

<b>Guideline / Policy</b>	Title	Human Rights Policy
	Version	V5
	Issue Date	02/09/2019
	Revision Date	26/07/2024

<b>Document History</b>
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Version	Date of Amendment	Author	Brief Description of Change	Reviewed By
1	02/09/2019	SHR	Introduction of policy	Business IR
2	02/07/2021	SHR	Aligning the policy with all recent amendments	Legal
3	17/09/2022	SHR	NA	Chief of IR
4	26/02/2024	SHR	Annual Revision and Addition of Employer and Members Rights & Duties	Process Owners & Knowledge Partners
5	26/07/2024	SHR	Review of policy	Process owner

## I. Introduction

At Trident, we are committed to positively impacting the world around us, recognising that upholding human rights is essential to achieving this goal. We are committed to identifying, preventing and mitigating potential and actual adverse activities that may have an impact on human rights resulting from or caused by our business.

We strive to comply with the highest ethical and moral standards in the conduct of our business. To this effect, we have implemented and enforced effective systems to ensure the preservation of the rights of our workers and members. Trident respects the dignity of our members in the workplace, and we are accountable for ensuring our members' rights to personal security, a safe, clean and healthy workplace, and freedom from harassment or abuse of any kind.

We recognise the importance of our obligation to promote and observe internationally recognised human rights in how we conduct and operate our business. We are committed to ensuring that our workplace, our supply chain, and our community is safe, lawful, and diverse – respectful and responsible everywhere, every day.

Our Human Rights Policy is guided by the International Bill of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact Human Rights Principles, the United Nations Permanent Forum on Indigenous Issues and the United Nations Guiding Principles on Business and Human Rights.

We are committed to engaging with stakeholders in the communities we operate, to ensure that we are listening to, learning from, and considering their views as we conduct our business. Where appropriate, we are committed to engaging in dialogues with stakeholders on human rights issues related to our business. We believe that local issues are most appropriately addressed at the local level, provided they comply with our commitments in this Policy. Furthermore, we are devoted to generating economic opportunities and cultivating positive relationships in the communities we serve through initiatives that are relevant at the local level.

Where we encounter a conflict between internationally recognised human rights and the national laws of the country in which we operate, we will seek ways to promote and honour the principles of international human rights to the greatest extent possible.

This policy is intended to express the Company's commitment to carry out the business with ethical values and embrace practices that support human rights in every geography, where it operates. The Company follows processes that seek ways to honour the principles of International Human Rights. The Company wholeheartedly encourages business partners, to respect human rights, adhere to applicable international principles and respect the spirit and intent of this policy.

We acknowledge that our key human rights priority areas may change over time alongside changes to how and where we operate. This is why we continue to monitor the human rights priorities defined ahead in the policy, assess the effectiveness of existing mechanisms, and make ongoing improvements to our risk management processes for all human rights concerns.

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

Our Human Rights Policy applies to Trident Limited, the entities that we own, the entities in which we hold a majority interest, and the facilities that we manage. It is applicable to all individuals working at all levels and cadres (whether permanent, fixed term, temporary and contractual), directors, retainers, consultants, contractors, trainees, casual workers, suppliers, vendors or those associated with us or any of our subsidiaries/associates in any other capacity.

Our partners and suppliers shall strictly adhere to the principles in this Policy and adopt similar policies within their businesses.

We give due consideration to human rights when deciding to engage or end business relationships.

Consistent with the guiding principles outlined above, this Policy also commits Trident Limited to work proactively to support human rights in the communities in which we operate.

### III. Key Definitions

**Forced Labour:** Forced labour refers to all work and service exacted from any person under the threat of penalty, for which the person has not voluntarily offered himself or herself. Penalties include, but are not restricted to:

- Physical, psychological, or sexual violence against a worker or family or close associate
- Retaliation
- Imprisonment or restriction of movement
- Withholding valuable documents such as identity documents or residence permits
- Debt bondage or manipulation of debt
- Denunciation to authorities (such as police or immigration) and deportation
- Dismissal from current employment
- Exclusion from future employment
- Exclusion from community and social life
- Removal of rights or privileges (such as promotion, transfer, access to new employment, social benefits)
- Deprivation of food, shelter, or other necessities
- Shift to even worse working conditions.
- Loss of social status.

**Bonded Labour:** Bonded labour means the system of forced, or partly forced, labour into which a debtor enters, or has, or is presumed to have, entered into an agreement with the creditor.

**Indentured Labour:** Indentured labour refers to a person who has entered into an agreement / voluntarily agreed to work in lieu of money borrowed and thereby pay off the debt without asking for wage.

**Prison Labour:** Prison Labour refers to all work and service exacted from a person who has been detained in prison followed by any conviction in a court of law.

**Supplier:** It means sub-supplier and supplier including any of the business partners whether or not involved in the manufacture or supply of goods to Trident Limited.

**Manufacturing Unit:** It means such factories or establishments, or process houses or stores or warehouses or any other unit wherein any process of manufacture or supply of goods is carried out by the Company or any of its Suppliers.

**Modern Slavery:** Modern Slavery 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. Slavery refers to the ownership of people's labour without adequate compensation. Servitude is the condition of being forced into slavery.

**Trafficking:** Trafficking in persons, or human trafficking, involves the recruitment, transportation, transfer, harboring or receipt of a person (a woman, man or a child), for the purpose of exploitation.

**Child:** It means a person who is below the age of 15 years, notwithstanding anything contained in any applicable law in force

**Adult:** It means a person who has completed the age of 18 years.

**Adolescent:** It means a person who has completed the age of 15 years but not completed the age of 18 years also called as “Young Worker”.

Any term not defined herein shall have the same meaning as may be prescribed under any applicable law enforced within the jurisdiction of India or any international convention thereof.

#### **IV. Policy**

We acknowledge that human rights concerns affect different businesses in different ways, so we have identified key human rights priority areas, for stakeholders, members and community, that are particularly relevant to our operations and the way we conduct our business. We acknowledge that we need to take ongoing action to assess and address potential and actual human rights risks in these critical focus areas.

We also recognise that the human rights violation risks we face may vary in different operating environments and understanding these concerns from a local perspective is crucial. We are committed to train our members and associates including contractor personnel to be aware of and respect human rights in the workplace and in the local communities directly impacted by our operations. We are committed to ongoing consultation with the local communities and our supply partners with whom we operate to better understand the nature of the potential and actual human rights risks that are present in those areas and enhance our ability to effectively address and respond to these issues.

##### **Human Rights Priority Areas for Members:**

- **Equal Opportunity and Fair Treatment**

In the spirit of our Value of Freedom, tolerance and respect for other cultures and customs are essential. Trident aims to provide equal opportunities and fair treatment, irrespective of social, cultural, ethnic or national origins, religious or other beliefs, caste, gender identity/ expression, marital status, pregnancy status, sexual orientation, disability, age, skin color, race, HIV/ AIDS status or family responsibilities or any other status protected by applicable law, political ideology, military/veteran status, or trade union activity.

We believe that the characteristics that distinguish people from one another are a source of innovation, creativity, and performance. By bringing in a variety, we obtain diverse insights as a result of our talent which is critical in today's quickly changing world.

- **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. No one is forced to work on the premises under any circumstances. Members are also free to leave the job with proper notice.

- **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. The nature of employment and all terms & conditions for that matter are stated in the appointment letter, for the purpose of mutual consent.

- **Valuing Diversity**

Trident Limited values the diversity of the people with whom we work and the contributions they make. In this respect, Trident's approach to diversity is guided by the 2022 ILO Report, entitled "Transforming Enterprises through Diversity and Inclusion." We are committed to equal opportunity and an inclusive workplace, and do not tolerate discrimination or harassment based on age, gender, caste, race, colour, ethnicity, religion, social origin, physical disability, marital status, belief, gender identification or expression, political affiliation, pregnancy/maternity status, HIV/AIDS status or family responsibilities or any other status protected by applicable law. Recruitment, hiring, placement, training, compensation, and advancement at Trident Limited is based on merit, including qualifications, performance, skills, and experience.

We do not tolerate disrespectful or inappropriate behaviour, unfair treatment, or retaliation of any kind. Harassment is unacceptable in the workplace and any work-related circumstance outside the workplace.

In order to promote a culture of respect and diversity, Trident has enacted the Diversity, Equity and Inclusion Policy and Equal Employment Opportunity Policy. To prevent stigmatization and discrimination against HIV positive persons, Trident also has in place an HIV Policy. These policies are to be referred for details and guidelines related to Diversity, Equity and Inclusion, Equal Employment and prevention of discrimination against HIV positive persons respectively.

- **Freedom of Association and Collective Bargaining**

In accordance with the Industrial Disputes Act 1947, Trade Union Act 1926 and ILO Convention 87, all workers and all employers have the right to freely form and join groups for the support and advancement of their occupational interests. Trident Limited respects workers' right to collectively bargain through various committees in place and are free to elect their representatives. Management of Trident Limited will not initiate any action against the elected member or union. Issues raised on various forums will be respected and worked upon in a positive way. Trident Limited ensures that workers are involved freely without any barriers through committees in place.

Trident's Policy on Freedom of Association and Collective Bargaining addresses this essential human right and shall be referred for additional details and guidelines.



- **Safe and Healthy Workplace**

Trident is committed to providing a safe and healthy workplace, in line with sustainability development goals. We provide a safe and healthy workplace and comply with applicable safety and health laws, regulations, and internal requirements. We are dedicated to maintaining a productive workplace by minimising the risk of accidents, injury and exposure to health risks. We are committed to engaging with our members to continually improve health, mental well-being, and safety in our workplaces, including the identification of hazards and remediation of health and safety issues.

To this effect, Trident has enacted the PPE Usage Policy, Sharp Tools Usage and Control Policy, and Environment, Health & Safety Policy. These policies elaborate on the guidelines and procedures related to the health and safety of the members and other relevant stakeholders.

- **Workplace Security**

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Trident, therefore, has a Policy on Diversity and Inclusion Policy and Prevention of sexual harassment policy in place to protect members from incidents of violence and harassment. Security safeguards for members are provided as needed and will be maintained with respect for member privacy and dignity. We value the importance of the right to privacy, and we ensure that the ways we collect, store and handle personal information comply with applicable data protection and privacy laws.

- **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. Trident does not condone, endorse or engage in modern slavery in any scope or form, including, forced labour, bonded labour, prison labour, indentured labour or trafficked labour, in any of its business operations or value chain. We have set up strict guidelines for members, contractors, business partners and suppliers to encourage the disclosure of potential human rights breaches and take necessary steps to prevent and address it.

To this effect, Trident is committed to ensuring that the employment of all labour in its workforce is purely voluntary. Thus, the following procedure for recruitment has been followed:

- At the initiation of recruitment process, applicants are required to fill Personal Profile Form online on the link provided by recruiter
- At the time of recruitment, no applicant shall be required to deposit with the Company any original document. Original Documents shall only be presented for verification and returned to such applicant.
- All members shall be furnished with a written employment document (e.g. Offer letter, contract) which clearly states their terms of employment, a verbal explanation is provided whenever necessary. Any changes to the terms of employment shall be communicated transparently.
- The company shall not ask for any amount in cash or kind to secure and retain employment.
- There shall be no restriction on movement of members during and after their specified working hours

unless required in the interest of members collectively.

- Workers/ members are free to avail leaves entitled to them with prior intimation.
- Members will be free to discontinue employment after giving required notice.

Any person found to be affected by any act of forced and involuntary labour, shall be given adequate support and steps shall be taken to mitigate any loss, whether emotional, physical or mental suffered by such an aggrieved person. Remediation shall also be planned in such a manner that the aggrieved person shall endure no further loss.

#### ● **Child Labour**

Trident's approach to child labour is further guided by ILO Convention No 138 and No 182, the U.N Convention on the Rights of the Child, Factories Act, 1948 and Child Labour (Prohibition and Regulation) Act, 1986, and other applicable norms as may be enacted by the Central government or the State Government and best business practice in place, as may be applicable from time to time. Additionally, Trident Ltd promotes the right to safe childhood and will not tolerate employment of child labour or exploitation of children in any of its operations and facilities in line with Sustainable Development Goals (SDG).

To this effect, in its conduct of business, Trident Ltd-

- Shall not employ any Child member i.e., a member who is less than 18 years of age for any business/ process in any of its units or offices, notwithstanding any national law or local regulation in this regard.
- Is against any kind of exploitation of children and shall not provide employment to children before they have attained the legal age or received necessary education, as defined by relevant authorities.
- Has a robust age verification system in place through which we ensure that at the time of appointment, the age of a person is duly verified and validated with all documents considered to be valid proof of age of a person as prescribed by the Government of India, such as School Leaving Certificate, Birth Certificate, Aadhar Card, Passport etc.
- Will comply with all applicable regulations, laws, policies, orders of the Court of Record, including but not limited to those of wages, hours of work, conditions of employment, overtime, health, sanitation etc.
- Shall ensure that the age proof record is duly maintained for selected candidates.
- In case any violation of these Principles is reported or becomes known to Trident Limited and such violation is not remediated as per prescribed procedure, the Company shall take serious action, including discontinuation of the business relationship.

#### **Remediation**

In case it is found or reported that there is any Child working within the establishment, the Company shall deal with such cases as per the company's remediation plan for such Child in accordance with the Child and Adolescent Labour (Prohibition & Regulation) Act, 1986, Punjab Child Labour (Prohibition and Abolition) Rules, 1997 and other applicable local laws in this regard. The concerned Human Resources Department shall be accountable for in case any such Child is appointed and for setting up a reasonable remediation plan ensuring the best interest of the child.

The procedure for this is as below:

- Regular on-site inspections to identify potential cases of child labour
- HRM will first examine whether any child labour was appointed in the Company by mistake or on the basis of some doubtful age proof documents. The Human Resource Department will carry out a full investigation in this regard and take appropriate measures/ actions to prevent reoccurrence in the future.
- A register in Form A will be maintained in respect of children employed or permitted to work.
- In case the age of member is found between 15 years to 18 years, he/she shall not be terminated rather he/she will be given such job which is not hazardous and the arrangement for his/her education will also be made. In this case, company shall adhere to guidelines as mentioned in young worker section of this Policy.
- As per the needs and circumstances, identification of an appropriate school/training or tutoring facility for each child will be done. Besides basic literacy, the education will also involve learning skills which will be useful in gaining good employment as an adult.
- Trident Ltd. Takes primary responsibility for funding a stipend, any repatriation costs, school fees and expenses till such time he/she attains the age of 18.
- The Chief of IR of the concerned location in coordination with the management shall formulate an effective rehabilitation plan for such child which may include measures such as the possibility to provide decent work for adult household members of the affected children's family.

- **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.

It is the responsibility of local management and the Human Resources Department to implement and ensure compliance with this Policy at Trident's operation and facilities.

- **Data Privacy**

Trident is committed to protecting all personal data entrusted to its members, clients, suppliers, and any other business partner or individual it works with, because ensuring data privacy also means protecting fundamental rights and freedoms of the individuals to whom the data relates. Trident complies with the applicable data protection legislations and is committed to applying the highest standards when processing personal data. In particular, the company ensures that the processing activities it carries out encompass all the data protection principles.

- **Young Workers**

"Young worker" refers to any person above the age of 15 years, but not completed the age of 18 years. With reference to ILO Convention No.138 on Minimum Age (C138), The Policy aims to provide employment opportunities to Young Workers in accordance with the condition of service as outlined in laws enforced by Government of India including but not limited to the Child and Adolescent Labour (Prohibition and Remediation) Act, 1986 and good business practices.



For the protection of young workers, Trident Limited:

- Bars the employment of young workers in any hazardous occupations or processes.
- Ensure skill enhancement of Young Workers, by supporting formal work-based training programs as per the Certified Standing Orders & the Apprentices Act, 1961. Such programs shall however be designed in accordance with the norms of training and condition of work as specified in the applicable laws in this regard.
- shall make payment of stipend/ wages along with statutory/social security benefits as prescribed under the applicable laws to such Young Workers.

- **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. Trident operates 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. Trident's Compensation and Benefits Policy as well as Wages and Working Hours Policy addresses worker, member and labour rights as referred to under this focus area.

- **Rights of Women**

The Constitution of India mandates equality in all aspects irrespective of gender to its citizens. In this regard both the Central and State Governments have drafted several laws and ratified ILO Conventions No.100 and No.111 to ensure that women are treated with dignity and enjoy equal opportunities of growth and work at par with their male counterparts.

Trident is committed to ensuring the rights and dignity of its female members, as well as building a culture of gender equity. We believe that our women members embody in them the real strength and courage that drives the organization to success. We have always ensured that no female member feels deprived, violated or faces inequality of any sort right from appointment to working condition and thereafter.

Trident's policy towards its female members is guided by the Convention on the Elimination of all Forms of Discrimination against Women and national laws, such as, the Factories Act, 1948, the Maternity Benefit Act, 1961, the Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013, The Equal Remuneration Act, 1976, the UN Declaration of Human Rights (Article 2, 23), ILO Convention (No. 100,111) aiming at creating awareness and imparting adequate knowledge to our women members who have been an indomitable force behind growth of our Company.

Women's rights at workplace include Maternity Benefit Act, 1961 and the Madhya Pradesh Maternity Benefit Rules, 1965 -

- This Act ensures that every eligible women member is entitled to, and every employer shall be liable for payment of maternity benefit entitled to every woman in terms of this Act.
- All women are entitled to 26 weeks paid maternity leave. Details of the maternity leave can be viewed in Trident's independent Leaves Attendance Policy.

- The amount of maternity benefit for the period preceding the date of her expected delivery to be paid in advance by the employer to the woman on the production of such proof that the woman is pregnant.
- The amount due for the subsequent period shall be paid by the employer to the woman within forty-eight hours of production of such proof as may be prescribed that the woman has delivered a child
- No women member is required to work in the Company 6 weeks immediately following the date of her delivery or miscarriage
- No women member shall be asked to conduct a pregnancy test at any given point of time.
- Less strenuous tasks shall be undertaken by pregnant women. No women shall be asked to work in any workplace/situation that shall be harmful for her health.
- The leaves related to maternity, miscarriage, adoption shall be adopted as mentioned in the leaves Policy.
- No deductions of salary shall be made once the women member joins back after her maternity break.

**The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013** - Any women member facing any sort of sexual harassment may submit a written complaint to the Internal Complaints Committee ("ICC") constituted under the provisions of the said Act. This part of the Policy has to be read in conjunction with the Prevention of Sexual Harassment Policy.

**The Equal Remuneration Act, 1976 and The ILO Equal Remuneration convention, No 100 -**

The ILO Equal Remuneration Convention No. 100 and The Equal Remuneration Act, 1976, provide for payment of equal remuneration to men and women and prevent discrimination on the ground of gender against women in the matter of employment and for the matters connected therewith or incidental thereto. This shall include -

- Equal wages for equal work performed under the same circumstances
- Equality in opportunity for employment, except in cases where employment of women has been specifically barred by the Government
- Prohibition of discrimination of any kind in matters of recruitment, promotions, training and transfer.

This part of the Policy has to be read in conjunction with the Equal Employment Opportunity Policy.

**The Factories Act, 1948, the Madhya Pradesh Factories Rules, 1962 and Model Factory Rules** - The Act provides for and regulates the working of factories. The Act prescribes working conditions which are required to be maintained by the employer and include welfare provisions to ensure a healthy work environment.

**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 its women workforce which includes but not limited to:

- No section shall deploy less than 10 members at night, and total number of female members should not be less than two-thirds of the entire workforce in a unit / section.
- Adequate amount of lighting is provided where women members are appointed for work during night hours.
- Separate sitting place in the canteen shall be provided.
- Separate vehicle shall be provided for transport.

**Best Industry Practice** - In consonance with the best industry practice in place, certain rights including but not limited to those mentioned below are granted to every women member in our organization:

- Dignified and decent treatment during the recruitment process, inter alia medical examination and other procedures to be followed.
- Security frisking of women member and their belongings by women security personnel only.
- Right to maintain privacy regarding personal information or any decisions such member decides to keep private during the term of employment and thereafter, except the information which is required to be disclosed as per applicable laws and other information as may be necessary keeping in view the nature of employment.
- Workers will not be exposed to hazards that may endanger their reproductive health and Business Partners will not force workers to use contraception.
- Right to comfortable working environment and required assistance in case of certain medical conditions, subject to presentation of required proof or details as may be required and decision of the management of the company.
- **Creche Facility**- Women members shall be given permission to visit the creche within the premises of the company. They are entitled to a nursing break of 15 minutes, twice a day apart from the lunch break.
- No women member shall be asked to conduct a pregnancy test, virginity test and use of contraceptives of other forms of birth control at any given point of time.
- No commitment shall be obtained from any female worker/ member stating that she would not get pregnant at any time during the course of employment with Trident.

Trident ensures the safe and welfare provisions and facilities in the premises including but not limited to Separate enclosures and clean, sanitary washroom facilities for male and female workers, availability of Sanitary Napkins etc.

- **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.

- **Migrant Workers**

Migrant worker is an individual who has moved from usual place of resident to another place for the purpose of employment or seeking better opportunities.

We are dedicated to upholding the human rights of migrant workers within our operations. Recognizing the vulnerabilities often faced by migrant workers, we commit to ensuring fair treatment, non-discrimination, and safe working conditions for all migrant workers. This includes transparent recruitment practices, providing access to legal support and grievance mechanisms, and respecting their rights to freedom of association and collective bargaining. Through regular monitoring and reporting, we aim to uphold these principles and contribute to the well-being and dignity of migrant workers in our workforce.

- **Member Handbook**

We are committed to ensure compliance to all our obligations globally and in doing so, we believe it is important to educate members on their rights and responsibilities. We have created reference documents in the form of member handbooks and policy portals, that serve as a guide to members on their benefit entitlements. These documents are reviewed regularly to ensure they are always updated.

- **Business Ethics**

Trident believes that respect for human rights of the community can be attained through fair and transparent treatment of their members and business partners. Trident Ltd strictly prohibits corruption or the use of bribery through supply chain and other business practices, in order to safeguard the rights of the community in which it operates.

Trident conducts regular training and awareness sessions for its members to acquaint them with this Human Rights Policy and foster a culture of respect for human rights. These include educating members, associates, business partners and suppliers. Details regarding training programs and capacity building are outlined in Trident's independent Policy titled "Capacity and Capability Building Policy" and this Policy must be read in conjunction with the same.

**Communication of the Policy-** This Policy is communicated to all members in an appropriate and meaningful manner through Intranet and Notice Boards.

### **Supplier Responsibility**

Trident Limited enforces its business partners and Suppliers to abide by this Policy, notwithstanding any applicable or local laws in this regard. Supplier shall further be responsible for strict implementation of all requirements and ensure that the Company shall be made aware of any issues with respect to human rights.

The Company holds suppliers responsible for ensuring compliance within their operations.

### **Supplier responsibility towards employment of young workers**

The Company expects suppliers to monitor their own supply chains and to report immediately to the Company if any concern regarding Young Workers is reported.

The specific responsibilities of suppliers in this regard are as follows:

- Each Manufacturing Unit must have an effective system in place to check the age of all recruited members and must retain in the personal record of such Young Workers, copies of official documentation for every worker that verifies their date of birth.
- Prohibition of employment of children. Ensure that Young Workers employed in any Manufacturing Unit are medically examined and declared to be medically fit by the certified Surgeons /medical practitioner.
- Ensure full compliance with all local requirements relating to employment of Young Workers.
- Conduct hazard identification and possible risk assessment for Young Workers and not to engage such Young Workers in any hazardous process.
- Working hours of such Young Workers shall be as defined under the applicable law in force in India. In no case the same shall be equivalent to working hour of an Adult.

- Adequate provision for rest between working hours shall be provided by the Supplier as per applicable laws.
- Ensure that Young Workers receive timely wages along with other statutory/Social security benefits as prescribed under the laws of India.

**V. Interpretation and Guidance**

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

**VI. Training**

To ensure a workplace culture that values and upholds human rights, all members at our organization will undergo periodic comprehensive training on the Human Rights Policy. This training will empower individuals to recognize, prevent, and address instances of discrimination, fostering an inclusive environment where everyone is treated with dignity and respect. Through this initiative, we aim to promote a shared understanding of our commitment to human rights principles and integrate them seamlessly into our day-to-day operations.

**VII. Exception**

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

**VIII. Review Timeline**

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

**IX. Governance**

**Responsibility Matrix**

Implementation/Execution	HRBP, IR Team & Legal Team
Monitoring	Corporate ESG & Corporate HR
Auditing	Risk Management, Group Head HR & IR, CHRO
Ownership	HR Team & Legal Team



## **V. Grievance Mechanism**

### **Receipt of Internal Complaints and Procedure**

- Any person facing human rights violations, in any scope, form or manifestation, should reach out to the concerned Human Resource Department.
- In case any individual to whom the Policy is applicable/department or business partner observes any incident which violates the human right of any person, they shall report the same to the Business IR or the Chief of IR of the concerned unit at the earliest.
- All Trident members and associates have an obligation to report suspected violations to this Policy, in any parts of our business at the earliest possible stage. All such reports will be kept highly confidential.
- In the case of a person reporting any such incident in good faith, the report shall, in no way, be construed as an act of retaliation and no one shall suffer differential treatment because of it.
- The issue should first be reported verbally/in writing only in a confidential manner to the Business IR or the Chief of IR.
- The written complaint should be in duplicate so that one copy is available with the complainant as well.
- If any person is unsure whether a particular act or omission constitutes a human rights violation, they may raise their concern with the Chief of IR.
- Any aggrieved person or otherwise can register their complaints as per company complaint/grievance redressal policy.

### **Resolution Procedure**

Under this Policy, any member will not indulge, at any time and on any occasion in any action or gesture directly or indirectly that violates one's human rights contained by the Constitution of the Republic of India. Such actions if noticed, found, or informed will be dealt with strictly by the management.

- On receipt of the complaint, the Human Resource Department shall take adequate measures as per Company Policy on disciplinary actions and initiate an inquiry into the incident in line with the applicable laws and Disciplinary procedure prevalent in the Company.
- If any Member is found indulging in any such kind of activity (ies), such Member will be liable for strictest disciplinary action as per Company's Standing Order /Service Rules/Policies, including dismissal/termination of services/ contractual or business relationship, as the case may be.
- In case of any legal action is initiated by any Government Authority against a member for conduct which constitutes violation of human rights, such member shall be personally liable for all legal consequences for any activity conducted in deviation from this Policy thereof and the Company shall not indemnify the Member in any manner whatsoever.
- For resolution of any grievances pertaining to violation of Human Rights in the company, Group Head HR of the company shall have the governing and the highest authority.

### **Receipt of External Complaints**

External complaints may be received by those persons working in organisations Trident has an association/ business relationship with, however, are not in direct employment by Trident.

Procedure for External Complaints:

- Individuals to whom the Policy is applicable or business partners observing human rights violations must follow a structured procedure when reporting incidents. This process aims to ensure a comprehensive and effective response to external complaints:
- Observing individuals should promptly notify the Business IR or the Chief of IR of the incident details, including the nature of the violation, date, time, and any involved parties.
- The complainant must utilize designated channels for confidential reporting, ensuring the protection of the complainant's identity and facilitating a secure communication environment.
- A formal incident report summarizing the observed violation should be prepared and the report should include relevant details for a comprehensive understanding of the incident.
- Strict confidentiality must be maintained throughout the reporting process.
- Regular updates on the progress of the investigation and resolution should be provided to the supervisor of the accused and to the complainant to ensure that necessary action has been taken against the accused. The Group Head HR is also kept informed for any such ongoing investigations based on the severity of the case.
- The complainant will be protected from any form of retaliation or differential treatment.
- In instances where individuals are uncertain about whether an observed act constitutes a human rights violation, they should seek guidance from the Chief of IR.
- Periodic training sessions and awareness programs will be conducted to educate applicable individuals and business partners on the proper procedure for observing and reporting external complaints.

#### **Other Channels for filing a Complaint on Human Rights Violation:**

- **Panchsabha** –Any aggrieved person having any grievance of abusive/ unparliamentary language, rude behavior from his senior and his colleagues, grievance regarding discrimination, issue of salaries, victimization, complaint regarding non-adherence of values of company, integrity, regarding consuming of any prohibited substance, regarding any disciplinary issue/security issue and issues regarding any practical/ social/ economic issues may approach Panchsabha for redressal of their grievance. Panchsabha will immediately take action and will take all necessary steps by calling all the parties to the matter in issue and will get the matter resolved within a period of 48 hours.
- **Visual Communication Boards:** These will have the details of the concerned personnel, with their numbers displayed in every area.
- **Suggestion Box:** In case anybody wants to lodge any anonymous grievance he/she may do so by dropping the same in suggestion box which is directly taken care by Business IR.
- **Sameep AI Chatbot:** In case anybody wants to lodge any grievance/ Suggestions/Opinions/ Improvement ideas etc. He/she can do the same by raising the ticket in Sameep App. Complaint shall be assigned to the concerned Stakeholders. If not resolved, the same will be escalated to manager and later with HOD of concerned stakeholder.
- **24\*7 Helpline Service KAAN:** A 24\*7 Helpline Service known as “KAAN” is also available where an aggrieved member can contact this helpline in case of his /her any unresolved grievances. The member can contact on following numbers-
  - 9878999200
  - 9878999300
  - Ext. 3300

This cell directly shares the grievance issues with the Chairman of the organization.

### **Employer Rights:**

- Where the employer encounters a conflict between internationally recognised human rights and the national laws of the country in which it operates, it will seek ways to promote and honour the principles of international human rights to the greatest extent possible.
- The nature of employment and all terms & conditions for that matter are stated in the appointment letter, for the purpose of mutual consent.
- The employer has set up strict guidelines for members, contractors, business partners and suppliers to encourage the disclosure of potential human rights breaches and take necessary steps to prevent and address it.
- In case any violation of these Principles is reported or becomes known to the employer and such violation is not remediated as per prescribed procedure, the Company shall take serious action, including discontinuation of the business relationship.
- The employer must conduct regular onsite inspections to identify potential cases of child labour.
- On receipt of the complaint, the Human Resource Department shall take adequate measures as per Company Policy on disciplinary actions and initiate an inquiry into the incident in line with the applicable laws and Disciplinary procedure prevalent in the Company.
- The employer reserves the right to conduct a fair and impartial investigation during the formal complaint stage, involving relevant parties, gathering evidence, and ensuring a transparent process that respects the principles of natural justice and can take necessary action based on the severity of the case leading up to termination. In case any such incident has been reported, the same should appear in the record and shall be published physically & digitally.

### **Employer Duties:**

- The employer is devoted to generating economic opportunities and cultivating positive relationships in the communities it serves through initiatives that are relevant at the local level.
- The employer has to work proactively to support human rights in the communities in which it operates.
- The employer is committed to train its members and associates including contractor personnel, to be aware of and respect human rights in the workplace and in the local communities directly impacted by its operations.
- The employer must aim to create an inclusive workplace and leverage the power of diversity for sustainable competitive advantage, where members from different backgrounds can have the opportunity to participate, develop and contribute freely and equitably.
- The employer must provide a safe and healthy workplace and comply with applicable safety and health laws, regulations, and internal requirements.
- The employer has a duty to maintain a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.
- All members shall be furnished with a written employment document (e.g., Offer letter, contract) which clearly states their terms of employment, in a language understood by the member, with a verbal explanation provided whenever necessary. Any changes to the terms of employment shall be communicated transparently.
- The employer must ensure that the age proof record is duly maintained for selected candidates.

- The employer has a duty to comply with Child and Adolescent Labour (Prohibition & Regulation) Act, 1986, Punjab Child Labour (Prohibition and Abolition) Rules, 1997 and other applicable local laws.
- In case the age of member is found between 15 years to 18 years, he/she shall not be terminated rather he/she will be given such job which is not hazardous and the arrangement for his/her education will also be made. In this case, the employer shall adhere to guidelines as mentioned in young worker section of this Policy.
- The employer must always ensure that no female member feels deprived, violated or faces inequality of any sort right from appointment to working condition and thereafter.
- The employer must ensure that less strenuous tasks shall be undertaken by pregnant women. No women shall be asked to work in any workplace/situation that shall be harmful for her health.
- The employer has to ensure that no deductions of salary shall be made once the women member joins back after her maternity break.
- The employer must comply with The Equal Remuneration Act, 1976 and The ILO Equal Remuneration convention, No 100.
- The employer must comply with The Factories Act, 1948, the Madhya Pradesh Factories Rules, 1962 and Model Factory Rules.
- The employer must ensure that no section shall deploy less than 10 members at night, and total number of female members should not be less than two-thirds of the entire workforce in a unit / section.
- The employer must provide adequate amount of lighting is provided where women members are appointed for work during night hours.
- The employer must ensure that separate sitting place in the canteen shall be provided for female workers during night hours.
- The employer must ensure that separate vehicle shall be provided for transport for female workers who are working during night hours.
- The employer must ensure skill enhancement of Young Workers, by supporting formal work-based training programs as per the Certified Standing Orders & the Apprentices Act, 1961.

#### **Member Rights:**

- Members have the right to freely choose their employment as per the availability of the job and the requirement of skills. No one is forced to work on the premises under any circumstances. Members are also free to leave the job with proper notice.
- Members have the right to freedom of expression.
- Members have the right to form and join a trade union, by national laws, and we recognize such organizations for the purpose of collective bargaining.
- Women's rights at workplace include Maternity Benefit Act, 1961 and the Madhya Pradesh Maternity Benefit Rules, 1965.
- Any women member facing any sort of sexual harassment may submit a written complaint to the Internal Complaints Committee ("ICC")
- Women member shall be given permission to visit the creche within the premises of the company. They are entitled to a nursing break of 15 minutes, twice a day apart from the lunch break.
- All migrant workers shall have the same rights as other members of Trident, including, the right to freedom of association and collective bargaining, rights against forced labour, rights against child labour and protection from discrimination in employment and occupation.

- Any person facing human rights violations, in any scope, form or manifestation, has the right to reach out to the concerned Human Resource Department.
- Members will be free to discontinue employment after giving required notice.

**Member Duties:**

- Members must ensure inclusivity among peers.
  - Members must not discriminate basis age, gender, caste, race, colour, ethnicity, religion, social origin, physical disability, marital status, belief, gender identification or expression, political affiliation, pregnancy/maternity status, HIV/AIDS status or family responsibilities or any other status protected by applicable law.
  - Members have to provide timely and accurate responses to Pulse surveys conducted by the employer.
  - Members must comply with PPE Usage Policy, Sharp Tools Usage and Control Policy, and Environment, Health & Safety Policy.
  - Members have the duty to provide legitimate documents representing the correct age of individuals.
  - Members must comply with Capacity and Capability Building Policy.
- Any member will not indulge, at any time and on any occasion in any action or gesture directly or indirectly that violates one's human rights contained by the Constitution of the Republic of India.

For Trident Limited

Authorized Signatory