



VINTAGE COFFEE AND BEVERAGES LIMITED

PREVENTION OF SEXUAL HARASSMENT POLICY

1. BACKGROUND:

Vintage Coffee And Beverages Limited (hereinafter referred to as the “Company”) provides equal opportunity and a harassment free workplace notwithstanding race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. Thus in order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” of India (hereinafter referred to as the “Act”1) and existing rules framed thereunder namely the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the “Rules”2).

2. PURPOSE AND SCOPE:

Purpose of this policy is to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

This policy extends to all employees including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources, seconded and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours.

3. IMPORTANT DEFINITIONS:

“**Aggrieved Individual**” means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitors.

“**Complainant**” is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, if the aggrieved individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

VINTAGE COFFEE AND BEVERAGES LIMITED

Formerly known as “Spaceage Products Ltd”

(CIN No. L15100TG1980PLC161210)

Regd. & Corporate office : 202, Oxford Plaza, No.9-1-129/1, S.D.Road, Secunderabad- 500003, Telangana, INDIA

Phone +91 040 40266650, Fax: +91 040 27700805 | E-mail: info@vcbl.coffee | Website: www.vcbl.coffee



“Complainant” is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, if the aggrieved individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

“Employer” means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees and will include ‘Director and General Manager’, ‘Chief People Officer (CPO)’ and ‘Chief Operating Officer (COO)’.

“Internal Committee” means and includes an Internal Complaints Committee (hereinafter referred to as the “committee”).

“Presiding Officer” means the presiding officer of the IC and shall be a woman employed at a senior level at the workplace amongst the employees.

“Respondent” means a person against whom a complaint of alleging sexual harassment has been made under this policy.

“Parties” means collectively the complainant and the respondent.

“Sexual Harassment” may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

- i. unwelcome sexual advances (verbal, written or physical);
- ii. demand or request for sexual favors;
- iii. any other type of sexually-oriented conduct;
- iv. verbal abuse or ‘joking’ that is sex-oriented;
- v. any conduct that has the purpose or the effect of interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment.
- vi. inappropriate conduct could also be a joke, a prank or even a compliment. These gestures also lead to harassment although the intention of the individual might not be to offend the other person.

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“Workplace” means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. RAISING OF COMPLAINT:

- i. Any aggrieved individual may make in writing, a complaint of sexual harassment to the Human Resources (HR) or Administration/personnel Department (through respective Lines of Service HR) or through Company’s Ethics Office within a period of three (3) months from the date of incident and in case of more than one incident, within a period of three (3) months from the date of last incident unless the time period is extended.
- ii. The complaint should clearly mention name and available details of both the aggrieved person and the respondent. Anonymous or pseudonymous complaints will not be investigated.
- iii. Where the aggrieved individual is unable to make the complaint on account of her/his physical or mental incapacity or death or otherwise, his/her representative, as more fully described under Rule 6 of the said Rules, may make a complaint.
- iv. The complainant shall submit six copies of the complaint accompanied by available supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.

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6. **PROHIBITION ON DISCLOSURE OF INFORMATION:**

This policy prohibits any person from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings during the proceedings under the provisions of the Act. Any violation thereto shall also be subject to applicable disciplinary action as outlined in Employee Handbook.

7. **PROTECTION TO COMPLAINANT:**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

8. **CONCLUSION:**

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

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Corporate Office Address: 202, Oxford Plaza, SD Rd, Secunderabad.

POSH (Prevention of Sexual Harassment) Internal Committee Constitution

POSH (పని ప్రదేశంలో మహిళలపై లైంగిక వేధింపుల నివారణ, నిషేధం మరియు పరిష్కారం) అంతర్గత కమిటీ ఏర్పాటు

POSH (कार्यस्थल पर महिलाओं के यौन उत्पीड़न की रोकथाम, निषेध एवं निवारण) आंतरिक समिति का गठन

POSH Internal Committee Constitution

In compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Management of [Company Name] hereby constitutes the Internal Committee (IC) to prevent, prohibit, and redress complaints of sexual harassment at the workplace.

పని ప్రదేశంలో మహిళలపై లైంగిక వేధింపుల (నివారణ, నిషేధం మరియు పరిష్కారం) చట్టం, 2013 నిబంధనలకు అనుగుణంగా, [కంపెనీ పేరు] యాజమాన్యం పని ప్రదేశంలో లైంగిక వేధింపులను నివారించడం, నిషేధించడం మరియు వాటికి సంబంధించిన ఫిర్యాదులను పరిష్కరించడానికి అంతర్గత కమిటీ (Internal Committee - IC) ను ఏర్పాటు చేస్తున్నది.

कार्यस्थल पर महिलाओं के यौन उत्पीड़न (रोकथाम, निषेध एवं प्रतितोष) अधिनियम, 2013 के प्रावधानों के अनुपालन में, [कंपनी का नाम] का प्रबंधन कार्यस्थल पर यौन उत्पीड़न की रोकथाम, निषेध तथा शिकायतों के निवारण के उद्देश्य से आंतरिक समिति (Internal Committee - IC) का गठन करता है।

S No	Name of the Member	Gender	Department	Phone Number	Designation
1	Anusha M	F	Exports & Projects	8074009658	Head of Committee
2	Rajeshwari B	F	DFPL	8008002330	Member
3	Yasaswini D	F	Exports	7075888266	Member
4	Kranthi Kumar Y	M	CFO	8374970606	Member
5	TBA in 15 days	F	-	-	External Member

For Vintage Coffee & Beverages Ltd

Authorized Signature



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