



STORAGE TECHNOLOGIES AND AUTOMATION LIMITED

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## PREVENTION OF SEXUAL HARRASSMENT POLICY

**STORAGE TECHNOLOGIES AND AUTOMATION LIMITED**

**CIN: L74900KA2010PLC052918**

Registered Office: No 10, Survey No 21/6A, 21/7A, 21/7B and 21/8, Singanayakanahalli,  
Yelahanka Post, Bangalore - 560064. Karnataka, INDIA.

**Telephone No.: +91 7353167825 | E-mail: [cs@racksandrollers.com](mailto:cs@racksandrollers.com)**

**Website: [www.racksandrollers.com](http://www.racksandrollers.com)**



# PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

## Introduction

At **STORAGE TECHNOLOGIES AND AUTOMATION LIMITED** (“the Company”), we are committed to providing a safe, respectful, and inclusive work environment in which all individuals are treated with dignity and are free from discrimination and harassment. This Prevention of Sexual Harassment (POSH) Policy is formulated in accordance with the **Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013** (“POSH Act”) and the rules made thereunder.

## Objective

The objectives of this Policy are to:

- Provide a safe and harassment-free workplace for all employees.
- Establish an effective redressal mechanism for complaints of sexual harassment.
- Promote a culture of respect, equality, and inclusivity.

## Scope

This Policy applies to:

- All employees, including permanent, temporary, contractual employees, consultants, interns, trainees, and apprentices.
- Visitors, customers, vendors, suppliers, and any third parties interacting with the Company.
- All workplaces, including the Company’s premises, work-related events, official travel, and any location where an employee represents the Company.

## Definition of Sexual Harassment

- Sexual harassment includes any unwelcome act or behavior (whether directly or by implication), against any person, such as:
  - Physical contact and advances.
  - A demand or request for sexual favors.
  - Making sexually colored remarks.
  - Showing pornography.

- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature, including electronic harassment through emails, messages, or social media.

## Responsibilities of the Employer

The Company shall:

- Provide a safe working environment.
- Display and make available this POSH Policy at all office locations.
- Constitute an Internal Complaints Committee (ICC) as per the Act.
- Conduct regular awareness and training programs for employees.
- Assist the ICC in conducting inquiries and implementing recommendations.

## Internal Complaints Committee (ICC)

### Composition

The ICC shall consist of: -

**Presiding Officer:** A senior employee of the Company.

**Two Members:** Employees committed to the cause of gender equality or having legal knowledge or experience in social work.

**One External Member:** From an NGO or association committed to the cause of gender equality or familiar with issues relating to sexual harassment.

### Responsibilities

The ICC shall:

- Receive and inquire into complaints of sexual harassment.
- Conduct fair, unbiased, and timely investigations.
- Submit inquiry reports and recommendations to the employer.
- Maintaining strict confidentiality throughout the process as per established guidelines
- Ensure that a fair dispute/ complaint and dialogue procedure is carried forward which does not undermine the complainant's rights and also minimize the need for purely punitive actions which may cause further resentment, alienation and violence

- Protect the identity of the complainant and also provide safe spaces like relaxation of attendance or transfer of employee to another department till the pendency of the hearing
- Ensure protection of complainant and witnesses for prevention of discrimination and intimidation in any manner
- Ensure prohibition of retaliation and adverse action against the protected individual (complainant)
- Provide aid to the employee if she wants to file a complaint to the police.
- Prepare and submit annual report as required under the Act.

### **Powers of the Internal Committee**

- It is entitled to initiate an inquiry into the complaint of a sexual harassment incident at the workplace.
- It can summon witnesses and parties before the committee to give a statement.
- It can assert its powers and summon evidence to be examined if it is deemed necessary to do so by the Committee.

**Once the inquiry is completed and if the Internal Complaint Committee finds the person guilty, it is well within its right to prescribe the following actions:**

- Initiate action against the culprit in accordance with the service rules of the organization.
- In the absence of service rules, it can take actions like a warning, community service, withholding promotion, termination, etc.
- It can deduct from the salary of the respondent as compensation to be paid to aggrieved women.

### **Procedure for lodging complaint**

- Any aggrieved person herein after referred to as complainant may make complaint in writing of sexual harassment against an employee or 3rd party.
- Where such complaint is not made in writing the presiding officer or any of the member of the ICC as the case may be shall render all reasonable assistance to the Complainant for making complaint in writing.

- If the aggrieved woman is unable to make complaint because of her physical or mental incapacity death or otherwise then such person as authorized under the Act may make a complaint
- The complainant can make or lodge a complaint of sexual harassment with ICC within a period of three months from the date of the occurrence of the alleged incident and in case of series of incidents within three months of the date of the last incident.
- Internal committee may for reason to be recorded in writing extend the time limit not exceeding three months if it is satisfied that circumstances where such which prevented the woman from filing a complaint within the said period.
- At the time of filing the complaint the complainant is required to submit to the Internal committee one copy of the complaint in the format prescribed in annexure along with supporting documents and evidence supporting the said matter.
- In case a department head or a member of a human resource team receives an oral complaint of sexual harassment at workplace the aggrieved woman making the complaint must be informed to make the written complaint to the presiding officer and shall render all the reasonable resistance to the woman for making the complaint in writing
- In addition if any department head Or member of human resource team receives a written complaint of sexual harassment at workplace the same should be forwarded to the presiding officer.

### **Procedure after receiving a complaint from the complainant**

- On receiving a complaint from the complainant If the presiding officer is of the opinion that prima facie no case of sexual harassment at the workplace is made out the presiding officer shall inform the complainant in writing stating reason within 7 days of receiving complaint.
- If in the opinion of the presiding officer prima facie a case of sexual harassment at workplace is made a copy of the complaint received by it along with support and documents and list of witnesses will be sent to the respondent within seven working days of receiving the complaint.

### **Conciliation On Request Of The Complainant**

- Notwithstanding anything in the contrary contained in this policy if the complainant makes a request to Internal committee for a settlement the Internal committee before initiating enquiry will explore the possibility of a mutual settlement between the complainant and respondent through conciliation however no monetary settlement will be made as a basis of such consolation

- If settlement has been arrived at during the Conciliation proceedings the Internal committee will record the settlement so award arrived and forward the same to the CEO of Storage Technologies and Automation Limited to take any action as specified in its recommendation provide a copy of settlement so recorded to the complainant and the respondent and not conduct an enquiry to the complaint

### **Inquiry Process**

- The ICC shall conduct a fair and impartial inquiry in accordance with the Act.
- Both parties shall be given an opportunity to be heard.
- The inquiry shall ordinarily be completed within **90 days**.

### **Power of Internal Committee in case of Malicious Complaints**

Once the Internal Committee, after an inquiry, gets conclusive evidence that a complaint had been filed with malicious intent, and that an untrue and fallacious complaint has been filed by a complainant, then it shall recommend action against her.

### **Action of the Committee during the pendency of an Inquiry**

The POSH Act also lays down specific guidelines regarding the pendency of a case.

The Internal Complaints Committee, upon receiving a written request, can recommend the following actions during the inquiry pending to the employer:

1. Transfer either the aggrieved or the respondent to any other workplace.
2. Grant leave to the aggrieved women up to three months.
3. Any other relief as may be prescribed.

After the IC submits the report the onus lies on the employer to implement the recommendations of the Internal Complaints Committee.

### **Action on Findings**

Based on the ICC's recommendations, disciplinary action may include:

- Written apology.
- Warning or reprimand.
- Withholding of promotion or pay rise.
- Termination of employment.



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## **Confidentiality**

The identity of the complainant, respondent, witnesses, and details of the proceedings shall be kept strictly confidential, in accordance with the Act.

## **Prohibition of Retaliation**

Any form of retaliation against a person who files a complaint or participates in an inquiry is strictly prohibited and will attract disciplinary action.

## **Awareness and Training**

The Company shall organize workshops, seminars, and training programs periodically to create awareness about this Policy and the redressal mechanism.

## **Malicious or Knowingly False Complaints**

If a complaint is found to be malicious or knowingly false, or if misleading information is provided with intent, appropriate disciplinary action may be taken as per applicable rules. Mere inability to substantiate a complaint shall not attract action.

## **Informing the police**

When the aggrieved woman wishes to register a case with the police the ICC shall record this in writing and forward the complaint to local police station and provide full support to the police during investigation

When agreed woman does not wish to make a police complaint the ICC will record this in writing and inform the agreed woman that whenever she desired to do so ICC will facilitate the same.

In case of rape or previous injury the ICC shall forward the informant or complaint to the police unless agreed women specifically prohibits ICC to do so in the writing

## **Appeal**

Any person aggrieved with the recommendation of the ICC or non-implementation thereof or due to disclosure of contents of sexual harassment complaint the identity and the address of the complainant respondent and the witness Any other information related to the conciliation or inquiry proceedings report and Oregon recommendation of the ICC and action taken by the Company may prefer an appeal in accordance with the provisions of the Act



## Amendments

This Policy may be amended from time to time to ensure compliance with applicable laws and organizational requirements.

## Contact Information

Employees may contact the ICC for assistance or to file a complaint:

- **Email:**cs@racksandrollers.com
- **Phone:**+919632983743
- **Office Address:** No. 10, Survey No.21/6A, 21/7A, 21/7B and 21/8, Singanayakanahalli, Yelahanka, Bengaluru, Karnataka – 560064

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This Policy reaffirms the Company's commitment to maintaining a workplace that is safe, respectful, and inclusive for all.

## Implementation Of This Policy

Storage Technologies and Automation Limited will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the Company. Every year, Storage Technologies and Automation Limited will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

## Monitoring And Evaluation

Storage Technologies and Automation Limited recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the Company will evaluate the effectiveness of this policy and make any changes needed.



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### **Effective Date**

This Policy is effective from the date of approval of the same by the Board of Directors of the Company.

### **Policy Review**

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.

### **Disclosures**

The Company shall disclose the Policy on its website.

### **Dissemination Of The Policy**

The policy shall be hosted on the website of the Company i.e. [www.racksandrollers.com](http://www.racksandrollers.com)

***Effective Date: March 9<sup>th</sup> ,2026***

***Date of Approval by Board of Directors: March 9<sup>th</sup> ,2026***



**ANNEXURE - A**

**FORMAT FOR COMPLAINT TO INTERNAL COMPLAINTS COMMITTEE (ICC)**

*(Under the Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013)*

**Date:**

**To**

Internal Complaints Committee (ICC)  
STORAGE TECHNOLOGIES AND AUTOMATION LIMITED

No 10, Survey No 21/6A, 21/7A, 21/7B and 21/8

Singanayakanahalli, Yelahanka, Bangalore - 560064

**Subject: Complaint of Sexual Harassment**

**1. Details of the Complainant**

- Name:
- Employee ID:
- Designation :
- Department:
- Contact Number:
- Email ID:

**2. Details of the Respondent**

- Name:
- Employee ID:
- Designation :
- Department :
- Contact Number:
- Email ID:

**3. Facts**



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- Please describe how the Complainant is known to the person against whom the complaint is made.
- Please describe the incidents which comprise the acts of sexual harassment
- Please describe the impact of the aforesaid acts on the complainant.
- Please provide the copies of supporting information/data/documents. E.g. exact dates, places of incidents, witnesses if any, text messages, email , any other supporting evidence.
- Please provide the names and addresses of the witnesses.

### **Declaration**

I hereby declare that the information provided above is true and correct to the best of my knowledge. I understand that making a malicious or knowingly false complaint may attract action as per applicable law. Mere inability to substantiate a complaint shall not attract action.

**Signature of the Complainant:**

**Name:**

**Date:**

**Place:**

**Annexure B**

**Format Of Closure Report**

SI. No.	Particulars	Details
1	Complaint No.	
2	Name of the employee who has forwarded the complaint along With the name of the department	
3	Employee location	
4	Complaint against – name of the employee, designation, Location and email id	
5	Complaint in brief	
6	Investigation commencement date	
7	Investigation completion date	
8	Name of the ICC members	
9	Have the Charges been proved	
10	Order description in brief	
11	Date of order implementation by the business unit	

**ANNEXURE - C**

**Format for Annual Report for the status of cases**

<b>Sl. No.</b>	<b>Particulars</b>	<b>Details</b>
a)	Number of complaints of sexual harassment received during the year	
b)	Number of complaints disposed of during the year	
c)	Number of cases pending for more than 90 days	

**ANNEXURE - D**
**INTERNAL COMPLAINT COMMITTEE**

Sl. No.	Name	Designation in ICC	Email ID	Contact Number
1	Ms. Cauveramma B B	Presiding Officer Company Secretary	cs@racksandrollers.com	9632983743
2	Ms. Kavitha K	Member Sales Co-ordinator	salescoordinator@racksandrollers.com	97439 88304
3	Ms. JAYASRI ALAM	Member Senior Design Engineer	jayasri.a@racksandrollers.com	96422 86254
4	Ms. Aysha Samra	Member HR Executive	aysha.s@racksandrollers.com	96111 37030
5	Ms. Japna Choudhary	External Member	csatwork21@gmail.com	9891687952