

Draft Environment, Social, and Governance Due Diligence Report

May 2025

IND: Working Women's Hostel, Sivagangai by Tamil Nadu Working Women's Hostels Corporation

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

CURRENCY EQUIVALENTS

(as of 27 Dec 2024)

Currency Unit – Indian Rupees (INR)

INR1.00 – \$0.012

\$1.00 = INR 85.02

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Abbreviations

Abbreviation	Extension
BMTPC	Building Materials and Technology Promotion Council
BUA	Built-up Area
CPCB	Central Pollution Control Board
CTE	Consent to Establish
CTO	Consent to Operate
DG set	Diesel Generator Set
DSWO	District Social Welfare Officer
EIA	Environmental Impact Assessment
E&S	Environmental and Social
EHS	Environmental, Health & Safety
EMC	Environmental Management Centre LLP
EPF	Employee Provident Fund
ESAP	Environmental and Social Action Plan
ESGDD	Environmental Social and Governance Due Diligence
ESGMS	Environmental, Social and Governance Management System
ESI	Employee State Insurance
EWS	Economically Weaker Sections
FSI	Floor Space Index
HSE	Health, Safety and Environment
INR	Indian National Rupees
KWH	Kilo Watt Hour
KVA	Kilo Volt Ampere
LPG	Liquified Petroleum Gas
NABL	National Accreditation Board for Testing and Calibration Laboratories
NOC	No Objection Certification
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PMC	Project Management Consultant
PUC	Pollution Under Control
RCC	Reinforced Cement Concrete
SPCB	State Pollution Control Board
SW&WE	Social Welfare and Women Empowerment Department
TIDCO	Tamil Nadu Industrial Development Corporation
TNIFMC	Tamil Nadu Infrastructure Fund Management Corporation
TNPCB	Tamil Nadu Pollution Control Board
TNSF	Tamil Nadu Shelter Fund
TNWWHCL	Tamil Nadu Working Women’s Hostel Corporation Limited

1. Introduction

1.1 Background

1. Tamil Nadu Infrastructure Fund Management Corporation Limited (hereafter referred to as TNIFMC), is an Asset Management Company (AMC) promoted by Government of Tamil Nadu (GoTN) for the purpose of raising and managing alternative investment funds focused on sectors like infrastructure, affordable housing etc. TNIFMC is managing Tamil Nadu Shelter Fund (TNSF) which is registered as a Category I (Social Venture) Alternative Investment Fund, with a mandate to invest in affordable housing projects in Tamil Nadu.

2. The primary focus areas of TNSF are:

- Affordable housing- with focus on housing for the Economically Weaker Section (EWS) and Low-Income Groups (LIG)
- Hostels- for working women from all sections of the society.
- Industrial housing for workers in and around Industrial complexes/Parks/Clusters.
- Senior and assisted living
- Others- Rental housing for students, co-living spaces etc.

3. Tamil Nadu Working Women's Hostel Corporation Limited (TNWWHCL) will be responsible for the management, coordination and execution of the present project funded by TNIFMC. TNWWHCL is considering an investment in a "Working women hostel Project" located at Kanjirangal Village, Sivagangai, district, Tamil Nadu. As part of the investment process, TNIFMC has hired Grant Thornton Bharat LLP (hereinafter referred to as "GT Bharat"), a sustainability and environmental and social (E&S) services firm, to conduct the environmental social and governance (ESG) due diligence for the proposed project.

1.2 Primary Objective and Scope of Study

4. The objective of conducting the ESG due diligence is to assess the ESG risks associated with the proposed project. The primary objective is to identify, mitigate and recommend appropriate measures to improve the ESG performance of the proposed project to aid TNSF to make an informed decision on the proposed investment.

1.3 Scope of Work

5. Assessment of environmental, social and governance aspects of the project owner and proposed project against the applicable standards. The consultant will use the TNIFMC's ESG policy, Asian Development Bank, World Bank, and International Finance Corporation (IFC) Performance Standards. The assessment will include but is not limited to the following aspects:

A. Background check of project-owner/- on corporate governance including policies and incidents related to anti-bribery and anti-corruption, fraud, whistle-blower, diversity and inclusiveness, prevention of sexual harassment, child labour, forced labour, environmental health and safety policies, governance structure, regulatory compliances, incident against Key Management Personnel of the project owner/promoter/sponsor etc.

B. On-site investigation with respect to:

- Past land use of the site and lease agreement review
- Whether there are any disputes/claims/arbitration in any court of law pertaining to the land
- Surrounding land use
- Area geology, and potential soil and ground water contamination
- Loss of biodiversity due to land clearing, waste disposal
- Sources and availability of water (ground/surface),
- Consumption of water
- Impact on water availability for the local community in the area
- Potential impact on soil and water bodies nearby
- Effluents- type and quantity of effluents generated, are there any hazardous effluents generation, is there an effluent treatment plant, effluents (quality and quantity) and pollution prevention measures in line with local laws, standards, and regulations.
- Proximity to sensitive areas such as environmental, cultural and heritage site
- Adverse impact on air, water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity
- Loss of accessibility to the local community
- Past track record- have there been any serious environmental or social incidents in the past.
- Liabilities- Is the project exposed to potentially significant environmental liabilities, such as those arising from land or ground water contamination, related to the company's past or ongoing operations? Is the company exposed to potentially significant health and safety liabilities, such as those from ongoing or future claims from negatively affected workers and/or communities?
- On-site consultation with relevant stakeholders such as the local community, key regulatory authorities, etc.
- Review with respect to the site on these mandatory topics:
 - Past legal non compliances/ incidents of violation of laws
 - Adverse media articles
 - Any voluntary or involuntary resettlement (physical and economic) scenarios due to the project
 - To assess whether designs are certified by licenses structural engineers for their structural stability and safety including seismic and wind forces.
 - Project related regulatory documents- consents/ permits/ licenses obtained so far against those applicable for the project.
 - Assess the capacity of the project owner/ to deal with the environmental and social risks and impacts and implement appropriate training and capacity building measures for safeguard compliance.
 - Due Diligence will also be conducted if the project has any "associated facilities" that are not funded as part of the project (funding may be provided separately by the borrower or by third parties) if those facilities viability and existence depend exclusively on the project and whose goods or services are essential for successful operation of the project.
 - As per ADB safeguard requirements available in SPS 2009: Safeguard Requirements 1: Environment (Appendix 1, page 30, para 4)- At an early stage of project preparation, it is required to identify potential direct, indirect, cumulative,

and induced environmental impacts on and risks to physical, biological, socioeconomic, and physical cultural resources and determine their significance and scope, in consultation with stakeholders, including affected people and concerned NGOs. The project owner/ promoter/ sponsor shall assess cumulative and induced impacts due to further development of similar projects or other projects in the area, as appropriate.

- Review of any established baseline for common natural resources, livelihoods, social interactions, support systems, other social and cultural characteristics by the project owner/ promotor/ sponsor
- Review of metrics or indicators to gauge the effectiveness of grievance redressal procedures defined by the project owner/promoter/sponsor.

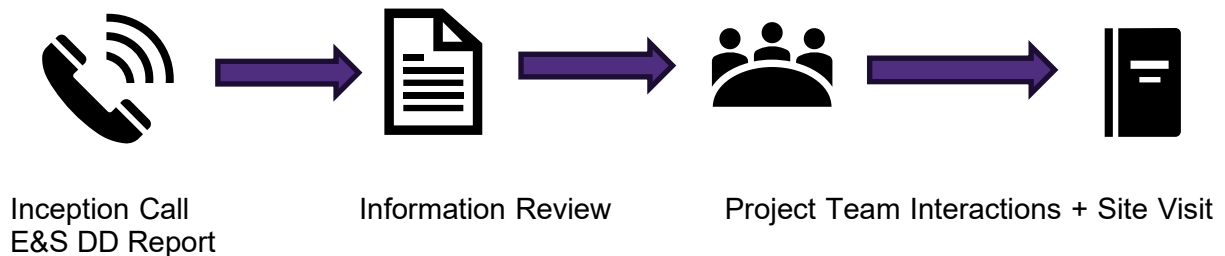
1.4 Reference Framework for ESG Due Diligence

6. The reference framework for ESG–DD includes:

- TNSF’s EGSMS
- National, State (Tamil Nadu) and sector specific rules and regulations covering ESG aspects.
- World Bank, International Finance Corporation and Asian Development Bank Guidelines

1.5 Approach and Methodology of ESG Due Diligence

7. The approach and methodology adopted for ESG Due Diligence is presented in the subsequent subsections.



1.5.1 Inception Call

8. An inception call was conducted with the Company with the following objectives:
- Obtain an overview of the project and status.
 - Discuss Site visit and project data requirements.
 - Explain the approach and methodology adopted for the ESG Due Diligence.

1.5.2 Information Review

9. GT Bharat prepared a Project Information Sheet for obtaining information about the project and its management. A detailed list of documents and records required for review and aligned to the reference framework was shared with the Company in the sheet. Additional requests for information were made based on the outcomes of the subsequent interactions. The documents and records received from the target company were reviewed for scoping the project.

1.5.3 Environment and Social Site Visit

10. **Environment and social** site visit was conducted on 27 November 2024 at the Client project site with the District Social Welfare Officer (DSWO), Social Welfare and Women Empowerment Department (SW&WE). Team interactions were held between the management and with the site team to corroborate the project details received through documents. The stakeholders informed the subproject site does not have any major concerns.

1.5.4 Team Interaction

11. Assessment of the project site and project management was conducted through discussions with DSWO, Social Welfare and Women Empowerment Department. on the following topics:

- Understanding the following aspects of project implementation:
 - EHS management measures adopted in the project.
 - E&S Legal Compliance management in the project
 - Organization structure at project level and entity level implementation of environmental and social aspects of the project.
 - Contractor management with fair wages, equal remuneration, inter-state migrant workers, building construction workers, contract labour etc.
- Measures planned/undertaken on environment, health & safety management at the project site including safe work practices, waste management, training of workers, incident management, emergency preparedness & response and local community grievance redressal.
- Practices on human resource management including payment of wages, hours of work, leaves, worker grievance handling, procedures of prevention of sexual harassment for women workers, labour accommodation.
- GHG emissions sources and mitigation, water and energy conservation measures adopted.

1.6 Limitation of the Study

12. The present E&S Due Diligence of the proposed project is compiled based on the E&S site visit observations and the documentation provided by the developer. The data and findings presented herewith are to the best of knowledge of the E&S consultant.

2. Project Overview

13. The Working Women's Hostel is a residential project proposed on greenfield site. The project is to be developed in a built-up area covering 673.05 m² located at Kanjirangal Village, Sivagangai, Sivagangai District, Tamil Nadu. The land is presently under the Revenue Department of Tamil Nadu. The process of land transfer from revenue to the SW&WE department is ongoing. Post land transfer to SW&WE department, the land will be leased to TNWWHCL for a period of 28 years. The project will be constructed in 6 months. At present no construction activity is ongoing at the project site.

2.1 Current Status of the Project

14. Project is presently in the design phase, during which essential preparatory activities are being undertaken. The commencement of construction is contingent upon securing all requisite approvals from the relevant authorities. This phase ensures that all regulatory, technical, and logistical requirements are addressed to facilitate a smooth transition into the construction phase. The land lease documents for the same will be updated in the updated DDR.

2.2 Project Location, Connectivity and Land Use Land Cover

15. The Project is located at 9.869453662645219 N, 78.49381923211276 E, Survey No:162/2 in Kanjirangal Village, Sivagangai District, Tamil Nadu.

Figure 1: Project Location



2.3 Land

16. The land is presently under the Revenue Department of Tamil Nadu. The process of land transfer to the SW&WE department is ongoing. Post land transfer to SW&WE department the land parcel will be leased to TNWWHCL for a period of 28 years. The TNWWHCL have

selected the Kanjirangal Village, Sivagangai (Geo-coordinates 9.869453662645219 N, 78.49381923211276 E) as a potential infrastructural hub for the project based on land viability assessments, the land is classified as residential spanning an area of 2,024 m² notably the site has no vegetation and no damage to physical environment has been recorded. Further due diligence has confirmed that the land is neither occupied by any individual or community nor used for any productive purpose, the land is not used for any cattle rearing or cattle grazing, and there are no known disputes or claims related to settlements or displacements and the land has no legacy related issues. A site inspection has identified some shrubs and vegetation around the site and approaching road which will be cleared during construction phase.

2.4 Topography

17. The project site is located in Kanjirangal Village, Sivagangai and it exhibits a generally flat topography with a gentle slope. The land is situated at an altitude of 124 meters above the mean sea level. The ground level is relatively flat, and soil condition appears suitable for the development.

2.5 Connectivity

Table 1: Connectivity to the project site

S. No.	Site location from key focal nodes	Observation
1.	Project Borders	The project site is in Kanjirangal Village, Sivagangai district, with the geographical coordinates 9.869453662645219 N and 78.49381923211276 E.
2.	Highway/ Access Road	National Highway (NH) 85 Cochin-Munnar-Bodinayakanur-Theni-Madurai City-Sivagangai -Thondi, NH 36 Villupuram-Panruti-Kumbakonam - Thanjavur-Pudukottai-Tirupathur-Sivagangai -Manamadurai and State Highway SH 34 Ramanathapuram-Ilayankudi-Sivagangai -Melur are the major roads passing via Sivagangai .
3.	Railway Station	Sivagangai railway station is located in the east side of town at 3km distance from the site, where the railway line of Trichy-Rameshwaram joins and this is serving as Guard line for Virudhunagar to Tiruchirapalli Jn for southern districts trains to reach Chennai.
4.	Bus station	The nearest bus station is Sivagangai Bus Stand at distance of 3.5 km. It serves as the primary terminus for a diverse array of buses, ranging from state-run government buses to private and interstate services.
5.	Airport	The nearest airport is the Madurai International Airport 43 km away from the town.

2.6 Social Infrastructure

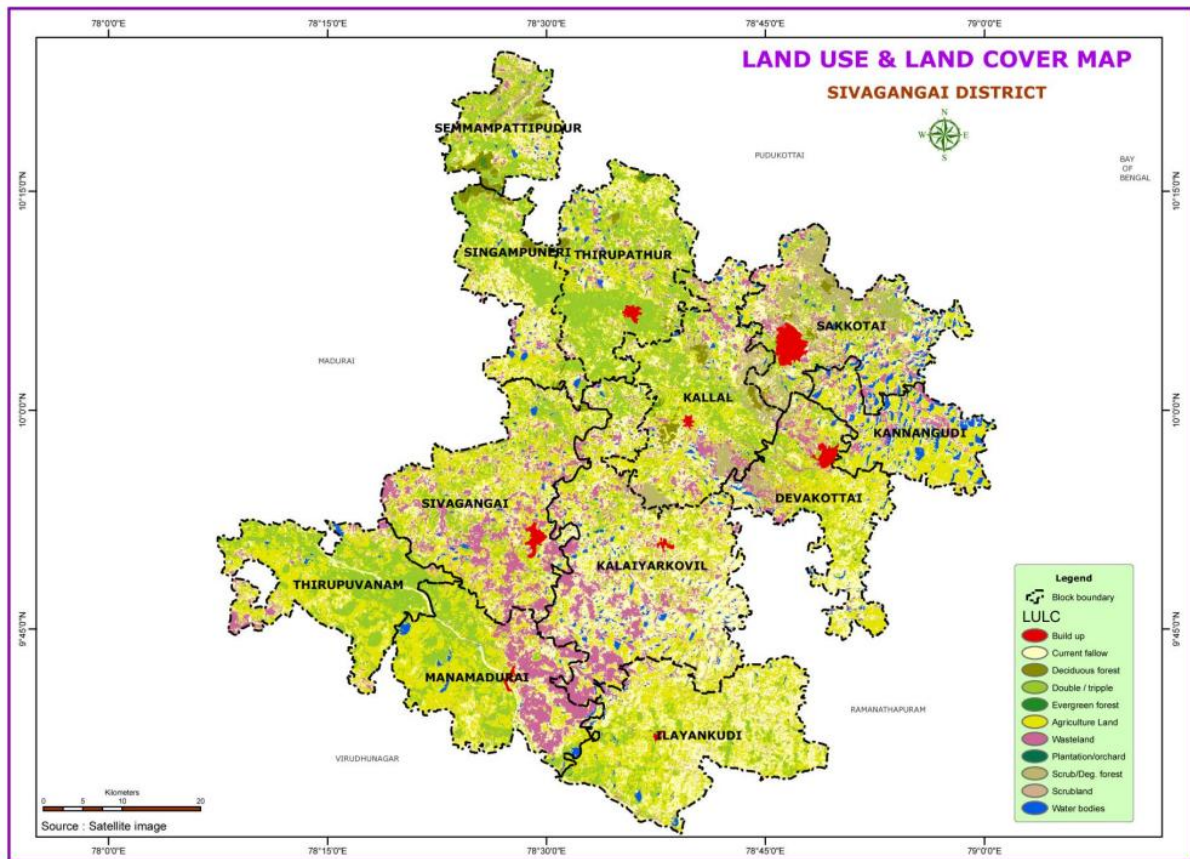
Table 2: Social Infrastructure

Schools	<ul style="list-style-type: none"> • Oxford Matriculation Higher Secondary School, 1.8 km • Mother Teresa Matriculation School, 2.4 km • Government Girl's Higher Secondary School - Sivagangai , 2 km • Government Higher Secondary School – Sivagangai , 2.5 km • St.Michael Matriculation Higher Secondary School, 3.6 km
Health facilities	<ul style="list-style-type: none"> • Government Hospital, Sivagangai , 5 km • Sai Aaryan Hospital, 2.5 km • Karthik multi-speciality Hospital, 3.2 km • Sabari Maternity and Children Hospital, 3 km • Dr.Balakumaran, MDS (Endodontist), Vijayaganesh Dental Hospital , Sivagangai , 2.8 km
Colleges	<ul style="list-style-type: none"> • Government Sivagangai Medical College Hospital, 5 km • Government Women Arts and Science College – Sivagangai, 750 m
Police station	<ul style="list-style-type: none"> • Sivaganga District Police Office, 1.5 km

2.7 Land Use and Land Cover

18. The physical and biological characteristics of the Earth's surface, including both natural and man-made features, are described by the term "land cover". It classifies what can be seen on the ground, including metropolitan areas, deserts, wetlands, grasslands, and aquatic bodies. It also includes agricultural fields and forest regions.

Figure 2: District Irrigation Plan, Sivagangai District.



19. The land use of Sivagangai is distributed majorly among agricultural land, waste land double/triple category, a significant number of waterbodies and small patches of build-up areas as shown in the land use landcover map above.¹

2.8 Hydrology

20. The average depth of the water level during pre-monsoon level is 1.9 m to 16.2 meters and for monsoon period the water level is 0.57m to 15.5m. ²

¹ District Irrigation Plan, Sivagangai District

² District Disaster Management Plan, 2022-2023



3. Key Findings Section


3.1 ESG Risk Rating Tool

21. TNWWHCL has developed an ESG risk rating tool under its ESG management system, to identify and evaluate material ESG risks related to the project activities. Based on the site visit, stakeholders' consultation and documents review, issues have been identified and evaluated for its "likelihood of occurrence" and "severity of potential impact" for this project.

22. The risk scoring is based on the analysis of different type of environment, social and governance risk to the project, intensity of the risk and the nature of impact to the project. Upon evaluating this, a risk score is generated and based on the scores, a risk categorization is selected as A, B or C. If the project categorization is A, the deal does not go through, if the risk categorization is B, then it is considered as Medium Risk and mitigation measures are suggested and when the risk categorization is C, it is considered as low risk and generally no or low mitigation steps are required. The issues identified are based on the current project status which is in pre-construction stage and may evolve during construction and operational phase. The project faces certain environmental risks like availability of ground water, pollution due to construction activities, social risks like lack of stakeholder engagement plan and grievance redress mechanism among other risks to list a few. Hence, the overall risk rating falls in "Medium" risk on project risk rating scale.

ESG Due diligence – Working Women's Hostel, Kanjirangal Village, Sivagangai Tamil Nadu
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Observations		Highly adverse impact	Moderately adverse impact	Low adverse impact	No adverse impact	Needs Investigation
Basic ESG Screening		0	3	9	24	0
	Environment	0	1	2	7	0
	Social	0	2	5	6	0
	Governance	0	0	0	9	0
Social Safeguards Screening		0	0	11	26	0
	Involuntary Resettlement	0	0	0	11	0
	Indigenous Population	0	0	5	5	0
	Stakeholder Identification and Grievance Mechanism	0	0	4	5	0
Total		0	3	20	50	0

Regulations Screening	
Obtained	0
Under process	0
Not applied for	8
Not applicable	14
Project Categorization Overall	
	<div>B</div> <div>Note: Does not include output of Climate Risk and Regulations Screening</div>


Climate Risk Screening		
Criteria	Score / Risk	
Location and Design of Project	4	
Maintenance and Materials	2	
Overall Risk	medium-risk	
Project Categorization - Risk Scale		

Table 3: Environmental, Social and Governance Score

Environment	0 Highly Adverse, 1 moderately adverse, 2 low impacts, 7 no adverse impact
Social	0 Highly Adverse, 2 moderately adverse, 5 low impacts, 6 no adverse impact
Governance	0 Highly Adverse, 0 moderately adverse, 0 low impacts, 9 no adverse impact

23. The material risks identified from the tool includes the following.

Table 4: Material Risks Identified

Environment	Development of climate change and Risk management plan	The plan shall be developed to address concerns related to climate change and develop adequate mitigation measures at all stages of project (pre-construction, construction, and operation phase).
	Extraction of groundwater	The plan shall be developed to address concerns related to climate change and develop adequate mitigation measures at all stages of project (pre-construction, construction, and operation phase).
	Measures during Demolition of old structure	The plan for disposal of the demolition waste (If any at the site) shall be developed with identified adequate dump yard for disposal.
Social	Grievance Redressal Mechanism	A transparent Grievance Redressal Mechanism in three levels shall be developed with designated priority level, scrutiny managers and committees to solve the grievances faced by stakeholders.
	Stakeholder engagement	ESMS does not have stakeholder engagement plan. The Company should develop the procedure to identify, engage, communicate, and track the engagement with its stakeholders.
Governance	Implementation of ESG Management System	An ESG management system will be developed to address and mitigate potential environmental, social, and governance challenges during construction and operation. An assigned governing body will oversee the implementation and ensure timely resolution of issues.

3.2 Compliance to Environment and Social Legal Requirements, IFC Performance Standards and ADB Safeguards

24. Method of Assessing Compliance: The status of compliance of the project with applicable E&S legal regulations is presented in the subsequent sub-sections. The method of reading the tables is as follows:

- The regulations and their applicable requirements are listed in the first and second columns, respectively.
- The compliance of projects with legal requirements has been indicated based on the legend given below.

C	Regulation and its requirement are applicable to the project. The project is COMPLIANT to the requirement.
PC	Regulation and its requirement are applicable to the project. The project is PARTIALLY COMPLIANT to the requirement.
NC	Regulation and its requirement are applicable to the project. The project is NON-COMPLIANT to the requirement.
NA	Regulation and its requirements are NOT APPLICABLE to the project.
No Info	INSUFFICIENT INFORMATION to assess the status of compliance/conformance.

3.2.1 Legal Requirements - Environmental

25. The Tables below analyses the status of the project with respect to multiple compliance requirements for the project. The tables lists the current observation of the project and its compliance status at the time of the assessment. Further, the tables also discusses the legal/compliance requirements of the project at the later stages of the project along with the authorities/departments responsible for implementation in the recommendation column of the tables.

Table 5: Legal Requirements-Environment

Legal Requirements - Environment							
S. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
1	Environmental Impact Assessment Notification 2006 and amendments thereof	Not Applicable. The proposed project encompasses 2024 m ² parcel land with a total built-up area of 673.05 m ² . The total built-up area of the project is less than 20,000 m ² , which is considered the threshold limit of built-up area to be eligible for environmental clearance.	Obtain Environmental Clearance (EC) under the EIA Notification 2006	Tamil Nadu Environmental Impact Assessment	Environmental clearance is not required for the proposed project as the total built-up area of the project is 673.05 m ² which is less than 20,000 m ² which is considered as the threshold limit of built-up area to be eligible for EC.	NA	None
			Submission of bi-annual compliance report post EC	Tamil Nadu Pollution Control Board	Not applicable as EC is not required for the proposed project.	NA	None
			Submission of environmental statement for the financial year ending the 31st of March in Form V to TNPCB on or before the thirteenth day of September every year (u/r 14)	Tamil Nadu Pollution Control Board	Not applicable as EC is not required for the proposed project.	NA	None

Legal Requirements - Environment							
S. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
2	Air Prevention and Control of Pollution Act, 1981 (Air Act) and Water Prevention and Control of Pollution Act, 1974 (Water Act)	Applicable. All potential pollution activities will require Consent to Establish from Pollution Control Board before commencing construction activity at the proposed project site.	Consent to Establish Certificate (CTE) u/s 21 of Air Act and u/s 25 of Water Act	Tamil Nadu Pollution Control Board	At present construction activity has not commenced at the project site. The developer is yet to apply for the CTE certificate.	NA	Contractor to ensure that no construction activity will be commenced at the project site without obtaining CTE from TNPCB.
			Comply with the conditions of CTE		Compliance to CTE conditions which includes but not limited to- treatment of domestic effluents (conditions under Water Act), diesel	NA	Contractor to comply with the CTE conditions during the construction phase of the project.
3	Air Prevention and Control of Pollution Act, 1981 and Water Prevention and Control of Pollution Act, 1974	Not Applicable to the present stage of the proposed project site.	Consent to Operate (CTO)		A CTO certificate is required to be obtained before commissioning of the proposed project. At present there is no construction activity ongoing at the project site. Hence, not applicable.	NA	Contractor to obtain CTO before commissioning the project.
4	Environmental Statement	Not Applicable to the present stage of the proposed project site	Submission of Environmental Statement for the financial year ending the 31 st of March in Form V to TNPCB on or before 30 th day of	Tamil Nadu Pollution Control Board	Will be applicable after the site obtains CTE	Construction and Operation Phase	None

Legal Requirements - Environment							
S. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
			September every year.				
5	Environment Protection Second Amendment Rules 2002 (DG set) & 2004	Not Applicable because the project is not utilizing DG sets for emergency power supply.	The stack height of the DG should be as per the regulations. DG set should be housed in an acoustic enclosure	Tamil Nadu Pollution Control Board	No construction activity is ongoing at the proposed project site. Based on the E&S site visit observations, the project site does not utilize DG sets for emergency power supply.	NA	Obtain permission from Electrical Inspectorate during construction and operation phase and comply with conditions as specified in CTO during the operation phase.
6	Noise Pollution (Regulation and Control) Rules, 2000	Not Applicable to the present stage of project operation.	No horn shall be used in silence zones or during nighttime (u/r 5A (1)) Sound emitting construction equipment shall not be used or operated during night-time in residential areas and in silence zones. (u/r 5A (2))	Tamil Nadu Pollution Control Board	No construction activity is ongoing at the proposed project site. Hence, not applicable	NA	Contractor to conduct ambient noise monitoring report. It is further recommended that the developer should take adequate measures to control noise levels and restrict to 55 dB(A) during daytime and 45dB(A) during nighttime which is the prescribed national noise

Legal Requirements - Environment							
S. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
							level standards for residential areas. for residential areas.
7	Gas Cylinder Rules, 2016	Not Applicable. The project site does not store gas.	Specifications for labelling (u/s 9) and storage (u/s 21) of gas cylinders (vertically in a cool dry, well-ventilated place under cover away from heat.	Petroleum and Explosives State Organization	There is no storage of gas cylinders at the project site.	NA	None
8	Hazardous wastes (Management, Handling and Transboundary Movement) Rules 2016	Not Applicable	Occupier shall be responsible for safe and environmentally sound management of Hazardous and other waste. u/r 4(2).	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no presence of 'hazardous waste' as defined under section 3(17)(i), (ii) and (iii) being generated/ handled/ stored/ Processed hazardous waste which should comply with the rules and obtain consent from TNPCB.	NA	None

Legal Requirements - Environment							
S. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
9	Construction and Demolition Waste Management Rules, 2016	Not applicable to the present stage of project operations.	Mode of disposal of C&D waste. u/r 4	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no construction activity ongoing at the proposed project site.	NA	Contractor to ensure proper storage and disposal of construction and demolition waste during the construction stage of the project.
10	Solid Waste Management Rules, 2016	Not applicable to the present stage of project operations	Every waste generator shall segregate and store the waste generated by them in three teams, namely, biodegradable, non-biodegradable and domestic hazardous wastes in suitable bins and handover segregated wastes to authorized waste pickers or waste collector as per the direction or notification by the local authorities from time to time.	Tamil Nadu Pollution Control Board	Based on the E&S site visit observations, there is no solid waste present at the proposed project site.	NA	Contractor to ensure the generated solid waste at the proposed project site and labour camp shall be stored and disposed as per municipal solid waste rules during the construction stage of the project.
11	E-Waste (Management) Rules, 2022	Not applicable to the present	Ensure e-waste generated by them is channelized through	Tamil Nadu Pollution Control Board	Based on the E&S site visit	NA	None

Legal Requirements - Environment							
S. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
		stage of the project operations	collection Centre or dealer of authorized producer or dismantler or recycler or through the designated take back service provider of the producer to authorized dismantler or recycler. u/r 9(1) Maintain records of E-Waste generated in Form-2. u/r 9(2)		observations, there is no e-waste present at the proposed project site.		
12	Central Ground Water Authority Guidelines to regulate and control Ground Water Extraction in India dated 1 June 2019 Groundwater (Development and Management) Act, 2009	Not Applicable to the present stage of the project operation.	Registration of existing borewells/NOC for new borewells.	Central Groundwater Authority	Based on the E&S site observations there are no borewells present at the proposed project site.	NA	Going forward in case borewell is to be developed, a prior approval to be obtained.
			Installation of digital water flow meter (confirming to BIS standard) in the abstraction structure (s)		Not applicable.	NA	

Legal Requirements - Environment							
S. No.	Regulation	Status	Legal Requirement	Authority Responsible	Observations	Compliance Status	Recommendation
13	Tree Cutting and Replantation NOC scheme	Requirement for tree cutting for construction works to commence at Project site.	Permission is required for cutting/transplanting trees coming in proposed construction of high-rise residential building	District Forest Officer (DFO), Tamil Nadu Forest Department	Based on the E&S site visit observations, there are no mature tree present at the proposed project site. Hence, not applicable.	NA	Relevant permission must be obtained before the trees are cut/transplanted.

3.2.2 Insurances

Table 6: Project Insurance

Project Insurances				
S. No.	Applicable Insurances	Observations	Compliances Status	Recommendations
1	General Insurance for the property	The general insurance of the project was not shared for review.	NA	Contractor to obtain general insurance for the property.
2	Contractor All Risk Policy	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	Contractor to obtain contractor all risk policy when construction activity commences at the project site.
3	Third Party Liability Policy	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	Contractor to obtain all risk insurance policy to cover the construction activities.
4	Environmental Liability insurance	At present there is no construction ongoing at the project site. Hence, not applicable to the present stage of project operation.	NA	None

3.2.3 Legal Requirements – Occupational Health & Safety

Table 7: Occupational Health and Safety

Legal Requirements – Occupational Health & Safety						
S. No.	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
1	The Building and Other Construction Workers ‘(Regulation of Employment and Conditions of Service) Central Rules, 1998	At present there is no construction work on-going at the project site. Hence, not applicable to the present stage of the project operations.	Registration of establishment	At present the proposed project is in the design stage. No construction activity has commenced, and laborers are not deployed at the project site. Hence not applicable.	NA	The contractor to comply with the legal requirements pertaining to Occupational Health & Safety when the construction activity commences at the project site.
			Hours of work, rest and weekly off (Chapter XXVI			
			Safe & Health- General Provisions (Chapter IV)- physical hazards, PPE, electrical hazards.			
			Provision of drinking water (u/s 32)			
			Provision of latrines and urinals (u/s 33)			
			Provision of accommodation (u/s 34)			
			Provision of creches (u/s 35)			
			First aid facilities (u/s 36)			
			Fire protection (u/r 35)			
			Emergency action plan			
			Stability of structures (u/s			
			Lifting appliances and gear (Chapter VII)-			

			testing, safe, load indicators, ropes			
			Reporting of accidents (u/r 237)			
			Medical examination of crane operators, exposure to special occupational hazard (u/r 250)			
			Safety Officer (u/s 38 & u/r 209)			
			Health and Safety Policy (u/r 39)			
2	Central Electricity Authority. (Measures relating to Safety and Electric Supply) Regulations, 2023.		General safety requirements for: <ul style="list-style-type: none"> • Electric Supply lines and apparatus safety • Cut-out • Earthed terminal • Dangerous notice • Flexible cables 			
			Fire buckets filled with clean dry sand and ready for immediate use for extinguishing fires, in addition to fire extinguishers suitable for dealing with electric fires shall be kept at site			

3	Gas Cylinder Rules 2016	Not applicable. No gas cylinders are present at the project site.	Specifications for labelling (u/s 9) and storage (u/s 21) of gas cylinders (vertically in a cool, dry, well-ventilated place under cover away from heat)	There is no gas cylinders present at the project site.	NA	None
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3.2.4 Legal Requirements – Labour & Working Conditions

Table 8: Labour and Working Conditions

Legal Requirements – Labour & Working Conditions						
S. No.	Applicable Regulation	Status	Legal Requirement	Observations	Compliance Status	Recommendations
1	Contract Labor (Regulation and Abolition) Act, 1970;	At present there is no construction work on-going at the project site. Hence, not applicable.	Registration of Establishment as principal employer (u/s 7)	At present there is no construction work on-going at the project site. There are no labour deployed at the project site. Hence, not applicable to the present stage of project operations.	NA	Recommend obtaining and complying once construction activities commence at the project site.
			Contractor's license for workers more than 50 (u/s 12)			
2	Minimum Wages Act, 1948		Payment of minimum wages as per latest circular. u/s 5&12			
3	Employee Compensation Act, 1923 and Amendment Act, 2009		Obtaining insurance policy for the same. u/s 4(2)			
4	Employees' Provident Funds (EPF) and Miscellaneous Provisions Act, 1952		Deduction of employee contribution and deposit of employee and			

	amended up to 1996's.		employer contribution with the authority. u/s 6			
5	Employees' State Insurance Act (ESI), 1948		Deduction of employee contribution and deposit of employee and employer contribution with the ESI Corporation. u/s 40(1)			
6	Equal Remuneration Act, 1976		Duty of employer to pay equal remuneration to men and women for same work or work of similar nature (u/s 5)			
7	Inter-State Migrant Workers Act 1979		a) Registration of establishment as principal employer (u/s 4)			
			b) Contractor's license for engaging migrant workers (u/s 8)			
			c) Payment of wages as per Minimum Wages Act (u/s13)			
			d) Displacement allowance equal to fifty percent of the monthly wages (u/s 14)			
			e) Journey allowance (to and from hometown payable by Contractor (u/s 15)			

8	Prevention of Sexual Harassment	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013	Receive complaints of sexual harassment (u/s 9) Conduct enquiry on receipt of complaint (u/s 11)	A POSH Policy has not been developed at the present stage.	NC	
9	Maternity Benefit	Maternity Benefit (Amendment) Act, 2017.	Maternity benefit leaves of 26 weeks (u/s 5(3))	maternity benefit policy is not available.	NA	Recommend contractor to formulate and implement a Maternity benefit policy when the Company has a workforce of more than 100 persons.
10	Child Labour	Child and Adolescent Labour (Prohibition & Regulation) Act, 1986 amended in 2016	Client will not employ children in any manner that is economically exploitative or is likely to be hazardous or to interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral, or social development	Child labour policy not available for review	Not available	The contractor to ensure that there is no child laborers present at the project site during the construction phase.

3.2.5 Assessment of IFC PS1

Table 9: IFC PS1

S. No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Policy	Applicable. The construction activities at the proposed project site give rise to environmental and/or social risks and impacts.	IFC PS1	Establishing E & S Policy which incorporates national laws	Environmental and social policy under Tamil Nadu Shelter Fund’s Environment and Social Management System (ESMS) is given.	Complied	Ensure applicability of the policy during the project execution.
				Policy to indicate competent professional to ensure conformance & execution of the Policy			
				Communication of the policy to all levels of organization			
2	Identification of risks & impacts	ESG risks have been identified in ESMS. EIA is not applicable as the project built-up area is less than the required threshold. IEE for the site has been conducted.		Conducting an environmental and social impact assessment. (ESIA or EIA) of the project, appropriate to the nature of the project’s environment and social risks	EIA/ESIA is not applicable. IEE has been conducted for the site.	Complied	None

3	Monitoring and review	Applicable. The construction activities at the proposed project site gives rise to environmental and/or social risks and impacts.		Establish procedures to monitor and measure the effectiveness of the management program	An environmental and social management system was not shared for review.	Compiled	The contractor/developer to establish procedures to monitor the effectiveness of the ESMS. The ESMS should be reviewed periodically by the senior management of the developer’s team.
				Senior management in the client organization will receive periodic performance reviews of the effectiveness of ESMS.	Information pertaining to review of ESMS by the senior management was shared for review.		
4	Emergency preparedness & response	Applicable. EPR will be necessary during the construction and operation phase.		<p>Establish and maintain emergency preparedness response system to respond to accidental and emergency situations associated with the project.</p> <p>-- identification of areas where accidents and emergency situations may occur</p> <p>-- impacted communities & individuals</p>	An emergency preparedness and response system were not shared for Review.	NC	Contractor to formulate emergency measures and procedures. The project site should identify any accidental areas and keep safety signages. All labors should be equipped with PPE kits, safety boots etc. Developer to ensure a Safety Engineer is deployed at the project site during the construction stage of the project.

				-- response procedure - of equipment & resource -- designation of responsibilities -- communication with potentially affected communities			
5	Stakeholder engagement	Stakeholder Engagement Plan is a part of ESMS.		Developing a stakeholder engagement plan	Available in ESMS	Compiled	-
6	External communication and grievance mechanism	It will be applicable during the construction and operation phase.		Implement and maintain procedures for external communications: -- receive and register external communication from public -- screen, assess & determine issues -- proven track & document responses	Contractor and Developer to ensure to comply with the mechanism available in ESMS for external communication and grievance handling.	Compiled	
7	Ongoing Reporting to Affected Communities	It will be applicable in case; project involves displacement of		Client to provide periodic reports to affected communities annually that describe the	The project does not identify any affected communities.	NA	None

		local communities		ongoing risk or impact on the affected communities			
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3.2.6 Assessment of IFC PS 2

Table 10: IFC PS 2

S. No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Human Resources Policies & Procedures	Applicable. The project employs laborers at site for construction works and entity level also there are employees.	IFC Performance Standard 2	a. Anti-bribery and Anticorruption b. Code of Ethics and Conduct c. Whistle Blowers Policy. d. Grievance Policy e. Prevention of Sexual Harassment Policy f. Equal Employment Opportunity g. Leave Policy	Policies as mentioned in ESMS are available and developer to ensure compliance with such policies during project execution.	Compiled	-

2	Working conditions and terms of employment			Communication of documented information regarding their rights under national labor and employment law		C	
				Workers right to form and join workers organization the client shall respecting collective bargaining agreements	Provision of collective bargaining agreement is not applicable for the current E & S due diligence assessment as it is not an industrial project.	NA	None
				Base the employment relationship on the principle on nondiscrimination and equal employment opportunity	The non-discrimination and equal employment opportunity policy are not applicable at the present stage.	NA	None
				Procedure for addressing collective dismissal/retranchmen t	Information pertaining to procedure for addressing collective dismissal/retranchmen t was not shared for review.	NA	None
				Client to ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner	Not applicable to the present stage.	NA	None

3	Protecting the Workforce	This will be applicable during the construction & operation phase.	Child and Adolescent Labour (Prohibition & Regulation) Act, 1986 amended in 2016	Client will not employ children in any manner that is economically exploitative or is likely to be hazardous or to interfere with the child’s education or be harmful to the child’s health or physical, mental, spiritual, moral, or social development	Not applicable to the present stage.	NA	None
4	Safe and Healthy Work Environment	Not applicable. The project is currently in the design stage.	World Bank Group General EHS Guidelines, 2007	Physical Hazards, collisions, slips, falls, general facility, design and operations, Integrity of Workplace structures, workspace & exit, fire precautions, lavatories and showers, portable water supply, clean eating area, lighting, safe access, first aid, air supply, work environment temperature	The project is currently in the design stage. Hence, not applicable	NA	None.
				Communication and training- toolbox talks	The project is currently in the design stage and no construction activity has commenced at the project site.	NA	None.

				Accidents & disease monitoring	At present no construction activity has commenced at the project site. Hence not applicable.	NA	None.
5.	Workers engaged by third parties		Contract Labour (Regulation and Abolition) Act, 1970	Registration of establishment as principal employer (u/s 7)	At present no construction activity has commenced at the project site. Hence not applicable.	NA	None
				Contractor’s license for workers more than 50 (u/12)			
6	Worker’s accommodation process and standards		IFC Guidelines on Workers accommodation : Guidance note by IFC and ERBD	Building construction materials, resistance to earthquakes (labour camps are always temporary in nature)	At present no construction activity has commenced at the project site. Hence not applicable. However, developer and contractor to ensure that worker’s camp are provided during the construction phase of the project.	NA	None
				Ventilation, slip resistant flooring			
				Fire extinguishers			
				Water and sanitary connection			
				Canteen, cooking, and laundry facilities			
				Separate toilets			
				Wastewater and solid waste segregation			

				First aid kit			
7	Primary supply chain	No supply chain has been hired so far.	IFC PS2	Monitor primary supply chain on an ongoing basis to identify new risks or incidents of child and or forced labour and life-threatening situations.	Not applicable to the present stage.	NA	None

3.2.7 Assessment of IFC PS 3

Table 11: IFC PS 3

S. No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1.	Resource Efficiency & Pollution Prevention:	Applicable. During the - construction operations of the project will consume resources (water, energy), reduce GHG emissions and will generates wastes (solid, c & d)	World Bank Group General EHS Guidelines (Part 1: Environmental) & IFC	a. Reducing project related GHG emissions	There is no construction activity going on at the project site. Not applicable to the present stage of project operations.	NA	As informed, project will apply for green building certification, thereby, it is recommended to design the building in a manner to reduce GHG emissions.
				b. Quantification of GHG emissions	There is no construction activity going on at the project site. Not applicable to the present stage of project operations.	NA	Going forward, recommend quantifying GHG emissions during the construction phase of the project.

				<p>c. Water conservation measures</p> <p>Storm/Rainwater harvesting - zero discharge design/use of treated wastewater to be included in project design operation water reuse</p>	<p>There is no construction activity going on at the project site. Not applicable to the present stage of project operations.</p>	NA	<p>Developer to ensure to adopt RWH techniques during the operation phase of the project.</p>
				<p>d. Energy conservation measures</p> <ul style="list-style-type: none"> • use of LED lighting • use low carbon fuels minimizing no. of boilers or heaters – • Planting trees as thermal shields around buildings 	<p>There is no construction activity going on at the project site. Not applicable to the present stage of project operations.</p>	NA	<p>Developer to ensure to adopt energy conservation measures during the operation phase of the project.</p>
2.	Air emissions and Ambient air quality & Wastewater and Ambient Water Quality		World Bank Group EHS Guidelines (Part 1: Environmental) Consent to Establish from TNPCB u/s 25 Water Act and u/s 21 of the Air Act	a. Consent to Establish from TNPCB	<p>At present the proposed project is in the design stage. Going forward it is recommended to obtain Consent to Establish before commencing construction activity at project site.</p>	NA	<p>Recommended to obtain the CTE before commencing construction work at site.</p>

				b. Comply with the conditions of consent to Establish	Not applicable to the present stage of project operations as it's greenfield.	NA	Recommended to get the certificate and comply with all the conditions of CTE
				c. Consent to operate from TNPCB	Not applicable at the present stage	NA	None.
				d. Comply with the conditions to operate	Not applicable at the present stage	NA	None.
3.	Solid Waste		World Bank Group EHS Guidelines (Part 1: Environmental) & Solid Waste Management Rules, 2016	Every waste generator shall segregate and store the waste generated by them in three streams, namely, bio-degradable, non-bio-degradable and domestic hazardous wastes in suitable bins and handover segregated wastes to authorized waste pickers or waste collector as per the direction or notification by the local authorities from time to time.	At present the project site is in the design stage. There is no construction activity on-going at the project site. Hence not applicable.	NA	Going forward the developer to implement solid waste rules during the construction and operational phase of the proposed project.
4.	Hazardous Waste		World Bank Group EHS Guidelines (Part 1: Environmental) Hazardous Wastes (Management, Handling and Transboundary	Occupier shall be responsible for safe and environmentally sound management of Hazardous and other waste. u/r 4(2)	At the present stage there are no hazardous wastes being generated at site.	NA	Has to be taken up later when hazardous wastes are collected at project site.

			Movement) Rules, 2016				
5.	Construction & Demolition waste		World Bank Group EHS Guidelines (Part 1: Environmental) Construction and Demolition Waste Management Rules, 2016	Mode of disposal of c & d waste. u/r 4	At present, the site is in the design stage. There is no construction or demolition waste being generated at the project site.	NA	Has to be disposed appropriately by the contractor when it is generated at the project site later.
6.	E-waste		World Bank Group EHS Guidelines (Part 1: Environmental) & E-Waste (Management) Rules, 2022	Ensure e-waste generated by them is channelized through collection center or dealer of authorized producer or dismantler or recycler or through the designated take back service provider to authorized dismantler or recycler. U/r 9(1) Maintain records of e-waste generated in Form 2. u/r 9(2)	At present there is no e-waste being generated at site	NA	None

7.	Noise Pollution		World Bank Group EHS Guidelines (Part 1: Environmental) & Noise Pollution (Regulation and Control) Rules, 2000	No horn shall be used in silence zones or during night-time in residential areas except during a public emergency Sound emitting construction equipment shall not be used or operated during night-time in residential areas and silence zones	At present the project is in the design stage.	NA	None
				Ambient noise monitoring	There is no DG present at site for emergency power supply	NA	None

3.2.8 Assessment of IFC PS4

Table 12: IFC PS 4

S. No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Water Availability	Applicable. Community health: The under-construction activities and the life cycle of the project may have detrimental effects on neighbors.	Central Groundwater Authority (Guidelines to regulate and control Groundwater extraction in India dated 1 June 2019, Groundwater (Depletion and	Registration of existing borewells/NOC for new borewells	There is no borewell present at the project site. Hence, not applicable.	NA	If site installs borewell, developer to ensure to obtain permission from TWAD.
				Installation of digital water flow meter (conforming to BIS standard) in the abstraction structure (s)	There is no borewell present at the project site. Hence, not applicable	NA	None

		Safety: Structural elements used in the construction activity are designed by competent professional and approved by competent authority. Security: The project site may retain direct or contracted workers to provide to safeguard its property	Management) Act, 2009 & World Bank EHS Guidelines (Part 3, Community Health & Safety)				
2.	Infrastructure and Equipment Design & Safety		IFC PS 4	Structural elements will be designed and constructed by competent professionals and certified or approved by competent authorities or professionals	At present there is no construction activity ongoing at the project site. Hence, not applicable.	NA	None
				For projects that operate moving equipment on public roads, the client will seek to avoid the occurrence of incidents and injuries to members of the public associated with the operation of such equipment.	At present there is no construction activity ongoing at the project site. Hence, not applicable.	NA	None
3.	Hazardous Materials and Management Safety			Exercise of special care where there is a potential for public (workers and their families to be exposed to hazardous materials and substances.	At present there is no presence of hazardous materials and substances.	NA	None
4.	Ecosystem Services			Developer to avoid degradation of natural resources that may result in adverse health and	The project location does not have detrimental effects on any	C	None

				safety risks and impacts to affected communities.	ecosystem services.		
5.	Community exposure to disease			Developer to minimize exposure to Covid 19 and other communicable diseases	Not applicable to the present stage of project operations.	NA	None.
6.	Emergency Preparedness and Response Systems			In addition, this aspect specified in IFC PS 1 Client to assist and collaborate with affected communities, local government agencies to respond effectively to emergency situations.	There are no communities affected at site.	NA	None.
7.	Life & Fire Safety		<ul style="list-style-type: none"> World Bank EHS guidelines: Community Health and Safety. National Building Code 2005/2016. Tamil Nadu Fire Prevention & Life 	Provision of firefighting infrastructure: portable fire extinguishers <ul style="list-style-type: none"> hose reel Down comer Yard hydrant alarm system automatic sprinkler system 	No construction activity has commenced at the project site. Not applicable to the present stage.	NA	None.
				Obtaining provisional Fire NOC at the time of obtaining commencement certificate from the Municipal Corporation	No construction activity has commenced at the project site.	NA	None

			<ul style="list-style-type: none"> Safety Measures Act, 2006 		Not applicable to the present stage.		
8.	Security Personnel		Private Securities Agency Regulation Act, 2005	<p>Client retaining direct or contracted workers to provide security to safeguard its personnel and property the following shall be the guiding principles:</p> <ul style="list-style-type: none"> -hiring -rules of conduct -training -equipping -monitoring of such workers 	There is no security guards present at the proposed project site. Hence not applicable	NA	None.

3.2.9 Assessment of IFC PS 5

Table 13: IFC PS 5

S. No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Land Acquisition & Involuntary resettlement	Not Applicable for the project	IFC PS 5	a. Avoidance or at least minimization of involuntary resettlement by exploring alternative project designs balancing environmental	The land is vacant and unused with no buildings in the vicinity. The project site does not have any economic activities, occupants (voluntary and involuntary) and hence	NA	None

					resettlement is not applicable.		
				b. Compensation and benefits for displaced persons if applicable	Not applicable.	NA	None
				c. Client will engage with affected communities through the process of stakeholder engagement described in PS 1	Not applicable.	NA	None
				d. The developer will establish a grievance mechanism consistent with PS 1 as early as possible in the project development phase	Not applicable.	NA	None
				e. Implementation of Resettlement Action Plan or Livelihood restoration Plan	Not applicable.	NA	None

3.2.10 Assessment of IFC PS 6

Table 14: IFC PS6

S. No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Biodiversity Conservation & Sustainable Management of Living Resources	Not Applicable for the project	IFC PS 6	a. Protection and conservation of biodiversity	The project site does not fall under modified habitats, natural habitat, and critical habitat	NA	None
				b. Management of eco-system services	The project is not likely to have adverse impacts on ecosystem services.	NA	None
				c. Sustainable Management of Living Natural Resources	The Client is not engaged in the production of living natural resources such as natural and plantation forestry, agriculture, animal husbandry, fisheries etc.	NA	None

3.2.11 Assessment of IFC PS 7

Table 15: IFC PS7

S. No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Indigenous people	Not Applicable for the project since no indigenous people are available	IFC PS 7	Client to avoid adverse impacts on indigenous people and wherever unavoidable, the client will minimize, restore and/or compensate for these impacts in a culturally appropriate	The project site does not identify any indigenous people likely to be affected by the project activities	NA	None

		near the site.		manner commensurate with the nature & scale of such impacts			
				The Client will undertake an engagement process with the Affected communities of Indigenous people as required in PS 1. The engagement process includes stakeholder analysis and engagement planning, information disclosure, consultation, and participation in a culturally appropriate manner	As there are no indigenous people identified hence, there is no need for an engagement process.		

3.2.12 Assessment of IFC PS 8

Table 16: IFC PS8

S. No.	Aspect	Reason for Application	Reference	E & S Requirement	Observations	Compliance Status	Recommendation
1	Cultural Heritage	Applicable for the project	IFC PS8 & The Ancient Monuments and Archaeological Sites and Remains (Amendment and	The project site should not cause adverse impacts to cultural heritage sites	No cultural heritage site identified in the vicinity or the study area	NA	None

			Validation) Act 2010				
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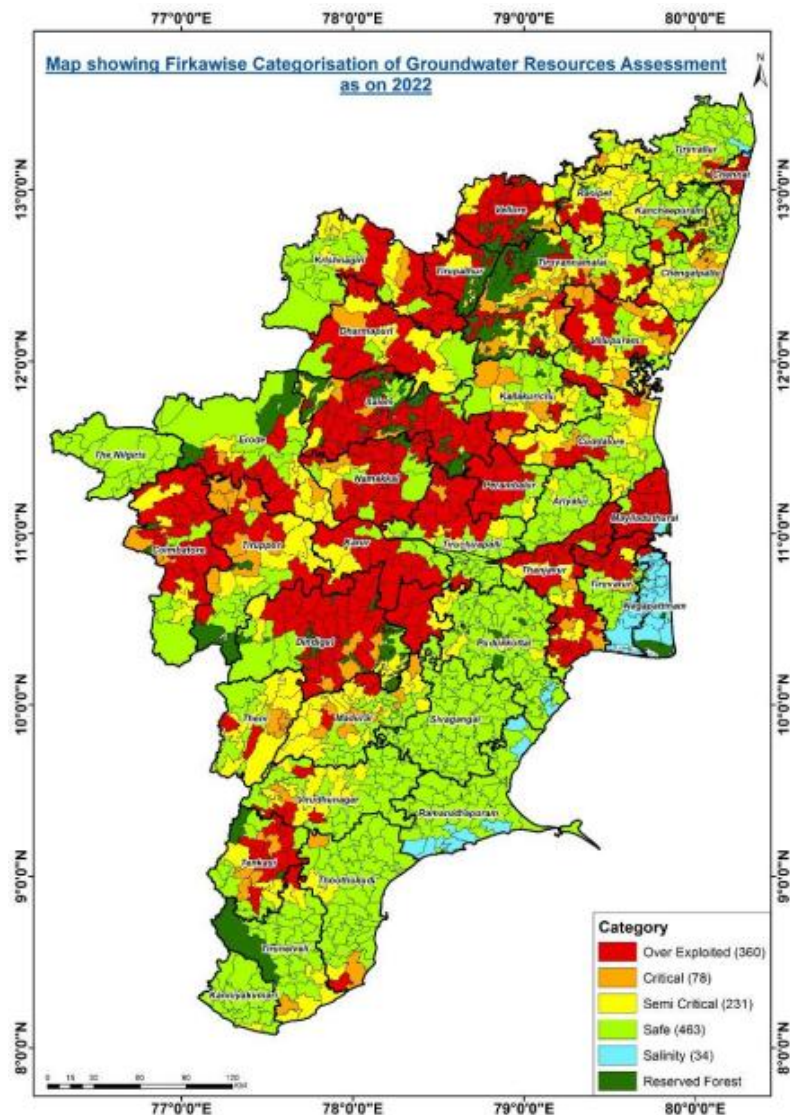
3.3 Compliance to ADB Safeguards - Key findings

26. This section classifies the risk to the project from environmental stress/climate change as well as the risk to the environment and climate change due to the project activities. The risk rating ‘LOW’, ‘MEDIUM’ and ‘HIGH’ is given to each of the aspects given below. Further, an overall risk is given to the project due to climate/environmental impacts.

3.3.1 Impact of Environmental Stress and Climate Change on Project

27. **Groundwater Status:** As per the Groundwater Exploitation Assessment Report by Central Ground Water Board (CGWB), the project site located in Kanjirangal Village, Sivagangai Taluk in Sivgangai District is classified as “Safe”. However requisite permission will be obtained for borewells, with appropriate rainwater harvesting and development of groundwater recharging systems. Therefore, the risk of the project for depleting groundwater level is classified as “Low”.

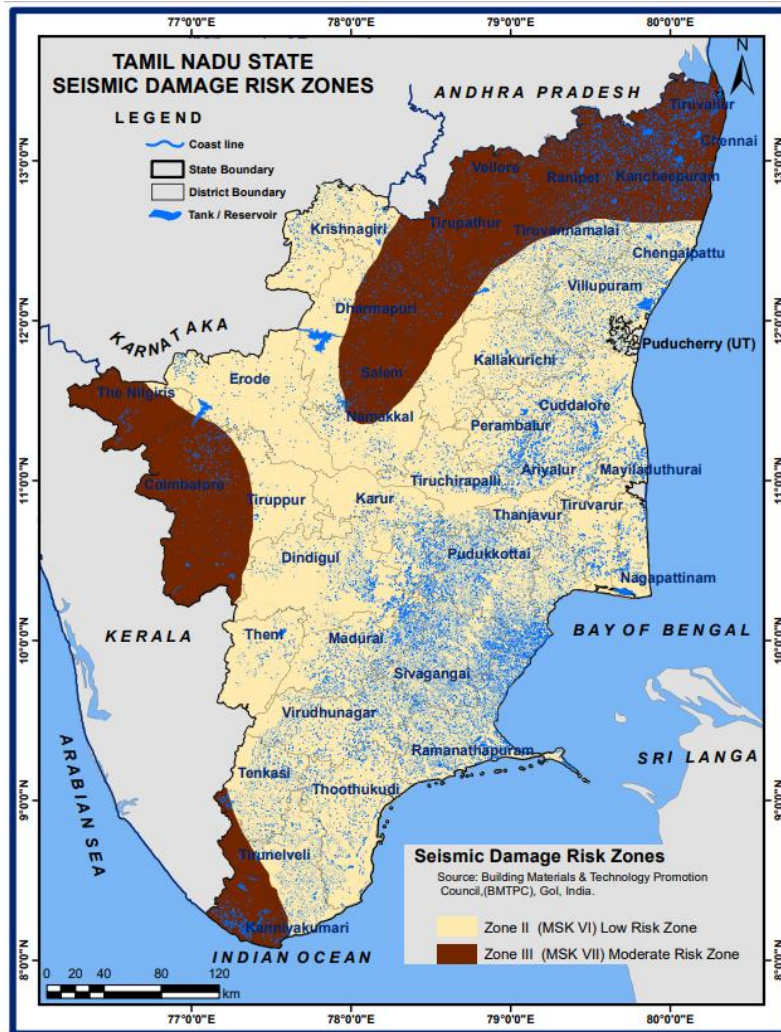
Figure 3: Categorization of Assessment unit (Firka), Tamil Nadu, 2022



28. **Susceptibility to natural catastrophes and climate-related emergencies:** Sivagangai District is prone to two kinds of disaster risks drought and occasionally floods.

- **Earthquake:** As per the seismic zoning map of India, Sivagangai district is in Seismic Zone II. This Zone is considered to have low to moderate risk of earthquakes. A disaster management plan has been prepared for Sivagangai District for the year 2023-24 by the District Disaster Management Authority (DDMA).

Figure 4: Seismic zone Map of Tamil Nadu



- **Flood:** Even though the district is landlocked, floods in the district are associated with cyclones with heavy rain and rainfall in the catchment area of Periyar and Vaigai dam. The district experienced heavy rainfall and flood in 2005 and 2011.
- **Cyclone:** The district has no coastline. Hence the chance of direct threat by cyclone is almost NIL, but due to heavy downpour on the formation of cyclone, flash floods are common in this district.
- **Landslide:** The project site has low risk to landslides as per BMPTC report. No additional mitigation measures need to be prepared.
- **Drought:** Low rainfall coupled with erratic behavior of the monsoon in the state makes the district most vulnerable to drought, which can have a devastating impact on the population, drought variability has a district and significant impact on food products

and overall economy. Sivagangai district is frequently prone to drought as it has no perennial river and water source.

29. The risk to the project from natural and climate related disasters is classified as **"Medium"**.

- **Critically Polluted area:** The project site is surrounded by barren land having minimal development. The project site is not located within 5km distance any notified polluted areas as per Central Pollution Control Board in the 'Comprehensive Environmental Assessment of Industrial Clusters', 2013. Thus, the risk to the project from the polluted area is low.
- **Presence of Municipal Dump site/Hazardous Waste Landfills:** The nearest dump site near to the project area is away from the site area approx. 10Km far from the site area. No hazardous waste landfill is present near to the site.

30. Thus, the risk of exposure to pollution from dump sites to the project is "Low" Source of Pollution around Project Location: None identified in the 5km vicinity.

31. The risk of exposure to pollution from the nearby industries to the project is **low**. Necessary mitigation measures will be taken as a part of EMP to be developed for construction phase.

3.3.2 Impact of Project on Environment and Climate Change

32. **Impact on Protected Areas:** The project area does not have designated Protected areas. Therefore, the risk from the project activities to the protected area is low.

33. **Impact on Water:** The project shall use groundwater for construction purposes. During the operational phase the project site shall be provided with septic tank and to be connected to corporation sewerage lines. The sludge shall be collected by Sivagangai Municipality in required interval in supervision of TNWWHCL. The developer to comply with the conditions for the wastewater management as specified in the Consent to Operate certificate for the proposed project site. Requisite permission will be obtained for borewells, with appropriate rainwater harvesting and development of groundwater recharging systems.

Therefore, the risk to the water resources from the current state of the project site is low.

34. **Impact on Air/GHG Emissions:** During construction and operational phase the project site shall utilize DG sets for emergency power supply of requisite capacity specified in CTE and CTO received for proposed project site. DG sets to be housed in an acoustic enclosure with sufficient height and ambient noise monitoring to be conducted regularly.

35. Therefore, the risk to the air resources from the current state of the project site is negligible.

36. The risk of the project activities on environment/climate change is classified as **'Medium.'** Necessary mitigation measures will be taken as a part of EMP to be developed for construction phase.

3.3.3 Social Impact Assessment

37. The section classifies the risk to the project from social aspects. The risk rating of 'LOW', 'MEDIUM' and 'HIGH' is given to each of the aspects given below. Further, an overall risk is given to the project due to social impacts.

38. **Land ownership and Transfer details:** The Department of Social Welfare and Women's Rights, Sivagangai has formally petitioned to the District Collector to secure permission for formal transfer of the land to Tamil Nadu’s Social Welfare and Women Empowerment (SW&WE) Department for the construction of a new Government Ladies Hostel on the subject site from the Revenue Department that measures an area of 2,024 m². Once the land is transferred to the SW&WE department, the land will be leased to TNWWHCL for a period of 28 years. The lease documents will be included in the updated ESG DD once it is registered. The site also does not have presence of indigenous people and is also not traditional land of any indigenous people. As per the census data of 2011¹, 28 scheduled tribe people (0.07% of the total population) have been identified in Sivagangai municipality in total. The land parcel has been historically with the various government departments and was not occupied by indigenous people. Additionally, the district does not have any scheduled areas as well. The land belongs to the government and does not have any legacy issues or ownership disputes. The project is not anticipated to have any direct or indirect impacts on the dignity, human rights, livelihood systems or territories, or natural or cultural resources that are used, owned, occupied, or claimed by indigenous peoples or their ancestral domain or assets. Additionally, the project does not have any Involuntary Resettlement (IR) impacts. The project site also does not have cattle rearing or cattle grazing in the project site. Hence, the project has been categorized as Category C for both Involuntary Resettlement and Indigenous People as confirmed in the Involuntary Resettlement (IR) and Indigenous Population (IP) checklist documented in Annexure 3 and 4. The land ownership details will be updated in the ESG DD once it is registered.

39. The proposed project site is categorized as B2 under EIA notification 2006 and no public consultations are required to be undertaken, however stakeholder engagement has been conducted, the details of which are documented as Annexure 6. The social safeguards risk of the project including Cultural, Heritage and Religious site is classified as LOW.

3.3.4 Stakeholder Engagement

40. The project shall have a stakeholder engagement strategy which will encompass a wide range of stakeholders, including both those within the organization (internal stakeholders) and those external ones. Additionally, the strategy will ensure that it incorporates the participation of community stakeholders who are relevant to the project. During the stakeholder consultation, various aspects of the project were discussed, including a comprehensive understanding of its scope, potential benefits, and disadvantages. The stakeholders engaged during the consultation comprised residents from the project site area of the public residing in the vicinity of the proposed Working Women’s Hostel site. The land around the project site is vacant and no residential/commercial complexes are found in the immediate vicinity. Key concerns such as air and water pollution, environmental impact, and safety of the project site were addressed. Discussions also covered issues related to waste management, ensuring that proper disposal and mitigation measures would be implemented. Additionally, the availability and efficiency of transportation modes for residents were reviewed to assess accessibility and convenience. Feedback from stakeholders was considered to ensure that the project aligns with community needs and minimizes adverse impacts.

¹ <https://www.censusindia.co.in/towns/sivaganga-population-sivaganga-tamil-nadu-803736>

- **Grievance mechanism for workers:** A grievance redressal policy shall be established for the project prior to construction that will apply at three levels: the project site, the overall project, and the company. At the project site, structures will be displayed outside the project site for the general public to raise grievances at any given point of time. The report provides a comprehensive description of the Project Grievance Redressal Mechanism (GRM) in Section 5.
- **Provision of welfare facilities for workers:** Construction hasn’t commenced, and the contractor to undertake the project has not been chosen. It was expected that the selected contractor would be required to develop an Environmental, Health, and Safety (EHS) Plan, which would undergo approval by the company. This plan will encompass the provision of welfare facilities for the workers.
- **Prevention of child/forced labor:** At present no construction has commenced at the project site. Based on the E&S site visit observations there are no child laborers present at the project site. It is expected that the contractor appointed for the construction must comply with the child labor (Prohibition and Regulation Act 2016) during the construction phase of the project.
- **Practices on Anti-Bribery and Anti-Corruption:** An anti-bribery and anti-corruption policy was not shared for review. It is expected that the company must adopt a policy on anti-bribery and anti-corruption which shall be communicated to TNWWHCL.

41. An overall risk given to the project due to social impacts is “**Medium**” given the fact the GRM is yet to be established.

4. Environment and Social Action Plan

4.1 Methodology of Action Plan

42. Going forward, E&S compliances to be addressed by both Company and Project level. Environmental and Social Action Plan (ESAP) is a tool to ensure that any outstanding issues at the time of the operation approval are addressed in a timely and appropriate manner, and to ensure continued compliance with environmental and social compliance requirements, as well as local legal requirements. Following key elements to be included in action plan:

- Issue & action
- Objective
- Completion timeline
- Responsible person to complete the task
- Monitoring Mechanism

4.2 Prioritization of Actions

43. The actions to be undertaken to establish compliance with legal requirements and industry best practices have been provided in the subsequent sub-sections. The actions will be classified as follows to enable prioritization and planning of human and financial resources.

High	The ‘High’ priority actions demand urgent attention. These actions if not implemented could lead to legal liabilities or emergency situations. These actions should be implemented at the earliest. These are mostly related to absence of consent/ permit/ approval from regulatory authorities that pose a threat to business continuity.
Medium	The ‘Medium’ priority actions are those which are management program oriented. This also covers such actions, which if not implemented, can lead to potential legal liabilities. These actions would need time to create a systemic approach.
Low	The ‘Low’ priority actions are those which are management program oriented. The actions are more practice oriented.

Table 17: Environment and Social Action Plan

S. No.	Aspect	Recommendation	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget
Legal Requirements- Environment							
1	Consent to Establish	Not applicable during the pre-construction phase.	Developer	Before commencing		Copy of CTE	-
2.	Ground Water NOC (in case ground water is used)	Not applicable during the pre-construction phase.	Developer	Before Commencing		Copy of NOC	
3.	Permission from DFO, Forest Department	Not applicable during the pre-construction phase.	Developer	Before Commencing		Copy of Permission Letter	
Project Insurances							
1	Insurances	General Insurance of the project not shared for review	Developer	3 months	High	To be obtained	-
Assessment of IFC PS 1- Identification of Environmental & Social Risks and Impacts							
1	Emergency Preparedness Response Plan	It is suggested to develop emergency preparedness response plan which will be part of ESMS and shall be adopted at site during construction and operation phase.	Developer	3 months	Medium	To be developed	-
Compliance to ADB Safeguards							
1	Presence of municipal drainage	It is suggested that drainage causing mosquito problems, and a strong, unpleasant smell should be treated in regular interval to mitigate	Developer	6 months	Medium	To be ensured by the contractor and the developer.	NA

		possibility of mosquito breeding					
2	Impact of Environmental Stress and Climate Change on Project	It is suggested that the developer should adopt adequate measures during the construction and operation phase of the project to combat effect of natural hazards prone to the site such as cyclone, flood, thunderstorm	Developer	3 months	High	To be ensured by the contractor and the developer	NA-

5. Grievance Redressal Mechanism

44. A Grievance Redress Mechanism for all the stakeholders will be established and activated to address matters related to environmental and social aspects of the project before construction commences. 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.

45. 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.

46. At the project level, a nodal person 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 nodal person will inform the project director and guide him 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.

1. The project team will regularly examine the grievance resolution process, including the record of grievances received and their resolutions.
2. The Grievance Redressal Mechanism (GRM) will be designed in accordance with the grievance redressal approach of the World Bank and ADB for projects.
3. Procedure - The GRM addresses three groups of stakeholders: external stakeholders at the project site, those impacted by the project, and the Fund's investors.

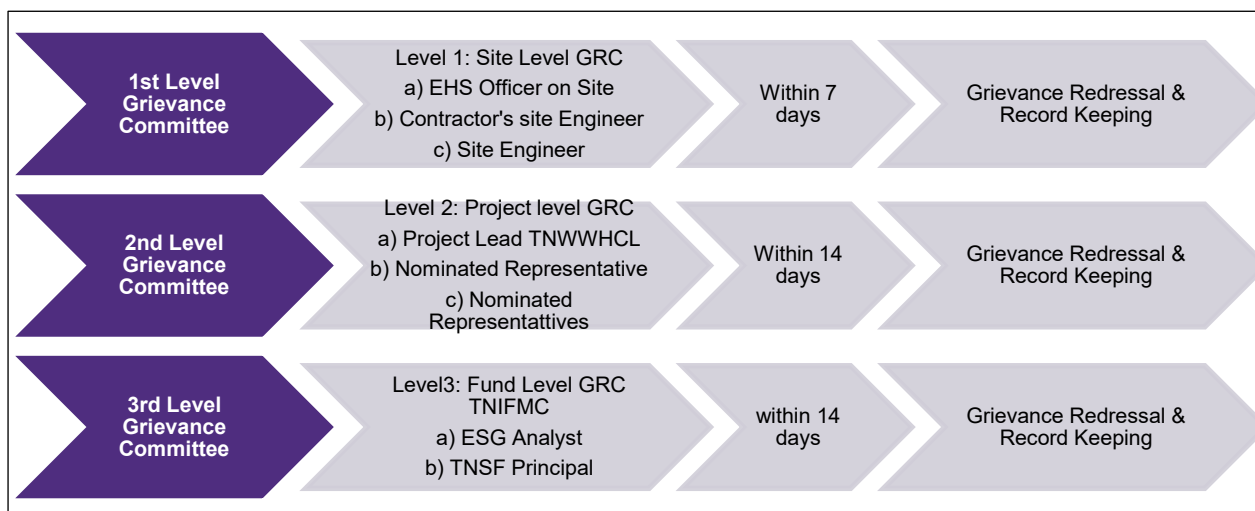


Figure 5: Levels of grievance Redressal Mechanism

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

Officer

- The contractor, in consultation with the Project Lead and TNSF’s ESG team, will appoint a Site Level Grievance Redressal Officer. The site-level GRO, ESG Analyst, and Project Lead will conduct a rapid assessment of contentious issues/disputes related to the project, such as land ownership/rights, ethnic/community rights, or labor matters, and the relevant stakeholders. This assessment will rely on existing information from the project, government departments, and the local community.
- The assessment will identify key stakeholders involved in these issues and the nature of the disputes (informed, polarized, etc.). Special attention will be given to the local dispute resolution culture and the ability and track record of stakeholders to resolve disputes through mediation or constructive negotiation. The Management, in consultation with the Project Lead and TNSF, will appoint a Management Level Grievance Redressal Officer.
- The names, titles, contact numbers, and email addresses of the Site Level, Management Level, and Fund Level GROs will be prominently displayed in both the local language and English at the project site’s entrance.

Step 2: Receipt of grievances and complaints.

- Grievances can be submitted through various channels, including phone, mail/courier, SMS, website, or in-person meetings. These channels will be made known and promoted on the project site.
- A Grievance Register (GR) will be kept at the Project Site Office to document grievances. If an aggrieved party communicates their grievance verbally, the Site Level Grievance Redressal Officer will make a record of the grievance/complaint.
- It is crucial that all complaints are documented in writing and stored in a database. The Site Level Grievance Redressal Officer will maintain a central log of all grievances received through the mentioned channels, using an Excel file.
- Staff members who receive verbal complaints should transcribe them into the central grievance log to enable tracking.

- e. Any grievances received anonymously should also be included in the grievance log.
- f. Each received grievance will be assigned a unique grievance number, and the Site Level Grievance Redressal Officer will acknowledge its receipt within 24 hours. This acknowledgment will be communicated to the aggrieved party either verbally or in writing, along with an estimated timeframe for providing additional information.
- g. The Site Level Grievance Redressal Officer will keep a record of these acknowledgment communications in the central grievance log.

Step 3: Resolving Grievances and Complaints

- a. The Site Level Grievance Redressal Officer will categorize grievances as high, medium, or low priority based on the nature of the issue raised (e.g., physical, and economic displacement, grievances from indigenous communities, inconvenience due to vehicular activities, accidents, near-misses, pollution, etc.), and the project’s impact on the environment and the aggrieved party.
- b. High priority grievances may involve issues with long-lasting effects beyond the project’s duration, while medium priority grievances have a moderate impact that can be reversed with corrective actions. Low priority grievances are short-term and can be resolved with minimal or minor adjustments.
- c. Using this categorization and assessing the seriousness of the issue, the Site Level Grievance Redressal Officer will prioritize complaints for appropriate follow-up actions.
- d. The Site GRO will review the received grievances/complaints and direct them to the relevant department for necessary action, keeping the project site head or in-charge informed.
- e. It is expected that most issues raised will be informational feedback requiring minor course corrections, generally handled by the project owner’s representatives on-site.
- f. Governance-related issues will be addressed at the management level, involving the Management Level Grievance Redressal Officer.
- g. The relevant department will respond to the Site GRO within seven days of receiving the complaint, including any necessary actions, with approval from the site head.
- h. If the Site Level GRO cannot resolve the grievance, it will be escalated to the Management Level GRO, with a total resolution time not exceeding seven days (including both site and management levels).
- i. If after seven days, there are still unresolved issues, the complaint will be forwarded to the Fund-Level Grievance Redressal Committee for resolution within the next seven days.
- j. The Site Level GRO is responsible for timely closing all grievances received from external stakeholders at the project site and those affected by the project.
- k. The Site Level GRO will inform the aggrieved party of the response and actions taken, obtaining their acknowledgment.
- l. Based on the acknowledgment from the aggrieved party, the Site Level GRO will close the complaint in the grievance log.
- m. The Site Level GRO will share the grievance log with the Management Level GRO and Project Lead of TNSF on a 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, Management Level GRO, and Fund Level Grievance Redressal Committee, will ensure that all grievances are closed within the quarter.

- p. The site will maintain, at a minimum, a database containing the following metrics:
 - Number of complaints received.
 - Number of complaints resolved.
 - Details of complaints that underwent mediation (through arbitration or involvement of other parties like community representatives, legal representatives, TNSF legal counsel, etc.).
 - Grievances and complaints received from investors.
 - Names of Grievance Committee Members at Project and Site Level.

47. The grievance resolution process, along with the log of grievances received and their resolutions provided will be periodically reviewed by the project team. The Grievance Redressal Mechanism (GRM) shall be aligned to the World Bank and ADB’s approach to grievance redressal in projects. 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 Management in consultation with Project Lead and TNSF.
- d. The names, positions/designations, contact numbers and email of the site Level, Management 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 of the following means: phone, post/courier, SMS, webpage, or face-to face. The uptake channels should be publicized and advertised at the site.
- 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 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 most 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 the project owner.
- f. Issues having to do with governance will be addressed at the Management level, with the involvement of the Management Level 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 Management Level GRO and the total time to resolve should not more than 7 days (including site Level and Management 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 the project site.
- k. The Site Level GRO will communicate the response and action taken to the aggrieved party and obtain their acknowledgement.
- l. Based on 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 Management 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, Management 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:
 - Number of complaints received.
 - Number of complaints resolved.
 - 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.)
 - Grievance and complaints received from investors.
 - The names displaying the Grievance Committee Members at Project and Site Level
48. The sample grievance redressal form is provided under Annexure 4.

6. Conclusion and Way Forward

49. Based on the thorough examination conducted for the project, which involved visiting the project site, no significant ESG (Environmental, Social, and Governance) concerns were identified regarding the proposed project. Overall, 6 ESG issues were evaluated using ESG risk rating tool of which 4 are considered as location and design, 2 for maintenance and materials. Hence, it is a **medium risk level**.

Key findings of the study are:

- The due diligence confirms that the land belongs to Revenue Department of Tamil Nadu, and not under any productive use by any individual, community or institution. Land ownership documents will be procured and provided in the updated ESGDD report/social safeguards monitoring report/s. No involuntary land acquisition is involved for the proposed project site and there are no known disputes or claims related to settlements or displacements. The project's land documents are not available currently and it shall be updated ESGDD or next SSMR, as per the availability.
- The project is expected to have no direct or indirect effects on the dignity, human rights, livelihoods, territories, or the natural and cultural resources associated with indigenous peoples or their ancestral domains and assets.
- The proposed project site is devoid of any human residences, trees, or other structures, meaning that there will be no need for displacement or demolition of houses or buildings because of the construction activities.
- No potential negative impacts have been identified for this project.

Way Forward

- The document/s related to (i) land ownership (ii) land transfer and (iii) lease to TNWWHCL; will be provided in the updated ESGDD report/social safeguards monitoring report/s.
- Training of project staff on the key points of the Environmental and Social Action plan by the project developer.
- Obtaining all the necessary compliances listed as specified in the document.
- The project needs to have a comprehensive emergency preparedness response plan.
- Further, the land ownership record/document is under process and will be updated. The land will then be leased to TNWWHCL by the end of May 2025 and the civil work for the project will only start post the land transfer around May 2025. The ownership record/document will be updated in the due diligence report /SSMR once the land documents become available.
- The project needs to establish and activate the Grievance Redress Committee for prompt response to public complaints, prior to the start of construction.
- The project needs to have a comprehensive stakeholder engagement plan and maintain a relationship with the target audience (Refer Chapter 9) and management plan for smooth disclosure and sharing of information.
- As a first step, a stakeholder analysis needs to be conducted (Refer Annexure 6). The stakeholder communities likely to benefit are students or youth in nearby educational institutions, concerned departments, businesses and traders' associations that may benefit from the development, community-based organizations and other civil society organizations, etc. need to be identified. Next, the project needs to conduct a formal and organized stakeholder consultation with 7 days of notice and submit the

findings/summary of the consultation in the next social safeguards monitoring report (SSMR). Such consultations will continue as per the stakeholder engagement plan and will be reported in the subsequent SSMRs.

7. Annexures

7.1 Annexure 1: Site Photographs

Photo No. 1	Date-27.11.2024	Client Name: TNWWHCL
		
Site Location: 9.869453662 N, 78.49381923 E		Description: Main Road Connecting to the site

Photo No. 2	Date- 27.11.2024	Client name: TNWWHCL
		
Site Location: 9.869453662 N, 78.49381923E		Description: Site Inspection with other stakeholders

Photo No. 2	Date- 27.11.2024	Client name: TNWWHCL
		
Site Location: 9.869453662 N, 78.49381923 E		Description: Adjacent buildings to the site

7.2 Annexure 2: Involuntary Resettlement Impact Screening Checklist

1. Introduction

Each subsection/section needs to be screened for any involuntary resettlement impacts which will occur or have already occurred. This screening determines the necessary action to be taken by the project team.

2. Information on subsection/section

- District/administrative name: Sivagangai Taluk, Sivagangai District
- Location (km): Kanjirangal Village, 3 km from Sivagangai city.
- Civil work dates (proposed): - _____
- Technical description: The proposed project involves the construction of a Working Women’s hostel. .

3. 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?		√		Land acquisition is not envisaged. The land is vacant, not used for any productive purpose by any individual or community and presently under the Revenue Department of Tamil Nadu. The process of land transfer from revenue to the SW&WE department is ongoing. Post land transfer to SW&WE department, the land will be leased to TNWWHCL for a period of 28 years.
2. Is the site for land acquisition known?				Not applicable since there is no land acquisition.
3. Is the ownership status and current usage of land to be acquired known?				Not applicable, as no land acquisition is involved.
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?				Not applicable.
6. Will there be loss of agricultural and other productive assets due to land acquisition?				Not applicable, as there will be no land acquisition. The land parcel 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?				Not applicable, as there will be no land acquisition. The site is filled with wild growth

				of weeds and shrubs and there are no trees in the site. The shrubs and wild vegetation will be cleared prior to construction.
8. Will there be loss of businesses or enterprises due to land acquisition?				Not applicable.
9. Will there be loss of income sources and means of livelihoods due to land acquisition?				Not applicable.
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?		√		
12. 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? [√] N/A If yes, approximately how many? Not applicable				<input type="checkbox"/> No <input type="checkbox"/> Yes
Are any of them poor, female-heads of households, or vulnerable to poverty risks? [√] N/A Not applicable				<input type="checkbox"/> No <input type="checkbox"/> Yes
Are any displaced persons from indigenous or ethnic minority groups? [√] N/A Not Applicable				<input type="checkbox"/> No <input type="checkbox"/> Yes

7.3 Annexure 3: Indigenous People Impact Screening Checklist

7.3.1 Introduction

Each project/subproject/component needs to be screened for any indigenous people impacts which will occur or have already occurred. This screening determines the necessary action to be taken by the project team.

Information on project/subproject/component:

- District/administrative name: Sivaganga Taluk, Sivaganga District
- Technical description: The projects involve the construction of a Working Women’s hostel.
- Screening Questions for Indigenous People Impact

KEY CONCERNS (Please provide elaborations in the “Remarks” column)	YES	NO	NOT KNOWN	Remarks
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 vacant and uninhabited. There are no buildings in the vicinity. The project is not anticipated to have any direct or indirect impacts on the dignity, human rights, livelihood systems or territories or natural or cultural resources that are used, owned, occupied, or claimed by indigenous people as their ancestral domain or assets. According to the census data of 2011 ⁴ , there are only 28 tribal people in Sivagangai district and the site visit analysis corroborates that no indigenous people are present in the site and upon interaction with the SW&WE department, it was said that historically the land wasn’t occupied by any indigenous people communities.
2. Are there national or local laws or policies as well as anthropological research/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?				Not applicable.
3. Do such groups self-identify as being part of a distinct social and cultural group?				Not applicable.

⁴ <https://www.censusindia.co.in/towns/sivaganga-population-sivaganga-tamil-nadu-803736>

4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?				Not applicable
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?				Not applicable.
6. Do such groups speak a distinct language or dialect?				Not applicable.
7. Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?				Not applicable.
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?				Not applicable.
Identification of Potential Impacts				
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?		√		
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.

7.4 Annexure 4: Sample Grievance Registration Form

(To be made available in Local Language- Tamil)

The Project welcomes complaints, suggestions, queries, and comments regarding program implementation. We encourage people with a grievance to provide their name and contact information to enable us to get in touch with you for clarification and feedback.

In case you want to include your personal details but want information to remain confidential, please type CONFIDENTIAL above your name.

Date	Place of registration	
Contact Information/Personal Details		
Name	Gender	Age
Home Address		
Village/ Town		
District		
Phone no		
Email		
Complaint/Suggestion/Comment/Question please provide the details (who, what, where and how) of your grievance below is if included as an attachment/ note/ letter, please mention here:		
How do you want us to reach you for feedback on your comment/grievance?		

For Official Use only

Registered by: (Name of Official registering grievance)			
Verified through	Letter	E-mail	Verbal/Telephonic
Reviewed by: (Name/Position of Official(s) reviewing grievance)			
Action taken:			
Whether Action Taken Disclosed:			
Means of Disclosure			

Sample Grievance Registration Form in Tamil

தேதி	பதிவு செய்யப்பட்ட இடம்	
தொடர்பு தகவல்		
பெயர்	பாலினம்	வயது
வீட்டு முகவரி		
கிராமம் / நகரம்		
மாவட்டம்		
தொலைபேசி எண்		
மின்னஞ்சல் முகவரி		
<p>புகார் / பரிந்துரை / கருத்து / கேள்வி</p> <p>தயவுசெய்து உங்கள் புகாரின் விவரங்களை (யார், என்ன, எங்கு, எப்படி) கீழே குறிப்பிடவும். இது இணைப்பாக / குறிப்பு / கடிதமாக இணைக்கப்பட்டிருந்தால், தயவுசெய்து இங்கே குறிப்பிடவும்:</p> <p>உங்கள் கருத்து / புகாருக்கான பதிலை எவ்வாறு பெற விரும்புகிறீர்கள்?</p>		

அதிகாரப்பூர்வ பயன்பாட்டிற்கு மட்டும்

பதிவு	செய்த	அதிகாரியின்	பெயர்:
சரிபார்க்கப்பட்ட விதம்: <input type="checkbox"/> கடிதம் <input type="checkbox"/> மின்னஞ்சல் <input type="checkbox"/> வாய்மொழி / தொலைபேசி			
மதிப்பாய்வு செய்தவர் (அதிகாரியின் பெயர் / பதவி):			
எடுக்கப்பட்ட நடவடிக்கை:			
நடவடிக்கை பகிரப்பட்டதா?			
பகிர்வதற்கான முறை:			

7.5 Annexure 5: Informal Consultation / Stakeholder Consultation

	
Name: Mr. Nagraj N, (local Stakeholder)	Name: Mr. Prapat M, (local Stakeholder)

Table 18: Stakeholder consultation summary

Consultation Summary							
S. No.	Date / Time / Venue of Meetings	Stakeholders	No. of Participants			Issues discussed	Project responses
			Male	Female	Total		
1	27.11.2024 Project site	Name Nagraj N, Prapat M, (local Residents)	2	0	2	Potential of any positive or adverse impact on his livelihood due to the construction of Working Women’s hostel	They expressed their interest in the project and raised no objections. They also felt that new development will provide additional income and job opportunities.

The local stakeholders in Sivagangai were not aware of Environmental, Social, and Governance (ESG) considerations. They recognized the project's potential to create jobs and economic benefit to the local community, as well as a great opportunity to provide a safe shelter for working women within the town limit. The stakeholders were found supportive with no objection with respect to environmental, social and governance concerns.

7.6 Annexure 6: Stakeholder Engagement Plan

A. Overview

1. The active participation of stakeholder's engagement plan in all stages of project preparation and implementation is essential for successful implementation of the project. It ensures that the subprojects are designed, constructed, and operated with utmost consideration to local needs, ensures community acceptance, and will bring maximum benefits to the people. Public consultation and information disclosure. Stakeholder engagement has to be conducted semiannually with various stakeholders including contractors, PMC, TNWWHCL and community

B. What is stakeholder engagement analysis

- Stakeholder analysis refers to endeavors to identify, understand, and prioritize the various parties involved in a project.
- In a nutshell, stakeholder analysis is a systematic process of mapping out the key individuals, groups, or organizations who have a vested interest in a project, assessing their needs and expectations, and determining the best strategies for managing relationships and communication with them.
- In project management, stakeholder analysis and management are critical as the landscape is often fast paced, highly competitive, and involves diverse interests. Engaging with stakeholders in a thoughtful way enables you to gain valuable insights and feedback to shape your product, build a strong ecosystem around it, and, ultimately, deliver a successful, high-impact product that meets the needs of all parties involved.

C. How to conduct a stakeholder Analysis

- The number and range of people involved in successful completion and operation of the project will vary depending on organization's unique goals and requirements, but the general steps involved in conducting a stakeholder analysis are as follows:
- Identify stakeholders — List all potential stakeholders, including community, Contractor, PMC, TNWWHCL, TNIFMC, Municipality, NGO.
- Prioritize stakeholder needs and expectations — Assess the impact of each stakeholder on the product, as well as their level of influence over its success. Consider factors such as their potential contribution, their ability to affect the outcome, and their importance in achieving project goals.
- Analyze stakeholder relationships — Understand the relationships between different stakeholders and identify any potential conflicts or synergies. This can help in developing strategies to manage their expectations and foster collaboration.
- Develop communication and engagement strategies — Based on the priorities and relationships identified, create tailored communication and engagement plans for each stakeholder group. This includes determining the most appropriate channels, frequency, and type of interaction.
- Monitor and adjust — Regularly review and update the stakeholder analysis, as relationships, priorities, and project requirements may change over time. Adapt communication and engagement strategies accordingly to maintain strong relationships.

D. Managing stakeholder relationship post analysis

2. Once you have conducted a comprehensive stakeholder analysis, it's important to keep the momentum going and continue to manage stakeholder relationships effectively

throughout the project development process. Stakeholder engaging meetings has to be conducted semiannually with various stakeholders including contractors, PMC, TNWWHCL and community etc.

3. Here are some additional steps to follow you've conducted to stakeholder analysis:
 - **Document stakeholder information** — Maintain a detailed record of stakeholder information, including their roles, responsibilities, and contact details. This documentation will be helpful in keeping track of communications and ensuring that all relevant parties are informed and engaged.
 - **Establish clear communication channels** — Ensure that all stakeholders are aware of the communication channels being used and the expected response times. This will help in streamlining communication and reducing potential misunderstandings or delays.
 - **Involve stakeholders in decision-making** — Engage stakeholders in the decision-making process, especially when their input or expertise is crucial. This not only strengthens relationships but also improves the overall quality of the product by incorporating diverse perspectives.
 - **Measure and evaluate stakeholder satisfaction** — Regularly assess stakeholder satisfaction to identify areas for improvement and address any concerns. This can be done through surveys, interviews, or informal feedback sessions.
 - **Recognize and celebrate success** — Acknowledge the contributions of stakeholders and celebrate the successful completion of milestones or project phases. This fosters a positive atmosphere and encourages stakeholders to continue supporting the product.
4. By diligently following these steps and continually managing stakeholder relationships, product managers can ensure that they are working effectively with all stakeholders, ultimately leading to the successful development and the product.