Fos Lighting – Dark Patterns & E-Commerce Compliance Self-Audit

Version 1.0 · Prepared 14 October 2026 · Run once a year, and again after any major change to the website, cart or checkout.
This checklist covers the 13 dark patterns in the **Guidelines for Prevention and Regulation of Dark Patterns, 2023** and the main display requirements of the **Consumer Protection (E-Commerce) Rules, 2020**, as amended in 2026 (amendments in force from 1 January 2027). Rule 4(15) requires an annual self-audit and a compliance certificate shown on the website.

How to use this document

1. Wait until the website changes in "Fos_Customer_Policies_v2.0_Developer_Update" are live.
2. Open the live site in an incognito window, on both mobile and desktop. Place a test order (a low-value item, cancelled afterwards) so you see the full checkout.
3. For every row below, write **Pass**, **Fail** or **N/A**, and a short note. Take a screenshot of anything marked Fail and save it in the same Drive folder.
4. Get every Fail fixed, check it again, and record the fix in Section 4.
5. When every row is Pass or N/A, a director signs the certificate in Section 5 on letterhead. Upload the PDF and link it in the website footer.

1. Audit details

Audit date	
Audited by	Parshuram Pal, Grievance Officer & Customer Experience Manager
Reviewed by (director)	
Website	www.foslighting.in
Devices / browsers checked	Mobile: _____ · Desktop: _____
Test order number	
Next audit due	

2. Dark patterns checklist (2023 Guidelines)

#	Dark pattern	What to check on foslighting.in	Where to look	Pass / Fail / N/A	Notes
1	**False urgency**	No fake "Only 2 left", "X people are viewing", countdown timers or "sale ends tonight" unless they are true and accurate.	Product pages, Clearance, Home banners		
2	**Basket sneaking**	Nothing is added to the cart automatically (insurance, gift wrap, bulbs, donations, priority shipping). The total at payment matches what the customer chose.	Cart, Checkout		
3	**Confirm shaming**	No guilt-tripping wording on decline buttons, e.g. "No thanks, I don't like beautiful homes".	Pop-ups, newsletter, FOS Lumens sign-up, exit pop-ups		
4	**Forced action**	Customers can buy without being forced to create an account, join	Checkout, Sign-up		

#	Dark pattern	What to check on foslighting.in	Where to look	Pass / Fail / N/A	Notes
		the newsletter, give WhatsApp consent, share contacts or download an app.			
5	**Subscription trap**	Any paid membership or subscription is as easy to cancel as to join, with no hidden auto-renewal. (FOS Lumens is free; check it has no paid tier.)	FOS Lumens, Account		
6	**Interface interference**	"No / Cancel / Close" options are as visible as "Yes / Accept". No hidden close buttons on pop-ups. The clearance tick box is not pre-ticked.	Pop-ups, Checkout		
7	**Bait and switch**	The product, price and offer advertised (on ads, Instagram, Google	Ads vs. product pages		

#	Dark pattern	What to check on foslighting.in	Where to look	Pass / Fail / N/A	Notes
		Shopping) are the ones the customer actually gets on the site.			
8	**Drip pricing**	The full price, including shipping and taxes, is shown before payment, and no extra charges appear at the last step. Shipping charges are shown on the product page or in the cart.	Product page, Cart, Checkout		
9	**Disguised advertisement**	Paid or influencer content, sponsored blogs and affiliate links are clearly labelled as ads or sponsored.	Blogs, Concepts, Instagram embeds		
10	**Nagging**	No repeated pop-ups for notifications, newsletter or app install after the customer has closed them once.	All pages		
11	**Trick**	Tick boxes	Checkout,		

#	Dark pattern	What to check on foslighting.in	Where to look	Pass / Fail / N/A	Notes
	question	and consent text are in plain language, with no double negatives (e.g. "Uncheck to not receive…").	Sign-up, Newsletter		
12	**SaaS billing**	No recurring charges without clear consent. (Usually N/A for Fos.)	Payments		
13	**Rogue malpractices**	No malware, phishing-style messages or misleading links in emails, SMS or WhatsApp.	Emails, WhatsApp bot		

3. E-Commerce Rules: display checklist

#	Requirement	What should be on the site	Required from	Pass / Fail	Notes
A	Business details	Fos Designs & Services Pvt. Ltd., 1293, Gali Guliyan, Vakil Pura, Chandni Chowk, Delhi 110006 in the footer; customer care phone	Now		

#	Requirement	What should be on the site	Required from	Pass / Fail	Notes
		and email			
B	Grievance Officer	Parshuram Pal, Grievance Officer & Customer Experience Manager, with email and phone, on the Contact page and linked from the footer; 48-hour acknowledgement, resolution within 1 month	Now		
C	Policies	Refund & Cancellation, Warranty, Shipping and Replacement pages match v2.0, are consistent with each other and are linked from the footer, product pages and checkout	Now		
D	Defective goods	Policies do not refuse a return or refund for defective, not-as-described or	Now		

#	Requirement	What should be on the site	Required from	Pass / Fail	Notes
		late-delivered goods (consumer-rights line present)			
E	Delivery information	A realistic delivery estimate on product pages; the outer limit on the Shipping page	Now		
F	Country of origin	"Made in India" on product pages; imported items (bulbs, holders) show their country	Now (full detail from 1 Jan 2027)		
G	Explicit consent	A clear "agree to policies" line at checkout; no pre-ticked boxes anywhere	Now		
H	Cancellation charges	No cancellation charges within the 24-hour window	Now		
I	Clearance disclosure	A final-sale line on the Clearance page and product pages; the	Now (recommended)		

#	Requirement	What should be on the site	Required from	Pass / Fail	Notes
		tick box at checkout only when the cart has a clearance item			
J	30-day prior price	Every discounted price shows the lowest price of the previous 30 days	1 Jan 2027		
K	Complaint copy	Customers who complain receive a copy of the complaint as recorded	1 Jan 2027		
L	National Consumer Helpline	Fos has joined the NCH convergence process	1 Jan 2027		
M	Self-audit certificate	The signed certificate is linked in the footer	1 Jan 2027		
N	Marketplace listings	GSTIN 07AABCF5595P1ZX, country of origin and policies supplied to Pepperfry, Tata Cliq, IKIRU and others	1 Jan 2027		
O	Invoice	Legal name,	Now		

#	Requirement	What should be on the site	Required from	Pass / Fail	Notes
		address and GSTIN 07AABCF5595P1ZX on every invoice; clearance items marked "Clearance – final sale"			

4. Findings and fixes log

Date found	Row #	Issue	Screenshot file	Fix made	Fixed by	Date re-checked

5. Self-audit certificate (to print on company letterhead)

DARK PATTERNS SELF-AUDIT CERTIFICATE

Fos Designs & Services Pvt. Ltd.
CIN: U74140DL2010PTC204948 · GSTIN: 07AABCF5595P1ZX
1293, Gali Guliyan, Vakil Pura, Chandni Chowk, Delhi 110006

We, Fos Designs & Services Pvt. Ltd., operating the website www.foslighting.in, certify that:

1. We conducted a self-audit of our website, including product pages, cart, checkout, payment, order communications and customer accounts, on [date].
2. The audit was carried out against the Guidelines for Prevention and Regulation of Dark Patterns, 2023, issued by the Central Consumer Protection Authority, and Rule 4 of the Consumer Protection (E-Commerce) Rules, 2020, as amended.
3. Based on this audit, our website does not employ any of the dark patterns specified in the said Guidelines. Any issues identified during the audit have been corrected.
4. We will repeat this self-audit at least once every year and after any significant change to our website.

Date: _____ Place: New Delhi
Signature: _____
Name: _____
Designation: Director, Fos Designs & Services Pvt. Ltd.

Note: Have the company's lawyer review this certificate wording before it is signed and published.

6. Audit history

Year	Audit date	Audited by	Certificate signed by	Certificate published on
2026–27		Parshuram Pal		
2027–28				