

<i>Guideline/ Policy</i>	Title	Employee Code of Conduct
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Document History

Version	Date of Amendment	Author	Brief Description of Change	Reviewed By
1	26/02/24	SHR	New Policy Implementation	Process Owners & Knowledge Partners
2	26/07/2024	SHR	Review of Policy	Process Owner

I. Introduction

Trident Group acknowledges the importance of implementing a Code of Conduct policy to guide its members in maintaining standards for business relationships, official engagements, social behavior, and camaraderie within and outside office premises. This policy is designed to uphold a culture of professionalism and integrity throughout the organization. Trident Group's Code of Conduct aims to uphold the highest ethical standards, ensuring compliance with laws, fostering respectful stakeholder relationships, and promoting environmental responsibility. The objective is to create a transparent and conducive work culture that values integrity, diversity, and sustainability.

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. Scope

The Code of Conduct of Trident Group is applicable to all members (including contractual members), governing their conduct, ethics, and compliance in all business dealings. It encompasses professional behavior, legal adherence, and environmental responsibility, fostering a culture of integrity both within and outside the organization. This code is mandatory for all personnel and is subject to periodic reviews to ensure ongoing relevance and effectiveness.

III. Key Definitions

Bribery: Any attempt to obtain undue advantages or rewards for improper performance of official duties.

Bullying: Refers to persistent or repeated unwanted criticism, threats, abuse or insults – behavior or written messages (publicly or privately) which humiliates or affects the dignity of an individual.

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.

Member

Equal Opportunity: Refers to equal opportunity for members means providing fair and unbiased treatment, irrespective of personal characteristics, fostering diversity, and ensuring all individuals have an equal chance to succeed within the workplace. It involves non-discrimination, inclusive practices, and a commitment to merit-based decisions.

Fair Treatment: The principle that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

Harassment: It is a form of discrimination which can be defined as conduct that is unreasonable, not welcome, offensive, or which creates an intimidating, hostile or humiliating work environment.

'In Kind' or Gift: Includes hospitality, cash, loans, personal advantages, and other items. Regulations are as per applicable norms.

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.

Manager/Supervisor: Includes any such person responsible for the affairs of the company at that particular location or site or any person to whom any affected person with any grievance reports or is directly responsible for compliance of statutory laws at the factories site for redressal of the grievance.

Sexual harassment: Any unwelcome sexually determined behaviors, demands for sexual favors, physical conduct, verbal harassment, and any behavior perceived as having sexual overtones.

IV. Policy Description

This Code outlines guidelines and the vision statement for all members. This Code focuses on the following elements:

- Vision and Values
- Compliance with the Law
- Integrity
- Political Activities
- Insider Trading
- Conflict of Interest
- Confidentiality
- Intellectual Property Rights (IPR)

- Human Rights
- Equal Opportunity Workplace
- Diversity and Inclusion
- Anti-Discrimination
- Anti-Harassment
- Dignity and Respect
- Anti-Intoxication
- Environment, Health and Safety
- Communication and Public Relations
- No Double Employment
- Freedom of Association
- Non-Solicitation
- Use of Company Assets and Property
- Dress Code Ethics
- Environmental, Social and Governance (ESG)
- Individual Conduct
- Fair Marketing Practices
- Customers
- Fair Competition
- Quality
- Duty to Report
- Violation of the Code of Conduct

- **Vision and Values**

Our Vision:

Applicable to every member of the Trident Group and its affiliated companies, our vision is a collective commitment. Driven by a passion for overcoming challenges, we aspire to enhance the quality of life and achieve global prosperity together.

Inspired by Challenge

- Open to challenge
- Optimistic towards new vistas

Add Value to Life

- Indulge in community service
- Take care of environment

Together Prosper Globally

- Work in union
- Succeed globally

Integrity and Transparency

- Maintaining ethical standards
- Sincerity
- Fairness at workplace

Trident's Core Values:

At Trident, we are dedicated to ensure customer satisfaction through collaborative teamwork grounded in principles of honesty and integrity. Our commitment to continuous growth and development underpins these values, driving our pursuit of excellence.

Customer Satisfaction:

- Take feedback and improve
- Work tirelessly to delight the customer
- Communicate every detail of the product honestly

Teamwork:

- Appreciate and reward members
- Encourage an environment of trust within the team
- Provide/seek the necessary resources for team's success

Honesty and Integrity:

- Courage to confess mistakes
- Keep personal and official interests separate
- Adhere to Company Policies and Code of Conduct

Continuous Growth and Development:

- Undergo trainings for continuous growth & development
- Create an atmosphere of self-leadership and self-determination

• Compliance with the Law

At Trident Group, we uphold a commitment to full compliance with both domestic and international laws, regulations, and statutory requirements applicable to our business operations across various countries. Each member of the Trident team bears the responsibility to stay informed about and acquainted with the rules relevant to their role, location, and working environment. Engaging in any activities that may lead to unlawful practices for both the individual member and the company is strictly prohibited.

To ensure adherence to law, members to:

- Thoroughly acquaint all pertinent rules, regulations, and statutory requirements applicable to Trident Limited, specific job role, location, and work environment.
- For any inquiries concerning the rules or statutory regulations relevant to the scope of work, seek guidance from respective business manager or the Legal Department.

This commitment to compliance not only reflects our dedication to legal integrity but also safeguards the reputation and ethical standing of Trident Group in the global business landscape.

- **Integrity:**

- **Bribery, payment of gifts and offering entertainment / Anti-Corruption Influence Peddling**

At Trident Group, we are steadfast in conducting all business activities with the highest standards of professional integrity, honesty, and ethical conduct. Our policy is aimed at preventing bribery, corruption, and unfair trade practices.

Any form of bribery in cash or kind like tickets to entertainment events, special discounts, etc. including improper offers of payments or gifts is strictly prohibited. Members should avoid any contracts that might lead to, or suggest, a conflict of interest between personal activities and the business and should not have any non-official cash, cheque, loans or other similar transactions under any circumstances with customers, vendors or third parties. Members should be careful while handing out payments or gifts or offering entertainment and not give nor accept (directly or indirectly) hospitality, gifts or donations that are intended for the purpose of obtaining business or might appear to incur an obligation.

Members are recommended to:

- a. Always check with the manager before giving or accepting any payments, gifts or entertainment in case one is unsure of whether it conforms to the company's policy or not.
- b. This could extend to charitable donations as well, if they are or could be construed to have been made to aid a possible advantage.
- c. Pay special attention to any gift or entertainment which is meant for a government team member or public official.
- d. To accept and offer nominal gifts which are customarily given and are of commemorative nature for special events.
- e. If a gift of value greater than the equivalent of five thousand rupees has to be given, for any compelling reason, member should get this sanctioned by Business Head.

Disciplinary Action- Trident Group adopts a zero-tolerance approach towards bribery, corruption, or unfair trade practices, inside or outside the company premises. Members engaged in bribery or corrupt practices are subject to the strictest disciplinary action, including dismissal. Personal liability for legal consequences exists for any deviation from this policy.

Reporting Procedure:

Trident Group is committed to uphold the highest ethical standards, and all members are encouraged to report any suspected bribery or corruption, ensuring a transparent and fair business environment.

Details related to reporting procedures are highlighted in "Procedure for Anti-Corruption" and "Procedure to deal with cases of corruption or bribery" and this part of policy must be read in conjunction with the same.

Details related to anti-bribery and anti-corruption provisions may be referred to in Trident's independent policy titled "Anti-Bribery and Anti-Corruption Policy" and this Code must be read in conjunction with the same.

- **Recording Financial Transaction**

Ensuring financial integrity is a cornerstone of our company's reputation and credibility. If member role involves financial transaction recording, it is imperative to be well-versed with relevant company policies.

Members are expected to:

- a. Accurately record all transactions to the best of their knowledge
- b. Look out for undisclosed or unrecorded funds, assets or liabilities
- c. Immediately inform the manager in case of any errors for prompt corrections

o **Fraud, Dishonesty or Criminal Conduct**

We are an organization committed to uphold the highest standards of integrity, and we place a significant emphasis on maintaining trust and credibility in all our dealings. As a member of the Trident Family, it is expected to adhere to the following principles when interacting with colleagues, business partners, and suppliers, specifically in matters related to fraud, dishonesty, and criminal conduct:

- a. **Integrity and Ethical Conduct:** Demonstrate unwavering integrity in all professional activities. Uphold honesty and ethical behavior, avoiding any form of deceit, fraudulent actions, or criminal conduct.
- b. **Zero Tolerance for Fraud:** We have a zero-tolerance policy for fraud and dishonesty. Any form of deceptive practices, misrepresentation, or fraudulent behavior will not be tolerated within our organization.
- c. **Legal Compliance:** Member must adhere strictly to all applicable laws, regulations, and policies related to one's role. Ensure that the actions and decisions align with the highest legal and ethical standards.
- d. **Report Suspected Fraud:** If one is aware of any fraudulent activities or dishonest behavior within the organization, it is member's responsibility to promptly report such incidents to the designated authority or department. Whistleblower mechanisms are in place to facilitate the reporting of concerns.
- e. **Consequences of Unethical Behavior:** Engaging in fraudulent, dishonest, or criminal conduct will result in serious consequences, including disciplinary actions, termination of employment, and legal repercussions, as deemed appropriate.
- f. **Promote a Culture of Compliance:** Actively contribute to foster a culture of compliance and integrity within the organization. Encourage colleagues to uphold ethical standards and report any concerns related to fraud or dishonest behavior.
- g. **Legal Consequences:** Understand that engaging in criminal conduct not only jeopardizes one's position within the organization but may also lead to legal consequences. It is essential to conduct all business activities with the utmost transparency and legality.

By embracing these principles, we collectively contribute to a workplace environment that values transparency, trust, and ethical behavior. Upholding these standards is crucial for the reputation and success of our organization.

• **Political Activities:**

Members are expected not to indulge in political activities that may have the potential to harm the Company's brand value or reputation. In this regard, when joining any political party or supporting any particular affiliation, members are deemed to be independent entities and do not represent Trident or Trident's business interests.

• **Insider Trading**

Members shall maintain confidentiality of all unpublished price-sensitive information. Members are prohibited from using unpublished price-sensitive information for dealing in Trident Group's securities or providing such information to others who may deal in them. The Company considers it improper

and inappropriate for Insiders to engage in short-term or speculative transactions in the Company's securities or in other transactions that may lead to inadvertent violations of the insider trading laws.

Unpublished price sensitive information shall be disseminated only to those within Trident who require the particular information in order to discharge their duty.

Members are expected not to:

- d. Directly or indirectly trade in securities that are listed or proposed to be listed when in possession of unpublished price sensitive information.
Trade in securities of the Company except when the trading window is open, and the member is not in possession of unpublished price sensitive information.

- **Conflict of Interest**

As an organization committed to transparency, fairness, and ethical conduct, Trident Group places significant emphasis on avoiding conflicts of interest. All members of the Trident Group are expected to adhere to the following principles when navigating situations involving potential conflicts of interest:

- **Disclosure and Transparency:** Timely disclose any situation that may give rise to a conflict of interest. Comprehensive and transparent disclosure enables the organization to assess and address potential conflicts in a fair and timely manner.
- **Avoidance of Personal Gain:** Abstain from participating in activities that could lead to personal gain, whether financial or otherwise, at the expense of Trident Group's interests. This encompasses refraining from financial investments, relationships, or associations that may compromise objectivity.
- **Prioritizing Organizational Interests:** Always prioritize the interests of Trident Group over personal interests. When confronted with a decision, consider its alignment with the organization's best interests and refrain from any actions that could be perceived as conflicting.
- **Non-Compete Commitment:** Members are prohibited from engaging with any company, firm, or individual in a business that is directly competing with Trident Group or undermining its interests during the service and at least for one year after leaving the company's services. This commitment extends to business relationships, partnerships, or engagements that may pose a conflict with the organization's objectives. Engaging in any business, financial or otherwise, outside of job responsibilities requires prior permission. Members must ensure that such activities do not adversely affect their work at Trident Group or conflict with the company's interests. Information regarding interests in competitor companies or employment of close relatives in competitor companies, or customers and suppliers of any of Trident Group's affiliated companies should be shared with the HR Team.
- **Prompt Reporting:** If member become aware of a potential conflict of interest involving self or a colleague, promptly report it to the designated authority or department. Timely reporting facilitates a thorough evaluation and appropriate resolution.
- **Recusal from Decision-Making:** In situations where a conflict of interest may arise, voluntarily recuse from decision-making processes or discussions related to the matter. This ensures impartial decision-making in the best interests of Trident Limited. **Consequences of Non-Compliance:** Failure to adhere to policies related to conflicts of interest may result in disciplinary actions, including warnings, reassignment, or termination of employment. In case any such incident has been reported, the same should appear in the record and shall be published physically & digitally.

By embracing these principles, we collectively contribute to maintain the integrity of Trident Group and foster a culture of trust and transparency. Upholding these standards is crucial for the continued success and reputation of our organization.

- **Confidentiality:**

At Trident Group, safeguarding confidential company information from unauthorized disclosure is of paramount importance. Authorized sharing of this information is restricted to individuals with a legitimate need to be informed. Members are prohibited from engaging, directly or indirectly, with any company, firm, individual, or business that competes with Trident Group for one year after the termination of their services.

All members are expected to uphold the confidentiality of information handled by the company. Company documents and records, often containing sensitive business information, must not be disclosed to any third party. Throughout employment and thereafter, members are not allowed to disclose, use, or cause any unauthorized disclosure of confidential information related to processes, formulae, specifications, research and development projects, services, dealers, distributors, retailers, agents, suppliers, customers, or any other trade secrets.

In order to maintain data integrity, entries should be made such that the records cannot be altered or damaged. Entries should only be made at places where they ought to be and not on any loose papers or any other temporary medium. Data must be retained for relevant retention period in accordance with the document retention procedures and applicable laws and regulations.

Upon request or upon resignation or termination of employment, members are required to surrender all documents and electronic data records, including copies made or received for the company. No copies or data should be removed from company premises or stored on personal devices.

- **Sharing of Confidential Information**

Members should share confidential information only with those who have a legitimate need to know. Confidentiality obligations extend beyond employment cessation, requiring continued protection of company information. Each of us is responsible for helping to ensure the information we record is accurate and complete and maintained in a manner consistent with internal policies and procedures and regulatory requirements.

Members are expected to:

- a. Share confidential information only with authorized individuals.
- b. Ensure written agreements with third parties for confidentiality.
- c. Seek manager consultation before transmitting sensitive information to third parties.

- **Email and Information Technology (IT) Systems**

Confidentiality and integrity of information used to access Trident Group's systems should be maintained. Company email and IT systems are to be used primarily for job-related communications. Inappropriate websites should not be accessed from work systems, and inappropriate or offensive communication is strictly prohibited.

Members are expected to:

- a. Keep passwords and personal security codes confidential.
- b. Contact the IT Department for any breaches and reset passwords immediately.
- c. Ensure that sensitive information related to Trident is sent via encrypted emails.
- d. Be suspicious of unknown links or requests and not open email attachments from unknown

sources.

- e. Verify the authenticity of emails received by contacting the sender directly.

Details regarding information systems are outlined in Trident's independent policy titled "Information Security and Management System (ISMS) Policy" and this code must be read in conjunction with the same

- **Intellectual Property Rights (IPR)**

Trident Limited's intellectual property rights, comprising logos, copyrights, and patents, are vital to our identity and business. As a member, it is member's responsibility to ensure their proper use in line with guidelines.

Members are expected to:

- Adhere to brand guidelines when using the logo or brand elements.
- Obtain written agreements before allowing third-party use of any logo or brand elements.
- Use others' intellectual property rights based on agreements with the owner.
- Report any suspected misuse of Trident's intellectual property to the Legal Department.
- Consult the Legal Department before responding to queries or comments on intellectual property rights.

- **Human Rights**

At Trident, our commitment to make a positive impact on the world goes hand in hand with our unwavering respect for human rights. We understand the vital role we play in upholding internationally recognized human rights standards throughout our business operations. Our pledge extends to ensure a safe, lawful, and diverse environment within our workplace, supply chain, and the communities we engage with every day.

Guided by foundational documents such as the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Permanent Forum on Indigenous Issues, and the United Nations Guiding Principles on Business and Human Rights, our Human Rights Policy underscores our commitment to ethical practices.

- **Our Commitment**

Trident Group is dedicated to identify, prevent, and mitigate potential adverse impacts on human rights resulting from our business activities.

- **Community and Stakeholder Engagement and Respect**

Recognizing our influence on local communities, we actively engage with stakeholders to understand and consider their perspectives. We foster dialogues on human rights issues and contribute to the well-being of the communities we operate in through locally relevant initiatives.

- **Our Approach**

Human Rights priority areas for members have been identified as follows:

- a. **Right to choose employment freely:** We encourage members to freely choose their employment as per the availability of the job and the requirement of skills.
- b. **Regular Employment:** We, as a company, believe that our members are the most critical asset. Therefore, we endorse regular employment which embarks a sense of security and fosters the bond between the company and the members.

- c. **Valuing Diversity:** Trident values the diversity of the people with whom we work and the contributions they make. We do not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind.
- d. **Freedom of Association and Collective bargaining:** Trident respects workers' right to collectively bargain through various committees in place and are free to elect their representatives.
- e. **Safe and healthy workplace:** Trident is committed to provide a safe and healthy workplace, in line with sustainability development goals.
- f. **Workplace security:** Trident is committed to maintain a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.
- g. **Modern slavery, Human trafficking and forced labour:** Trident Ltd has a zero-tolerance policy towards modern slavery. Trident strives to ensure that its operations and value chain are free from any form of modern slavery and forced labour, in accordance with the United Nations Global Compact Principle 4, and ILO Forced Labour Convention, 1930.
- h. **Child labour:** Trident promotes the right to safe childhood and will not tolerate employment of child labor or exploitation of children in any of its operations and facilities in line with SDG.
- i. **Inclusive Workplace:** Trident's operations and facilities strongly advocate for the promotion of awareness and empowerment of individuals with disabilities, as well as the expansion of employment prospects for this demographic.
- j. **Young Workers:** "Young worker" refers to any person above the age of 15 years, but not completed the age of 18 years. For the protection of young workers, Trident bars the employment of young workers in any hazardous occupations or processes.
- k. **Work Hours, wages and benefits and Right to Work:** Trident honours its responsibility to ensure dignity of members and members and provide them with decent wages and good working hours.
- l. **Rights of Women:** Trident is committed to ensure the rights and dignity of its female members, as well as building a culture of gender equity.
- m. **Disciplinary Practices:** Trident Ltd strives to treat its members with utmost love, dignity and respect. All disciplinary actions, if any, will be in accordance with the law of the land.
- n. **Foreign Workers:** Trident is committed to ensure the rights and dignity of any foreign workers employed in its operations.

- o. **Grievance Mechanism**

Details related to receipt of Complaint and take appropriate measures on such complaints are duly addressed in "Human Rights policy." and this part of the code must be read in conjunction with the same.

- o. **Competing Obligations**

In cases where International Human Rights Principles conflict with national laws, we strive to promote and uphold international human rights principles to the highest extent possible however for the benefit of entire workforce, beneficial legislations shall be adopted.

Details regarding human rights are outlined in Trident's independent policy titled "Policy on Human Rights" and this part of the policy must be read in conjunction with the same.

- **Implementation of the Policy:**

Our Board of Directors and Group Leadership Team oversee the implementation and compliance with the Human Rights Policy.
- **Application of the Policy:**

The policy extends to Trident Group, entities we own or hold a majority interest in, and the facilities we manage. We encourage our partners and suppliers to adopt similar policies. We give due consideration to human rights when deciding to engage or end business relationships
- **Our Priority Areas:**

Recognizing our responsibility to respect all human rights, we identify key priority areas relevant to our operations and proactively address potential risks. We prioritize ongoing consultation with local communities to better understand and respond to human rights concerns.
- **Forced Labour, Child Labour, and Human Trafficking:**

We prohibit the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking. We do not employ children below the minimum age provisions as per applicable laws and require that our suppliers/service providers also adhere to the same standards. We are committed to ensure that our operations and supply chains are free from modern slavery practices. We set clear expectations for our members, contractors, business partners and suppliers to encourage the disclosure of potential human rights breaches and are prepared to take steps to prevent and address it
- **Work Hours, Wages and Benefits and Right to Work**

We compensate members competitively relative to the industry and local labour market with due consideration of living wage. We operate in full compliance with applicable wage, work hours, overtime, and benefits laws. We verify that all members have the right to work in the jurisdictions in which they are employed.
- **Welfare Provisions and Facilities:**
 - a. Separate enclosures and clean, sanitary washroom facilities for male and female workers
 - b. Canteen facilities
 - c. Clean drinking water facility
 - d. Crèche facility for children below age of 6 years
 - e. Availability of First aid boxes and medical assistance
 - f. Availability of Sanitary Napkins
- **Night working facility:**

In adherence with regards to section 66(1)(b) of Factories Act 1948, women working at night shift during the time period of 10.00 PM to 5.00 AM, Factory ensures all the necessary steps towards the safety of it's women workforce which includes but not limited to:

 - a. No section shall deploy less than 10 members at night, and total numbers of female members should not be less than 25 or two third of the entire workforce in a unit / section whichever is less.
 - b. Adequate amount of lighting is provided where women members are appointed for work during night hours.
 - c. Separate sitting place in the canteen shall be provided.
 - d. Separate vehicle shall be provided for transport.
- **Prohibition of Modern Slavery:**
 - a. Trident Group has zero tolerance policy for Modern Slavery which includes any form of slavery, servitude, forced and compulsory labor which in any way affects the freedom to work of any individual entailing exploitation of their personal liberty for gains whether

financial or otherwise. Trident has always believed in ethical business practices and ensuring high integrity in our business dealings and relationships to ensure that any practice even related to Modern Slavery is not taking place within our organization or in any of our business. Best possible attempt has been made to eradicate the practice of modern slavery in any of its grammatical notions. We expect our suppliers and business partners to hold their own suppliers to the same high standard.

- Ongoing Improvement:
Committed to continuous improvement, we regularly assess and enhance our human rights due diligence and remediation processes to adapt to evolving risks.

- **Equal Opportunity Workplace 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. At Trident Group, we recognize and value the uniqueness of individuals, drawing on their diverse perspectives and experiences to enhance our collective value.

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

Policy Framework

- **Recruitment & Sourcing** - Employment decisions at Trident Group are based on merit, ensuring that no applicant receives less favorable treatment on any grounds.
- **Promotion & Growth** - Advancements are contingent on performance, achievement of KPI & OKRs, or any other performance measure defined by the company.
- **Training & Development** - Training opportunities are provided based on performance, ability, and potential, ensuring equal access for all members.
- **Grievance Handling** - Disciplinary actions are taken based on pre-defined objective criteria, ensuring fair treatment of all members. Grievances are addressed impartially.
- **Separation** - The company monitors the separation process to ensure fairness, conducting mandatory exit interviews for all members.

As business practice, Trident Group's practices and employment decisions, including those regarding recruitment, hiring, assignment, promotion, compensation, benefits, training, discipline, and termination shall not be based on any person's age, color, national origin, citizenship status, physical or mental disability, medical condition, race, religion, creed, gender, sex, sexual orientation, gender identity and/or expression, genetic information, marital status, status with regard to public assistance, veteran status, or any other characteristic protected by federal, state, or local law.

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.

- **Diversity and Inclusion**

Trident Group is committed to ensuring a safe and healthy working environment that is diverse, inclusive and free of all kinds of discrimination for all its members.

At Trident, all members, regardless of their abilities, disabilities, or health care needs, age, colour, 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.

This part of the policy focuses on the following elements –

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

Members are expected to –

- treat others and their ideas with respect.
- assign work and make work-related decisions solely on the basis of qualifications, abilities and potential.

Members are required to follow the abovementioned guidelines and ensure that inclusivity is upheld in the workplace. Details regarding diversity and inclusion are outlined in Trident’s independent policy titled “Diversity, Equity and Inclusion Policy” and this part of the policy must be read in conjunction with the same.

• **Anti-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 in Trident.

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

- **Direct discrimination**, where a person is treated less favorably on the basis of a ground which is unlawful;
- **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 on the basis of 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;

Every individual associated with Trident Group, whether a member, manager, or stakeholder, is expected to contribute to maintaining a culture that is anti-discriminatory in nature where no person feels uncomfortable.

Members are expected to –

- not to distribute or display discriminatory material.
- judge others on their performance and not on any other discriminatory parameter.

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.

- **Anti-Harassment**

- **Workplace Harassment**

Any unwanted or unwelcoming 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.

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

All members are free to report these kinds of incidents to Human Resource department. All such reports will be kept highly confidential. No action will be taken against any member reporting the incident. No complaint shall be considered as retaliation in any manner by Trident Limited.

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.

- **Sexual Harassment**

Trident Group is dedicated to integrating ethical sourcing practices and maintaining a workplace free from sexual harassment. This policy aligns with The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

Sexual Harassment could include any unwelcomed sexually determined behaviour (directly or through implication) like physical contact and advances by the member(s) including:

- a. A demand or request for sexual favors, sexually colored remarks, showing pornography, any other unwelcome physical conduct of sexual nature, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs;
- b. Eve teasing, innuendos and taunts, physical confinement against one's will;
- c. A demand or request for sexual favors, whether verbally or non-verbally, where the submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or promotion/evaluation of work thereby denying an individual equal opportunity at employment;
- d. An act or conduct by a person in authority which makes the environment at workplace hostile or intimidating to a person or unreasonably interferes with the individual's privacy and productivity at work;
- e. Verbal harassment of a sexual nature, such as lewd comments, sexual jokes or references, and offensive personal references; demeaning, insulting, intimidating, or sexually suggestive comments (oral or written) about an individual's personal appearance or electronically transmitted messages (Jokes, remarks, letters, phone calls);
- f. Any other behavior which an individual perceives as having sexual overtones.

Procedure to Register Complaint:

- Written Complaint Mode: Individuals can file a written complaint within three months of the occurrence (extendable to six months under exceptional circumstances). Trident ensures that the complaint and complainant will be taken seriously while ensuring appropriate measures are in place to maintain confidentiality.
- ICC (Internal Complaints Committee): A dedicated committee is in place to receive and investigate sexual harassment matters. A complainant can approach any member of the committee with her/his written complaint.

Grievance Redressal Mechanism:

Upon receiving a complaint, the accused is informed, and resolution proceeds through conciliation or formal inquiry. A 90-day period is allocated for completion of the investigation, with the complainant and accused informed of the outcome. Disciplinary action, including transfer, withholding promotion, suspension, or dismissal, is taken based on the committee's findings.

Disciplinary Action:

- Disciplinary action is taken against the accused if misconduct is found.
- If a false complaint is maliciously made, disciplinary action is taken against the complainant.
- Protection is provided to the complainant, witnesses, or anyone providing information against any form of retaliation.
- The policy is disseminated to all members, and acknowledgment of understanding and compliance is required.

Trident Group maintains a zero-tolerance policy against sexual harassment, ensuring a safe and respectful workplace for all members. All members shall strive to help create a work environment free of hostility and harassment.

Details regarding prevention of sexual harassment are outlined in Trident's independent policy titled "Prevention of Sexual Harassment Policy" and this part of the policy must be read in conjunction with the same.

• **Dignity and Respect:**

At Trident Group, we ardently uphold the principles of Dignity and Respect as fundamental pillars of our Code of Conduct. Our steadfast commitment to nurturing a workplace culture that places a premium on the intrinsic worth and individuality of each member remains unwavering. We understand that treating every person with dignity involves recognizing their inherent value and unique qualities. Meanwhile, our dedication to respect underscores our commitment to acknowledging and appreciating diverse perspectives, experiences, and backgrounds.

This dedication permeates our daily interactions, informs our company policies, and shapes our business practices. We insist on cultivating an environment where every member, regardless of their role or position, feels not only recognized but also valued. Our commitment extends beyond the prevention of discrimination and harassment; we actively strive to foster an inclusive atmosphere where everyone experiences consideration and courtesy.

Every individual associated with Trident Group, whether a member, manager, or stakeholder, is expected to contribute to maintaining a culture characterized by mutual respect and dignity. We firmly believe that cultivating such a culture not only enhances the well-being of our workforce but also serves as a cornerstone for the overall success and enduring sustainability of our organization.

- **Anti-Intoxication**

Trident Group diligently incorporates the principles and obligations outlined in this Ethical Sourcing Code of Conduct into our operational framework. We expect all suppliers and vendors engaged in business with us to uphold this Code, ensuring high ethical, environmental, and social responsibility standards in their business practices.

At Trident Group, we understand that the dedication and allegiance of our members are linked to the quality of their work life. Recognizing the adverse effects of indiscriminate use of substances such as alcohol, Jarda, beedi, etc., and other drugs on individuals, their families, and the community, we acknowledge that the misuse of these psychoactive substances poses significant health and safety risks. Members are prohibited from inappropriate consumption of alcohol and use of illegal drugs in the workplace or while representing the Company outside the workplace.

Trident Group adopts a ZERO-tolerance policy concerning any member found consuming such substances while on duty. Stringent actions will be taken in accordance with the company's certified standing orders for the violation of these conditions.

The members are expected not to -

- Purchase, possess, use, consume, sell, distribute or store any alcoholic beverage, tobacco, beedi, jarda or any illegal drugs at all operations sites of Trident.
- Consume alcohol or any unlawful drugs in the workplace during work time or during a period prior to work where they may still be under the influence of such substances and may carry over to the working hours.
- Report any violation, if observed to relevant authorities.

Any person found under the influence of such substances during work shall be sent home immediately & disciplinary action will be initiated against the person in accordance with law

Details regarding anti-intoxication are outlined in Trident's independent policy titled "Anti Intoxication Policy" and this part of the policy must be read in conjunction with the same.

- **Environment, Health and Safety:**

At Trident Group, our steadfast commitment is to foster and uphold a secure and health-conscious workplace. Trident Group is dedicated to the establishment and sustenance of a workplace that prioritizes safety and well-being, offering a secure environment, appropriate equipment, and systematic work processes for all members by minimising the risk of accidents, injury and exposure to health risks. Members are expected to ensure strict adherence to established norms and full compliance with pertinent statutory regulations in this regard. The company proactively imparts information, delivers training sessions, and provides necessary supervision to facilitate these objectives.

Members are expected to:

- Acquaint themselves with all safety guidelines and meticulously adhere to them, as they are instrumental in sustaining a secure and healthy workplace.
- Participate in all required safety and health related training.
- Know the emergency procedures that apply at the workplace.
- Promptly intervene and report any observed unsafe situations or incidents to respective manager.

By collectively prioritizing and practicing these principles, we contribute to the creation of a workplace at Trident Group that not only meets regulatory standards but also promotes the well-being and security of every member.

Details regarding environment, health and safety are outlined in Trident's independent policy titled "Environment, Health and Safety Policy" and this part of the policy must be read in conjunction with the same.

- **Communication and Public Relations:**

Our relationship with the media and the wider public is highly valued, and we are dedicated to openly and promptly sharing all pertinent information and occurrences. Effective communication with the media is crucial for shaping the long-term public perception of Trident Group, especially in crisis situations, to maintain ongoing public support. Successful media relations play a vital role in informing the public about our contributions, accomplishments, significant events, and elevating the overall visibility of Trident Group. It is imperative to convey accurate information regarding incidents and contentious issues.

- **Media Interactions**

Unless expressly authorized, members are not expected to directly engage with the media. In unavoidable circumstances, it is advisable to refrain from expressing personal views, opinions, or speculations, and from providing information beyond one's direct knowledge and responsibility. Discussions on matters such as policy, legislation, personnel actions, or official investigations should be avoided unless specifically authorized. To ensure proper communication coordination, any media queries should be promptly reported to manager/ BHR. In cases of substantial public interest or sensitivity, simultaneous notification to the Corporate Communications Department is mandatory.

- **Social Media Platforms**

All members' views and opinions are personal and are not to be affiliated with Trident's business interests in any way, unless previously authorized by Trident. This extends to all forms of social media, encompassing platforms like Facebook, newspaper articles, Twitter, blogs, and mobile communication systems such as SMS and WhatsApp. Specific recommendations include directing media inquiries to the Company Spokesperson or Corporate Communications, refraining from making commitments to the media, and focusing on non-business topics in informal or social settings.

- **Interaction with Competitors' Members**

Precautions should be taken to avoid inadvertent disclosure of confidential or privileged information to competitors. Business-related communication with competitors' members requires prior approval from the respective Business Head. Competitors' members should not be allowed on company premises without the concerned Business Head's permission.

- **No Double Employment:**

At Trident Group, we uphold the principle of no double employment to ensure the undivided commitment of our members to their roles within the company. Members are expressly prohibited from engaging in simultaneous employment with any other organization or business entity during their tenure with Trident Group. This commitment extends to all members including contractual members, or any other form of employment that may compromise the dedicated and focused contribution of members to their responsibilities at Trident Group.

This policy is in place to safeguard the integrity of our workforce, prevent conflicts of interest, and uphold the quality and efficiency of the services provided by members. Violation of this policy may result in disciplinary action, including termination of employment. Trident Group values the

undivided attention and loyalty of its members, ensuring a work environment that prioritizes excellence, commitment, and integrity.

- **Freedom of Association:**

We recognize that freedom of association is a fundamental right that empowers individuals to join or form associations, unions, or organizations to protect their collective interests. Trident Group respects workers right to collectively bargain through various committees in place and are free to elect their representative. Management of Trident Group will not initiate any action against the elected member or union. Issues raised on various forums will be respected and worked upon in positive way This right is safeguarded and respected at Trident Group, provided that such associations align with legal and ethical standards.

Details regarding freedom of association are outlined in Trident’s independent policy titled “Freedom of Association & Collective Bargaining ” and this part of the policy must be read in conjunction with the same.

- **Non-Solicitation:**

- **Non-Solicitation of Members**

To maintain a harmonious and loyal work environment, Trident Group strictly prohibits the solicitation of fellow members for alternative job opportunities or business ventures. Members are expected to refrain from directly or indirectly enticing, persuading, or encouraging colleagues to leave their employment with Trident Group for any reason. This commitment is essential for fostering trust, preserving team cohesion, and upholding the professionalism and integrity of our workforce.

- **Non-Solicitation of Customers**

Trident Group places paramount importance on the relationships built with its customers. To preserve these relationships and ensure fair business practices, members are prohibited from actively soliciting or enticing Trident Group's customers for alternative products, services, or business engagements during and after their tenure with the company. This commitment is integral to maintaining the trust, goodwill, and reputation that Trident Group has established with its clientele. Upholding these standards contributes to a positive and ethical work culture at Trident Group. Violation of these non-solicitation policies may result in disciplinary action, including potential termination of employment.

- **Use of Company Assets and Property:**

At Trident Group, we emphasize on responsible and ethical use of company assets and property to ensure their preservation and optimal utilization for business purposes. Members are expected to exercise prudence and diligence in their use of company resources, including physical assets, equipment, intellectual property, and proprietary information.

Company assets and property are to be used exclusively for business-related activities, and any personal use is strictly prohibited unless explicitly authorized. Unauthorized use, misappropriation, or removal of company assets for personal gain or external purposes is considered a breach of conduct.

Members are responsible for safeguarding company assets and property against loss, damage, or misuse. All equipment, documents, and other assets entrusted to members must be used in a manner that aligns with Trident Group's business objectives. Any concerns regarding the appropriate use or maintenance of company assets should be promptly reported to the relevant department or management.

Members are expected to maintain the integrity of Trident Group and ensure compliance with this policy. Violations of this policy may result in disciplinary action, up to and including termination of employment, depending on the severity of the breach.

By adhering to these principles, members contribute to the responsible and sustainable use of company assets, fostering an environment of trust, accountability, and respect at Trident Group.

The Company discourages its members from:

- Using company assets and time for personal work
- Using the company's name and assets for unauthorized /illegitimate activities

- **Dress Code Ethics:**

At Trident Group, we believe in maintaining a professional and respectful workplace environment, and our dress code is a reflection of this commitment. Members are expected to adhere to a dress code that aligns with the nature of our business and promotes a positive and cohesive image for our company.

Our dress code is designed to foster a sense of professionalism, enhance workplace morale, and ensure that our members present themselves in a manner that reflects positively on Trident Group. While specific dress code guidelines may vary based on departmental or role-specific requirements, all members are expected to dress in a manner that is neat, clean, and appropriate for their respective roles.

Members should familiarize themselves with the dress code policy and adhere to it diligently. Additionally, when representing Trident Group at external events or client meetings, members should ensure their attire is in line with professional standards.

It is essential to exercise good judgment and maintain a level of formality that is suitable for a business environment. Clothing that is overly casual, provocative, or inconsistent with the company's professional image is discouraged. Members are encouraged to consult their respective managers or the Human Resources department for clarification on any dress code-related queries.

By embracing dress code ethics, members contribute to creating a workplace that values professionalism, fosters team unity, and upholds the positive image of Trident Group. Violations of the dress code policy may result in appropriate corrective measures to maintain a standard of professionalism across the organization.

- **Environment, Social and Governance (ESG):**

At Trident Group, we are deeply committed to our social responsibility, emphasizing ethical practices and environmental awareness. Our dedication involves proactively identifying opportunities for shared value, where we can effectively address both social and environmental challenges while bolstering our competitive strengths. Underpinning this commitment is our focus on embodying goodness and environmental consciousness, emphasizing the importance of aligning our business practices with sustainable and socially responsible principles. Trident is deeply committed to emphasizing ethical practices and promoting environmental stewardship. Trident ensures that all communication regarding the Company's ESG priorities and strategies shall be regularly disseminated to all stakeholders, both internal and external.

We are committed to reducing our environmental impact by contributing to a greener environment, promoting financial inclusion and innovating products that enhance employability. To align with this

commitment, it is imperative for every member to familiarize themselves with relevant ESG initiatives of the environmental laws, regulations, and policies that pertain to their respective roles.

We prioritize three key areas within our social responsibility framework: enhancing employability, contributing to a greener environment, and innovating for products that benefit underserved communities or demonstrate environmental excellence. Furthermore, we encourage the proactive exploration of opportunities to incorporate conservation practices and other environmentally considerate initiatives within the workplace.

We emphasize the significance of robust corporate governance as a cornerstone for the financial well-being of Trident. Our particular focus lies in fostering an experienced, active, and engaged Board of Directors equipped with the skills to effectively oversee and guide management.

- **Individual Conduct:**

We encourage our members to take proactive initiatives, strive for continuous learning and improvement, and cultivate emotional and social awareness. As a member of the Trident Limited, it is expected to adhere to the following principles when engaging with colleagues, business partners, and other stakeholders:

- Capacity and capability building

Demonstrate a strong dedication to work, exhibiting a high level of energy and a proactive "can-do" attitude. Taking personal accountability for driving results is crucial.

- Personal development

Embrace humility, recognize the importance of sharing credit and be committed to personal development. Display a genuine desire to take on responsibilities and a proactive attitude towards learning and growth.

- Emotional and Social Awareness

Exercise sound judgment in challenging and ambiguous situations, showcasing maturity to learn from both successes and failures. Demonstrate the courage to reflect on experiences and take meaningful actions. Understand the intricacies of our company and its networks, with the ability to influence people and decisions effectively.

- **Fair Marketing Practices**

Trident's approach includes but is not limited to the following principles:

- Trident prohibits misleading, false, fraudulent, or marketing that is aimed at misrepresentation of a product.
- Trident is committed to being transparent with regard to labelling and promotion of its products.
- Trident will obtain all necessary approvals for the marketing of its products and will adhere to all relevant laws and regulations.

All members are required to adhere to these guidelines while making business decisions or collaborating on behalf of Trident.

- **Customers:**

At Trident Group, our commitment to ethical conduct extends to our interactions with customers. Upholding the highest standards of integrity, we prioritize transparency and fairness in all aspects of our business dealings.

- Products and Services

We are dedicated to delivering products and services that meet the highest quality standards. Our commitment is to provide accurate and transparent information about our offerings, ensuring that customers make informed decisions. We strive to continuously enhance the value and quality of our products and services.

- Export Controls and Trade Sanctions

In compliance with relevant laws and regulations, Trident Group is committed to respecting export controls and trade sanctions. We conduct our international business activities responsibly, ensuring that our products and services adhere to applicable export laws and do not violate trade sanctions imposed by regulatory authorities.

- Dealings with Customers

Our interactions with customers are guided by principles of honesty, integrity, and respect. Trident Group is dedicated to building and maintaining strong, trust-based relationships with our customers. We prioritize clear communication, fair treatment, and responsiveness to customer needs, fostering a positive and lasting partnership.

- **Fair Competition**

Members are expected to comply with antitrust and competition laws for all operations. It is suggested for members to not engage in agreements with competitors, customers or business partners that could limit or interfere with full and fair competition. Members are required to use only lawful, ethical and publicly available sources to gain information about the competitors.

- **Quality:**

At Trident Group, our unwavering commitment is to deliver exceptional products and services of the highest quality, aimed at exceeding the expectations of our valued customers. We continually seek innovative avenues to enhance our offerings. Trident Group is dedicated to customer satisfaction, both domestically and internationally, achieved through ongoing enhancements in quality, cost-effectiveness, and customer service. As a member, one is entrusted with the responsibility of aligning with the directives outlined in the Quality guidelines of Trident Group. It is imperative that subpar quality is neither tolerated nor permitted to proceed. Furthermore, member's are strongly urged to actively pursue continuous improvements within sphere of work and extend recommendations for enhancements across other areas whenever feasible.

Members are expected to:

- Adhere consistently to elevated standards of quality in all professional endeavors.
- Propose and champion changes that have the potential to elevate the quality of our offerings.
- By upholding these principles, we collectively contribute to the enduring legacy of excellence that defines Trident Group, ensuring our products and services consistently meet the highest standards in the industry.

- **Duty to Report:**

At Trident Group, our commitment to excellence extends to the conscientious fulfillment of our duty to report to work as scheduled. Each member plays a pivotal role in maintaining the efficiency and collaborative spirit that defines our workplace. In adherence to this commitment, members are expected to promptly notify their immediate supervisor or manager in the event of any circumstances preventing them from reporting to work as planned. Transparent communication regarding the reason for absence, expected duration, and any relevant follow-up information ensures the seamless functioning of our

operations. By upholding this duty, Trident Group creates a workplace culture rooted in responsibility, accountability, and the collective success of our team.

Attendance Rules:

- The attendance should be as per the roaster system.
- There shall be four shifts defined namely 24X7 Shift, Morning Shift, Evening Shift and Night Shift.
- Members coming in Shift Morning, Evening & Night shall come for a duration of a minimum of 8:00 hours as defined in the system.
- Attendance shall be marked using an I-card issued to members on the date of joining.
- In case of member is absent for a minimum 10 days continuously, the salary code of the member will be deactivated in the SuccessFactors system.
- Reactivation can be done within a month of deactivation. Same shall only be done with the approval of MD/ CEO/ CHRO.
- The attendance system should be fully IT enabled.

• **Violation of the Code of Conduct:**

The Code of Conduct is readily accessible, and it is imperative for all Trident members to acquaint themselves thoroughly with its contents. Strict adherence to the outlined principles in the Code of Conduct is expected from every member. Recognizing that the Code may not cover every possible situation that may arise in the course of daily business, exercising common sense and sound judgment in applying these principles is advised. In situations of uncertainty or for clarification, seek guidance from Business Head or the HR Head.

Violation of any clause in the Code of Conduct may result in severe disciplinary action, including possible termination of employment and any actions permitted by the law. In instances of breaching confidentiality clauses, the individual may be held accountable for damages, including actual damages and lost profits suffered by the company. Such breaches may also lead to termination of employment without notice, with the company having the right to adjust or recover damages from any dues payable.

Sanctions for non-compliance:

- Members who violate these policies and procedures or any applicable federal or state privacy law or regulations will be subject to disciplinary action, up to and including termination of employment, in accordance with Trident's Human Resources Policies.
- These sanctions also apply to members who are accomplices and fail to report a known violation.
- Any attempt to prevent or dissuade other members in their efforts to report a suspected security problem or violation is strictly prohibited and shall be cause for disciplinary action.
- Any form of retaliation against an individual reporting or investigation security incidents or violations is also prohibited and shall be cause for disciplinary action.

Each Trident member bears the responsibility of contributing to the reputation and upkeep of our company. It is our duty to take ownership of our choices and actions and to speak up and take necessary action if someone else is not aligned with our Business Principles. Reporting any breach is essential, and should be reported such instances directly to the Business Head. If the matter involves a senior member, in that event to bring it to the attention of the MD/ of Trident Limited. The company is committed to safeguarding members who make genuine complaints, and efforts will be made to protect them from any retaliatory actions.

Members are expected to:

- Thoroughly familiarize one with the Code of Conduct and take accountability for actions.
- Cooperate fully with investigations of potential violations.
- Report any misconduct or deviation from the Code of Conduct to the Business Head or the Chairman.
- Stay up-to-date on all training and education requirements in order to maintain compliance with all applicable laws, regulations, and internal policies.

Management reserves the right to prosecute violators to the fullest extent of the law.

V. Training and Awareness: Members are to be informed of the provisions of the Code at the time of orientation. Members are expected to stay up-to-date with any amendments or additions that are made to the Code.

VI. Grievance Redressal:

- Under this Code, members are entitled to bring forward concerns about unacceptable practices without notifying their superior. These protected actions include:
 - Reporting, in good faith, any belief of misusing organizational funds.
 - Reporting, in good faith, the violation or suspected violation of laws, rules, or regulations.
 - Participating in or providing information for investigations, hearings, court proceedings, legislative inquiries, or other administrative reviews.
 - Objecting or refusing to comply with a directive that, in good faith, member believe may violate a law, rule, or regulation.

- Filing a Complaint:

Should any member have a genuine complaint or concern about fraud, violations of laws, rules, or regulations, or any unacceptable, improper, or unethical practices, may raise it with superior, the Whistleblowing Officer, or the Audit Committee.

- Protection and Safeguarding of Interests:

The organization is strictly prohibited from taking any adverse action against member for exercising the rights, including:

- Discharging
- Threatening
- Discriminating against the employment

The Vigil Mechanism and Whistleblower Policy applies to all Trident Group members, designed to empower to raise concerns about any unacceptable, improper, or unethical practices within the organization discreetly, without obligatory disclosure to your immediate superior. Your protection is guaranteed against any adverse action or discrimination, provided the reporting is justified and made in good faith.

All details related to the channels of filing a complaint and procedure of investigating the complaint is enumerated in the Vigil Mechanism and Whistleblower Policy and this section must be read in conjunction with the same.

VII. Exception

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

VIII. Governance

- The roles and responsibilities of various accountable positions have been included below:
 - **Member** - to comply with this policy, applicable laws & regulations in letter and spirit. Adherence and compliance are mandatorily required whenever a member is representing the company.
 - **Manager & Supervisor** - to comply with this policy, applicable laws & regulations in letter and spirit. Adherence and compliance are mandatorily required whenever a member is representing the company. It is the role and responsibility of the manager to communicate ethics and compliance with policies and the law with the team members. The manager is expected to listen and respond fairly to member concerns and take reasonable steps to resolve issues highlighted/identified to/by them, inform HR and maintain confidentiality.
 - **Human Resources** - to comply with this policy, applicable laws & regulations in letter and spirit. Adherence and compliance are mandatorily required whenever a member is representing the company. To advise, address grievances, resolve issues highlighted/identified to/by HR and maintain confidentiality.

- **Handling Complaints, Disciplinary Measures & Remediation Plan**

Trident Group forbids retaliation against anyone for reporting discrimination, registering a complaint pursuant to this policy, assisting in making such a complaint, participating in an investigation, filing a charge of discrimination, or otherwise pursuing his/her rights under applicable law. Anyone experiencing or witnessing any conduct and believes to be discriminatory, harassing, or retaliatory should immediately report it to their manager, a member of management, a Human Resources representative, or may raise concern, anonymously as they wish. Managers, supervisors, and HR will support members reporting harassment, bullying, or discrimination, ensuring proper investigation. Both parties will have an opportunity to present their case, and decisions will be made by HR or authorized senior members with confidentiality assured. False allegations may be considered a disciplinary offense or matter will be reported to the PanchSabha & KAAN etc.

- **Member Assistance Program**

Members facing harassment, bullying, or discrimination can approach their respective BHR or CPO by reporting the case verbally/ in writing, who can provide guidance, suggest resolution strategies, and advise on the grievance procedure. Any aggrieved person or otherwise can also register their complaints as per company complaint/grievance redressal policy. Members can also look at Initiatives as 'PanchSabha' which provide a platform to share their concerns

Audit Committee:

As an alternative, one can directly communicate the complaints to the members of the Audit Committee, bypassing the Whistleblowing Officer.

Compliance with this Policy is subject to audit and monitoring as warranted. Trident members who violate these policies and procedures or any applicable federal or state law or regulations may be subject to disciplinary action, up to and including termination of employment in accordance with Trident’s policies.

Responsibility Matrix

1	Implementation/Execution	Business HR
2	Monitoring	Corporate HR
3	Auditing	Risk Committee /Legal / Group Head HR& IR/ CHRO
4	Ownership	Compliance Team & 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.

Every member will adhere all by laws/ statutes applicable to the company and will also to adhere the employment contract and other various contracts entered with him at the time of his appointment and otherwise. Violation in adherence to these will subject to legal action.

Employer Rights:

- The employer reserves the right to enforce strict adherence to the Code of Conduct by all members, including contractual personnel, to maintain a culture of professionalism and integrity within and outside the organization.
- The employer retains the right to subject the Code of Conduct to periodic reviews, ensuring its ongoing relevance and effectiveness in guiding members' conduct, ethics, and compliance in all business dealings.
- The employer has the authority to take severe disciplinary action, including possible termination of employment, against any member found in violation of the Code of Conduct, with the right to adjust or recover damages from any dues payable.
- The employer reserves the right to prosecute violators of the Code of Conduct to the fullest extent of the law, emphasizing the seriousness of maintaining ethical standards within the organization.
- The employer reserves the right to take legal action against members who attempt to prevent or dissuade others from reporting suspected security problems or violations, emphasizing the importance of a transparent reporting culture.
- The employer has the authority to investigate and take disciplinary action against members who engage in any form of retaliation against individuals reporting or investigating security incidents or violations, reinforcing a zero-tolerance policy for retaliation.
- The employer reserves the right to terminate the employment of any member, including accomplices, who fails to report a known violation, underlining the collective responsibility to uphold ethical standards within the company.

- The employer asserts the right to hold individuals accountable for damages, including actual damages and lost profits, in instances of breaching confidentiality clauses outlined in the Code of Conduct.
- The employer reserves the right to communicate and enforce the Code of Conduct through various accountable positions, including members, managers/supervisors, and human resources, emphasizing the shared responsibility for compliance and adherence.
- The employer maintains the right to conduct audits and monitoring to ensure compliance with the Code of Conduct, with violations subject to disciplinary action, including termination of employment, in accordance with company policies.
- The employer has the authority to provide protection to members who make genuine complaints, ensuring safeguards against retaliatory actions, as outlined in the Vigil Mechanism and Whistleblower Policy.

Employer Duties:

- The employer is obligated to ensure that the Code of Conduct is effectively communicated to all members, including contractual personnel, during the orientation process, highlighting the importance of ethical standards and compliance with laws and regulations.
- The employer has a duty to keep the Code of Conduct updated and relevant, conducting periodic reviews to address emerging issues and uphold a culture of integrity both within and outside the organization.
- The employer is committed to providing a fair and transparent process for handling complaints and grievances, with a responsibility to address concerns about unacceptable practices raised by members without notifying their superiors, ensuring protection against adverse actions.
- The employer is duty-bound to establish a Vigil Mechanism and Whistleblower Policy, empowering members to raise concerns about unethical practices discreetly, with guaranteed protection against adverse actions or discrimination for reporting justified concerns in good faith.
- The employer has a responsibility to define and communicate the roles and responsibilities of various accountable positions, including members, managers/supervisors, and human resources, in ensuring compliance with the Code of Conduct.
- The employer is obligated to handle complaints, disciplinary measures, and remediation plans with fairness and confidentiality, ensuring that both parties involved have an opportunity to present their case and decisions are made by authorized senior members or HR.
- The employer has a duty to prevent retaliation against members for reporting discrimination, registering complaints, or assisting in investigations, emphasizing a commitment to protecting members who exercise their rights under applicable laws.
- The employer is responsible for providing support and assistance to members facing harassment, bullying, or discrimination, with a designated process for reporting cases to respective Business HR or Chief People Officer, ensuring guidance, resolution strategies, and adherence to grievance procedures.
- The employer is obligated to establish and communicate the channels for filing complaints, including the option to directly communicate complaints to the Audit Committee, reinforcing a commitment to addressing concerns at multiple levels within the organization.
- The employer has a duty to conduct audits and monitoring to ensure compliance with the Code of Conduct, with a commitment to taking appropriate disciplinary action, including termination of employment, for members found in violation of policies and procedures.
- The employer is responsible for providing training and awareness programs to members, ensuring that they are informed of the provisions of the Code of Conduct at the time of orientation and staying updated on any amendments or additions made to the Code.
- The employer has a duty to promote a transparent reporting culture, encouraging members to report any breach of the Code of Conduct directly to their Business Head, Chairman, or Chief HR Officer, with a commitment to safeguarding genuine complainants from retaliatory actions.

Member Rights:

- The employer recognizes the right of every member, including contractual personnel, to be thoroughly acquainted with the Code of Conduct and to expect clear communication about the ethical standards and expectations outlined by the organization.
- Members have the right to work within an environment that upholds the highest ethical standards and fosters a culture of professionalism and integrity, both within and outside the organization, as outlined in this Code of Conduct.
- Every member is entitled to a fair and transparent process for handling complaints and grievances, with the right to bring forward concerns about unacceptable practices without notifying their superiors, ensuring protection against adverse actions.
- Members have the right to participate in a Vigil Mechanism and Whistleblower Policy, allowing them to raise concerns about unethical practices discreetly, with guaranteed protection against adverse actions or discrimination for reporting justified concerns in good faith.
- Members possess the right to be informed about their roles and responsibilities within the organization, as well as the roles of managers/supervisors and human resources, in ensuring compliance with the Code of Conduct.
- Every member is entitled to fair treatment during the handling of complaints, disciplinary measures, and remediation plans, with the right to present their case and decisions made by authorized senior members or HR with confidentiality assured.
- Members have the right to protection against retaliation for reporting discrimination, registering complaints, or assisting in investigations, emphasizing the commitment of the employer to safeguarding members who exercise their rights under applicable laws.
- Members hold the right to receive support and assistance in cases of harassment, bullying, or discrimination, with a designated process for reporting cases to respective Business HR or Chief People Officer, ensuring guidance, resolution strategies, and adherence to grievance procedures.
- Members possess the right to utilize established channels for filing complaints, including the option to directly communicate complaints to the Audit Committee, reinforcing a commitment to addressing concerns at multiple levels within the organization.
- Members have the right to a workplace that adheres to the Code of Conduct, with the organization conducting audits and monitoring to ensure compliance, and with a commitment to taking appropriate disciplinary action, including termination of employment, for members found in violation of policies and procedures.
- Every member has the right to a transparent reporting culture, with encouragement to report any breach of the Code of Conduct directly to their Business Head, Chairman, or Chief HR Officer, and with a commitment to safeguarding genuine complainants from retaliatory actions.
- Members are entitled to receive training and awareness programs on the provisions of the Code of Conduct at the time of orientation, and the right to stay informed about any amendments or additions made to the Code.

Member Duties:

- Members are duty-bound to actively familiarize themselves with the Code of Conduct and take personal accountability for their actions, ensuring strict adherence to the outlined principles within the organization.
- It is the responsibility of members to cooperate fully with investigations of potential violations, providing truthful and relevant information to assist in maintaining the integrity of the workplace.
- Members have a duty to report any misconduct or deviation from the Code of Conduct to their Business Head or the Chairman, contributing to a proactive approach in upholding ethical standards within the organization.
- In the event of uncertainty or the need for clarification, members are responsible for seeking guidance from their Business Head or the Corporate HR Head, exercising common sense and

sound judgment in applying ethical principles.

- Members are expected to stay up-to-date on all training and education requirements, ensuring ongoing compliance with applicable laws, regulations, and internal policies.
- In the interest of promoting a transparent and inclusive work culture, members are duty-bound to contribute to the reputation and upkeep of the company, taking ownership of their choices and actions.
- Members have a duty to protect the confidentiality of company data, respecting intellectual property rights, and ensuring the secure handling of sensitive information in line with the Code of Conduct.
- Members are obligated to report any breach of the Code of Conduct directly to their Business Head or the Chairman, promoting a culture of accountability and ethical responsibility within the organization.
- It is the duty of each member to contribute to the overall well-being of the workplace by actively participating in initiatives such as 'PanchSabha,' providing a platform to share concerns and foster a collaborative environment.

For Trident Limited

Authorized Signatory