Due Diligence Report

PUBLIC

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

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

Working Women's Hostel in St. Thomas Mount, Chennai

Prepared by Tamil Nadu Infrastructure Fund Management Corporation Ltd. (TNIFMC), Government of Tamil Nadu 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
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

CONTENTS

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 planning to invest in the construction of working women's hostels at proposed locations including St. Thomas Mount, Chennai. TNSF is committed towards integrating ESG into investee companies and the proposed project. As a part of process, TNIFMC has engaged KPMG Assurance and Consulting Services LLP, an independent consultant, to further conduct a due diligence of the proposed construction of working women hostel at St. Thomas Mount, Chennai, 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 proposed 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 proposed investment/target.

5. The scope of work is:

(i) Background check of project owner/– on corporate governance including policies and incidents related to anti-bribery and corruption, fraud, whistle-blower, diversity & inclusiveness, prevention of sexual harassment, child labor, forced labor, environment health and safety policies, governance structure, regulatory compliances, incidents against Key Management Personnel of the project owner/promoter/sponsor, their involvement in any criminal activities, etc.
(ii) On-site investigation with respect to:
    a. Past land use of the site and land acquisition/lease agreement review
    b. Whether there are any disputes/claims/arbitration in any court of law pertaining to the land and its potential impacts.

c. Whether there is any expected loss of agricultural or productive land due to this project
d. Surrounding land use
e. Area geology, and potential soil and groundwater contamination due to construction
f. Loss of biodiversity due to land clearing, waste disposal
g. Sources and availability of water (ground/surface),
h. Impact of construction and project on water availability in the locality
i. Potential impact on soil and water bodies nearby
j. Effluents – type and quantity of effluent generated during and post construction, 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.
k. Proximity to sensitive areas such as environmental, cultural, and heritage sites
l. Adverse impact of air, water, and aesthetic pollution on the neighborhood, environmental, cultural, and heritage sites due to project activity
m. Loss of accessibility to the local community
n. Past track record of the company – Have there been any serious environmental or social incidents in the past
o. Liabilities - project exposure to potentially significant environmental liabilities, such as those arising from land or groundwater contamination, related to the company's past or ongoing operations. Company exposure to potentially significant health and safety liabilities, such as those from ongoing or future claims from negatively affected workers and/or communities.

(iii) on-site consultations with relevant stakeholders such as the local community, key regulatory authorities, etc.

(iv) 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. To assess whether designs are certified by licensed structural engineers for their structural stability and safety including against seismic and wind forces.
e. Project-related regulatory documents – consents/ permits/ licenses obtained so far against those applicable for the project.
f. 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 safeguards compliance.
g. As per ADB safeguard requirements 1 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.
h. Review of any established baseline for air, water, and noise levels, common natural resources, livelihoods, social interactions, support systems, and other social and cultural characteristics by the project owner/promoter/sponsor.

i. Review of metrics or indicators to gauge the effectiveness of the stakeholder engagement process defined by the project owner.

j. 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

6. 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 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**: Conducted a half-day site visit at the project site in St. Thomas Mount, Chennai on 2nd November 2022 and multiple site visits conducted during the construction period.
(iv) **Stakeholder consultations**: Carried out discussions with the relevant project-related stakeholders like- the District Social Welfare Officer, an officer from govt. revenue department and residents to obtain additional information beyond the statutory documents-
    a. **Investee company (TNWWHCL)**
    b. **Relevant stakeholders at St. Thomas Mount, Chennai**
(v) **Reporting**: This report presents key ESG issues and risks and mitigation measures for high-risk issues.

7. This 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 people's 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 St. Mount Road does not trigger safeguards requirements 2 (involuntary resettlement) and safeguards requirements 3 (indigenous peoples) of ADB's Safeguards Policy Statement 2009.[1]

[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.

II. PROJECT OVERVIEW

A. About the project developer

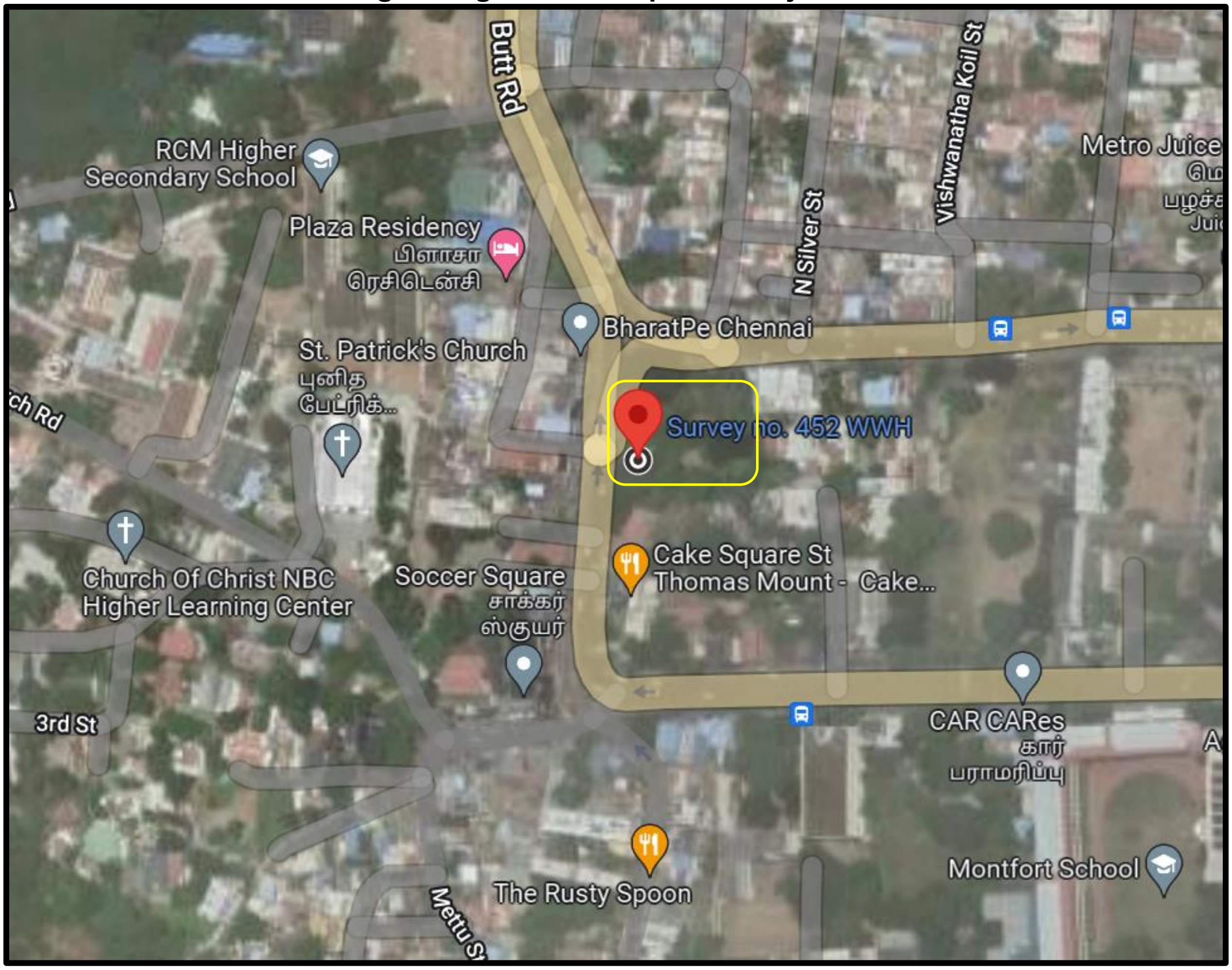
8. Tamil Nadu Working Women's Hostels Corporation Limited (TNWWHCL) was incorporated in 2020 under the Companies Act, 2013. TNWWHCL undertakes infrastructure development, management, and operations of working women hostels, senior living residences, etc. to provide safe, affordable accommodation across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

B. Description of the proposed project site

Parameters	Description
Project details	Construction of working women's hostel building. Total beds: 136
Location	The proposed project site is in St. Thomas Mount, Chennai district in Tamil Nadu
Survey no	According to the field measurement book, the survey number of the project site is 452. (Refer Appendix 7)
Total area	Site area: 1408 sq. Meter
Topography	The proposed land is uniform and almost rectangular in shape with a considerable number of trees and dense shrubs.
Present land use	During our site inspection, it has been observed that the property is currently unoccupied, filled with debris and bushes, and been used as a garbage dump by the neighbors. It is currently demarcated by compound wall construction throughout its boundaries.
Past land use	The lease agreement has been executed between the Social Welfare department, Government of Tamil Nadu and TNWWHCL for a period of 28 years. (Refer Appendix 11)
Boundary	Northern side: Residential area Southern side: Butt Road Eastern side: Vacant land (belonging to the govt.) Western side: House
Adjoining area	1. Muthoot Home finance (West side) 2. Commercial area with Bank, medical shop, bakery, saloon etc. (Opposite to the site) 3. Deputy Commissioner office (walkable distance)
Access road	The proposed project site has well-established access road.
Land acquisition	As per revenue records, the land is transferred to district social welfare department for the development of working women's hostel project as per the enter-upon document issued by the Chengalpattu Collectorate. (Refer Appendix 8) Subsequently, the land is leased to the TNWWHCL

	for a period of 28 years from the Social Welfare Department. (Refer Appendix 11).

Google Image of the Proposed Project Site



C. About the Site:

9. Proposed Site is a regular shaped vacant land parcel located along Butt Road, St. Thomas Mount Cantonment Area. The property has a frontage of about 92 feet approximately on the access road. St. Thomas Mount Bus Stop is at a walkable distance from the Proposed Site. In addition to this Alandur metro station connectivity nearby adds value to the property. Metro Corridor No. 5 is proposed along the Butt Road and has a station located in Butt Road.

10. Since the site is in the cantonment area, permission to develop and construct a hostel in the area has been submitted to the office of the cantonment Board and the acknowledgement has been obtained. (Refer Appendix 9, 10).

11. The proposed site measures about 1,408 sq. mtr. as per site survey. The property can be directly accessed from Binny Road (known as Guindy – Poonamallee Road) which is 40 feet wide. During the initial site inspection, it was observed that the property was unoccupied, filled with debris and bushes, and was used as a garbage dump by the neighbors. It is now demarcated by

compound wall construction throughout its boundaries. The construction work has been completed, and the project is operational.

D. Land Ownership

12. The land belongs to the Social Welfare and Women Empowerment (SW&WE) department of Tamil Nadu (Ref Appendix 9). The government order to build the hostel and land ownership to the SW&WE department was announced in July 2021. The land is leased to TNWWHCL, and the land lease documents were executed in August 2025 (Appendix 11).

E. ADB Safeguard Requirements

13. 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	• 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.

F. Consultations

14. Discussions were held with the shop owners and neighbors around the site on the site along with the District Social Welfare Officer (Chennai) on 10.11.2022. The discussion revolved around 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.

15. On 10.02.2025 discussions were held with nearby shop owners, laborers, plumbers, electricians, PMC, PMU. Prior to the release of project funds, a comprehensive stakeholder consultation was conducted. This included key participants such as workers, plumbers, electricians, and representatives from the Project Management Consultant (PMC). As the project was nearing completion, discussions focused on worker safety training, working conditions, and the safety practices implemented on-site.

16. In addition, potential impacts on the neighboring community were addressed through conversations with nearby shop owners. These discussions explored any inconveniences caused by construction activities and the consultation also gathered feedback on the public’s perception of the project, including its overall usefulness and community benefits.

17. On 27 July 2025 discussions were held with the Residents of the hostel, Hostel manager, Food service provider. The consultation was conducted to assess the living conditions and service quality within the hostel premises. The discussion involved hostel residents, the hostel manager, and the food service provider. Residents shared feedback on accommodation standards, cleanliness, and safety measures, while also highlighting areas for improvement. The hostel manager addressed operational concerns and outlined ongoing efforts to enhance resident welfare. The food service provider participated in discussions around meal quality, dietary preferences, and hygiene practices. The consultation aimed to ensure that all stakeholders' perspectives were considered to foster a safe, comfortable, and well-managed living environment.

18. Consultation details and photographs are given in Appendix 5.

III. KEY FINDINGS SECTION

A. Social

S. No	Topic	Key findings
S.1	Safety & security	The project site is located on government-owned land and enclosed by a Home and another vacant land on both sides. There are a considerable number of residences on the back side of the proposed project site. Based on the interaction with DSWO, no safety and security concerns have been reported. Hence the overall risk is considered as low. From the safety and security of workers' perspectives, the site will be manned by security guards 24*7. The contractor will be responsible for ensuring the overall health & safety of all the workers, and maintenance of labor camps.
S.2	Community concerns	Based on the interactions with the DSWO, the response towards the upcoming project was generally positive and no immediate concerns were raised by the community.
S.3	Past legal non-compliance	This is a greenfield project and construction activity has not started yet. Hence the project has no legal non-compliance so far. The same was confirmed during the interaction with the DSWO. The project has obtained all the relevant pre-construction regulatory approvals and the project's construction is completed. The land-lease has been leased to the TNWWHCL in Appendix 11.
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.	There is an existing ROW.
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 person shall be displaced. The project site is also not agricultural land or has any commercial activity being carried out which can lead to loss of income.

B. Governance

S. No	Topic	Key findings
G.1	Corporate level governance policies on: • 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 & anti-corruption, forced/ compulsory labor, child labor, whistleblower, grievance redressal, and equal opportunity. The same would be applicable to the contractors working on the site as well. Crucial policies which are not currently in place include the Prevention of Sexual Harassment (POSH) of women and Health & safety policy.

S. No	Topic	Key findings
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 namely external stakeholders at the project site, those affected by the project, and the investors of the Fund. The grievances can be received by any or all the following means: phone, post/courier, SMS, webpage, or face-to-face. A Grievance Register (GR) will be maintained at the main security gate of the site and at Project Site Office for recording the grievances. The site should 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.
G.3	Monitoring and reporting	As understood during the interactions, TNWWHCL in coordination with PMC will conduct internal environmental monitoring, and compliance review and prepare Quarterly Progress reports for the project site. All applicable legal requirements are identified and documented in the EMP. The contractor will be responsible for obtaining permissions and licenses.
G.4	Contractor management	TNWWHCL in coordination with PMC has developed and documented pre-qualification criteria for the selection of contractors. As mentioned in the tender document, the contractor is responsible for preparing standard operating procedures for the execution of work on the project site.
G.5	Stakeholder engagement	The company has engaged with the local panchayat and is in the process of getting the necessary approvals as required. During the visit, the residents responded positively to the project. Multiple stakeholder consultation were held during the course of the project. The public consultations included consultations with the laborers, neighboring communities, PMC, PMU, and contractors. (Refer Appendix 5).
G.6	Consents/permits/clearances	The land lease agreement is executed for a period of 28 years to the TNWWHCL. The building plans, however, have been approved by CMDA. Environmental clearance is not required for the project.
G.7	Adverse media articles	No adverse media article was found during the desktop research.

IV. 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 29.41% 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 in Appendix 12.

V. GRIEVANCE REDRESS MECHANISM

21. 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.

22. **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.

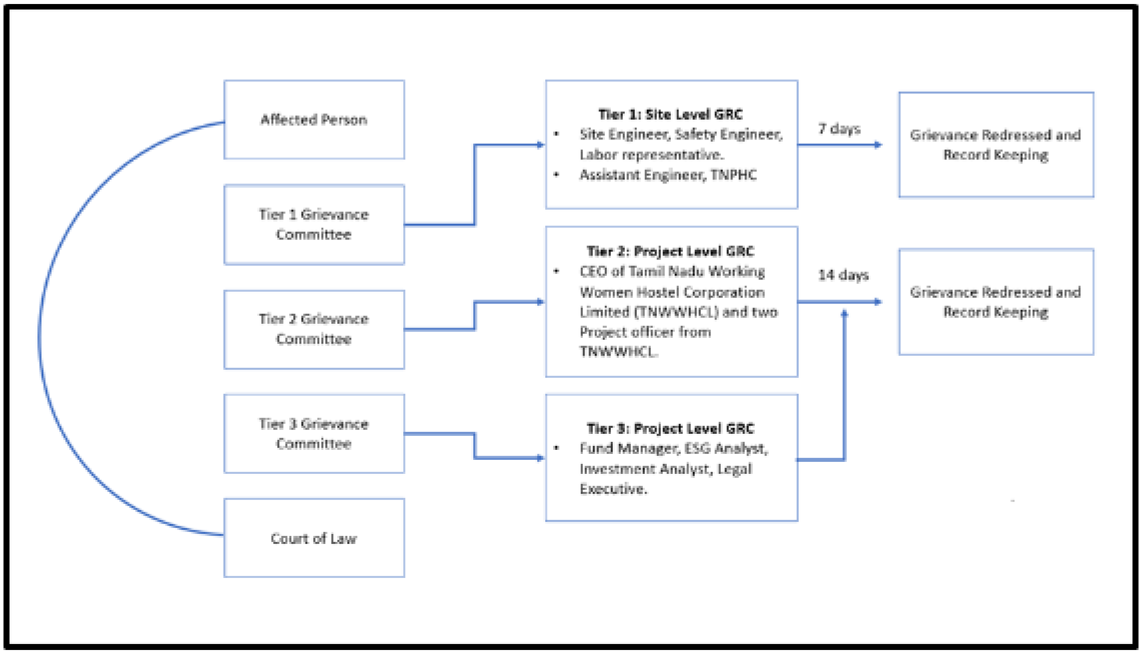
23. **Subproject level**. All grievances that cannot be redressed within 7 days on-site level will be brought to the notice of the subproject level, tier 2 GRO officer. The subproject GRO-2 will resolve the grievance within 14 days of receipt of a complaint/ grievance with support of safety engineers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

24. **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.

25. 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.

26. **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.

27. **GRM Structure**: The project had a functioning GRM structure and was applicable to the project throughout the construction period. The GRM structure is given below.


Affected Person
Tier 1 Grievance Committee
Tier 2 Grievance Committee
Tier 3 Grievance Committee
Court of Law
Tier 1: Site Level GRC
• Site Engineer, Safety Engineer, Labor representative.
• Assistant Engineer, TNPHC
Tier 2: Project Level GRC
• CEO of Tamil Nadu Working Women Hostel Corporation Limited (TNWWHCL) and two Project officer from TNWWHCL.
Tier 3: Project Level GRC
• Fund Manager, ESG Analyst, Investment Analyst, Legal Executive.
7 days
14 days
Grievance Redressed and Record Keeping
Grievance Redressed and Record Keeping

VI. CONCLUSION

28. The Due Diligence study reveals that the potential impacts during the construction and operational phase of the project are very much understood and manageable i.e., Impacts can be avoided or minimized. The proposed working women’s hostel is a green field project. The land for the project was unused land and there were no trees on the site. The land transfer is complete and the ownership lies with the Department of Social Welfare and Women Empowerment, Government of Tamil Nadu. The site does not have any ongoing disputes/ claims/ arbitrations. There was no physical and/or economic displacement of people. The project site is not located in environmentally or culturally sensitive areas.

29. The company has got all the necessary corporate governance policies and management systems in place. From the corporate governance point of view, no major gaps were identified.

30. 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).

31. The 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 people’s 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 St. Thomas Mount does not trigger safeguards requirements 2 (involuntary resettlement) and safeguards requirements 3 (indigenous peoples) of ADB’s Safeguards Policy Statement 2009.

Appendix 1: Photographs of the Project Site

Appendix 2: List of Documents Reviewed

1. Field Measurement Book (FMB) Sketch
2. Enter upon document (12248/2020/3) dt. 19/07/2021
3. Development proposal submitted by client to the cantonment board, ref no. 109/ TNWWHCL/ PH-2/ 2022-23, dt. 25th April 2022
4. Acknowledgement from the cantonment board on the above letter, dt. 17th May 2022

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: St. Thomas Mount, Chennai District
Civil work dates (proposed):
Technical description: The project involves the construction of a G+4 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				
		✓		The land will is transferred to the social welfare dept and leased to TNWWHCL. Hence, no land acquisition is required.
				Not applicable
Is the ownership status and current usage of land to be acquired known?				The land is currently owned by the social welfare department.
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?				No loss of crops due to land acquisition.
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?		✓		

Probable involuntary resettlement effects	Yes	No	Not Known	Remarks
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: St. Thomas Mount, Chennai District
Civil work dates (proposed):
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?		✓		According to the 2011 census, only 0.22% of the total population belongs to scheduled tribes and additionally the project area does not have any scheduled areas under the Fifth Schedule of the Indian Constitution. Hence, IP impact is not expected on the project site and the land is 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.
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				Not Applicable

Key concerns (Please provide elaboration in the 'Remarks' column)	Yes	No	Not Known	Remarks
a distinct social and cultural group?				
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
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' 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?		✓		

Key concerns (Please provide elaboration in the 'Remarks' column)	Yes	No	Not Known	Remarks
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: Consultations

Brief Minutes of Discussions Held

Names of members present	Anushya, District Social Welfare Officer (DSWO), Chennai Pruthvi, ESG Consultant, TNIFMC. Local shop owners around the site and neighbors
Date and time	10/11/2022 & 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.

Names of members present	Nearby shop owners, laborers, plumbers, electricians, PMC, PMU.
Date and time	10/02/2025 & 10:30 AM
Details of discussions held	Prior to the release of project funds, a comprehensive stakeholder consultation was conducted. This included key participants such as workers, plumbers, electricians, and representatives from the Project Management Consultant (PMC). As the project was nearing completion, discussions focused on worker safety training, working conditions, and the safety practices implemented on-site. In addition, potential impacts on the neighbouring community were addressed through conversations with nearby shop owners. These

	discussions explored any inconveniences caused by construction activities and the consultation also gathered feedback on the public's perception of the project, including its overall usefulness and community benefits.

Names of members present	Residents of the hostel, Hostel manager, Food service Provider
Date and time	26/07/2025 & 07:00 PM
Details of discussions held	A stakeholder consultation was conducted to assess the living conditions and service quality within the hostel premises. The discussion involved hostel residents, the hostel manager, and the food service provider. Residents shared feedback on accommodation standards, cleanliness, and safety measures, while also highlighting areas for improvement. The hostel manager addressed operational concerns and outlined ongoing efforts to enhance resident welfare. The food service provider participated in discussions around meal quality, dietary preferences, and hygiene practices. The consultation aimed to ensure that all stakeholders' perspectives were considered to foster a safe, comfortable, and well-managed living environment.

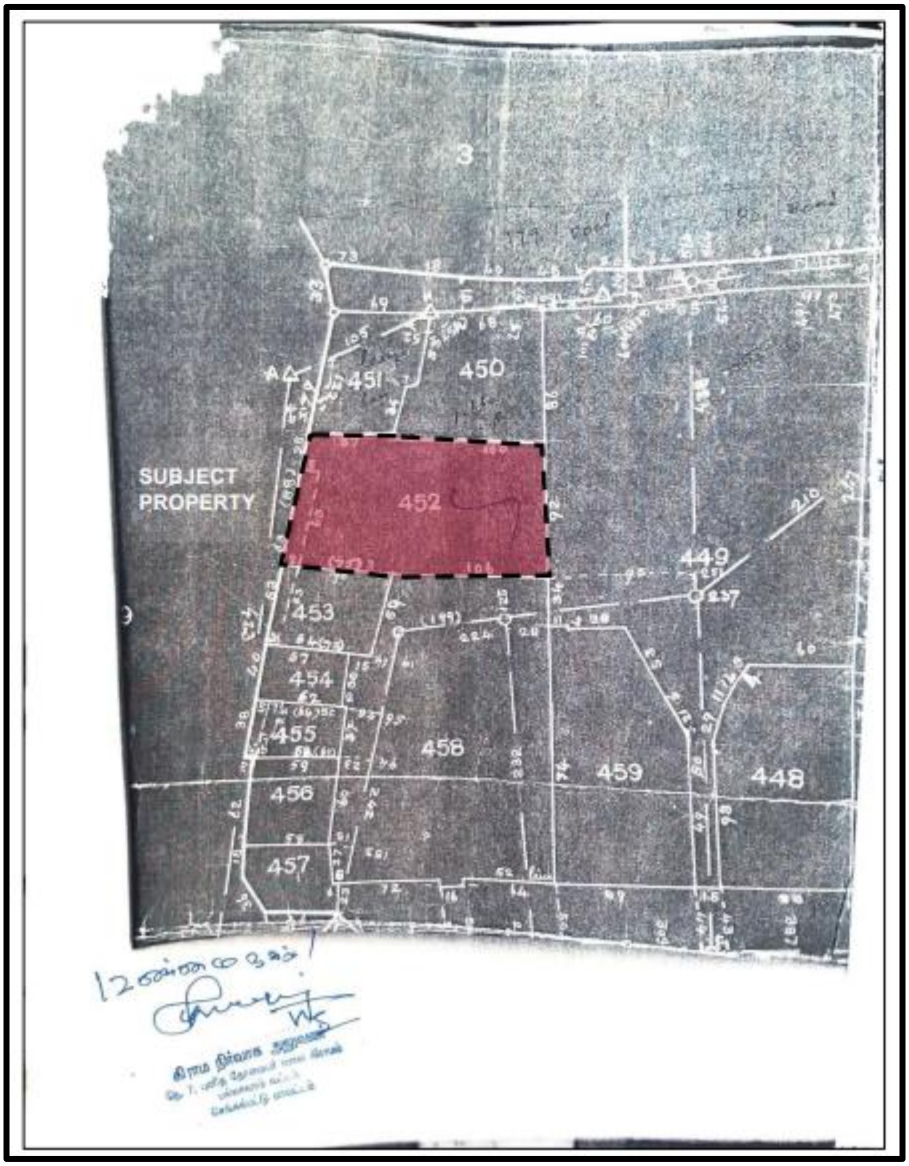
Appendix 6: Sample grievance registration form
(To be made available in Tamil and English)

(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	• 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 recoding the grievance would like to identity himself/ herself confidentiality	**[ ]** Yes **[ ]** 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	

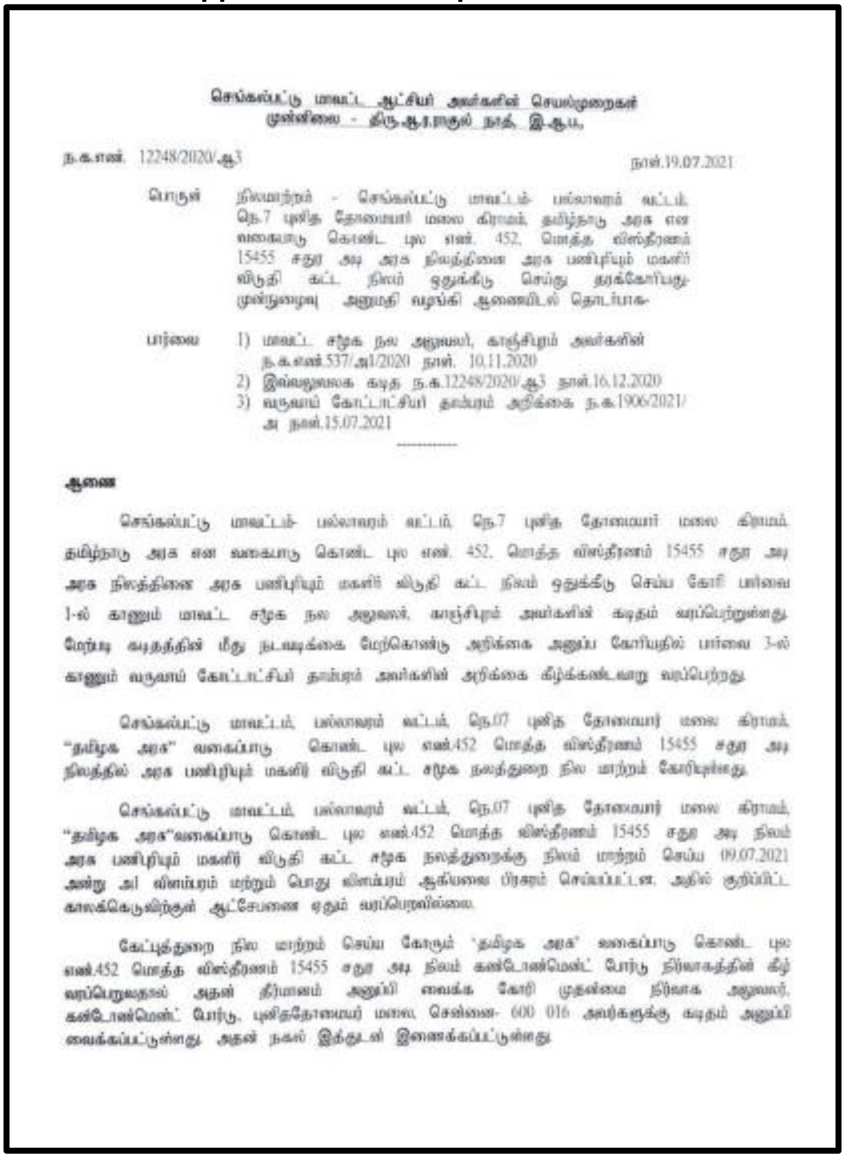
Tamil Form:

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

Appendix 7: Field Measurement Book



Appendix 8: Enter upon document[2]



செங்கல்பட்டு மாவட்ட ஆட்சியர் அவர்களின் செயல்முறைகள்
முன்னிலை - திரு.ஆ.ர.ராகுல் நாத், இ.ஆ.ப.,

ந.க.எண். 12248/2020/ஆ3 நாள்.19.07.2021

பொருள் நிலமாற்றம் - செங்கல்பட்டு மாவட்டம்- பல்லாவரம் வட்டம், நெ.7 புனித தோமையார் மலை கிராமம், தமிழ்நாடு அரசு என வகைபாடு கொண்ட புல எண். 452, மொத்த விஸ்தீரணம் 15455 சதுர அடி அரசு நிலத்தினை அரசு பணிபுரியும் மகளிர் விடுதி கட்ட நிலம் ஒதுக்கீடு செய்து தரக்கோரியது- முன்நுழைவு அனுமதி வழங்கி ஆணையிடல் தொடர்பாக-

பார்வை 1) மாவட்ட சமூக நல அலுவலர், காஞ்சிபுரம் அவர்களின் ந.க.எண்.537/அ1/2020 நாள். 10.11.2020
2) இவ்வலுவலக கடித ந.க.12248/2020/ஆ3 நாள்.16.12.2020
3) வருவாய் கோட்டாட்சியர் தாம்பரம் அறிக்கை ந.க.1906/2021/அ நாள்.15.07.2021

ஆணை

செங்கல்பட்டு மாவட்டம்- பல்லாவரம் வட்டம், நெ.7 புனித தோமையார் மலை கிராமம், தமிழ்நாடு அரசு என வகைபாடு கொண்ட புல எண். 452, மொத்த விஸ்தீரணம் 15455 சதுர அடி அரசு நிலத்தினை அரசு பணிபுரியும் மகளிர் விடுதி கட்ட நிலம் ஒதுக்கீடு செய்ய கோரி பார்வை 1-ல் காணும் மாவட்ட சமூக நல அலுவலர், காஞ்சிபுரம் அவர்களின் கடிதம் வரப்பெற்றுள்ளது. மேற்படி கடிதத்தின் மீது நடவடிக்கை மேற்கொண்டு அறிக்கை அனுப்ப கோரியதில் பார்வை 3-ல் காணும் வருவாய் கோட்டாட்சியர் தாம்பரம் அவர்களின் அறிக்கை கீழ்க்கண்டவாறு வரப்பெற்றது.

செங்கல்பட்டு மாவட்டம், பல்லாவரம் வட்டம், நெ.07 புனித தோமையார் மலை கிராமம், "தமிழக அரசு" வகைப்பாடு கொண்ட புல எண்.452 மொத்த விஸ்தீரணம் 15455 சதுர அடி நிலத்தில் அரசு பணிபுரியும் மகளிர் விடுதி கட்ட சமூக நலத்துறை நில மாற்றம் கோரியுள்ளது.

செங்கல்பட்டு மாவட்டம், பல்லாவரம் வட்டம், நெ.07 புனித தோமையார் மலை கிராமம், "தமிழக அரசு"வகைப்பாடு கொண்ட புல எண்.452 மொத்த விஸ்தீரணம் 15455 சதுர அடி நிலம் அரசு பணிபுரியும் மகளிர் விடுதி கட்ட சமூக நலத்துறைக்கு நிலம் மாற்றம் செய்ய 09.07.2021 அன்று அ1 விளம்பரம் மற்றும் பொது விளம்பரம் ஆகியவை பிரசுரம் செய்யப்பட்டன. அதில் குறிப்பிட்ட காலக்கெடுவிற்குள் ஆட்சேபணை ஏதும் வரப்பெறவில்லை.

கேட்புத்துறை நில மாற்றம் செய்ய கோரும் 'தமிழக அரசு' வகைப்பாடு கொண்ட புல எண்.452 மொத்த விஸ்தீரணம் 15455 சதுர அடி நிலம் கண்டோன்மென்ட் போர்டு நிர்வாகத்தின் கீழ் வரப்பெறுவதால் அதன் தீர்மானம் அனுப்பி வைக்க கோரி முதன்மை நிர்வாக அலுவலர், கண்டோன்மென்ட் போர்டு, புனிததோமையர் மலை, சென்னை- 600 016 அவர்களுக்கு கடிதம் அனுப்பி வைக்கப்பட்டுள்ளது. அதன் நகல் இத்துடன் இணைக்கப்பட்டுள்ளது.

[2] The enter-upon document from the District Magistrate to the Social Welfare and Women Empowerment Department of Tamil Nadu is an official Tamil Nadu government order dated 19th July 2021 (Ref. No. 12248/2020-83), concerning the allocation of land for the construction of Working Women's Hostel in St. Thomas Mount.

Appendix 9: Development Proposal Submitted by the Client to the Cantonment Board

Tamil Nadu Working Women's Hostels Corporation Ltd.

CIN: U85300TN2020SGC134271

Ref.No. 109/TNWWHCL/PH-2/2022-23

25th April 2022

CANTONMENT BOARD
ST. THOMAS MOUNT
DAK RECEIPT

28 APR 2022

To,

Shri. C. Dinesh Kumar Reddy
Chief Executive Officer
Office of the Cantonment Board-St Thomas Mount cum Pallavaram
North Parade Road, St. Thomas Mount
Chennai – 600016

Sir,

Sub: Construction of working women hostel – St. Thomas Mount Cantonment area – Utilization on Proposed development– Reg.

Ref: 1. GO (Ms) No. 22, SW&NMP [SW3(1)] Department, dtd. 28.05.2019
2. Chengalpattu District Collector Lr. 12248/2020/R dtd. 19.07.2021
3. Contract Agreement with M/s Knight Frank India Pvt Ltd

The Department of Social Welfare and Women Empowerment, Government of Tamil Nadu operates multiple Working Women Hostels across the State to provide safe & affordable accommodation for all working women. In the reference 1st cited above, the Tamil Nadu Working Women Hostels Corporation Limited (TNWWHCL), which is a Special Purpose Vehicle (SPV) has been exclusively setup to build and operate good quality hostels across the State. The Government of Tamil Nadu has also announced setting-up of hostels in every district in the State to benefit all working women.

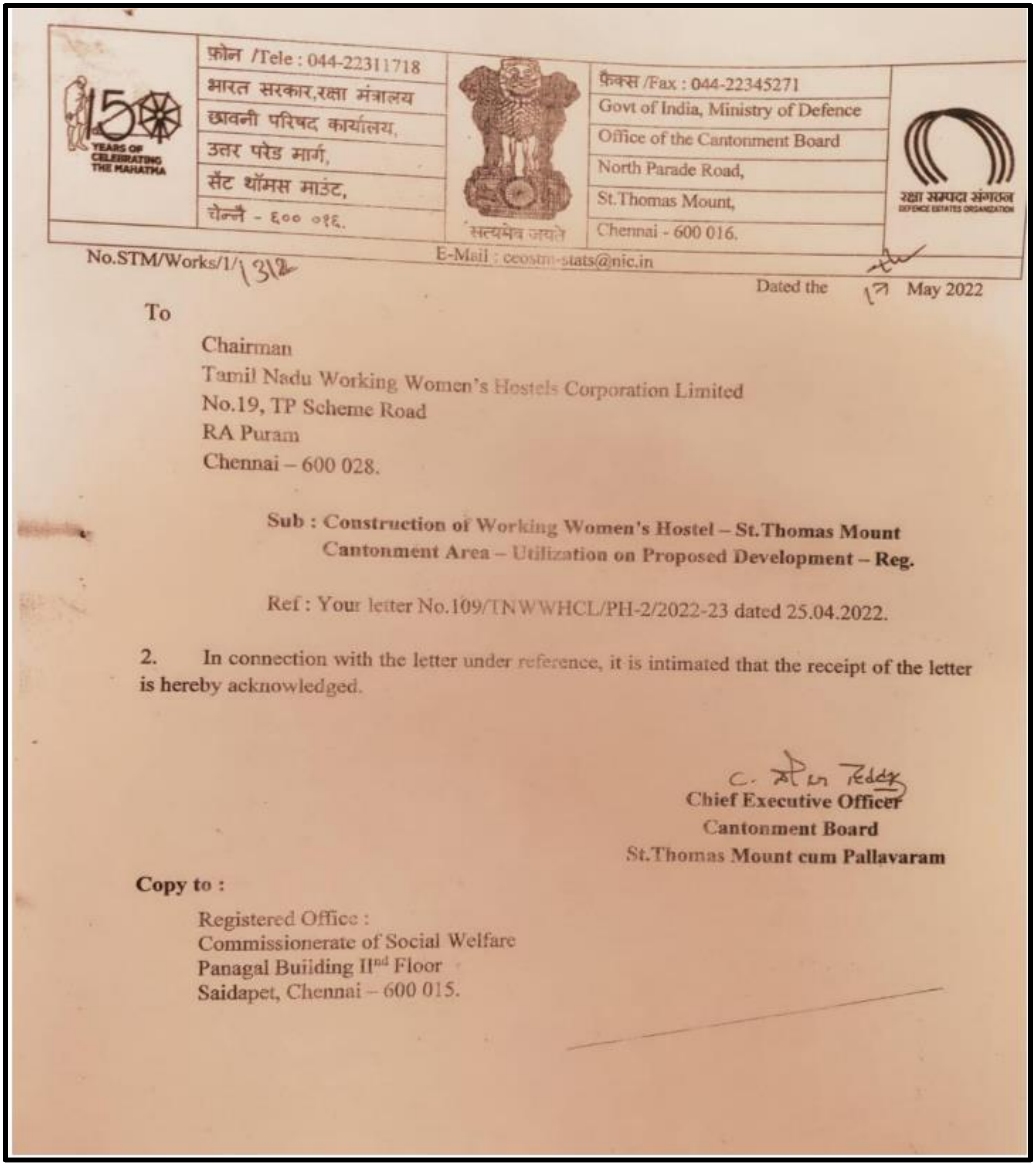
The Department of Social Welfare and Women Empowerment is in possession of a land in St Thomas Mount within Cantonment Area, measuring 15,455 sq.ft. (GPS coordinates - 13.008235, 80.196465) located in survey no. 452, St. Thomas Mount Village, Pallavaram Taluk, Chennai. This site was found feasible as per the Detailed Feasibility Study, done by International Property Consultant M/s Knight Frank India Pvt Ltd. Hence, the Department of Social Welfare and Women Empowerment has proposed to construct a working women hostel in this location.

However, in accordance with following rules and orders passed by various Government authorities, the department is exempted from seeking approval from the Local Municipal Body (Cantonment Board-St Thomas Mount cum Pallavaram) for construction of Government buildings. The rules and orders are listed below:

i. Section 3 of the Government Building Act, 1899 read with section 291 of the Cantonments Acts, 1924 and read with section 358 of the Cantonments Act, 2006

Admin Office : No.19, TP Scheme Road, RA Puram, Chennai – 600028. Phone : +91 44 24648409 Email : tnwwhcl@tnifmc.com
Regd Office : Commissionerate of Social Welfare, Panagal Building II Floor, Saidapet, Chennai 600 015

Appendix 10: Acknowledgement from Cantonment Board



फ़ोन /Tele : 044-22311718
भारत सरकार,रक्षा मंत्रालय
छावनी परिषद कार्यालय,
उत्तर परेड मार्ग,
सेंट थॉमस माउंट,
चेन्नै - ६०० ०१६.

सत्यमेव जयते

फ़ैक्स /Fax : 044-22345271
Govt of India, Ministry of Defence
Office of the Cantonment Board
North Parade Road,
St.Thomas Mount,
Chennai - 600 016.

E-Mail : ceostm-stats@nic.in

No.STM/Works/1/1312

Dated the 17 May 2022

To

Chairman
Tamil Nadu Working Women's Hostels Corporation Limited
No.19, TP Scheme Road
RA Puram
Chennai – 600 028.

Sub : Construction of Working Women's Hostel – St.Thomas Mount Cantonment Area – Utilization on Proposed Development – Reg.

Ref : Your letter No.109/TNWWHCL/PH-2/2022-23 dated 25.04.2022.

2. In connection with the letter under reference, it is intimated that the receipt of the letter is hereby acknowledged.

C. [signature] Reddy
Chief Executive Officer
Cantonment Board
St.Thomas Mount cum Pallavaram

Copy to :

Registered Office :
Commissionerate of Social Welfare
Panagal Building II[nd] Floor
Saidapet, Chennai – 600 015.

Appendix 11: Lease Agreement Registration Document

GOVERNMENT OF TAMILNADU

REGISTRATION DEPARTMENT

தமிழ்நாடு அரசு

பதிவுத்துறை

Certificate of Encumbrance on Property

சொத்து தொடர்பான வில்லங்கச் சான்று

S.R.O /சா.ப.அ: Chennai South Joint II	Date / நாள்: 18-Aug-2025

Document No.& Year/ஆவண எண் மற்றும் ஆண்டு: 2158/2025

<table>
<tr><th>Sr. No./ வ. எண்</th><th>Document No.& Year/ ஆவண எண் மற்றும் ஆண்டு</th><th>Date of Execution & Date of Presentation & Date of Registration/ எழுதிக் கொ டுத்த நாள் & தாக்க ல் நாள் & பதிவு நாள்</th><th>Nature/தன்மை</th><th>Name of Executant(s)/ எழுதிக் கொடுத்தவர்(கள்)</th><th>Name of Claimant(s)/எழுதி வாங்கியவர்(கள்)</th><th>Vol.No & Page. No/ தொகுதி எண் மற்றும் பக்க எண்</th></tr>
<tr><td rowspan="6">1</td><td>2158/2025</td><td>28-Jul-2025
28-Jul-2025
28-Jul-2025</td><td>குத்தகை ஆவணம்</td><td>1. தமிழ்நாடு அரசு சமுக நலஆணையர்(முத.)
சங்கீதா(முக.)</td><td>1. தமிழ்நாடு அரசு பணிபுரியும் மகளிர் விடுதிகள் கார்பரேஷன் லிமிடெட்(முத.)
பவன் ராமகிருஷ்ணா கைபா(முக.)</td><td>-</td></tr>
<tr><td colspan="2">Consideration Value/கைமாற்றுத் தொகை:
-</td><td colspan="2">Market Value/சந்தை மதிப்பு:
Rs. 28,000/-</td><td colspan="2">PR Number/முந்தைய ஆவண எண்:
-</td></tr>
<tr><td colspan="3">Schedule 1 Details:
Property Type/சொத்தின் வகைப்பாடு: Plot With Building</td><td colspan="3" rowspan="2">Survey No-Extent/புல எண்-விஸ்தீர்ணம்: 452 - 1569.0 SQUARE METRE</td></tr>
<tr><td colspan="3">Village & Street/கிராமம் மற்றும் தெரு: Parangimalai, Butt Road</td></tr>
<tr><td colspan="3">Old Door No./பழைய கதவு எண்: 7</td><td colspan="3"></td></tr>
<tr><td colspan="3">Boundary Details:
கிழக்கு - புல எண் 449, மேற்கு - புல எண் கிண்டி - பூந்தமல்லி ரோடு, வடக்கு - சர்வே எண் 451 மற்றும் 450, தெற்கு - புல எண் 453 மற்றம் 458</td><td colspan="3"></td></tr>
</table>

Number of Entries/பதிவுகளின் எண்ணிக்கை: 1

1

// 2 //

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

WHEREAS:

A. The Lessor, Commissioner of Social Welfare, is seized and possessed of or otherwise well and sufficiently entitled to the plot of landto be mentioned in the prescribed format of **Schedule "A" (collectively referred as "Said Land"),** hereunder written and delineated on the plan annexed hereto and shown with red colour boundary line thereon.

B. The Lessee, Tamil Nadu Working Women's Hostels Corporation Limited, is a Special Purpose Vehicle (SPV) promoted by the Department of Social Welfare, Government of Tamil Nadu and is engaged in the business of Development and Operation of Working Women Hostels and similar assets and possesses the requisite skills, expertise and financial ability required for the development of the Said Land.

C. The Lessor is now desirous to utilize the potential of the Said Land for developing and operating the Working Women Hostel through the Lessee and has accordingly agreed to lease the land to the Lessee, including agreed to grant the right to enter and all other incidental and related rights in respect of the Said Land in favor of the Lessee on the terms and conditions mutually agreed upon between the Parties.

D. Also, the Lessor has agreed to lease unto the Lessee the Said Land together with the right to construct a building or buildings and/or structures/ superstructures thereon, and the management, operations & maintenance of the same, including renting of the development or any part thereof to any party, for an initial period of 28 years, with the exclusive option to the Lessee to extend it for another 27 years, for a consideration, detailed herein below and upon the terms and conditions recorded herein.

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

NOW THIS AGREEMENT WITNESSETH AS FOLLOWS

மாவட்ட சமூக நல அலுவலர்
செங்கல்பட்டு மாவட்டம்.

Document No 2158 of 2025 of Book I contains 26 Sheets 2 Sheet

Registering Officer

For TNWWHCL

Chief Executive Officer

IN WITNESS WHEREOF the Parties hereto have executed these presents the day, month and year first hereinabove written.

SIGNED for and on behalf ofthe Lessor,

______________ [S. SANGEETHA]

By its authorized signatory

Mr./Mrs.______________,

SIGNED for and on behalf ofthe Lessee,

______________ [PAWAN RAMAKRISHNA KAIPA]

By its authorized signatory

Mr./Mrs.______________,

in the PRESENCE of

1. (SIVASUBRAMANIAN S)
2. (I. ALEX DEVARAJ)

SCHEDULE – A

DESCRIPTION OF THE SAID LANDS

All that piece and parcel of property as mentioned below:

Address of the property	Land area (Sq mt.)
Survey No. 452, No 7,St.Thomas Mount village, Butt Road, Chengalpattu District - 600016	1569

For TNWWHCL

Chief Executive Officer

மாவட்ட சமூக நல அலுவலர்
செங்கல்பட்டு மாவட்டம்.

Document No. 2158 of 2025 of Book
............contains 26 Sheets 17 Sheet

Registering Officer

K.N.SURESH
Document Writer
Licence No.A/92/96MS(S)
DoorNo.68Fanepet 2nd Street
Nandanam Chennai 600 035
(Cell No. 9841215502)

Appendix 12: 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.

Project Risk Rating		
	Risk Level (%)	*ESG Risk Rating*
	29.41	*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 5 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		No
	Disputes/ arbitrations/ claims related to land	Due Diligence	0	0	0		No
	Soil and ground water contamination	Due Diligence	1	3	4		Yes
	Loss of biodiversity due to land clearing	Due Diligence	0	1	1		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	41	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. Soil and groundwater contamination 2. Construction and other waste disposals 3. Sources and availability of water 4. Adverse impact due to air, water, noise, and aesthetic pollution on the environment, cultural & heritage sites due to construction activities 5. Availability and validity of the environmental clearance and other permits
Social	6. Non-compliance with labor laws 7. Safety and security
Governance	8. Corporate-level governance policies 9. Grievance redressal mechanism