



SEXUAL HARASSMENT

Prevention



Policy for Prevention of Sexual Harassment

1. Executive Summary:

- 1.1 Nirmitee Robotics India Limited (“Company”) is an equal employment opportunity employer. It is committed to ensure a safe, secure and congenial work environment for all employees, and has zero-tolerance to any incident of sexual harassment in the workplace in any manner whatsoever. Company is committed to fostering an environment free from fear and threat of reprisals, prejudice and bias in any manner whatsoever.
- 1.2 This policy outlines preventive measures, grievance redressal mechanisms, and disciplinary actions to address workplace sexual harassment in accordance with the Prevention of Sexual Harassment (POSH) Act, 2013, and relevant sections of the Indian Penal Code (IPC).

2. Objective of the POSH Policy:

- 2.1 Company believes that all employees should, (a) have the opportunity to work in an environment free from sexual harassment, (b) complement each other as equals, and (c) have the right to be treated with utmost respect and dignity.
- 2.2 The purpose of this POSH policy is to (i) ensure a safe working environment free from sexual harassment, in which persons belonging to all genders work and complement each other as equals, (ii) prevent sexual harassment at the Workplace, (iii) detail a mechanism to raise concerns or issues with respect to any instance of sexual harassment at the Workplace; and (iv) provide an appropriate redressal mechanism for grievances raised on sexual harassment.
- 2.3 Sexual harassment at the Workplace is a grave offence which would be treated as ‘**Misconduct**’ under “**The Company Code & Terms of Employment**” and shall result in disciplinary action as mandated by relevant policies, terms of employment and applicable laws.

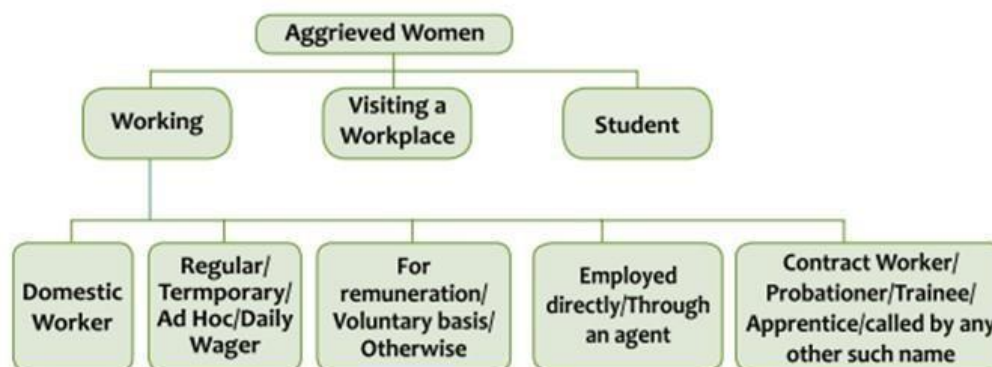
3. Definitions:

- 3.1 **Sexual Harassment** includes any one or more of the following unwelcome acts or behavior whether directly or by implication, namely,
 - a) Physical contact and advances; or
 - b) Demand or request for sexual favors; or
 - c) Making sexually colored remarks; or
 - d) Showing pornography; or
 - e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

If any of the following circumstances occur or are present in relation to or connected with any act or behaviour of sexual harassment, the same may amount to sexual harassment:

- a) Implied or explicit promise of preferential treatment in employment; or
- b) Implied or explicit threat of detrimental treatment; or
- c) Implied or explicit threat about present or future employment status; or
- d) Interference with work or creating an intimidating or offensive or hostile work environment; or
- e) Humiliating treatment likely to affect health or safety.

3.2 **Aggrieved Person** means any person, of any age, whether employed with Company or not, who alleges to have been subjected to any act of sexual harassment by the Respondent within the Workplace.



3.3 **Complainant** means any Employee of Company or an Aggrieved Person who alleges to have been subjected to any act of sexual harassment by the Respondent within the Workplace.

3.4 **Employee** means a person employed at Company for any work on regular, temporary, ad hoc or daily wage basis either directly or through an agent, including a contractor, with or, without the knowledge of the Company, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

3.5 **Workplace:** Each of the following shall individually be considered as “Workplace” for the purpose of this POSH Policy:

- a) Corporate office at Nagpur setup by the Company for the purposes of running the activities of corporate functions (the “**Corporate Establishment**”);
- b) Regional and Branch Office(s) (including any other business location from where employees operate set up by the Company);
- c) Workplace shall also include any place visited by the Employee arising out of or during the course of employment, including transportation provided or hired by Company for undertaking such journey, or on offsite or during business functions, events, activities of the Company or Company guest houses or accommodation and shall also include any hotel or restaurant if used for any purpose connected with or relating to business of the Company.
- d) The Company may, at its discretion, and if the facts and circumstances so warrant, also take cognizance of incidents occurring at places other than Workplace as defined above, like functions and events of personal nature organized by one Employee and attended by others or jointly organized by them, etc.

3.6 **Employer** shall have the same meaning as defined under the Act.

3.7 **Respondent** means a person against whom the aggrieved person has made a complaint of sexual harassment

- 3.8 **Internal Committee** or **IC** means the Internal Committee constituted by the Company as per the guidelines and for the purposes outlined in the Act.
- 3.9 **Presiding Officer** or **PO** means the Presiding Officer of the IC nominated under sub section (2) of Section 4 of the Act.

4. Applicability & Scope:

- 4.1 The POSH Policy is applicable to all Employees including any 'Aggrieved Person'.
- 4.2 The POSH Policy shall come into effect in instances where the incident occurs at the Company Workplace.
- 4.3 The Compliance Team is appointed as the person responsible for the overall administration and implementation of this POSH Policy.

5. Internal Committee:

- 5.1 Company shall constitute an Internal Committee ("IC").
- 5.2 The IC shall comprise a minimum of:
- a) A **Presiding Officer** who shall be a woman employed at a senior level at the Workplace from amongst the Employees or nominated from other offices/ other Workplace(s) of Company, as provided in the Act.
 - b) Not less than **two members** from amongst Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
 - c) **One member** from amongst **non-governmental organizations or associations** committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- 5.3 The updated list of IC Members is furnished in the **Schedule** and also published in the office premises.
- 5.4 The chairperson or any member of the IC cannot hold office for a period exceeding 3 (three) years from the date of their nomination. Changes in the constitution of the IC whenever necessary shall be made as expeditiously as possible. A member can be nominated again.
- 5.5 In case a member of the IC dies or ceases to be engaged, as the case may be, with Company during the period of nomination, then Company will appoint an alternate member to the IC.
- 5.6 Any member of the IC shall be removed from the IC if:
- a) he/she makes known to the public, press or media by means of publishing, communicating or in any other manner, any information in relation to the contents of a complaint, the identity and addresses of the Complainant, Respondent and witnesses, details of the conciliation and inquiry proceedings, recommendations of the IC, or the action taken against the Respondent. Such non-disclosure obligation shall not apply to information regarding the justice secured to any Complainant. However, care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Complainant or witnesses should not be disclosed; or

- b) he/she has been convicted for an offence or an inquiry into an offence under any law for the time being in force or is pending against him/her; or
- c) he/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- d) he/she has so abused his/her position as to render his/her continuance in office prejudicial to the public interest.

6. Duties of Nirmitee Robotics India Limited

- 6.1 It will provide safe working environment at the Workplace.
- 6.2 It will display at any conspicuous place in the Workplace, the penal consequences of Sexual Harassment and constitution of the IC.
- 6.3 It will organize workshops, awareness and orientation programs at regular intervals for sensitizing the Employees and the members of the IC with the provisions of the Act and this POSH Policy.
- 6.4 It will provide necessary facilities, assistance and information to the IC for dealing with the complaints and conducting the inquiries thereof.
- 6.5 It will assist in securing attendance of the Respondent and witnesses before an IC.
- 6.6 It will provide assistance to the Aggrieved Person if he/she chooses to file a complaint in relation to the alleged Sexual Harassment under the Indian Penal Code, 1860 or any other applicable law for the time being in force.
- 6.7 It will cause to initiate action, under the Indian Penal Code, 1860 or any other law for the time being in force, against the perpetrator, or if the Aggrieved Person so desires, where the perpetrator is not an Employee, in the workplace at which the incident of Sexual Harassment took place.
- 6.8 It will treat Sexual Harassment as gross misconduct under the terms of employment and initiate action based on the recommendations of the IC.
- 6.9 It will monitor the timely submission of the reports by the IC.
- 6.10 It includes the number of cases filed and disposed, if any, in the annual report of the Company, as per Section 22 of the Act.

7. Duties of the IC

- 7.1 To conduct inquiry and provide redressal of complaints relating to sexual harassment in a fair and expeditious manner.
- 7.2 To recommend an appropriate psychological, emotional and any other necessary support (counselling, security and other assistance) for the Aggrieved Person, if necessary.
- 7.3 To maintain documents, minutes of meetings and discussions held by the IC with the Aggrieved Person, Respondent, witnesses, etc. during the course of the redressal proceedings.
- 7.4 To ensure strict confidentiality of the contents of the complaint, identity of people involved and of the redressal proceedings.
- 7.5 To ensure protection of the Aggrieved Person against discrimination/ victimization/ retaliation and recommend appropriate action in case of occurrence thereof.
- 7.6 To maintain files with all the information, documents, etc. relating to complaints received and other documents as per the Act.
- 7.7 To meet periodically to review the measures taken by the Company for awareness on prevention of sexual harassment or when the complaint is registered.
- 7.8 To prepare an annual report at the end of the calendar year and submit such a report to the Employer and to the officer concerned under the Act.

8. Registration of Complaint:

- 8.1 Any Employee or Aggrieved Person may file a written complaint of sexual harassment at the workplace to the IC. It shall equally be responsibility of all managers to notify a member of the IC of an incident of sexual harassment that he/she is either witness or is brought to his/her notice by the Employee or Aggrieved Person.
- 8.2 All complaints relating to sexual harassment at Workplace shall be made within a period of 3 (three) months from the date of incident. In case of a series of incidents, the complaint shall be made within a period of 3 (three) months from the date of the last incident.
- 8.3 The IC in its own discretion and for reasons to be recorded in writing, may extend the time limit for the making the complaint by a period not exceeding 3 (three) months, if it is satisfied that the circumstances were such which prevented the Employee or Aggrieved Person from filing a complaint within the said period of 3 (three) months.
- 8.4 The complaint needs to be made in writing by the Aggrieved Person. Where the Aggrieved Person is unable to make a complaint on account of her physical incapacity, the complaint can be filed by:
 - a) her legal heir
 - b) her relative or friend
 - c) her co-worker
 - d) an officer of National Commission for Women or State Women's Commission
 - e) any person who has the knowledge of the incident, with written consent of the Aggrieved Person.

- 8.5 Where the Aggrieved Person is unable to make a complaint on account of her mental incapacity, the complaint can be filed by –
- a) her legal heir; or
 - b) her relative or friend; or
 - c) a special educator; or
 - d) qualified psychiatrist or psychologist; or
 - e) the guardian or authority under whose care she is receiving treatment or care; or
 - f) any person who has the knowledge of the incident jointly with her relative or friend or special educator or qualified psychiatrist or psychologist; or the guardian or authority under whose care she is receiving treatment or care.
- 8.6 If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

Submission of Complaint	Within 3 months of the last incident
Notice to the Respondent	Within 7 days of receiving a copy of the complaint
Completion of Inquiry	Within 90 days
Submission of report by ICC to employer	Within 10 days of completion of the inquiry
Implementation of recommendations	Within 60 days
Appeal	Within 90 days of the recommendations

9. Service of Notice:

- 9.1 Upon receiving the Complaint under this POSH Policy, any Notice issued by IC to the Respondent, Complainant or Aggrieved Person and the witness(s) shall be served by official email available on Company Website, (c) Registered Post Acknowledgement Due and/or Speed Post Acknowledgement Due.
- 9.2 The Proof of Delivery of the aforementioned modes shall be deemed to be sufficient in terms of service of Notice.

10. Resignation of Employment during the course of Inquiry:

- 10.1 During the pendency of the Inquiry proceedings under this POSH Policy, the Respondent, Complainant or Aggrieved Person and the witness(s) to the extent applicable, shall not be permitted to resign without the prior permission of the IC.
- 10.2 In case any Respondent, Complainant or Aggrieved Person and the witness(s) are found to be absconding during the process of Inquiry, the IC shall take appropriate measures and action under the Company Code of Conduct.

11. Inquiry conducted by the IC:

- 11.1 The Complainant or Aggrieved Person shall submit the complaint to IC along with the supporting documents and the names and addresses of the witnesses either in writing or by email addressed to cs@nirmiteerobotics.com The Complaint shall contain all the relevant material and details concerning the alleged sexual harassment including the name(s) of the Respondent(s).
- 11.2 Within a period of 7 (seven) working days from the receipt of the Complaint, IC shall send one copy of the complaint to the Respondent. The Respondent shall file his/her reply to the Complaint along with his/her list of documents, names and addresses of witnesses within a period of 10 (ten) working days from the date of receipt of Complaint.
- 11.3 IC shall take immediate necessary action to cause an inquiry to be made into the Complaint in accordance with the principles of natural justice. Minimum of 3 (three) members of the IC including the Presiding Officer shall be present during the Inquiry. Both the Complainant or Aggrieved Person and the Respondent will be given an equal opportunity to be heard. No Advocate or Legal Practitioner shall be permitted to represent the Complainant or the Respondent. A copy of the findings of IC shall be made available to both the parties enabling them to make representation against the findings before IC.
- 11.4 IC shall in relation to the Complaints filed by an Complainant or Aggrieved Person have the powers of a civil court as provided under the Code of Civil Procedure, 1908 in respect of the following matters:
- a) Summoning and enforcing the attendance of any person and examining him/her on oath.
 - b) Requiring the discovery and production of documents.
 - c) Any other matter.
- 11.5 IC shall have the right to terminate the inquiry proceedings or to give an *ex-parte* decision on the complaint, after giving advance notice of 15 (fifteen) days in writing, if the Complainant or Respondent fails without sufficient cause to present themselves for 3 (three) consecutive hearings convened by the Presiding Officer. IC will make every effort to complete the inquiry within a period of 90 (ninety) days of receipt of complaint by IC.
- 11.6 **Interim Measures:** IC during the pendency of the inquiry, on the written request of the Complainant, recommend to the employer (i) to transfer the Complainant or the Respondent to any other Workplace; (ii) put the Respondent under suspension, or (iii) grant leave to the Complainant up to a period of 3 (three) months; or (iv) restrain the Respondent from reporting on the work performance of the Complainant or writing his/ her confidential report and assign the same to another officer. The leave(s) so granted herein would be in addition to the leave sanctioned under the leave policy of Company.
- 11.7 The Employer shall implement the recommendations of IC received under the preceding clause and send the report of such implementation to the IC.
- 11.8 During the course of Inquiry under this POSH Policy, IC may if it deems fit and necessary under the circumstances, place the Respondent under suspension, during which period the Respondent shall be eligible for 50 (fifty) percent salary.

12. Investigation Report:

- 12.1 On the completion of an inquiry under this Policy, the IC shall provide a report of its findings to the employer, within a period of 10 (ten) days from the date of completion of the inquiry and such report shall be made available to the Complainant and Respondent.
- 12.2 Where the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken in the matter.
- 12.3 Where the IC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Employer such measures as set out in this Policy.
- 12.4 The Employer shall implement the recommendation of the IC within 60 (sixty) days of its receipt.

13. Disciplinary Action:

- 13.1 For the purposes of this Policy, disciplinary action for sexual harassment may result in any one or more of the following;
- 13.2
 - a) Written apology
 - b) Warning
 - c) Reprimand or censure
 - d) Withholding of promotion
 - e) Withholding of pay rise or increments
 - f) Suspension during course of Inquiry
 - g) Termination or Dismissal from service without any notice or compensation
 - h) Undergoing counselling session
 - i) Carrying out community service
- 13.3 In addition to the disciplinary action taken in the preceding clause, an appropriate amount as determined by the IC shall be deducted from the salary or wages or any other applicable benefit of the Respondent and paid to the Employee or Aggrieved Person or to Aggrieved Person's legal heirs as compensation.
- 13.4 If due to absence of the Respondent from his duty or cessation of his employment, the employer is unable to deduct the amount referred to in the preceding clause, the Employer may direct the Respondent to pay such amount to the Employee or Aggrieved Person directly.
- 13.5 If the Respondent fails to pay the amount referred to in the preceding clause to the Aggrieved Person or her legal heirs, the IC may forward the order for recovery of the sum as a 'recoverable arrear' to the District Officer in accordance with the Act.
- 13.6 In determining the compensation required to be paid by the Respondent to the Employee or Aggrieved Person as per preceding clause, the IC shall have regard to:
 - a) The mental trauma, pain, suffering and emotional distress caused to the complainant
 - b) The loss in the career opportunity due to the incident of sexual harassment
 - c) Medical expenses incurred by the victim for physical or psychiatric treatment
 - d) The income and financial status of the Respondent

14. Victimization or Retaliation:

- 14.1 The Employer shall ensure that any Aggrieved Person subjected to sexual harassment or any Employee giving evidence in connection with an instance of sexual harassment is not victimized or discriminated against, while dealing with complaints of sexual harassment and/or in his/her career in the Company.
- 14.2 No Employee will be subjected to retaliatory action relating to his or her report of any alleged sexual harassment.
- 14.3 The Employer shall forbid and take necessary steps to prevent any form of retaliation against witnesses. Where the witness is found to be false and malicious, action shall be taken against him/her as defined in this policy.

15. Confidentiality:

- 15.1 All proceedings, documents and records maintained under this POSH Policy shall be confidential.
- 15.2 Special privacy safeguards will be applied to the investigation and complaints will be handled on a confidential “need to know” basis. A **pseudonym** may be used in place of the Complainant’s name.
- 15.3 All persons involved in the proceedings under this POSH Policy including the parties, witnesses, facilitators, IC members shall be under a duty to respect and maintain confidentiality.
- 15.4 The contents of the complaint made, the identity and addresses of the Employee/ Aggrieved Person, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC, as the case may be, and the action taken by the employer or the District Officer under the provisions of this Policy shall not be published, communicated or made known to the public, press and media in any manner.
- 15.5 However, information may be disseminated regarding the justice secured to any victim of sexual harassment under this Policy without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Employee or Aggrieved Person and witnesses.
- 15.6 Any person who is entrusted with the duty to handle or deal with the complaint, inquiry or recommendations or action under this Policy and contravenes the provisions of confidentiality will be subject to disciplinary action.

16. False or Malicious Complaint and False Evidence:

- 16.1 Where the IC arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or the Complainant has produced any forged or misleading document, it may recommend to the employer of the Complainant, as the case may be, to take action against the Complainant in accordance with the provisions pertaining to ‘Disciplinary Action’ (Clause 13).
- 16.2 A mere inability to substantiate a complaint or provide adequate proof will not attract action against the Complainant.
- 16.3 Before any action is recommended by the IC, the malicious intent on part of the Complainant shall be

established after an inquiry in accordance with the procedure prescribed in the rules framed by the Company under this Policy.

- 16.4 Where the IC arrives at the conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading documents, it may recommend to the employer of the witness, as the case may be, to take disciplinary action against him/her.
- 16.5 In cases of proven false or malicious complaints, Company shall take appropriate steps to restore the reputation of the Respondent in the Company.
- 16.6 Relevant Legal Provision under POSH Act: - A false complaint may face legal repercussions including up to 2 years in prison or a fine of Rs 1 lakh or both under section 14 read with section 10 of the POSH Act.

17. Appeal

- 17.1 Any person, if aggrieved by the findings and recommendation of the IC or non-implementation of IC recommendations, may file an appeal to a court or tribunal in accordance with the Act, within a period of 90 (ninety) days of the recommendations.

18. Legal Framework

Sexual harassment is not only a violation of company policy but also a criminal offense under the Bharatiya Nyaya Sanhita, 2023. Relevant sections of Bharatiya Nyaya Sanhita, 2023 (Earlier Known as IPC) pertaining to sexual harassment include:

1. **Section 73 (Assault or criminal force to woman with intent to outrage her modesty.):** - Whoever assaults or uses criminal force to any woman, intending to outrage or knowing it to be likely that he will thereby outrage her modesty, shall be punished with imprisonment of either description for a term which shall not be less than one year but which may extend to five years, and shall also be liable to fine.
2. **Section 74 (Sexual harassment and punishment for sexual harassment.):** -
 - (i) A man committing any of the following acts—
 - (a) physical contact and advances involving unwelcome and explicit sexual overtures; or
 - (b) a demand or request for sexual favours; or
 - (c) showing pornography against the will of a woman; or
 - (d) making sexually coloured remarks, shall be guilty of the offence of sexual harassment.
 - (ii) Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) of sub-section (1) shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.
 - (iii) Any man who commits the offence specified in clause (iv) of sub-section (1) shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both.
3. **Section 75 (Assault or use of criminal force to woman with intent to disrobe.):** - Whoever assaults or uses criminal force to any woman or abets such act with the intention of disrobing or compelling her to be naked, shall be punished with imprisonment of either description for a term which shall not be less than three years but which may extend to seven years, and shall also be liable to fine.

4. **Section 76 (Voyeurism):-** Whoever watches, or captures the image of a woman engaging in a private act in circumstances where she would usually have the expectation of not being observed either by the perpetrator or by any other person at the behest of the perpetrator or disseminates such image shall be punished on first conviction with imprisonment of either description for a term which shall not be less than one year, but which may extend to three years, and shall also be liable to fine, and be punished on a second or subsequent conviction, with imprisonment of either description for a term which shall not be less than three years, but which may extend to seven years, and shall also be liable to fine.

Explanation 1. —For the purpose of this section, “private act” includes an act of watching carried out in a place which, in the circumstances, would reasonably be expected to provide privacy and where the victim’s genitals, posterior or breasts are exposed or covered only in underwear; or the victim is using a lavatory; or the victim is doing a sexual act that is not of a kind ordinarily done in public.

Explanation 2. —Where the victim consents to the capture of the images or any act, but not to their dissemination to third persons and where such image or act is disseminated, such dissemination shall be considered an offence under this section.

5. **Section 77 (Stalking): -**

(1) Any man who— (i) follows a woman and contacts, or attempts to contact such woman to foster personal interaction repeatedly despite a clear indication of disinterest by such woman; or (ii) monitors the use by a woman of the internet, e-mail or any other form of electronic communication, commits the offence of stalking: Provided that such conduct shall not amount to stalking if the man who pursued it proves that— (i) it was pursued for the purpose of preventing or detecting crime and the man accused of stalking had been entrusted with the responsibility of prevention and detection of crime by the State; or (ii) it was pursued under any law or to comply with any condition or requirement imposed by any person under any law; or (iii) in the particular circumstances such conduct was reasonable and justified.

(2) Whoever commits the offence of stalking shall be punished on first conviction with imprisonment of either description for a term which may extend to three years and shall also be liable to fine; and be punished on a second or subsequent conviction, with imprisonment of either description for a term which may extend to five years, and shall also be liable to fine.

6. **Section 78 (Word, gesture or act intended to insult modesty of woman):-** Whoever, intending to insult the modesty of any woman, utters any words, makes any sound or gesture, or exhibits any object in any form, intending that such word or sound shall be heard, or that such gesture or object shall be seen, by such woman, or intrudes upon the privacy of such woman, shall be punished with simple imprisonment for a term which may extend to three years, and also with fine.

19. Annual Report:

- 19.1** IC shall prepare an Annual Report at the end of the financial year and submit such Report to the Employer as required under the Act.
- 19.2** The Annual Report shall contain the following details:
- a)** Number of complaints of sexual harassment received in the year
 - b)** Number of complaints disposed off during the year
 - c)** Number of cases pending for more than 90 (ninety) days
 - d)** Number of workshops or awareness programmes against sexual harassment carried out
 - e)** Nature of action taken by the Employer

20. Awareness

- 20.1** The company shall conduct training sessions, workshops, awareness programmes for sensitizing the Employees with the provisions of the Act and on sexual harassment. It is mandated that Employees shall attend these awareness programmes and/or training sessions.
- 20.2** Any clarification(s) or explanation in respect of this POSH Policy shall be provided by the HR Head and/or IC Members.
- 20.3** Employees may approach the Legal Department in case they need any clarification on specific provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules made thereunder.

21. Reporting

21.1 It is the duty of HR representative to publish the report to Audit Committee of the Board on the number of cases/complaints received, if any along with the action taken report on or before 15th of every month. The chairperson of Audit Committee then will have to communicate to the committee as well as Board about the cases received, if any & action taken report thereon under POSH, periodically or wherever the meetings are schedule.