



BLS POLYMERS LTD.
Excellence in Compounding

**PREVENTION OF SEXUAL
HARASSMENT AT
WORKPLACE POLICY**



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(Pursuant to the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013)

At BLS Polymers Limited, we are committed to fostering a safe, respectful, and inclusive workplace for all employees, stakeholders, and visitors. We believe that a work environment built on dignity, trust, and equality is essential for organizational growth and employee well-being.

BLS Polymers Limited, is committed to providing a workplace that is free from sexual harassment, where employees, regardless of their gender, feel safe, respected, and protected. The Company promotes a culture of dignity, equality, and mutual respect.

This policy has been formulated in accordance with the provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** (“Act”) and the rules notified thereunder.

BLS Polymers Limited shall provide healthy working environment that enables employees to work without fear of prejudice, gender bias, sexual harassment and all forms of intimidation or exploitation. The company believes that all stakeholders, irrespective of their gender, have the right to be treated with dignity.

In continuation with our endeavour towards improved gender diversity and inclusion along with creating a safe, fair and just workplace, we have put together this policy called Prevention of Sexual Harassment at Workplace.

In accordance with this policy, committee and detailed guidelines have been formed to address the issue of sexual harassment at workplace. All employees (permanent, temporary, contract) as well as trainee, visitors to our office premises or service providers are covered under the policy.

If someone has crossed a line, then refer to the guidelines on Prevention of Sexual Harassment at workplace and report to the Internal Complaint Committee (“ICC”).

POLICY ON SEXUAL HARASSMENT OF EMPLOYEES IN BLS POLYMERS LIMITED

1. POLICY

BLS Polymers Limited give equal employment opportunity to the employees and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias, eradicate the fear of hostile work environment and sexual harassment. The company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at work place or other than work place if involving employees is a grave offence and is, therefore, punishable.



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2. OBJECTIVES OF THE POLICY

- Provide work environment free from fear, reprisal, coercion, discrimination and harassment of sexual nature;
- Define sexual harassment and provide a clearly stated codified redress for any sexual harassment occurring at workplace;
- Enable all those working or associated with the Company or visiting the Company premises to raise their concerns and make complaints without any fear;
- Express zero tolerance to any sexual harassment at workplace through prevention, resolution and deterrence of acts of sexual harassment;
- Provide procedure for resolution, settlement or prosecution complaints of sexual harassment; and promote awareness and prevention of sexual harassment in the premises.
- Ensure redressal in a time-bound manner.
- Conduct fair inquiry and reach reasonable decision in a timely manner.

3. SCOPE & APPLICABILITY

1. This policy applies to:

- All employees, including permanent, temporary, contractual, interns, and trainees.
- Any work-related interactions or events occurring outside the premises.
- Directors, board members, and senior management.
- Vendors, suppliers, clients, consultants, and visitors interacting with the company.
- All company premises, digital workspaces, off-site work locations, and work-related events.

However, this policy shall subject to be reviewed & updated by the Board from time & time

2. Sexual harassment would mean and include any of the following:

- Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluative of a person towards company activity;
- Unwelcome sexual advances involving verbal, non - verbal, or physical conduct such as sexually coloured remarks, jocks, letter, phone calls, e-mail, gestures, SMS, post on social media, showing pornography, lurid stares, physical contact or molestation, stalking, sounds, display of picture, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;



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- Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to person belonging to the other sex;
- Conduct of such an act at work place or outside in relation to an employee of BLS Polymers Limited, or vice versa during the course of employment; and any unwelcome gesture by an employee having sexual overtone;

“Employee” means any person on the rolls of the company including those on deputation, contract, temporary, part time or working as consultant.

“Workplace” shall include all offices, factories and depots of BLS Polymers Limited and any place visited by the employee arising out of or during the course of their employment including transportation provided by the Company for undertaking such journey.

“Aggrieved Person” shall mean any person (employed or associated with the Company Company) who complained of sexual harassment.

“Respondent” shall mean any person (employed or associated with the Company) against whom Aggrieved Person has complained under this Policy.

4. COMPLAINT REDRESSAL COMMITTEE / INTERNAL COMPLAINT COMMITTEE

1. Not less than half of the members of the ICC shall be women and the member of the ICC shall comprise of:
 - a. one presiding officer who shall be a senior level woman employee of the Company
 - b. not less than two members from employees committed to the cause of women or
 - c. who have experience in social work or have legal knowledge; and
 - d. one member from an NGO or association committed to the cause of women or a person who is familiar to issues relating to sexual harassment.
2. The members of ICC shall hold office for a period not exceeding 3 years from the date of nomination.
3. A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the presiding officer of ICC, one member of ICC and the third party representative / NGO member.
4. Internal Complaints Committee will comprise of the following:

	Mrs. Neha Kumar Sunit		Chairperson
	Mrs. Shivani Mishra		Member
	Mr. Ashish Jain		Member



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	Ms. Kunika Bhalotra		Member
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5. A quorum of 3 members is required to be present for proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.
6. Any person who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with her/his signature within three months of occurrence of incident.
7. The committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
8. The committee will hold a meeting with the complainant within five days of the receipt of the complaint, but not later than a week in any case.
9. At the first meeting, the Committee members shall hear the complainant and record her/his allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his/her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employee involved and male officer for male employees, involved shall meet and record the statement.
10. Thereafter, the person against whom complaint is made may be called for a deposition before the committee and an opportunity will be given to him / her to give an explanation, where after, an “ENQUIRY” shall be conducted and concluded.
11. In the event, the complaint does not fall under the purview of sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording of reasons thereof.
12. In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action up to and including termination of employment by the Management.

5. ENQUIRY PROCESS

- i. The committee shall immediately process with enquiry and communicate the same to the complainant and person against whom complaint is made.



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- ii. The committee shall prepare and hand over the statement of allegation to the person against whom complaint is made and give him/her an opportunity to submit a written explanation if she/he so desires within seven days of receipt of the same.
- iii. The complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- iv. If the complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the committee the names of witness/es to whom they propose to call.
- v. If the complainant desires to tender any documents by way of evidence before the committee, she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the committee, he /she shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be original copies.
- vi. The committee shall call upon all witness mentioned by both the parties.
- vii. The committee shall provide every reasonable opportunity to the complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- viii. The committee shall complete the “Enquiry” within reasonable period but not beyond 90 days and communicate its findings and its recommendations for action to the Head (HR & Admin). The reports of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightway.
- ix. The Head (HR & Admin) will direct appropriate action in accordance with the recommendations proposed by the committee.
- x. The committee shall be governed by the Prevention of Sexual Harassment of Workplace (POSH) Act, 2013 and allied rules and such rules as may be framed by the Legislature or any other legislation enacted later on.

6. COMPLAINT RESOLUTION

The Aggrieved person should attempt to indicate to the person indulging in the sexually offensive behaviour that the behaviour is unwelcomed, and specifically requesting the Respondent to stop the behaviour. Where the Aggrieved person feels that they cannot ask the Respondent to stop offensive behaviour, or in spite of having done the same, behaviour continues, they may ask for the behaviour to be dealt with under the Policy’s grievance procedure.



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It is important that the Aggrieved person keeps a written record of dates, times, details of the conduct and witnesses, if any. Each complaint should at the minimum be specific as to:

- Nature of sexual harassment.
- Identity of the person involved in the acts of sexual harassment
- Facts and circumstances in support of the complaint
- List of witnesses

The Aggrieved person can inform and approach any ICC member with a written complaint on, with supporting documents and list of witnesses within a period of 3 months from the date of the incident/s. In case the Aggrieved Person is not able to register complaint due to any physical incapacity, complaint can be registered with written consent from the Aggrieved Person either by relative, friend, colleague, an officer of the National Commission for Women or State Women's Commission or any other person who has knowledge of the incident.

7. DISCIPLINARY ACTION

The disciplinary action shall be recommended by ICC and will be imposed by the management based on severity of harassment and its impact on the Aggrieved Person. It could be either one or combined actions as given below:

- i. written apology;
- ii. warning and taking a written bond of good conduct;
- iii. reprimand or censure;
- iv. withhold promotion till such period mentioned;
- v. withhold pay rise or increments of pay till such period mentioned;
- vi. termination from service;
- vii. undergo counselling session;
- viii. perform Community service;
- ix. compel the Respondent to pay a reasonable amount of compensation to the complainant. Deduction of sum from salary or wages of the Respondent as it may be considered appropriate by the Management to be paid to the Aggrieved Person. In case deduction from salary / wages is not possible due to absence or cessation from employment, Respondent can be directed to pay the amount to the Aggrieved Person; and
- x. where an outsider is the perpetrator in addition to assisting the Aggrieved Person to initiate action under the Bhartiya Nayay Sanhita, 2023 or any other law for the time being in force, the Management shall also pass and implement necessary orders restricting the perpetrator's entry into the premises and forewarn them of criminal/legal action in



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8. OTHER POINTS TO BE CONSIDERED

1. The committee may recommend to the Head (HR & Admin) action which may include transfer or any other appropriate disciplinary action up and including termination of employment.
2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of the policy.
3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, BLS Polymers Limited shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
4. The committee shall analyze and put-up report on all complaints of this nature at the end of the year for submission to Head (HR & Admin).
5. In case the committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Compliant.
6. Nothing in these guidelines should be taken in any way as a limitation on the powers of the Management Team to decide what disciplinary action(s) is appropriate under given circumstances.

9. CONFIDENTIALITY

All inquiries, complaints and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. The identity of the complainant, respondent, and witnesses, and all details of the inquiry proceedings shall be kept confidential. However, the identity of the complainant usually is revealed to the accused and witnesses. All individuals contacted in connection with a complaint will be counselled that any information pertaining to the complaint shall be held in confidence.

(Revised policy approved in Board Meeting dated 5th April, 2025)