



Cupid Breweries and Distilleries Limited

CIN: L11010MH1985PLC036665

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Policy and Guidelines for Prevention and Prohibition of Sexual Harassment at Workplace

1. Purpose

Cupid Breweries and Distilleries Limited (“the Company”) is committed to providing a workplace free from all forms of sexual harassment, where employees are treated with dignity and respect. This policy is framed in accordance with the provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** ("the Act").

2. Scope

This policy applies to all employees (permanent, temporary, trainees, interns, and consultants), across all locations of the Company.

3. Definition of Sexual Harassment

Sexual harassment includes, but is not limited to, any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- Physical contact or advances
- A demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Sexual harassment may occur in person or through electronic means such as emails, texts, social media, or calls.

4. Redressal Mechanism

As the Company currently does not have an Internal Complaints Committee (ICC), any complaint of sexual harassment must be submitted in writing and will be placed directly before the **Board of Directors** for review and appropriate action.

a. How to File a Complaint

- Any aggrieved employee may submit a written complaint, signed and dated, within **3 months** of the alleged incident.
- Complaints can be submitted to the Company Secretary or any Whole-Time Director, who will ensure it is placed before the Board at the next meeting or through a specially convened board discussion, if urgency demands.

b. Board Review

- The Board will review the complaint confidentially and take appropriate steps, including but not limited to inquiry, disciplinary action, or legal recourse, in line with the principles of natural justice.

- Both the complainant and the respondent will be given a fair opportunity to be heard.

5. Confidentiality

The identity of the complainant, respondent, and any witnesses, as well as all proceedings under this policy, shall be kept strictly confidential to protect the dignity and privacy of all parties involved.

6. Protection Against Retaliation

The Company prohibits any form of retaliation against employees who, in good faith, report sexual harassment or cooperate in an investigation.

7. Disciplinary Action

If the complaint is found to be genuine, the Board may initiate appropriate disciplinary action against the accused, which may include a warning, reprimand, transfer, demotion, suspension, or termination of employment.

8. False Complaints

While this policy encourages employees to report genuine grievances, malicious or knowingly false complaints will result in appropriate disciplinary action against the complainant.

9. Display of Policy

This policy shall be displayed at conspicuous places in the office premises and be made available to all employees.