

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

APPROVAL	
Guideline Sponsor:	Beam Global Spirits & Wine (India) Pvt. Ltd.
Policy Owner:	Human Resources, Beam India
VERSION CONTROL	
Policy rolled out : [●] Version: [●]	Version 01 of CY 2025

SECTION I: POLICY STATEMENT AND OBJECTIVES

- 1.1 BEAM GLOBAL SPIRITS & WINE (INDIA) PRIVATE LIMITED ("**Beam India**" or "**Company**") has a zero tolerance policy towards any Sexual Harassment at the Workplace. Accordingly, Employees are strictly prohibited from engaging in any act of Sexual Harassment at the Workplace.
- 1.2 Beam India is committed to ensuring all Employees are treated fairly and equitably, and in a safe environment free from any intimidation and / or any form of Sexual Harassment. Beam India also aims to foster and provide a work environment where people are treated with respect, courtesy and dignity. Sexual Harassment is an unacceptable and an unlawful form of behavior and will not be tolerated at any Workplace (as later defined).
- 1.3 This policy (this "**Policy**") is prepared and notified by the Company in order to comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (collectively the "**Act**"). This Policy is to be read along with the Act.
- 1.4 This Policy has been framed with an aim to prevent and prohibit Sexual Harassment at the Workplace, and to put together a mechanism for redressal of Sexual Harassment should it so occur at the Workplace, and for the matters connected herewith or incidental thereto.
- 1.5 All complaints of Sexual Harassment will be taken up with a high degree of confidentiality, inquired into promptly, thoroughly and in a fair manner.
- 1.6 The Company reserves the right to amend this Policy from time to time and any such amended Policy shall be duly notified by the Company.
- 1.7 Nothing contained in this Policy shall prevent any victim of Sexual Harassment to seek any additional recourse available under civil or criminal law, as in force from time to time.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

SECTION II: DEFINITIONS

- 2.1 **"Act"** has the meaning ascribed to it at Clause 1.3.
- 2.2 **"Aggrieved Woman"** in relation to a Workplace, means a woman of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment by an Employee of the Company.
- 2.3 **"Company" or "Beam India"** has the meaning ascribed to it at Clause 1.1.
- 2.4 **"Complainant"** means an Aggrieved Woman (and / or any person on behalf of the Aggrieved Woman as permitted under Clause 4.1 read with Annexure I of this Policy), filing a complaint under this Policy, alleging Sexual Harassment.
- 2.5 **"Employee"** means a person employed with or engaged by the Company for any work on regular, temporary, consultant, ad hoc, daily wage basis or part time basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice, intern or called by any other such name. For the avoidance of any doubt, the aforesaid broad definition of employee is applicable only for the purposes of the Act and this Policy, and not intended to in itself create or imply an "employer-employee relationship" for the purposes of other applicable laws.
- 2.6 **"Employer"** means, Beam India acting, for purposes of the Act and this Policy, through its Human Resource Director.
- 2.7 **"Internal Committee" or "IC"** has the meaning ascribed to it at Clause 3.1.
- 2.8 **"Policy"** has the meaning ascribed to it at 1.3.
- 2.9 **"Presiding Officer"** has the meaning ascribed to it at Clause 3.2(a).
- 2.10 **"Sexual Harassment"**
- (A) Sexual Harassment includes any one or more of the following unwelcome acts or behaviors (whether directly and / or indirectly and / or by implication):-
- (a) physical contact and / or advances;
 - (b) a demand, request or offer for sexual favors;
 - (c) making or sharing sexually colored remarks, gestures or sounds, including but not limited to teasing, epithets, innuendos, jokes, comments of a sexual nature, whether generic or about a person and / or their body or clothing, sexual

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

- orientation, sexual prowess or sexual deficiencies, or other expressions which have a sexual connotation/overtone;
- (d) showing pornography, erotic or obscene material including displaying or sharing images, posters, pictures, screen savers, objects, gifts, signs or other material of a sexual nature or having a sexual connotation;
 - (e) sexual advances of any kind involving verbal, non-verbal, or physical conduct, whether implicit or explicit;
 - (f) following or contacting/attempting to contact a person repeatedly to foster personal interaction despite a clear indication of disinterest by such person;
 - (g) asking questions about another person's sexual conduct, or sexual orientation, or volunteering information about the sexual conduct of oneself or others; and / or
 - (h) any other unwelcome physical, verbal or nonverbal conduct, communication or behaviour, of a sexual nature.

Explanation: Any of the aforesaid acts, conduct or behaviors will, for the purposes of this Policy, amount to Sexual Harassment, irrespective of whether such act, conduct or behavior was committed in written, printed, graphic, gestural, verbal, audio – visual or other form, whether in person or through any mode or channel of communication including phone calls, audio or video calls, audio or video meetings, texts, instant messengers or chat platforms or applications, emails, technology platforms/ applications, social media or otherwise.

- (B) Further, the following circumstances among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment (as defined in (A) above), may also amount to Sexual Harassment for the purposes of this Policy:
- (a) implied or explicit promise of preferential treatment in the Aggrieved Woman's employment;
 - (b) implied or explicit threat of detrimental treatment in the Aggrieved Woman's employment;
 - (c) implied or explicit threat about the Aggrieved Woman's present or future employment status;
 - (d) interference with the Aggrieved Woman's work or creating an intimidating or offensive or hostile work environment; and / or
 - (e) humiliating treatment likely to affect the Aggrieved Woman's health or safety.

Explanation: Sexual Harassment may occur even in the absence of the circumstances listed in (B) above.

- 2.11 **"Respondent"** means an Employee of the Company against whom a Complainant has made a complaint of Sexual Harassment under this Policy.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

2.12 **"Workplace"** includes:

- (a) premises, locations, establishments, institutions, offices, branches, units, warehouses, or manufacturing facilities established, owned or controlled by the Company;
- (b) places visited by an Employee arising out of or during the course of employment or engagement with the Company, including transportation for undertaking such journey; and / or
- (c) Off sites, events or programs (whether business, social or otherwise) organized or attended, by or on behalf of the Company including at a third party's premise.

SECTION III: CONSTITUTION OF INTERNAL COMMITTEE

- 3.1 The Company shall, by an order in writing, constitute internal committees (each an **"Internal Committee"** or **"IC"**) for each of its offices, manufacturing facilities, branches and administrative units, to conduct an inquiry into a complaint of Sexual Harassment. The order constituting the ICs shall be displayed at conspicuous places at the respective workplaces, and such orders shall *interalia* contain names and contact details of all the members of the IC.
- 3.2 Each Internal Committee shall comprise of the following members, to be nominated by the Company:
- (a) a presiding officer of the IC (**"Presiding Officer"**) who shall be a woman employed at a senior level at the workplace from amongst the employees of the Company. Where a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the Company.
 - (b) not less than 2 (two) members from amongst the employees of the Company preferably committed to the cause of women, or who have had experience in social work or have legal knowledge; and
 - (c) 1 (one) member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- 3.3 For each IC, at least one-half of its total members, shall be women.
- 3.4 The Act has vested the IC with certain powers that a civil court has under the Code of Civil Procedure, 1908. Accordingly, the IC shall be vested with the powers of: (a) summoning and enforcing the attendance of any person, and examining him/her, on oath, and (b) requiring the discovery and production of documents; as are provided to a civil court under the Code of Civil Procedure, 1908.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

- 3.5 The ICs shall perform their respective obligations and duties as prescribed under all applicable laws, the Act, and this Policy including the obligations and duties as set out in Annexure II of this Policy.
- 3.6 Subject to Clause 3.7 to 3.10 below, the Presiding Officer and every member of an IC shall hold office for such period as may be specified by the Company in accordance with the Act.
- 3.7 In case the Presiding Officer or any other member of an IC ceases to be employed or engaged, with the Company, then such person's nomination on the IC shall also automatically be ceased or vacated.
- 3.8 A Presiding Officer or any other member of an IC may resign at any time by tendering his or her resignation in writing to the Company.
- 3.9 Where the Presiding Officer or any other member of an IC:
- (a) Contravenes the requirements of the Act or this Policy;
 - (b) Has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him/her;
 - (c) Has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; and / or
 - (d) Has abused his/ her position as to render their continuance in office prejudicial to public interest;
- such Presiding Officer or IC member as the case may be, shall be removed from the IC.
- 3.10 In the event that the complaint of Sexual Harassment has been made against any member or Presiding Office of the IC then such member or Presiding Office (as the case may be) shall be removed from the IC.
- 3.11 Any vacancy created in an IC (including on account of Clause 3.7 to 3.10 above) shall be filled by a fresh nomination and written order by the Company. Such nomination shall be made as expeditiously as possible and in any case within 7 (seven) days of the date of the vacancy.

SECTION IV: INQUIRY AND REDRESSAL PROCESS

Filing of Complaint

- 4.1 A complaint can be made by an Aggrieved Woman and in certain special circumstances (i.e. in case of physical incapacity, mental incapacity, death or otherwise as provided in Annexure I this Policy) by the persons stipulated in Annexure I of this Policy. All complaints should be submitted to the IC.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

- 4.2 The Complainant should make the complaint in writing or through email, to the IC. However, in case the Complainant makes an oral complaint to the IC and is unable to make a written complaint, any member of the IC shall render all reasonable assistance to the Complainant for making the complaint in writing.

Along with the complaint, the Complainant should submit all supporting documents, information, and the name and details of the Respondent, and names and addresses of the witnesses, if any.

- 4.3 A Complainant may submit the complaint of Sexual Harassment, to the IC, within 3 (three) months from the date of the incident and in case of a series of incidents, within a period of 3 (three) months from the date of the last incident. The IC may, for reasons to be recorded in writing, extend the aforesaid time period by a maximum of 3 (three) more months, if it is satisfied that circumstances were such which prevented the Complainant from making a complaint within the original 3 (three) month period.

- 4.4 On receipt of the complaint, the IC shall send 1 (one) copy of the complaint (and other supporting documents, information, other details etc. submitted by the Complainant to it) to the Respondent within 7 (seven) working days.

The Respondent shall file his/her reply to the complaint along with any supporting documents and information, and names and addresses of witnesses (if any), within a period of ten (10) working days from the date on which the Respondent received the copy of the complaint from the IC.

A copy of the response so received from the Respondent (along with supporting documents information, other details etc.) should be shared by the IC, with the Complainant, immediately.

Conciliation

- 4.5 Before initiating an inquiry, the IC may, at the written request of the Aggrieved Woman take steps to settle the matter between the Aggrieved Woman and the Respondent through conciliation. However, no monetary settlement shall be made a basis of such conciliation.
- 4.6 Where a settlement has been so arrived at mutually in accordance with Clause 4.5 above, the IC shall record the settlement in writing, provide a copy of the same to the Aggrieved Woman and the Respondent, and also forward a copy of the same to the Employer to take action as specified in the recommendation of the IC.
- 4.7 Where a settlement has been arrived at in accordance with Clause 4.5 and 4.6 above, no further inquiry shall be conducted by the IC. Having said that, if the Aggrieved Woman informs the IC that any term or condition of the settlement has not been complied with by the Respondent, the IC shall proceed to make an inquiry into the complaint.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

Inquiry Process

- 4.8 In case (a) the Aggrieved Woman does not opt for conciliation or (b) the Aggrieved Woman opts for conciliation but no settlement is reached through conciliation or (c) any term or condition of the settlement (arrived at after conciliation) is not complied with by the Respondent; the IC shall proceed to conduct an inquiry into the complaint.
- 4.9 The inquiry shall be conducted in the presence of a minimum of 3 (three) members of the IC including the Presiding Officer.
- 4.10 The IC shall conduct the inquiry into the complaint in accordance with the principles of natural justice, and in a fair, reasonable and transparent manner. This *interalia* includes giving both parties (and their witnesses) an opportunity of being heard and an opportunity to present their respective case, evidence, witnesses, and arguments; allowing both parties an opportunity to cross examine / ask questions (whether directly or put through the IC) to the other side and the witnesses; providing both parties a copy of the findings (and giving them an opportunity to make representation against the same); providing both parties a copy of the findings, recommendations and the final report of the IC; and making a reasoned report.

The IC shall ensure that the respect and dignity of all parties concerned is maintained during the proceedings and that the proceedings are conducted in a manner so as to ensure freedom of expression and in an atmosphere free of intimidation and free of victimization.

- 4.11 The IC shall conduct the inquiry into the complaint in accordance with all applicable laws including without limitation the Act and this Policy.
- 4.12 The Complainant or the Respondent shall not be allowed to bring in any legal practitioner to represent them in their respective case, at any stage of the proceedings before the IC
- 4.13 During the pendency of the inquiry, on a written request made by the Complainant the IC may recommend to the Employer any of the following reliefs:
- (a) transfer of the Aggrieved Woman or the Respondent to any other workplace of the Company;
 - (b) grant leave to the Aggrieved Woman for up to a period of 3 (three) months (such leave will be in addition to any other leaves such person would otherwise be entitled to); and /or
 - (c) restrain the Respondent from reporting on the work performance of the Aggrieved Woman or writing the confidential report of the Aggrieved Woman, and assign the same to another officer.

Upon receiving the recommendations from the IC, the Employer shall implement the recommendations made and send a report of such implementation to the IC.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

- 4.14 Termination of Proceedings / Ex parte Order. The IC shall have the right to terminate the inquiry proceedings or to give an ex parte decision, in writing, on the complaint, if either of the Complainant or the Respondent fails, without sufficient cause, to present themselves for 3 (three) consecutive hearings before the IC. However, such termination or ex parte order may not be passed without giving a written notice, 15 (fifteen) days in advance, to the party concerned.

Completion of Inquiry and Report

- 4.15 The inquiry by the IC is required to be completed within 90 (ninety) days of the receipt of the complaint.
- 4.16 Upon completion of the inquiry, if the IC arrives at a conclusion that the allegation(s) against the Respondent has not been proved, then it shall recommend to the Employer, in writing that no action is required to be taken in the matter.
- 4.17 Upon completion of the inquiry, if the IC arrives at the conclusion that the allegation(s) against the Respondent has been proved it shall recommend in writing to the Employer to take action against the Respondent, which may *interalia* include:
- (a) issuance of written warning;
 - (b) seeking a written apology;
 - (c) reprimand or censure;
 - (d) withholding of increments or promotion;
 - (e) deduction from the salary or wages of the Respondent of such sum (as compensation) as the IC may consider appropriate to be paid to the Aggrieved Woman or to her legal heirs;
 - (f) suspension (with or without remuneration) for a period to be determined by the IC keeping in mind the gravity of the offensive conduct;
 - (g) termination from service;
 - (h) undergoing counseling session;
 - (i) carrying out community service; and / or
 - (j) taking action for Sexual Harassment as a misconduct as may be prescribed under applicable laws (including service rules if any), internal policies of Company and /or the terms of the contract with the Respondent.

For determination of compensation for the purposes of Clause 4.17(e) above, the IC may take into account the following factors: the mental trauma, pain, suffering and emotional distress caused to the Aggrieved Woman; the loss in the career opportunity due to the incident of Sexual Harassment; medical expenses incurred by the Aggrieved Woman for physical or psychiatric treatment; the income and financial status of the Respondent; and feasibility of such payment in lump sum or in instalments.

In case the Employer is unable to make deductions from the salary of the Respondent due to his/her being absent from duty or cessation of employment, it may direct the Respondent to pay such sum

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

to the Aggrieved Woman. In case the Respondent fails to pay the sum referred to above, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.

- 4.18 Where the IC arrives at a conclusion that (a) the allegation made by the Complainant against the Respondent is malicious or (b) the Complainant has made the complaint knowing it to be false or (c) the Complainant, Respondent, or any witness has produced any false evidence, forged or misleading document or false testimony, it may recommend to the Employer to take one or more of the following actions against the Complainant, Respondent or witness, as the case may be:

- (i) issuance of written warning;
- (ii) seeking a written apology;
- (iii) reprimand or censure;
- (iv) withholding of increments or promotion;
- (v) termination from service;
- (vi) undergoing counseling session;
- (vii) carrying out community service; and / or
- (viii) taking such action as may be prescribed under applicable laws, internal policies of Company and / or the terms of the contract with the said person;

Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.

The findings mentioned in this Clause 4.18 above shall be established after an inquiry in accordance with the process prescribed, before any action is recommended by the IC to the Employer in this regard.

- 4.19 The IC shall submit a reasoned report in writing with its findings and recommendations (as per sub Clause 4.16 to 4.18 as applicable), to the Employer within ten (10) days from the date of completion of the inquiry. Copies of the said report shall also be made available to the Complainant and the Respondent within ten (10) days from the date of completion of the inquiry.
- 4.20 Upon receipt of the recommendations of the IC (as provided above) the Employer shall promptly act upon and implement the same, and in any case no later than sixty (60) days of receipt of the same. The Employer will also send a report evidencing implementation of such recommendations to the IC.
- 4.20A A broad pictorial representation of the inquiry process and timelines is provided at Annexure V of this Policy.

Appeal

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

- 4.21 In the event the Complainant, Respondent, or any other person is aggrieved as per the scenarios provided at Section 18 of the Act including by any finding and/or the recommendations of the IC and /or the non-implementation of the recommendation(s) made by the IC, he/she may appeal to the Appellate Authority, within a period of ninety (90) days of the recommendations.

For the purposes of this Policy, the Appellate Authority shall be the court, tribunal or authority, as may be prescribed under applicable laws, from time to time, for the purposes of filing of an appeal under the provisions of the Act.

SECTION V: ADDITIONAL PROVISIONS

Protection Against Retaliation

- 5.1 Regardless of the outcome of the complaint made in good faith, the Complainant, and any person providing information or assistance to the IC, and /or any witness, will be protected from any form of retaliation. While dealing with complaints of Sexual Harassment, the IC shall take all reasonable steps to ensure that the Complainant, and any person providing information or assistance to the IC, and /or any witness, are not victimized or discriminated against by the Respondent. Any unwarranted pressures, retaliatory or any other type of unethical, hostile or inappropriate behaviour from the Respondent against the Complainant / any witness / other person, while the inquiry is in progress should be reported in writing by the Complainant / any witness / other person (as the case may be) to the IC as soon as possible.

Confidentiality

- 5.2 The contents of the complaint made, the identity and addresses of the Complainant, the Respondent and witnesses, any and all information relating to conciliation and inquiry proceedings, findings and recommendations of the IC and the action taken by the Employer as per the provisions of the Act and this Policy shall not be published, communicated or made known to the public, press and media in any manner. If this provision is contravened, the Employer shall be entitled to take all steps to secure confidentiality, take all actions in accordance with law, the Act, Company's policies and / or provisions of the contract with such person, for such breach and also recover from such person such sum as penalty as may be prescribed thereunder.

However, information may be disseminated regarding the justice secured to any victim of Sexual Harassment without disclosing the name, address, identity or any other particulars, which may lead to the identification of the Aggrieved Woman, Respondent, the Complainant, and witnesses.

Obligations of the Company

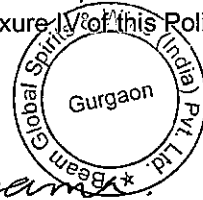
- 5.3 The Company shall perform its obligations and duties as prescribed under all applicable laws, the

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

Act, and this Policy including the obligations and duties as set out in Annexure III of this Policy.

Obligations of the Employees

- 5.4 The Employees of the Company shall abide by the obligations and duties as prescribed under all applicable laws, including the obligations and duties as set out in Annexure IV of this Policy.




SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

ANNEXURE I

PERSONS WHO CAN FILE COMPLAINTS ON BEHALF OF AN AGGRIEVED WOMAN

1. In case the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Woman, by :
 - (a) her relative or friend; or
 - (b) her co-worker; or
 - (c) an officer of the National Commission for Women or State Women's Commission; or
 - (d) any person who has knowledge of the incident.
 2. In case the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:
 - (a) her relative or friend; or
 - (b) a Special Educator; or
 - (c) a qualified psychiatrist or psychologist; or
 - (d) the guardian or authority under whose care the Aggrieved Woman is receiving treatment or care; or
 - (e) any person who has knowledge of the incident jointly with (i) the Aggrieved Woman's relative or friend or (ii) a Special Educator or (iii) a qualified psychiatrist or psychologist, or (iv) guardian or authority under whose care the Aggrieved Woman is receiving treatment or care.
- For the purposes of this Policy, "**Special Educator**" means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.
3. In case the Aggrieved Woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the Aggrieved Woman's written consent.
 4. In case of death of the Aggrieved Woman, a complaint may be filed by any person who has knowledge of the incident, with the written consent of Aggrieved Woman's legal heir(s).

Anupama



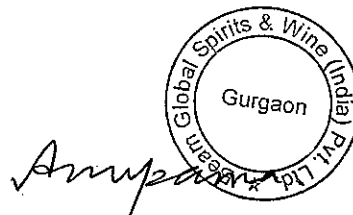
SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

ANNEXURE II

DUTIES OF THE INTERNAL COMMITTEE

The IC shall *inter alia*:

1. Comply with all applicable laws, the provisions of Act, and this Policy.
2. Conduct the inquiry into complaints relating to Sexual Harassment in a fair, diligent and expeditious manner.
3. Formulate programmes for the spread of awareness of the Policy among the management and employees of the Company.
4. Keep a record of all complaints received and the actions taken by the IC and the Employer thereon.
5. Comply with all reporting and filing requirements as may be prescribed under applicable laws and the Act, from time to time.
6. Maintain confidentiality of the IC proceedings including any and all information in relation to the contents of the complaint, the identity and addresses of the Complainant, Respondent and witnesses, the conciliation and inquiry proceedings, findings and recommendations of the IC, the action taken by the Company, etc.

A handwritten signature in black ink is written over a circular stamp. The stamp contains the text "Suntory Global Spirits & Wine (India) Pvt. Ltd. Gurgaon" around the perimeter.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

ANNEXURE III

DUTIES OF THE COMPANY

The Company shall *inter alia*:

1. Comply with all applicable laws including the Act and this Policy.
2. Provide a safe working environment at the Workplace, which shall include safety for persons coming into contact at the Workplace, and providing a safe working environment free from Sexual Harassment.
3. Display at conspicuous places in the Workplace and widely disseminate this Policy, the penal consequences of Sexual Harassment, and the order constituting the IC(s) which shall include the names and contact details of all the members of the IC.
4. Organise at regular intervals (i) workshops and awareness programmes for sensitizing the Employees with the provisions of the Act and this Policy and (ii) orientation, capacity and skill building and training programmes for the members of the ICs.
5. Provide necessary facilities, assistance and information to the IC for dealing with the complaint and conducting the inquiry.
6. Assist in securing the attendance of Respondent and witnesses before the IC.
7. Make available such information to the IC as it may require having regard to the complaint of Sexual Harassment.
8. Provide assistance to the Aggrieved Woman if she so chooses to file a complaint or FIR in relation to the offence under the Indian Penal Code 1860 or any other law for the time being in force.
9. Cause to initiate action, under the Indian Penal Code 1860 or any other applicable law, against the perpetrator, or if the Complainant so desires, where the perpetrator is not an Employee, in the workplace at which the incident of Sexual Harassment took place.
10. Treat Sexual Harassment as misconduct under the service rules and internal policies and initiate action for such misconduct.
11. Monitor the timely submission of reports by the IC and ensure compliance with all applicable laws and this Policy.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

12. Widely disseminate this Policy for prohibition, prevention and redressal of Sexual Harassment at the Workplace, intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against any person.
13. Comply with the reporting requirements under applicable laws including the Companies Act 2013, and also as prescribed under Sections 21 and 22 of the Act and submit annual reports to the respective District Officers (as specified under the Act) in a form and comprising details as required under the Act.

Anupama

A circular stamp with the text "Suntory Global Spirits & Wine (India) Pvt. Ltd." around the perimeter and "Gurgaon" in the center. A handwritten signature, "Anupama", is written across the stamp.

SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES


ANNEXURE IV

DUTIES OF THE EMPLOYEES

The Employees shall *interalia*:

1. Comply with all applicable laws including the Act and this Policy;
2. Familiarize themselves with the Act and this Policy;
3. Not encourage, engage, abet or participate in any act or behavior that may amount to Sexual Harassment, and / or retaliation against any Complainant / witness; and
4. Fully cooperate with the IC in any inquiry or proceedings undertaken by the IC pursuant to this Policy.

Anupama



SEXUAL HARASSMENT PREVENTION POLICY: HUMAN RESOURCES

**ANNEXURE V:
FOR IC INQUIRY**

BROAD TIMELINES & PROCESS

