

**POSH (Prevention of Sexual Harassment) POLICY
OF
FLAT WHITE CAPITAL PRIVATE LIMITED**

SUMMARY OF POLICY:

Policy Name	POSH POLICY
Date of Approval of First Version	17-12-2025
Periodicity of Review	Annual
Prepared By	Prakhar Khandelwal
Approver	Board of Directors

Date of Review	Date of Next Review	Comments/Remarks/Changes
17-12-2025	On or before Dec-2026	Policy Approved

POSH (Prevention of Sexual Harassment) Policy

1. Objective

To provide a safe, secure, and dignified work environment free from sexual harassment for all employees, visitors, customers, and vendors associated with the FLAT WHITE CAPITAL PRIVATE LIMITED (FWCPL), in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

2. Scope

This policy applies to:

- All employees (permanent, temporary, contractual, interns, trainees)
- Customers visiting branches
- Vendors, consultants, security staff
- All locations: branches, corporate office, field visits, customer locations, digital/virtual meetings

3. Definition of Sexual Harassment

Sexual harassment includes any unwelcome behavior, whether verbal, physical, written, or online, such as:

- Unwanted touching or physical contact
- Demands for sexual favors
- Making sexually colored remarks
- Showing pornography or obscene content
- Any unwelcome physical, verbal, non-verbal, or digital conduct of a sexual nature

Covers both quid pro quo and hostile work environment situations.

4. Internal Committee (IC)

Head of the POSH Committee- Aprajita Sood

- Presiding Officer – Ridika Sultania
- Other Members- Abhinav Dahiya, Yogesh Ahuja
- Minimum 50% members must be women

4.1 Duties of IC

- Receive and register complaints
- Conduct fair inquiry
- Recommend actions to the employer
- Maintain confidentiality
- Submit annual reports

5. Complaint Registration Process

5.1 Who can complain

- Aggrieved woman employee
- Former employee
- Customer/visitor
- Family member/legal heir (if the woman is unable to file)

5.2 How to file

A complaint should be filed:

- In writing (email or written application)
- Within 3 months of the incident (extendable by 3 months for valid reasons)

5.3 Assistance

The IC must assist the complainant in writing the complaint if needed.

6. Inquiry Procedure

1. IC receives a written complaint
2. Sends a copy to the respondent within 7 days
3. Respondent must reply within 10 days
4. IC conducts inquiry including:
 - o Interviews
 - o Evidence collection
 - o Witness statements
5. Inquiry to be completed within 90 days
6. IC submits findings to employer
7. Employer issues action within s

7. Interim Relief (During Inquiry)

The complainant may request:

- Transfer
- Leave up to 3 months
- Change of reporting manager
- Restrictions on respondents contacting complainant

8. Possible Actions

Based on IC findings:

- Written apology
- Warning
- Withholding promotion/increment
- Suspension
- Termination

- Counseling or training
- Police complaint in serious cases

9. False/Malicious Complaints

If the complaint is found malicious (after full inquiry):

- Warning
- Apology
- Disciplinary action

(However, inability to prove a complaint is NOT considered malicious.)

10. Confidentiality

Strict confidentiality must be maintained:

- No details of complaint, names, statements, or documents should be disclosed
- Penalties for breach of confidentiality

11. Employer Responsibilities

- Provide a safe workplace
- Create awareness (posters, emailers, training)
- Organize annual POSH training
- Assist IC in inquiry
- Submit annual POSH report to District Officer

12. Awareness & Training

FWCPL must conduct:

- Annual POSH training for all staff
- IC training on inquiry procedures

- Display POSH policy at all branches and offices

13. Record Keeping

IC must maintain:

- Complaints
- Inquiry communications
- Reports
- Evidence
- Annual report