

Due Diligence Report

PUBLIC

Document Stage: Draft
Project No: 53067-004
May 2025

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

Proposed Working Women's Hostel in
Tiruvannamalai

Prepared by Tamil Nadu Infrastructure Fund Management Corporation (TNIFMC) for the Asian Development Bank (ADB).

ABBREVIATIONS

ADB	Asian Development Bank
AMC	Asset Management Company
CMDA	Chennai Metropolitan Development Authority
CRZ	Coastal Regulation Zone
CTE	Consent to Establish
CTO	Consent to Operate
DSW	Department of Social Welfare
DFR	Detailed Feasibility Report
EMP	Environment Management Plan
EWS	Economically Weaker Section
ESG	Environment, Social and Governance
ESGMS	Environment, Social and Governance Management System
GoTN	Government of Tamil Nadu
GRM	Grievance Redressal Mechanism
IFC	International Finance Corporation
LIG	Low Income group
LLP	Limited Liability Partnership
MoEFCC	Ministry of Environment Forest and Climate Change
NBC	National Building Code
NGO	Non-Government Organization
NOC	No Objection Certificate
PMC	Project Management Consultant
RoW	Right of Way
SPV	Special Purpose Vehicle
STP	Sewage Treatment Plant
TNIFMC	Tamil Nadu Infrastructure Fund Management Corporation Limited
TNSF	Tamil Nadu Shelter Fund
TNWWHCL	Tamil Nadu Working Women Hostel Corporation Limited

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CONTENTS

	Page
I. Introduction	1
A. Background	1
B. Project objectives and scope of work	1
C. Applicable reference standards/ frameworks	2
D. Approach and methodology	2
II. Project Overview	3
A. About the project developer	3
B. Description of the project site	3
C. ADB Safeguard Requirements	5
D. Consultations	5
III. Key findings section	5
IV. Grievance Redressal Mechanism	8
V. ESG risk rating	9
VI. Conclusion	9

APPENDICES

Appendix 1: Photographs of the project site	11
Appendix 2: List of documents reviewed	12
Appendix 3: Involuntary Resettlement Impact Assessment	13
Appendix 4: Indigenous People Impact Assessment	14
Appendix 5: Informal public consultation	16
Appendix 6: Sample grievance registration form	17
Appendix 7: Government Order dated 27/09/2022	19
Appendix 8: Land Lease Documents	20
Appendix 9: Environmental Social and Governance (ESG) Rating	21

I. INTRODUCTION

A. Background

1. The Tamil Nadu Infrastructure Fund Management Corporation Limited (TNIFMC), is an Asset Management Company (AMC) promoted by the 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. TNSF invests in affordable housing projects in the private, PPP or Government and/or its agencies. The primary focus of TNSF is:

- (i) Affordable housing – with a focus on housing for the economically weaker (EWS) and low-income groups (LIG),
- (ii) Hostels - for working women from all sections of the society
- (iii) Industrial housing for workers in and around Industrial Complexes/ Parks/ Clusters
- (iv) Senior and assisted living
- (v) Others – Rental housing for students, co-living spaces, etc.

2. Tamil Nadu Working Women's Hostels Corporation Limited (TNWWHCL), which in this project is the investee company, was incorporated in 2020 under the Companies Act, 2013. TNWWHCL undertakes infrastructure development, management and operations of working women hostels, senior living residences etc. to provide safe, affordable accommodation across the state.

3. TNSF is investing in the construction of working women's hostels at proposed locations including Tiruvannamalai. TNSF is committed towards integrating environment, social and governance (ESG) into investee companies and the proposed project. As a part of process, TNIFMC has engaged KPMG Assurance & Consulting Services LLP, an independent consultant, to further conduct a due diligence of the project related to construction of working women hostel at Tiruvannamalai, identify the risks and provide a mitigation plan.

B. Project objectives and scope of work

4. The objectives of conducting an ESG due diligence is to assess and rate the ESG risks associated with the project and suggest suitable mitigation measures against the identified risks. This shall help Tamil Nadu Shelter Fund (TNSF) to make an objective decision on the investment/target. Though a thorough due diligence was conducted based on aspects of integrating environment, social and governance; the scope of this report is limited to present the activities related to due diligence on social safeguards. The section below provides the scope of work and on-site investigation with respect to:

- (i) Past land use of the site and land acquisition/lease agreement review
- (ii) Whether there are any disputes/claims/arbitration in any court of law pertaining to the land and its potential impacts.
- (iii) Whether there is any expected loss of agricultural or productive land due to this project
- (iv) Surrounding land use
- (v) Loss of accessibility to the local community
- (vi) Past track record of the company – Have there been any serious environmental or social incidents in the past

- (vii) On-site consultations with relevant stakeholders such as the local community, key stakeholders, etc.
- (viii) Review with respect to the site on these mandatory topics:
 - a. Past legal non-compliances/ incidents of violation of laws.
 - b. Adverse media articles.
 - c. Any voluntary or involuntary resettlement (physical and economic) scenarios due to the project.
 - d. Assess the capacity of the project owner/ to deal with the social risks and impacts and implement appropriate training and capacity-building measures for safeguards compliance.
 - e. Review of metrics or indicators to gauge the effectiveness of the stakeholder engagement process defined by the project owner.
 - f. Review of metrics or indicators to gauge the effectiveness of the grievance redressal process defined by the project owner.

C. Applicable reference standards/ frameworks

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

D. Approach and methodology

5. The ESG due diligence has been carried out based on the review of the documents provided by the SPV (TNWWHCL) from an ESG perspective, a site visit to the project site, and consultations with the relevant stakeholders.

- (i) Review of documents: Reviewed the land documents and lease agreement, policies, maps of the project site, and the site-specific Environmental Management Plan (EMP).
- (ii) Stakeholder identification: Based on a review of the DFR and consultations with TNSF, identified the relevant stakeholders who might impact or get impacted by the project activities
- (iii) Site visits: A visit to the project site in Tiruvannamalai was conducted on 2 November 2022.
- (iv) Stakeholder consultations: Carried out discussions with the relevant project-related stakeholders like- the District Social Welfare Officer, an officer from government revenue department and residents to obtain additional information beyond the statutory documents-
- (v) Investee company (TNWWHCL)
- (vi) Relevant stakeholders at Tiruvannamalai
- (vii) Reporting: This report presents key social issues and risks and mitigation measures for high-risk issues; if any.

6. This Social Due Diligence report is prepared with the objective of confirming the project was free of involuntary resettlement impact such as land acquisition, physical displacement, economic displacement, adverse impact on livelihood, common properties, indigenous peoples impacts or any other social safeguards implications, prior to construction and remains so, post-construction. The due diligence is based on a review of land records, stakeholder consultations

and field visit to the proposed project location. This document describes the findings of the due diligence and confirms that the working women's hostel project in Tiruvannamalai does not trigger safeguards requirements 2 (involuntary resettlement) and safeguards requirements 3 (indigenous peoples) of ADB's Safeguards Policy Statement 2009.¹

II. PROJECT OVERVIEW

A. About the project developer

7. Tamil Nadu Working Women's Hostels Corporation Limited (TNWWHCL) was incorporated in 2020 under the Companies Act, 2013. TNWWHCL undertakes infrastructure development, management, and operations of working women hostels, senior living residences, etc. to provide safe, affordable accommodation across the state.

B. Description of the project site

Parameters	Description
Project details	Construction of working women's hostel building. Facilities include ramps for the differently abled person, 24*7 security, solar water heaters, solar PVs, STP, RO drinking water, etc. Total beds: 130
Location	The project site is in the municipal limits of Tiruvannamalai district in Tamil Nadu
Survey no	1895/6
Total area	Site area: 1,597 sq. meter
Topography	During the initial site inspection it was observed that the site was partially demarcated and levelled. It is 24 feet MGR Nagar road on western side, and it is only 50 meters from Chengam road on northern side.
Present land use	During the initial site visit, it was observed that the project site was vacant and not being used for any purpose. Refer Appendix 1 for site pictures.
Past land use	As informed by the site staff, the site has been with the govt. for a long period of time, it was a non-agricultural land and was not being used for any purpose.
Boundary	Northern side: Vacant land Southern side: Vacant land Eastern side: Residential houses Western side: 24 ft MGR Nagar road
Surrounding area	1. Tiruvannamalai town police station 2. Tiruvannamalai PWD office

¹ Further, an environmental audit of the project (post construction) is being conducted, which is expected to touch upon / reaffirm the findings of this due diligence from the social safeguards perspective.

Parameters	Description
Access road	The project site has 24 feet MGR Nagar road on western side, and it is only 50 meters from Chengam road on northern side.
Land acquisition	Based on the documents available, it is understood that land is presently with the Social Welfare and Women Empowerment Department of Tamil Nadu and the land has also been leased to the TNWWHCL for a period of 28 years. (Refer Appendix 9)



Google image of the project site

Site details:

8. The project site is in the municipal limits of Tiruvannamalai district in Tamil Nadu. The property is situated off the Chengam road which is having good connectivity to the main commercial and retail developments. The site is a 17,190 Sq. Ft land parcel bearing Sy. No.1895/6, off Chengam road, Near Aavin parlor, Tiruvannamalai. The land was leased from the social welfare department to TNWWHCL in October 2023. The project site is a rectangular land having frontage of 150 ft on MGR Nagar road.. During the initial site inspection it was observed that the project site was partially demarcated and levelled. It has 24 feet MGR Nagar road on western side, and it is only 50 meters from Chengam road on northern side. The associated facilities in the project site like water supply is provided by the local municipality and the sewage is treated through the septic tank which is already part of the project design and there exists an access road to the project site which has been used for the project.

C. ADB Safeguard Requirements

9. Due diligence has been carried out in compliance of ADBs safeguard requirements covering Involuntary Resettlement (Appendix 3) and Indigenous People (Appendix 4). The due diligence details are given below.

ADB safeguard requirements	Applicability	Coverage in the report
Safeguard Requirement 2: Involuntary Resettlement	Yes	<ul style="list-style-type: none"> • E. 1 - Past land use • E. 2 - Any disputes/claims/ arbitration to the land • E 3 - Surrounding land use The involuntary resettlement impact assessment checklist compliance is provided under Appendix 3.
Safeguard Requirement 3: Indigenous Peoples	No	The Indigenous People Impact Assessment Checklist compliance is provided under Appendix 4.

D. Consultations

10. Discussions were held with Meenambikai, District Social Welfare Office, Tiruvannamalai, Junior Engineer, PHC, Tiruvannamalai, Pazhanivel, PHC, Tiruvannamalai on 11.11.2022. The discussions focused on around the past and present land use, any arbitration/ disputes/ claims around the land, any concerns raised by the local community, availability of amenities such as water and electricity, presence of water bodies, environmentally sensitive zones around the site etc. The stakeholders were also made aware of the availability of a grievance redressal mechanism which will be made available to them post the commencement of construction activity. During the construction, two stakeholder meetings were held. The stakeholder consultation involved people from the nearby communities, contractors, PMC, representatives from TNWWHCL, vendors and contractors. Appendix 5 provides details of the consultations held.

III. KEY FINDINGS SECTION

Social

S. No	Topic	Key findings
S. 1	Safety & security	<p>The project site is located very close to the Tiruvannamalai town police station (1.1 Kms).</p> <p>From the safety and security of workers' perspectives, the is manned by security guards 24*7. The PMC along with the contractor was responsible for ensuring the overall health and safety of all the workers, and maintenance of labor camps. The PMC had standard operating procedures in place for activities to be conducted on site. As informed, the PMC followed recommendations of ISO 45001.</p>

S. No	Topic	Key findings
S. 2	Community concerns	Based on the interactions with the DSWO, the response towards the upcoming project was generally positive since Tiruvannamalai has only one ladies hostel accommodating both working women and students. No concerns have been raised by the community.
S. 3	Past legal non-compliance	This is a greenfield project and construction activity is completed. There are no legal non-compliance so far. The same was confirmed during the interaction with the DSWO. The hostel received a go-ahead from the govt. in the form of govt. order dt. 27/09/2022.
S.4	If the easement is utilized within an existing Right of Way (ROW) being used by local people whether a new RoW needs to be created for access to the project site or to maintain access to adjoining sites	During the initial site inspection it was observed that the project site was partially demarcated and levelled. It has 24 feet MGR Nagar road on western side, and it is only 50 meters from Chengam road on northern side. Access to the project site is through this road and does not require the creation of ROW. Access to nearby residents is also available through this road and does not require access through the project site. However, the project area was being used by the residents as a temporary access road. Stakeholders were consulted and notified by the Revenue Department before handing over the land to the Social Welfare Department.
S.5	Number of persons that will be displaced, loss of crop or income by the Project	The project land was empty land with no evidence of previous habitation. Hence no persons were displaced. The project site was neither agricultural land nor had any commercial activity being carried out which can lead to loss of income.

Governance

S. No	Topic	Key findings
G. 1	Corporate level governance policies on: <ul style="list-style-type: none"> Governance Structure Prevention of sexual harassment Anti-bribery and corruption, Child labor Forced labor Whistle-blower Environment health and safety policies 	TNWWHCL has formulated certain policies in place around aspects such as anti-bribery and anti-corruption, forced/ compulsory labor, child labor, whistleblower, grievance redressal, and equal opportunity. The same was applicable to the contractors working on the site as well. Crucial policies which were not in place include the Prevention of Sexual Harassment (POSH) of women and Health and safety policy.
G. 2	Grievance Redressal Mechanism	Based on the documents shared and interactions conducted with TNIFMC officials, it is understood that the grievance redressal process has been drafted and documented. The same has been verified. As mentioned by TNIFMC officials, the mechanism covers three categories of stakeholders

S. No	Topic	Key findings
		<p>namely external stakeholders at the project site, those affected by the project, and the investors of the Fund.</p> <p>The grievances can be received by any or all the following means: phone, post/courier, SMS, webpage, or face-to-face.</p> <p>A Grievance Register (GR) is maintained at the main security gate of the site and at Project Site Office for recording the grievances.</p> <p>The site maintains at a minimum, a database on the following metrics:</p> <ul style="list-style-type: none"> • Number of complaints received • Number of complaints resolved • Details of the complaints that have gone to mediation.
G.3	Monitoring and reporting	<p>As understood during the interactions, TNWWHCL in coordination with the PMC will conduct internal environmental monitoring, and compliance review and prepare Quarterly Progress reports for the project site.</p> <p>All applicable legal requirements are identified and documented in the EMP. The PMC was responsible for obtaining permissions and licenses.</p>
G.4	Contractor management	<p>TNWWHCL in coordination with PMC developed and documented pre-qualification criteria for the selection of contractors. As mentioned in the tender document, the contractor was responsible for preparing standard operating procedures for the execution of work on the project site.</p>
G.5	Stakeholder engagement	<p>The company has engaged with the local panchayat and has got the necessary approvals as required. During the visit, the residents responded positively to the project.</p>
G.6	Consents/permits/clearances	<p>The land lease agreement is executed (Refer Appendix 9). Govt. order dt. 27/09/2022 and has been issued regarding the construction of working women hostel at the site (Refer Appendix 7).</p> <p>The building plans, were approved by District town and country planning office, Tiruvannamalai.</p> <p>Environmental clearance is not required for the project.</p>
G.7	Adverse media articles	<p>No adverse media article was found during the desktop research.</p>

IV. GRIEVANCE REDRESSAL MECHANISM

11. TNWWHCL has established the Grievance Redressal Committee and the Grievance Redress Mechanism (GRM) structure is displayed outside the project site. To ensure that the suitable functioning of the GRC, officers and focal points were established within the PMC and Contractor. Records of complaints (refer Appendix 6 – sample grievance form) received and how they are addressed was maintained by the TNWWHCL and reported to TNIFMC in the monitoring reports. Contact details and names of the staff concerned, and contractors were posted at all construction sites in visible locations. The following GRM structure is followed.

12. **Field level.** The Contractor designated an on-site Grievance Redress Officer (GRO)-1 in consultation with the PMC and TNWWHCL. The field level GRC is the Tier-1 committee, and it consists of nominated members from the labour group, EHS Officer, senior engineer, safety engineer and chaired by assistant engineer of TNPHC. The Tier-2 GRC is chaired by the CEO of TNWWHCL and consists of Business Head, and project engineer from TNWWHCL. The Tier-3 GRC will receive and record the complaint of the subproject site, and it will be headed by the TNSF Fund Manager assisted by the ESG Analyst and Investment Analyst. Alternatively, the complaint can be registered by phone call, message, email to GRO-1 and any complaints received by the contractor or site engineers will be reverted to the onsite GRO-1 for 1st level resolution. The complaint will be reviewed and on-site GRO-1 with assistance from the Site engineer of the Contractor will try to resolve the issue on-site in consultation with the aggrieved party. This will be done within 7 days of receipt of a complaint/ grievance.

13. **Subproject level.** All grievances that cannot be redressed within 7 days on-site level will be brought to the notice of the subproject level, tier 2 GRO officer. The subproject GRO-2 will resolve the grievance within 14 days of receipt of a complaint/ grievance with support of safety engineers and senior level engineers. The grievance at this tier 2 must be resolved in 14 days of its receipt.

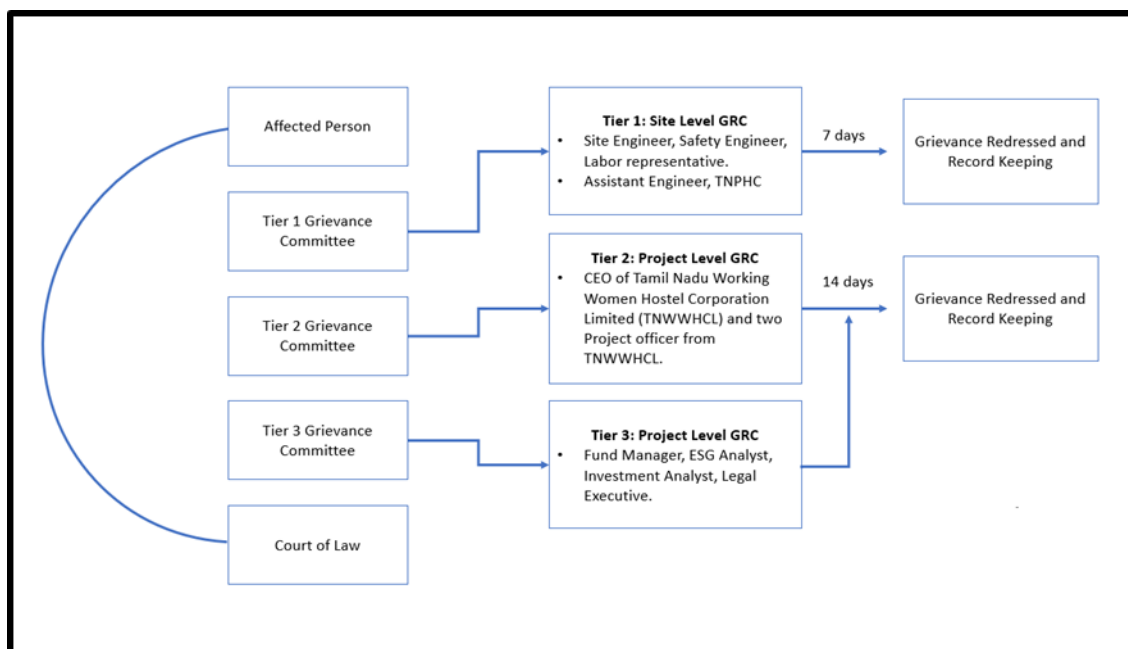
14. **Fund level.** If the grievance is not resolved in tier 2 level, the grievance will be referred to tier 3 committee at TNFIMC level. The grievance at this level must be resolved within 14 days of its receipt.

15. The project GRM notwithstanding, an aggrieved person shall have access to the country's legal system at any stage. This can run parallel to accessing the GRM and is not dependent on the negative outcome of the GRM.

16. **ADB's Accountability Mechanism.** If the established GRM is not in a position to resolve the issue, the affected persons can also use the ADB Accountability Mechanism by directly contacting (in writing) the complaint receiving officer at ADB headquarters or the ADB India Resident Mission. The complaint can be submitted in any of the official languages of ADB's Developing Member Countries. The ADB Accountability Mechanism information will be included in the project information document to be distributed to the affected communities, as part of the project GRM.

17. **Periodic review and documentation of lessons learned:** During the project, one stakeholder consultation right before funding the project in March 2025 was conducted. The project was nearing completion, and no major feedback was received during the consultation.

18. **GRM Structure:** The following GRM structure was approved and was applicable to the project through the construction period.



V. ESG RISK RATING

19. TNSF has developed an ESG risk rating tool to identify and evaluate material ESG risks related to the project activities. Based on the site visit, stakeholder's consultation, and document review, issues have been identified and evaluated for their "likelihood of occurrence" and "severity of potential impact" for this project.

20. The issues identified are based on the current project status and may evolve during the construction and operational phase. The overall risk rating is coming 30.21% which falls on "medium" risk on the project risk rating scale with an overall score of 70. The separate scores for the social, and governance are discussed are provided in Appendix 9.

VI. CONCLUSION

21. The Social Due Diligence study reveals that the potential impacts during the construction and operational phase of the project were very much understood and manageable i.e., Impacts were avoided or minimized. The working women's hostel is a green field project and construction is completed. The land for the project was a rocky wasteland and were no trees on the site. The land is leased to TNWWHCL from the Social Welfare Department, Government of Tamil Nadu, for a period of 28 years. Refer Appendix 8. The project site is not located in environmentally sensitive areas. A Government Order dated 27/09/2022 was received providing a go ahead for the construction of the working women hostel at the then proposed site.

22. The company has in place all the necessary corporate governance policies and management systems. From the corporate governance point of view, no major gaps were identified. No major social issues were found in the due diligence process.

- (i) Based on the Social due diligence study, the Project in its current state was found to be compliant with the ESG requirements of TNSF ESGMS, IFC (PS), World Bank (ESS), and ADB (SPS).

23. The Social Due Diligence report confirms that the project was free of involuntary resettlement impacts such as land acquisition, physical displacement, economic displacement, impact on livelihood, common properties, indigenous peoples impacts or any other social safeguards implications, prior to construction and remains so, post-construction. The due diligence confirms that working women's hostel project in Tiruvannamalai does not trigger safeguards requirements 2 (involuntary resettlement) and safeguards requirements 3 (indigenous peoples) of ADB's Safeguards Policy Statement 2009.²

² Further, an environmental audit of the project (post construction) is being conducted, which is expected to touch upon / reaffirm the findings of this due diligence from the social safeguards perspective.

Appendix 1: Photographs of the project site



Appendix 2: List of documents reviewed

1. Field Measurement Book (FMB) Sketch
2. Detailed feasibility report by Knight Frank
3. Concept design by Kharche Associates
4. Govt. Order (G.O) No. 59, dt. 27/09/2022
5. Sanctioned building plan by District town and country planning office, Tiruvannamalai dt.
01/10/2021

Appendix 3: Involuntary Resettlement Impact Assessment

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.

Information on subsection/section:

District/administrative name: Tiruvannamalai District

Technical description: The project involves the construction of a G+2 working women's hostel.

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				
Will there be land acquisition?		✓		The land belongs to the Social Welfare Department, Government of Tamilnadu and has been leased to the TNWWHCL for a period of 28 years.
Is the site for land acquisition known?				Not applicable
Is the ownership status and current usage of land to be acquired known?				The land is owned by the Social Welfare Department, Government of Tamilnadu. The land use prior to project intervention was rocky wasteland.
Will easement be utilized within an existing Right of Way (ROW)?				Not applicable
Will there be a loss of shelter and residential land due to land acquisition?				Not applicable
Will there be a loss of agricultural and other productive assets due to land acquisition?				Not applicable
Will there be losses of crops, trees, and fixed assets due to land acquisition?				Not applicable
Will there be a loss of businesses or enterprises due to land acquisition?				Not applicable
Will there be a loss of income sources and means of livelihood due to land acquisition?				Not applicable
Involuntary restrictions on land use or on access to legally designated parks and protected areas				
Will people lose access to natural resources, communal facilities, and services?		✓		
If land use is changed, will it have an adverse impact on social and economic activities?		✓		
Will access to land and resources owned communally or by the state be restricted?		✓		
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project?				
Yes [], No [], Not applicable [✓]				
Are any of them poor, female heads of households, or vulnerable to poverty risks?				
Yes [], No [], Not applicable [✓]				
Are any displaced persons from indigenous or ethnic minority groups?				
Yes [], No [], Not applicable [✓]				

Appendix 4: Indigenous People Impact Assessment

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.

Information on subsection/section:

District/administrative name: Krishnagiri District

Technical description: The project involves the construction of a G+4 working women's hostel.

Screening questions for indigenous people impact

Key concerns (Please provide elaboration in the 'Remarks' column)	Yes	No	Not Known	Remarks
Indigenous people identification				
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 was vacant and uninhabited. 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. As per the census report of 2011 for Tiruvannamalai ³ district, the total population is 20,39,049 of which only 4.2% of the population belong to the ST community. Further the district does not have any scheduled areas as defined under the Indian constitution. No positive or negative impacts to scheduled tribe population is anticipated as a result of the project.
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
Do such groups self-identify as being part of a distinct social and cultural group?				Not Applicable
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
Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?				Not Applicable
Do such groups speak a distinct language or dialect?				Not Applicable

³ <https://cdn.s3waas.gov.in/s318997733ec258a9fcdf239cc55d53363/uploads/2018/06/2018062133.pdf>

Key concerns (Please provide elaboration in the 'Remarks' column)	Yes	No	Not Known	Remarks
Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?				Not Applicable
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				
Will the project directly or indirectly benefit or target indigenous people?		✓		
Will the project directly or indirectly affect indigenous people's traditional sociocultural and belief practices (e.g., child-rearing, health, education, arts, and governance)?		✓		
Will the project affect the livelihood systems of indigenous people (e.g., food production system, natural resource management, crafts and trade, employment status)?		✓		
Will the project be in an area (land or territory) occupied, owned, or used by indigenous people, and/or claimed as an ancestral domain?		✓		
Identification of special requirements. Will the project activities include the following?:				
Commercial development of the cultural resources and knowledge of indigenous people?		✓		
Physical displacement from traditional or customary lands?		✓		
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?		✓		
Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		✓		
Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		✓		

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.

Appendix 5: Informal public consultation



On-site interaction with stakeholders



Brief minutes of discussions held

Names of members present	Meenambikai, District Social Welfare Office, Tiruvannamalai Junior Engineer, PHC, Tiruvannamalai Pazhanivel, PHC, Tiruvannamalai
Date and time	11/11/2022 & 11:30 AM
Details of discussions held	The discussion with the available stakeholders revolved around the past and present land use, any arbitration/ disputes/ claims around the land, any concerns raised by the local community, availability of amenities such as water & electricity, presence of water bodies, environmentally sensitive zones around the site etc. The stakeholders were also made aware of the availability of a grievance redressal mechanism which will be made available to them post the commencement of construction activity. During the construction, two stakeholder meetings were held. The stakeholder consultation involved people from the nearby communities, contractors, PMC, representatives from TNWWHCL, vendors and contractors.

Appendix 6: Sample grievance registration form
(To be made available in Tamil and English)

(Grievance resolution report must be submitted to TNSF within one (1) week time of resolution)	
Case No:	Date:
Name of the Person Raising Grievance/ Complainant:	
Phone:	
Email:	
Address:	
Gender:	
Designation/ position:	
Location where the grievance occurred:	
Grievance category	<ul style="list-style-type: none"> Environmental pollution Social issues such as labor practices, working conditions, etc. Resettlement/displacement Community health and safety Violations of policies, guidelines, and procedures Misuse of funds/lack of transparency, or other financial management concerns Abuse, and discrimination Bribery and corruption Non-compliance to local laws
Description of grievance	
Supporting documents (if any)	
Whether the person recording the grievance would like to identity himself/ herself confidentiality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Key personnel to be consulted/interacted to resolve the grievance	
How do you want us to reach you for feedback on your comment/grievance?	
Signature of the person recording the grievance (in case of verbal grievance)	
Signature of the complainant	
To be filled by Field Level GRO	

Tamil Form

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>		
உங்கள் கருத்து / புகாருக்கான பதிலை எவ்வாறு பெற விரும்புகிறீர்கள்?		

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:			

Appendix 7: Government Order dated 27/09/2022



ABSTRACT

Social Welfare and Women Empowerment - Construction of Working Women Hostel with 132 beds in Tiruvannamalai District - Sanction of expenditure - Orders - Issued.

Social Welfare and Women Empowerment [SW3(1)] Department

G.O.(Ms) No.59

Dated: 27.09.2022

சுபகிருது, புரட்டாசி 10,

திருவள்ளூர் 2053.

Read:

1. G.O.(Ms).No.22, Social Welfare and Nutritious Meal Programme [SW3(1)] Dept, dated 28.05.2019.
2. Government Letter No.14499/SW3(1)/2022, dated 27.10.2021.
3. From the Director of Social Welfare letter Roc.No.16395/WW2(2)/2018, dated 31.03.2022 and 04.05.2022.

Order:-

In the Governor's Address of 2021, an announcement has been made that to encourage greater work participation by women, Working Women Hostels will be established in every District.

2. In Government Letter second read above, instruction have been issued to the Director of Social Welfare to send the proposal for financial sanction for the Working Women Hostels for which in-principal orders have been issued vide G.O (Ms) No.06, Social Welfare and Nutritious Meal Programme [SW3] Department, dated 13.01.2015 alongwith the identification of land, approved building plan and actual requirement of fund etc., as per financial norms towards the construction of own building to these hostels.

3. In the Letters third read above, the Director of Social Welfare has sent a proposal to sanction an expenditure of Rs.10.15 crore towards the construction of Working Women Hostel for 132 beds in Tiruvannamalai District through Tamil Nadu Police Housing Corporation. The District Collector, Tiruvannamalai has permitted enter upon for a land measuring 1597 sq.mt at Survey No. 1895/4 in Tiruvannamalai District for construction of Working Women Hostel with build-up area of 2,202 sq.mt. Hence, 132 beds have been proposed based on the size of the land and the

(P.T.O)

Appendix 8: Land Lease Documents

ரூ: 20/- தேதி: 13.10.2023	TAMILNADU WORKING WOMEN'S HOSTEL CORPORATION LIMITED TIRUVANNAMALAI	G. RAJENDRAN GOVT STAMP VENDOR L.C. No: 1/2000 Tiruvannamalai-JII
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LEASE AGREEMENT

THIS Lease Agreement ("**Agreement**") is made at Tiruvannamalai on this Friday(13) day of October, 2023 ("**Effective Date**")

BETWEEN

DIRECTOR OF SOCIAL WELFARE, GOVERNMENT OF TAMIL NADU, having its office at Panagal Maligai, 2nd Floor, Saidapet, Chennai- 600 015 and acting through its Authorized Signatory, District Social Welfare Officer, Chengalpattu District, duly authorized by the Director of Social Welfare hereinafter referred to as the "**Lessor**" or "**Department of Social Welfare**" which expression shall unless it be repugnant to the context or meaning thereof be deemed to mean and include its successors and permitted assigns of the **First Part**;

AND

by Subdy
13/10/2023


மாநாட் சமூகநல அலுவலர்,
திருவண்ணாமலை

For TNWWHC Ltd.

M. T. Janditha

Officer on Special Duty

Document No. <u>4934</u> of <u>2022</u>	of Book <u>25</u>
Contains <u>25</u> Sheets.....Sheet.	
Registering Officer.	




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

Appendix 9: Environmental Social and Governance (ESG) Rating

TNSF has developed an ESG risk rating tool to identify and evaluate material ESG risks related to the project activities. Based on the site visit, stakeholder's consultation, and document review, issues have been identified and evaluated for their "likelihood of occurrence" and "severity of potential impact" for this project.

The issues identified are based on the current project status and may evolve during the construction and operational phase. The overall risk rating is coming 30.21% which falls on "medium" risk on the project risk rating scale with an overall score of 70. The separate scores for the environment, social, and governance are discussed below:

Project Risk Rating		
	Risk Level (%)	ESG Risk Rating
	30.21	Medium

Environmental risk rating

As per the ESG risk rating tool, there are a total of 16 environmental risks identified in the project out of which 4 qualify as material ESG risks. The dimensional risk score is 40. The screenshot of the ESG risk rating tool is shown below:

Category	Type of Issue	Source	Importance (In terms of financial risk to the Fund's performance)	Importance (In terms of Environmental or Social or Reputational risk to the Fund)	Total Risk Score	Dimensional Risk Score	Material Risk
Environmental	Past land use	Due Diligence	0	0	0	39	No
	Disputes/ arbitrations/ claims related to land	Due Diligence	0	0	0		No
	Soil and ground water contamination	Due Diligence	1	2	3		No
	Loss of biodiversity due to land clearing	Due Diligence	0	0	0		No
	Construction and other waste disposal	Due Diligence	2	3	5		Yes
	Sources and availability of water	Due Diligence	2	2	4		Yes
	Consumption of water	Due Diligence	1	2	3		No
	Impact of water availability on local community	Due Diligence	1	1	2		No
	Potential impact on waterbody nearby	Due Diligence	0	0	0		No
	Effluent management	Due Diligence	1	2	3		No
	Sensitive areas (cultural and heritage sites)	Due Diligence	0	0	0		No
	Adverse impact on air, water, aesthetic pollution on the environment due to construction activities	Due Diligence	2	4	6		Yes
	Serious environmental incidents	Desk-Based Research	1	2	3		No
	Serious environmental liabilities	Due Diligence	1	2	3		No
	Availability and validity of the environmental clearance and other permits	Due Diligence	2	2	4		Yes
	Implementation of EMP	Due Diligence	1	2	3		No

Social risk rating

As per the ESG risk rating tool, there are a total of 5 social risks identified in the project out of which 2 qualify as material ESG risks. The dimensional risk score is 40. The screenshot of the ESG risk rating tool is shown below:

Category	Type of Issue	Source	Importance (In terms of financial risk to the Fund's performance)	Importance (In terms of Environmental or Social or Reputational risk to the Fund)	Total Risk Score	Dimensional Risk Score	Material Risk
Social	Safety & security	Due Diligence	1	3	4	10	Yes
	Community concerns	Due Diligence	1	1	2		No
	Non-compliance with labour laws	Due Diligence	2	2	4		Yes
	people displaced, loss of crop or income due to project	Due Diligence	0	0	0		No
	Adverse media articles	Desk-Based Research	0	0	0		No

Governance risk rating

As per the ESG risk rating tool, there are a total of 5 social risks identified in the project out of which 2 qualify as material ESG risks. The dimensional risk score is 40. The screenshot of the ESG risk rating tool is shown below:

Category	Type of Issue	Source	Importance (In terms of financial risk to the Fund's performance)	Importance (In terms of Environmental or Social or Reputational risk to the Fund)	Total Risk Score	Dimensional Risk Score	Material Risk
Governance	Corporate level governance policies	Due Diligence	2	3	5	9	Yes
	Grievance redressal mechanism	Due Diligence	1	3	4		Yes
	Contractor management issues	Due Diligence	2	3			No
	Stakeholder engagement issues	Due Diligence	2	2			No
	Past legal non-compliance	Due Diligence	0	0			No

Material ESG risks for the project are listed below

Based on the ESG risk rating tool assessment, there are a total of 8 material ESG risks identified with an individual dimensional rating above 4. The mitigation and management plan for these material risks are provided in the next section. The screenshot of the ESG risk rating tool for showing the list of Material Topics is shown below:

List of material topics	
Category	Material topics
Environmental	1. Construction and other waste disposals
	2. Sources and availability of water
	3. Adverse impact due to air, water, noise, and aesthetic pollution on the environment, cultural & heritage sites due to construction activities
	4. Availability and validity of the environmental clearance and other permits
Social	5. Non-compliance with labor laws
	6. Safety and security
Governance	7. Corporate-level governance policies
	8. Grievance redressal mechanism