

TRENT LIMITED

COMMUNICATION ON PROGRESS

Year: 2008-2009

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STATEMENT OF CONTINUED SUPPORT

Message from the Managing Director

Ladies and Gentlemen,

I am delighted to submit our first Communication on Progress to the Global Compact Society for the financial year, 2008-2009.

Trent Limited is a signatory to the United Nations Global Compact and remains committed to principles even as we strive for progress. Our drive will be in the direction of reaching out to the entities and people we do business with. Being a good corporate citizen is an ambition enthusiastically embraced at all levels within our company. As a member of the Global Compact, we believe that our business policies incorporate the ten principles. Our board fully supports our actions in working towards sustainability goals – in particular those contained in the UN Global Compact – and endorse the future priorities and specific targets we set out in our report. Through our support of the United Nations Global Compact, we also aim to move the agenda forward on performance related to human rights, labour rights, the environment and the fight against bribery and corruption. We strongly believe that a key ingredient of that commitment includes keeping stakeholders informed of our ongoing sustainability efforts.

The report covers the commitments, actions and plans with respect to the sustainability framework. The report also enumerates the partnerships of the company with the society and industry to champion the cause of human rights protection.

We trust that the information provided in this report provides you an insight into how we endeavour to improve the quality of life of our stakeholders.

We look forward to your feedback on our progress.



NOEL N. TATA

Managing Director

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ABBREVIATIONS

AMC	Annual Maintenance Contract
BSC	Balanced Scorecard
CFTS	Customer Feedback Tracking System
CPSC	Consumer Product Safety Commission
CSS	Customer Satisfaction Survey
E & I	Evaluation and Improvement
EC	Ethics Counselor
EPA	Environment Protection Act
ESS	Employee Satisfaction Survey
HO	Head Office
HOD	Head of Department
LEC	Local Ethics Counselor
N.G.O	Non Governmental Organization
QA	Quality Assurance
QC	Quality Control
SC	Scheduled Caste
ST	Scheduled Tribe
T CoC	Tata Code of Conduct
TQMS	Total Quality Management Services
VMS	Vendor Management System
VSS	Vendor Satisfaction Survey

INTRODUCTION

Trent Limited is a signatory to the United Nations Global Compact, a platform for encouraging and promoting good corporate principles and learning experiences in the areas of human rights, labour, environment and anti-corruption. This Communication on Progress provides an overview of commitments, activities and plans during 2008-2009 in support of the Global Compact's objectives. Our commitment to sustainability drives our environmental endeavour, good corporate citizenship in our workplaces and communities, and the products and services we provide to customers.

At Trent Limited, our sustainability policy integrates economic progress, environmental concerns and social responsibility with the objective of “Improving quality of life” and building “Leadership with Trust”. We believe in integration of our business values, cultural pillars and operating principles to meet the expectations of our customers, employees, partners, investors, communities and wider society.

Our commitment thus is:

- We will uphold the values of integrity, understanding, unity, excellence and responsibility with stakeholders.
- We seek to train and recruit a right mix of fresh and experienced people that reflect the diversity of the communities in which we operate, to give equal opportunities to all of our staff, and provide decentralized training, learning and development to help them have fulfilling and rewarding careers.
- We aspire to create an equal platform of opportunities for the socially and economically disadvantaged sections, specifically for the Scheduled Caste / Scheduled Tribe (SC/ST) communities.
- We strive to contribute to safeguarding the environment and improving biodiversity.
- In accordance with the National Policy on Child Labour, we intend to enforce the same by taking proactive steps to make our organization child-labour free, in the true sense of the word.
- In accordance with other Labour Laws, we seek to identify possible occupational hazards and promote in totality, the health and safety of our employees.

We will establish range of Corporate Sustainability targets, measure and review our performance against them and report on an annual basis.

UPHOLDING AND SAFEGUARDING HUMAN RIGHTS

OUR COMMITMENT

Trent Limited acknowledges that every single human being is entitled to enjoy his or her human rights without distinction as to race, colour, sex, language, religion, political or other opinion, national or social origin, property birth or other status.

Trent Limited abides by the Constitution of India and law of the land and levies utmost importance to human rights thereby upholding and safeguarding the same. To translate the above mentioned into actions, the company has adopted certain standards and codes and adhere to them very strictly.

Following is an insight into the company's philosophy on Corporate Governance, and certain other codes that are adhered to with respect to protecting and upholding human rights:

A brief statement on Company's philosophy on Corporate Governance:

The Company's philosophy on Corporate Governance is to observe the highest level of ethics in all its dealings, to ensure efficient conduct of the affairs of the Company and help the Company achieve its goal in maximizing value for all its stakeholders. The Company's philosophy is in line with the Tata Group's long standing tradition of fair and transparent governance.

The Company has adopted the Tata Code of Conduct (Tata CoC) for its employees including the Managing Director. In addition, the Company has adopted a Code of Conduct for its Non-Executive Directors. The Company's corporate governance philosophy has been further strengthened through the Tata Business Excellence Model, the Tata Code of Conduct for Prevention of Insider Trading and the Whistle Blower Policy. The Company is in compliance with the requirements of the revised guidelines on corporate governance stipulated under Clause 49 of the Listing Agreements with the Stock Exchanges.

Tata Code of Conduct:

Trent Limited has adopted the Tata Code of conduct (Tata CoC) which serves as a guide on the values, ethics and business principles to be followed. It is a set of 25 principles which enshrine the human rights principles, adherence to labour standards, commitment towards environment protection and anti-corruption. Tata CoC has been developed to ensure high standard of corporate and personal behaviour on which the Tata Group's reputation and respectability has been built over the past years.

Trent Limited adheres to Tata CoC strictly in all its transactions with all the stakeholders thereby embedding the values of the group along with the Leadership's focus on walking the talk.

To view the Tata Code of Conduct, please visit our website at <http://www.mywestside.com/tatacodeofconduct.pdf>

Whistle Blower Policy:

Trent Limited has adopted the Whistle Blower Policy that is an extension of the Tata Code of Conduct. It provides a formal mechanism for all employees of the Company to approach the Ethics Counselor/ Chairman of the Committee of the Company and make protective disclosure about the unethical behavior, actual or suspected fraud or violation of the Company's Code of Conduct. All employees of the Company are eligible to make Protected Disclosures under the Policy.

ACTIVITIES & MEASURES

Induction

As part of our induction program, all new employees undergo two days of training with respect to the various policies and procedures of the company. These also include policies and procedures concerning aspects of human rights like Tata CoC, Whistle Blower Policy, Human Resource policy and the Role of the Ethics Counselor.

Measure

<u>Target Set</u>	<u>Results Achieved</u>
100% Employees	The target has been achieved as 100% of the employees have been trained with regards to aspects of Human Rights

Health and Safety

SAFETY AND HEALTH POLICY

Trent Limited accepts, without reservation, its legal obligation to provide, so far as is reasonably practicable, a safe and healthy working environment for all employees, wherever they may be located. Our commitment to Health & Safety ranks equally with that which we give to operations, retailing, finance etc., and it has the full support of the Managing Director.

As an employee, you are our most important asset. It is therefore our policy to provide and maintain so far as is reasonably practicable, a safe place of work; a safe working environment; safe handling, use, storage and transport of articles and substances; safe plant, equipment and systems of work; and to provide such information, instruction, training and supervision as is necessary to ensure health and safety.

We shall also undertake to ensure, so far as is reasonably practicable, that persons not in our employment, who may be affected by our activities, are not exposed to risks in their health & safety; to fully satisfy our legal requirements with regard to Health & Safety Policy, so that we can fulfill our statutory duties and legal obligations to you; and to not intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety and welfare.

Our policy on health & safety at work can only be effective with your active cooperation.

Alongside the Health and Safety Policy, Trent Limited also abides by the Tata CoC which states the following:

“A Tata company shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs”

We at Trent Limited use the learning acquired from visits to international retail stores, customer feedback and learning from past experience to ensure greater care and safety of consumers visiting our stores. All the new incumbents undergo medical tests to recruit a healthy work force. A special thrust is given to ergonomics and accordingly projects and operations to ensure that store layout, and design of fixtures is aimed at providing working comfort to employees.

Pest control is carried every month as a part of the AMC at all locations for improving work place environment. Inputs are taken from employees through the ESS process and also information on safety, health and security is taken from employees by Managers and Seniors as a part of a 2-way communication process.

The performance measures for the workplace factors for different locations are as follows:-

Key Work place Factors and Targets for Work Units

<u>Workplace Factor</u>	<u>Target</u>	<u>Work Units</u>	<u>Compliance Through</u>
Accidents	Nil	All	Accidents and incidents report from each store to HO
Health – hazardous incidents	Nil	All	
Security – theft incidents	Nil	Stores	
Ergonomics – Complaint on discomfort	Nil	All	
Parking	100%	All	CFTS/ Incident report
Rest rooms/lockers @ stores	100%	Stores	Project report
Cable TV @ all stores	100%	Stores	Store opening report
Lighting	1000Lux	Stores	Maintenance report
AC temperature -Summers AC temperature - Winters	220C ± 1 240C ± 1	All	
Seating arrangement; email, telephone	100%	HO & locations	Direct feedback
Other amenities	100%	All	Project cycle report
Housekeeping staff – cleanliness, hygiene	100% adherence	All	Checklists based @ Locations
Exit points	-do-	All	Project report
Emergency plan	-do-	All	Project report
Fire wardens / first aiders	-do-	Stores	Managers’ report
Company doctor	-do-	All	Part of company policy
Emergency numbers list	-do-	Stores	Displayed at all Stores

The work place preparedness and emergencies are ensured using the services of the external audits before and after store opening. Reports given by Tata AIG, Govt. agencies and self-assessments provide valuable inputs to take preventive measures.

As an E&I the Company made changes in the placement of fire extinguishers at stores based on the inputs given by one of the customers to a senior executive.

As part of the continuous training provided to all the employees, the following aspects are covered:-

Training Modules		
<u>Training</u>	<u>Focus on</u>	<u>Module includes</u>
Induction training for new store opening (Customized)	<ul style="list-style-type: none"> • Values • Safety • Health • Tata CoC • Behavioral • Environment 	<ul style="list-style-type: none"> • Tata Values and Trent Values • Fire fighting training & safety at work • First aid training • Inputs on Tata CoC, Shrinkage, theft • Functional inputs by practitioners • Communication skills, building positive attitude,

CORPORATE CITIZENSHIP

OUR COMMITMENT

We at Trent Limited adhere to the Tata CoC which states the following:

“A Tata company shall be committed to be a good corporate citizen, not only in compliance with all relevant laws and regulations, but also by actively assisting in the improvement of the quality of life of the people in the communities in which it operates, with the objective of making them self-reliant.

Such social responsibility would comprise: initiating and supporting initiatives in the field of community health and family welfare, water management, vocational training, education and literacy, and encouraging the application of modern scientific and managerial techniques and expertise. This will be reviewed periodically in consonance with national and regional priorities.

The company shall also not treat these activities as optional ones, but shall strive to incorporate them as integral part of its business plan. The company shall also encourage volunteering among its employees and help them to work in the community. Tata companies are encouraged to develop social accounting systems and to carry out social audits of their operations.”

Trent Limited through its Corporate Sustainability department strives to address the concerns of its employees, stakeholders and the community (especially the underprivileged section of the society).

In order to realize the same, it follows a 2 fold process:

STEP 1] Selecting the Key Communities

**STEP 2] Deciding the Thrust areas and clearly outlining the Action Plans
For Implementation**

&

Setting up a process to Measure and Review the Results

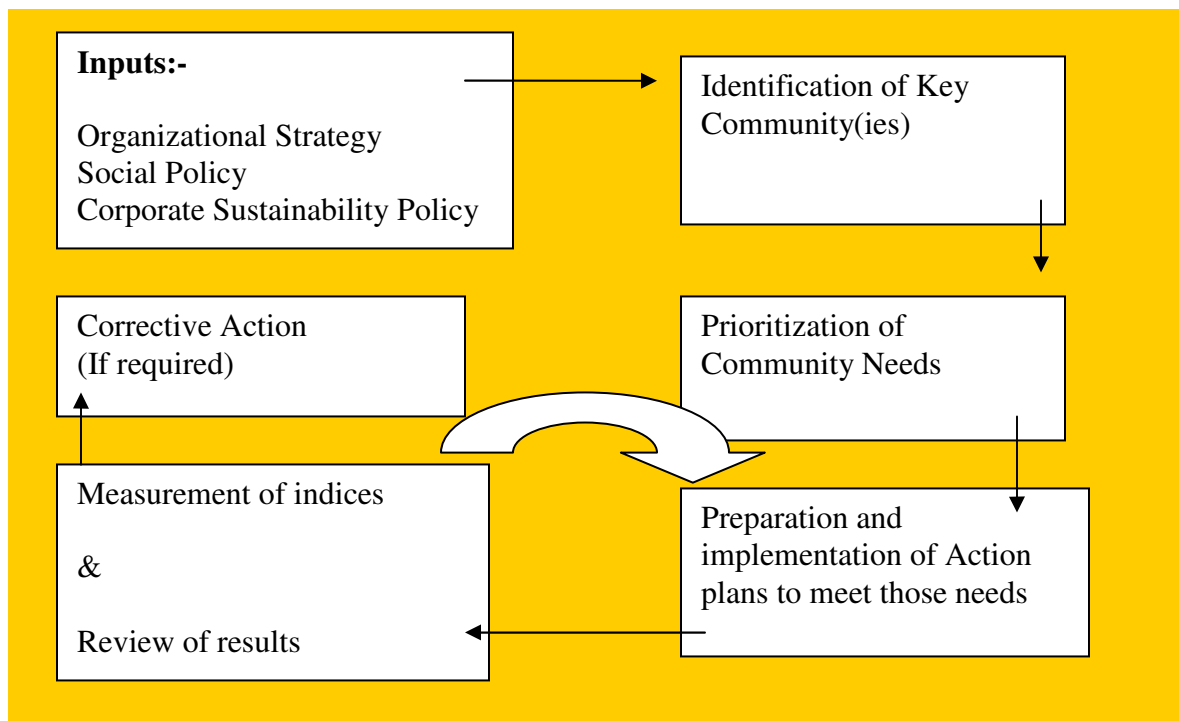
(With respect to all the initiatives of the company, tangible, verifiable and measurable targets have been assigned and the same is reported on a periodic basis to the apex team during the BSC review).

STEP 1]

To ensure that the activities carried out by the Company have an impact, the company follows an exercise of selecting communities based on the felt needs, prioritization of these needs and further outlining action plans for the same.

The process of selecting the key communities is as follows:

SELECTION OF KEY COMMUNITIES



The process of selecting Key communities is based on the Corporate Sustainability and Social Policy of the Company. The Company carries out initiatives to serve the key communities as shown in the above figure

SOCIAL POLICY

India is a youthful country with a large percentage of the population being in the younger age brackets. We believe that these young people shall be the backbone of the nation in the coming years. It is therefore our intention to focus on the socially underprivileged children in order to provide them with a chance to have a better life tomorrow.

We shall dedicate resource commensurate with our business requirements to community activities that work towards improving the future of socially underprivileged children. We shall also use our assets and our expertise in the retail business to further the cause of such communities.

STEP 2]

ACTIVITIES & MEASURES

Our Company based on the selection of the key communities intends to lay emphasis on the following thrust areas namely Education, Employment, Employability, Health & Safety, Environment and furthering other relevant social endeavours thereby promoting their basic human right to lead a life of dignity.

An overview of the actions taken, its impact and the plans formulated with regards to the same for the coming year are briefly outlined as follows:

Education

A total of 123 employees from our organization are being provided with subsidized education with regards to a course on Retail Management. We have partnered with an Educational institute from Ahmedabad. The classes are conducted through satellite centres across various cities in India.

<u>Initiative</u>	<u>Partnering Agency</u>	<u>Beneficiaries</u>
Subsidized Education In Retailing to the Employees	a) Mudra Institute of Communication, Ahmedabad	123 employees

This year, we intend to provide subsidized education to 25 more employees for an Under Graduate Course in Retail Management. By doing so, we intend to further enhance the employability of our employees and empower them.

Employment

20 underprivileged youth from the nearby communities were employed within our organization, in the last year.

All the youth underwent One month training in Retail Management. The training for the same was provided by volunteers of our organization.

<u>Initiative</u>	<u>Partnering Agency</u>	<u>Beneficiaries</u>
Providing employment to the underprivileged youth	a) Kherwadi Social Welfare Association	20 youth from the community

In the following year, we intend to provide employment to around 100 youth from the communities and partner with 3 more N.G.O's for the same.

Upon reviewing the old training model as described above with regards to training the underprivileged youth, the Corporate Sustainability team has designed a new training model which is both sustainable and scalable. This model would be implemented in the following year for continuous training and upgradation of the underprivileged youth.

(Please refer Pg. 14 for more details)

Employability

In our endeavour to champion the cause of employability we have partnered with four N.G.O's and the Government of Maharashtra, and we intend to train underprivileged youth from the communities in a vocational course on 'Retail Operations' so as to make them employable and provide them with a Certification from the Government of Maharashtra, thereby increasing their employability. The course includes a good mix of theory and on the job training in our stores so as to fully equip every student with skills for the Retail industry.

With the intention of making the above mentioned project sustainable and scalable, we plan to train the Trainers from the N.G.O's who in turn would train the underprivileged youth. Trent Limited would take the centre stage with regards to preparation of the syllabus, training the trainers, updating the trainers on a timely basis from time to time, coordinating with respect to the exam and liaison with the Government with regards to the certification.



A Vocational Class in progress at one of the Centres in Bandra

Also, commensurate to our requirements, we intend to employ as many of these youth within our organization on successful completion of the course. Relevant processes have been set and are in place so as to ensure smooth functioning of the above mentioned.

<u>Initiative</u>	<u>Partnering Agencies</u>	<u>Intended Beneficiaries</u>
Vocational Training on Retail Operations	a) Kherwadi Social Welfare Association b) Don Bosco c) Smile Foundation d) Kotak Labs	100 underprivileged Youth from the communities

With regards to the above initiative, a comprehensive process for implementing and monitoring has been designed which is as follows:-

- a) Trent Limited will partner with N.G.O's to train the underprivileged youth.
- b) Instead of trainers from our company training the youth from the communities directly, trainers from our organization would provide training to the Trainers from the N.G.O's
- c) Trent Limited to provide training for the trainers of the partner organizations (N.G.O's).
- d) Trent Limited will provide necessary clarifications, technical assistance and constant updation to the trainers with respect to the new emerging trends in the field of Retail.
- e) Trent Limited would provide certification to the trainers.
- f) The trainers from the N.G.O's would train underprivileged youth from nearby communities
- g) Trent Limited will liaison with the Government of Maharashtra to arrange for certification for the underprivileged youth being trained.
- h) Trent Limited will arrange for store visits of the candidates enrolled in the retail course for enhancing the process of learning.
- i) Trent Limited would conduct the final assessment and co-ordination with the Government of Maharashtra with respect to the certification of the students who have successfully completed the course.
- j) Trent Limited would absorb the underprivileged youth in the organization commensurate to its requirements.
- k) Trent Limited would help the N.G.O's link with other organizations of the service industry so as to provide job opportunity to more youth.

Some of the other social initiatives are as follows:-

<u>Period</u>	<u>Activity</u>	<u>Supporting</u>
Promotion	Community Corner supporting NGOs – selling items like ‘Diyas’ with a ‘theme Help a Child – Bring a Smile’ - ‘Angels Tree’ and Stars to generate revenue to help poor children - ‘Friendship Bands’ - Items procured from NGOs and sold at no profit passing the proceeds to NGOs	Poor Children
Periodic	Selling products at concessional rates to NGOs. These NGOs in turn sell it at their charity events abroad and profits are used to look after poor children.	Poor Children
Ongoing	Placement of orders with charity organization like Ratan Tata Institute and others	Poor Children; needy and uneducated people
Ongoing	Collection of left over medicines and passing it to Associations like Ramakrishna Mission	Poor Children and other poor people

Aid to the society

As part of our commitment towards the disaster that struck Bihar and Orissa, the Company donated clothes worth Rs. 7, 50,000 (Seven Lac Fifty Thousand Rupees) towards relief for the tragedy survivors in Bihar and Orissa.

As part of the Bihar Relief and Rehabilitation initiative taken up by the Tata Relief Committee, Trent Limited contributed a sum of Rs. 10, 75,000 (Ten Lac and Seventy Five Thousand Rupees). Employees from the organization were encouraged to donate one day’s basic salary and an equivalent amount was contributed by the company towards the noble cause.

Trent Limited also makes donations towards the central corpus of the Tata Council for Community Initiatives. Youth being the focus, Trent Limited has started funding different educational institutions for student development activities. Donations have been made to various institutions all over India in support of different causes towards underprivileged children, youth, handicapped and other disadvantaged sections of society.

The leadership team regularly takes initiatives in areas of community development where it feels it can make a difference without allocating dedicated resources. Employees are encouraged to become members of the professional bodies and volunteer towards the efforts of the community bodies for local charities. Senior leaders from Trent Limited are constantly involved in educational activities through their interaction with various student groups from various educational institutions.

Trent Limited also sources some of its products from Ratan Tata Institute, a charitable institution that employs needy and uneducated people for manufacturing their products.

Under guidance of senior leaders Trent Limited is also conceptualizing the thought of employment of physically handicapped at an appropriate level.

UPHOLDING LABOUR STANDARDS

OUR COMMITMENT

Elimination of all forms of Forced and Compulsory Labour &

Abolition of Child Labour

Trent Limited strictly adheres to the laws of the land with regard to forced and compulsory labour. The operations of the Trent Limited stores are subject all the statutory regulations Shops and Establishment Act, the Weights and Measures Act, and the Packaged Commodities Act, etc. All promotional activities are governed by regulations, and the same are strictly adhered to by Trent Limited. The statutory acts related to the management of its employees and their benefits are also adhered to.

Trent Limited has a Secretarial and Legal department that ensures the compliance of all legal and regulatory requirements. The internal audit department reports, suggests and facilitates compliance as a proactive measure.

Operating under the Tata Code of Conduct emphasizes corporate ethical behaviour and the culture of Tata CoC has spread across to other stakeholders thereby ensuring practices that promote fair labour practices, non-discrimination, non-employment of child labour and safeguarding Human Rights at all levels of employment.

ACTIVITIES & MEASURES

Recruitment

As per our company recruitment policy, no individual below the age of 18 yrs. is employed within the organization. Thus we ensure that the problem is dealt with proactively at the inception itself.

Child labour assessment

The Company intends to assess the vendors associated with our company so as to ensure that none of the vendors employ child labour within their scope of work and for the same, is in the process of creating a roadmap for Communication with the vendors, Assessment of the vendor's facilities and an awareness generation program.

The company is partnering with an NGO Pratham which has been working on the issue of child labour in the country. The roadmap would be prepared in consultation with Pratham and we intend to reach out to 100% vendors across the country. A Comprehensive process would be developed for the implementation, monitoring and review of the same at a later date.

Equal opportunity for employment

Trent Limited adheres to the Tata CoC which states the following:

“A Tata company shall provide equal opportunities to all its employees and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, sex, age, nationality and disability. Employees of a Tata company shall be treated with dignity and in accordance with the Tata policy of maintaining a work environment free of sexual harassment, whether physical, verbal or psychological.

Employee policies and practices shall be administered in a manner that ensures that in all matters equal opportunity is provided to those eligible and that decisions are based on merit.”

Trent Limited believes in social equity and is an equal opportunity employer. It strives to maintain a right mix of fresh and experienced by continuously recruiting talent from available sources all over the country through its various recruitment schemes. The Company understands that cultural diversity is important to address the regional preferences of the customers. As such, most of the associates and officers are recruited from the city in which the store is located.

ENVIRONMENTAL RESPONSIBILITY

OUR COMMITMENT

As an organization, we are fully committed towards the environment and intend to take steps in a direction that reduces negative impact on the environment as a result of our business activities.

We abide by the Tata CoC which states the following:-

“A Tata company shall strive to provide a safe and healthy working environment and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territory it operates in. A Tata company shall be committed to prevent the wasteful use of natural resources and minimize any hazardous impact of the development, production, use and disposal of any of its products and services on the ecological environment.”

Impacts of products & services

The product range of Trent Limited consists primarily of apparel and accessories for ladies, men and children, household, bed and table linen and gift articles. The process of manufacture of these articles adversely impacts the environment through the use of fabric, the chemicals used in the manufacturing process, the materials used in packaging etc.

Trent Limited aims to minimize the adverse impact on society to the extent possible right at the source, i.e. the manufacturers and suppliers themselves. Feedback from customers, Industry scan, vendor and consultant interaction have led to the formulation of standards for the products of Trent Limited. Over the years Trent Limited has learnt from its customers of their concerns regarding product safety and added programs to provide greater safety features in our offerings.

Running the stores has an impact on the environment due to the usage of energy and modest amounts of water, and the waste produced as a result. Gases used in refrigeration systems can also have significant environmental impacts if allowed to escape. Some stores are located near residential areas.

Trent Limited ensures that it does not disturb the surrounding environment by complying with all local zoning and building regulations. Increased traffic to store locations can increase environmental pollution and could also lead to traffic congestion. The Company minimizes impact of traffic by ensuring location of stores in areas, which are easily accessible by public transport, and also provide adequate dedicated parking to reduce congestion in front of stores.

The processes adopted for mitigating risks associated with products are as follows:-

Processes to mitigate impact/ risks

<u>Impact on</u>	<u>Processes Used</u>
Product	<ul style="list-style-type: none"> • QC checks upgraded from time to time • Audit by an International Consultant on QC system

Target & measures to mitigate impact/ risk

	<u>Guidelines</u>	<u>Impact / risk on product/ services / operation</u>	<u>Target</u>	<u>Processes / Actions taken to Improved</u>
Consumer/ Society	<ul style="list-style-type: none"> • EPA • Proactive Measures • CPSC data base • Zoning Laws • Textile Testing Services 	<ul style="list-style-type: none"> • Pollution – use of hazardous dyes, use of plastics • Health – on Consumers • Safety – during shopping 	<ul style="list-style-type: none"> • 100% compliance to law Zero Complaints Zero Complaints 	<ul style="list-style-type: none"> • Recall process • Store layout • Training of staff • Product design • Safety policy • VMS • QC testing through textile committee labs
Government	<ul style="list-style-type: none"> • Legislation /regulation • Income tax • Wealth tax • Excise rules • Env. Rules • Safety rules • Shops and Estbtt. Act 	<ul style="list-style-type: none"> • Legal non compliance • Statutory requirement 	<ul style="list-style-type: none"> • 100% compliance to law 	<ul style="list-style-type: none"> • Legal Cell ensures • Finance dept. ensures • Safety policy • Insurance • Risk Assessment • Internal audit • External audit

During the planning and construction of stores itself, Trent Limited ensures that environmental issues like noise level, vibration level, and light intensity are taken care of.

As part of the continuous training provided to the employees, the following aspects are covered:-

Training Modules		
<u>Training</u>	<u>Focus on</u>	<u>Module includes</u>
QC training	<ul style="list-style-type: none">• Environmental issues• Vendor management• QC standards	<ul style="list-style-type: none">• Use of QC standards and legal rules – e.g. use of Azo free dyes• About VMS, ethical standards, Tata CoC

ACTIVITIES & MEASURES

a) Reduction in usage of plastic

Trent Limited has started conceptualizing the idea to make store environment friendly by reducing the consumption of plastics used for packaging the merchandise.

As part of a pilot initiative, we were successful in reducing the usage of plastic normally used as packaging material by 50% with regards to a specific clothing category (Ethnic Wear) and we further intend to scale this initiative and replicate the same across all the other clothing ranges as well.

b) Improve biodiversity-

Establishing and maintaining green islands

We plan to establish and maintain green islands in the nearby vicinity of the stores which we operate from and thus help preserve and improve biodiversity. A concrete plan is being worked on, the details of which would be available on a later date.

c) Awareness generation – mass awareness campaign

We intend to create mass awareness among our employees, customers, stakeholders and the society at large on issues related to the environment and specifically, energy conservation. For the same, we have plans of collaborating with one of the Group companies.

Through this association, we aim to accomplish 3 goals namely:-

- a. Training our internal customers about Energy Conservation
- b. To leverage the knowledge of the Group company and transfer the same to our huge customer base through appropriate and effective channels of communication
- c. To implement programs based on the above points and measure the impact of the programs e.g.-Various competitions like Quiz, Essay for children

Through information dissemination at such a large scale, we aim to create a huge impact in the long run. A plan for the same is in the making the details of which would be available at a later date.

AN ETHOS OF ANTI-CORRUPTION & PROMOTING ETHICAL BEHAVIOUR

OUR COMMITMENT

As per the Tata Code of Conduct, the company adheres to a strict policy against any corrupt practices. The policy on gifts and donations, as explicitly mentioned in the Tata CoC is reproduced below:

“A Tata company and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended to, or perceived to obtain business or uncompetitive favours for the conduct of its business. However, a Tata company and its employees may accept and offer nominal gifts which are customarily given and are of commemorative nature for special events.”

As part of our financial accountability, the Managing Director and the Chief Financial Officer of the company certify to the board that the accounts of the company present a true and fair view of the business of the company. This certification is based on the Compliance certificate furnished by each of the HOD's. The compliance certificate is as provided in a clause of the Internal Customer Satisfaction Agreement.

Any complaints regarding corrupt practices (made under the well established Whistle Blower Policy), are processed through the Ethics Counselor process. An environment of legal behaviour is ensured by identifying all the applicable legal norms and ensuring their compliance through regular reviews and process audits. The Internal Audit department strengthens the process of legal compliance by carrying out periodic audits, reporting shortcomings and also suggesting means for improvements. Ethical behaviour is reinforced by adoption of the Tata CoC, Values and their deployment through the various approaches related to Communication and Training.

The key processes adopted in carrying the message of ethical conduct and desired behaviour is as follows:-

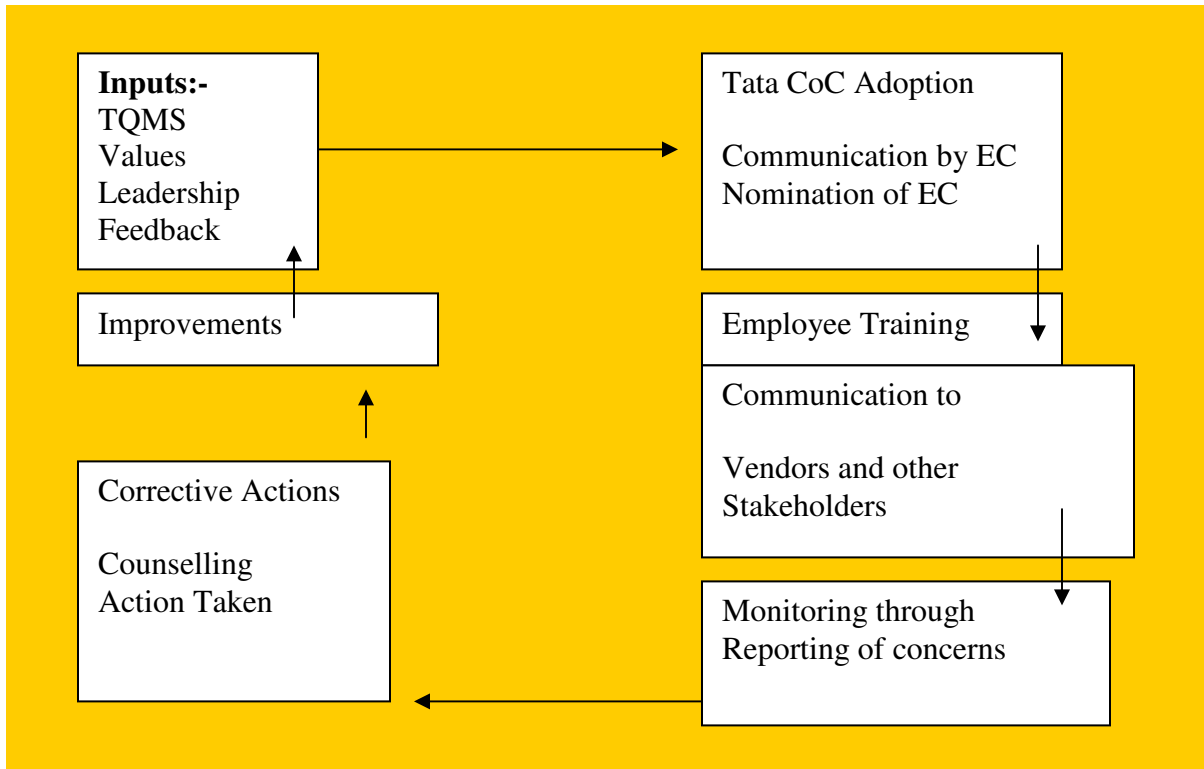
KEY PROCESSES/ INDICATORS OF ETHICAL BEHAVIOUR

<u>Stakeholders</u>	<u>Key Processes</u>	<u>Key Measures</u>
Suppliers/Vendors	<ul style="list-style-type: none"> • Vendor Selection • Interactions • Communication on Tata CoC 	VSS feedback <ul style="list-style-type: none"> • Complaints
Employees	<ul style="list-style-type: none"> • Tata CoC / Values implementation • Training • Communication by EC 	<ul style="list-style-type: none"> • Complaints • Act of misconduct • ESS feedback • Shrinkage • Insider Trading
Landlords/ Property Dealers	Contracts signed	Informal feedback
Brand Owners	<ul style="list-style-type: none"> • Communication 	Deviation from clause / contract terms
Customers	Operations and services offered	<ul style="list-style-type: none"> • CSS • Customer tracking thru' CFTS • Informal feedback

Trent Limited has nominated Location Ethics Counselor in Stores across the nation. Concerns at stores levels are first raised to the LEC and then escalated to the EC. Actions taken at locations are communicated to EC. All property dealings are carried out with the highest ethical standard.

The implementation of Tata CoC process is shown as follows:

Implementation of ethical process



Trent Limited monitors the effectiveness of the ethical behaviour at different levels using a strong feedback process. As an E&I this year it was decided to get the feedback from Vendors on ethical dealings and transparency.