

HR POLICY MANUAL

Section 5	ESTABLISHMENT RULES
Policy No.PP5-1.12	Prevention of Sexual Harassment at Workplace
Release Date	April 1,2025
Issued by	CHRO
Supersedes	PP5-1.12 dated March 29,2024
Valid Up to	January 22, 2026
Pages	11

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 the workplace violates a person's sense of dignity, is against 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 the Prevention of Sexual Harassment at the Workplace and adopted the same. Vide notification dated 9th December 2013, the Ministry of Women and Child Development has introduced Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

Section 18 of the Act, which addresses the protocol for appealing against decisions made by the Internal Committee, utilizes the term 'any person' eligible to file an appeal. This implies that the aggrieved party in question can be a man, woman, or an individual identifying with any other gender identity. Section 2 (m) of the POSH Act defines the term 'Respondent' to encompass all genders. 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 all the individuals.

The Company has zero tolerance for sexual harassment and is committed to ensuring a safe, respectful work environment for all. This commitment extends to everyone at the workplace, including clients, customers, visitors, and others who may not be employees of Blue Star.

**3. Purpose:**

Every individual has the right to work in an environment free from Sexual harassment, intimidating or offensive behavior and in which issues of sexual harassment will be resolved without fear of reprisal. Sexual Harassment may include, but is not limited to, physical contact; sexually coloured written and oral remarks, gossip, jokes and sexual banter, sexually defamatory or sexually offensive language and comments; and bullying, where any individual abuses through malicious sexual behaviour or insulting or intimidating, 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 against any kind of sexual favour.

4. Scope and Effective Date:

This policy applies to all categories of employees of Blue Star Limited and it's wholly owned subsidiaries in India, including permanent management and workmen, temporaries, trainees, and employees on contract at its workplace or at client sites as well as any person who visits any workplace of the organization. Blue Star will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates against Blue Star Limited employees or vice versa and will seek appropriate actions and remedies as provided under the rules and regulations under the 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
- All locations of the Company (Workplace). The possible locations could be:
 - a. Any of the business locations of the Company including virtual workplaces; OR
 - b. Any external location visited by Employee due to or in the course of employment with the Company, such as business locations of other organizations/entities, guest houses, hotels, etc., OR
 - c. Any mode of transport provided by the Company (or a representative of the Company) to an Employee for undertaking a journey to and from the locations mentioned above.
 - d. Online meetings and calls

5. Policy:

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



gender bias, and sexual harassment.

The Company believes that every person has the right to be treated with dignity. Sexual harassment will not be permitted or condoned within the 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 another 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, the use of social networking sites for posting objectionable and offensive messages, and sexual innuendos that bear references to employees of Blue Star are also strictly prohibited.

6. Definitions:

"Act" means "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and any amendment thereto.

"Internal Committee" or "IC" means a committee by that name, constituted by the Board of Blue Star as per the provisions of the Act.

"Sexual Harassment" has been defined by the Act to include "any one or more of the following unwelcome acts or behaviors (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 their objection to such unwelcome behavior would disadvantage them in connection with their work including recruitment/employment or allotment of work, promotion or evaluation of their engagement in any company activity including off-duty
- Where any such act(s) creates an intimidating/hostile / offensive work environment and/or affects the person's work performance.

7. Responsibility:

Management is expected to take the necessary steps to ensure that every person has the right to work in an environment free from sexual harassment intimidation 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 person in forwarding the complaint to the Internal Committee as referred under clause #10 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 Committee as per the comfort of the aggrieved employee.

8. Complaint Mechanism:

An appropriate complaint mechanism in the form of "Internal Committee" has been constituted to deal with complaints relating to sexual harassment in the workplace 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. Mrinalini Kher, nominated as an External Member of the Internal Committees (ICs) of Blue Star Limited, is a respected social entrepreneur with a lifelong distinguished track record in community development and women's empowerment. She serves as a Trustee of the Kherwadi Social Welfare Association (KSWA) and the Blue Star Foundation, and is a member of the Advisory Board at Step Academy, a project by Ajeevika Founder, Udaipur. She is also associated with the POSH Internal Committees of several corporates for more than 13 years and regularly conducts workshops on workplace sexual harassment laws. Mrinalini plays a key leadership role in Yuva Parivartan (YP)—a project of KSWA—where she is actively involved in fundraising, public relations, event organization, counseling, trust affairs, and engaging with grassroots social issues. Her efforts have led to the successful organization of seven International Summits on Livelihood & Employment, six Career Fairs, and the "Breaking Barriers, Standing Tall" event, which celebrates and recognizes women achievers as role models.

Ms. Sneha Khandekar, a seasoned professional who has been nominated as an External Member of the ICs of Blue Star Engineering and Electronics Limited and

Blue Star Climatech Limited, has vast experience of 36 years in social service with various NGOs, she currently serves as a Consultant Coordinator at Savitribai Phule Gender Resource Center of Municipal Corporation of Greater Mumbai and a Faculty Instructor at College of Social Work, Nirmala Niketan.

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

Contact Details of Internal Committee Members at Blue Star Limited

Date of Constitution – April 1, 2025

Northern Region:		
Name	Email ID	Contact No.
<u>Presiding Member:</u>	-	-
Pallavi Gurjar	pallavigurjar@bluestarindia.com	9920283031
<u>Members</u>	-	-
Senthil Thangam S	senthilthangam@bluestarindia.com	8754573001
Mangesh Valve	mangeshvalve@bluestarindia.com	9004044717
Gunika Arora*	gunikaarora@bluestarindia.com	9810847127
Mrinalini Kher (External Member)	mrinalinikher@gmail.com	9819691851
*[For the locations: Delhi, HP factory, Chandigarh, Ghaziabad, Gurugram, Jaipur, Lucknow, Ludhiana]		
Western Region:		
Name	Email ID	Contact No.
<u>Presiding Member:</u>	-	-
Pallavi Gurjar	pallavigurjar@bluestarindia.com	9920283031
<u>Members:</u>	-	-
Senthil Thangam S	senthilthangam@bluestarindia.com	8754573001
Mangesh Valve	mangeshvalve@bluestarindia.com	9004044717
Prachi Bansal*	prachibansal@bluestarindia.com	7506518724
Mrinalini Kher (External Member)	mrinalinikher@gmail.com	9819691851
*[For the locations: Band Box House, Sakinaka, Kasturi Buildings, Goa, Baroda, Indore, Nagpur, Bhopal, Surat, Godrej Vikhroli, Pune, Raipur, Ahmedabad, International Employees, Thane, AMA Centre, Wada Factory, Dadra Factory and Ahmedabad factory]		

Eastern Region:		
Name	Email ID	Contact No.
Presiding Member:	-	-
Pallavi Gurjar	pallavigurjar@bluestarindia.com	9920283031
Members:	-	-
Senthil Thangam S	senthilthangam@bluestarindia.com	8754573001
Mangesh Valve	mangeshvalve@bluestarindia.com	9004044717
Sutapa Dutta*	sutapadutta@bluestarindia.com	9563284255
Mrinalini Kher (External Member)	mrinalinikher@gmail.com	9819691851
*[For the locations: Bhubaneshwar, Guwahati, Ranchi, Kolkata, Patna]		
Southern Region:		
Name	Email ID	Contact No.
Presiding Member:	-	-
Pallavi Gurjar	pallavigurjar@bluestarindia.com	9920283031
Members:	-	-
Senthil Thangam S	senthilthangam@bluestarindia.com	8754573001
Mangesh Valve	mangeshvalve@bluestarindia.com	9004044717
Sujatha Deepak*	sujathadeepak@bluestarindia.com	8754481472
Mrinalini Kher (External Member)	mrinalinikher@gmail.com	9819691851
*[For the locations: Bengaluru, Secunderabad, Chennai, Coimbatore, Kochi, Thiruvananthapuram, Vijayawada & Vishakhapatnam]		

Contact Details of IC Members of Blue Star Engineering and Electronics Limited

Date of Constitution – December 13, 2023

Name	Email ID	Contact No.
Presiding Member:	-	-
Sangeeta Parmeswaran	sangeetaparmeswaran@bluestarindia.com	9833232042
Members:	-	-
Yogesh Joshi	yogeshjoshi@bluestarindia.com	9987557556
Mandar Hublikar	mandarhublikar@bluestarindia.com	9833529935
Sneha Khandekar (External Member)	snehakhandekar@hotmail.com	9819770166

Contact Details of IC Members of Blue Star Climatech Limited

Date of Constitution – January 23, 2023

Name	Email ID	Contact No.
<u>Presiding Member:</u>	-	-
Neha Roy	neharoy@bluestarclimatech.com	9930259709
<u>Members:</u>	-	-
Sivakumar Ramani	sivakumarr@bluestarclimatech.com	8655001792
Naveen Kumar P	naveenkumarp@bluestarclimatech.com	9884062028
Rama Devi B	ramadevi@bluestarclimatech.com	9490428426
Sneha Khandekar (External Member)	snehakhandekar@hotmail.com	9819770166

The aforesaid ICs have been constituted to live up to the commitment to provide a safe working environment at Blue Star and its wholly owned subsidiaries.

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

Tenure of the Committee: The tenure of the committee is for 3 years from the date of constitution.

Note:

The respective 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 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 SexualHarassment:

a. Informal Resolution Options

- When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.



- ii. If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Committee for redressal of their grievances. The Internal Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.
- iii. Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved person.

b. Complaints

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 Internal Committee constituted by the Management.

- i. The complainant shall send their complaint in writing or through an email to the Internal Committee along with supporting documents and the names and addresses of the witnesses, preferably within 30 days from the date of occurrence of the alleged incident. Alternatively, the complainant shall file the complaint in the manner as provided in the legislation. The employee is required to disclose their name, department, division and location they are working in, to enable the committee to contact the complainant and take the matter forward.
- ii. 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 Internal Committee provided that the complainant submits sufficient cause for such delay and the Internal 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.
- iii. The Internal Committee shall send 1(one) of the copies received from the aggrieved (complainant) to the accused (respondent) within a period of 7 working days.
- iv. The Accused (respondent) shall file their 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.
- v. The Internal 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.



- vi. 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. Such enquiry conducted by the Internal Committee would also be termed as the departmental enquiry as per internal policies as well as any other law applicable to the classification of employees and IC's recommendation would be considered as binding on the employer.
 - vii. 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 Internal Committee.
 - viii. The Internal Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the CHRO within 10 days of completion of such investigations and inquiry and such report shall be made available to the concerned parties as well. The Employer shall act upon the recommendation within 60 days of its receipt by him.
 - ix. The Internal Committee report will also be made available to concerned parties.
- d. Punishments: Where the Internal 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 any and not restricted to 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.
- e. 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 Internal Committee to the Court or Tribunal in accordance with the rules framed under this Act.
- f. Punishment for False or Malicious Complaint And False Evidence: Where the Internal Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person 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:

The Internal Committee at its discretion has the authority to grant leave to the victim up to a maximum of 3 months, over and above 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 person 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. Education / Communication:

All concerned 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 communicating to all the concerned persons about this policy. CHRO will review the trend of the complaints received under this policy on a quarterly basis for necessary corrective actions.

17. Training and awareness:

All employees, staff (across all levels and grades), and associates will be required to undergo periodic awareness and refresher training on the POSH policy, including guidance on acceptable and unacceptable workplace behaviour, facilitated by the HR team. Participation in these sessions is mandatory, and non-compliance will lead to appropriate disciplinary action.

18. Legal Compliance:

The IC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act). The report shall have the following details:

- number of complaints of Sexual harassment received in the year
- number of complaints disposed of during the year
- number of cases pending for more than 90 days
- number of workshops or awareness program against Sexual Harassment carried outs
- nature of action taken by the employer or District Officer

19. The Management Assurance:

- a) Express prohibition of sexual harassment will be notified and circulated.
- b) Prohibition of sexual harassment is included in the Code of Conduct of the company.
- c) Complainants or witnesses will not be victimized or discriminated against while dealing with complaints.

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 all employees with a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.