

# Due Diligence Report

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

Industrial Housing Facility at SIPCOT Vallam  
Vadagal, Sriperumbudur, Kanchipuram District,  
Tamil Nadu

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

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## **LIST OF ABBREVIATIONS**

ADB	Asian Development Bank
DSW	Department of Social Welfare
DFR	Detailed Feasibility Report
ESG	Environment, Social and Governance
ESGDD	Environment, Social and Governance Due Diligence
EWS	Economically Weaker Sections
GDP	Gross Domestic Product
GoTN	Government of Tamil Nadu
GRM	Grievance Redressal Mechanism
GRO	Grievance Redressal Officer
IFC	International Finance Corporation
LIG	Lower Income Group
MAP	Mitigation Action Plan
SPV	Special Purpose Vehicle
SIPCOT	State Industries Promotion Corporation of Tamil Nadu
TNIFMC	Tamil Nadu Infrastructure Fund Management Corporation Limited
TNSF	Tamil Nadu Shelter Fund
TNWWHCL	Tamil Nadu Working Women's Hostels Corporation Limited

## I. INTRODUCTION

### A. 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 is to invest in:

- 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 is among the most industrialized states in the country. The state has a diversified industrial base which contributes significantly to the gross domestic product (GDP) of the state through its strengthened infrastructure, highly skilled human resources and necessary backing from the government. The state accounts for 42% of the entire women workforce in India's manufacturing sector.<sup>1</sup> 64% of the women in Tamil Nadu are engaged in the service and manufacturing sector in various roles. Many of these women migrate from Tier II, III & IV towns and villages in the state for employment. The pro-active policy environment is enabling more women to join the workforce. In order to provide supporting social infrastructure to this strong workforce, the Tamil Nadu Shelter Fund (TNSF) is investing in an Industrial Housing Project, located in Vallam Village, Sriperumbudur Taluk, Kanchipuram District, Tamil Nadu. In this context, Chola MS Risk Services (CMSRS), hereafter referred to as "Consultant", was approached for conducting the environment, social and governance (ESG) due diligence assessment for the project.

4. TNSF is committed towards integrating environment, social and governance (ESG) into its investee companies and proposed project. This document presents the findings of the social due diligence assessment and necessary remedial Mitigation Action Plan (MAP) which provides relevant mitigation measures. This shall help the investor determine the associated ESG risks of the project and make an objective decision on the proposed investment.

### B. Objectives and Scope of Work

5. The scope of the assessment includes an evaluation of the social and governance aspects of the developments in the project and the developer against the applicable standards. The consultant has used the ESG Risk Rating tool of the investor, relevant National, State and Local regulations, World Bank and International Finance Corporation's (IFC) Performance standards for conducting this assessment. This includes but is not limited to, the following aspects:

6. Background check of Project Owner: On corporate governance including policies and processes related to anti-bribery and anti-corruption policies, fraud, whistle-blower, diversity

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<sup>1</sup> Annual Survey of Industries, 2021-2022.

and inclusion, prevention of sexual harassment, child labor, forced labor, environment health and safety, governance structures, regulatory compliances, incidents against any key managerial personnel of the promoter.

7. The section below provides the scope of work and on-site investigation with respect:

- Past land-use of the site and ownership status of land
- Surrounding land use
- Past track record- regarding any serious social incidents in the past
- Legal non-compliances/incidents of violations of laws
- Adverse media articles
- Any voluntary/involuntary resettlement or rehabilitation issues due to the project
- Assess the capacity of the project owner/to deal with the social risks and impacts, implement appropriate training and capacity building measures for safeguard compliance.

### C. Applicable Reference Frameworks

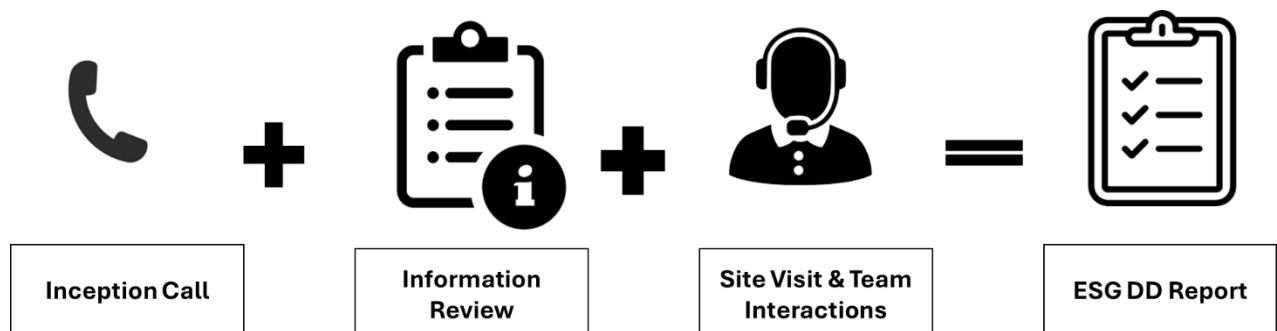
8. The reference frameworks for this due diligence report (DDR) are as follows:

- a) TNSG Environment Social Governance Management System (ESGMS)
- b) Asian Development Bank Social Performance Standards, 2009
- c) World Bank Environmental, Health and Safety Guidelines
- d) Applicable National, State and Local Environmental and Social legislations

### D. Approach and Methodology of this Due Diligence Report

9. The approach and methodology for the DDR is presented in the subsequent sub-sections

**Figure 1: Approach and Methodology of ESG DD**



10. **Inception Meeting.** A site visit was conducted with the Industrial Housing site team (SIPCOT & [REDACTED] representatives) and an information checklist was shared with the project team with the following objectives.

- ❖ Gain a detailed understanding of the project
- ❖ Obtain an overview of the current status of the project

11. **Information Review.** The consultant prepared a Project Information Checklist to obtain information about the project and its management. A detailed list of documents and records was requested for review which were aligned to the reference frameworks. Additional information was requested based on outcomes of subsequent interactions. The documents and records received from the team were reviewed for scoping the project site and set the basis for subsequent team interactions.

12. **Desk Review.** A review of publicly available information through available media sources and web search was done to identify any past issues with the company on aspects related to environmental, occupational health and safety, labor welfare and community welfare and safety aspects. The review also included search for any ongoing or past NGO attention/campaigns that may lead to reputational risks to the company and/or investors.

## II. PROJECT OVERVIEW

### A. About Project Developer

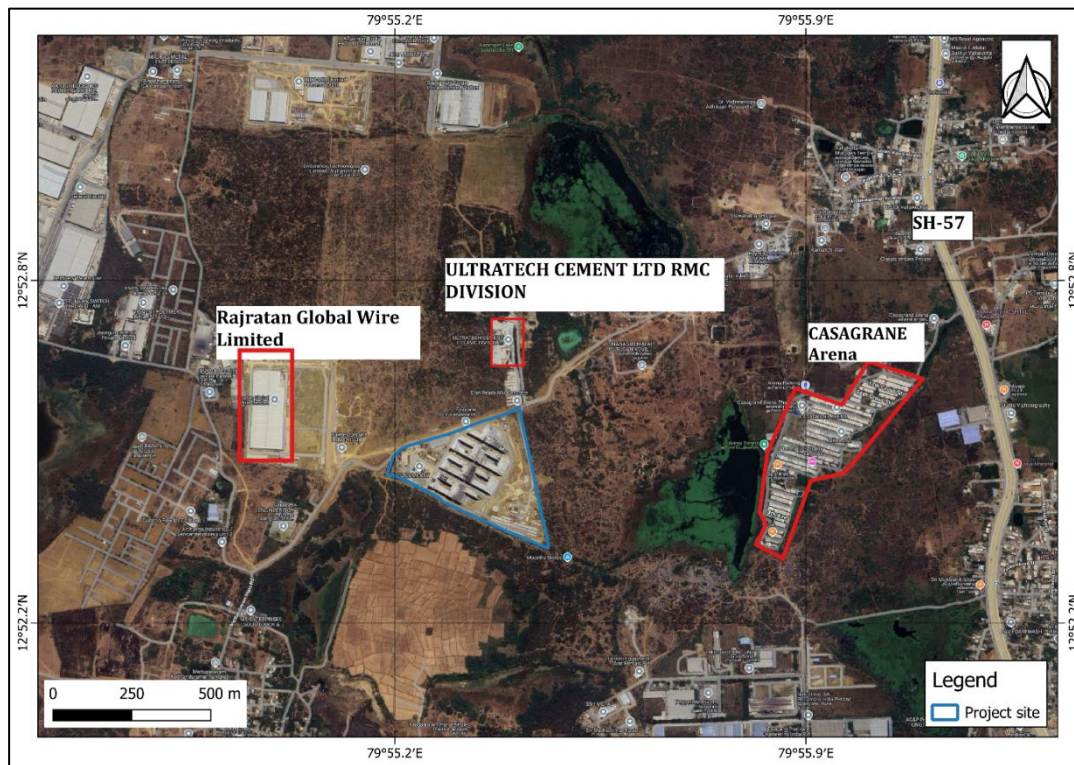
13. The State Industries Promotion Corporation of Tamil Nadu (SIPCOT), hereafter referred to as “Developer” in the document, is the nodal agency for promotion of industrial activity in the state. SIPCOT has developed an industrial housing facility at its industrial estate in Vallam Vadagal. The project has been primarily developed to meet the industrial housing needs of female workers of [REDACTED] Pvt Ltd, an I-phones parts manufacturer. The project has been developed through a government of India grant under the Affordable Rental Housing Complex (ARHC) scheme. SIPCOT has also formed a Special Purpose Vehicle (SPV) – Tamil Nadu Industrial Housing Private Limited (TNIHPL) jointly with the Tamil Nadu Infrastructure Fund Management Corporation Ltd (TNIFMC) to provide affordable and sustainable industrial housing options for industrial workers across its other industrial estates across the state.

### B. About the Project

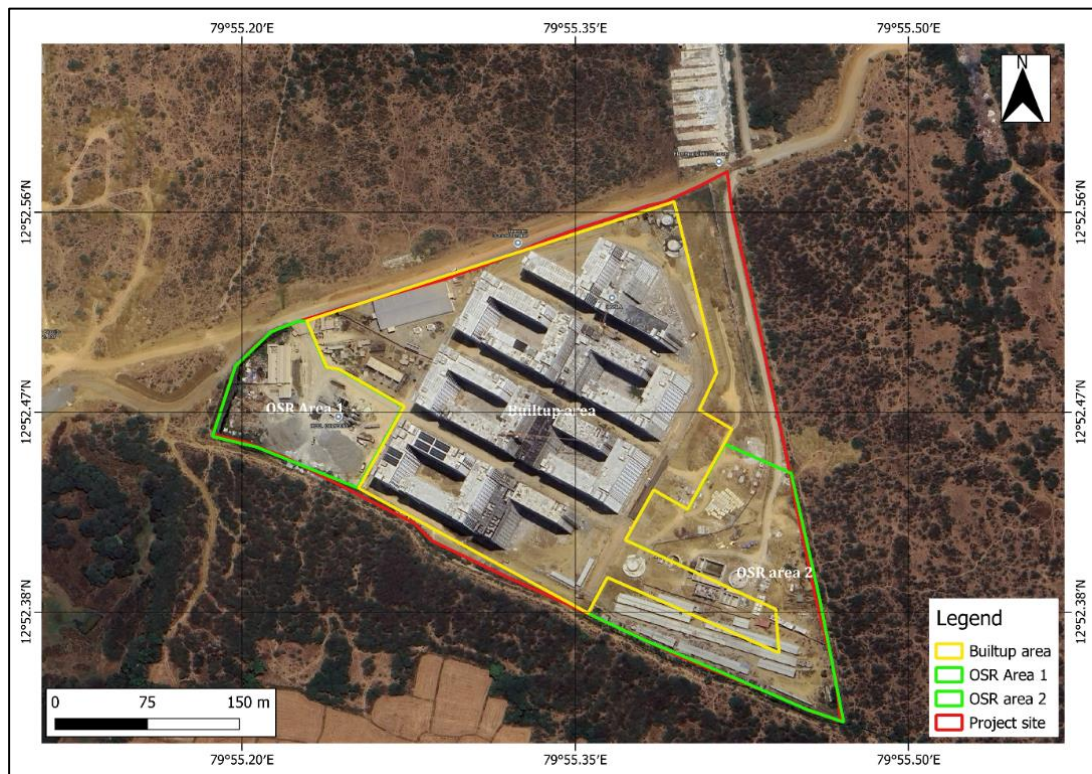
14. The project is an industrial housing project developed at SIPCOT Vallam Vadagal industrial estate, Sriperumbudur Taluk, Kanchipuram district. The project is exclusively an industrial housing project, currently developed for the housing needs of [REDACTED] India Ltd and is built to cater to the housing needs of 18,720 female employees. Geographically the site is situated at 12°52'28.51"N, 79°55'21.90"E.



**Figure 2: Overview of the Project Site**



15. **Land.** The land is currently under the ownership and possession of SIPCOT and a lease deed has been executed between SIPCOT and [REDACTED]. The site has been allocated for the purposes of industrial housing in the original layout of SIPCOT and there are no legacy land issues. No land disputes have been recorded with respect to the site as per the desk review and no adverse news articles or ESG issues have been recorded with respect to the site. Due Diligence (primary document verification and review of secondary data sources) has confirmed that there is no involuntary resettlement impacts or relocations have been assessed pertaining to the site.

**Figure 3: Project Site Details**

16. **Details of Project Site.** The following are the details of the project site.

**Table 1: Details of Project Site**

Parameters	Description
Project Details	<b>Building</b> - Industrial Housing Facility for female workers of [REDACTED] with a S+10 structure <b>Total Bed Capacity</b> – 18,720 beds
Site Location	The project is located in Villages A & B of Vallam, Sriperumbudur Taluk, Kanchipuram district, Tamil Nadu.
Survey Nos	<b>Vallam Village A</b> - Survey Nos: 237pt, 238, 239pt/1-133, 241pt, 242pt, 243, 247pt, 265, 266, 267, 268pt, 269pt, 270. <b>Vallam Village B</b> – Survey Nos: 271, 272 pt, 275pt, 276pt, 277pt, 278, 279pt, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302.
Total Area Details	Total Land Area – 30.83 acres Total Built up Area – 2,07,736 sq.m (22, 36,051.69 sq.ft)
Present Land Use and Land Type	<b>Land Classification</b> - Industrial. Sanction given by Tamil Nadu Government for development of Industrial Housing.
Past Land Use	Past land use of the site is undeveloped land as per G.O. Ms No: 3 dt. 06.01.2009 and agricultural crop land and agricultural fallow land (As per Bhuvan 2015-16). The historical imagery of the site is presented in Annexure 1 (Ref: Historical timeline of the site).

Parameters	Description
Boundary and Adjoining Area	Most of the land use around the project site is classified as waste lands. The neighboring lands are currently vacant and are yet to be allocated to industries. A few industries are located adjacent to the project and near the project area such as Rajratnam Global wire and Ultratech Cement RMC Ltd.
Access Roads	Internal and External roads are provided by SIPCOT of the following widths: Main access road – 30m and Internal roads of 12m  The site is connected to the NH 4 /AH 45 (Chennai –Kolkata) located ~5.31 Km and to NW SH 57(Perumalpattu-Kottamedu Rd) located ~0.83 Km, through the Vallakottai panchayat road.
Topography	The average elevation of the site is 73m above mean sea level. The district is mainly flat to the sea.

17. **Connectivity to the Project.** The project location is well connected and is accessible with various forms of transport available making the site ideal for construction of the industrial housing facility for the female workers. Some details regarding the connectivity aspects are provided below.

**Table 2: Connectivity to the Project**

Connectivity	Observation
<b>Project Borders</b>	The project site is located in Vallam 'A and B' Village of Sriperumbudur Taluk (sub-district) of Kancheepuram District. The site is bounded by Ultratech Cement Ltd. (RMC Division, Oragadam) to the north, located 150 meters away. To the south, the area consists of barren land. On the eastern side, the Casa Grande Arena residential area is situated at a distance of 780 meters. To the west, Rajratan Global Wire Limited is located 350 meters from the site.
<b>Highway/ Access Road</b>	The proposed site is located approximately 0.83 km (E) away from SH-57 (Perumalpattu-Kottamedu Road)
<b>Railway Station</b>	The nearest railway station is Palayasivaram Railway Station, which is located approx. 11.56 Km (SSW)
<b>Bus station</b>	The nearest bus station is Vallakottai which is 1.5 Km from the project site.
<b>Airport</b>	The nearest airport to the site is Chennai International Airport, which is around 29.8 km North-west of the project site.

18. **Key Social Infrastructure.** The table below provides the details regarding the multiple social infrastructure and urban facilities near to the site.

**Table 3: Key Social Infrastructure**

Social Infrastructure	Observations
Educational Institutes	Sri Venkateswara College of Technology - 2.69 Km Apollo Polytechnic College, - 3.7 Km Sri Krishna Engineering College - 4.79 Km Eraiur Govt Primary School; 600 m
Hospitals/Health Care Facilities	Oragadam ESI Dispensary- 2.97 Km Sri Devi Hospital – 6.21 Km Katchipedu Government Hospital – 8.33 Km Pandian Hospital – 9.23 Km
Police Station	Oragadam Police Station – 4.35 Km SVC Police Station – 5.64 Km Sriperumbudur Police Station – 9.18 Km
Convenience Stores/Entertainment Facilities	E-Spa Vallakottai – 1.42 km Grand Café – 1.6 km Seoul Store Supermarket – 1.5 km

19. **Socio-Economic Profile of the Location.** Vallam is a village in Sriperumbudur Taluk (sub-district) located 30km east of the district headquarters of Kanchipuram. The total population of Vallam is 2837 and there are 708 households in the village. The overall literacy rate of the village is 69.9% and the working population rate is 46.2%. Vallam Village is situated in the district of Kanchipuram which is the 2<sup>nd</sup> most populated districts of Tamil Nadu. The rate of urbanization in the district has been quite haphazard and very swift and is also a densely populated industrial zone. Out of the total district population of 3,998,252, the scheduled tribe population of the entire district is 1.03% of the total population and are scattered.<sup>2</sup> Further the district does not have any scheduled areas under the Indian constitution. A brief snapshot of the socio-economic profile of the district is as follows:

**Table 4: Socio-Economic Profile of the Location**

Parameters	Description
Total Population of District	3,998,252
Population Density	910
% of urban and rural population	63.49% and 36.51%
% of scheduled caste and scheduled tribe population	23.71% and 1.03%, respectively
Literacy Rate	84.5%
Work Participation Rate (%)	41.86%

<sup>2</sup> <https://censusindia.gov.in/nada/index.php/catalog/45355>



### III. KEY FINDINGS

#### A. Social Impact Assessment

20. **Landownership and Transfer details:** The project land is currently allotted and under the ownership of SIPCOT. The land was allocated for industrial housing purposes. Due diligence has confirmed that there will be no voluntary or involuntary resettlement or relocations or evictions from the land parcel which is vacant and devoid of any structures and the land parcel was not used by any individual or community institution for any productive purpose. The land ownership document and the lease deed executed between SIPCOT and [REDACTED]. The land ownership document has been provided as Annexure 2. The historical data presented through Google Earth images/maps since 2014 to 2023 points out that the land parcel was vacant and not utilized for any productive purpose (Annexure 1). As per the census report of 2011 for Kanchipuram district, the total population is 39,98,252 of which only 1.03% of the population belong to the scheduled tribe community.<sup>3</sup> Further, the district does not have any scheduled areas under the Indian constitution. At its current stage and during the construction stage, the project will not have any direct or indirect impact on the indigenous people including to their dignity, human rights, livelihoods, territories, or the natural and cultural resources associated with indigenous peoples or their ancestral domains and assets. The onsite assessment and review of land ownership details / records on involuntary resettlement and indigenous peoples confirmed that there will neither any involuntary resettlement, or indigenous peoples impacts. The involuntary resettlement and indigenous peoples checklist documented as Annexure 4 and 5 respectively.

21. The site does not have any land legacy disputes, and it does not have any cattle grazing on the project site. A stakeholder engagement and consultation has been conducted, the details of which are documented as **Annexure 5**.

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<sup>3</sup> <https://censusindia.gov.in/nada/index.php/catalog/45355>

#### IV. STAKEHOLDER ENGAGEMENT PLAN

22. Stakeholder Consultations were conducted with the objective of collecting information about the project and its impact. It also helped to determine the concerns regarding the project among the inhabitants and the local community.

##### A. Identification of Stakeholders

23. The stakeholders consulted for the project include representatives from SIPCOT (Project Developer), inhabitants of the facility and representatives from the Facility Management Services team of [REDACTED]. The consultations were held during the site visit undertaken on 28 February 2024. Discussions were held regarding the past land use, site ownership, construction process, project details and impacts of construction if any (refer Annexure 6). A summary of the consultations held with stakeholders is presented as follows:

**Table 5: Stakeholder Consultations**

Summary of Stakeholder Consultations conducted at Industrial Housing Facility – Vallam Vadagal			
Total no. of stakeholders consulted – 13, Male – 7, Female - 6			
Category of Stakeholders consulted – Employees/Project Staff ([REDACTED] FMS), SIPCOT representatives, Residents			
S. No	Category of Stakeholder	Issues Discussed	Responses
1	Employees/Project Staff	<ul style="list-style-type: none"> <li>Proposed building operations</li> <li>Proposed facilities in the building</li> <li>FMS policies &amp; operations</li> <li>Proposed emergency preparedness</li> <li>Proposed operational maintenance and issues</li> <li>Proposed accommodation and transport facilities</li> </ul>	<p>It was learnt that operational issues will be recorded from the residents on a frequent basis and will be promptly resolved by the FMS staff.</p> <p>Female staff were accommodated in the building itself and necessary facilities will be made available to them.</p> <p>Based on the proposal overall satisfaction with the project is expected. The project will be having a robust system to record any complaints/grievances with respect to the project.</p>
2	SIPCOT Staff	<ul style="list-style-type: none"> <li>Construction of building</li> <li>Associated amenities</li> <li>Operations &amp; Maintenance</li> </ul>	<p>Construction related permits and issues were discussed</p> <p>Maintenance and procedure of handover details of the project were discussed.</p> <p>FMS handover of maintenance of the building and initial operational issues and challenges were</p>

			discussed.  No challenges were envisaged/reported from their end.
3	Residents	<ul style="list-style-type: none"> <li>• Overall satisfaction with the amenities of the building</li> <li>• Response of the FMS to any complaints</li> <li>• User satisfaction</li> </ul>	<p>The potential residents reported that they were very satisfied with proposed overall amenities and the facilities.</p> <p>They expected professional management and expressed high hopes about the proposed project.</p>

## B. Stakeholder Engagement Plan

24. Identification of the stakeholders is a key step towards developing the engagement strategy. The stakeholders identified shall include residents, workers from nearby industries, contractor(s), employees and representatives from nearby industries.

25. A Stakeholder Engagement strategy is to be established for the project which shall encompass a wide range of stakeholders (internal and external). A stakeholder engagement shall be conducted semi-annually and a notice shall be given to the participants at least 7 days prior to the consultation. The engagement strategy shall be a continual one with effective mechanisms established for managing the stakeholder relationships effectively. The following steps are outlined for an maintaining an effective engagement strategy.

- Maintain a detailed record of list of stakeholders which includes their roles, responsibilities and contact details.
- Establish clear communication channels and ensure that all the stakeholders are aware of the channels being used.
- Involving stakeholders in decision making process is crucial as it will incorporate multiple perspectives in increasing the efficiency of operations of the project.
- Regular monitoring and evaluation of the stakeholder satisfaction that shall help identify areas of improvement and address any concerns.

## V. GRIEVANCE REDRESSAL MECHANISM

26. A Grievance Redressal Mechanism (GRM) has been established for the project to ensure that necessary resolution is done to address the grievances and concerns of multiple stakeholders. The main objective of the GRM 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 Redressal Mechanism provided does not impede or replace the grievance resolution process offered by the legal system of the country.

27. The GRM is a three-level structure – a) Site Level b) Project Level and c) Fund Level. At each of the levels, a minimum of 3 officers shall be identified and their names and contact

details are to be displayed in both English and Tamil in the project.

#### **A. Level 1- Site Level**

28. At the site level, the facility operator has identified 2-3 grievance redressal officers and their names and contact details are displayed at prominent locations across the site, in both English and Tamil. At the site level, the site level Grievance Redressal Officer (GRO) shall be appointed/nominated.

29. **Record all the grievances registered at the site.** All grievances shall be recorded in a database along with an identification number and communicated to the aggrieved party as an acknowledgement.

- a. Grievances shall be redressed within 7 days from the date of lodging the grievance.
- b. If grievance is unaddressed, the site will refer it to the project level GR committee.
- c. The grievance log will be shared by the site level GRO with the project level and the fund level GRO on a fortnightly basis.

#### **B. Level 2 – Project Level**

30. At the project level, the project proponent (TNIHPL) will be responsible for handling grievances. They representatives from TNIHPL will

- a. Record, categorize and prioritize the grievances received
- b. Consult with all relevant stakeholders
- c. Visit the project site regularly and closely monitor the project
- d. Settle the grievances in consultation with the complainant and the project staff
- e. Report to the aggrieved parties about the resolution
- f. Forward the unresolved cases to higher authorities for resolution

#### **C. Level 3 – Fund Level**

31. At the Fund level, the grievance redressal officer along with the ESG & Investment analyst shall handle the grievances at the fund level. All grievances that are unresolved at the project level shall be addressed by the fund level within 14 days from receipt.

#### **D. Procedure**

32. **Step 1 – Nomination of Site Level GRO and Management Level GRO:** A nodal site level GRO and a Management level GRO is to be nominated in consultation with the project lead and ESG team of TNSF. A rapid review of contentious issues/disputes related to the project based on the existing issues and the current status of the project shall be conducted together.

- a. The review will map the key stakeholders corresponding to the issues and will feed the nature of the debate (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.
- b. The names, positions/designations, contact numbers and email of the site level,



project level and fund level GROs is to be displayed prominently in local language as well as in English, at the entrance of the project site.

**33. Step 2 – Recording 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 channel should be publicized and advertised at the site and on the website of the promoter and the fund.
- 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. A central log of all the grievances received through the above means will be maintained by the site-Level GRO, in an excel file.
- c. 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.

**34. Step 3: Resolution of grievances and complaints.** The following steps will be followed to resolve the grievances at the site level.

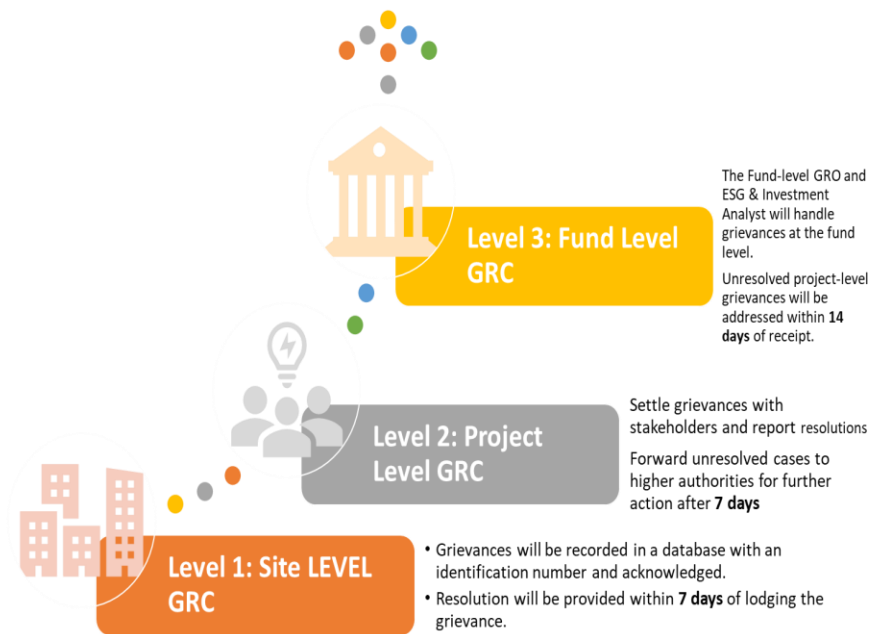
- a. Grievances will be categorized by the Site Level GRO as high, medium and low priority according to the type of issue raised (e.g. physical and economic displacement, grievance from indigenous population (the future residents), inconvenience caused by vehicular movements, accidents, near-misses, pollution, etc.) and the impact of the project on the environment/aggrieved party.
- b. Based on this categorization and seriousness of the issue raised, the Site Level GRO will prioritize the complaints for appropriate follow up action
- c. 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
  - Grievance and complaints received from investors
  - The names displaying the Grievance Committee Members at Project and Site Level
- d. The Site GRO will review the grievances / complaints received and direct it to the appropriate function/ department for necessary action, keeping the project site head/ in-charge in loop.
- e. It is anticipated that the majority of issues raised will be informational in nature or feedback that requires small course corrections; these should generally be handled at the site by the representatives of project owner.
- f. Issues having to do with governance will be addressed at the SPV level, with the involvement of the SPV GRO.
- g. The Site Level GRO will be accountable for the timely closure of all the grievances received from the external stakeholders at the site and those affected by the project at project site.
- h. The Site Level GRO will communicate the response and action taken to the aggrieved party and obtain their acknowledgement.
- i. Basis the acknowledgement received from the aggrieved party, the Site Level

- GRO will close the complaint in the grievance log.
- j. The grievance log will be shared by the Site Level GRO with the SPV Level GRO and Project Lead of TNSF on fortnightly basis.
  - k. The grievance log will also be included in the quarterly project progress reports submitted to TNSF's ESG Team.
  - l. The Project Lead in consultation with the Site Level GRO, SPV Level GRO and Fund Level GRC will ensure that all the grievances are closed within the quarter.

**Table 6: Grievance Rationale**

Category	Rationale
High	Any grievance that can have an impact beyond the project period and its impact may be irreversible if not addressed immediately
Medium	Grievances where the impact is fairly moderate and can be reversed with corrective measure
Low	Grievances which are short-term and can be resolved through bare minimum or minor corrections

**Figure 4: Grievance Redress Mechanism – Flow Diagram**



35. **ADB's Accountability Mechanism** - If the established GRM is not able 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.

36. **Periodic review and documentation of lessons learned** - The site level GRM will periodically review the functioning of the GRM and record information on the effectiveness of the mechanism, especially on the program's ability to prevent and address grievances.

37. **Costs.** All costs involved in resolving the complaints (meetings, consultations, communication and reporting/ information dissemination) will be borne by the SIPCOT.

## VI. CONCLUSION

38. Based on a detailed social due diligence of the project and its activities, which involved primary site visits and a thorough desk review, the project social and governance related risks and mitigation measures were identified and appropriate mitigation measures have been suggested for the project. The key observations for the project are summarized as follows:

39. Based on the due diligence, no major social safeguards risks are assessed or determined for the project. No concerns are noted with respect to the land acquisition as the land is owned by SIPCOT and the same has been leased to Foxonn for a 99-year lease. Further, the social due diligence confirms that:

- **The lease deed executed between SIPCOT and [REDACTED] will be shared in the upcoming safeguards monitoring report/s.**
- There is no involuntary resettlement impact of the project as the land proposed for development of the project infrastructure is vacant, not used for any productive purpose by any individual or community or institution. No land acquisition related issues or related legacy issues is involved for the project site.
- The land was a vacant land and there is no human habitation, trees or any other establishments on the proposed project site. As a result, no physical displacement, demolition of houses or structures will be required due to the construction activities.
- The project does not have any direct or indirect impact on the indigenous people including to their dignity, human rights, livelihoods, territories, or the natural and cultural resources associated with indigenous peoples or their ancestral domains and assets.
- No potential negative impacts have been identified for this project.
- Training of project staff on the key points of the Environmental and Social Action plan by the project developer.
- The project will implement a comprehensive stakeholder engagement plan and for smooth disclosure and sharing of information. Stakeholder consultations were held with the inhabitants and the facility management service team. Stakeholder consultations during the O&M stage will be carried out bi-annually with users of the facility, O&M operators, and local communities. The consultations will be presented in subsequent SSMRs.

### Annexure 1: Historical Timeline













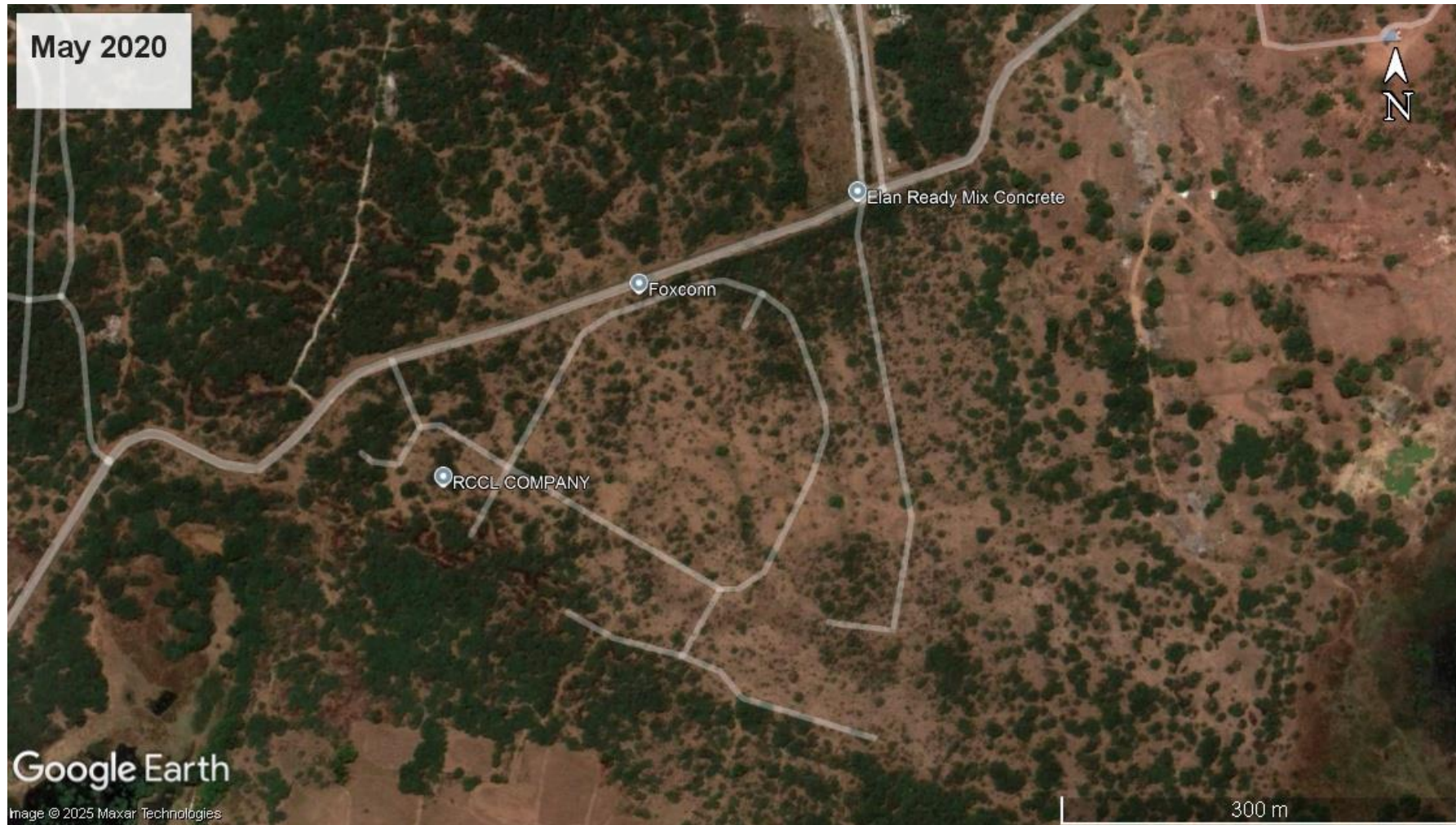






















## Annexure 2: Land Ownership Details

Page - 1

**Sriperumbudur Expansion (Vallam - Vadagal) Scheme****Unit-VI Block - V****LAND DELIVERY RECEIPT**

Name of the Village : Vallam 'B'  
 Name of the Taluk : Sriperumbudur  
 Name of the District : Kancheepuram

Sl. No.	Survey No.	Extent in Hectares	Boundaries				Trees / Structure if any
			North By Survey No.	South By Survey No.	East By Survey No.	West By Survey No.	
1.	294	7.09.5	272	Mettupalayam Village	271	293	
2.	295	2.57.5	271	Mettupalayam Village	296	294	
	TOTAL	9.67.0					

The above lands have been taken possession by me on 13.05.2013 in the presence of

Handed Over by

*[Signature]*  
 சாரர் ஆய்வாளர்  
 சிப்காட், அலகு-6(30)  
 திருப்பெரும்புதூர் வட்டம்.

Witness

*[Signature]*  
 தலைவர்  
 திருப்பெரும்புதூர் வட்டம்.

Taken over by

*[Signature]*  
 சாரர் ஆய்வாளர்  
 சிப்காட், அலகு-6(30)  
 திருப்பெரும்புதூர் வட்டம்.

Handed Over by

*[Signature]*  
 சாரர் ஆய்வாளர்  
 சிப்காட், அலகு-6(30)  
 திருப்பெரும்புதூர் வட்டம்.

Taken over by

*[Signature]*  
 13/5/13.

*[Signature]*  
 தலைவர்  
 சிப்காட், அலகு-6  
 திருப்பெரும்புதூர் வட்டம்.

Taken over by,

*[Signature]*  
 13/5/13  
 ASSISTANT MANAGER (CIVIL)  
 SIPCOT PROJECT OFFICE  
 SRIPERUMBUDUR-602 105

**Transcript of Land Ownership Details Page – 1****Handed over by:**

Village Administrative Officer  
(VAO), Vallam  
Village B Grade,  
Sriperumbathur Taluk

**Witness:**

Village Assistant ,  
Vallam-B Grade

**Taken over by:**

Sub Inspector i/c., SIPCOT,  
Unit 6, Sriperumbathur  
Development Scheme,  
Sriperumbathur.

**Handed over by:**

Sub Inspector i/c., SIPCOT,  
Unit 6, Sriperumbathur  
Development Scheme,  
Sriperumbathur.

**Witness:**

S. Sangeetha (Agri)

**Taken over by:**

Special Tahsildhar, (Land  
Acquisition), SIPCOT, Unit  
6, Sriperumbathur  
Development Scheme,  
Sriperumbathur.

Assistant Manager Civil,  
SIPTCOT Project Officer,  
Sriperumbathur.



## Land Ownership Details

**Page - 2**

### Sriperumbudur Expansion (Vallam – Vadagal) Scheme

### Unit-VI Block – VI

## LAND DELIVERY RECEIPT

Name of the Village : Vallam 'B'  
Name of the Taluk : Sriperumbudur  
Name of the District : Kancheepuram

Sl. No.	Survey No.	Extent in Hectares	Boundaries				Trees / Structure if any
			North By Survey No.	South By Survey No.	East By Survey No.	West By Survey No.	
1.	296	3.17.5	270	209	297	295	
2.	297	5.47.5	270,268	Mettupalayam Village	298	296	
	TOTAL	8.65.0					

The above lands have been taken possession by me on 27.05.2013 in the presence of

Handed Over by

கிராம நிர்வாக அலுவலர்  
வல்லம் ஆ கிராமம்,  
திருப்பெருங்குடி அலுவலர் அலுவலம்

Witness

G. Vagabundus.  
Dyav 28/2000  
Znave 'B'

Taken over by

சார் ஆய்வாளர்  
சிப்காட், அகௌ-6 (51)  
திருப்பெரும்புதூர் விளிவாக்கத் திட்டம்  
திருப்பெரும்புதூர்

Handed Over by

சார் ஆய்வாளர்  
சிப்காட், அககு-6(11c)  
திருப்பெரும்புதூர் விரிவாக்கத் திட்டம்  
திருப்பெரும்புதூர்

Taken over by

Fr. Fr. Sagar (AGRI)  
13/5/13

தனிவட்ட ஆட்சியர் (நி.எ)  
 சிப்பந்த அலுவல் - 6  
 கிருப்பெரும்புதூர் விலாக்கம் திட்டம்  
 கிருப்பெரும்புதூர்

JUNIOR ENGINEER  
 SIPCOT PROJECT OFFICE  
 SRIPERUMBUDUR-602 105

**Transcript of Land Ownership Details Page – 2****Handed over by:**

Village Administrative Officer  
(VAO), Vallam Village B Grade,  
Sriperumbathur Taluk

**Witness:**

Village Assistant, Vallam-B  
Grade

**Taken over by:**

Sub Inspector i/c., SIPCOT,  
Unit 6, Sriperumbathur  
Development Scheme,  
Sriperumbathur.

**Handed over by:**

Sub Inspector i/c., SIPCOT,  
Unit 6, Sriperumbathur  
Development Scheme,  
Sriperumbathur.

**Witness:** S. Sangeetha (Agri)**Taken over by:**

Special Tahsildhar, (Land  
Acquisition), SIPCOT, Unit 6,  
Sriperumbathur Development  
Scheme, Sriperumbathur.

Junior Engineer, SIPCOT  
Project Officer,  
Sriperumbathur.

### Annexure 3: Involuntary Resettlement Impact Assessment with COVID-19 Screening Checklist

#### 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: Kanchipuram

Location (km): ~24 Km from district headquarters

Civil work dates (proposed):

Technical description: The project involves construction of thirteen blocks with a S+10 level structure and a total capacity of 18,720 beds.

#### Screening Questions for Involuntary Resettlement Impact

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

#### Screening Questions for Involuntary Resettlement Impact

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
<b>Involuntary Acquisition of Land</b>				
1. Will there be land acquisition?		√		The land has been allocated for the purpose of industrial housing. The land is currently in the possession of SIPCOT and has been leased to [REDACTED] for a period of 99 years.
2. Is the site for land acquisition known?				Not applicable as there will be no land acquisition.
3. Is the ownership status and current usage of land to be acquired known?				Not applicable as there will be no land acquisition.
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.

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
8. Will there be loss of businesses or enterprises due to land acquisition?				Not applicable, as there will be no land acquisition
9. Will there be loss of income sources and means of livelihoods due to land acquisition?				Not applicable, as there will be no land acquisition. The site is not being used for any productive purposes.
<b>Involuntary restrictions on land use or on access to legally designated parks and protected areas</b>				
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?		√		
<b>Information on Displaced Persons:</b>				
Any estimate of the likely number of persons that will be displaced by the Project?				[ ] No
[ ] Yes [√] N/A				
If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks?				[ ] No
[ ] Yes [√] N/A				
Are any displaced persons from indigenous or ethnic minority groups?				[ ] No
[ ] Yes [√] N/A				

#### **Annexure 4: Indigenous People Impact Assessment with COVID-19 Screening Checklist**

##### **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: Kancheepuram District

Location (km): 24 Km from the District Headquarters

Civil work dates (proposed):

Technical description: The project involves construction of thirteen blocks with a S+10 level structure and a total capacity of 18,720 beds.

### Screening Questions for Indigenous People Impact

KEY CONCERNS (Please provide elaborations in the "Remarks" column)	YES	NO	NOT KNOWN	Remarks
<b>A. Indigenous People Identification</b>				
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?		√		As per the census report of 2011 for Kanchipuram district, the total population is 39,98,252 of which only 1.03% of the population belong to the scheduled tribe community <sup>4</sup> . Further the district does not have any scheduled areas under the Indian constitution. The land for the Industrial Housing Facility is 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.
2. Are there national or local laws or policies as well as anthropological researches/studies that consider these groups present in or using the project area as belonging to "ethnic minorities," scheduled tribes, tribal people, national minorities, or cultural communities?				Not applicable.
3. Do such groups self-identify as being part of a distinct social and cultural group?				Not applicable.
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,				Not applicable.

<sup>4</sup> <https://censusindia.gov.in/nada/index.php/catalog/45355>

KEY CONCERNS (Please provide elaborations in the "Remarks" column)	YES	NO	NOT KNOWN	Remarks
excluded, and/or discriminated against?				
8. Are such groups represented as "indigenous people," "ethnic minorities," "scheduled tribes," or "tribal populations" in any formal decision-making bodies at the national or local levels?				Not applicable.
<b>B. Identification of Potential Impacts</b>				
9. Will the project directly or indirectly benefit or target indigenous people?		√		
10. Will the project directly or indirectly affect indigenous people's 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?		√		
<b>C. Identification of Special Requirements</b>				
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?		√		

KEY CONCERNS (Please provide elaborations in the “Remarks” column)	YES	NO	NOT KNOWN	Remarks
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




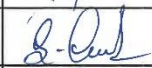






### Annexure 5: Stakeholder Consultation

Industrial Housing Project – Vallam Vadagal – Stakeholder Consultations at site level

#### Stakeholder Consultations at site level

Date	Stakeholders	Category of Stakeholder	No. of Participants			Issues discussed	Project responses
			Male	Female	Total		
28/02/2025	Pravin	SIPCOT Staff	1		1	Construction of building Associated amenities Operations & Maintenance	Construction related permits and issues were discussed
28/02/2025	Guna Sekhar		1		1		Maintenance and proposed handover details of the project were discussed.  FMS handover of maintenance of the building and initial operational issues and challenges were discussed.
28/02/2025	Dinusha	FMS Staff				Building operations	The process of recording of operational issues were discussed. The proposed methodology of resolving any issues promptly by the FMS staff.
28/02/2025	Tamil		1		1	Facilities in the building	
28/02/2025	Sindhija			1	1	FMS policies & operations	
28/02/2025	Preetha			1	1	Emergency preparedness	
28/02/2025	Abdul Rahman		1		1	Operational maintenance and issues	
28/02/2025	Kanaga Mani		1		1	Accommodation &	
28/02/2025	Hari Haran		1		1		
28/02/2025	Kaviya			1	1		
28/02/2025	Gopal		1		1		

Date	Stakeholders	Category of Stakeholder	No. of Participants			Issues discussed	Project responses
			Male	Female	Total		
						Transport	Female staff will be accommodated in the building itself and necessary facilities will be made available to them.
28/02/2025	Names undisclosed	Residents (2)				Overall satisfaction with the proposed amenities of the building. Proposed response mechanism as of the FMS team to any complaints	Probable residents reported that they were very satisfied with the proposed overall amenities in the building and the facilities.  They expressed positive anticipation about the mode of management by the the FMS team.

S. No	Name	Age	Profession	Contact Number	Signature
1.	Dhinusha	21	Executive Assistant		
2.	Pravin	27	Site Engineer	6369352848	
3.	Gunasekhar	27	Site Engineer	7418924854	
4.	Tamil (Foxcon)		Admin	7305616784	
5.	Sindhya (Foxcon)		CCTV operator	9345871779	
6.	Pooetha (Foxcon)		CCTV operator	6382141034	
7.	Abdul Rahman		Admin	7867949948	
8.	Kanaga Mani		Facility (MEP)		
9.	Hazi Hasan		Admin	9894241483	
10.	Kaniya		Admin	9339274581	
11.	Gopal	27	F&B Manager	6374957442	