

ESG Due Diligence Report for Proposed Working Women’s Hostel at Trichy

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India: Inclusive, Resilient, and Sustainable Housing for Urban Poor Sector Project in Tamil Nadu

Construction of Working Women’s Hostels- Phase I (Tambaram, Trichy and Guduvancherry)

Prepared by Tamil Nadu Infrastructure Fund Management Corporation Ltd. (TNIFMC), Government of Tamil Nadu for the Asian Development Bank.

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List of Abbreviations

ADB	Asian Development Bank
CMDA	Chennai Metropolitan Development Authority
CRZ	Coastal regulation zone
CTE	Consent to Establish
CTO	Consent to Operate
Dept.	Department
DSW	Department of Social Welfare
DFR	Detailed Feasibility Report
EIA	Environmental Impact Assessment
EMP	Environment Management Plan
ESG	Environment, Social and Governance
ESGMS	Environment, Social and Governance Management System
GoTN	Government of Tamil Nadu
GRM	Grievance Redressal Mechanism
IFC	International Finance Corporation
MoEFCC	Ministry of Environment Forest and Climate Change
NOC	No Objection Certificate
OSD	Officer on Special Duty
PMU	Project Management Unit
SPV	Special Purpose Vehicle
TN	Tamil Nadu
TNIFMC	Tamil Nadu Infrastructure Fund Management Corporation Limited
TNSF	Tamil Nadu Shelter Fund
TNWWHCL	Tamil Nadu Working Women's Hostels Corporation Limited

Chapter 1

Project Overview

1. Considering the huge demand for safe, professionally run, and affordable rental accommodation with basic amenities for working women, the Tamil Nadu Shelter Fund (TNSF) along with the Department of Social Welfare & Women Empowerment (DSW&WE) of the Government of Tamil Nadu (GoTN) have proposed to develop working women's hostel at Trichy, in the state of Tamil Nadu in India. To cater to the growing needs of working women, the DSW&WE wants to build more hostels across the state as well as upgrade the existing hostels. Providing a good quality, professionally run, safe and affordable hostels to working women will have many positive social and economic impacts. To develop the same, the DSW&WE department has set up the Tamil Nadu Working Women's Hostels Corporation Limited (TNWWHCL), a 100% government owned SPV to construct and operate these hostels in a professional manner.
2. TNSF is committed towards integrating environment, social and governance (ESG) principles into its investee companies and proposed project. KPMG Assurance and Consulting services LLP (hereinafter referred to as "KPMG") was commissioned by Tamil Nadu Infrastructure Fund Management Corporation Limited (TNIFMC) to conduct ESG due diligence of the proposed construction of the working women's hostel. The assessment included desk-based review of corporate governance of project owner, on-site investigations, on-site consultations with relevant stakeholders, identifying gaps and propose environmental and social action plan.

Objectives and scope of work

3. The objectives of conducting the ESG due diligence is to assess and rate the various ESG risks associated with the proposed project. The scope of work for the current assessment includes the following:

- Desk based review of project related information provided by the special purpose vehicle (SPV) established for construction, operation, and maintenance of the working women hostel
- Consultations with relevant stakeholder to obtain information of the site and its present status
- Review adequacy of the organizational capacity to address environmental and social impacts at the site level
- Review the status of permits/licenses applicable to the project
- Review of publicly available information on the SPV and proposed project site on any environmental and social issue representing a potential risk (e.g. any litigation, liabilities, protest, complaints etc and
- Provide an environment and social action plan.

Applicable reference frameworks

4. The assignment has been conducted in accordance with the following frameworks:

- TNSF ESGMS
- Applicable local and national environmental and social regulations
- World Bank, International Finance Corporation, Asian Development Bank guidelines

Approach and methodology

5. The ESG due diligence has been carried out based on the review of the documents provided by the SPV and the Department of Social Welfare from ESG perspective, site visit to the project site and consultations with the relevant stakeholders

- **Review of documents:** KPMG reviewed detailed feasibility report of the project site, maps, and

site-specific EMP.

- **Stakeholder identification:** Based on the review of the Detailed Feasibility Report (DFR) about the project and consultations with TNSF, KPMG identified relevant stakeholders who might impact or get impacted by the project activities
- **Site visits:** KPMG undertook half day site visit at the proposed project site in Trichy on 3rd February 2021.
- **Stakeholder consultations:** KPMG also undertook discussions with the relevant project related stakeholders like- the District Social Welfare Officer, officer from revenue department and officers from TNPHC.
- **Reporting:** This report presents key ESG issues and risks and mitigation measures for high-risk issues.

About Project Developer

6. The Tamil Nadu Social Welfare Department has established Tamil Nadu Working Women’s Hostels Corporations Ltd (TNWWHCL) in May 2019 as a Special Purpose Vehicle (SPV) under the Companies Act 2013. TNWWHCL is set up with the objective of undertaking infrastructure projects, management, and maintenance of certain projects of social welfare department such as working women hostels, creches, senior citizen homes, childcare institutions including creches and projects for third gender welfare and all related infrastructure with funding through TNIFMC.

Structure of TNWWHCL



Description of the Proposed site

Parameters	Description
Project details	Construction of working women's hostel building G+4 level Total beds- 94
Location	The site is in K. Abhishekaparum village in Tiruchirappalli district in Tamil Nadu (Site pictures provided in annexure 1)
Survey nos.	33/9
Total area	Total built up area: 1734 sq.m
Topography	The proposed project site is flat and barren land.
Present land use	The has not been used for any human habitation or agricultural and commercial activities.
Past land use	As mentioned by the site staff, the land has not been used for agricultural and commercial purposes.
Boundary	North side: Government owned land Southern side: Internal Road / Government Guest House Eastern side: Road connecting to Heber Road Western side: Land belonging to the Revenue Department
Adjoining area	District employment and career guidance center Teacher's home Office of revenue department Private residential building Lion's club Municipal corporation of Tiruchirappalli
Access road	Existing 22 ft wide road connects to the Municipal office road and 15ft wide road connects to the access road.
Land acquisition	Based on the documents available, it is understood that land has been transferred from revenue department to social welfare department. Based on the stakeholder consultation, no concerns noted with respect to the government land acquisition.



Land

7. The SW&WE department is in possession of the land at Trichy for construction of working women's hostels. TNWWHCL has executed the lease agreements with SW&WE department for a nominal lease rent of Rs.1000 per annum per site (Ref- annexure 4-Land lease document). The pictures of the site are provided in annexure 1.

Chapter 2

Regulatory Requirements and Status of Applicable Permits

Table 2: Clearances and Permissions Required by the Contractor for Project Construction

S. No	Applicable legal requirements	Regulatory authority/ Agency responsible	Status	Remarks
1.	Environmental Clearance as per Environment Impact Assessment (EIA) Notification 2006 and amendments	Ministry of Environment Forest and Climate Change (MoEFCC) or State Environmental Impact Assessment Authority (SEIAA)	Not applicable	Applicable if the project site is more than 20,000 sq. mts. Since the total built-up area is 1,734 sq.m, EC is not required for the project.
2.	Consent to Establish (CTE)/Consent to Operate (CTO) under The Air Prevention and Control of Pollution Act, 1981 and The Water Prevention and Control of Pollution Act, 1974	Tamil Nadu Pollution Control Board	Not Applicable	No Batching Plant/STP is being set up
3.	No Objection Certificate (NOC) for tree cutting	District Revenue department/ Tehsil office	Not applicable	No tree cutting proposed along the project site
4.	NOC for ground water withdrawal	State Ground and Surface Water Resources Data Centre-Water resources Department	Not Applicable	There is no water source currently in the proposed project site. As mentioned by site personnel, the water for construction stage will be met by tankers.
5.	Disposal of waste under the Construction and Demolition Waste (Management) Rules 2016	Tamil Nadu Pollution Control Board	Applicable	During construction phase, to dispose demolition and construction waste such as debris, wood, metal scrap etc.
6.	Clearance for Coastal Regulation Zone under CRZ notification dated Jan,1991 and amendments under The Environment Protection Act 1986	Government of Tamil Nadu, Department of Environment	Not Applicable	As the proposed project site does not fall within the 500 m from High Tide Line.
7.	Forest clearance under the Forest (Conservation) Act,1980.	Forest Department	Not applicable	The proposed project site does not fall under forest area.
8.	Fire NOC	Fire and Rescue Services Department, Tamil Nadu	Not Applicable	As the NOC is required for multi storied buildings, with a height of 17.25 m and above.

9.	Approval from Electrical Inspectorate for DG and other electrical equipment installation	Tamil Nadu Electrical Inspectorate	Not Applicable	As it is applicable only when there is an installation of DG and other electrical equipment.
10.	Clearance for High Tension (HT) line	Tamil Nadu Electrical Inspectorate	Not applicable	No HT lines pass through the proposed project site
11.	NOC for height clearance	Airports Authority of India	Not applicable	The clearance is required for multi-stored buildings with a height above 18 m.
12.	NOC from Railway Authority	Railway Authority	Not applicable	The proposed project site does not fall within 30 m from the railway track.
13.	Land conversion certificate	Directorate of Town and Country Planning, Government of Tamil Nadu/ Revenue Department	Not Applicable	The proposed project site is in residential area. The land allocated for women's hostel building does not require reclassification.
14.	NOC from Gram Panchayat for development of the project	Gram Panchayat	Not Applicable	The land has been already transferred to Social Welfare Department.
15.	Land lease agreement	Social Welfare Department/ TNWWHCL/ TNPHC	Applicable (Provided as annexure 4)	The proposed project land has been leased from Social Welfare Department by TNWWHCL.
16.	Planning permit and approved building plan	Revenue department, Local Municipality body	Applicable	The project plan has been approved by local authority.
17.	Registration under the building and other construction workers (regulation of employment and conditions of service) act 1996	Department of Labour, Government of Tamil Nadu	Applicable	During construction phase
18.	License under the Tamil Nadu Hostels and Homes for Women and Children (Regulation) Act, 2014.	District magistrate	Applicable	To be obtained before commencement of operations of hostel building
19.	Private Security Registration License for Security Service Providers	State's designated controlling Authority	Applicable	To be obtained before commencement of operations of hostel building

Chapter 3

Applicability of International Standards

IFC PERFORMANCE STANDARDS

IFC Performance Standards	Applicability	Coverage in the report	Remarks
Performance Standard 1 Assessment and Management of Environmental and Social Risks and Impacts	Yes	E. 17 - Availability and validity of the environmental clearance E. 18 - Environmental management plan implementation E. 19 - Assessment of environmental risks, impacts G. 2 - Grievance redressal mechanism G. 3 - Monitoring and reporting	The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan (EMP) The EMP covers: Potential environmental impacts and mitigation measures Monitoring and reporting Grievance redressal mechanism Capacity building program
Performance Standard 2 Labor and Working Conditions	Applicable only in construction phase	G. 1 - Corporate level governance policies G. 4 - Contractor management	The requirements of the performance standard to be met by the contractor during construction of hostel building

<p>Performance Standard 3 Resource Efficiency and Pollution Prevention</p>	<p>Yes</p>	<p>E. 4 - Potential soil and ground water contamination E. 6 - Construction and other waste disposal E. 7 - Source and availability of water E. 8 - Consumption of water E. 9 - Impact on water availability in the local community E. 10 - Potential impact on soil and water body nearby E. 11 - Effluent management E. 13 - Adverse impact of air water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity E. 16 - Significant environmental liabilities</p>	<p>The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan The project developer/owner has identified the sources of environmental pollution and established the control measures in Environment Management Plan. Based on the site visit, there is no significant environmental features at the site</p>
<p>Performance Standard 4 Community Health, Safety, and Security</p>	<p>Yes (Community health and safety)</p>	<p>S. 1 - Safety and security S. 2 - Community concerns S. 3 - Past legal non-compliance S. 4 - Adverse media articles, Background check of SPV, Background check of Social Welfare Department E. 14 - Loss of accessibility to the local community E. 15 - Serious environmental and social incidents</p>	<p>The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan</p>

<p>Performance Standard 5 Land Acquisition and Involuntary Resettlement</p>	<p>No</p>	<p>E. 1 - Past land use E. 2 - Any disputes/claims/ arbitration to the land E 3 - Surrounding land use</p>	<p>There was no human habitation or agricultural and commercial activities on the proposed project land. The proposed project land has been transferred to social welfare department from the revenue department and leased by TNWWHCL. No land disputes have been reported so far. Hence, this performance standard is not applicable for the project site. The IR checklist is provided as reference in annexure 2.</p>
<p>Performance Standard 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>	<p>No</p>	<p>E. 5 - Loss of biodiversity due to land clearing E. 12- Sensitive areas such as environmental, cultural and heritage site</p>	<p>Based on the site visit and review of detailed feasibility report, it is understood that the project site is not within 10 km of any protected areas (such as national park, wildlife sanctuary, biosphere reserves) or biodiversity areas.</p>
<p>Performance Standard 7 Indigenous Peoples</p>	<p>No</p>		<p>The site is habitation free therefore, this performance standard is not applicable for the project. The IP checklist is provided as reference in annexure 3</p>
<p>Performance Standard 8 Cultural Heritage</p>		<p>E12- Sensitive areas such as environmental, cultural and heritage sites</p>	<p>This performance standard is not applicable for the project site</p>

ADB SAFEGUARD REQUIREMENTS

ADB Safeguard Requirements	Applicability	Coverage in the report	Remarks
Safeguard Requirement 1 Environment Environmental Assessment Environmental Planning and Management Consultation and Participation Grievance Redress Mechanism Monitoring and reporting Unanticipated Environmental Impacts Biodiversity Conservation and Sustainable Natural Resource Management Pollution Prevention and Abatement Health and safety Physical Cultural Resources	Yes (Health and safety covered in terms of community health and safety)	E. 4 - Potential soil and ground water contamination E. 6 - Construction and other waste disposal E. 7 - Source and availability of water E. 8 - Consumption of water E. 9 - Impact on water availability in the local community E. 10 - Potential impact on soil and waterbody nearby E. 11 - Effluent management E. 12 - Sensitive areas such as environmental, cultural and heritage site E. 13 - Adverse impact of air water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity	The requirements of the performance standard have been met by the project developer/owner through the Environment Management Plan (EMP) The EMP covers: Potential environmental impacts and mitigation measures Monitoring and reporting Grievance redressal mechanism Capacity building program

ADB Safeguard Requirements	Applicability	Coverage in the report	Remarks
		E. 14 - Loss of accessibility to the local community E. 15 - Serious environmental and social incidents E. 16 -Significant environmental liabilities E. 17- Availability and validity of the environmental clearance E. 18 - Environmental management plan implementation E.19- Assessment of environmental risks impacts S. 1 - Safety and security S. 2 - Community concerns S. 3 - Past legal non -compliance G. 2 - Grievance redressal mechanism G. 3 - Monitoring and reporting G. 4 – Contractor management	
Safeguard Requirement 2 Involuntary Resettlement	No	E. 1 - Past land use E. 2 - Any disputes/claims/ arbitration to the land E 3 - Surrounding land use	There was no human habitation or agricultural and commercial activities on the proposed project land. The proposed project land has been transferred to social welfare department from the revenue department and leased by TNWWHCL.

			<p>No land disputes have been reported so far.</p> <p>Hence, this performance standard is not applicable for the project site.</p> <p>The IR checklist is provided as reference in annexure 2.</p>
<p>Safeguard Requirement 3 Indigenous Peoples</p>	No	-	<p>The site is habitation free therefore, this performance standard is not applicable for the project.</p> <p>The IP checklist is provided as reference in annexure 3</p>

World Bank Environmental, Health, and Safety Guidelines

Requirements	Applicability	Coverage in the report	Remarks
1. Environmental <input type="checkbox"/> Air Emissions and Ambient Air Quality <input type="checkbox"/> Energy Conservation, Wastewater and Ambient Water Quality <input type="checkbox"/> Water Conservation <input type="checkbox"/> Hazardous Materials Management <input type="checkbox"/> Waste Management <input type="checkbox"/> Noise <input type="checkbox"/> Contaminated land	Applicable during construction and operational phase	Nil	<p>The requirements of the performance standard will be met by the contractor during construction of hostel building</p> <p>Although, the project developer has established control measures in the Environment Management Plan.</p>
2. Occupational Health and Safety <input type="checkbox"/> General Facility Design and Operation <input type="checkbox"/> Communication and Training <input type="checkbox"/> Physical Hazards <input type="checkbox"/> Chemical Hazards <input type="checkbox"/> Biological Hazards <input type="checkbox"/> Radiological Hazards <input type="checkbox"/> Personal Protective Equipment (PPE) <input type="checkbox"/> Special Hazard Environments <input type="checkbox"/> Monitoring	Applicable during construction phase	Nil	<p>The requirements of the performance standard to be met by the contractor during construction of hostel building</p>

Requirements	Applicability	Coverage in the report	Remarks
3. Community Health and Safety <input type="checkbox"/> Water Quality and Availability <input type="checkbox"/> Structural Safety of Project <input type="checkbox"/> Infrastructure <input type="checkbox"/> Life and Fire Safety <input type="checkbox"/> Traffic Safety <input type="checkbox"/> Transport of Hazardous Materials <input type="checkbox"/> Disease Prevention Emergency Preparedness and Response	Applicable during construction phase	Nil	The requirements of the performance standard to be met by the contractor during construction of hostel building
4. Construction and Decommissioning <input type="checkbox"/> Environment <input type="checkbox"/> Occupational Health and Safety <input type="checkbox"/> Community Health and Safety	Applicable	E. 4 - Potential soil and ground water contamination E. 6 - Construction and other waste disposal E. 7 - Source and availability of water E. 10 - Potential impact on soil and waterbody nearby E. 11 - Effluent management E. 13 - Adverse impact of air water, aesthetic pollution on the environmental, cultural and heritagesites due to project activity S. 1 - Safety and security S. 2 - Community concerns	The requirements of the performance standard have been met by the project developer/owner through the Environmental Management Plan (EMP)

Chapter 4

Key Findings Section

Environment

S. No.	Topic	Key findings
E1	Any disputes/ claims/ arbitration to the land	As informed by the site personnel, there was no human habitation or agricultural and commercial activities on the land allocated for the hostel building construction.
E. 2	Any disputes/claims/ arbitration to the land	As confirmed during interview with site personnel and officers from revenue and employment office, no land disputes have been reported so far.
E. 3	Surrounding land use	The area surrounding the project site is a completely residential area. Since the working women's hostel facility is of institutional residential type, there will be no adverse impact on the current land use of the area.
E. 4	Potential soil and ground water contamination	There are no sources of industrial pollution in the immediate vicinity of the site. Also, there are no sources of ground water contamination in the site.
E. 5	Loss of biodiversity due to land clearing.	There are no schedule trees in the site. Hence, the land clearance activities for construction of the hostel does not result into the cutting of schedule trees. Also, there are no protected biodiversity hotspots around the site. The project site does not fall under forest area or ecologically sensitive zone.
E. 6	Construction and other waste disposal	There is no garbage, or any other type of solid waste dumped at the site. However, the project construction activity will generate empty paint containers, construction debris, wood, metal scrap etc.
E. 7	Source and availability of water	There is no water source currently in the proposed project site. As confirmed during interview with the site personnel, water will be sourced from bore well and corporation's piped water supply. The adjoining government offices did not report any potential contamination of the water or its unsuitability for domestic and drinking purpose.

E. 8	Consumption of water	As mentioned in DFR, total water requirement for the site is estimated at approximately 16,236 liters per day. As mentioned by site personnel, the water for construction stage will be met from borewell.
E. 9	Impact on water availability for the local community in the area	Based on the interaction with the site personnel and officer from employment office, they have not faced any water scarcity in the area during the recent past.
E. 10	Potential impact on soil and waterbody nearby	There are no waterbodies in the immediate proximity to the project site. Uyakudan canal is at approximately 500 metres from the project site. Hence no adverse impacts are foreseen on the waterbodies.
E.11	Effluent management	There is no existing effluent treatment facility in the site. The area is also served by municipal sewerage network. As per the DFR, a sewage treatment facility will be provided in the project site. Hence the overall risk on wastewater management is considered as low.
E. 12	Adverse impact of air water, aesthetic pollution on the environment, cultural and heritage sites due to project activity	There are no sites of cultural, archaeological importance in the immediate proximity to the project site. Hence no such sensitive structures are likely to be impacted by the project construction.
E. 13	Loss of accessibility to the local community	During construction phase, the movement of vehicles for transportation of construction materials and debris disposal may cause increase in air pollutants, dust pollution and high noise the surrounding area.
E. 15	Serious environmental and social incidents	Based on the interaction with site personnel and govt. officials, no incidents of environmental emergencies have occurred so far. This was also verified through google search.
E. 16	Significant environmental liabilities	The site does not store or handle any hazardous chemicals neither there is any ecologically sensitive receiving water body. Hence, there is no significant environmental liabilities for the proposed project site.

Social and Governance

S. 1	Safety and security	The project site is located in government owned land and enclosed by government offices and residential complex. Based on the interaction with officers from employment office and site personnel, no safety and security concerns have been reported. Hence, the overall risk is considered as low.
S. 2	Community concerns	Based on the interaction with site personnel, no concerns from the surrounding community have been reported.
S. 3	Past legal non-compliance	Based on the interaction with the officials from police housing corporation, no incidents of legal non-compliance have occurred.
S. 4	a. Adverse media articles b. Background check of SPV c. Background check of Social Welfare Department	Based on google search, there are no adverse news for the proposed project site. Also, we did not come across any incidents of bribery, corruption, fraud, sexual harassment, child labour, forced labour against the SPV. While conducting background check for the Social Welfare Department, we came across a corruption case that has been filed against the district social welfare officer and a health inspector. Reference: https://www.dtnext.in/News/TamilNadu/2019/02/06044548/1105643/DVAC-registers-case-against-two-govt-officials.vpf Corruption and conviction cases have been filed against the social welfare officers. Reference: https://www.dvac.tn.gov.in/stat-otherofficer https://www.dvac.tn.gov.in/convictions.html The above cases will have no impact on the project.
G. 2	Grievance redressal mechanism	A grievance redressal policy has been drafted and documented in the EMP. The same has been verified. And explained in detail in chapter 8.

Chapter 5

ESG Risk Rating

8. The ESG risk rating tool developed by TNSF under its ESG management system, has been used to identify and evaluate *material ESG risks* related to the project activities. Based on the site visit, stakeholder’s consultation and documents review, issues have been identified and evaluated for its ‘likelihood of occurrence’ and ‘severity of potential impact’ for this project.

9. The issues identified are based on the current project status and may evolve during the course of construction and operational phase.

Environmental risk rating

Category	Type of Issue	Source	Importance (in terms of financial risk to the Firm's performance)	Importance (in terms of Environmental or Social or Reputational risk to the Firm)	Total Risk Score	Dimensional Risk Score	Material Risk
Environmental	Plant land use	Due Diligence	1	2	3	51	No
	Disturbance to the land	Due Diligence	1	1	2		No
	Adverse impact in surrounding land	Due Diligence	1	1	2		No
	Potential soil contamination	Due Diligence	1	1	2		No
	Potential water contamination	Due Diligence	1	1	2		No
	Loss of biodiversity due to land clearing	Due Diligence	1	1	2		No
	Construction and other waste disposal	Due Diligence	2	3	5		Yes
	Source and availability of water	Due Diligence	2	2	4		Yes
	Contingency of water	Due Diligence	2	2	4		Yes
	Impact on water availability in the local community	Due Diligence	2	1	3		No
	Potential impact on soil and waterbody nearby	Due Diligence	1	1	2		No
	Risk management	Due Diligence	1	1	2		No
	Sensitive areas such as environmental, cultural and heritage sites	Due Diligence	1	1	2		No
	Adverse impact of an event, activities, policies on the environmental due to construction activities	Due Diligence	2	3	5		Yes
	Serious environmental incidents	Desk-Based Research	1	3	2		No
	Significant environmental liabilities	Due Diligence	1	2	3		No
	Availability and validity of the environmental clearance	Due Diligence	1	1	2		No
	Environmental management plan implementation in the project site	Due Diligence	1	1	2		No
	Assessment of environmental risks and impacts	Due Diligence	1	1	2		No

Social risk rating

Category	Type of Issue	Source	Importance (in terms of financial risk to the Firm's performance)	Importance (in terms of Environmental or Social or Reputational risk to the Firm)	Total Risk Score	Dimensional Risk Score	Material Risk
Social	Safety and security	Due Diligence	1	1	2	10	No
	Community concerns around the project site	Due Diligence	1	1	2		No
	Land acquisition	Due Diligence	1	1	2		No
	Loss of accessibility to the local community	Due Diligence	1	1	2		No
	Adverse media articles	Due Diligence	1	1	2		No

Governance risk rating

Category	Type of Issue	Source	Importance (in terms of financial risk to the Firm's performance)	Importance (in terms of Environmental or Social or Reputational risk to the Firm)	Total Risk Score	Dimensional Risk Score	Material Risk
Governance	Non-availability of anti-corruption policy	Due Diligence	3	2	5	41	Yes
	Non-availability of anti-bribery policy	Due Diligence	3	3	6		Yes
	Non-availability of inside browser policy	Due Diligence	3	2	5		Yes
	Non-availability of child labor policy	Due Diligence	3	2	5		Yes
	Non-availability of forced labour policy	Due Diligence	3	2	5		Yes
	Presence of sexual harassment policy	Due Diligence	3	2	5		Yes
	Governance administration	Due Diligence	2	1	3		No
	Monitoring and reporting	Due Diligence	1	2	3		No
	Contract management	Due Diligence	2	1	3		No
	Anti-legal non-compliance	Due Diligence	1	1	2		No

Material ESG risks for the project are listed below

Environmental	Social	Governance
1. Construction and other waste disposal	Nil	
2. Source, availability and consumption of water		
3. Adverse Impact of Air Water, Aesthetic Pollution on the Environmental Due to Construction Activities		

Chapter 6

Mitigation Action Plan

Finding reference number	Key findings	Mitigation action plan	Responsibility	Timeline	Tentative cost
E. 6	<p>Construction and other waste disposal</p> <p>There is no garbage, or any other type of solid waste dumped at the site. However, the project construction activity will generate empty paint containers, construction debris, wood, metal scrap etc.</p>	<p>The construction waste must be sent to authorized agency as per the Construction and Demolition Waste (Management) Rules 2016.</p>	<p>Contractor at the project site</p>	<p>Throughout the construction phase</p>	<p>Transportation charges based on the quantity of waste</p>
E. 7, E. 8 and E. 13	<p>Source and availability of water</p> <p>There is no current water source in the proposed site. As mentioned by site staff, the water for construction stage will be met from borewell. Utilization of water for construction will create a stress on ground water or other water sources.</p>	<p>If SPV/ contractor plans to install bore well at the site, prior approval from Tamil Nadu ground water board shall be obtained.</p>	<p>TNWWHCL or Contractor at the project site</p>	<p>Before construction</p>	<p>Application fees</p>

E. 13	<p>Adverse impact of air, water, aesthetic pollution on the environment, cultural and heritage sites due to project activity</p> <p>During construction phase, the movement of vehicles for transportation of construction materials and debris disposal may cause increase in air pollutants, dust emission and high noise in the surrounding area.</p>	<p>1. It is recommended to conduct ambient air, noise, water monitoring at the project site during construction period. Water sprinkling to be carried out at the site on daily basis to suppress dust emission. Contractor shall ensure that equipment with high noise levels are not being used during night-time to avoid impact on local community.</p>	Contractor at the project site	<p>At least twice during peak time of construction</p> <p>2. Water sprinkling to be done on daily basis</p> <p>Avoidance of high noise equipment during nighttime, throughout construction period</p>	<p>Approximate cost towards sampling - INR. 1000-2000 per sample Total about INR.300,000-350,000 based on number of samples (From NABL accredited laboratory)</p>
G. 1.	<p>Corporate governance policies</p> <p>Non-availability of governance policies on prevention of sexual harassment, anti-bribery, anti-corruption, child labour, forced labour, whistleblower.</p>	<p>TNWWHCL to develop and implement formal governance policies for prevention of corruption, bribery, child and forced labour and sexual harassment at the workplace.</p>	TNWWHCL	Before construction	Nil

Chapter 7

Informal Public Consultations

10. The objective of the stakeholder consultation process was to collect information on the project and its expected impact. It also helps to determine the concerns amongst the community.

Identification of Stakeholders

11. The stakeholders for the project at the stage of pre-construction were identified and the informal public consultations were conducted.

Interview Date: 03/02/2021

List of Participants

1. Mr. Kodanadaraman – DSWJr. assistant
2. Mr. Ananthakumar – DSWsupervisor
3. Mr. A. Kalaichelvam – District employment officer
4. Mr. D. Panneerselvam – Jr.employment officer
5. Mr. M. Dharmalingam – Jr.employment officer
6. Mr. K. Ramesh –Tahsildar officer
7. Mr. S. Nachimuthu -Site officer, Police Housing Corporation

Details of Discussion

An informal public consultation was held with the representatives on the construction of the hostel and to ascertain the impact of the hostel on the nearby areas.

Details of Discussion

- The proposed hostel details and target population and the timeline for completion was informed to the participants
- The participants were asked if they have any concerns related to the project. No concerns were raised by them.
- All the participants were supportive about the project
- In case of any grievances related to the project, the participants were asked to address it to TNWWHCL.

Ref: Annexure 1- Public Consultation Photo

Chapter 8

Grievance Redressal Mechanism

12. A Grievance Redress Mechanism for external stakeholders will be established to address matters related to environmental and social aspects of the project. The main objective of the Grievance Redressal Mechanism is to provide a time bound and transparent mechanism to voice and resolve complaints of the people affected in the project area. It is recognized that the Grievance Redress Mechanism provided does not impede or replace the grievance resolution process offered by the legal system of the country.

13. There will be three levels of Grievance Redressal Mechanisms- a) Site Level b) Project Level and c) Fund Level. At each of the levels, a minimum of 3 officers needs to be identified and their names and contact details need to be displayed in both English and Tamil in the project. At the site level, the contractor shall nominate 2-3 grievance redressal officers and their names, and the contact details shall be displayed at prominent locations in the site, in both English and Tamil. At the project level, the PMC head will be responsible for handling grievances. They will (i) record the complaints, categorize, and prioritize them; (ii) consult with all relevant stakeholders (including contractors, SHE officer), visit the project site, and do the required examination; (iii) settle the grievances in consultation with the complainant and the project staff; (iv) report to the aggrieved parties about the decision/solution; and (v) forward the unresolved cases to higher authorities for resolution. In case of complex complaints, the PMC head will inform the project director and guide him/her about practical options for resolving the grievances. At the fund level, there will be a grievance redressal officer nominated who shall handle the grievances at the fund level.

14. The main objective of the grievance redressal mechanism is to provide a transparent mechanism to resolve complaints in the project site. The site level grievance redressal officer (GRO) will be responsible for handling grievances at the site. All complaints to be logged in writing and maintained in a database. A log of all the grievances to be maintained by site GRO in an excel sheet. Every grievance received will be identified with a grievance number and the same shall be communicated to aggrieved party as an acknowledgement by the site level GRO. Grievances will be redressed within 7days from the date of lodging the complaints. If resolution attempts at the site level fail, the site will refer the complaints to the SPV level. In case, after 7 days, if there are still any unresolved issues, the complaints will be transferred to the Fund level GrievanceRedressal Committee. The grievance log will be shared by the site level GRO with SPV level GRO and project lead of the shelter fund on fortnightly basis.

15. Procedure - The GRM covers three categories of stakeholders namely external stakeholders at the project site, those affected by the project, and the investors of the Fund.

Step 1: Nomination of Site Level Grievance Redressal Officer and Management Level Grievance Redressal Officer

a) There will be a nomination of one site Level Grievance Redressal Officer by the contractor in consultation with Project Lead and ESG team of TNSF. The site level GRO, ESG Analyst and Project Lead shall conduct a rapid review of contentious issues/ disputes related to the project such as, land ownership/rights, ethnic/community rights, or labor issues, and related stakeholders, relying on existing information from the project, relevant government departments and community

around project site.

- b) The review will map who the key stakeholders to these issues are and what the nature of the debate is (informed, polarized, etc). Attention will be paid to the local dispute resolution culture and, particularly, to the capacity and track-record of stakeholders to settle disputes through mediation or constructive negotiation.
- c) There will be a nomination of one Management Level Grievance Redressal Officer by the SPV management in consultation with Project Lead and TNSF.
- d) The names, positions/designations, contact numbers and email of the site Level, SPV Level and Fund Level GROs will be displayed prominently in local language as well as in English, at the entrance to the project site.

Step 2: Receiving of grievances and complaints

- a) The grievances can be received by any or all the following means: phone, post/courier, SMS, webpage, or face-to-face. The uptake channels should be publicized and advertised at the site and on the website of TNSF and project owner.
- b) A Grievance Register (GR) will be maintained at the Project Site Office for recording the grievances. The site Level GRO will record the grievance/ complaint if communicated verbally by the aggrieved party.
- c) It is important that all complaints are logged in writing and maintained in a database. A central log of all the grievances received through the above means will be maintained by the site Level GRO, in an excel file.
- d) Staff members who receive complaints verbally should put them in writing into the central grievance log, for them to be tracked.
- e) Any grievances received anonymously should also get recorded in the grievance log.
- f) Every grievance received will be identified with a grievance number and the same shall be communicated to the aggrieved party as an acknowledgement verbally or in-writing by the site Level GRO within 24 hours of the receipt, also telling him/her when to expect further information.

The record of communication of the acknowledgement will be maintained by the site Level GRO in the central grievance log.

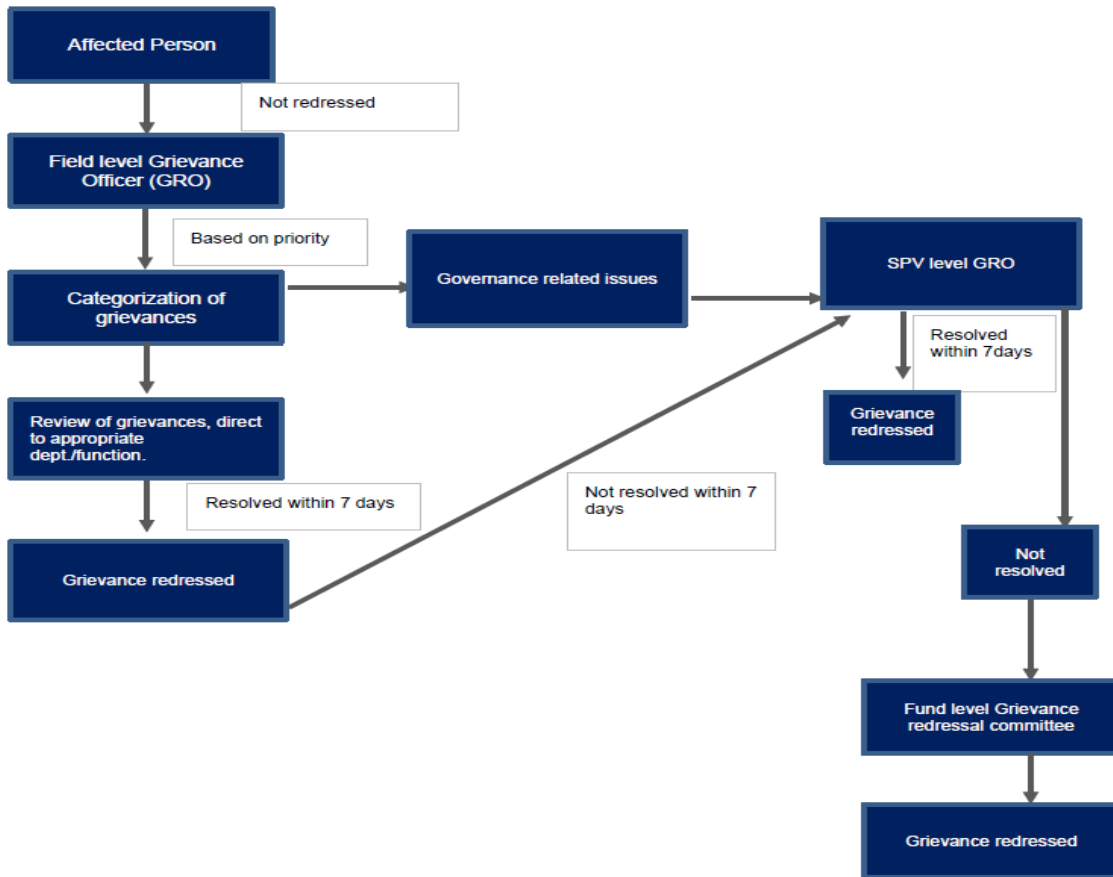
Step 3: Resolution of grievances and complaints

- a. Grievances will be categorized by the Site Level GRO as high, medium and low priority according to the type of issue raised (e.g. physical and economic displacement, grievance from indigenous population, inconvenience caused by vehicular movements, accidents, near-misses, pollution, etc.) and the impact of the project on the environment/aggrieved party.
- b. A high priority grievance may be those that can have an impact beyond the activity period and the impact may be irreversible if not acted upon immediately; medium priority grievances are those where the impact is fairly moderate and can be reversed with corrective measure; low priority grievances are those which are short-term and can be resolved through bare minimum or minor corrections.

- c. Based on this categorization and seriousness of the issue raised, the Site Level GRO will prioritize the complaints for appropriate follow up action.
- d. The Site GRO will review the grievances / complaints received and direct it to the appropriate function/ department for necessary action, keeping the project site head/ in-charge in loop.
- e. It is anticipated that the majority of issues raised will be informational in nature or feedback that requires small course corrections; these should generally be handled at the site by the representatives of project owner.
- f. Issues having to do with governance will be addressed at the SPV level, with the involvement of the SPV GRO.
- g. The function/ department will revert to the Site GRO with their response as soon as possible but not later than 7 days of receipt of complaint, including any action deemed necessary, along with the site head's approval for the same.
- h. In case, the Site Level GRO is not able to resolve the grievance, the grievance will be submitted to SPV Level GRO and the total time to resolve should not more than 7 days (including site Level and SPV Level GRO).
- i. In case, after 7 days, if there are any unresolved issues, the complaint will be transferred to the Fund-Level Grievance Redressal Committee for resolution within the next 7 days.
- j. The Site Level GRO will be accountable for the timely closure of all the grievances received from the external stakeholders at the site and those affected by the project at project site.
- k. The Site Level GRO will communicate the response and action taken to the aggrieved party and obtain their acknowledgement.
- l. Basis the acknowledgement received from the aggrieved party, the Site Level GRO will close the complaint in the grievance log.
- m. The grievance log will be shared by the Site Level GRO with the SPV Level GRO and Project Lead of TNSF on fortnightly basis.
- n. The grievance log will also be included in the quarterly project progress reports submitted to TNSF's ESG Team.
- o. The Project Lead in consultation with the Site Level GRO, SPV Level GRO and Fund Level GRC will ensure that all the grievances are closed within the quarter.
- p. The site will maintain at a minimum, a database on the following metrics:
 - i. Number of complaints received
 - ii. Number of complaints resolved
 - iii. Details of the complaints that have gone to mediation (through arbitration or involvement of other parties like – community representatives, legal representatives, TNSF legal counsel, etc.)
 - iv. Grievance and complaints received from investors

- v. The names displaying the Grievance Committee Members at Project and Site Level

Flow chart of Grievance Redressal Mechanism



Chapter 9

Conclusion

16. Based on the due diligence conducted, no major ESG risk to the proposed project was noted. Overall, 34 ESG issues were evaluated using the ESG risk rating tool of which 10 are considered as *material ESG risks* for the proposed project. *Project risk level is 25%*. Hence, it is *medium risk level project*. Key findings of the study in connection to environmental, social and governance issues are:

- No concerns are noted with respect to land acquisition
- There is no human habitation, trees or any other establishments on the proposed project site, as a result no dislocation, demolition of houses or structures will be required due to the construction activities
- No potential negative impact has been identified for this project.

17. Way Forward

This Due Diligence Report will be further updated with community consultations and meetings with other stakeholders.

Annexures

Annexure 1- Site pictures

Project site



Access road to the site



Main entrance to the site



Stakeholder consultation



Annexure 2- Involuntary Resettlement Impact Assessment with COVID-19 Screening Checklist

Information on subsection/section:

District/administrative name: Trichy

Location (km): K.Abhishekapuram Village

Civil work dates (proposed): April 2022

Technical description: The project involves construction of a single block with a G+4 level structure and a total capacity of 96 beds.

Screening Questions for Involuntary Resettlement Impact

Below is the initial screening for involuntary resettlement impacts and due diligence exercise. Both permanent and temporary impacts must be considered and reported in the screening process.

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
Involuntary Acquisition of Land				
1. Will there be land acquisition?		√		The land is a government land taken on lease for the purpose of construction of the project through a government order.
2. Is the site for land acquisition known?				
3. Is the ownership status and current usage of land to be acquired known?				The land was previously owned by Revenue department of GoTN and was a vacant land.
4. Will easement be utilized within an existing Right of Way (ROW)?	√			
5. Will there be loss of shelter and residential land due to land acquisition?		√		
6. Will there be loss of agricultural and other productive assets due to land acquisition?		√		The land is a barren land and there will be no loss of agricultural or other productive assets.
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?		√		The site is filled with wild growth of weeds and shrubs and there are no trees in the site.
8. Will there be loss of businesses or enterprises due to land acquisition?		√		The land is vacant, and no business has been established at the site.
9. Will there be loss of income sources and means of livelihoods due to land acquisition?		√		The site is a barren land at time of acquisition
Involuntary restrictions on land use or on access to legally designated parks and protected areas				
10. Will people lose access to natural resources, communal facilities, and services?		√		

11. If land use is changed, will it have an adverse impact on social and economic activities?		√		
Will access to land and resources owned communally or by the state be restricted?		√		
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project? <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A				
Are any displaced persons from indigenous or ethnic minority groups? <input type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A				

D. COVID-19 Risk Screening for Involuntary Resettlement Impact Assessments

Risk screening questions	Yes	No	Not sure	Remarks
Will project preparation be affected by the inability of experts/consultants, to visit the project site because of the pandemic?		√		COVID-19 has not affected the project evaluation.
Is the project likely to face challenges in achieving meaningful consultation because of the pandemic? If yes, please clarify the types of consultations to be affected and at what stages in social safeguards planning and implementation. Examples: Project consultants are unable to travel to the project site and meet with affected people for RP planning; the project will face challenges in conducting with communities, etc.		√		
Is the project likely to face challenges in preparing safeguards assessments/planning instruments and/or implementing social safeguards plans because of the pandemic? Please be as specific as you can in the remarks section. Example: The project might face challenges in conducting inventory of assets/DMS, arranging for adequate valuations, or conducting other related due diligence (e.g., cadastral mapping or title search) due to COVID-19 restrictions.		√		

Note: The project team may attach additional information on the project, as necessary.

Annexure 3 - Indigenous People Impact Assessment with COVID-19 Screening Checklist

Information on project/subproject/component:

District/administrative name: Trichy District

Location (km): K.Abhishekapuram Village

Civil work dates (proposed): April 2022

Technical description: The project involves construction of a single block with a G+4 level structure and a total capacity of 96 beds.

C. Screening Questions for Indigenous People Impact

KEY CONCERNS (Please provide elaborations in the "Remarks" column)	YES	NO	NOT KNOWN	Remarks
A. Indigenous People Identification				
1. Are there socio-cultural groups present in or using the project area who may be considered "tribes" (hill tribes, scheduled tribes, tribal people), "minorities" (ethnic or national minorities), or "indigenous communities" in the project?		√		The land is uninhabited.
2. Are there national or local laws or policies as well as anthropological researches/studies that consider these groups present in or using the project area as belonging to "ethnic minorities," scheduled tribes, tribal people, national minorities, or cultural communities?		√		
3. Do such groups self-identify as being part of a distinct social and cultural group?		√		
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?		√		
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?		√		
6. Do such groups speak a distinct language or dialect?		√		
7. Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?		√		
8. Are such groups represented as "indigenous people," "ethnic minorities," "scheduled tribes," or "tribal populations" in any formal decision-making bodies at the national or local levels?		√		
B. Identification of Potential Impacts				

KEY CONCERNS (Please provide elaborations in the “Remarks” column)	YES	NO	NOT KNOWN	Remarks
9. Will the project directly or indirectly benefit or target indigenous people?		√		
10. Will the project directly or indirectly affect indigenous people' traditional sociocultural and belief practices (e.g., child-rearing, health, education, arts, and governance)?		√		
11. Will the project affect the livelihood systems of indigenous people (e.g., food production system, natural resource management, crafts and trade, employment status)?		√		
12. Will the project be in an area (land or territory) occupied, owned, or used by indigenous people, and/or claimed as ancestral domain?		√		
C. Identification of Special Requirements Will the project activities include:				
13. Commercial development of the cultural resources and knowledge of indigenous people?		√		
14. Physical displacement from traditional or customary lands?		√		
15. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, and spiritual uses that define the identity and community of indigenous people?		√		
16. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		√		
17. Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		√		

D. Indigenous People Impact

After reviewing the answers above, executing agency/ safeguard team confirms that the proposed subsection/ section/subproject/component (tick as appropriate)

[] Has indigenous people (indigenous people) impact, so an indigenous people plan (IPP) or specific indigenous people action plan is required.

[√] Has No indigenous people impact, so no IPP/specific action plan is required

COVID-19 Risk Screening for IP Impact Assessments

Risk screening questions	Yes	No	Not sure	Remarks
Will project preparation be affected by the inability of experts/consultants, to visit the project site because of the pandemic?		√		All the site visits and consultations have been completed and were not disrupted due to the COVID pandemic.
Is the project likely to face challenges in achieving meaningful consultation because of the pandemic? If yes, please clarify the types of consultations to be affected and at what stages in social safeguards planning and implementation. Examples: Project consultants are unable to travel to the project site and meet with affected people for IPP planning; the project will face challenges in conducting culturally appropriate consultations with IP communities, etc.		√		
Is the project likely to face challenges in preparing safeguards assessments/planning instruments and/or implementing social safeguards plans because of the pandemic? Please be as specific as you can in the remarks section.		√		

Annexure 4- Land Lease Agreement



7044/2022

LEASE AGREEMENT

THIS Lease Agreement ("Agreement") is made at Trichy on this 6th day of October 2022

BETWEEN

DIRECTOR OF SOCIAL WELFARE, GOVERNMENT OF TAMIL NADU,

having its office

at Panagal Maligai, 2nd Floor, Saidapet, Chennai and acting through its Authorized Signatory, District Social Welfare Officer, Trichy District, duly authorized by the Director of Social Welfare hereinafter referred to as the "Lessor" or "Department of Social Welfare" which expression shall unless it be repugnant to the context or meaning thereof be deemed to mean and include its successors and permitted assigns of the **First Part**;

AND

TAMIL NADU WORKING WOMEN'S HOSTELS CORPORATION LIMITED, a company

incorporated under the provisions of the Companies Act 2013 and having its registered office at No.19, TP Scheme Rd, Raja Annamalai Puram, Chennai, Tamil Nadu 600028 hereinafter referred to as the "Company" or "TNWWHCL" or "Lessee" which expression shall unless it be repugnant to the context or meaning thereof be deemed to mean and include its successors and permitted assigns of the **Other Part**.

The Lessor and the Lessee are hereinafter, wherever the context may so require, individually referred to as "**Party**", and collectively referred to as "**Parties**".

WHEREAS:

- The Lessor, Director of Social Welfare, is seized and possessed of or otherwise well and sufficiently entitled to the plot of land to be mentioned in the prescribed format of **Schedule "A"** (collectively referred as "**Said Land**"), hereunder written and delineated on the plan annexed hereto and shown with red colour boundary line thereon.
- The Lessee, Tamil Nadu Working Women's Hostels Corporation Limited, is a Special Purpose Vehicle (SPV) promoted by the Department of Social Welfare, Government of Tamil Nadu and is engaged in the business of Development and Operation of Working Women Hostels and similar assets and possesses the requisite skills, expertise and financial ability required for the development of the Said Land.
- The Lessor is now desirous to utilize the potential of the Said Land for developing and operating the Working Women Hostel through the Lessee and has accordingly agreed to lease the land to the Lessee, including agreed to grant the right to enter and all other incidental and related rights in respect of the Said Land in favor of the Lessee on the terms and conditions mutually agreed upon between the Parties.
- Also, the Lessor has agreed to lease unto the Lessee the Said Land together with the right to construct a building or buildings and/or structures/ superstructures thereon, and the management, operations & maintenance of the same, including renting of the development or any part thereof

மாவுட்ட சமூகநல அலுவலர்
திருச்சிராப்பள்ளி

Chief Executive Officer
Tamil Nadu Working Women's
Hostels Corporation Ltd.

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Registering Officer



to any party, for an initial period of 28 years, with the exclusive option to the Lessee to extend it for another 27 years, for a consideration, detailed herein below and upon the terms and conditions recorded herein.

- E. In pursuance to the aforesaid understanding and subject to the terms contained hereinafter, the Lessor and the Lessee have agreed to reduce into writing the mutually agreed terms and conditions agreed upon between them.

NOW THIS AGREEMENT WITNESSETH AS FOLLOWS

1. DEFINITIONS AND INTERPRETATION

"Agreement" means this Lease Agreement dated _____ including the Recitals, Schedules, Annexure/s and any amendments, addendums, thereto and any supplementary agreements made pursuant to and in accordance with the provisions of this Agreement shall be read as part and parcel of this Agreement;

"Applicable Law" shall mean and include all applicable (i) statutes, enactments, acts of legislature or parliament, laws, ordinances, rules, bye-laws, regulations, listing agreements, notifications, guidelines or policies of any jurisdiction and (ii) judicial, quasi-judicial and/or administrative decisions, interpretations, directions, directives, licenses, permits, judgments, writs, injunctions, arbitral awards, decrees, orders, terms and conditions of governmental or regulatory approvals or agreements with any governmental or regulatory authority or Statutory Authority;

"Approvals" mean and include all sanctions, permissions, consents, validations, confirmations, permits, licenses, and other authorizations required to be obtained from any national, state, local or similar government, governmental, regulatory or administrative authority, branch, agency, statutory body or commission in relation to the construction and operation of the hostels as part of the Project in accordance with the terms of the Agreement;

"Built Up Area" shall mean the entire built up area in the Project, which includes for the purposes of this Agreement, the common areas and amenities developed as part of the Project such as staircases, arcades, electric room, lift room, circulation area but shall not include the open car park space and terrace and other utility areas outside the buildings;

"Common Areas" means the common areas of the Project including the roads, driveways, parks and landscaping, security areas, areas where common facilities and equipment for provision of support services are installed, common open spaces, common open areas, common green areas, corridors, hallways, stairways, lifts, passage-ways, common lavatories, generator of sufficient capacity for lifts, escalators, pump and lighting for common spaces, pump room, sewage treatment plants, generator rooms and security rooms including the infrastructure and other facilities in the Project as may be provided for common use;

"Development Right/s" shall mean the right to enter in or upon the Said Land to build, construct and do all other incidental and ancillary activities which are necessary

50.24
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Registering Officer
Chief Executive Officer
Tamil Nadu Working Women's
Hostels Corporation Ltd.
THE SEAL
OF THE
REGISTERING
OFFICER