



## ANTI-SEXUAL HARASSMENT POLICY

Effective from 3<sup>rd</sup> October 2024

### POLICY

The **Anti-Sexual Harassment Policy** ("Policy") of **Dunes Aviation Academy** provides a mechanism for employees and students to report and address any instances of sexual harassment. The Policy aims to ensure that Dunes Aviation Academy remains a safe and respectful environment for all, free from any form of harassment, where individuals are treated with dignity.

### SCOPE & OBJECTIVE

This Policy applies to all employees and students associated with Dunes Aviation Academy. It aims to promote a learning and working environment that is safe, respectful, and free from sexual harassment. The Policy ensures that any individual can report incidents of sexual harassment without fear of reprisal. It provides a structured process for filing complaints, investigating them, and implementing necessary actions. Additionally, the Policy safeguards the complainant from victimization and ensures access to the Anti-Sexual Harassment Committee (ASHC), which includes members from senior leadership, various departments, students and high-authority figures within the Academy.

The objectives are:

- To maintain a **zero-tolerance policy** toward sexual harassment.
- To provide a **confidential** and accessible platform for raising complaints.
- To ensure **prompt and impartial** investigation of complaints.
- To protect complainants from retaliation or any form of victimization.

### SEXUAL HARASSMENT REPORTING CHANNELS

The Academy will educate all employees and students on the available channels for reporting any form of sexual harassment:

- **Email:** [ashc@dunesaviation.in](mailto:ashc@dunesaviation.in)
- **Contact No.:** +91 98280 72872
- **Contact Person:** HR Head, Accountable Manager, or any designated member of the Anti-Sexual Harassment Committee (ASHC)
- **Letterbox:** A confidential letterbox accessible only by ASHC will be placed in the HR office where individuals can drop written complaints.



### DEFINITION OF SEXUAL HARASSMENT

Sexual harassment includes any unwelcome sexually determined behaviour (whether direct or implied), including but not limited to:

- Inappropriate physical contact or unwelcome advances
- Solicitation of sexual favours
- Sexually suggestive or offensive comments
- Display or distribution of explicit or inappropriate material
- Any other unwelcome behaviour of a physical, verbal, or non-verbal nature with sexual undertones

### INVESTIGATION & REPORTING

1. **Complaint Filing:** Complaints must be submitted in writing or via email, detailing the incident(s).
2. **Initial Assessment:** Upon receiving a complaint, the **Anti-Sexual Harassment Committee (ASHC)** will conduct an initial assessment to determine its validity.
3. **Investigation:** The ASHC will thoroughly investigate the complaint, which may involve collecting evidence, interviewing witnesses, and speaking with the complainant and the accused. Investigations will typically be completed within 20 working days, extendable if deemed necessary by the Committee.
4. **Outcome:** Based on the findings, the ASHC will recommend appropriate actions, which may include disciplinary measures, mediation, or counselling.
5. **Reporting:** The investigation report will be submitted to the management and, governing body of the academy for further necessary action.

### PROTECTION AGAINST RETALIATION

The complainant, as well as any witnesses or individuals assisting in the investigation, will be protected against retaliation. No action such as termination, suspension, demotion, transfer, or any other form of adverse consequence will be taken against those involved in raising or supporting a legitimate complaint.

The **identity of the complainant** and all parties involved shall be kept confidential to the extent possible and as permitted under law. However, if a complaint is found to be false or malicious, appropriate disciplinary action will be taken against the complainant in accordance with the Academy's policies.



## ANTI-SEXUAL HARASSMENT COMMITTEE (ASHC)

List of Members		
Name	Designation	Position in the Committee
Mr. Mukesh Mathur	Accountable Manager	Convener
Capt. Shalini Dharaid	Chief Ground Instructor & Safety Manager	Member
Mr. Yogesh Lambhate	Quality & Safety Manager (DAPL)	Member
Mrs. Dhara Trivedi	Human Resource Executive	Member & Coordinator
Ms. Bhoomi Rasal	Sr. Technical Officer	Member

### PROTECTION

A complaint can be raised without fear of retaliation or any adverse action. The complainant will be provided adequate protection during the investigation. If the investigation determines that the complaint was made maliciously or in bad faith, the complainant will be subject to appropriate disciplinary action as per the Academy's rules and procedures.

### AMENDMENTS

Dunes Aviation Academy reserves the right to amend or modify this Policy, in whole or in part, at any time without prior notice.