

**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**

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### **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.

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### **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
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### **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.

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## **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

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## **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.

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## **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:
    - Interviews
    - Evidence collection
    - Witness statements
  5. Inquiry to be completed within 90 days
  6. IC submits findings to employer
  7. Employer issues action within s
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## **7. Interim Relief (During Inquiry)**

The complainant may request:

- Transfer
  - Leave up to 3 months
  - Change of reporting manager
  - Restrictions on respondents contacting complainant
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## **8. Possible Actions**

Based on IC findings:

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

- Counseling or training
  - Police complaint in serious cases
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## **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.)*
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## **10. Confidentiality**

Strict confidentiality must be maintained:

- No details of complaint, names, statements, or documents should be disclosed
  - Penalties for breach of confidentiality
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## **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
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## **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
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### **13. Record Keeping**

IC must maintain:

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