

Guidelines / Policy	Business Area	Environmental, Social and Governance (ESG)
	Title	Environmental Sustainability Policy
	Version	01
	Issue Date	11.09.2024

Document History				
Version	Date of Issue	Author	Brief Description of Change	Reviewed By
1	11.09.2024	ESG	New Policy Implementation	Group CEO

I. Introduction to the Policy

Trident Group embraces sustainability as a core business vertical paving the way to protect the environment, conserve energy and natural resources ensuring a long-term value creation for stakeholders.

This policy is a comprehensive framework for seamlessly integrating EMS (Environment Management System) through overarching objectives, strategy and targets, decision-making processes, development of process and products, and interactions with key stakeholders.

II. Applicability

This policy is applicable to all sites of the trident group. We encourage all our subsidiaries, entire value chain, consultants, contractors, vendors, service providers, suppliers, business partners, or those associated with us in any other capacity, directly or indirectly to adopt this policy.

III. Policy Objective

At Trident, we are committed to protecting the environment across our business operations. Our goal is to achieve this by ensuring the relevance and understanding of our environmental objectives. We are dedicated to executing

initiatives that consistently enhance and refine our existing practices, ensuring that our environmental impact remains among the industry's best.

Our main objectives and commitment are to:

- We shall align with the requirements of ISO 14001:2015 and fully comply with all applicable legal and regulatory standards, including environmental clearances, consents, permits, and licenses.
- We shall employ systems and procedures that ensure adherence to relevant national, regional, and local environmental regulations and legal obligations. In the absence of appropriate legislation, utilize industry best practices and relevant international standards.
- We shall strive for continual improvement in our environmental performance through developing, implementing, and enhancing environmental management systems in accordance with global standards and systematically manage environmental performance of operating activities
- We shall regularly evaluate environmental aspects/risks, manage impacts by employing appropriate control mechanisms and communicating the environmental strategy to stakeholders.
- We shall establish objectives and targets to prevent, diminish, or mitigate environmental impacts on both people and the planet and periodically review performance against established objectives and targets to ensure effective environmental management
- We shall manage impacts related to energy, carbon emissions, water, wastewater, waste (hazardous and non-hazardous), air emissions and chemical management system
- We shall conserve natural resources by adopting environmentally friendly and energy-efficient technologies through process enhancements. Continually integrate advancements into our operations, leveraging new technologies and embracing eco-friendly practices.
- We shall raise awareness among internal and external stakeholders, including business partners, suppliers, and others, encouraging the adoption of practices aligned with policies to collectively manage environmental impacts.
- Promoting a sustainable approach to business, by assessing our purchasing requirements viz. buy recycled materials, reduce waste, use less harmful chemicals
- We shall conduct environmental due diligence during mergers and acquisitions.
- We shall provide appropriate training to all employees, emphasizing the importance of minimizing environmental risks and understanding the impacts of their work activities on the environment.
- Adhering to transparency and accountability, regularly monitoring and reporting progress on measurable targets for environmental objectives to all stakeholders

Our environmental focus areas are as follows:

- **Energy Management**
 - We shall Implement tangible measures to reduce energy consumption and greenhouse gas emissions by adopting renewable energy sources and energy-efficient technologies.

- We shall work towards optimizing energy usage by minimizing losses and maximizing waste energy recovery.
- We shall conduct regular energy audits through both in-house and external teams to identify and implement improvements.
- We shall work towards reducing our carbon footprint by improving energy efficiency and integrating renewable energy solution into our operations.

- **Water Management**
 - We shall strive to achieve water-neutrality.
 - We shall continually work towards harvesting rainwater and adopting practices such as recycling, reusing, and reducing water consumption to minimize freshwater usage in operations.
 - We shall conduct regular water risk assessment to identify excessive water consumption and/or water wastage, encourage optimization of water use and create water balance.
 - We shall comply with the Zero Discharge of Hazardous Chemicals' (ZDHC) progressive level wastewater standard
 - We shall encourage suppliers with significant water-related impacts to practice water conservation.

- **Waste Management**
 - We shall adhere to the provisions of the Hazardous and other Wastes (Management and Transboundary Movement) Rule, 2016 and any subsequent amendments.
 - We shall ensure the implementation of 5 R's practice- Reduce, Reuse, Recycle, Re-engineer, Redesign, to enable and implement a sustainable and circular approach in all our operations.
 - We shall work towards implementing zero waste to landfill by setting measurable goals and establishing targets for recycling, waste reduction, and diversion from landfills.
 - We shall work towards incorporating circular economy by adopting technologies and waste management systems to reduce waste and optimize resources.
 - We shall work towards engaging with suppliers to ensure they have sound waste reduction and waste management criteria.

- **E-Waste Management: -**
 - We shall ensure that all electronic waste generated during our operation is managed according to E-Waste (Management) Rule 2016.

- **Bio Medical waste Management: -**
 - We shall ensure that bio-medical waste generated from our facilities is segregated at the source and managed in accordance with Bio Medical waste management rule 2016.

- **Noise pollution management: -**
 - We shall monitor and control noise levels across our operations to ensure compliance framed under Noise Pollution (Regulation and Control) Rule 2000.

- **Chemical Management**
 - We shall continually work towards elimination of hazardous chemicals which adversely impact human and environmental health across our products.
 - We shall work towards maintaining a Restricted Substance list (RSL) of hazardous chemicals that should not be used in the manufacturing process and the business practices.
 - We shall maintain ZDHC MRSL and MSDS Compliances for all chemicals that are used in the manufacturing process.
 - We shall strive towards not to use substances mentioned in EU SVHC (Substances of Very High Concern) list in the manufacturing of our products.
 - We shall focus on incorporating safe storage of chemicals, maintaining transparency and traceability of chemical substances used in production to chemical inventory.

- **Air Emission Management**
 - We shall work towards ensuring protection of air quality by working towards reducing emissions from the operations.
 - We shall Monitor and analyze stack emissions regularly.

- **Radiation Management**
 - We shall comply with all the rules of radiation protection rules 2004 towards protection of our employees, flora & fauna

- **Packaging**
 - We shall comply with EPR Regulations for Packaging Plastic Framed under Plastic waste management rules, 2016 & amendments.

IV. Training and awareness

- We shall inform all the employees about the contents of this Policy during orientation, through induction manuals, through intranet, training events and by being displayed prominently throughout the organization.
- We shall conduct regular training sessions on this policy through online, in-person, or through a hybrid approach
- For comprehensive information on training programs and skill development, please refer to Trident's separate policy document titled "Capacity and Capability Policy." It is essential to read and understand this policy in conjunction with the training provisions.

V. Governance

The senior management at Trident is committed to providing the structure and resources to maintain the EMS (Environment Management System) framework for providing a safe and environmentally friendly workplace. The nominated Environmental lead shall review the Policy in consultation with relevant people annually, or sooner when deemed necessary.

Responsibility Matrix

1	Implementation/Execution	Environmental Sustainability Head
2	Monitoring	Business CEO & Chief of ESG
3	Auditing	Audit Committee
4	Ownership	Group CEO

Disclaimer: - This Document is to the confidential property of the Trident Limited and shall not be reproduced, copied, disclosed to others, or used otherwise without the prior written permission of Trident Limited.

For Trident Limited

**Deepak Nanda
(Managing Director)**