

## HR POLICY MANUAL

Section 5	ESTABLISHMENT RULES
Policy No.PP5-1.12	Prevention of Sexual Harassment at Work Place
Release Date	April 01, 2022
Issued by	CHRO
Supersedes	PP5-1.12 dated April 12, 2019
Valid Up to	March 31, 2025
Pages	9

### 1. Preamble :

Blue Star Limited is committed to providing a safe and productive work environment, an environment that promotes the confidence to work, to innovate and to perform without fear of any type of harassment. Sexual harassment at workplace violates a person's sense of dignity, is against the fundamental rights and basic human rights. It is also contrary to our policy on Equal Employment opportunities. It is therefore our duty, as a responsible Organization, to prevent and deter such harassment by taking all steps required and accordingly this policy has been formulated.

In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has framed the policy for Prevention of Sexual Harassment at Workplace and adopted the same. Vide notification dated 9th December, 2013, Ministry of Women and Child Development have introduced Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013. The existing policy has incorporated necessary requirements arising out of the said rules and procedures as mandated in the said notification.

### 2. Commitment

Blue Star Limited is committed to providing a work environment that is professional and mature, free from animosity and one that reinforces our value of integrity that includes respect for the individual.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment. Further, the Company will also not tolerate sexual harassment of any woman who is not an employee at its workplace.



### 3. Purpose

Every employee has the right to work in an environment free from Sexual harassment, intimidating or offensive behaviour and in which issues of sexual harassment will be resolved without fear of reprisal. Sexual Harassment of employees may include, but is not limited to, physical contact; written and oral remarks, gossip, jokes and sexual banter, defamatory or offensive language and comments; and bullying, where persons abuse through insulting, intimidating or malicious sexual behaviour OR implied or explicit promise of preferential treatment/detrimental treatment/threat about present or future employment status or interference with work or creating hostile work environment.

### 4. Scope and Effective Date

This policy applies to all categories of employees of Blue Star Limited in India, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites. Blue Star will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates against BSL employees and will seek appropriate actions and remedy as provided under the rules and regulations under POSH Act. This policy is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. The workplace includes:

- All offices or other premises where the Company's business is conducted
- All Company-related activities performed at any other site away from the company's premises
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relation

### 5. Policy

Blue Star Limited has zero-tolerance for sexual harassment and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

The Company believes that all employees have the right to be treated with dignity. Sexual harassment will not be permitted or condoned within Company whether it is based on a person's race, colour, ethnic, regional, or national origin, age, gender, real or suspected sexual orientation, religion or perceived religious affiliation, disability, or other personal characteristic. Sexual harassment whether physical, verbal, written, graphic, emotional or through gestures intentionally or not, that offend the dignity and morality of a person by fellow employees, supervisors, customers and/ or suppliers will invite serious disciplinary action.



The use of Company's properties, including email, bulletin boards or documents as a vehicle for sexual harassment is prohibited. Further, use of social networking sites for posting objectionable and offensive messages, sexual innuendos which bear references to employees of Blue Star are also strictly prohibited.

#### 6. Sexual Harassment Definition

"Sexual Harassment" has been defined by the Act to include "any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- physical contact or advances
- a demand or request for sexual favors
- making sexually coloured remarks
- showing pornography
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature"
- Where the victim has reasonable grounds to believe that her objection to such unwelcome behaviour would disadvantage her in connection with her work including recruitment/employment or allotment of work, promotion or evaluation of her engagement in any company activity including off-duty
- Where any such act(s) create an intimidating / hostile / offensive work environment and/or affect the persons work performance.

#### 7. Responsibility

Managers are expected to take the necessary steps to ensure that employees have the right to work in an environment free from sexual harassment intimidating or offensive behaviour. Towards that end, managers and supervisors shall consider all complaints directed to their attention, maintain confidentiality to the fullest extent possible, while guiding and facilitating the aggrieved employee in forwarding the complaint to the Internal Complaints Committee as referred under clause #9 below, and disclose all reports of sexual harassment to the designated and appropriate internal resources as mentioned below. Management shall ensure that all investigations are conducted by the designated resource as prescribed under the Act and Rules framed there under to ensure that prompt corrective action is taken where appropriate

All employees are expected to take personal responsibility for upholding Company's standards by treating with dignity and respect, all job applicants, fellow employees, customers, contract and temporary personnel, including apprentices, trainees and any other individuals associated with Company.

Complaints can be made either to the employee's immediate manager or supervisor, or the designated Human Resources Representative or any member of the Internal Complaints Committee as per the comfort of the aggrieved employee.

#### 8. Complaint Mechanism

In conformity with the directive of Supreme Court of India, and in compliance with the Act, an appropriate complaint mechanism in the form of "Internal Complaints Committee" has been constituted in the Company against sexual harassment of women in the work-place for time-bound redressal of the complaint made by the victim.

#### 9. External member:

The external Member is selected by the Company as per the applicable provisions of the Act and the rules framed there under and to ensure expertise and independence at the time of investigation of complaints received

Ms Latha Nambisan who has been nominated as an External Member of the new ICCs, has a unique blend of consulting expertise and corporate experience in the past 37 years. She is Managing Partner in Savitur Business Consulting LLP. Ms Latha commenced her career as Management Trainee in Fertilisers and Chemicals Travancore Ltd, gaining significant experience by managing a large workforce of over 5,000 employees with multiple trade unions. She has also worked with Blue Star where she played a twin role of Head of HR for the Packaged AC Division as well as the Regional Head for HR in South.

#### 10. Internal Complaints Committee (hereinafter referred to as the Committee or Complaints Committee)

## Contact Details of Internal Committee Members

<b>Northern Region:</b>			<b>Western Region:</b>		
<b>North - I</b>			<b>West - I</b>		
<b>Name</b>	<b>Email ID</b>	<b>Contact No.</b>	<b>Name</b>	<b>Email ID</b>	<b>Contact No.</b>
Presiding member:	-	-	Presiding member:	-	-
Ms Priyanka Mishra	<a href="mailto:priyankamishra@bluestarindia.com">priyankamishra@bluestarindia.com</a>	8879270450	Ms Priyanka Mishra	<a href="mailto:priyankamishra@bluestarindia.com">priyankamishra@bluestarindia.com</a>	8879270450
Members:	-	-	Members:	-	-
Mr Srinivas Reddy	<a href="mailto:srinivasreddy@bluestarindia.com">srinivasreddy@bluestarindia.com</a>	9940027767	Mr Srinivas Reddy	<a href="mailto:srinivasreddy@bluestarindia.com">srinivasreddy@bluestarindia.com</a>	9940027767
Mr Sanjay Yerunkar	<a href="mailto:sanjayyerunkar@bluestarindia.com">sanjayyerunkar@bluestarindia.com</a>	9920162240	Mr Sanjay Yerunkar	<a href="mailto:sanjayyerunkar@bluestarindia.com">sanjayyerunkar@bluestarindia.com</a>	9920162240
Ms Deepali Suneja*	<a href="mailto:deepalisuneja@bluestarindia.com">deepalisuneja@bluestarindia.com</a>	9999902007	Ms Thara Nair*	<a href="mailto:tharanair@bluestarindia.com">tharanair@bluestarindia.com</a>	9920025548
Ms Latha Nambisan	<a href="mailto:latha.nambisan@savitur.co.in">latha.nambisan@savitur.co.in</a>	9884449750	Ms Latha Nambisan	<a href="mailto:latha.nambisan@savitur.co.in">latha.nambisan@savitur.co.in</a>	9884449750
*[For the following locations: Delhi and HP - 1 factory]			*[For the following locations: Thane, Wada, Dadra and Ahmedabad factory]		
<b>North - II</b>			<b>West - II</b>		
<b>Name</b>	<b>Email ID</b>	<b>Contact No.</b>	<b>Name</b>	<b>Email ID</b>	<b>Contact No.</b>
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Mr Sanjay Yerunkar	<a href="mailto:sanjayyerunkar@bluestarindia.com">sanjayyerunkar@bluestarindia.com</a>	9920162240	Mr Sanjay Yerunkar	<a href="mailto:sanjayyerunkar@bluestarindia.com">sanjayyerunkar@bluestarindia.com</a>	9920162240
Ms Deepali Suneja*	<a href="mailto:deepalisuneja@bluestarindia.com">deepalisuneja@bluestarindia.com</a>	9999902007	Ms Roshni Rasal*	<a href="mailto:roshnirasal@bluestarindia.com">roshnirasal@bluestarindia.com</a>	8108101132
Ms Latha Nambisan	<a href="mailto:latha.nambisan@savitur.co.in">latha.nambisan@savitur.co.in</a>	9884449750	Ms Latha Nambisan	<a href="mailto:latha.nambisan@savitur.co.in">latha.nambisan@savitur.co.in</a>	9884449750
[For the following locations: Chandigarh, Ghaziabad, Gurugram, Jaipur, Lucknow, Ludhiana, Delhi and HP - 2 factory]			[For the following locations: Band Box House, Sakinaka, Kasturi Buildings, Goa, Baroda, Indore, Nagpur, Pune, Raipur, Ahmedabad, and International employees]		

<b>Eastern Region:</b>			<b>Southern Region:</b>		
<b>East</b>			<b>South - I</b>		
<b>Name</b>	<b>Email ID</b>	<b>Contact No.</b>	<b>Name</b>	<b>Email ID</b>	<b>Contact No.</b>
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Mr Sanjay Yerunkar	<a href="mailto:sanjayyerunkar@bluestarindia.com">sanjayyerunkar@bluestarindia.com</a>	9920162240	Mr Sanjay Yerunkar	<a href="mailto:sanjayyerunkar@bluestarindia.com">sanjayyerunkar@bluestarindia.com</a>	9920162240
Ms Vinita Ray*	<a href="mailto:vinitar@bluestarindia.com">vinitar@bluestarindia.com</a>	9830995564	Ms Sreedevi D*	<a href="mailto:sreedevi@bluestarindia.com">sreedevi@bluestarindia.com</a>	9989690000
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[For the following locations: Bhubaneswar, Guwahati, Jamshedpur, Kolkata, Patna]			[For the following locations: Bengaluru and Secunderabad]		
			<b>South - II</b>		
			<b>Name</b>	<b>Email ID</b>	<b>Contact No.</b>
			Presiding member:	-	-
			Ms Priyanka Mishra	<a href="mailto:priyankamishra@bluestarindia.com">priyankamishra@bluestarindia.com</a>	8879270450
			Members:	-	-
			Mr Srinivas Reddy	<a href="mailto:srinivasreddy@bluestarindia.com">srinivasreddy@bluestarindia.com</a>	9940027767
			Mr Sanjay Yerunkar	<a href="mailto:sanjayyerunkar@bluestarindia.com">sanjayyerunkar@bluestarindia.com</a>	9920162240
			Ms Komalam G*	<a href="mailto:gkomalam@bluestarindia.com">gkomalam@bluestarindia.com</a>	9677025005
			Ms Latha Nambisan	<a href="mailto:latha.nambisan@savitur.co.in">latha.nambisan@savitur.co.in</a>	9884449750
			[For the following locations: Chennai, Coimbatore, Kochi, Thiruvananthapuram, Vijayawada, Vishakhapatnam & Sri City]		



The aforesaid seven ICCs have been constituted to live up to the commitment to provide safe working environment to women at Blue Star.

Any complaint or concern may be first taken up with the local representative who would then escalate the matter to the concerned ICC for initiating necessary action. Alternatively, the complaint may be lodged with any of the aforesaid ICC members who would then request the concerned regional ICC to look into the complaint.

Tenure of the Committee: This committee will be in tenure for 3 years

Note:

Committee will be responsible for any complaints received on account of sexual harassment throughout the Company. The Committee members may be revised from time to time, as per Management discretion.

The Internal Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

#### 11. Procedure for Resolution, Settlement or Prosecution of Acts of Sexual Harassment:

##### a. Informal Resolution Options

- i. When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently
- ii. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Internal Complaints Committee for redressal of her grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

##### b. Complaints

- i. Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Central Complaints Committee or the Regional Complaints Committee constituted by the Management



- ii. The complainant shall submit 6(six) copies of the Complaint to the Complaint Committee along with supporting documents and the names and addresses of the witnesses in writing and can be in form of a letter, preferably within 30 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose her name, department, division and location she is working in, to enable the committee to contact her and take the matter forward.
- iii. Delay in Filing the Complaint:- A complaint relating to sexual harassment shall ordinarily be referred within 30 days from the date of the alleged offence and the delay if any, in referring such complaint may be condoned by the Complaints Committee provided that the complainant submits sufficient cause for such delay and the Complaints Committee is satisfied with the reasons for the delay. Any perceived delay in filing a complaint under this Policy, by itself, shall not be a relevant factor in deciding the veracity of the complaint or in appreciating evidence presented.
- iv. The Complaint Committee shall send 1(one) of the copies received from the aggrieved woman to the accused (respondent) within a period of 7 working days.
- v. The Accused (respondent) shall file his reply to the Complaint along with supporting documents and the names and addresses of the witnesses, within a period not exceeding 10 working days from the date of receipt of the documents.
- vi. The Complaint committee have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Aggrieved (complainant) or Accused (respondent) fails, without sufficient cause, to present herself or himself for 3 consecutive hearings convened by the Chairperson, as the case may be, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.
- vii. In conducting the enquiry, a minimum of 3 members of the complaints committee including the external member, as the case may be shall be present
- viii. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Complaints Committee
- ix. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the CHRO as soon as practically possible and in any case, not later than 90 days from the date of completion of inquiry. The Employer shall act upon the recommendation within 60 days of its receipt by him
- x. The Complaint's Committee report will also be made available to concerned parties



- xi. Punishments : Where the Complaints Committee arrives at the conclusion that the allegation against the respondents been proved, it shall recommend to the CHRO to take action which may include the following:
  - Written apology;
  - Warning;
  - Reprimand or Censure;
  - Withholding of Promotion;
  - Withholding of pay rise or increments; or
  - Terminating the respondent from service; or
  - Undergoing a counseling session or carrying out community service.

xii. Appeals: The provisions relating to appeals, revision and review as per the existing Acts, rules or regulations governing misconduct or offence as applicable to a workplace. Appeals may be preferred by any person aggrieved from the recommendations of the Complaint Committee to the Court or Tribunal in accordance with the rules framed under this Act

xiii. Punishment for False or Malicious Complaint And False Evidence :  
Where the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the CHRO to take action in accordance with the provisions of the service rules applicable to her or him.

12. Leave of absence for attending enquiry

Complaints Committee at its discretion has the authority to grant leave to the victim up to a maximum of 3 months, over and above the regular leave as per service rules, for attending enquiries

13. Confidentiality

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances

14. Access to reports and documents to the victim

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.





15. Protection to the Complainant / Victim

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 victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

16. Employee Education / Communication :

All employees will be made aware of this policy by posting this policy on the Company WAN (Wide Area Network), along with the other Company policies and communicated to all the employees about this new policy. CHRO will review the trend of the complaints received under this policy on a quarterly basis for necessary corrective actions.

17. In case of any inconsistency between this policy and the Act or rules framed there under, the provisions of the Act or rules framed there under as may be amended from time to time, shall prevail.

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