



VIGIL MECHANISM POLICY (1st Amendment w.e.f. 01.10.2022)

This document lays down the vigil mechanism at **Celebi Airport Services India Private Limited** (Formerly known as **Celebi Ground Handling Delhi Private Limited**) (hereinafter referred to as the 'Company') and shall be under the authority of the Board of Directors of the Company.

The Company intends to establish Vigil Mechanism within the Organisation to enable the Employees and Directors to report their genuine concerns or grievances and titles as the "Vigil Mechanism Policy" which is based as per the provisions of section 177 (9) of the Companies Act, 2013 read with Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014, as amended and modified from time to time.

The Company shall oversee the vigil mechanism through the Director being nominated by the Board of Directors ("Vigilance Officer").

1. This Policy shall be effective from 1st October, 2017.
2. Any Director or employee of the Company who observes any unethical or improper practice (not necessarily a violation of Law) or actual/suspected dishonest or illegal activities or fraud or corruption taking place in the organization, he/she shall be free to approach the Vigilance Officer. Please note that complaints concerning personal grievances, such as professional development issues or Employee compensation, are not Reportable Matters for purposes of this Policy.
3. The Director or employee need not inform his/her immediate superior while approaching the Vigilance Officer.
4. The Director or employee should make his/her observation in the form of a letter duly signed by him/her addressed to the Vigilance Officer or sent by email to the Vigilance Officer at below stated address;

Vigilance Officer: Mr. Murali Ramachandran

Address: Celebi Airport Services India Pvt. Ltd.

Room No. CE-01, Import Building 2, International Cargo Terminal, IGI Airport,
New Delhi - 110 037

Phone: +011-2560 1310

E-mail: Ethics@Celebiaviation.com

or at such other address or email address as may be notified by the Board from time to time.

5. The observations of a Director or an employee should be in brief, concise and to the point. The Vigilance Officer may not entertain any anonymous letters. There may be situations where the notifications may be related to highly confidential and sensitive matters and therefore the Director/ employee prefers to make a report with anonymity. In such a case, all possibilities will be used to investigate the suspicions of the notifier.



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6. Observations should be factual and not speculative or in the nature of a conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.
7. Any Director or employee communicating his/her observations to the Vigilance Officer may be summoned by the Vigilance Officer to be personally present to provide clarification / further information if and when required.
8. The Vigilance Officer shall consider all the Letters of observation received from Director or employee at the earliest. The Vigilance Officer himself or with the help of Investigator shall carry out detailed investigation if the reported observation is found to be correct.
Investigator means those persons authorised, appointed, consulted or approached by the Vigilance Officer.
9. If an investigation leads to a conclusion that an improper or unethical act has been committed, the Vigilance Officer shall recommend to the Board of Directors of the Company to take such disciplinary or corrective action as it may deem fit.
10. If the Vigilance Officer have a conflict of interest in a given case, he should recuse himself and the other members of Board would deal with the matter on hand.
11. After considering the observations of the Director or employee, the Vigilance Officer shall communicate the decision to the said Director or employee.
12. The Company shall not deny any Director or employee access to the Vigilance Officer and shall provide protection to such Director or employee from unfair termination and other unfair or prejudicial employment practices. If the notifying Director/employee believes that he/she suffers from victimization and/or unjust treatment because of his/her notification or his/her help to an investigation, he / she should immediately intimate the same to the Vigilance Officer. The Vigilance Officer shall take necessary action as he deems fit for the protection of the concerned notifying Director/employee.
13. Everyone involved in the process shall maintain complete confidentiality of the matter and discuss only to the extent or with the persons required for the purpose of completing the investigation. However, the lessons learnt during the investigation can be shared with others, without naming the persons involved, to bring more awareness and for the overall benefit of the Company.
14. The Board of Directors of the Company reserves its right to amend this Policy in whole or in part, at any time without assigning any reason whatsoever.

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CELEBI AIRPORT SERVICES INDIA PRIVATE LIMITED

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