



SUSTAINABILITY REPORT 2015-2016

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INTRODUCTION

Established in 1998 as part of the Tata Group, Trent Ltd. operates Westside, one of India's largest and fastest growing chains of retail stores.



The company has established 92 Westside departmental stores measuring 8,000-34,000 sqft in floor space across 53 cities. The Westside format offers a predominantly exclusive brands model across women's wear, menswear, kids' wear, footwear, lingerie, cosmetics, perfumes and handbags, household furniture and accessories. Well-designed interiors and prime locations enhance the customer's shopping experience.



In addition, Landmark, one of the largest books, toys, gaming & technology retail chains was acquired by Trent in 2005. Landmark sparked the trend of stocking curios & other gift items. What separates Landmark from other stores of its kind is the range and depth of its stock, i.e chocolates, magazines, bags & travel, sports & stationaries and many more.

Areas of Business:

- The core area of business of Trent Ltd is: a Retail chain of stores of fashion apparels, entertainment & leisure.
- The Westside format offers an exclusive range of its own branded apparel and continues to be the flagship business of the company.
- Landmark is a family entertainment format store with a focus on toys, adult and young adult books, sports-related merchandise, tech accessories, gaming and stationery.

SUSTAINABILITY

At Trent Limited, sustainability 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.

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 and activities during 2015-16 in support of the Global Compact's objectives. Our

commitment to sustainability drives our environmental endeavour, good corporate citizenship in our workplace, communities, the products and services we provide to customers.

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, provide decentralized training, and to provide opportunities of 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 take proactive steps towards a child-labour free society.
- In accordance with other Labour Laws, we seek to identify possible occupational hazards and promote in totality, the health and safety of our employees.

HUMAN RIGHTS PRINCIPLES

Assessment, Policy and Goals

OUR COMMITMENT

Trent Limited acknowledges that every single human being is entitled to enjoy his or her human rights without any distinction of 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 a set of standards & codes and adheres to them 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 promoting human rights:

Purpose

Upholding the Tata group belief, we at Trent are committed to improving the quality of life of the communities we serve. We do this by striving for leadership in the sectors we operate in.

Our practice of giving back to the society evokes trust among consumers, employees, shareholders and the community. We are committed to protecting this heritage of leadership with trust.

Core values

The Tata Group has always been driven by values. These values continue to direct the growth and business of Tata companies. The five core Tata values reinforce the way we do business at Trent.

They are as follows:

Integrity: We must conduct our business fairly, with honesty and transparency. Everything we do must stand the test of public scrutiny.

Understanding: We must be caring, show respect, compassion and humanity for our colleagues and customers around the world, and always work for the benefit of the communities we serve.

Excellence: We must constantly strive to achieve the highest possible standards in our day-to-day work and in the quality of the goods and services we provide.

Unity: We must work cohesively with our colleagues across the group and with our customers and partners around the world, building strong relationships based on tolerance, understanding and mutual cooperation.

Responsibility: We must continue to be responsible, sensitive to the countries, communities and environments in which we work, always ensuring that what comes from the people goes back to the people many times over.

Corporate Governance:

Our 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 Executive Directors. 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 by the Tata Business Excellence Model, a 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. 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 a 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.

The 25 Tata CoC principles in brief:

1. National Interest	14. Use of Tata Brand
2. Financial reporting and records	15. Group policies
3. Competition	16. Shareholders
4. Equal- opportunities employer	17. Ethical conduct
5. Gifts and Donations	18. Regulatory compliance
6. Government agencies	19. Concurrent employment
7. Political non- alignment	20. Conflict of Interest
8. Health, safety and environment	21. Security transactions and confidential information
9. Quality of products and services	22. Protecting company asset
10. Corporate citizenship	23. Citizenship
11. Corporation of Tata companies	24. Integrity of data furnished
12-13. Public representation of the company and the Group	25. Reporting concerns

The Company has adopted the Tata Code of Conduct for its Executive Directors, senior management personnel and other executives of the Company. The Company has also adopted the Code of Conduct for Non-Executive Directors of the Company. Both the Codes are posted on the website of the Company.

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 Audit Committee of the Company and make protective disclosure about the unethical behaviour, 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.

The Tata Code of Conduct 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 sections of the society).

In order to realize the same, we follow a 2 part process:

1. Selecting the Key Communities

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

The process of selecting the key communities is as follows:



⇒ India 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 and unemployed youth 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 and unemployed youth. We shall also use our assets and our expertise in the retail business to further the cause of such communities.

2. Deciding the Thrust areas and clearly outlining the Action Plans

- For Implementation
- For setting up a process to Measure and Review the Results

Goals related to human rights: To ensure that 100% of our employees undergo training as part of our Induction program

Implementation

All employees undergo a one day training program with intent to acclimatize the personnel with the Philosophy of the Tata Group, Vision, Mission and Values of Trent and the various policies and procedures of the company.

Measurement of outcomes

<u>Target Set</u>	<u>Results Achieved</u>
100% Employees	100% of the employees have been trained in respect to the aspects of values, vision and mission of the organization

Trent has framed and incorporated the Corporate Social Responsibility Policy under the framework and guidelines of the Companies Act, 2013 and Schedule 7 governing corporate social responsibility initiatives and focus areas. Successive CSR initiatives and projects shall now be implemented basis the Corporate Social Responsibility policy.

Based on materiality assessment, the following thrust areas namely Education, Employment, Employability, Health & Safety, Environment and furthering other relevant social endeavours have been identified.

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

Education

As part of our education initiative, we support NGOs by selling items like 'Diyas' with a theme 'Help a Child – Bring a Smile' during Diwali and 'Angels Tree' and Stars during Christmas to generate revenue to help poor children, with the proceeds being given to the NGOs that work in the areas of education & nutrition. For the year 2015-16, we are supporting 21 NGO projects, benefitting approximately 3000 children across India.

This year also witnessed a successful launch of the below mentioned projects:

- Education sponsorship programme
- School Library Project
- English Communication Project.

Education Sponsorship Programme:

This initiative aims at assisting students at National Institute of Fashion Technology (NIFT) - Mumbai by providing educational sponsorship, thus providing financial assistance to meritorious and deserving students belonging to the economically weaker sections, specific to Affirmative Action communities. This academic year 2015-16, Trent sponsored 4 eligible students.

School Library Project:

Trent Limited, under its Corporate Social Responsibility Programme had set up a total of 8 school libraries in English medium Government Municipal schools in Mumbai in 2014-15. Extending this programme in 2015-16, Trent supported 5 municipal school libraries in Delhi. This initiative is implemented in partnership with Room to Read India Trust, a public charitable trust that works in collaboration with communities and local governments across Asia and Africa to develop literacy skills and a habit of reading among primary school children. In the forthcoming year, we plan to scale this initiative across multiple cities across India.

English Communication Project:

This initiative aims at improving English Communication skills of students belonging to municipal schools between the age group of 13-16 years across Mumbai city. The project aims to make a difference in the lives of the students vis-à-vis fluency in their ability to communicate in English. The pilot batch is currently being implemented in Chembur Naka, Mumbai. This initiative is being implemented in partnership with Urmee Charitable Trust and Step Up Foundation, non-governmental organizations that work in collaboration with communities and local government schools. The project covers 150-200 students in the pilot batch.

Employment

750 individuals, which is 27% of the total workforce belonging to the Affirmative Action communities were employed within our organization, last year. This has been a result of our twin pronged strategy of working with NGOs having roots in the communities and our employability initiative.

Employability

In our endeavor to champion the cause of employability, Trent has been executing a self-designed initiative - "Saksham" with the objective of training underprivileged youth from the communities in a vocational course on 'Retail Operations' so as to enhance their employability skills and provide opportunities for employment.

The course includes a good mix of theory and practical so as to fully equip every aspirant with relevant skills, knowledge and attitude.

With the intention of making the above mentioned project sustainable and scalable, Trent has trained 20 trainers so far from the N.G.Os so far and has taken centre stage with regards to updating the trainers on a timely basis, providing certification, an on the job training provision and support in terms of providing employment opportunities.

In addition, commensurate to our requirements, we intend to employ as many of these aspirants within our organization. Relevant processes have been set to ensure smooth functioning of the above mentioned.

<u>Initiative</u>	<u>Beneficiaries</u>
Vocational Training on Retail Operations & English Communication Skills	Approximately 600 underprivileged youth from the communities till date

In regards to the above initiative, a process for implementing, monitoring & evaluation has been designed which is as follows:-

- Trent Limited will collaborate with N.G.Os to train the underprivileged youth.
- 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.Os
- 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.
- Trent Limited would provide certification to the trainers.
- The trainers from the N.G.O's would train underprivileged youth from nearby communities
- Trent Limited will retain the services of a professional from an educational institute to provide certification
- Trent Limited will arrange for store visits of the candidates enrolled in the retail course for enhancing the process of learning.
- Trent Limited would absorb the underprivileged youth in the organization commensurate to its requirements.
- Trent Limited would help the N.G.O's link with other organizations of the service industry so as to provide more job opportunities to the youth.
- Trent Limited will establish a network for sharing of best practices and concerns
- Trent Limited will develop audio - visual aids as a teaching technique for a better learning experience

Affirmative Action

Tata Group endorses affirmative action, an initiative relating to endeavours falling under the gamut of: Education, Employability, Employment and Entrepreneurship especially for personnel belonging to the Scheduled Caste and Scheduled Tribe categories.

As part of this initiative, Trent has provided employment to 750 people from the affirmative action communities. This translates to 27 % of Trent's employee base.

Volunteering

The leadership team regularly takes initiatives in areas of community development. Employees are encouraged to become members of the professional bodies and volunteer their time, talent and expertise. Senior leaders and employees from Trent Limited are constantly involved in educational activities with student groups from various educational institutions. In addition, Trent has initiated an Award Category for Volunteers who partake in the Corporate Sustainability initiatives.

This year, Trent also participated in the Tata Engage Group volunteering program initiated by the Tata group. Around a total of 800 volunteers across locations participated in this program, thereby contributing their time and skills. Volunteers conducted sessions on personality development and career building with the youth falling within the age group of 14-16 years at various government/municipal schools and training institutes run by local Ngo's.

This year, a new volunteering concept was initiated by the Tata group: ProEngage - a skill-based volunteering program that enables volunteers to lend their skills & expertise to non-profits and communities for capacity building in specialized functions like HR, Finance, Business Planning, Marketing etc.

Volunteering and contributing their skills and time for a project dedicatedly for a span of 2-6 months on a part-time basis. Trent has 4 volunteers as its Pro Engagers.

Volunteering has been categorized broadly as follows:

Volunteering at our Stores (Stores Staff): Aspirants from NGOs are encouraged to visit the stores as part of the vocational training initiative which provides a unique opportunity for visual and tactical learning

Volunteering with NGO's as Guest Lecturers: The staff from our corporate office/ stores visit NGOs to impart knowledge and skills to the aspirants from the organization.

Aid to the society

Trent Limited collaborates with various NGOs working with Children and blood donation, donation of clothes, books, toys etc. on a periodic basis. Volunteers from within the organization also form part of these donation drives and spend quality time with these beneficiaries through various activities.

Trent has also collaborated with a Hospital - Guru Nanak Trust and donates unused medicines that are subsequently used by the doctors from the trust to treat the sick and afflicted hailing from underprivileged communities. For the same, Trent encourages their employees and customers to donate unused medicines which are collected through special medicine drop-boxes that are placed at the Corporate Office and at the stores.

Health and Safety

Safety Commitment-

Safe practices being a cultural aspect of one's behavior, Trent's SLT demonstrates their commitment to Safety largely through the softer aspects of communication and training. Constant reinforcement through regular mailers, audits, review meets and deployment of planned Safety initiatives, helps in increasing the acceptance of safety policies.

Safety Policy -

The organizational Health and Safety Policy has been framed keeping in mind the health and safety needs of all stakeholders, and guiding principles from the Tata Safety and Health Management System. The Apex Safety Committee (led by the leadership team) and Safety process owners ensure regular conceptualization, deployment, review, measurement and improvement of safety processes and policies. The Apex Safety Committee has propagated a Zero Tolerance philosophy for all Safety measures.

Health & Safety Policy	
Our Belief:	The Health and Safety of all our customers, employees & all people who work in and with the Trent Group is our number one priority.
Our Principles:	<ul style="list-style-type: none">• All injuries and work-related illness can and must be prevented. We all have a duty to prevent harm. No one should be injured as a result of our operations.• All employees and contractors are responsible for their customers, their own health and safety and that of their colleagues, with management accountable. We all have a role to play in managing risk in our operations. Management has additional responsibilities to demonstrate leadership and high standards in health and safety, and is ultimately accountable.• Employee engagement and training is essential. Everyone must be involved in health and safety every day and have the opportunity to contribute positively to a safer and healthier workplace. Employees must know how to keep themselves and those around them safe. They should receive suitable training on the hazards they face and the control measures to be applied.• Working safely is a condition of employment for all employees and contractors. A commitment to work safely can only be demonstrated by our actions ... or inactions.• Excellence in health and safety drives excellent business results. Without a healthy and safe operation there can be no business.• Safety and health is integrated into all our business management systems and processes. Sound business decisions cannot be made without genuine consideration for customers, employees & all peoples health and safety who work in or with Trent.
Adopted from TATA STEEL	

Safety Infrastructure –

Safety Infrastructure at Trent	Trent House	Stores	DC	Pune
Fire Alarm System	Y	Y	Y	Y
Sprinklers at all floors	Y	Y	NA	NA
Fire extinguisher every 1400 sq. ft.	Y	Y	Y	Y
CCTV surveillance	Y	Y	Y	NA
Electronic access-controlled entry and exit points	Y	NA	NA	Y
Fire exit doors - push-bar & hooter system	Y	Y	NA	NA

Safety visibility signage and hatchings	Y	Y	Y	Y
24x7 physical security	Y	Y	Y	Y
Refuge area	Y	Y	Y	Y
Emergency Exit Plans, Emergency wardens & Firefighters	Y	Y	Y	Y
Assembly Points	Y	Y	Y	Y
Stretchers and wheelchairs for evacuation for those needing special assistance	Y	Y	NA	NA
Safety Hotline and iServe issue reporting & resolution	Y	Y	NA	NA
First Aid Box	Y	Y	Y	Y
Doctor-on-call	Y	NA	NA	NA

Safety Communication-

Stakeholder	Safety Communication
Customer	Prominent neon signs to indicate emergency exits Emergency exit plan on every floor Signs for Customer Service Desk for any other assistance Display of Fire extinguisher guidelines Evacuation drills Trained Fire wardens and systems in conjunction with mall
Visitors to offices	Emergency guidelines in all meeting rooms Safety Posters Clear evacuation signage
Employees (including contractors)	Safety pause 4-S Posters Safety module at induction Town Hall Meetings Bi-Annual Managers Meet AMO meet On-the Job Training Safety & First Aid Training Process notes Pathfinder communication Safety signage Safety Manual Health & Safety notice board Safety Alert Boxes, iServe, Safety Hotline for issue logging & resolution
Vendors	Safety criteria as part of vendor evaluation Safety pause at the annual partner meet Health, Safety, Security, Social & Requirements

Safety Initiatives -

Every year, Safety focus areas are defined, and initiatives are planned and deployed around these areas. This year, the focus areas have been defined as Women's Safety, Travel Safety, Electrical Safety, Project Site Safety, and Health & Wellness.

Process & Policies

Trent's Safety processes encompass and address the following elements:

- Inclusion in and alignment to Organizational Strategy
- Identification and mitigation of Key Hazards & Risks
- Crisis Management & Emergency Response
- Employee Health Insurance
- Process & Equipment Safety
- Project Management
- Supply Chain Safety
- Contractor Safety
- Work Permit System
- Crisis Management & Emergency Response
- Office and Road Safety

LABOUR PRINCIPLES

Assessment, Policy, Goals, Implementation and Measurement of outcomes

OUR COMMITMENT

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 to 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.

The Tata Code of Conduct emphasizes corporate ethical behavior for employees & 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

Social Compliance

Trent has embarked upon an initiative with vendors on Social Compliance. The objective being, to engage with them in our fight against Child Labor, Forced Labor, Discrimination/ Harassment and to promote Health and Safety thereby aiming at improving the quality of life. The idea was to go beyond the boundary of business and further 'human values' along with the vendor fraternity.

Social compliance Audits: The company institutes periodic audits on its suppliers, to identify opportunities to enhance the quality of social compliance. The audit is based on ILO conventions mentioned below-

Trent Limited has engaged Global Agency Intertek to Audit Vendors for Social Compliance. These are Standards on which all International Retailers evaluate their Vendors. Intertek has given their action plan for getting Vendors Socially Compliant which Trent limited will implement as basic requirements. Many vendors are being partnered which are holding certification on Social Compliance i.e BSCI and SEDEX.

Forced Labour	Child Labour	Wages	Discrimination
Working Hours	Health & Safety	Freedom of Association	Home workers

Equal opportunity employer

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.”

The company adheres to its commitment towards being an equal opportunity employer & recruits & promotes talent on merit, with no discrimination against any caste, creed, race, colour, age, region, religion etc. In addition to this the company promotes diversity of talent. The organization has consciously added international and diverse experience across cultures.

During the last few years, Trent has gone beyond geographical boundaries to induct diverse and best in class talent. Trent has also initiated a focus on improving gender diversity and women enablement at stores, at managerial as well as associate level. There are 33% of women colleagues at sales associate levels across stores and 11% women at managerial level across stores. To continue efforts in same direction, a scholarship program in collaboration with NIFT (National Institute of Fashion Technology), wherein Trent has initiated internship opportunities to students on merit base from affirmative action communities, with which may also lead to subsequent job offers. The company understands that cultural diversity is important to address the regional preferences of the customers. Similarly, most of the associates and officers are recruited from the city in which the store is located. Thereby also providing equal opportunity and displaying positive discrimination in recruitment from the socially disadvantaged sections of the society.

Employee Welfare Benefits

Officers, Associates	Managerial
ESI, PF, Employee Deposit Linked Insurance –EDLI , Education allowance, Medical reimbursements	PF, Gratuity, Health & Accident insurance, Medical reimbursement , Mediclaime policy

ENVIRONMENTAL PRINCIPLES

Assessment, Policy, Goals, Implementation and Measurement of outcomes

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"> • Standardise Fits • QC checks upgraded from time to time – Fabric Tests and Garment Tests for 3 washes • Store probe for merchandise recall • Introduction of Inline inspection – Reduce last minute rejections • Reduction in use of carry bags due to government and RAI – mandated sale of plastic bags • Consolidation of fabrics across Categories and nominating fabric suppliers • Vendor Consolidation for consistent delivery and Quality • Minimize Cost of Product in effect - Margin Increase • Reduce Mind to Market lead times • Implementation of Critical Path for ensuring appropriate lead time product wise. • Basic Social Compliance of Vendors

Target & measures to mitigate impact/ risks

	<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 Accidents 	<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

- **Carbon Footprint- Assessment and Abatement**

As part of furthering a Culture for Energy and Environment Conservation by walking the talk, Trent under the aegis of the Tata Group has completed a 'Carbon Footprint- Assessment and Abatement exercise'. The aim being, "To move towards a carbon neutral platform by measuring the Carbon Emission Performance of the Organization, assessing the future risks and conceiving possible Techno-Financial measures to reduce the Carbon Liabilities.

A detailed roadmap has been created to reduce overall energy consumption and promote the go-green agenda.

We have the 2020 Carbon road map in place to reduce the emissions of existing stores by 30% by 2020 and build new stores with 25-30% less carbon foot print.

Accordingly, Carbon action plan phase-I, II, III and sustainable project guidelines are in place and implementing the action plans and project guidelines, we will be able to reduce the cumulative carbon foot print by 29.01% of 2008-09 baseline against targeted 24.5% for the financial year 2015-16.

Till date we have achieved an annual savings of 3.30 lakh kWh in the financial year 2015-16 which corresponds to an equivalent carbon emission reduction of 417.8 TCO₂ per year. The cumulative CO₂ emission reduction from the baseline year is 7,663 TCO₂.

The major contributing factors to reduction in carbon emission in the financial year 2015-16 is due to the installation and retrofitting of LEDs in the stores which account to more than 25% energy savings compared to the stores with metal halide and halogen lamps. The other major contributing factor in emission reduction is the use of energy saving equipment like the VFDs for AHUs, energy efficient chillers and improved operational efficiency.

ANTI-CORRUPTION PRINCIPLES

Assessment, Policy, Goals, Implementation and Measurement of outcomes

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. 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 behavior 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	<ul style="list-style-type: none">• VSS feedback• Complaints
Employees	<ul style="list-style-type: none">• Tata CoC / Values implementation• Training• Communication by EC	<ul style="list-style-type: none">• Complaints• Protected declarations• Act of misconduct• ESS feedback• Shrinkage• Insider Trading
Landlords/ Property Dealers	Contracts signed	Informal feedback

Brand Owners	• Communication	Deviation from clause / contract terms
Customers	Operations and services offered	<ul style="list-style-type: none"> • CSS • Customer tracking thru' CFTS • Informal feedback • Customer Feedback Management System (currently being rolled out)

The ethical environment is reinforced by the following practices.

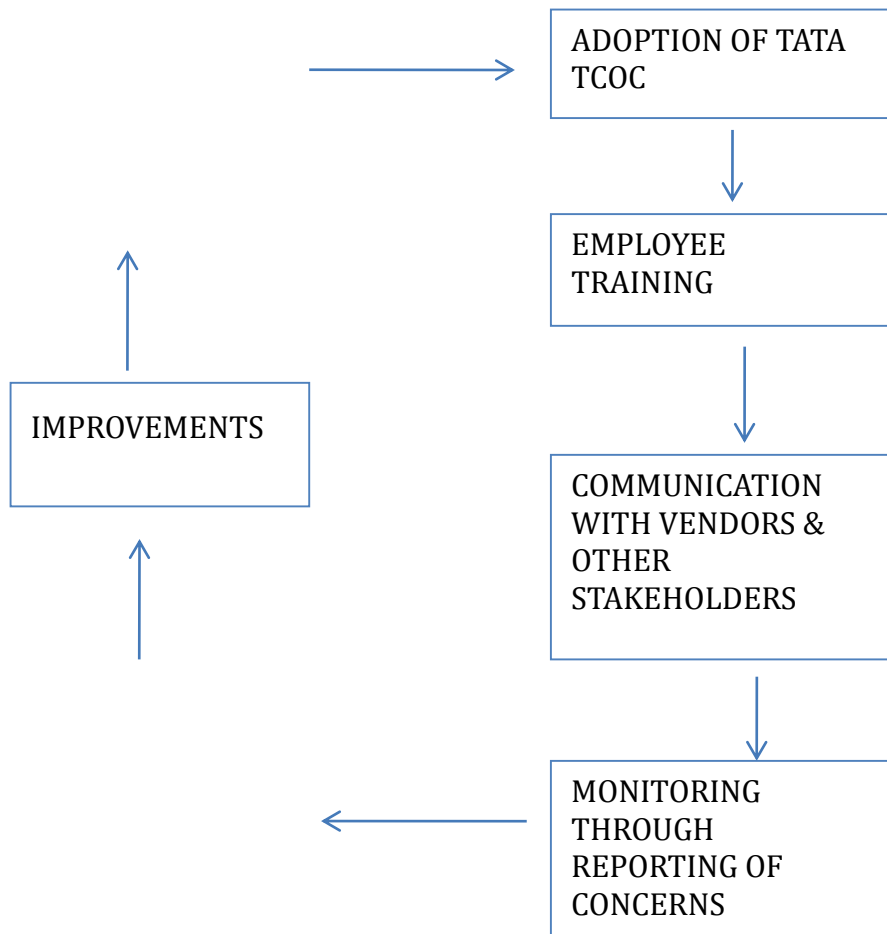
- Each employee is explained the TCoC at the time of appointment, and is a signatory to the code.
- All suppliers sign Purchase Orders which mandate adherence to the TCoC.
- Training programs and leadership briefings are done to increase awareness of the code.
- A corporate ethics counselor who, along with local counselors at offices and stores, act as listening posts and assist in resolution of concerns. Each unit has a lady ethics counselor to make employees comfortable.
- A monthly ethics and incidents reports is submitted to the Chief Ethics Counsellor by all stores. He analyses the report and takes necessary action, including escalating to SLT and Board wherever required.
- The TCoC is prominently displayed in all employee operating areas at Stores and Offices.
- Employees are actively encouraged by the leadership to understand the code and to contact their Local Ethics Counsellors to report any concerns.
- An email account to capture employee concerns.
- Employee & Vendor surveys to assess ethical environment.
- The Tata Group MBE documents guide the process of concern resolution.
- Annual corporate compliance report to the Group.

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 senior leaders stand the test of scrutiny in every situation in which they lead the business transactions of the company, by virtue of an environment of openness and equal participation. Their words, actions and behaviors are visible to other colleagues in the organization, and are subject to evaluation in the periodic employee surveys. The senior leaders have established a mechanism consisting of a Chief Ethics Counselor reporting to the Ethics Committee of the Board that that reviews and addresses breaches in ethical conduct within the organization, to provide recourse to anyone wanting to report breaches of the code. The senior leaders communicate the Tata Code of Conduct and organizational Values during their employee interactions and meetings with stake holders (E.g.: Vendor meets).

The implementation of Tata CoC process is as follows:

Implementation of ethical process



Trent Limited monitors the effectiveness of the ethical behavior 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.

ANNEXURE 1



CORPORATE SOCIAL RESPONSIBILITY POLICY

Trent outlines its Corporate Sustainability policy that integrates economic progress and social commitment. It aspires to always fuse its business values, cultural pillars and operating principles to exceed the expectations of our customers, employees, partners, investors, communities and wider society. Our core values form an integral part of our corporate sustainability programmes and aim towards responsibly improving the quality of life of our stakeholders.

Trent's CSR policy will be followed and implemented basis the following guidelines:

- ❖ The requirements of Clause 135 of the Companies Act, 2013 and the corresponding Rules.
- ❖ Guidelines and activities listed under Schedule VII of the Companies Act, 2013.
- ❖ In coherence with the overall long-term Tata group CSR strategy and values.
- ❖ Any surpluses arising out of CSR projects or programmes or activities shall not form a part of the business profits of a company.
- ❖ Effectively respond to any disasters, depending upon where they occur and our own ability to respond meaningfully.

Philip Auld
Managing Director

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ANNEXURE 2



AFFIRMATIVE ACTION POLICY

Trent encourages and recognizes that equal opportunity employment has positive impact on organizational performance. Trent will ensure that all its people processes provide equal employment opportunity to the socially disadvantaged.

Trent will:

- ❖ Volunteer its people development initiatives to the extent possible to enhance employability of this section of society.
- ❖ Facilitate development of entrepreneurship among the socially disadvantaged by coaching, counseling and providing opportunity to be part of the supply chain management based on merit.
- ❖ Encourage its vendors/business associates to be a partner in this initiative.
- ❖ Maintain records on Affirmative Action.
- ❖ Be open to share learning and experience on Affirmative Action with other organizations who desire to incorporate the Affirmative Action policy as part of the business.

Philip Auld
Managing Director

September 2015

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