-life balance to help members rejuvenate
- Asmita Leave for women members to fulfill their commitments towards their families
- Parental Leave of 7 days
- Flexibility to 'Work from Anywhere' on a need basis
- Flexibility of working hours
- Initiatives such as 'PanchSabha' which provide a platform for all members to share their concerns

- **Ensuring an accessible workplace**

Trident is committed to ensuring an accessible workplace for all individuals. This entails the following:

- Reasonable accommodations are facilitated, wherever required, to improve accessibility and create an inclusive work environment to maximize the ability of a member to perform the job. This includes accessible infrastructure such as ramps in buildings, pathways, gender-neutral bathrooms, accessible common areas, mobility support, comfortable workstations, screen readers and other supporting assistive devices, as needed.
- Information essential to the job and workplace, such as job instructions, member handbook, information on support facility, intranet, grievance procedures or health and safety procedures are communicated to members with disabilities in a format that ensures that they are fully informed.
- Members with disabilities are assisted in identifying their prospective next assignment/available opportunity.
- Condition of the applicant's and member's disability shall be considered in determining the location of work. Trident's Human Resource department shall invite members to provide their input on how they can foster the inclusion of members with disabilities.

- **Discrimination**

We at Trident Limited are committed to eliminating unlawful discrimination and promoting equality and diversity. Discrimination based on age, gender, ethnicity, religious beliefs, sexual orientation, education, ideologies, physical abilities, socioeconomic status, political beliefs, national origin, etc. is prohibited at Trident.

We are committed to complying in both letter and spirit with all antidiscrimination legislation and associated codes of practice in force either now or in the future.

If any act of discrimination is noticed or reported, the matter is investigated, and necessary action is taken to deliver justice to both the accused and victim as per the policies of the Company.

The following are the kinds of discrimination which are against the Company's policy:

- **Direct discrimination**, where a person is treated less favorably based on an unlawful ground.

- **Indirect discrimination**, where a provision, criterion, or practice which seems to be lawful would create a significant disadvantage for a substantial number of one group of persons compared with other persons based on an unlawful ground unless that provision, criterion, or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.
- **Victimization**, where someone is treated less favorably than others because he or she has taken action in respect of discrimination on unlawful grounds.

Listed below are a few significant acts of discrimination that are forbidden at Trident:

- Stating or suggesting preferred candidates for consideration in the recruitment process
- Excluding potential candidates for consideration in the recruitment process
- Paying different compensation packages to members in the same cadre
- Denying compensation or benefits to certain members
- Discriminating when assigning disability leave, maternity leave, retirement options or any other privileges allowed from time to time
- Denying the use of company facilities

The above points are only indicative and as such Trident prohibits any discrimination among its members.

- **Equal Opportunity Employer**

Trident Group believes in giving equal opportunity to all its members and is committed to providing an equal and inclusive workplace free from any unfair treatment or unlawful discrimination. This applies to all member policies and processes including but not limited to the following:

- Recruitment, selection, career progression
- Terms and conditions of employment
- Working environment
- Training and development
- Redundancy and re-deployment

Employment opportunities are generated as per business requirements and decisions are taken based on job requirements and individual qualifications irrespective of age, gender, ethnicity, religious beliefs, sexual orientation, education, ideologies, physical abilities, socio-economic status, political beliefs, national origin, etc.

At the time of hiring or promotion, every member is evaluated only for his/her potential and performance. A fair and transparent process is followed to come to any conclusion.

Details regarding equal opportunity are outlined in Trident's independent policy titled "Equal opportunity and fair treatment policy" and this part of the policy must be read in conjunction with the same.

- **Harassment**

Any unwanted or unwelcomed behaviour which can undermine the dignity of a person can be described as an act of harassment. Harassment can be of different forms- verbal, visual or physical leading to a hostile or intimidating work environment where the safety and comfort of members are at stake.

Listed below are a few examples of harassment that are forbidden at Trident.

- Verbal conduct such as epithets, derogatory jokes, or comments, slurs, or unwanted sexual advances, invitations, or comments
- No member can communicate in an abusive either verbally or through non-verbal including threatening, fighting, or abusive communication, etc. with supervisors, peers, subordinates, etc.
- Visual conduct such as derogatory and/or sexually-oriented posters, photography, cartoons, drawings or gestures

- Physical conduct such as assault, unwanted touching, blocking normal movement or interfering with work because of personal characteristic
- To achieve production targets or to get any job completed for that matter, one must not exceed professional decorum and display any rude, aggressive, or untoward behavior towards subordinates or peers, etc.
- Threats and demands for sexual favors as a condition of continued employment or to avoid some other loss, and offers of employment benefits in return for sexual favors
- Retaliation for having reported or threatened to report harassment

The above points are only indicative and as such Discrimination of any type is prohibited in Trident.

- **Diversity, Equity and Inclusion Strategies**

This policy section focuses on Trident's practices that ensure different groups or individuals of different backgrounds are culturally and socially accepted and integrated into the workplace.

A few initiatives undertaken are discussed below:

- Creating a top-level focus and strategy at the CHRO level
- Training people at all levels on topics like unconscious bias, similarity bias, structural bias, and self-rater bias
- Integrating diversity, equity and inclusion strategies in recruitment, management, leadership assessment, training
- Foster open and inclusive communication. Use inclusive language, celebrate diversity in internal and external communications, and encourage feedback
- Prioritize diversity, equity and inclusion in leadership development programs. Ensure that leaders at all levels understand the importance of inclusivity.
- Creating member networks (D,E&I champions, Member Resource Groups) to bring people together and implement new ideas
- Creating an internal and externally visible scorecard to measure progress in all areas. Such scorecards include metrics for recruiting, promotion rates, compensation levels, participation in coaching programs, turnover, participation in ERGs, and much more.
- Include individuals with diverse skillsets on Board to represent diverse viewpoints and ensure that all Board Diversity-related metrics are reported in its Annual Corporate Governance Report
- Encourage and facilitate members to participate in mentoring and personal development programs. Implement mentoring and sponsorship programs that connect individuals from underrepresented groups with mentors or sponsors who can support their career development.
- Ensure that adequate resources are made available to fulfil the objectives of the policy

By integrating these strategies, Trident can build a more inclusive culture that values diversity, fosters belonging, and maximizes the potential of all individuals. The goal is to create environment where everyone feels respected, supported, and empowered to contribute their unique perspectives and talents.

Monitoring & Reviews

The diversity team will establish appropriate information and monitoring system to assist the effective implementation of the policy. The effectiveness of the policy will be reviewed on an annual basis and necessary changes will be made from time to time. For example, where monitoring identified an under representation of a particular group, Trident shall develop an action plan to address the imbalance.

VI. Grievance Mechanism

Members who believe they have been subjected to discrimination or harassment that conflicts with the company's diversity policy and initiatives should seek immediate assistance from a supervisor or the Human Resources Department.

All complaints/ grievances will be taken with utmost seriousness and fairness. The Human Resources Department is specifically sensitive to the concerns expressed in this regard and always maintains the confidentiality of the aggrieved as far as practicable. No complaint shall be considered as retaliation in any manner by Trident Limited.

Any member found to have exhibited inappropriate conduct or behaviour against others may be subject to disciplinary action, up to and including termination.

The particulars about the grievance mechanism are delineated in Trident's autonomous policies, namely the "Grievance Handling Policy" and the "Policy on Disciplinary Practices and Procedure." This section of the policy must be construed in conjunction with the documents above.

VII. Consequences of Non-Adherence

Members are responsible for:

- Upholding and implementing the aims of this policy
- Contributing to a safe and inclusive environment that celebrates diversity
- Refraining from engaging in any kind of conversation, discussion or activity that indicates explicit or implicit bias towards any section of members is Violation of the Policy

Non-Adherence to this policy can lead to several implications as follows:

- Dissatisfaction among members reducing participation level and contribution towards the goal
- Increase in the hiring and training cost of new talents,
- The inconsistent performance of existing and new talent,
- Increase in the attrition rate, and
- Reducing sense of belongingness among the members.

Members who do not comply with this Policy and/or are found to have engaged in discrimination, harassment or bullying, will be subject to appropriate disciplinary action, up to and including termination of employment.

VIII. Exception

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

IX. Governance -

Responsibility Matrix

1	Implementation/Execution	TA Team, DE&I Team, HRBP
2	Monitoring	Corporate HR
3	Auditing	CHRO/ Business Head/ Group Head HR & IR
4	Ownership	HR Team

The policy will be monitored and reviewed regularly to measure its progress and judge its effectiveness. In particular, we will record and consider the number and outcome of complaints of discrimination made by members, clients, contractors and other third parties and the details of any potentially unlawful grounds for discrimination involved in any disciplinary action taken against members. Any changes required will be made and implemented.

Employer Rights:

- The employer has the right to enforce the Diversity, Equity and Inclusion Policy, ensuring that all members adhere to the principles outlined in the policy.
- The employer has the right to investigate complaints related to discrimination, harassment, or any violation of the Diversity, Equity and Inclusion Policy. This includes the right to take appropriate disciplinary action based on investigation findings.
- The employer has the right to take disciplinary action, including termination of employment, against members who do not comply with the Diversity, Equity and Inclusion Policy or engage in discriminatory or harassing behavior.
- The employer has the right to monitor and review the effectiveness of the Diversity, Equity and Inclusion Policy, making necessary changes to address any identified issues.

Employer Duties:

- The employer is responsible for providing a safe and healthy working environment for all members, free from discrimination and harassment and to ensure it, the company carries out various activities like implementing member-friendly HR policies, gathering regular feedback from members on new initiatives, providing Asmita leave for women, flexibility of “Work from Anywhere”, etc.
- The employer has a duty to implement inclusive policies, such as reasonable accommodations and accessible infrastructure, to ensure equal opportunities for all members, including those with disabilities.
- The employer has a duty to take proactive measures to prevent discrimination, including the development and implementation of policies, training programs, and awareness initiatives.
- The employer is obligated to investigate complaints of discrimination or harassment promptly and thoroughly, ensuring a fair and impartial process.
- The employer has a duty to implement and maintain diversity, equity, and inclusion strategies, fostering an inclusive culture throughout the organization.
- The employer is responsible for maintaining confidentiality during investigation and grievance resolution process to protect the privacy of the individuals involved.
- The employer is responsible for establishing monitoring systems to assess the effectiveness of the Diversity, Equity and Inclusion Policy, conducting annual reviews, and making necessary adjustments.

Member Rights:

- Members have the right to work in an environment free from discrimination based on various factors, as

outlined in the Diversity, Equity and Inclusion Policy.

- Members have the right to equal opportunities in recruitment, career progression, training, and other employment-related processes, irrespective of personal characteristics.
- Members have the right to report any observed or experienced discrimination, harassment, or violation of the Diversity, Equity and Inclusion Policy without fear of retaliation.
- Members have the right to expect confidentiality during the grievance resolution process to protect their privacy.

Member Duties:

- Members have a duty to adhere to the principles outlined in the Diversity, Equity and Inclusion Policy and other relevant company policies.
- Members are responsible for contributing to a safe and inclusive environment that celebrates diversity and respects the rights of others.
- Members have a duty to cooperate with any investigations related to discrimination or harassment, providing information as needed.
- Members must refrain from engaging in any behavior that indicates explicit or implicit bias towards any section of members, as it violates the Diversity, Equity and Inclusion Policy.
- Members may be required to participate in training programs related to diversity, equity, and inclusion to enhance awareness and understanding.
- Members have a duty to report any observed or experienced violations of the Diversity, Equity and Inclusion Policy and other relevant policies to the appropriate authorities within the company.

For Trident Limited

Authorized Signatory