



## TRENT VENDOR CODE OF CONDUCT

The Vendor Code of Conduct (VCoC) provides the foundation for continuous engagement with them and for dialogue on their ethical, social, and environmental performance. Trent VCoC is an extension of the Tata Code of Conduct (TCoC) that outlines expectations regarding compliance with applicable laws, respect for labour and human rights, environmental management, community engagement, and ethical business conduct. It is an integral part of the relationship and part of all contracts with the Vendors.

### **Scope of VCoC:**

Vendors are the external partners and entities or suppliers with whom Trent directly engages in business relationships to source various finished products. These vendors can include, fashion suppliers, and manufacturers.

### **Commitment to Vendors:**

Trent Limited's commitments to Vendors:

- **Respect:** Conduct business with Vendors in a fair, objective, transparent and professional manner, and treat vendor's employees similar to our own staff.
- **Communicate and Improve:** Ensure that all our employees are aware of the Code and those responsible for purchasing are appropriately trained. Regularly review our program and practices to ensure they contribute to our responsible sourcing vision.

### **Expectations from Vendors:**

All supply chain partners must comply with the Vendor Code of Conduct. Vendors will undertake third party auditing to ensure compliance with the adherence to the practices mentioned in the vendor code of conduct.

### **Compliance with Laws and Regulations:**

We expect Vendors to comply with the laws and regulations related to the conduct of business including trade sanctions, competition/antitrust, and data privacy/protection laws.

### **Governance and Management Practices:**

**1. Governance:** Trent requires Vendors to comply with all applicable ethical trade laws and regulations in the countries where materials are sourced, produced, and incorporated into the product. In case of services, the location of service delivery should prevail.

- a) Policy:** *Vendors are expected to have a written policy covering respect for human rights, health & safety, labour rights, environment and anti-corruption.*

**b) Improvement Objectives:** *Written performance objectives, targets and implementation plans to improve the Vendor's social and environmental performance, including a periodic assessment of the Vendor's performance in achieving those objectives.*

**c) Audits and Assessment:** *Periodic self-evaluations to ensure conformity to the Code and customer contractual requirements related to social and environmental responsibility.*

## **2. Fair Business Practices:**

**a) Business Integrity:** *Highest standards of integrity are to be upheld in all business interactions. Vendors shall have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement.*

**b) Disclosure of Information:** *All business dealings should be transparently performed and accurately reflected on vendor's business books and records.*

**c) Intellectual Property:** *Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects Intellectual property rights; and customer and vendor information is to be safeguarded.*

**d) Protection of Identity:** *Ensure confidentiality, anonymity, and protection of Vendor and employee whistle-blowers, unless prohibited by law.*

**e) Conflict of Interest:** *Vendors are expected to report to Trent if there is any situation that may appear as a conflict of interest and disclose if any employee or professional under contract with Trent may have an interest in the vendor's business or any kind of economic ties with the vendor.*

**f) Data Privacy:** *Vendors are expected to process personal data confidentially and responsibly, respect everyone's privacy and ensure that personal data is effectively protected and used only for legitimate purposes.*

**g) Fair Competition:** *Vendors should act in accordance with national and international competition laws and not participate in price-fixing, market or customer allocation, market sharing, or bid rigging with competitors.*

**h) Gifts and Hospitality:** *Gifts and hospitality given or received should be modest in value and appropriate, and in compliance with Trent's Gifts and Hospitality policy.*

## **3. Environmental Protection**

**a) Energy Consumption and Emissions:** *Energy consumption and all relevant Scopes 1 and 2 (UNGC) greenhouse gas emissions are to be tracked and documented. Vendors are to look for cost-effective methods to improve energy efficiency in their operations.*

- b) **Environmental Permits and Reporting:** *All required environmental permits, approvals and registrations to be obtained, maintained and their operational and reporting requirements followed.*
- c) **Water Management:** *Vendor should document, categorize and monitor water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled and treated as required prior to discharge or disposal.*
- d) **Solid Waste:** *Vendors shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous).*
- e) **Hazardous Substances and Material Restrictions:** *Hazardous substances are to be identified, labelled and managed to ensure safe handling, movement, storage, use, recycling/ reuse and disposal. Vendors are to adhere to all applicable laws, regulations regarding restrictions of specific substances, including labelling for recycling/ disposal.*

#### 4. Community Development:

Trent expects supply chain partners to contribute to social, environmental and economic development of the communities in which they operate.

#### 5. Human Rights and Labour Practices:

- a) **Freely Chosen Employment:** *Forced labour, bonded labour or trafficking of persons shall not be used. Workers must be provided with a written employment agreement in their native language. Vendors and agents may not hold or otherwise destroy, confiscate, or deny access by employees to their identity/ immigration documents unless holding is required by law.*
- b) **Child Labour:** *Child labour is not to be used in any stage of manufacturing or in the provision of services or supplies. The term “child” refers to any person under the age of 15, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.*
- c) **Working Hours, leave, wages, and benefits:** *Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every week. Compensation paid to workers shall comply with all applicable wage laws, overtime hours, and legally mandated benefits.*
- d) **Harassment and Discrimination:** *There is to be no harsh or inhumane treatment, including any sexual harassment, sexual abuse, mental or physical coercion, or verbal abuse of workers. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers. Companies shall not engage in discrimination based on race, colour, age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, or marital status in hiring and employment practices.*

- e) **Freedom of Association:** *In conformance with local law, Vendors shall respect the right of all workers to form and join trade unions, and to bargain collectively.*

## 6. Health and Safety

- a) **Occupational Safety:** *Worker potential for exposure to potential safety hazards (chemical, electrical, and other energy sources, fire, vehicles, and fall hazards) are to be identified, assessed and controlled through proper design, engineering and administrative controls, safe work procedures and ongoing safety training.*
- b) **Emergency Preparedness:** *Potential emergencies are to be identified and assessed, and their impact is minimized by implementing emergency plans and response procedures, including emergency reporting, employee notification, and evacuation procedures.*
- c) **Injury and Illness:** *Procedures and systems are to be in place to prevent, manage, and report occupational injury and illness, including provisions to a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes.*
- d) **Hygiene, food, and sanitization:** *Worker's exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. They should be provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities.*
- e) **Protective Equipment:** *The company should ensure that workers are provided with protective equipment, where necessary, to perform their tasks.*

## 7. Extension to supply chain:

Trent expects its Vendors to adopt similar principles in dealing with their Vendors.

## 8. Reporting Violations:

Trent expects its Vendors to raise concerns about any potential breach of the Vendor Code or concerns regarding the business conduct. Concerns can be raised directly with the email address provided below or can be reported through our confidential reporting service. This confidential channel enables Vendors or employees at the vendor workplace to report any ethical concerns or breaches of the Trent Vendor Code of Conduct. Online reports can be filed at [ethics@trent-tata.com](mailto:ethics@trent-tata.com)

Phone Number: 1800 200 9350

Email ID: [trent@ethicshelpline.co.in](mailto:trent@ethicshelpline.co.in)

Approved on 7<sup>th</sup> February 2024