Jan Kappi

EU Approved – IV Validator

GMR Airports Limited (GAL)

New validation

RA3 REPORT

18-19.05.2025

jan@x-raytrainer.com

VALIDATION CHECKLIST FOR THIRD COUNTRY EU AVIATION SECURITY VALIDATED REGULATED AGENTS

Third country entities have the option to become part of an ACC3's (*Air cargo or mail carrier operating into the Union from a third country airport*) secure supply chain by seeking designation as a third country EU aviation security validated regulated agent (RA3). An RA3 is a cargo handling entity located in a third country that is validated and approved as such on the basis of an EU aviation security validation.

An RA3 shall ensure that security controls including screening where applicable have been applied to consignments bound for the Union and the consignments have been protected from unauthorised interference from the time that those security controls were applied and until the consignments are loaded onto an aircraft or are otherwise handed over to an ACC3 or other RA3.

The prerequisites for carrying air cargo or air mail into the Union[1] or Iceland, Norway and Switzerland are provided for in Implementing Regulation (EU) 2015/1998.

The checklist is the instrument to be used by the EU aviation security validator for assessing the level of security applied to EU or EEA bound air cargo or air mail[2] by or under the responsibility of the entity seeking designation as a RA3. The checklist is to be used only in the cases specified in point (b) of point 6.8.5.1 of the Annex to Implementing Regulation (EU) 2015/1998. In cases specified in point (a) of point 6.8.5.1 of that Annex, the EU aviation security validator shall use the ACC3 checklist.

A validation report shall be delivered to the designating appropriate authority and to the validated entity within a maximum of one month after the on-site verification. Integral parts of the validation report shall be at least:

— the completed checklist signed by the EU aviation security validator and where applicable commented by the validated entity; and

— the declaration of commitments (Attachment 6-H2 to Implementing Regulation (EU) 2015/1998) signed by the validated entity; and

— an independence declaration (Attachment 11-A to Implementing Regulation (EU) 2015/1998) in respect of the entity validated signed by the EU aviation security validator.

Page numbering, the date of the EU aviation security validation and initialling on each page by the validator and the validated entity shall be the proof of the validation report's integrity.

The RA3 shall be able to use the report in its business relations with any ACC3 and where applicable, with any RA3.

By default the validation report shall be in English.

Part 5 – Screening and Part 6 – High risk cargo or mail (HRCM) shall be assessed against the requirements of Chapters 6.7 and 6.8 of the Annex to Implementing Regulation (EU) 2015/1998. For those parts that cannot be assessed against the requirements of Implementing Regulation (EU) 2015/1998, baseline standards are the Standards and Recommended Practices (SARPs) of Annex 17 to the Convention on International Civil Aviation and the guidance material contained in the ICAO Aviation Security Manual (Doc 8973-Restricted).

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[1]   The Union Member States: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden.

[2]   EU or EEA bound air cargo or air mail or aircraft in this validation checklist is equivalent to the Union and Iceland, Norway and Switzerland bound air cargo or air mail or aircraft.

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Completion notes:

— All applicable and relevant parts of the checklist must be completed, in accordance with the business model and operations of the entity being validated. Where no information is available, this must be explained.

— After each part, the EU aviation security validator shall conclude if and to what extent the objectives of this part are met.

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1.1. Date(s) of validation	
Use exact date format, such as from 01.10.2012 to 02.10.2012	
dd/mm/yyyy	18-19.05.2025
1.2. Date of previous validation where applicable	
dd/mm/yyyy	first validation
Previous RA3 registration number, where available	
AEO certificate or C-TPAT status or other certifications, where available	GMR Airports Limited (GAL) is Regulated Agent (IN/RA/00022-02) certified by Bureau of Civil Aviation Security, Government of India (appropriate authority). UAI was issued 16.05.2025
1.3. Aviation security validator information	
Name	Jan Kappi
Company/Organisation/Authority	X-ray Trainer Ltd
Unique alphanumeric identifier (UAI)	FI/0001/FI/3RKS
E-mail address	jan@x-raytrainer.com
Telephone number – including international codes	+358-45-1118343
1.4. Name of entity	
Name	GMR Airports Limited (GAL)
Company number (for example, commercial register identification number, if applicable)	L52231HR1996PLC113564 (dated 21/10/2024)
Number/Unit/Building	Room No. CE-05, First Floor, Import Building No II
Street	International Cargo Terminal, IGI Airport
Town	New Delhi
Postcode	110 037
State (where relevant)	Delhi
Country	India
P.O. Box address, if applicable	N/A
1.5. Main address of organisation (if different from site to be validated)	
Number/Unit/Building	New Udaan Bhavan
Street	OPP Terminal 3, IGI Airport
Town	New Delhi

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Postcode	110037
State (where relevant)	Delhi
Country	India
P.O. Box address, if applicable	N/A

1.6. Nature of business – More than one business type may be applicable	
a) air cargo only b) air and other modes of transport c) freight forwarder with cargo premises d) freight forwarder without cargo premises e) handling agent f) others	a) Air cargo only e) Handling agent f) Express/courier/postal-mail/pharma/perishable handling

1.7. Does the applicant …?	
a) receive cargo from another 3rd country regulated agent	ÝES
b) receive cargo from 3rd country known consignors	No
c) receive cargo from 3rd country account consignors	No
d) receive exempted cargo	Yes
e) screen cargo	Yes
f) store cargo	Yes
g) other, please specify	Protect cargo

1.8. Approximate number of employees on site	
Number	1145 employees (282 security)

1.9. Name and title of person responsible for third country air cargo or air mail security	
Name	Pavankumar P Bugde
Job title	Chief Security Officer
E-mail address	Pavankumar.prabhakarbugde@gmrgroup.in
Telephone number – including international codes	00 91 8097 209 210 (mobile)

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Organisation and responsibilities of the third country EU aviation security validated regulated agent

Objective: No air cargo or air mail shall be carried to the EU or EEA without being subject to security controls. Cargo and mail delivered by an RA3 to an ACC3 or another RA3 may only be accepted as secure cargo or mail if such security controls are applied by the RA3. Details of such controls are provided in the following Parts of this checklist.

The RA3 shall have procedures in place to ensure that appropriate security controls are applied to all EU or EEA bound air cargo and air mail and that secure cargo or mail is protected until being transferred to an ACC3 or another RA3. Security controls shall consist of one of the following:

(a) physical screening which shall be of a standard sufficient to reasonably ensure that no prohibited articles are concealed in the consignment;

(b) other security controls, part of a supply chain security process, that reasonably ensure that no prohibited articles are concealed in the consignment and which have been applied by another RA3, KC3 or AC3 designated by the RA3.

Reference: point 6.8.3 of the Annex to Implementing Regulation (EU) 2015/1998.

2.1. Has the entity established a security programme?	
YES or NO	Yes
If NO go directly to point 2.5.	N/A
2.2. Entity security programme	
Date – use exact format dd/mm/yyyy	16.05.2025
Version	First edition
Is the security programme submitted and/or approved by the appropriate authority of the state of the entity? If YES please describe the process.	YES Approved by Bureau of Civil Aviation Security (BCAS) 16.05.2025 Application number: RA/150502025/000000247 Written demand for authorization has delivered to BCAS, after review security program has been completed by BCAS stamped approval of program is delivered to the entity. This validation is relying mainly to SOP (Standard Operating Procedure) which are internal documents covering more detailed local procedures, including EU bound cargo procedures. SOP01 issued 17.05.2025 (screening) SOP02 issued 17.05.2025 (company security)
2.3. Does the security programme sufficiently cover the elements mentioned in parts 3 to 9 of the checklist?	

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YES or NO	Yes, security programme is robust and does cover sufficiently all elements covered in parts 3 to 9 of the checklist
If NO, describe why detailing the reasons	N/A

2.4. Is the security programme conclusive, robust and complete?

YES or NO	Yes, security programme is robust and conclusive as it does contain all main aspect of protecting EU-bound air cargo and mail and gives good understanding about level of security.
If NO, specify the reasons	N/A

2.5. Has the entity established a process to ensure that air cargo or air mail is submitted to appropriate security controls before being transferred to an ACC3 or another RA3?

YES or NO	Yes
If YES, describe the process	This validation proves that GMR Airports Limited does have sufficient procedures in place to ensure that appropriate security controls are applied to EU/EEA bound air cargo and air mail and that secure cargo/mail is protected until being transferred to ACC3 or RA3. Cargo is received landside and checked against tampering/damage; any signs of tampering/damage will result to rejection of shipment. Primary screening method for all cargo is x-ray after x-ray other methods will be used accordingly. All cargo and mail are subjected to 100% screening. Security personnel is responsible to choosing best suitable screening method. In case that the cargo is not suitable for x-ray screening due to size or nature of the cargo it will be screened by physical and visual means in addition to ETD. Secured cargo will be stored in SRA under GMR Airports Limited security surveillance.

2.6. Has the entity a management system (such as instruments, instructions) in place to ensure that the required security controls are implemented?

YES or NO	Yes
If YES, describe the management system and explain if it is approved, checked or provided by the appropriate authority or another entity.	Security manual which is approved by BCAS does contain detailed process, also additional standing operation instructions are issued to ensure that required security controls are implemented.

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	- GMR Airports Limited does conduct internal avsec quality control procedures, 1audit for and 1 inspection yearly -Daily "walk-around" by security manager to observe implementation of daily processes. -BCAS does conduct yearly 1 avsec audit and 1 security inspection, this is followed by official report from BCAS.
If NO, explain how the entity ensures that security controls are applied in the required manner.	N/A

2.7. Conclusions and general comments on the reliance, conclusiveness and robustness of the process.

Comments from the entity	N/A
Comments from the EU aviation security validator	GMR Airports Limited does have sufficient procedures in place to ensure that appropriate security controls are applied to EU/EEA bound air cargo and air mail and that secure cargo or mail is protected until being transferred to ACC3 or another RA3. Physical screening is conducted in standard sufficient to ensure in sufficient level that there are no prohibited articles in consignments.

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PART 3

Staff recruitment and training

Objective: To ensure the required security controls are applied, the RA3 shall assign responsible and competent staff to work in the field of securing air cargo or air mail. Staff with access to secured air cargo must possess all the competencies required to perform their duties and shall be appropriately trained.

To fulfil that objective, the RA3 shall have procedures in place to ensure that all staff (such as permanent, temporary, agency staff, drivers) with direct and unescorted access to air cargo or air mail to which security controls are being or have been applied:

(a) have been subject to initial and recurrent pre-employment checks or background checks, which are at least in accordance with the requirements of the local authorities of the RA3 premises validated; and

(b) have completed initial and recurrent security training to be aware of their security responsibilities in accordance with the requirements of the local authorities of the RA3 premises validated.

Note:

— A background check means a check of a person's identity and previous experience, including where legally permissible, any criminal history as part of the assessment of an individual's suitability to implement a security control and/or for unescorted access to a security restricted area (ICAO Annex 17 definition).

— A pre-employment check shall establish the person's identity on the basis of documentary evidence, cover employment, education and any gaps during at least the preceding five years, and require the person to sign a declaration detailing any criminal history in all states of residence during at least the preceding 5 years (Union definition).

Reference: point 6.8.3.1 of the Annex to Implementing Regulation (EU) 2015/1998.

3.1. Is there a procedure ensuring that all staff with direct and unescorted access to secured air cargo/air mail is subject to a pre-employment check that assesses background and competence?	
YES or NO	Yes
If YES, indicate the number of preceding years taken into account for the pre-employment check and state which entity carries it out.	at least 5 preceding years will be taken into account when pre-employment check is done to verify background and competence Government records will be checked by state police. Competence will be checked by GMR Airports Limited. All applicants are required to make also written application and provide documented work history prior any other background checks will start. Only after all verifications Airport Entry Pass (AEP) can be issued. Background check is repeated every 3 years. For successful candidates company badge will be issued in addition to BCAS-AEP prior starting work in cargo terminal.

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	Note: during transition period temporary airport entry passes has been issued to all staff, biometric passes will be issued in one month time.
	Temporary Airport Entry Pass

3.2. Does this procedure include?	
X background check X pre-employment check X check of criminal records X interviews ☐ other (provide details) Explain the elements, indicate which entity carries this element out and where applicable, indicate the preceding timeframe that is taken into account.	**Background check:** -Yes - State police (5 years) **Pre-employment check and interviews:** Yes – GMR Airports Limited (7 years), HR-department, up to 7 preceding years are taken into consideration. Last employers are contacted and all gaps in CV will be investigated. **Check of criminal records:** –Yes - State police (5 years) Note: Local police will confirm residence and character by visiting and questioning neighbours

3.3. Is there a procedure ensuring that the person responsible for the application and supervision of the implementation of security controls at the site is subject to a pre-employment check that assesses background and competence?	
YES or NO	Yes
If YES, indicate the number of preceding years taken into account for the pre-employment check and	All procedures for the responsible person are the same as every other member of staff. See 3.1

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state which entity carries it out.	

3.4. Does this procedure include?

☐ background check ☐ pre-employment check ☐ check of criminal records ☐ interviews ☐ other (provide details) Explain the elements, indicate which entity carries this element out and where applicable, indicate the preceding timeframe that is taken into account.	See details in 3.2.

3.5. Do staff with direct and unescorted access to secured air cargo or air mail receive security training before being given access to secured air cargo or air mail?

YES or NO	Yes
If YES, describe the elements and duration of the training	Length 1 day (AVSEC awareness) Given by BCAS certified and approved AVSEC instructor, employed by GMR Airports Limited Course Contents MODULE 1: INTRODUCTION TO THE COURSE ❖ Explain the course aims, structure and methodology. ❖ Recognize the need for security awareness. ❖ Specify the nature of the threat against the air transport industry in general and specific to the local airport. ❖ Describe briefly the characteristics of offenders, techniques and aims. ❖ Video on AVSEC awareness MODULE 2: DEVELOPMENT OF COUNTER – MEASURES ❖ Present an overview of the industry counter-measures to prevent acts of unlawful interference. ❖ Describe the structure and organization of aviation security (ICAO & BCAS) ❖ Identify the aviation security role of airline, AAI, other agencies working at the airport, public at large including air ticketing agents and passengers. ❖ Describe action to be taken in case of unlawful interference.

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	MODULE 3: THE AVIATION WORKING ENVIRONMENT
	❖ Describe the characteristics and complexity of the aviation environment.
	❖ Define the functions of an airport.
	❖ Identify restricted, non-restricted areas at the airport.
	❖ Describe access control.
	MODULE 4: SECURITY AWARENESS FOR AVIATION EMPLOYEES AND USERS
	❖ Explain the importance of individual contribution to aviation security.
	❖ Describe the need for employee vigilance and acceptance of security measures.
	❖ Describe typical indicators of suspicious behaviour and response actions.
	❖ Recognize the need for security awareness education for the traveling public, air transport users and the media.
	❖ Describe airport entry permit and need for display of PICs.
	MODULE 5: RECOGNITION OF EXPLOSIVE DEVICES AND OFFENSIVE WEAPONS
	❖ Define and classify prohibited items.
	❖ Recognize improvised explosive and incendiary devices, restricted articles, weapons and dangerous objects, including when they are disguised, dismantled or camouflaged - lecture/demonstration
	❖ Identify the places and methods used to hide explosive and incendiary devices and prohibited items/explosives.
	❖ Specify the action to be taken when a "suspect" item is located.
	MODULE 6: BOMB THREAT PROCEDURE
	❖ Describe Bomb threat procedure at airport
	❖ List the action to be taken on receipt of bomb call.
	❖ Describe the procedure for searching an area in response to a bomb threat.
	MODULE 7: CLOSING ACTIVITIES
	❖ Evaluate the training activities of the course.
	Training records in excel format was reviewed during site visit at this was up to date.
3.6. Do staff that accept, screen or protect air cargo or air mail receive specific job-related training?	

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YES or NO	Yes
If YES, describe the elements and durations of training courses.	AVSEC induction length 5 days for all avsec personnel -Introduction to course -Overview of international civil aviation security -Working at the airport -Access control, people and vehicle -Recognition of explosive devices & offensive weapon -Patrolling and guarding -Screening and searching of passengers and baggage -Protection and search of aircraft -Response to security emergencies and contingencies -Carriage of arms and munitions -Escorting people and consingments -New emerging threats to civil aviation -Closing activities Syllabus for Basic AVSEC training program with duration of 13 days + 1 day for examination: -Opening Activities, Course Introduction And Administration Abbreviation/ Acts & Rule/ Roles of Various Agencies -Overview of International civil aviation security -Working at the Airport -Access Control-People and vehicles -Recognition of Explosive Devices & offensive weapons -Patrolling and Guarding -Screening & searching of passenger and baggage -Profiling and behaviour detection -Protection and search of aircraft -Protection and search of catering/stores/catering supplies/inflight supplies -Protecting cargo, mail and courier -Response to security emergency and contingency -Carriage of Arms & Ammunition by Air -Escorting People & Consignment -Emerging threat to civil aviation -Course closing activites Training is given by BCAS approved ASTI. Examination is done by BCAS: Syllabus for Pre-Screener Certification Course 3days Opening Ceremony. Introduction Course objectives, World overview, threat to civil aviation.

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	a. BCAS Circulars and AVSEC Orders, ASR-2023, b. Abbreviations and Terminology c. Access control- People and Vehicle d. Specifications and use of Civil Aviation Security Screening Equipment and screening of passenger and persons other than passenger using HHMD/WTMD and pat down search. Recognition of explosive devices, Dangerous goods Security control on accompanied and unaccompanied baggage. Security control on Cargo Security control on Catering Contingency Planning Bomb Threat and Hijack Situation. Passenger Profiling/Questioning Technique Passenger with special needs and exempt category In addition, Screener Certification Test with duration of 2 days, which is done by BCAS. DGR CBTA based training (personal responsible for screening of cargo and mail) training for initial 2 days After interview and reading training documentation and interviewing staff validator was confident that 1998/2015 11.2.3.2 (a-p) has been complied.

3.7. Do staff referred to in points 3.5 and 3.6 receive recurrent training?

YES or NO	Yes
If YES, specify the elements and the frequency of the recurrent training	3.5 =refresher training once a year 3.6= refresher training every second year

3.8. Conclusion: do the measures concerning staff recruitment and training ensure that all staff with access to secured air cargo or air mail have been properly recruited and trained to a standard sufficient to be aware of their security responsibilities?

YES or NO	Yes
If NO, specify reasons	N/A
Comments from the entity	N/A
Comments from the EU aviation security validator	GMR Airports Limited have demonstrated that they do have procedures in place to ensure that all staff with direct and unescorted access to air cargo / air mail to which security controls are being or have been applied does have all competencies required to perform their duties and they are appropriately trained according to national legislation. All processes concerning training and recruiting are well documented and presented to validator when requested.

PART 4
Acceptance procedures

Objective: The RA3 may receive cargo or mail from another RA3, a KC3, an AC3 or from an unknown consignor. The RA3 shall have appropriate acceptance procedures for cargo and mail in place in order to establish whether a consignment comes from a secure supply chain or not and subsequently which security measures need to be applied to it.

When accepting any consignments, the RA3 shall establish the status of the entity from which it receives the consignments verifying whether or not the unique alphanumeric identifier (UAI) of the entity delivering the consignments is indicated on the accompanying documentation, and confirming that the air carrier or entity delivering the consignment is listed as active in the Union database on supply chain security for the specified airport or site, as appropriate.

If there is no indication of the UAI on the documentation or if the status of the air carrier or entity on the Union database on supply chain security is not active, the RA3 shall treat the consignments as arriving from an unknown source.

Additionally, a RA3 shall maintain a database giving at least the following information for each regulated agent or known consignor that has been subject to EU aviation security validation in accordance with point 6.8.5.1, from which it directly accepts cargo or mail to be delivered to an ACC3 for carriage into the Union:

(a) the company details, including the bona fide business address;

(b) the nature of the business, excluding business sensitive information;

(c)   contact details, including those of the person(s) responsible for security;

(d) the company registration number, if applicable;

(e) where available, the validation report;

(f) the unique alphanumeric identifier attributed in the Union database on supply chain security.

Reference: points 6.8.3.1, 6.8.3.5, and 6.8.5.4 of the Annex to Implementing Regulation (EU) 2015/1998.

Note: An RA3 may only accept cargo from an AC3 as secure cargo, if this RA3 has designated this consignor itself as AC3, in accordance with point (c) of point 6.8.3.1 of the Annex to Implementing Regulation (EU) 2015/1998, and accounts for the cargo delivered by this consignor.

4.1. When accepting a consignment, does the entity establish whether it comes from another RA3, a KC3, an AC3 or an unknown consignor?	
YES or NO	Yes, all consignments received from another RA3 does have completed CSD with RA3 number, validity of RA3 number will be verified from EU database as applicable.

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	If not accompanied with CSD with valid UAI in database, it will be treated as unknown cargo/mail.
If YES, how?	N/A

4.2. Does the entity verify the indication of the UAI on the documentation accompanying consignments received from another ACC3, RA3 or KC3 and confirms the active status of the ACC3, RA3 or KC3 on the Union database on supply chain security?

YES or NO	YES, UAI-number from CSD will be verified against EU database to ensure that UAI is still active

4.3. Does the entity have a procedure to ensure that in case the documentation does not contain the UAI or the entity from which the cargo is received has no active status on the Union database on supply chain security, the consignment is treated as shipment coming from an unknown source?

YES or NO	Yes – In case UAI is not active or there is no UAI in enclosed documentation, consignment concerned will be treated as unknown and is subjected to 100% screening.

4.4. Does the entity designate consignors as AC3?

YES or NO	NO, GMR Airports Limited does not designate account consignors
If YES, describe the procedure and the safeguards required by the entity from the consignor.	N/A

4.5. When accepting a consignment, does the entity establish whether its destination is an EU or EEA airport?

YES or NO – explain	YES All consignments are delivered to loading area located in export side, acceptance staff will verify documentation. After acceptance staff have verified documents, customs will make their inspection. After release from customs all consignments are subjected to 100% screening with same standards and given high level of protection prior handing over to another RA3 or ACC3. If consignment destinated to EU does arrive from RA3 and it can be ensured that shipment has arrived securely with valid UAI and correct accompanying documentation consignment is kept under physical surveillance until moved to SRA Destination review: Perishable and general cargo terminal

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	-booking via DIAL webportal (Delhi International airport)
	-When arriving from RA3 it is transported securely to SRA
	-AWB manual confirmation is also done to all cargo
	EICI cargo terminal
	-All destinations checked manually against AWB
	-EU-bound cargo/mail will be forwarded to screening, except cargo/mail arriving securely from another RA3.

4.6. If YES – does the entity submit all air cargo or air mail to the same security controls when the destination is an EU or EEA airport?

YES or NO	YES
If YES, describe the procedure	All consignments that are not received securely from another RA3 with EU destination are forwarded to loading docks near dual view x-ray machines. All EU bound cargo is screened at minimum with dual view x-rays and additional screening methods will be applied according to need (this decision is made by security staff on duty depending the type of shipment concerned). Secured cargo arriving from RA3 destinated to EU are kept under physical protection until given to airlines.

4.7. When accepting a consignment, does the entity establish whether it is to be regarded as high risk cargo and mail (HRCM) (see definition in Part 6), including for consignments that are delivered by other modes of transport than by air?

YES or NO	Yes
If YES, how? Describe the procedure	All cargo is verified against tampering during acceptance process, also origin of cargo is verified against "red country" list. If there are any signs of significant tampering or originating from "red countries" shipment will be treated as HRCM,

4.8. When accepting a secured consignment, does the validated entity establish whether it has been protected from unauthorised interference or tampering?

YES or NO	YES
If YES, describe by which means (for example, using seals, locks, inspection)	Consignments received from RA3 are subjected to following procedures:

	1. The cargo would arrive in a sealed truck under escort by security staff from the RA3/RA-approved entity.
	2. The security staff of RA3 is to provide the CSD of the cargo along with the details of the seals which are applied by the RA3 security staff at the time of despatch from their warehouse.
	3. Drivers/escort ID-verification process (As per the information shared by the RA3) shall be carried out against government-issued ID cards.
	4. Seal verification process shall be done against the declared information by the cargo forwarding RA3/RA entity.
	5. Cargo visual inspection shall be carried out for any HRCM signs when accepting the cargo at GMR Airports Limited terminal by their security staff.
	6. If any - Cargo during the inspection is rejected i.e due to signs of tampering or any other such issue, then the whole cargo will be dealt with as HRCM and appropriate measures will be taken or the whole consignment/build-up unit will be sent back to the forwarding RA3 entity for further appropriate action.
	7. The reason for such rejection would be logged and shared with the RA3 on an immediate basis.
	8. Post the Security check the accepted cargo shall be under physical surveillance by security staff until these are moved to SRA.
	9. The cargo would come in a build-up unit for onward loading by the aircraft operator and the CSD issued by the forwarding RA3 entity.
	10. Verifying the RA3 number from the online link (EU database) to confirm that it is still available in the database and it is correct.

4.9. Is the person making the delivery required to present an official identification document containing a photo?

YES or NO	Yes, Entry into cargo complex subject to official photo ID
	Cargo and mail tendered by authorised custom's Agent holding photo identity card issued by Airport Operator. The pass is issued after verification of government ID and Police background checks.
	GMR Airports Limited does have the appropriate acceptance procedure for cargo and mail acceptance prior to 100 % screening. Authorised license holder from customs does the clearance and later tenders the shipment to GMR Airports

	Limited with declaration signed by authorised person of the company, signatures are verified by security staff at the time of screening.
	When cargo/mail is arriving from another RA3, this entity will share prior hand drives credentials and drivers' identity will be verified against these prior accepting security cargo/mail.

4.10. Is there a process in place to identify consignments that require screening?

YES or NO	YES
If YES, how?	All consignments arriving from entity that is not originating secured from another RA3 will be subjected to 100% screening, also consignments arriving from another RA3 if there is any doubt of shipments integrity.
	All screened shipments are marked with security sticker by trained security staff employed by GMR Airports Limited. (see 9.4)

4.11. Conclusion: Are the acceptance procedures sufficient to establish that air cargo or air mail to an EU or EEA airport destination comes from a secure supply chain or needs to be subject to screening?

YES or NO	Yes
If NO, specify reasons	N/A
Comments from the entity	N/A
Comments from EU aviation security validator	GMR Airports Limited does have appropriate acceptance procedures for cargo and mail and does subject all non-secured cargo and mail for 100% screening.

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PART 5
Screening

Objective: Where the RA3 accepts cargo and mail which does not come from a secure supply chain, the RA3 needs to subject these consignments to appropriate screening before it may be delivered to an ACC3 as secure cargo. The RA3 shall have procedures in place to ensure that EU or EEA bound air cargo and air mail for transfer, transit or unloading at a Union airport is screened by the means or methods referred to in Union legislation to a standard sufficient to reasonably ensure that it contains no prohibited articles.

Where screening of air cargo or air mail is performed by or on behalf of the appropriate authority in the third country, the RA3 shall declare this fact and specify the way adequate screening is ensured.

Reference: point 6.8.3 of the Annex to Implementing Regulation (EU) 2015/1998.

5.1. Is screening applied on behalf of the entity by another entity?	
YES or NO	No – all screening is done by staff employed by GMR Airports Limited.
If YES, Specify the nature of these entities and provide details: –private screening company; –government regulated company; –government screening facility or body; –other	N/A Photo: Screened on duty, employed by GMR Airports Limited

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Specify the nature of the agreement or contract between the validated entity and the entity that applies the screening on its behalf.	

5.2. Is the entity able to request the appropriate security controls in case the screening is carried out by one of the above entities?

YES or NO	N/A
If NO, provide details	N/A

5.3. By which instruments and instructions (such as oversight, monitoring, and quality control) does the entity ensure that security controls are applied in the required manner by such service providers?

N/A

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5.4. What methods of screening are used for air cargo and mail?

Specify, including details of equipment used for screening air cargo and air mail (such as manufacturer, type, software version, standard, serial number) for all the methods deployed.

X-ray equipment;

Serial No.	Model NO.	SOFTWARE	Installation date	TOP ASSEMBLY PART NO.	Make
88480	HS 180180 -2is	HX-03-16- E	7.7.2011	HS 180180-2is	Smiths
125640	HS 145180-2is	HX-03-16- E	7.11.2017	HS 145180-2is	Smiths
207799	HS 100100V -2is	HX-03-16- E	21.9.2023	HS 100100V-2is	Smiths
128764	HS 145180-2is	HX-03-16- E	20.3.2020	HS 145180-2is	Smiths
127573	HS 145180-2is	HX-03-16- E	13.4.2019	HS 145180-2is	Smiths
192383	HS 145180-2is	HX-03-16- E	08.12.2023	HS 145180-2is	Smiths
128765	HS 145180-2is	HX-03-16- E	21.3.2020	HS 145180-2is	Smiths
192384	HS 145180-2is	HX-03-16- E	08.12.2023	HS 145180-2is	Smiths
125642	HS 145180-2is	HX-03-16- E	31.10.2017	HS 145180-2is	Smiths
207800	HS 100100V -2is	HX-03-16- E	29.9.2023	HS 100100V -2is	Smiths
190123	HS 145180-2is	HX-03-16- E	6.9.2021	HS 145180-2is	Smiths
191133	HS 145180-2is	HX-03-16- E	1.11.2022	HS 145180-2is	Smiths
191132	HS 145180-2is	HX-03-16- E	3.11.2022	HS 145180-2is	Smiths
160125	HS 100100V -2is	HX-03-16- E	22.10.2021	HS 100100V-2is	Smiths
127574	HS 145180-2is	HX-03-16- E	15.4.2019	HS 145180-2is	Smiths
88550	HS 180180 -2is	HX-03-12-D	23.11.2011	HS 180180-2is	Smiths

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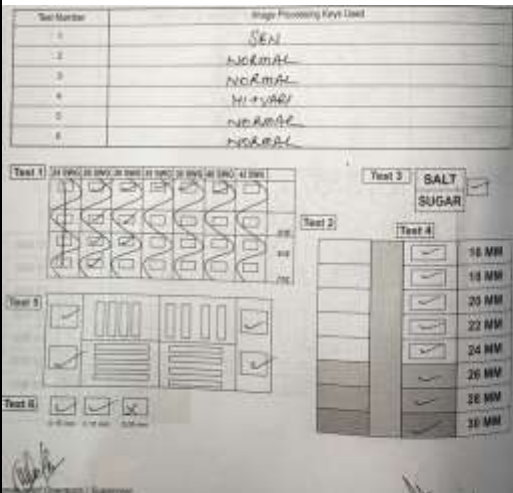
128763	HS 145180-2is	HX-03-16- E	19.3.2020	HS 145180-2is	Smiths
160128	HS 100100V -2is	HX-03-16- E	25.10.2021	HS 100100V-2is	Smiths
190122	HS 145180-2is	HX-03-16- E	28.8.2021	HS 145180-2is	Smiths
192386	HS 145180-2is	HX-03-16- E	16.02.2024	HS 145180-2is	Smiths
141251	HS 100100T-2is	HX-03-12-D	Jan. 2015	HS 100100-2is	Smiths
141079	HS 100100T-2is	HX-03-12-D	Nov.2014	HS100100T-2is	Smiths

ETD Equipment

Serial No.	Model NO.	SOFTWARE	make	Top Assembly Part No.	Installation Date	Det. Algorithm
69566	IS 600	9824012-Y	Smiths	4824000E-301-2	5.9.2019	TSA ACE (24929-9)
93426	IS 600	9824012-5.3.4	Smiths	4824000E-301-3	29.12.2023	TSA ACE (24929-9)
93418	IS 600	9824012-5.3.4	Smiths	4824000E-301-3	4.3.2024	TSA ACE (24929-9)
68150	IS 600	9824012-Y	Smiths	4824000E-301-2	15.11.2018	TSA ACE (24929-9)
69569	IS 600	9824012-Y	Smiths	4824000E-301-2	5.9.2019	TSA ACE (24929-9)
93417	IS 600	9824012-5.3.4	Smiths	4824000E-301-3	4.3.2024	TSA ACE (24929-9)
66517	IS 600	9824012-Y	Smiths	4824000E-301-2	22.6.2017	NE (24778-4)
93424	IS 600	9824012-5.3.4	Smiths	4824000E-301-3	29.12.2023	TSA ACE (24929-9)
93420	IS 600	9824012-5.3.4	Smiths	4824000E-301-3	4.3.2024	TSA ACE (24929-9)
69536	IS 600	9824012-Y	Smiths	4824000E-301-3	5.9.2019	TSA ACE (24929-9)

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6816 1	IS 600	9824012-Y	Smiths	4824000E-301-3	15.11.201 8	TSA ACE (24929-9)
9489 7	IS600	9824012-5.3.4	Smiths	4824000E-301-3	6.11.2024	TSA ACE (24929-9)
25-0121	Itemis er 5X	GUI 10.09.75-CAR	Rapisca n	P0007018-018	July.2023	Narcotic/explosiv e

Visual and/or Physical

Visual inspection/Hand search as on combination and supporting methods in addition to technology.

5.5. Is the equipment or method (such as explosive detection dogs) used included in the most recent EU, European Civil Aviation Conference (ECAC) or the Transportation Security Administration (TSA) of the US compliance list?	
YES or NO	Yes
If YES, provide details	**X-ray** Smiths x-ray's does comply with EU/ECAC STP-requirement. Note: instead of STP, CTP (Combined Test Piece) is used, CTP used by GMR Airports Limited does have all the required components/test to verify compliance with STP requirements. CTP is scanned twice to verify both generators and checklist is completed for both monitors/images (horizontal/vertical). Sample CTP checklist result from logbook **ETD** Ionscan 600 does have TSA detection algorithm expect one unit is Narcotic/Explosive but operated according to manufacturers conops.

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	Explosive trace detectors are kept in same room where x-ray operators are located, room does have air condition to protect equipment from heat. This room is always locked when not controlled by operators, doors/windows closed to protect equipment from dust and heat. Samples are taken from outside of shipment, inside of shipment and from content Image: ETD sample analyzing
If NO, give details specifying the approval of the equipment and date thereof, as well as any indications that it complies with EU equipment standards.	Itemiser 5x (IT5X) does have NE detection algorithm but operated according to manufacturers conops and original consumable was used
5.6. Is the equipment used in accordance with the manufacturers' concept of operations (CONOPS) and is the equipment regularly tested and maintained?	

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YES or NO	Yes
If YES, describe the process	All Smiths x-ray machines and ETD are maintained by local Smiths representative, there are permanent technician presence in GMR Airports Limited warehouse. Itemiser is maintained by Rapiscan representative Technician may be contacted 24/7 for any issues Verification and bakeout for ETD is done by GMR Airports Limited trained staff. Original consumables (sample traps and verification pens) are used for ETD, consumables can be found from TSA list, also latex gloves are used according to manufacturer's conops. CTP check is done during each shift change, typically 3 times a day (every shift change)

5.7. In case EDDs are deployed, are they subjected to initial and recurrent training, approval and quality control process to a standard equivalent to the EU or TSA requirements?

NO	NO
If YES, describe the entire process and the related documentation supporting the assessment	N/A

5.8. In case EDDs are used, is the screening process following a deployment methodology equivalent to EU or TSA standards?

YES or NO	N/A
If YES, describe the entire process and the related documentation supporting the assessment	N/A

5.9. Is the nature of the consignment taken into consideration during screening?

YES or NO	Yes
If YES, describe how it is ensured that the screening method selected is employed to a standard sufficient to reasonably ensure that no prohibited articles are concealed in the consignment.	If x-ray image on cargo or mail turns opaque or there is any other indication that cargo/mail may not be cleared without reasonable doubt, shipper/agent is called to assist opening shipment and additional checks will be conducted (physical, trace…). Items screened are positioned correctly to conveyor according to their size/weight/type. In addition to x-ray, company performs additional random security checks to all cargo and mail according to BCAS requirements. For oversized cargo there is a process to use combination of methods including ETD, visual, physical. If shipment is wet/moist trace detector is not used and alternative methods will be deployed. Note: all shipments are broken to piece level and screened with x-ray one by one, this is BCAS requirement.

5.10. Is there a process for the resolution of the alarm generated by the screening equipment? For some equipment, such as x-ray equipment, the alarm is triggered by the operator himself.

YES or NO	Yes
If YES, describe the process of resolving alarms to reasonably ensure the absence of prohibited articles.	If screener does find any suspicious item´s during screening, he will decide between one of the following: -IED/explosive threat -non-consistence content with AWB -DGR or other prohibited items In case of Explosive alarm details will be immediately informed by screener to GMR Airports Limited shift supervisors and shift duty manager. Management will further inform ASG (Aviation Security Group) and BDDS (Bomb Detection and Disposal Group) For non-explosive alarms screeners will use alternative methods for further clarify safety of shipment. -Supervisor called, screening repeated -Alternative inspection methods will be applied accordingly.
If NO, describe what	N/A

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happens to the consignment	
5.11. Are any consignments exempt from security screening?	
YES or NO	YES
5.12. Are there any exemptions that do not comply with the Union list?	
YES or NO	NO
If YES, detail	N/A
5.13. Is access to the screening area controlled to ensure that only authorised and trained staff are granted access?	
YES or NO	Yes
If YES, describe	Initial entry to terminal non-sterile area is controlled by private security company RAXA, this company is contracted by DIAL to control access to the non-sterile areas. Further docking area (cargo acceptance) is also access controlled by Raxa (under contract with GMR Airports Limited). As a local compliance requirement, the private security company should possess clearance from regulatory body (security clearance and approval of security program from BCAS) -Cargo security hold area, CSHA (only access to persons having airport entry permit issued by BCAS) -Warehouse access control (frisking of all persons accessing warehouse and additional airport/cargo entry pass check), carry-on items are subjected to x-ray screening. -Access to SRA is secured by security staff employed by GMR Airports Limited, all persons entering SRA are subjected to WTMD/HHMD/patdown search (by GMR Airports Limited security) -Biometric reader must be used to access SRA where screening is conducted Biometric reader Personnel screening when entering SRA

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Photo: Xray protection doors opened to allow screening

5.14. Is an established quality control and/or testing regime in place?	
YES or NO	Yes
If YES, describe	CTP test is done three times a day (on every shift change), this is done to both generators. The ETD machine is self-calibrating. Verification is done during shift change and after any failure or error. Dummy security test is done using BCAS approved security test piece, this is done quarterly.

5.15. Conclusion: Is air cargo or air mail screened by one of the means or methods listed in point 6.2.1 of the Annex to Implementing Regulation (EU) 2015/1998 to a standard sufficient to reasonably ensure that it contains no prohibited articles?	
YES or NO	Yes
If NO, specify reason	N/A
Comments from the entity	N/A
Comments from the EU aviation	GMR Airports Limited does have procedures in place to ensure that EU/EEA bound air cargo and air mail for transfer, transit or unloading at a Union airport is screened by the means or methods to a standard sufficient to reasonably ensure that it contains no prohibited articles

security validator	

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High Risk Cargo or Mail

Objective: Consignments which originate from or transfer in locations identified as high risk by the Union or which appear to have been significantly tampered with are to be considered as high risk cargo and mail (HRCM). Such consignments have to be screened in line with specific instructions. The RA3 shall have procedures in place to ensure that EU or EEA bound HRCM is identified and subject to appropriate controls as defined in the Union legislation.

The ACC3 to which the RA3 delivers air cargo or mail for transportation shall be authorised to inform the RA3 about the latest state of relevant information on high risk origins.

The RA3 shall apply the same measures, irrespective of whether it receives high risk cargo and mail from an air carrier or through other modes of transportation.

Reference: point 6.7 of the Annex to Implementing Regulation (EU) 2015/1998.

Note: HRCM cleared for carriage into the EU/EEA shall be issued the security status 'SHR', meaning secure for passenger, all-cargo and all-mail aircraft in accordance with high risk requirements.

6.1. Do staff responsible for performing security controls know which air cargo and mail is to be treated as high risk cargo and mail (HRCM)?	
YES or NO	Yes
If YES, describe	Consignments that appear to have been significantly tampered with or which are otherwise suspect are treated as high-risk cargo or mail (HRCM). for example, large holes, not normal way of delivery, wrong security tape/seal/wrapping used. List of "red countries" is available to security staff in screening locations next to x-ray machines.

6.2. Does the entity have procedures in place for the identification of HRCM?	
YES or NO	Yes
If YES, describe	All cargo and mail arriving that seems to be tampered is screened using ETD and XRY; after screening security or bar code stickers are attached to every piece to give identification that item has been screened according to regulations and transferred to secure area. When receiving cargo or mail all consignments visual inspection against irregularities will take place and if there any irregularities are found in Consignments or it's way of delivery consignments will be treated as HRCM. All cargo coming from "red countries" are treated high risk and subjected to HRCM screening, all cargo is reviewed against list of "red countries". NOTE: according to GMR Airports Limited staff, I was told that they currently receive HRCM only from Bangladesh.

6.3. Is HRCM subject to HRCM screening procedures according to Union legislation?	
YES or NO	Yes, process for screening EU/EEA bound air cargo/mail is in compliance with Union legislation.

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	All HRCM cargo is always screened by XRY and additionally screened by ETD.
If NO, indicate procedures applied	N/A

6.4. After screening, does the entity issue a security status declaration for SHR in the documentation accompanying the consignment?

YES or NO	Yes
If YES, describe how security status is issued and in which document	A e-CSD is completed after all applicable methods of screening have been completed showing SHR, methods of screening used and the screener's identity, date and time.

6.5. Conclusion: Is the process put in place by the entity relevant and sufficient to ensure that all HRCM has been properly treated before loading?

YES or NO	Yes
If NO, specify reason	N/A
Comments from the entity	N/A
Comments from EU aviation security validator	GMR Airports Limited does have procedures in place to ensure that EU/EEA bound HRCM is identified and subject to appropriate control as defined in the Union legislation.

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PART 7
Protection of secured air cargo and mail

Objective: The RA3 shall have procedures in place to ensure EU or EEA bound air cargo and/or air mail is protected from unauthorised interference and/or any tampering from the point where security screening or other security controls are applied or from the point of acceptance after screening or security controls have been applied, until loading or transferring to an ACC3 or another RA3. If previously secured air cargo and mail is not protected afterwards, it may not be loaded or transferred to an ACC3 or another RA3 as secure cargo or mail.

Protection can be provided by different means such as physical (for example barriers, locked rooms), human (for example patrols, trained staff) and technological (for example CCTV, intrusion alarm).

EU or EEA bound secured air cargo or mail should be separated from air cargo or mail which is not secured.

Reference: point 6.8.3.1 of the Annex to Implementing Regulation (EU) 2015/1998.

7.1. Is protection of secured air cargo and air mail applied on behalf of the validated entity by another entity?	
YES or NO	YES/no
If YES, Specify the nature of these entities and provide details: — private screening company; —government regulated company; —government screening facility or body; —other	Protection of secured cargo is done by GMR Airports Limited security staff supported by Raxa at the city side (initial entrance point). Cargo Security Hold Area is protected by GMR Airports Limited security staff.

7.2. Are security controls and protection in place to prevent tampering during the screening process?	
YES or NO	Yes
If YES, describe Specify what kind(s) of protection(s) are put in place: —physical (for example fence, barrier, building of	Perimeter security alarm (on airside) by federal authority Premises are made of modern solid materials such as concrete brick, and steel. GMR Airports Limited does have their own control room equipped with recording CCTV and dispatch. There are totally 580 cameras viewing all exterior and interior areas, including the screening rooms, secure warehouse areas and sterile area to the rear of the warehouses. These are monitored by GMR Airports Limited. security staff 24/7.

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solid construction),	Images stored at least 30days according to BCAS requirements.
—human (for example patrols etc.),	
—technological (for example CCTV, alarm system).	
Explain how they are organised.	Photo: CCTV room

7.3. Is the secure air cargo/air mail only accessible to authorised persons?

YES or NO	Yes
If YES, describe Specify how all access points (including doors and windows) to identifiable and secured air cargo or air mail are controlled.	All access points are manned by security personnel: Cargo Yard: -Cargo terminal entry/exit gates (to general cargo yard with access also to DCSC) are controlled by Raxa (under contract of DIAL) with support of CISF/ASG. GMR Airports Limited cargo terminal entry gates (truck dock gates): -Controlled by Raxa contracted by GMR Airports Limited security GMR Airports Limited cargo security hold area/sterile area gates: -Controlled by BCAS certified GMR Airports Limited security staff Apron side gates (access towards airside of IGI airport) -Controlled by CISF. All persons entering area will be subjected to WTMD/HHMD/Physical search and inspection of BCAS-AEP or DIAL-AEP. All doors and windows with access to secured cargo/mail which are not manned are physically locked and secured.

7.4. Are there procedures in place to ensure EU or EEA bound air cargo or air mail to which security controls have been applied are protected from unauthorised interference from the time it has been secured until its loading or is transferred to an ACC3 or another RA3?

YES or NO	Yes
If YES, describe how it is protected (for example by	All cargo is kept after screening in SRA which is protected (see7.2) with combination of physical, human and technological means.

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X RAY TRAINER

physical, human, technological means) Specify also if the building is of solid construction and what kinds of materials are used, if available.	CCTV camera is controlled 24/7 and footage is stored at least for one month. Building used to store secured EU/EEA bound shipments are made of modern solid materials including bricks, steel and concrete. note: it is not allowed to take personal items to SRA (except mobile phones), persons exiting and entering SRA are subjected to search.
If NO, specify reasons	N/A

7.5. Conclusion: Is the protection of consignments sufficiently robust to prevent unlawful interference?	
YES or NO	Yes
If NO, specify reason	N/A
Comments from the entity	N/A
Comments from EU aviation security validator	GMR Airports Limited does have procedures in place to ensure EU/EEU bound Air cargo and air mail is protected from unauthorised interference and / or any tampering from the point of security screening or other security controls are applied or from the point of acceptance after screening or security controls have been applied, until loading or transferring to an RA3 or ACC3.

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PART 8

Documentation

Objective: The RA3 shall ensure that the documentation accompanying a consignment to which the RA3 has applied security controls (such as screening, protection), contains at least:

(a) the unique alphanumeric identifier received from the designating appropriate authority; and

(b) the unique identifier of the consignment, such as the number of the (house or master) air waybill, when applicable; and

(c) the content of the consignment; and

(d) the security status, indicated as follows:

—'SPX', which means secure for passenger, all-cargo and all-mail aircraft, or

—'SCO', which means secure for all-cargo and all-mail aircraft only, or

— 'SHR', which means secure for passenger, all-cargo and all-mail aircraft in accordance with high risk requirements.

If the security status is issued by the RA3, the entity shall additionally indicate the reasons for issuing it, such as the means or method of screening used or the grounds for exempting the consignment from screening, using the standards adopted in the Consignment Security Declaration scheme.

The documentation accompanying the consignment may either be in the form of an air waybill, equivalent postal documentation or in a separate declaration, and either in an electronic format or in writing.

Reference: point (d) of point 6.3.2.6, points 6.8.3.4, 6.8.3.5 and 6.8.3.6 of the Annex to Implementing Regulation (EU) 2015/1998

8.1. Does the entity ensure that appropriate accompanying documentation is established, and include the information required in point (d) of point 6.3.2.6, points 6.8.3.4, 6.8.3.5 and 6.8.3.6 of the Annex to Implementing Regulation (EU) 2015/1998?	
YES or NO	Yes, CSD is used (Entity is using e-CSD, which fully digital, but can be printed to paper format if required by airline or another entity). Note: there are no screeners signature as all is digital, but screeners details can be confirmed from database used to generate e-CSD.
If NO, explain	N/A
8.2. In particular, does the entity specify the status of the cargo and how this was achieved?	
YES or NO	Yes – A CSD is completed and does show security status, screening methods and screeners identification.

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GMR AIRPORTS LIMITED
Consignment Security Declaration

Regulated Entity Category (KC, RA or AO) and Identifier (of the regulated party issuing the security status)	Unique Consignment Identifier (if AWB format is nnn-nnnnnnnn)
RA-IN/RA/00022-02	07X-70XXXX64

Contents of Consignment

☑ Consolidation

Origin	Destination	Transfer/Transit points
DEL	ORF	

Security Status	Reasons for issuing the Security Status		
	Received from (codes)	Screening Method (codes)	Grounds for Exemption (codes)
SPX		ETD, PHS, XRY	

Other Screening Method(s) (if applicable)

Security Status Issued by	Security Status Issued on	
40010691 - VINOD SINGH BISHT	Date 17-May-2025	Time 05:35

Regulated Entity Category (KC, RA or AO) and Identifier (of any regulated party who has accepted the security status given to a consignment by another regulated party)

Additional Security Information

THIS DOCUMENT IS SYSTEM GENERATED & DOES NOT REQUIRE STAMP/SIGN.

If NO, explain	N/A

8.3. Conclusion: Is the documentation process sufficient to ensure that cargo or mail is provided with proper accompanying documentation which specifies the correct security status and all required information?

YES or NO	Yes
If NO, specify reason	N/A
Comments from the entity	N/A
Comments from EU aviation security validator	Screening methods used and the correct security status in addition to other required information is clearly indicated in accompanying documentation, also GMR Airports Limited UAI is indicated clearly. Documentation used is CSD (Cargo Security Declaration), e-CSD.

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PART 9

Transportation

Objective: Air cargo and air mail must be protected from unauthorised interference or tampering from the time it has been secured until its loading or until it is transferred to an ACC3 or another RA3. This includes protection during transportation to the aircraft, to the ACC3 or to another RA3. If previously secured air cargo and mail is not protected during transportation, it may not be loaded or transferred to an ACC3 or another RA3 as secure cargo.

During transportation to an aircraft, an ACC3 or another RA3, the RA3 is responsible for the protection of the secure consignments. This includes cases where the transportation is undertaken by another entity, such as a freight forwarder, on its behalf. This does not include cases whereby the consignments are transported under the responsibility of an ACC3 or another RA3.

Reference: point 6.8.3 of the Annex to Implementing Regulation (EU) 2015/1998.

9.1. How is the air cargo or air mail conveyed to the ACC3 or to another RA3?	
(a) Validated entity's own transport?	
YES or NO	NO
(b) Other RA3's or ACC3's transport?	
YES or NO	Yes, cargo is handed over to another RA3 or to ACC3 for transportation.
(c) Contractor used by the validated entity?	
YES or NO	No
9.2. Is the air cargo or air mail tamper evidently packed?	
YES or NO	Yes
If YES, how	The cargo will remain in the restricted area until ready for transfer to aircraft, these are kept under guard by staff until it is time for loading. All pallets are covered by plastics and netted, any intrusion can be noticed by trained GMR Airports Limited staff. CISF will also verify integrity of consignments before granting access to apron.

CISF verifying cargo exiting GMR Airports Limited

9.3. Is the vehicle sealed or locked before transportation?	
YES or NO	N/A
If YES, how	N/A
9.4. Where numbered seals are used, is access to the seals controlled and are the numbers recorded?	
YES or NO	YES
If YES, specify how	Each shipment is marked either with digital security sticker with bar code or traditional security sticker Sample stickers to be used in operation, order placed and should arrive in June 2025
9.5. If applicable, does the respective haulier sign the haulier declaration?	
YES or NO	N/A
9.6. Has the person transporting the cargo been subject to specific security controls and awareness training before being authorised to transport secured air cargo or air mail, or both?	
YES or NO	N/A

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If YES, please describe what kind of security controls (such as pre-employment check, background check) and what kind of training (such as security awareness training).	GMR Airports Limited does not offer any cargo transportation from warehouse to aircraft. GMR Airports Limited responsibility will stop when cargo is granted access to apron by CISF. Airlines do have their own contracts and arrangements with GH's which are also RA3's or does come under ACC3's security programme.

9.7. Conclusion: Are the measures sufficient to protect air cargo or air mail from unauthorised interference during transportation?

YES or NO	Yes
If NO, specify reasons	N/A
Comments from the entity	N/A
Comments from EU aviation security validator	Cargo is handed over to another RA3 or ACC3 on exit gate. all transportation is under responsibility of another RA3 or ACC3. The procedures will reasonably ensure that cargo could not be tampered with or during transportation.

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PART 10

Compliance

Objective: After assessing Parts 1 to 9 of this checklist, the EU aviation security validator has to conclude if its on-site verification confirms the implementation of the security controls in compliance with the objectives listed in this checklist for the EU or EEA bound air cargo or air mail.

Two different scenarios are possible. The EU aviation security validator concludes that the entity:

1. has succeeded in complying with the objectives referred to in this checklist. A validation report shall be delivered to the designating appropriate authority and to the validated entity within a maximum of one month after the on-site verification;

2. has failed in complying with the objectives referred to in this checklist. In that case, the entity is not authorised to deliver secured air cargo or mail for EU or EEA destination to an ACC3 or to another RA3. It shall receive a copy of the completed checklist stating the deficiencies.

10.1. General conclusion: Indicate the case closest to the situation validated	
1 or 2	1
Comments from EU aviation security validator	Full on-site validation has been conducted and various interviews has been done with GMR Airports Limited staff and employees.
	According with all evidence gathered during site visit validator may confirm that cargo premises located in Delhi with staff and SOP's/ are in compliance with requirements laid down in the check list.
	All procedures staff displayed good understanding of security rules and procedures when questioned and observed during operations.
Comments from the entity	N/A

Name of the validator: Jan Kappi
Date: 19.05.2025
Signature:

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ANNEX

List of persons and entities visited and interviewed

Providing the name of the entity, the name and the position of the contact person and the date of the visit or interview.

NAME OF ENTITY	NAME OF CONTACTED PERSON	POSITION OF CONTACTED PERSON	DATE OF VISIT OR INTERVIEW
GAL	Mr. PavanKumar Bugde	Manager - S & S	18th to 19th May 2025
GAL	Mr. Rakesh Singh	Head of Security	18th to 19th May 2025
GAL	Mr. Jeru Venkat Reddy	Assistant Manager Security	18th to 19th May 2025
GAL	Mr. Kailash Khanna	Sr. Manager Security	18th to 19th May 2025
GAL	Mr. Sanjay Dasila	Sr. Manager Security	18th to 19th May 2025
GAL	Mr. Sandeep Sehrawat	Sr. Manager Security	18th to 19th May 2025
GAL	Mr. Pawan Kumar	Sr. Security Officer - Screener	18th to 19th May 2025
GAL	Mr. Jatin Verma	Sr. Security Officer - Screener	18th to 19th May 2025
DIAL	Mr. Ravinder Singh	AGM Security	18th to 19th May 2025
GAL	Mr. Shivam	Asst Manager Technical	18th to 19th May 2025

Pavankumar P Bugde   19.05.2025   Jan Kappi

ATTACHMENT 6-H2

DECLARATION OF COMMITMENTS — THIRD COUNTRY EU AVIATION SECURITY VALIDATED REGULATED AGENT (RA3)

On behalf of GMR Airports Limited I take note of the following:

This report establishes the level of security applied to EU or EEA bound air cargo operations in respect of the security standards listed in the checklist or referred to therein.

GMR Airports Limited can only be designated 'third country EU aviation security validated regulated agent' (RA3) once an EU aviation security validation report has been submitted to and accepted by the appropriate authority of a Member State of the European Union or Iceland, Norway or Switzerland for that purpose, and the details of the RA3 have been entered in the Union database on supply chain security.

If a non-compliance in the security measures the report refers to is identified by the appropriate authority of a Union Member State or by the European Commission, this could lead to the withdrawal GMR Airports Limited designation as a RA3 already obtained for this premises which will prevent GMR Airports Limited from delivering secured air cargo or mail for EU or EEA destination to an ACC3 or another RA3.

The report is valid for three years and shall therefore expire on 19/05/2028 at the latest.

On behalf of GMR Airports Limited I declare that:

(1) GMR Airports Limited will accept appropriate follow-up action for the purpose of monitoring the standards confirmed by the report.
(2) I will provide the designating appropriate authority with the relevant details promptly but at least within 15 days if:
   (a) any changes to GMR Airports Limited security programme occur;
   (b) the overall responsibility for security is assigned to anyone other than the person named in point 1.9 of Attachment 6-C2 to Implementing Regulation (EU) 2015/1998;
   (c) there are any other changes to premises or procedures likely to significantly impact on security;
   (d) the company ceases trading, no longer deals with air cargo or mail bound to the European Union, or can no longer meet the requirements of the relevant Union legislation that have been validated in this report.
(3) GMR Airports Limited will maintain the security level confirmed in this report as compliant with the objective set out in the checklist and, where appropriate, implement and apply any additional security measures required to be designated RA3 where security standards were identified as insufficient, until the subsequent validation of GMR AIRPORTS LIMITED Ltd activities.
(4) GMR Airports Limited will inform the ACC3s and RA3s to which it delivers secured air cargo and/or air mail if GMR Airports Limited ceases trading, no longer deals with air cargo/air mail or can no longer meet the requirements validated in this report.

On behalf of GMR Airports Limited I accept full responsibility for this declaration.

Name: Pavankumar P Bugde
Position in company: Chief Security Officer
Date: 19.05.2025
Signature:

Pavankumar P Bugde   19.05.2025   Jan Kappi

ATTACHMENT 11-A

INDEPENDENCE DECLARATION — EU AVIATION SECURITY VALIDATOR

(a)   I confirm that I have established the level of compliance of the validated entity in an impartial and objective way.

(b)   I confirm that I am not, and have not in the preceding two years, been employed by the validated entity.

(c)   I confirm that I have no economic or other direct or indirect interest in the outcome of the validation activity, the validated entity or its affiliates.

(d)   I confirm that I have, and have had in the preceding 12 months no business relations such as training and consultancy beyond the validation process with the validated entity in areas related to aviation security.

(e)   I confirm that the EU aviation security validation report is based on a thorough fact finding evaluation of relevant security documentation, consisting of:

-    the validated entities' security programme or equivalent, and

-    an on- site verification of the implementation thereof.

(f)   I confirm that the EU aviation security validation report is based on an assessment of all security relevant areas on which the validator is required to give an opinion based on the relevant EU checklist.

(g)   I confirm that I have applied a methodology that allows for separate EU aviation security validation reports in respect of each entity validated and ensures objectivity and impartiality of the fact finding and evaluation, where several entities are being validated in a joint action.

(h)   I confirm that I accepted no financial or other benefits, other than a reasonable fee for the validation and a compensation of travel and accommodation costs.

I accept full responsibility for the EU aviation security validation report.

Name of the validated entity: GMR Airports Limited
Name of the EU aviation security validator: Jan Kappi
Date: 19.05.2025
Signature:

Pavankumar P Bugde   19.05.2025   Jan Kappi