



CONFIDENTIAL

Prevention of Sexual Harassment (POSH)

PREVENTION OF SEXUAL HARASSMENT (POSH)

Including Community Grievance Redress Mechanism

Proposed Freeze Dried Coffee Manufacturing Facility

Vintage Coffee and Beverages Limited (VCBL)

Plot No: UDL3, Sy No. 1266, TSFPZ Wargal PH-1, TGIIC Wargal Industrial Area,
Wargal Mandal, Siddipet District, Telangana State

Aligned with IFC Performance Standards | ISO 14001:2026 | ISO 45001:2018

Reference: VCBL-ESMS-PRO-005

Revision: 00

Effective Date: 01 July 2026



Vintage Coffee and Beverages Limited,

Reg. Office: 202, Oxford Plaza, Sarojini Devi Road, Shivaji Nagar,

Secunderabad, Telangana 500003.





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Document Control

Document No.	Revision	Effective Date	Classification
VCBL-ESMS-PRO-005	Rev. 00	01 July 2026	Controlled Document
Prepared By	Reviewed By	Approved By	Next Review
ESG Coordinator	ESG Head	Executive Director	30 June 2027

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Prevention of Sexual Harassment (POSH)

1. Purpose

Vintage Coffee and Beverages Ltd. is committed to creating a safe, respectful & inclusive workplace for all its employees. This policy is aimed at preventing sexual harassment, providing a clear mechanism for reporting & resolving complaints, redressal mechanism, and ensuring a work environment free from harassment.

2. Scope

This policy applies to all employees of Vintage Coffee and Beverages Ltd., including permanent, contractual, temporary, and part-time workers, interns, and visitors to the workplace.

3. Workplace Coverage

The policy applies to sexual harassment occurring:

- i. Within company premises
- ii. At all manufacturing facilities
- iii. In office spaces and administrative areas
- iv. During work-related travel
- v. At company events, meetings, and training programs
- vi. In digital communications related to work (email, messaging platforms, etc.)

4. Objectives

The key objectives of this policy are:

- i. Zero Tolerance: Ensure zero tolerance towards sexual harassment at the workplace.
- ii. Awareness & Prevention: Promote awareness among employees regarding acceptable workplace behaviour.
- iii. Accessible Reporting Mechanism: Provide safe and confidential channels for reporting incidents.
- iv. Fair Investigation: Ensure impartial, transparent, and timely investigation of complaints.
- v. Protection from Retaliation: Safeguard complainants and witnesses from retaliation or victimization.
- vi. Accountability: Hold offenders accountable through appropriate disciplinary action.





Prevention of Sexual Harassment (POSH)

5. Definition of Sexual Harassment

Sexual harassment includes following unwelcome act or behaviour involving:

- i. Physical contact and advances
- ii. Demand or request for sexual favours
- iii. Making sexually coloured remarks
- iv. Showing pornography
- v. Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature
- vi. Hostile work environment, creating distress, humiliation, interfering with performance.

6. Legal Compliance

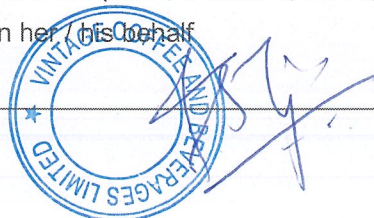
The policy adheres to the provisions outlined in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

7. Internal Committee (IC)

- Vintage Coffee and Beverages Ltd. will constitute an Internal Committee (IC) to address complaints of sexual harassment. The committee will include:
 - A Presiding Officer (a senior woman employee)
 - Two employee members familiar with issues related to harassment
 - An external member from an NGO or an individual with expertise in women's rights or social work.
- The IC will have a mandate to receive complaints, investigate, and recommend appropriate actions.
- The IC Members shall serve for a maximum period of 3 years

8. Complaint Process

- Anyone who believes they have experienced sexual harassment at VCBL can submit a written complaint to the IC within 3 months of the incident.
- The complaint should include:
 - i. Name of the complainant
 - ii. Name of the respondent
 - iii. Description of the incident
 - iv. Date and location of occurrence
 - v. Supporting evidence (if available)
 - vi. Names of witnesses (if any)
- Where the complainant is unable to file the complaint, a relative, friend, co-worker or a NGO representative may file the complaint on her / his behalf





Prevention of Sexual Harassment (POSH)

- The IC will ensure confidentiality and conduct a thorough investigation, providing the accused an opportunity to be heard
- The investigation should be initiated within 7 days & completed within 90 days from the date of complaint, and the report will be submitted to the employer for action within 10 days.

9. Redressal and Disciplinary Action

- If the IC finds that the complaint is valid, appropriate action will be taken against the perpetrator, which may include:
 - i. Written apology
 - ii. Warning
 - iii. Transfer or suspension
 - iv. Deduction from salary (for compensation to the victim)
 - v. Termination of employment
- In cases where the complaint is found to be malicious or false, disciplinary action may be taken against the complainant.

10. Confidentiality

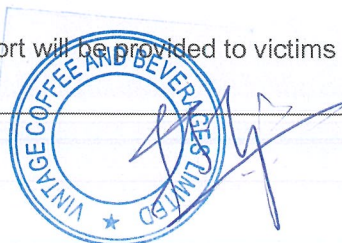
- The identity of the complainant, respondent, witnesses, and any other related details will be kept confidential throughout the process.
- Breach of confidentiality by any member of the IC or other involved individuals will result in disciplinary action.

11. Preventive Measures

- Vintage Coffee and Beverages Ltd. will regularly conduct workshops and training sessions to raise awareness about sexual harassment and promote a culture of respect.
- The policy will be communicated clearly to all employees and displayed prominently at the workplace.
- Conduct orientation for new employees
- Provide IC training

12. Support for Victims

- The company will ensure that the complainant is not victimized or discriminated against for filing a complaint.
- Counselling services and support will be provided to victims if required.





Prevention of Sexual Harassment (POSH)

13. False Complaints

While the policy encourages employees to report harassment, it also strictly prohibits false complaints. If a complaint is found to be malicious or false, disciplinary action will be taken against the complainant. The company strictly prohibits retaliation against complainants, witnesses or IC members. Any retaliation will be treated as misconduct.

14. Employer Responsibilities

Management shall ensure:

- A safe working environment
- Implementation of this policy
- Assistance to the IC
- Timely reporting to authorities
- Display of POSH policy and IC contact details

15. Record Keeping & Reporting

The IC shall maintain:

- Complaint register
- Inquiry reports
- Annual POSH compliance report

Annual reports shall include:

- Number of complaints received
- Number resolved
- Pending cases

16. Policy Review

This policy will be reviewed every 2 years or as needed to ensure compliance with any changes in the law or company policy.

17. Members of POSH IC Committee

ANNEXURE-1





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Prevention of Sexual Harassment (POSH)**ANNEXURE-1**

VINTAGE COFFEE AND BEVERAGES LIMITED 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 प्रतियोग) 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





No: VCBL/HR/PoSH/Ver-1.3/01 Dated 10-07-2026

VINTAGE COFFEE & BEVERAGES LIMITED

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
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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	Sumithra Parvatha	F	External	9445848886	External Member

For Vintage Coffee & Beverages Ltd

Authorized Signature



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

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