



SUSTAINABILITY REPORT 2017-2018

CONTENTS

INTRODUCTION

SUSTAINABILITY

HUMAN RIGHTS PRINCIPLES

LABOUR PRINCIPLES

ENVIRONMENTAL PRINCIPLES

ANTI-CORRUPTION PRINCIPLES

ANNEXURES

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 129 Westside departmental stores measuring 8,000-34,000 sqft in floor space in more than 64 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.



In 2016 Trent forayed into the value segment of fashion through its brand Zudio. The value format – Zudio offers consumers with an awesome mix of fashionable yet affordable ranges with its 6 stores

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.
- Zudio is the value segment of fashion a with 6 standalone department stores with affordable range of apparels

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 2017-18 in support of the Global Compact's objectives. Our commitment to sustainability drives our environmental endeavor, 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, and ethical in our conduct; everything we do must stand the test of public scrutiny.
- **Excellence:** We will be passionate about achieving the highest standards of quality in our day-to-day work and in the quality of the goods & services we provide and always promoting meritocracy.
- **Unity:** We will invest in our people and partners, enable continuous learning, and build caring and collaborative relationships based on trust, tolerance, understanding and mutual respect.
- **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. We will integrate environmental and social principles in our businesses ensuring that what comes from the people goes back to the people many times over.
- **Pioneering:** We will be bold and agile, courageously taking on challenges, using deep customer insight to develop innovative solutions.

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 (TCoC) for its employees including the Executive Directors. In addition, the Company has adopted a Code of Conduct for its Non-Executive Directors. Along with the Tata Code of Conduct, the organization also reinforces the Tata Business Excellence Model (TBEM), via two defined policies, i.e 1. Prevention of Insider Training and 2. Whistle Blower Policy, to establish the core business values and principles. 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 (TCoC) which serves as a guide on the values, ethics and business principles. It is a set of 21 principles which enshrine the human rights principles, adherence to labour standards, commitment towards environment protection and anti-corruption. TCoC has been developed to ensure a high standard of corporate and personal behavior on which the Tata Group's reputation and respectability has been built over the past years.

Trent Limited adheres to Tata Code of Conduct (TCoC) 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 21 Tata Code of Conduct (TCoC) principles in brief:

1. Equal Opportunity employer	11. Conflicts of interest
2. Dignity & respect	12. Products and services (Fair & Quality)
3. Human Rights	13. Export controls and trade sanctions
4. Bribery and corruption	14. Fair Competition
5. Gifts and hospitality	15. Dealings with customers
6. Freedom of association	16. Communities (Giving back to society)
7. Working outside employment with us(Dual Employment)	17. The Environment (Sustainability)
8. Integrity of information and assets	18. Political non – Alignment
9. Insider trading	19. Government engagement
10. Prohibited Drugs & Substances	20. Raising Concerns
	21. Accountability

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 annex 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 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. There is a dedicated third party Ethics Helpline number, to facilitate the logging in of the disclosures.

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 an intent to acclimatize them 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

SOCIAL POLICY
<p>⇒ 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.</p> <p>⇒ 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.</p>

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.”

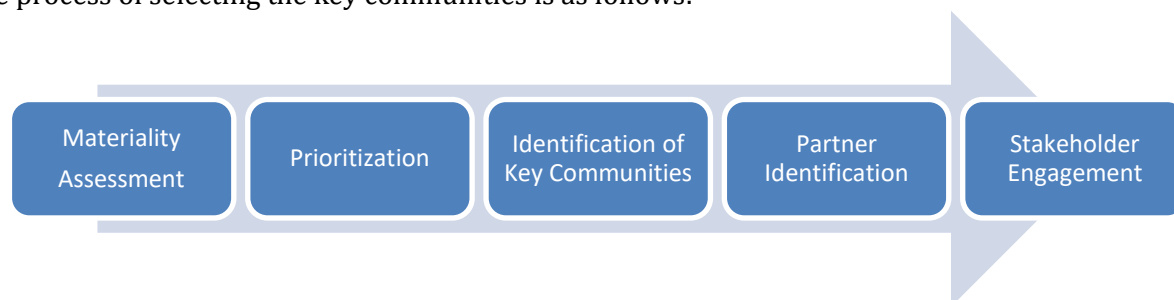
Under Corporate Social Responsibility, Trent continues to strive and address the concerns of its employees, stakeholders and the community (especially the underprivileged sections of the society).

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:



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

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

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 endeavors 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 2017-18, we are supporting 25 NGO projects, benefitting approximately 4000 children across India.

The Board array of the Trent Social Responsibility are as follows

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 2017-18, till now Trent has sponsored 8 eligible students.

School Library Project

Education: Infrastructural Support: As part of Trent's education initiative which works with different segment of students. Trent now support total 21 libraries in municipal schools in Mumbai, Delhi, Pune and Thane .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. A total of 8358 beneficiaries have been positively impacted through this Initiative since 2014.

English Communication Project in BMC Schools & St. Xavier's, College

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 student's vis-à-vis fluency in their ability to communicate in English. This year Trent Supported 6 schools with an outcome of 300 beneficiaries. This initiative is being implemented in partnership with Salaam Bombay Foundation and Step-Up Foundation, non-governmental organizations that work in collaboration with communities and local government schools.

English and Business Communication Skills training have been conducted in St. Xavier's, college especially for the Department of commerce, Evening College, we targeted to impact 470 students from 1st & 2nd Year of their Course

Employment

1352 individuals, which is 23.23% 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: Vocational Skills for Youth

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. With the ongoing partnership with Tata STRIVE we have supported 5 Retail Lab centers for the Retail training to ensure quality training and employability enhancement for the youth in Mumbai, Pune, Mohali, Hyderabad and Bhubaneshwar and also to upsurge and support especially young girls who enrolled from distant locations to pursue the vocational retail trainings we have set-up the hostel facility which catered to 250 trainees in retail

<u>Initiative</u>	<u>Beneficiaries</u>
Vocational Training on Retail Operations in 5 Retail Labs	Approximately 1880 underprivileged youth from the communities till date

Affirmative Action

Tata Group endorses affirmative action, an initiative relating to endeavors 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 1352 people from the affirmative action communities. This translates to 23.23 % 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 in the group forum. Senior leaders and employees from Trent Limited are constantly involved in educational activities with student groups from various educational institutions by sharing their expert view and experience, this creating impact in society at large

This year, Trent employees actively participated in the Tata Engage Group volunteering program initiated by the Tata group. Around a total of 4000 volunteers across locations participated in this program, thereby contributing their time and skills. At the Tata Sustainability Group, Trent won for the highest no of volunteering hours award, i.e 48172 man hours by our employee volunteers, in Tata Volunteering Week 8 (5th Sept - 6th October, 2017) in the medium size company category.

Pro- Engage 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 awarded more than 15 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-

The leadership team at Trent creates focus on safety by adapting the guiding principles of the Tata Group Health and Safety Management System into a set of policies and initiatives suitable to the retail industry. Adequate Resources are allocated to drive these initiatives. SLT has adopted Give Me 5! (G5) as a prioritized theme for Safety at Trent for all stakeholders. Give Me 5! Is a set of promises on Safety between the Leadership team and the employees of Trent.



Based on the risks associated in the Retail Industry; Woman Safety, Health & Wellness, Project Site Safety, Electrical Safety and Travel Safety were prioritized and this two-way promise on Safety was launched by the MD in April 2016.

An **Apex Safety committee** consisting of the SLT meets once a month to review the **Safety KPIs** and ATRs. All major decisions on Safety are taken in this meeting. Across Trent Locations safety owners have been appointed.

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.

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:

- **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.

TRENT
LIMITED

Adopted from TATA STEEL

Safety Infrastructure –

G5 Head	Safety Infrastructure at Trent	HO	Stores	DC	Pune	Sing offices
Woman's Safety	CCTV surveillance	Y	Y	Y	N	Y
	24x7 physical security	Y	Y	Y	Y	Y
	Electronic access	Y	N A	Y	N	Y
Travel safety	Communication deployment	Y	Y	Y	Y	Y
Health & wellness	Ergonomic cash tills	N A	Y	N A	N A	NA
	First Aid Box	Y	Y	Y	Y	Y
	Tie up with nearby hospitals	Y	Y	Y	Y	Y
Electrical (Fire) safety & Emergency Response	Fire Alarm System	Y	Y	Y	Y	N
	Fire extinguishers	Y	Y	Y	Y	Y
	Sprinklers at all floors	Y	Y	Y	N A	NA
	Fire exit doors - push-bar & hooter system	Y	Y	Y	Y	N
	Safety visibility signage and hatchings	Y	Y	Y	Y	Y
	Emergency Exit Plans, Emergency wardens & Firefighters	Y	Y	Y	Y	N
	Refuge area	Y	Y	N A	N A	Y
	Assembly Points	Y	Y	Y	Y	Y
	Stretchers and wheelchairs for evacuation for those needing special assistance	Y	Y	Y	Y	N
	Safety Hotline and iServe issue reporting & resolution	Y	Y	Y	Y	Y
Project Safety	Safety Alert card system	Y	Y	Y	Y	N
	PPEs for works	Y	Y	Y	Y	Y

Fig.S.6b: Safety Infrastructure at Trent bucketed as per G5!

Safety Communication-

Forum / Channel	Mode of Communication	Frequency	Parameters	Audience
Town Hall Safety Contact	One way	Monthly	Promotion of upcoming H&S activity, Safety Quiz	Employees
Safety event invites	One way	Quarterly	Importance and agenda of the Safety event	Employees
Safety Committee meeting	Two way	Monthly	KPI review	Apex Committee & Safety Owners
ABCD Meeting	Two way	Weekly	Safety KPI review, Activity planning and milestone review	Safety Owners
Store Briefing	Two way	Weekly	Safety findings, awareness	Store Staff
Engagement Conclave	One way	Annual	Safety Rewards	Employees
SQT Meet	One way	Annual	Safety awareness Module	Category Teams
BAMM	Two Way	Bi-Annual	KPI review and training	Store Managers
AMO Meet	Two Way	Bi-Annual	KPI review and training	Asst Store Managers
Times of Trent	One Way	Quarterly	G5 and other safety updates	Employees
In-Store signage's & Notice boards	One Way	Ongoing	Safety information & Emergency response	Customers & Store Employees
Back office notice boards & Posters	One Way	Ongoing	Safety information & Emergency response	Store Employees
In-Office signage's & Notice boards	One Way	Ongoing	Safety information & Emergency response	Visitors and Office Employees
Safety Communication at Trent				

Safety Initiatives	Description
Management & Supervisor Commitment	<ul style="list-style-type: none"> Leading evacuations, participating in audits and by providing time and resources & Budgets
Safety Processes, Training & Communication	<ul style="list-style-type: none"> Safety audit, reporting and resolution mechanisms. Training and Safety communication from SLT and Safety Owners 2-wheeler safety campaign to urge store staff to wear helmets & follow road safety precautions ISI quality spare helmets provided at store
Workforce involvement	<ul style="list-style-type: none"> Give Me 5! Safety promises from and to Employees – transfer of ownership

	<ul style="list-style-type: none"> • Safety Pause at meetings, discussions and addressing of employee voices related to safety during Town Hall • Structured feedback and improvement ideas for Safety infrastructure and processes during BAMB • Fit and Fun Health events for employees • Health Tie up with Fitness experts as options for interested employees • Employees took the message of Home and Road safety to the community by in TVW 2017(16000 man hrs.)
Reporting, Review & Rewards	<ul style="list-style-type: none"> • Employees are encouraged to report safety observations and feedback via iServe • Safety hotline and Safety Alert card is present at all locations where no iServe access • Quarterly internal audits feeds into iServe • Safety KPIs are reviewed at forums explained in Fig.S.20 • Safety champions are recognized through awards as explained in ig.S.14.
Organizational Learning	<ul style="list-style-type: none"> • Best practices emulation • Sharing of Safety dashboard and Root Cause Analysis results • Trent's Promising Practice on Building Road Safety Culture was published on Edge Portal (Fig.S.11)

Safety Initiatives –

Process & Policies

Risks	Processes & Policies
Women's Safety Give Me 5!	<ul style="list-style-type: none"> • Certification course on Women Safety for all lady employees • POSH Policy and POSH Committee in place • In case of late hours – ladies chaperoned home/ safe transport provided • Pepper Spray given to all Women employees for Women's Day
Travel Safety Give Me 5!	<ul style="list-style-type: none"> • Travel Policy tweaked to include cab service at late hours • Two wheeler Safety Poster Campaign and online training module • Colleague's Video Messages of personal accident experience • Spare Helmet at stores for colleagues who forget to get their own • Defensive driving lessons for Chauffeurs • Chaperoning (ladies) / Shuttle service / Cab booking for odd hour travel
Electrical Safety Give Me 5!	<ul style="list-style-type: none"> • Dedicated Maintenance Department manages all equipment • Regional maintenance teams viz store and cluster maintenance officers reporting into Regional Maintenance Managers with regional budget allocations • Online issue management portal, iServe • SLA led resolution tracked- weekly dashboard published and reviewed by the SLT • Equipment AMC with vendor + tracker to up alerts on upcoming maintenance activities • Daily Safety Walks and Quarterly Internal Safety Audits • Annual External Electrical Audits and Thermography • Major issues identified discussed in the Apex Safety Committee meeting

	<ul style="list-style-type: none"> • SLA led closure of issues identified
Project Safety Give Me 5!	<ul style="list-style-type: none"> • Store/office building received from builder only after the building Safety Infrastructure is complete as per Developer scope • Non-compliance on Safety Checklist leads to rejection of property by the Property Committee • Safety infrastructure standards followed at project • Safety measures are taken during fit-out stage and a Work Permit system is used to undertake complex works such as working at heights and electrical work • Safety incidents at the project sites reported through iServe special bucket • At handover, operations team inspects the store - identifies and uploads a Safety snag list- to be resolved before store opening
Health & Wellness Give Me 5!	<ul style="list-style-type: none"> • Trent has engaged its office employees in a series of Fitness activities that are branded as G5 Fit and Fun-- Yoga, Zumba, Functional fitness etc • Quarterly Health Talks • Fit & Fun Sports- Cricket, TT, carom, Badminton • Nutritionist intervention- Health Breakfast , Healthy menu in cafeteria • Ergonomics @ work – Cashiers, IMT, Office Staff
Supply Chain Safety	<ul style="list-style-type: none"> • During Supplier Selection- inspection to evaluate Safety measures in the vendor's premises • Contract signed only if Safety norms are met – Fire Prevention systems, Fire exit ,Emergency exit plan, First Aid Box & First Aiders, Fire Department NOC, Needle Detector , Broken Needle Policy • Safety infrastructure as per Trent standards is ensured at the warehouse at Pune and Vapi
Contractor Safety	<ul style="list-style-type: none"> • Contracted staff (Housekeeping & Security roles in offices, warehouses and stores) trained by Agency on Safety Awareness quarterly • Training customized as per Trent's requirement • The contract staff like consultants working in various other line functions attend all the safety trainings • Contractor staff encouraged to participate in the G5 initiatives and contribute through the iServe Safety reporting. • Work permit system available for contract staff coming to Trent premises for works
Office Safety	<ul style="list-style-type: none"> • Basic Hygiene- Required illumination, Ventilation, Good Housekeeping, Ample Desk Space, Passageways free of clutter • Infrastructure - Safety Infrastructure, iServe online portal for issue logging, Trained Emergency wardens, Emergency Exit plans
Emergency Preparedness	<ul style="list-style-type: none"> • Induction training & Emergency Drills • Emergency Wardens and Infrastructure

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, and 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: Trent has implemented process for partnering with Vendors who holds Social Compliance on Global standards and have valid certification i.e. BSCI, SEDEX etc. These are audited on regular Basis of Yearly / 2 years to retain validity of certification.

In addition to above – to support existing small Vendors - 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 has implemented as basic requirements.

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

Equal opportunity employer

Trent Limited adheres to the TCoC 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 and adheres to POSH

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 focuses on having gender diversity across all stores, at all levels. There are 38.05% of women colleagues at sales associate levels across stores and 14.91% 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 absorbs interns 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 VM allowances for store VM, IMT, Washing allowances	PF, Gratuity, Health & Accident insurance, Medical reimbursement , Medicl aim policy, AHRA

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 TCoC 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.

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 Code of Conduct (TCOC)

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 Sustainability 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 the emissions of existing stores by 30% of baseline emissions by 2020 and also build new stores with 25-30% less carbon foot print using the latest energy efficient technologies by design.

In line with the Carbon emission reduction roadmap, an Environmental Sustainability policy has been created with the objective of sensitizing the business impacts of environment and incorporating relevant sustainable measures to reduce the environment footprint as a whole.

As per the Carbon Footprint road map 2020, the target reduction for the year 2017-18 is 28.5% reduction of carbon emissions compared to the baseline year of 2007-08. Against the initial target, we have achieved a cumulative reduction of 31.25% till date.

We have achieved an annual savings of 2.18 lakh kWh in the financial year 2017-18 which corresponds to an equivalent carbon emission reduction of 276.86 TCO₂ per year. The cumulative CO₂ emission reduction from the baseline year is 8,129 TCO₂. The specific carbon footprint (kg CO₂/sq.ft/year) also reduced from 31.17 in 2008-09 to 14.39 in 2017-18

The major contributing factors to reduction in carbon emission for new stores in the financial year 2017-18 is mainly due to the conscious incorporation of energy efficiency by design. Few energy efficient strategies in new stores by design include use of Energy efficient LED fixtures by design which not only have high burning hours but also consume 25-30% lower energy compared to the normal CDMT lights, installation of energy saving equipment like VFDs for AHUs and pumps, Energy Efficient chillers by design etc.

Similarly, for the existing stores, the retrofitting of conventional lighting to LEDs account for more than 25% energy savings. Also, few other major contributing factor in emission reduction in existing stores are the tuning of energy saving equipment like the VFDs for AHUs, implementation of automatic sensors for escalators and improved operational efficiency.

ANTI-CORRUPTION PRINCIPLES

Assessment, Policy, Goals, Implementation and Measurement of outcomes

Trent has adopted an Anti- Bribery & Corruption Policy. The purpose of this Anti- Bribery & Corruption Policy ("ABAC Policy") is to ensure that our company sets up adequate procedures in order to prevent our company's involvement in any activity relating to bribery, facilitation payments, or corruption, even where the involvement may be unintentional. It requires employees, directors, officers of the company and third parties subject to this ABAC Policy to recognize questionable transactions, behavior or conduct, and to take steps to record, comply and follow procedures set in place to deal with such behavior or conduct.

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 TCoC 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 favors 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 behavior 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 behavior is reinforced by adoption of the TCoC, 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 Code of Conduct	VSS feedback <ul style="list-style-type: none">• Complaints

Employees	<ul style="list-style-type: none"> • TCoC / Values implementation • Training • Communication by EC • Concern handling 	<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	<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 • Customer Feedback Management System

The ethical environment is reinforced by the following practices.

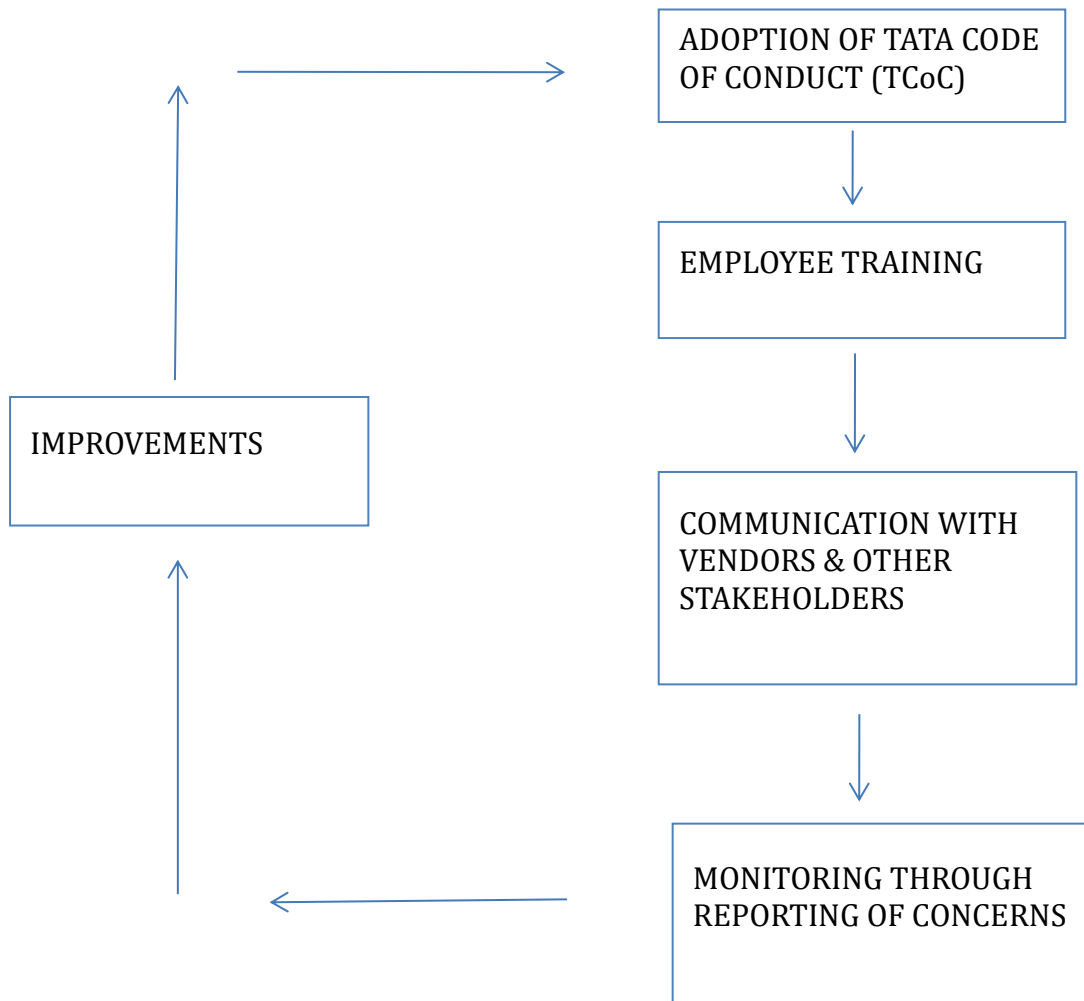
- Each employee is explained the TCoC at the time of appointment, and is a signatory to the code.
- All suppliers sign Purchase Orders which mandate adherence to the TCoC.
- Training programs and leadership briefings are done to increase awareness of the code.
- A corporate ethics counselor who, along 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/ She 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.
- An independent third party helpline is set up to capture all concerns.
- 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 each of our 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 TCoC 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. The company strongly believes in that businesses should conduct and govern themselves with ethics, transparency and accountability.

Any concerns or information related to above, please feel to get in touch with the Chief Ethics Counsellor (CEC), on the mail: ethics@trent-tata.com

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

REGISTERED OFFICE : BOMBAY HOUSE, 24, HOME MODY STREET, MUMBAI - 400 001. TEL: (91-22) 6666 8282 FAX : (91-22) 2204 2081

CORPORATE OFFICE : TRENT HOUSE, G-BLOCK, PLOT NO. C-60, BESIDE CITI BANK, BANDRA-KURLA COMPLEX, BANDRA (EAST),
MUMBAI - 400 051. TEL: (91-22) 6700 9000 FAX : (91-22) 6700 8100
Email id - mywestside@trent-tata.com Website - www.mywestside.com CIN - L24240MH1952PLC008951

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

REGISTERED OFFICE : BOMBAY HOUSE, 24, HOMI MODY STREET, MUMBAI - 400 001. TEL : (91-22) 6665 6262 FAX : (91-22) 2204 2081

CORPORATE OFFICE : TRENT HOUSE, G-BLOCK, PLOT NO. C-60, BESIDE CITI BANK, BANDRA-KURLA COMPLEX, BANDRA (EAST),
MUMBAI - 400 051. TEL : (91-22) 6700 9000 FAX : (91-22) 6700 8100

Email : corporate@trent.co.in Website : www.trent.co.in CIN : L24240MH1989DL000854

Contact us

Jerrymon Babu/ Neha Pandey
Corporate Social Responsibility

Direct: (022) 6700 9093/ 8056

Email ID: jerrymon.babu@trent-tata.com/ neha.pandey@trent-tata.com