

**POLICY FOR PREVENTION, PROHIBITION AND
REDRESSAL OF SEXUAL HARRASSMENT (POSH) AT
WORK PLACE**

VARUN BEVERAGES LIMITED

1. OBJECTIVE

Varun Beverages Ltd (VBL) is committed towards creating a work environment free of any form of harassment and bullying, where everyone is treated with dignity and respect. The purpose of this Policy is to promote and encourage respect and dignity for our colleagues and others and to evolve a mechanism for prohibition, prevention and redressal of Sexual Harassment cases and other acts of gender based violence thereby upholding the commitment of the Company to provide a safe environment free from gender based discrimination.

We also recognize that harassment and bullying can have very serious consequences for individuals and the company. We are committed towards taking appropriate actions for the prevention and redressal of unlawful discrimination and harassment at the workplace This aspect is addressed through the Code of Conduct and outside the purview of this policy.

Specifically, for cases potentially involving sexual harassment, we have outlined the policy and the procedure in this document.

2. SCOPE:

- This policy applies to all individuals who are employed/ engaged for work in regular, temporary, ad-hoc or daily wages basis, either directly or through an agent including a or contractor, with or without the knowledge of the Company, whether for remuneration or not working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes co-worker, a contract worker, probationer, trainee, apprentice at any business locations/offices of the VBL.
- It covers sexual harassment committed on, as well as outside the company premises, in which employees/other stake-holders may find themselves in connection with their employment/ company services.
- Workplace implies extended workplace including travel, place of stay and work, office functions that is provided by the company.

3. DEFINITIONS:

- a) "Board" means the Board of Directors of the Company
- b) "Presiding Officer" means Chairperson of the ICC appointed under this Policy
- c) "Company" means all offices and entities of VBL where Indian legislation applies
- d) "Employee" shall mean all individuals who are employed/ engaged for work in regular, temporary, ad-hoc or daily wages basis, either directly or through an agent including a or contractor, with or without the knowledge of the Company, whether for remuneration or not working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes

co-worker, a contract worker, probationer, trainee, apprentice at any business location/ office of VBL

- e) "ICC" means an Internal Complaints Committee constituted under these Rules
- f) "Policy" means this Policy i.e., the Policy for Prevention, Prohibition and Redressal of Sexual Harassment for prohibiting for sexual harassment at work place

4. MEANING OF SEXUAL HARASSMENT AND SEXUALLY ORIENTED BEHAVIOUR:

'Sexual Harassment', includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- a) Physical contact and advances; or
- b) A demand or request of sexual favors; or
- c) Making sexually colored remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or non- verbal conduct of sexual nature;

The above list is indicative only, a more comprehensive list is detailed out in Annexure 1.

Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS or emails, gestures, stalking, sounds or display of a nature with sexual overtures, impeding or blocking movements, standing at a close distance that would make the other person uncomfortable, exclusion from workplace conversations/social events, unfair allocation of work & responsibilities etc.

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 and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions, making or threatening reprisals (revenge) after a negative response to sexual advances.

It includes a demand or request for sexual favors as an implicit or explicit condition of employment or in return for with a promise of work related favors such as performance appraisals, promotions, transfers, salary increases and employment or any other form of reward or recognition.

It also includes implied or explicit promise of preferential treatment, threat of detrimental treatment in employment, threat about present or future employment status, interference with work or creating an intimidation or offensive or hostile work environment for the victim or humiliating treatment likely to affect health or safety of the victim,

In general, whether a particular action or behavior constitutes sexual harassment is determined by the recipient, and is not dependent upon the intention of the perpetrator. It cannot, therefore, be excused or justified claiming that it was unintentional or humorous. The implications of harassment are serious and VBL will take appropriate disciplinary action as described further.

5. RIGHTS AND RESPONSIBILITIES OF EMPLOYEES:

Employees must conduct themselves in a manner to ensure a work environment that promotes respect and upholds the dignity of every individual at the workplace

- Every Employee shall have the right to raise a complaint against Sexually Oriented Behaviour to which he/she was subject to or which was targeted at him/her, to the ICC or to the Presiding Officer or any other Member of the ICC established under these Rules, as the case may be
- All employees must read and acquaint themselves with the company policy to deal with unlawful discrimination and harassment at the workplace and clear any doubts they have with their local HR representative. Ignorance of this policy will not be treated as an excuse
- Every Employee shall promptly report any incident of Sexual Harassment that comes to his/her knowledge to the ICC or to the Presiding Officer of the ICC or to the Official designated by the Presiding Officer of the ICC as the case may be
- Employees must cooperate with the company in investigations and in preventing and curtailing unlawful discrimination and harassment at the workplace

6. CONSTITUTION OF THE INTERNAL COMPLAINTS COMMITTEE (ICC):

- The Board shall establish an ICC to deal with Sexual harassment. The ICC shall consist of 5 members, of which not less than 50% will be female members. This committee will include 1 external female member from an accredited and contextually relevant Non-Governmental Organization (NGO)
- One Female member to act as Presiding Officer of the ICC. The term of the office of ICC is for a period of three years post which the Company shall reconstitute the ICC
- The Presiding Officer will engage a person who is associated with an NGO or Institute that is engaged in the field of gender studies, equal opportunity, anti-gender discrimination, anti-sexual harassment movements, etc.
- The names of the persons who are on the ICC from time to time along with their contact telephone numbers and other details shall be displayed at all plant / unit locations

7. POWERS AND DUTIES OF THE ICC:

- To ensure implementation of this policy and its review on a periodic basis
- To ensure and supervise proper constitution and functioning of the ICC
- To organize regular workshop and training programs, based on organizational requirement
- To formulate programs for the spread of awareness of the policy among the management

8. COMPLAINT PROCEDURE:

- Conciliation: Any individual who feels that they, or others, have been harassed or treated in a way that breaches this policy should, if they feel able to do so, immediately tell the individual(s) doing it that the behavior in question is offensive, unwanted, and that they want it to stop. It may emerge that the harasser then realizes the effect of his/her actions and may cease to display such behavior when confronted. A note should be kept of the date(s) the individual(s) was approached and what was said. This may be needed in evidence should harassment, victimization or bullying continue or recur.
- However, if this is not possible or appropriate, the employee should follow the procedure detailed below and if required, seek assistance at any stage from the ICC. Employees must report harassment to the ICC at the earliest. To enable the committee to act on the complaint, it is advised the complaint be raised within a month of the incident.
- Such a complaint must be in writing and shared with the ICC and must be signed by the complainant. The names of the members of the ICC along with their email addresses and contact numbers are in Annexure 2.
- It will be the endeavor of the ICC to afford full confidentiality to the complainant, at this stage depending on the circumstances involved.
- Immediately upon receipt of the Complaint, and within not more than 2 working days, the Member of the ICC to whom the Complaint is made shall communicate the same to the Presiding Officer of the ICC, who shall inform all the members of the relevant local ICC. The local ICC members may, in discussion with the Presiding Officer and the External Member, decide interim steps to be taken till such time the investigation is completed.
- Within a period of 7 working days from the date of such communication, the Presiding Officer shall endeavor to convene a meeting of the ICC. Such a meeting may be face to face, through audio/ video conferencing or a combination thereof.
- The ICC shall examine the complaint and shall undertake investigation of the complaint after giving opportunities to the complainant to present his/her case and the defendant to give his version. The complainant/ defendant may request the presence of a line manager/any senior in the business who may be invited by the complaints committee for facilitation / support during the investigation proceedings.
- The ICC may examine witnesses from both the sides. Documents if any produced by the parties may be taken on record. If the case demands, the ICC may set up an investigation team of two members (one male and one female) having satisfied themselves that such a team is trained and competent to conduct the investigation. The ICC after completion of investigation may submit its report to the Decision Making Committee for further necessary action in the matter. The investigation by the ICC should be completed within 30 working days from the date of receipt of the complaint.

- The Decision Making Committee (comprising CHRO, CCO and CFO) will take the final decision on the case based on the recommendation of the ICC within 7 working days of receiving the recommendations.
- The decision on the case will be communicated to the complainant and defendant by the Chief HR Officer and Presiding Officer of the ICC.

9. PROTECTION AGAINST VICTIMIZATION:

- In the event complainant being an employee and the accused being his / her manager, during the pendency of investigation and even after such investigation if the manager is found to be guilty, the accused shall not act as Manager of the Complainant.
- During the pendency of the investigation, the ICC may, at the request of the complainant, grant leave for a period that may be deemed necessary, which will not extend beyond closure of the investigation/case. Also, the Investigation Committee may, at its sole discretion, ask the accused to proceed on leave, during the pendency of the investigation.

10. CONSEQUENCE OF COMPLAINT BEING PROVED/OR OTHERWISE:

- In the event, allegations made in the complaint are proved against the employee, it will be taken as proved misconduct and the competent authority may impose any of the punishment as envisaged in the policy on disciplinary process.
- The outcome of any redressal process will depend on the nature and circumstances of each grievance. Punishment accorded to offenders of the policy must be commensurate to the offence committed and must have a clear rationale. The ICC and the company's approach must ensure protection to the company from any possible risk and a reformative approach towards affected individual employees.
 - In such instances where a complaint is found to be malicious/ fictitious, such disciplinary action may be taken against the complainant as would have been taken against the accused, had the complaint been proven to be factual. However, the mere inability to substantiate a complaint or provide adequate proof would not be deemed adequate to attract action against the aggrieved complainant. Malicious intent or falsehood shall need to be established by enquiry before action is recommended.
- Disciplinary action may also be taken in instances where:
 - A person retaliates, threatens or victimizes another person because of their involvement in the grievance process.
 - Unnecessary disclosure of information (a breach of confidentiality) has occurred.
- Appeal: The complainant and the respondent have the right to appeal to the Managing Director/

Whole Time Director & Group CFO for review of actions taken based on the recommendations of the ICC. An aggrieved party may file any appeal provided s/he can demonstrate that actions taken by the Decision Making Committee on the recommendation of the ICC are violative of natural, procedural and/or substantive justice. This should be done within 7 working days of being informed of the actions to be taken.

- Record Keeping:
 - All records of cases handled by the ICC will be maintained by the Committee
 - The Presiding Officer will be required to file a half yearly report to the Chief HR Officer on the activities of the ICC
 - The ICC will in accordance with government regulation, submit annual reports regarding actual cases of sexual harassment at the workplace to the relevant government department.
 - The Presiding officer will submit quarterly report of complaints received, disposed off and pending with ICC with the Compliance officer for further submission of status report with the Audit Committee.

11. SAVINGS:

- The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the accused under any other provision of civil or criminal law.
- The provisions of this policy shall not restrict the power of company or complainant to proceed against the alleged offender for any other misconduct or to pursue criminal or civil remedies.

Annexure I

Sexually oriented behavior shall mean and include but not limited to the following:

- Material that is sexual in nature, sexist, sexually explicit and so on and is displayed in the workplace, circulated, or put in someone's workspace or belongings, or on a computer or fax machine or on the Internet or any other public display system or public place in the work premises
- Verbal abuse or comments that put down people because of their sex
- Comments about people's (women/men) bodies
- Tales of sexual exploits
- Graphic descriptions of pornography
- Pressure for dates
- Sexually explicit gestures
- Unwelcome touching and hugging
- Sexist and insulting graffiti
- Sexist jokes and cartoons
- Obscene phone calls / text messages
- Displaying pornography in the workplace
- Insisting that workers wear revealing clothing
- Inappropriate gifts (for example, lingerie)
- Discussion of one's partner's sexual inadequacies
- Lewd and threatening letters
- "Accidentally" brushing sexual parts of the body
- Pressing or rubbing up against a victim
- Sexual sneak attacks (such as grabbing private parts on the run)
- Indecent exposure
- Subtle or overt pressure for sexual favours
- Soliciting sexual services
- Demanding sexual services
- Sexual or physical contact, such as slapping, kissing or touching
- Intrusive questions about sexual activity
- Sexual assault
- Repeated sexual invitations when the person invited has refused/ignored similar invitations
- Coerced sexual intercourse (e.g., as a condition of employment or academic status)
- Stalking a work colleague either physically or virtually on the internet

Annexure 2 - Internal Complaints Committee

Region	Name	Role	Designation	Function	Email ID
Corporate Office (Gurugram, Haryana) & North Region (comprising of Delhi, Haryana, Uttar Pradesh Rajasthan, Punjab, Himachal Pradesh)	Anjali Bhatia	Presiding Officer	AVP	Human Resources	anjali.bhatia@rjcorp.in
	Ritu Jaisinghani	Member	Executive Secretary	Chairman's Office	ritu.jai@rjcorp.in
	Deepak Dabas	Member	VP	Investor Relations	deepak.dabas@rjcorp.in
	Deepak Sharma	Member	MUGM	Sales	deepak.sharma1@rjcorp.in
	Ujala Bedi Chaudhary	External Member			ujala@navjyoti.org.in

Plant Locations	Sales office Locations
Nuh (Haryana) Panipat (Haryana) Bhiwadi (Rajasthan) Jodhpur (Rajasthan) Pathankot (Punjab) Phillaur (Punjab) Greater Noida 1 (UP) Greater Noida 2 (UP) Kosi (UP) Sandila (UP) Jainpur (UP) Sathariya 1 & 2 (UP)	Okhla Gurugram (Nirvana Courtyard) Jaipur Greater Noida Chandigarh Lucknow Varanasi Agra

East Region (comprising of Bihar, Jharkhand, Odisha, West Bengal, North East)	Anjali Bhatia	Presiding Officer	AVP	Human Resources	anjali.bhatia@rjcorp.in
	Soma Sen	Member	Deputy Manager	Quality	soma.sen@rjcorp.in
	Suman Kumar	Member	MUGM	Sales	suman.kumar@rjcorp.in
	Mukesh Patro	Member	Vice President	Production	mukesh.patro@rjcorp.in
	Ujala Bedi Chaudhary	External Member			ujala@navjyoti.org.in

Jamshedpur (Jharkhand) Sonarpur (Kolkata) Guwahati I & II (Assam) Cuttack (Odisha)	Patna Bhubaneshwar Kolkata Guwahati
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West Region (comprising of Maharashtra, Goa, Gujarat, Madhya Pradesh, Chhattisgarh)	Anjali Bhatia	Presiding Officer	AVP	Human Resources	anjali.bhatia@rjcorp.in
	Chaitali Momaya	Member	DGM	Human Resources	chaitali.momaya@rjcorp.in
	Naveen Kumar	Member	AVP	Operations	naveen.k@rjcorp.in
	Saurabh Kapoor	Member	GM	Human Resources	saurabh.kapoor@rjcorp.in
	Ujala Bedi Chaudhary	External Member			ujala@navjyoti.org.in

Bhopal (MP) Bharuch (Gujarat) Mahul Mumbai, MH) Roha (Raigarh, MH) Paithan (Aurangabad, MH)	Nagpur Mumbai Pune Ahmedabad Bhopal Raipur Goa
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South Region (comprising of Tamil Nadu, Karnataka, Andhra Pradesh, Telangana, Kerala)	Anjali Bhatia	Presiding Officer	AVP	Human Resources	anjali.bhatia@rjcorp.in
	Juliet Sachika Antony	Member	Area Manager-BD	Marketing	juliet.antony@rjcorp.in
	Ajit V	Member	DGM	Human Resources	ajit.v@rjcorp.in
	Manmohan Paul	Member	COO	Sales	manmohan.paul@rjcorp.in
	Ujala Bedi Chaudhary	External Member			ujala@navjyoti.org.in

Mamandur (TN) Sangareddy (Telangana) Sri City (AP) Nelamangala, Dharwad (Karnataka) Palakkad (Kerala)	Chennai Kochi Hyderabad Bengaluru Dharwad
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