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| <i>Guideline /Policy</i> | Title | Equal Opportunity & Fair Treatment Policy |
| | Version | V3 |
| | Issue Date | 01/01/2022 |
| | Revision Date | 26/07/2024 |
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| Document History |
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| Version | Date of Amendment | Author | Brief Description of Change | Reviewed By |
|---------|-------------------|--------|--|-------------------------------------|
| 1 | 01/01/2022 | SHR | Introduction of policy | Business IR |
| 2 | 26/02/2024 | SHR | Annual Revision and Addition of Employer and Members Rights & Duties | Process Owners & Knowledge Partners |
| 3 | 26/07/2024 | SHR | Review of Policy | Process Owner |

I. Introduction

Trident Limited has always been committed to being an Equal Opportunity & Fair Treatment organization. The same is reinforced by our Company policies, Business principles and practice. Trident Limited embraces diversity respects the dignity of all its members and is committed to ensuring that the workplace is free from any form of discrimination and harassment. Trident Limited believes in capitalizing on what is unique about individuals and believe in drawing on their different perspectives and experience which adds value.

Trident Limited ensures that as per The International Labour Organization (ILO) Convention No. 111 is titled the "Discrimination (Employment and Occupation) Convention, 1958, equal employment opportunity to be given to all members and has been strictly communicated amongst all members, business partners, stakeholders associated with us directly or indirectly that discrimination on basis of gender, sexual orientation, skin color, caste, creed, tribe, origin, nationality, religion, political opinion, race, age, disability, HIV/ AIDS Status, pregnancy/ maternity status, marital status, medical condition, family responsibility, age, etc. shall not be accepted in any form. There is zero tolerance for any form of harassment (mental, physical/verbal).

Pursuant to the "The Rights of Persons with Disabilities Act, 2016", Trident has a vision of creating an inclusive workplace where people with disability get an equitable treatment in an environment free from discrimination or harassment.

Further, by incorporating the provisions of the "Equal Remuneration Act. 1976" into this policy, we reaffirm our commitment to eliminating gender-based wage disparities and fostering an environment where all employees, regardless of gender, are compensated fairly for their contributions. This reflects the company's dedication to creating a workplace characterized by equity, diversity, and inclusivity, where each employee is recognized and rewarded without regard to gender.

This Equal Opportunity & Fair Treatment Policy ("this Policy") is consistently applied throughout the period of employment of the individual right from the recruitment process till superannuation.

In every instance throughout this policy, the terms "This Company," "The Company," "Company," and "Trident" signify "Trident Limited" and shall include all its manufacturing units, corporate and administrative offices located in India and abroad.

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

This policy is applicable to all the individuals working at all levels and cadres (whether permanent, fixed-term, temporary and contractual), directors, retainers, consultants, contractors, trainees, casual workers, vendors, service providers, suppliers, business partners or those associated with us or any of our subsidiaries/associates in any other capacity, directly or indirectly.

III. Key Definitions

- **Manager/Supervisor** shall mean and include any such person responsible for the affairs of the company at that particular location or site or any person to whom such affected person reports or is directly responsible for such person.
- **Equal Opportunity** is a state of fairness in which job applicants/members are treated similarly, unhampered by artificial barriers or prejudices or preferences, except when distinctions can be explicitly justified.
- **Fair Treatment** means that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.
- **Bullying** refers to persistent or repeated unwanted criticism, threats, abuse or insults – behaviour or written messages (publicly or privately) which humiliates or effects the dignity of an individual.
- **Harassment** 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.

IV. Policy

The policy covers crucial aspects of an inclusive culture at Trident and lays down a framework to adhere to in case an individual experiences any type of discrimination or harassment at workplace. It is the responsibility of each member of Trident to recognize these policies and cooperate with their implementation. Any information shared by the members with regards to their disability/medical condition /gender/orientation/religion/caste status shall be kept strictly confidential and not be disclosed without prior consent of the person.

This Policy applies to all aspects of the relationship between Organization and its members, including:

- Recruitment;
- Employment;
- Promotion;
- Training;

- Working conditions;
- Wages and salary administration; and
- Associate benefits and application of policies.

Violation of this policy may result in disciplinary action, up to and including termination of employment or engagement. We strive to ensure that our workforce is representative of all sections of society. In case of any non-compliance with the policy, disciplinary action shall be taken as per Disciplinary policy. In case any such incident has been reported, the same should appear in the record and shall be published physically & digitally.

Recruitment and Selection - Employment with Trident Limited will be based on merit and not on any irrelevant attribute or characteristics that an individual may possess. To facilitate increase representation of diverse workforce (People with disabilities (PwD), LGBTQ+ etc), focused intervention shall be undertaken towards sourcing and hiring to reach out to the diverse talent pool. Trident shall include a statement on the equal opportunity policy inviting candidates from diverse background to apply. Application forms will be gender neutral and available in alternate formats based on request from PWD candidates. The company aims to ensure that no applicant receives less favorable treatment on any grounds. Upon successful hiring, the candidate will be kept on probation for 6 months.

Promotion & Growth - Promotion & Growth level will be based on performance & achievement of KPIs or any other measure of performance as the company may deem fit as defined from time to time. At Trident, we encourage members from diverse workforce to apply for suitable positions. We adhere to an inclusive evaluation process by ensuring that all the candidates are provided with facilities to facilitate the process of evaluation.

Learning & Development - Learning & Development will be based on performance, ability and potential and will be in tandem with the needs of the business. All members are entitled to equal access to training and development opportunities. Individual training needs are reviewed and discussed during quarterly performance reviews. Supervisors and HODs are responsible for ensuring quality of access to training and development opportunities.

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

Fair Remuneration - Trident is committed to providing fair remuneration to the members and workers, and does not discriminate based on gender, sexual orientation, color, caste, creed, tribe, origin, nationality, religion, race, age, disability, medical condition. We follow an equal pay for equal work approach to maintain fair remuneration.

Working Conditions - To ensure good working conditions, and to prevent fatal injuries from occurring, site-specific safety committees that aid in the preparation of On-site emergency plans, conducting of regular mock drill and evacuation program are formulated. The Company shall consider its obligation to ensure for all its members, consultants, contractors, and customers a safe and healthy environment free from occupational injury & diseases.

Physical Infrastructure - The physical infrastructure is designed to adhere to the accessibility standards as prescribed by the Government of India. In its commitment of creating an inclusive culture for the people with a disability, Trident is continuously working towards modifying its existing infrastructure to cater to their needs and requirements.

Member Engagement - Trident shall ensure that all social events, engagement activities and work meetings are inclusive and are conducted at accessible venues and reasonable accommodation will be made available to PWD members.

Termination or Resignation - In any such event Trident will be responsible for providing remuneration to the member based on the number of days worked post in the full & final settlement conforming to the legal requirements prescribed by the law. Trident shall ensure that decisions regarding disciplinary action termination, retrenchment or retirement should not be on grounds of race, skin color, sex (gender), religion, political opinion, national extraction, social origin, disability, HIV/AIDS status, sexual orientation, pregnancy/maternity status, marital status, family responsibilities, age or nationality/foreign worker.

False Allegations

Upon the conclusion of an inquiry, if the Governance Group at Trident Limited concludes that the aggrieved individual falsely or maliciously accused the alleged perpetrator of Workplace Discrimination and/or Harassment, then such a person shall be subject to appropriate disciplinary action.

Member Assistance Program

If the member feels that they have been harassed, bullied or discriminated against, they may directly approach their respective Business IR/ Chief of IR. Business IR/ Chief of IR would help by :-

- Suggest ways on how to deal with the complaint
- Help to resolve the same informally (in case of communication gap)
- Advise on the Grievance procedure

Handling Complaints, Disciplinary Measures & Remediation Plan

Managers and supervisors in coordination with HR will support any member who complains about harassment, bullying or discrimination at workplace. HR will make sure that proper investigation take place. Member may choose any of the existing mechanisms to lodge a complaint.

Both parties would be given a chance to present their case. Post understanding the case and investigation report, decision to be taken by HR or Senior member authorised for this cause.

The same is to be dealt with utmost confidentiality and the complainant must be assured that he/she shall not be discriminated against. False allegations, breach of this policy may however be considered as a misconduct and will warrant disciplinary action.

V. Procedure

Grievance Handling

The company ensures that any disciplinary action taken is as a result of misconduct or poor performance and as such are based on pre-defined objective criteria. Disciplinary proceedings are carried out fairly in respect of those members to whom they apply. All grievances raised are dealt fair and just. Should member feel that he/she is being subjected to discrimination, harassment, bullying or victimization, he/she can raise the same with HR or use any of the existing grievance handling mechanisms.

All such complaints/ grievance will be taken seriously and treated with sensitivity and fairness. Appropriate action basis investigation will be taken in case members are found to breach this policy either through discrimination, harassment, bullying, or victimizing other members or by making false claim. To this effect, Trident has a grievance handling policy that should be read in conjunction with this part of the policy.

Separation

The company monitors separation process to ensure that the reason for separation is fair and just and is not directly or indirectly a result of discrimination. Exit interview is mandatory for all members

Retaliation

- Trident Limited is committed to refraining from any form of retaliation against an individual who reports Workplace Discrimination and/or Harassment. No person participating in inquiries to provide evidence or statements supporting a complaint against Workplace Discrimination and/or Harassment shall face unfavorable treatment or retaliatory behavior in their work conditions or employment circumstances. Specifically, no individual will experience threats, intimidation, termination, suspension, disciplinary actions, transfer, demotion, promotion refusal, obstruction of work responsibilities, or any other negative treatment due to raising a complaint or participating in an inquiry.
- Retaliation is expressly recognized as a violation of Trident Limited's Policy and is strictly prohibited.
- Any member found to have retaliated against another individual for filing a complaint or participating in an inquiry as a witness or reporting any act of Workplace Discrimination and/or Harassment, will be subject to the appropriate disciplinary action as determined by the Governance Group following Trident Limited's internal misconduct rules. Retaliation by a member of a current vendor or client of Trident Limited against a member for filing a complaint, participating in an inquiry as a witness, or reporting any act of Discrimination and/or Harassment will also be actionable.

VI. Non-Waiver of Statutory Rights

Trident Limited ensures that nothing within this Policy shall compromise any rights accessible to any members or individual, nor shall it hinder them from pursuing any legal recourse under applicable law concerning Workplace Discrimination and/or Harassment.

This Policy, implemented by Trident Limited, does not serve as a waiver of any statutory or common law rights belonging to Trident Limited or its members. Both parties, Trident Limited and its members, retain the liberty to exercise any of their legal rights as deemed necessary.

VII. Interpretation and Guidance

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

VIII. Training

To foster a workplace committed to equal opportunity and fair treatment, all members at our organization will participate in thorough training sessions focused on the Equal Opportunity and Fair Treatment Policy. This training aims to equip individuals with the knowledge and skills to uphold fairness, eliminate biases, and create an inclusive atmosphere where everyone has an equal chance to thrive. By engaging in this training, our members will contribute to cultivating a workplace that prioritizes equal opportunities and ensures fair treatment for all.

IX. Exception

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

X. Review Timelines

The policy may be reviewed in the month of January every year or as and when the company may deem fit.

XI. Governance

Responsibility Matrix

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| 1 | Implementation/Execution | TA Team, DE&I Team and HRBP |
| 2 | Monitoring | Corporate HR |
| 3 | Auditing | Group Head HR/ IR , Chief Risk Officer |
| 4 | Ownership | HR Team |

Employer Rights:

- The employer can take serious action against any form of policy violation, leading up to termination of member based on the severity of policy breach.
- The employer has the right to leverage diverse perspectives and experiences to enhance the company's value and innovation.
- The employer can reach out to diverse talent pool and facilitate increase in representation of diverse workforce (People with disabilities (PD), LGBTQ+ etc.)
- The employer can establish an inclusive workplace ensuring equitable treatment for individuals with disabilities or from minority groups, free from discrimination or harassment.

Employer Duties:

- The employer must embrace diversity and ensure the dignity of all members.
- The employer has to ensure that the workplace is free from any form of discrimination and harassment.
- The employer must ensure communication to all members, business partners, stakeholders associated with Trident, directly or indirectly, that discrimination on basis of gender, sexual orientation, color, caste, creed, tribe, origin, nationality, religion, race, age, disability, medical condition, age is not accepted in any form.
- The employer must ensure equal employment opportunity is given to all members.
- The employer has the duty to establish a framework to follow in the event of workplace discrimination or harassment experienced by an individual.
- The employer has to maintain strict confidentiality for any information shared by members regarding their disability, medical condition, gender, orientation, religion, or caste status.
- The employer has to make appropriate disciplinary action, up to and including termination of employment or engagement, in case of violation of 'Equal Opportunity and Fair Treatment Policy'.
- The employer must ensure employment is based on merit and not on any irrelevant attribute or characteristics that an individual may possess.
- The employer must ensure all members receive equal access to training and development opportunities
- The employer has a duty to provide safe and healthy working conditions while also preventing occupational injuries from occurring at sites.

- The employer is duty-bound to work towards modifying the existing infrastructure to cater to the changing needs and requirements of the business and the members.

Member Rights:

- Members have the right to equal access to opportunities within the organization, regardless of factors such as gender, race, disability, or other protected characteristics.
- Members have the right to fair and just treatment at workplace where decisions related to employment, promotions, and other aspects are made impartially and without bias.
- Members have the right to work in an inclusive environment that embraces diversity, respecting differences in backgrounds, perspectives, and characteristics.
- If a member feels they have been treated unfairly, they have the right to access and utilize grievance procedures and raise complaint to address concerns and seek resolution.

Member Duties:

- Members must recognize policies pertaining to equal opportunity and fair treatment and cooperate with their implementation.
- Members must ensure cooperation in building an environment free from discrimination on factors such as gender, race, disability, or other projected characteristics.
- Members must observe inclusivity among peers.
- Members must comply with this policy, applicable laws & regulations in letter and spirit. Adherence and compliance are mandatorily required whenever the member is representing the company.
- Manager and Supervisor must comply with this policy, applicable laws & regulations in letter and spirit. Adherence and compliance are mandatorily required whenever the member is representing the company. Managers and Supervisors also must take reasonable steps to resolve issues highlighted/identified to/by them, inform HR and maintain confidentiality.
- Human Resources is to comply with this policy, applicable laws & regulations in letter and spirit. Adherence and compliance are mandatorily required whenever the member is representing the company. Human Resources must also advise, address grievances, resolve issues highlighted/identified to/by HR and maintain confidentiality.

For Trident Limited

Authorized Signatory