

Due Diligence Report

Document Stage: Draft for Consultation
Project No: 53067-004
December 2022

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

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

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

Environmental, Social and Governance Due Diligence of Industrial Housing Project by Vidiyal Residency Pvt Ltd, Hosur, Krishnagiri district, Tamil Nadu

Document Stage: Draft for Consultation

Project No:

December 2022

Submitted by:



Environmental Management Centre LLP

1308, Wing B, Kohinoor Square, N. C. Kelkar Road, Shivaji Park,
Dadar (West), Mumbai 400 028

URL: www.emcentre.com

Prepared by:	Akshay S. Nare, Richa Thakur and Bhavnidhi Sood
Reviewed by:	Sivaranjani Subramanian
Approved by:	Prasad Modak

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Abbreviations

BMTPC	Building Materials and Technology Promotion Council	INR	Indian National Rupees
CPCB	Central Pollution Control Board	KWH	Kilo Watt Hour
BUA	Built-up Area	KVA	Kilo Volt Ampere
DG set	Diesel Generator set	KWH	Kilo Watt Hour
EIA	Environmental Impact Assessment	LPG	Liquified Petroleum Gas
E and S	Environmental and Social	NABL	National Accreditation Board for Testing and Calibration Laboratories
EHS	Environmental, Health and Safety	NOC	No Objection Certificate
EMC	Environmental Management Centre LLP	NGO	Non-Governmental Organization
EPF	Employee Provident Fund	OHS	Occupational Health and Safety
ESAP	Environmental and Social Action Plan	PPE	Personal Protective Equipment
ESGDD	Environmental Social and Governance Due Diligence	PM	Particulate Matter
ESGMS	Environmental, Social and Governance Management System	PMC	Project Management Consultant
ESI	Employee State Insurance	PUC	Pollution Under Control
EWS	Economically Weaker Sections	RCC	Reinforced Cement Concrete
FSI	Floor Space Index	SPCB	State Pollution Control Board
HR	Human Resources	TIDCO	Tamil Nadu Industrial Development Corporation
HSE	Health, Safety and Environment	TNIFMC	Tamil Nadu Infrastructure Fund Management Corporation Limited

Executive Summary

The 'Industrial Housing' project by Vidiyal Residency Pvt Ltd is a residential project, to be developed by Vidiyal Residency Pvt. Ltd. in Nagamangalam Village, Denkanikottai Taluk, Krishnagiri District, Tamil Nadu. The project involves the construction of housing facility for industrial workers [REDACTED] and has been taken up under Affordable Rental Housing Complexes (ARHC) Scheme of Government of India.

The project is being constructed in two phases over a total land area of 2,60,698.74 sq.m and the total built-up area (FSI + Non-FSI) is 19,68,820 sq.ft. The project is being constructed in two phases over a total land area of 2,60,698.74 sq.m and the total built-up area (FSI + non-FSI) is 19,68,820 sq.ft. The first phase of development has a total built up of 14,95,842 sq.ft for which the Environmental Clearance dated 26/04/2022 vide letter no. SEIAA/TN/F.8993/EC8(a)829/2022 has been obtained. The balance built up area of 4,72,977 sq.ft will be taken up for development after obtaining Environmental Clearance.

The first phase of the project has obtained an Environmental Clearance and has been categorised as B2 as per the EIA Notification, 2006 and does not require an EIA report and public consultation to be placed before the Appraisal Committee. The second phase will commence after obtaining the requisite Environment clearance. As per the Tamil Nadu Shelter Fund ESG screening tool, this project has been categorized as a B¹.

The project is at a pre-construction stage. The contractor has been selected for the project. Land has been provided on lease basis to Vidiyal Residency Pvt. Ltd by Government of Tamil Nadu through Tamil Nadu Industrial Development Corporation (TIDCO) for a period of 99 years. The District Administration-of Krishnagiri District, Denkanikottai Taluk, has handed over the possession of 64.42 acres of land to TIDCO for the project. The land is classified as a barren land as per revenue records. There are no environmentally or culturally sensitive areas identified in the vicinity of the project site. The site is clear with no identified environmental issues hence no alternative analysis is required.

Vidiyal Residency Pvt. Ltd, has engaged [REDACTED] as the "Owner's Engineer" with the responsibility as Project Management Consultants (PMC) to manage the construction of the project. The PMC has appointed a contractor for the Engineering, procurement, and construction (EPC) of the project. The Project Management Consultants shall be responsible for ensuring the efficient implementation of the project as per the requirements listed in the Environment Management Plan (EMP).

The project can be divided in three phases, pre-construction, construction, and operational phase. The pre-construction phase would require the EPC contractor to procure all the legal clearances and permissions prior to the construction. There are a few anticipated environmental impacts envisaged during the construction phase that can be managed with the development and strict enforcement of the site-specific Environmental Management Plan and adherence to the conditions specified in the Environmental Clearance.

It is recommended that regular monitoring of air, ground water, noise and the mitigation measures be carried out during the construction phase of the project. The EMP should be revisited in case new

¹ The project may result in specific environment and social impacts, that are site specific for which mitigation measures need to be developed.

impacts are identified. Regular training of the construction workers and PMC staff needs to be provided on EMP related issues. A grievance redress committee and mechanism for prompt response to public complaints is to be activated.

The project shall obtain all applicable and necessary approvals from regulatory authorities. A robust stakeholder engagement plan and grievance redressal mechanism is being developed for the project.

Reporting of the Environment Social and Governance Management System(ESGMS) and agreed action plan shall be submitted to ADB on a semi-annual basis during project implementation; these semi-annual reports on ESGMS and action plan implementation will be shared with ADB and publicly disclosed.

1 Introduction

1.1 Background and Scope

1. The Tamil Nadu Infrastructure Fund Management Corporation Limited (hereafter referred to as 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.

The primary focus of TNSF is:

- Affordable housing – with focus on housing for the economically weaker (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

2. [REDACTED] is planning to setup industrial housing for their workers in Krishnagiri district, Tamil Nadu. For the development of this Project, [REDACTED] has setup a Special Purpose Vehicle (SPV) viz., Vidiyal Residency Private Limited (“Company”), as a 100% owned subsidiary. TNSF is planning to invest in the proposed project and is committed to integrate Environment Social and Governance (ESG) principles into this project. As per the TNSF ESG screening tool, this project has been categorized as a B². In this context Environmental Management Centre LLP (EMC) was appointed by TNIFMC to conduct the Environment Social and Governance Due Diligence (ESGDD) assessment for the project.

3. This document presents the findings of the ESGDD assessment and necessary remedial Environmental and Social (E and S) Action Plan (ESAP) providing relevant mitigation measures.

1.1.1 Project Objectives

4. The objectives of conducting the ESGDD are to assess and rate the ESG risks associated with the proposed project and recommend 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.

1.1.2 Scope of Work

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

I. Background check of project owner/– on corporate governance including policies and incidents related to anti bribery and corruption, fraud, whistle-blower, diversity and inclusiveness, prevention of sexual harassment, child labour, forced labour, environment health and safety policies, governance

² The project may result in specific environment and social impacts, that are site specific for which mitigation measures need to be developed.

structure, regulatory compliances, incidents against Key Management Personnel of the project owner/promoter/sponsor, etc.

II. On-site investigation with respect to:

- Past land use of the site and lease agreement review
- Whether there are any disputes/claims/arbitration in any court of law pertaining to the land.
- Surrounding land use
- Area geology, and potential soil and ground water contamination
- Loss of biodiversity due to land clearing, waste disposal
- Sources and availability of water (ground/surface),
- Consumption of water
- Impact on water availability for the local community in the area
- Potential impact on soil and water bodies nearby
- Effluents – type and quantity of effluent generated, are there any hazardous effluents generation, is there an effluent treatment plant, effluents (quality and quantity) and pollution prevention measures in line with local laws, standards, and regulations.
- Proximity to sensitive areas such as environmental, cultural and heritage site
- Adverse impact of air, water, aesthetic pollution on the environmental, cultural and heritage sites due to project activity
- Loss of accessibility to the local community
- Past track record – have there been any serious environmental or social incidents in the past
- Liabilities - Is the project exposed to potentially significant environmental liabilities, such as those arising from land or ground water contamination, related to the company's past or ongoing operations? Is the company exposed to potentially significant health and safety liabilities, such as those from ongoing or future claims from negatively affected workers and / or communities?

III. On-site consultations with relevant stakeholders such as local community, key regulatory authorities, etc.

IV. Review with respect to the site on these mandatory topics:

- Past legal non compliances/ incidents of violation of laws
- Adverse media articles
- Any voluntary or involuntary resettlement (physical and economic) scenarios due to the project
- To assess whether designs are certified by licenses structural engineers for their structural stability and safety including against seismic and wind forces.
- Project related regulatory documents – consents/ permits/ licenses obtained so far against those applicable for the project
- Assess the capacity of the project owner/ to deal with the environmental and social risks and impacts and implement appropriate training and capacity building measures for safeguards compliance
- Due Diligence will also be conducted if the project has any “associated facilities” that are not funded as part of the project (funding may be provided separately by the borrower or by third parties) if those facilities viability and existence depend exclusively on the project and whose goods or services are essential for successful operation of the project.
- As per ADB safeguard requirements available in ADB's website: environment (Appendix 1, page 30, para 4) - At an early stage of project preparation, it is required to identify potential direct, indirect, cumulative, and induced environmental impacts on and risks to physical, biological, socioeconomic, and physical cultural resources and determine their

significance and scope, in consultation with stakeholders, including affected people and concerned NGOs. The project owner / promotor / sponsor shall assess cumulative and induced impacts due to further development of similar projects or other projects in the area, as appropriate.

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

1.2 Approach and Methodology of ESG-DD

6. The approach and methodology adopted for the ESG-DD is presented in the subsequent subsections.



The reference framework for the ESDD included:

- Applicable national, state, and local environmental and social legislation.
- International Finance Corporation's Environmental and Social (EandS) Performance Standards (2012)
- World Bank Group's General Environmental, Health and Safety (WB-EHS) Guidelines (2007)
- ADB Safeguards

Inception Call:

7. A call was conducted with team members from TNIFMC – including Mr. Rohit Siddareddy- Senior Associate and Ms. Pruthvi S- ESG consultant with the following objectives:

- Obtain an overview of the project and current status.
- Explain the approach and methodology to be adopted for the ESG-DD.

Information Review:

8. EMC prepared a **Project Information Sheet** for obtaining information about the project and its management. A detailed list of **documents and records** required for review and aligned to the reference framework was shared with TNIFMC in the sheet. Additional requests for information were made based on outcomes of the subsequent interactions.

The documents and records received from the "Company" were reviewed for scoping the project site visit and team interactions.

Desk Review: Project's Reputation in Public Domain on E and S aspects:

9. A review of publicly available media sources through web search was conducted to identify any past issues of the Company on aspects related to environment, occupational health and safety, labour welfare and community welfare and safety. The review also included search for any ongoing or past NGO attention/campaigns, or items that may lead to reputational risks to the Company and/or Investors.

The review did not bring forward any significant issues on aspects related to environment, occupational health and safety, labour welfare and community welfare and safety.

Site Team Interactions:

10. The site team interaction was conducted to corroborate project details received through documents with the management and site team. Assessment of the project details was conducted through discussions with stakeholders of the project.

11. The stakeholders interviewed were, [REDACTED] women employees- beneficiaries of the project, Mr. Aadhikeshav from [REDACTED] HR Team, Mr. Sambhav Jain from [REDACTED] Finance Team, Mr. Ravishankar from [REDACTED] and Mr. R Saravanan from [REDACTED] EHS Team on the following topics:

- Understanding the following aspects of the **proposed** project implementation:
 - Organization structure at project level and responsibilities for management of Environment and Social (E and S) aspects of the project
 - Employee Health and Safety (EHS) management measures adopted in the project
 - E and S Legal compliance management in the project
 - Contractor management (fair wages, equal remuneration)
- Measures **proposed** on **environment, health and safety management** at the project site including safe work practices, waste management, training of workers, incident management, emergency preparedness and response, and community grievance redressal.
- Practices on **human resource management** including payment of wages, hours of work, leaves, worker grievance handling, procedures for prevention of sexual harassment for women workers, and labour accommodation
- **Worker accommodation** conditions
- **Management of plants/ equipment** setup in the project area (such as batching plant, diesel generator sets, electrical room)

1.3 About the Project

12. The 'Industrial Housing' project is a residential project, to be developed by Vidiyal Residency Pvt. Ltd. in Nagamangalam Village, Denkanikottai Taluk, Krishnagiri District, Tamil Nadu.

13. The project involves the construction of housing facility for industrial workers of [REDACTED] and has been taken up under Affordable Rental Housing Complexes (ARHC) Scheme of Government of India. The project is being constructed in two phases over a total land area of 2,60,698.74 sq.m and the total built-up area (FSI + non-FSI) is 19,68,820 sq.ft. The first phase of development has a total built up of 14,95,842 sq.ft for which the Environmental Clearance dated 26/04/2022 vide letter no. SEIAA/TN/F.8993/EC8(a)829/2022 has been obtained. The balance built up area of 4,72,977 sq.ft will be taken up for development after obtaining Environmental Clearance.

14. State Pollution Control Board Category of the project

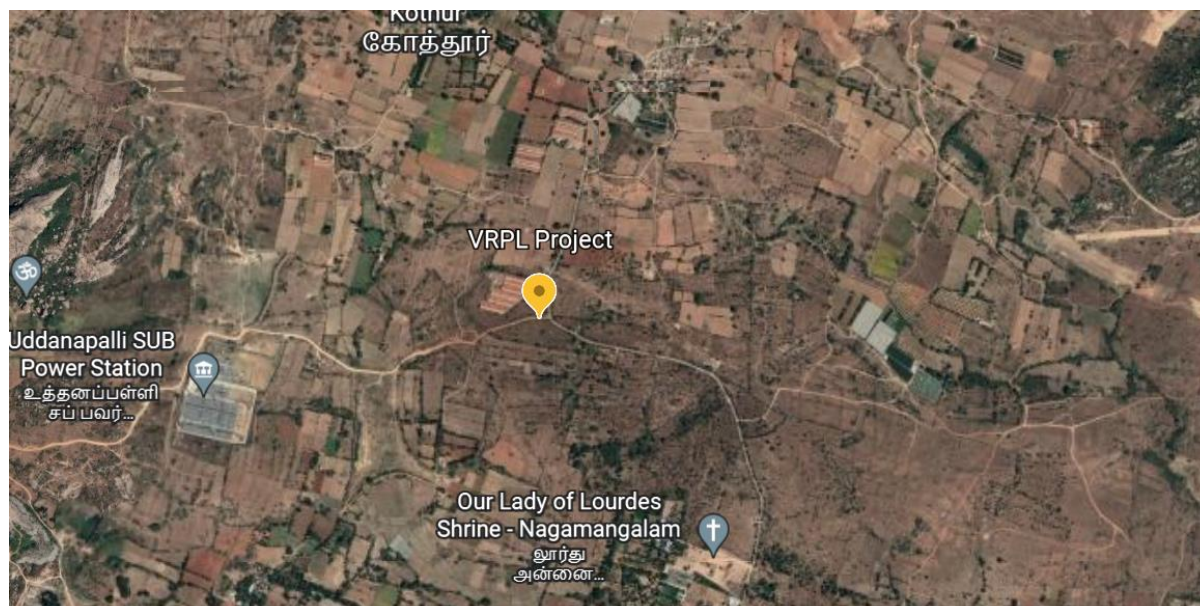
Pollution Control Board	Category
Tamil Nadu Pollution Control Board	B2 ³

1.3.1 Current Status of Project

15. The project is at pre-construction stage.

1.3.2 Project Location, Connectivity and Land Use Land Cover

16. The project is in Nagamangalam Village, Denkanikottai Taluk, Krishnagiri District, Tamil Nadu.



Location: (<https://goo.gl/maps/X7JrV8ttTrL4diK69>)

³ Building and Construction Projects - Schedule 8 (a): Built-up Area <1, 50,000 sq. mtrs (ie' 1,44, 247.12 Sq. m) - Category'B2'. Category B2 projects do NOT REQUIRE an EIA report and public consultation to be placed before the Appraisal Committee

Land

17. The land has been provided on lease basis to the SPV by Government of Tamil Nadu through TIDCO⁴ for a period of 99 years. The District Administration-of Krishnagiri District, Denkanikottai Taluk, has handed over the possession of 64.42 acres of land to TIDCO for the project. The land is classified as a barren land as per revenue records. The land has historically been a government land (vacant) and has been provided on a lease basis for the specific purpose of this project. The due diligence confirms that land was not acquired in anticipation of the project. The land parcel has a few dilapidated/unused existing structures, which are included as part of the land lease and will be demolished prior to construction. [REDACTED]

Connectivity

Projects immediate borders	The project is bordered by Village Road to TNEB sub-station on the North, 'Our Lady of Lourdes Shrine' Church and multiple private landowners in the South, Nagamangalam-Kelamangalam Village Road on the East, and Agricultural lands owned by multiple private landowners on the West.
Highways	The project site is connected to the State Highway (SH) 85 – Attibele-Rayakottai road towards the South of project location through a 2.5 kms long secondary road and to State Highway (SH)-17 – Rayakotta Road towards the North of project location through a 2.2 kms long secondary road.
Railway Stations	The nearest railway station from the project location is Periya Nagathunai Railway Station (approx. 6.6 km south-west).
Bus Stations	Kelamangalam Bus Stand is the closest Bus station to the project (approx. 14.3 km. west).
Airport	Hosur Airport is located at an approx. aerial distance of 19 kms west of project.

Social Infrastructure

Hospitals	Rajiv Hospital (approx. 9.9 km) and Primary Health Centre (approx. 11 km) are the nearest hospitals to the project. Other nearby medical facilities (Sri Balaji Clinic and Government mini clinic) are within 5 km radius of the project.
Schools and Colleges	The schools and colleges located near the project site include Nimai Public School, Government High School, Vidyalaya Matriculation School Uddanapalli, Government Polytechnic College, Kelamangalam, Annai Madhammal Institute of Hotel Management and Vocational Science Shoolagiri, and Shri Bharathi College of Education.
Police Station	The nearest police station is located on Rayakotta Road at approximately 3.8 km from the project site.

⁴ Tamil Nadu Industrial Development Corporation Ltd, an industrial development agency owned by the Government of Tamil Nadu

⁵ Land alienation in this context means transfer of government land to a state government company for a specific use. The district collectors are empowered with the power to alienate the Government lands in Tamil Nadu to State Government Undertakings / Boards etc, Central Government Departments / Undertakings, for the implementation of their projects and schemes

Land use:

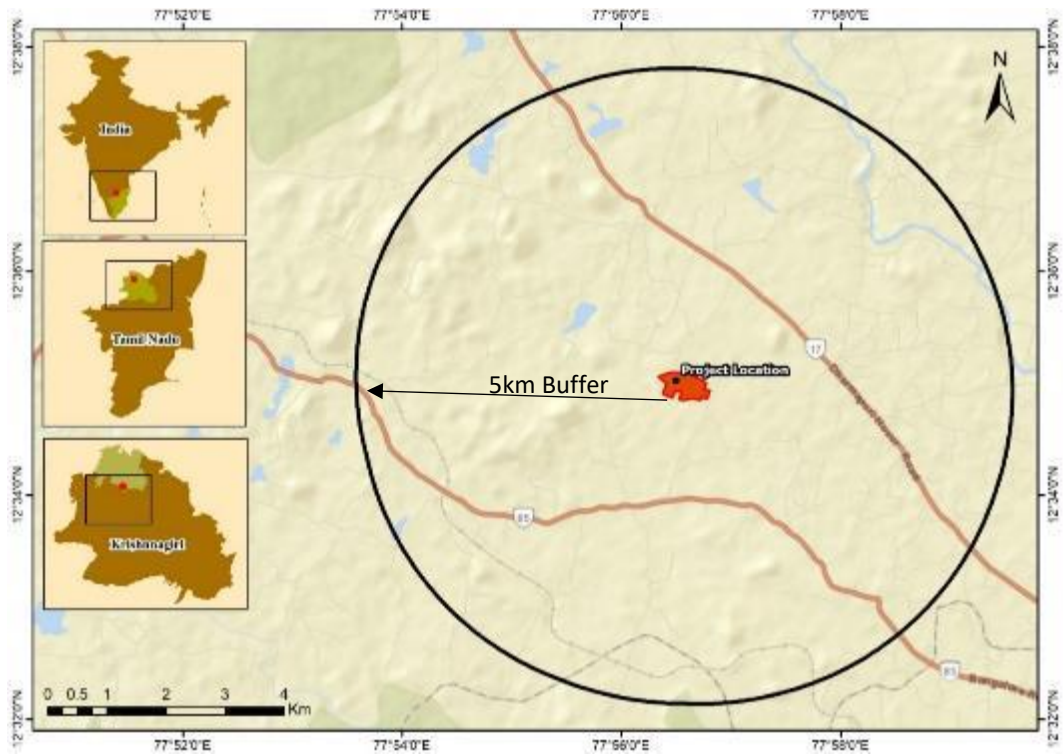


Figure 1 Location map of the site

18. The project is located near Nangalmanglam village in the Krishnagiri district of Tamil Nadu state. For further investigation of the site a 5 km buffer around the site was created.

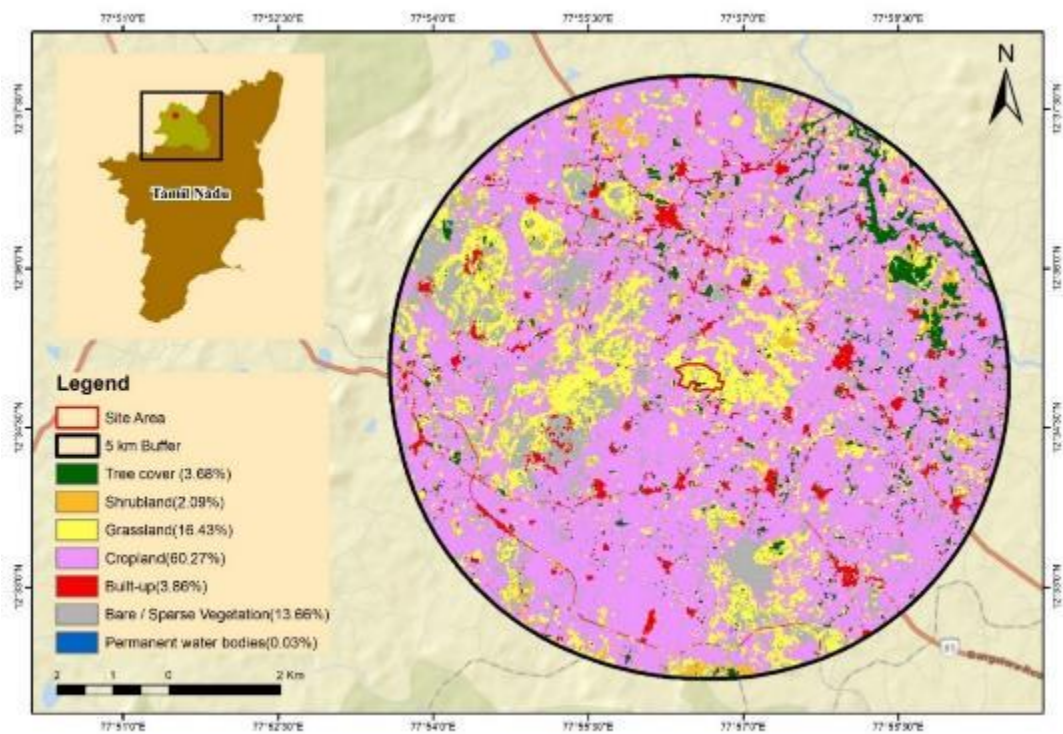


Figure 2 Map showing land use land cover map around Site

19. The map in Figure 2 shows land use land cover map of the area around site. The maximum area around the site is occupied by Cropland, followed by bare/sparse vegetation which sums up to 60.27% and 13.66% respectively. The cropland is uncultivated consisting primarily bushes and shrubs. The lowest area percentages have been recorded in terms of permanent water bodies i.e., 0.3%. The area around the site has little or no permanent water bodies.

20. The land use of site is mostly fallow and open barren land. The project land is not used for cattle grazing by nearby villagers. As per the revenue records the land classification of the project land is barren with no agricultural activities being undertaken on the site.

Associated Facilities:

The project has the following associated facilities planned

Water Supply	1930 Kilo Litres per Day(KLD) to be met by Tamil Nadu Water Supply and Drainage (TWAD) board/ Municipal Corporation, Tankers/ Rainwater Reservoirs
Sanitation	3 Nos with total capacity of 1467 KLD with Sequential Batch Reactor Technology
Municipal Solid Waste	Biodegradable Waste-4430 kgs/day to be treated in organic waste converters and used as manure for the green belt Non-biodegradable waste-5895kgs/day to be handled to the authorized vendor Sewage Treatment Plant (STP) sludge- 500 kg/day to be used as manure for gardening
Electricity	3795 kVA from Tamil Nadu Generation and Distribution Corporation Ltd (TANGEDCO)
Diesel Generators (D.G) Set back up	Proposed D.G Sets 1 No. of 1250 kVA D.G set 4 Nos. of 1010 kVA D.G set
Rainwater Harvesting and Reservoir	Proposed to provide 1mtr wide rainwater trenches all along the periphery of the site. Roof top rainwater to be collected in the proposed reservoir area and proposed to provide adequate percolation pits
Greenbelt and OSR	39,155.54 sq.m
Medical Facility	464.515 sq.m
Commercial Complex	963.33 sq.m
Creche	279.298 sq.m
Central Kitchen	900 sq.m
Recreation Centre	966.213 sq.m
Maintenance Office	557.418 sq.m
Security Main	86.520 sq.m
Security Men	25.000 sq.m

Site Connectivity:

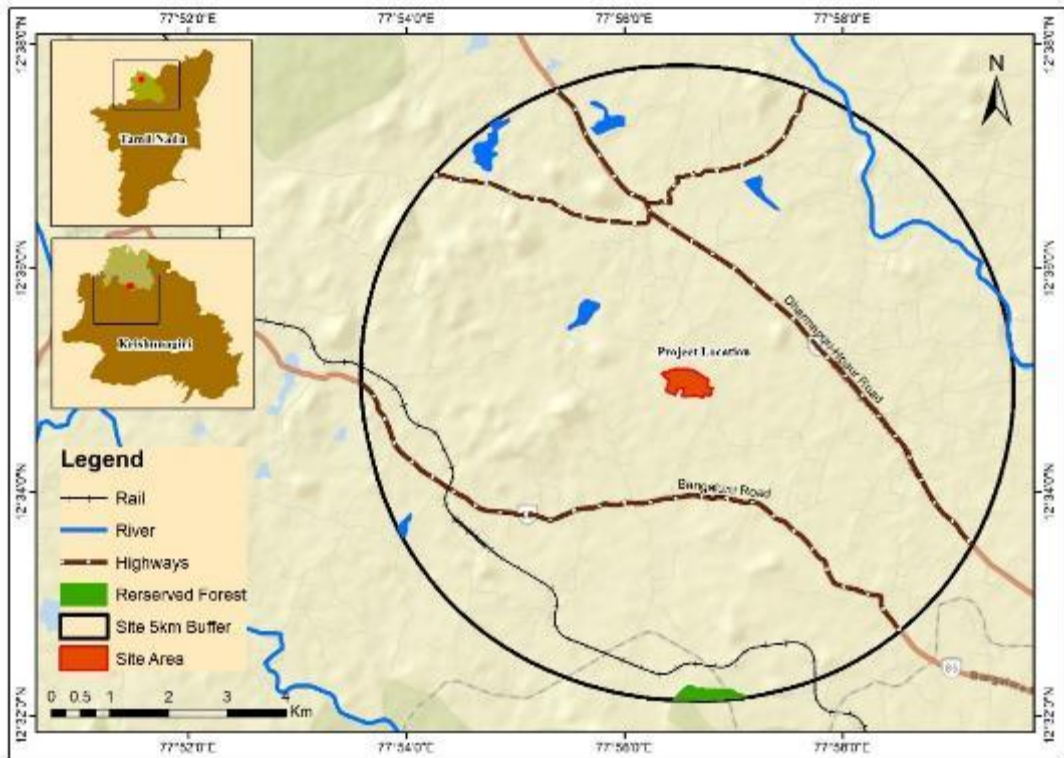


Figure 3 Connectivity of the Site

21. The site is well connected through internal village roads and lies in around 2 km aerial distance to both Dharmapuri Hosur road and Bengaluru Road. The nearest railway station is Periya Nagathunai station i.e., 3.86 km southwest. The nearest airports are Hosur airport that is 19.25km in the northwest direction and Kempegowda International airport is approximately 70 kms in the northwest direction.

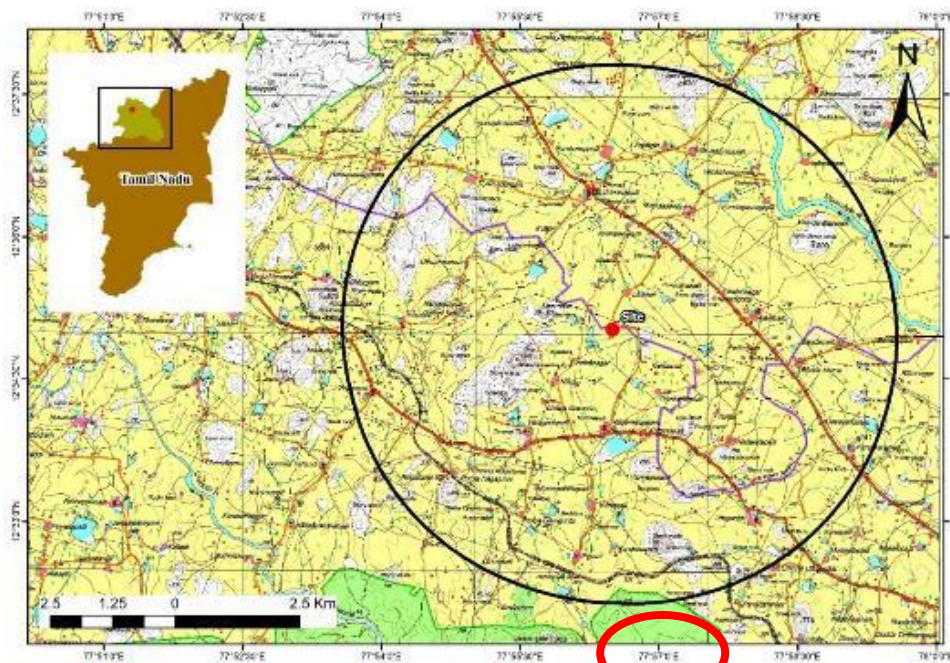


Figure 4 Map Showing 5 Km buffer around the site area


22. It can be stated from the analysis of the topographic sheet that the southernmost tip of the site buffer covers Udedurgam reserved forest at an approx. aerial distance of 5 km. However, the project will not have any impact on the forest.

23. There is presence of stony waste land about 2.26 km in the southwest of the site which at present is used for open pit mining as confirmed from Google earth. However, this will not lead to any impact on project.

2 ESG Risk Rating Tool - Key findings

ESG Risk Rating Tool - TNSF (Version 1.0)			
Project Details			
Name of the Project	Housing Facility for Industrial Workers	Start of Evaluation Date	26-05-2022
Site Location / Alternatives under consideration	Nagamangalam Village, Denkanikottai Taluk, Krishnagiri District, Tamil Nadu	Project Developer	
Total Project Cost (in INR Million)		TNSF Investment (in INR Million)	
		Investment Period	

Dimension	No. of Observations
List of ESG Issues	14
Environment	7
Social	4
Governance	3
Material ESG Risks	13
Environment	6
Social	4
Governance	3

Project Risk Rating		
	Risk Level (%)	ESG Risk Rating
	44.6429	

Sl. No.	Dimension	Risk Score
1	Environment	32.00
2	Social	24.00
3	Governance	19.00

Project Risk Rating - Scale	
Scale	Risk Level
Low	0-15%
Medium	16-30%
Med-High	31-45%
High	46-60%
Very High	>60%

Note to the user

- The ESG Risk Rating Tool is developed to assist in evaluation of the ESG risks of the identified project.
- The person using this tool should not tamper with the in-built evaluation criteria. Any changes to the criteria shall be done so after getting requisite approval from Impact Monitoring Officer.
- All changes shall be indicated in the document control log provided below.

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

25. The issues identified are based on the current project status and may evolve during the course of construction and operational phase. The overall risk rating is 44.64 % which falls on "med-high" risk on project risk rating scale. The separate scores for environment, social and governance are discussed below:

Environmental	7
Social	4
Governance	3

The material risks identified from the tool include

Environmental	Management of Municipal Solid Waste
	Management of Construction and Demolition Waste
	Extraction of Ground water
	Dust or odours from handling materials including construction materials, sewage and waste
	Discharge of sewage or other effluents to water or land
	Changes in water bodies or the land surface affecting run-off
	Climate Change mitigation and adaptation
Social	Labour Welfare
	Grievance Redressal Mechanism for workers and stakeholders

	Stakeholder engagement and management
	Non-compliance to labour safety/policies
Governance	Penalties from regulatory authorities
	Reputation risk due to non-compliance
	Absence of policies

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

3.1 Method of Assessing Compliance

26. The compliance status of the project on applicable Environment Health and Safety (EHS) legal regulations will be presented in this section. The method of reading the tables is as follows:

- The regulations and their applicable requirements will be listed in the first and second columns, respectively.
- The compliance of project with legal requirements will be indicated based on the legend given below.

C Regulation and its requirement are applicable to the project.
The project is **COMPLIANT** to the requirement.

PC Regulation and its requirement are applicable to the project.
The project is **PARTIALLY COMPLIANT** to the requirement.

NC Regulation and its requirement are applicable to the project.
The project is **NON-COMPLIANT** to the requirement.

NA Regulation and its requirements are **NOT APPLICABLE** to the project

Info **INSUFFICIENT INFORMATION** to assess the status of compliance/conformance

- The last column will provide remarks on the status of compliance. Text in bold will describe the nature of non- Legal Compliance – Occupational Health and Safety

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
1.	The Building and Other Construction Workers' (Regulation of Employment and Conditions of Service) Central Rules, 1998	The project under assessment shall enter the construction phase. Further the regulation provides requirements on Occupational, Health and Safety	a) Safety and Health – General Provisions (Chapter IV) – physical hazards, PPE, electrical hazards, vehicular traffic b) Fire Protection (u/s 35 and u/r 62) c) Stability of structures (u/s 49 and u/r 76)	Currently NA	<ul style="list-style-type: none"> • The project construction has not started, hence cannot be ascertained. However, the same will be taken care by contractor during the construction phase. • The contractor will abide by the international best practices on occupational health and safety such as those in Section 4.2 of World Bank EHS Guidelines on Construction and

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
		measures pertaining to construction activities.	<p>d) Lifting appliances and gear (Chapter VII) – testing, safe load indicators, ropes,</p> <p>e) Reporting of Accidents (u/r 237)</p> <p>f) Medical examination – crane operators, exposure to special occupational hazard (u/r 250)</p>		Decommissioning Activities. ⁶
2.	Central Electricity Authority (Measures relating to Safety and Electric Supply) Regulations, 2010	The project will use electricity for various activities at the project site	<p>a) General safety requirements for:</p> <ul style="list-style-type: none"> - Electric supply lines and apparatus safety - Cut-out - Earthed terminal - Dangerous Notice - Flexible Cables <p>b) Fire buckets filled with clean dry sand and ready for immediate use for extinguishing fires, in addition to fire extinguishers</p>	Currently NA	<ul style="list-style-type: none"> • The total power requirement for the project shall be sourced from TANGEDCO, as mentioned in the EC. • Apart from this, the project currently does not have any electrical distribution system in place since the construction has not started. However, the same will be taken care by company/contractor during the construction phase.
				Currently NA	<ul style="list-style-type: none"> • The firefighting equipment has not been provided on the site yet as the construction has not begun. However, the same will be taken care by company/contractor during the construction phase.

⁶ IFC World Bank Group. 2007. Environmental, Health, and Safety (EHS) Guidelines – General EHS Guidelines: Construction and Decommissioning
https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

#	Regulation	Reason for Application	Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
			suitable for dealing with electric fires shall be kept at site		
3.	Central Motor Vehicle Act 1988 and Rules 1989 (amended 2016)	The project may lease vehicles from third party vendors used for transportation and construction.	<ul style="list-style-type: none"> a) Driver to obtain a driving license authorizing him to drive/operate the vehicle b) Owner to obtain Certificate of Registration for the vehicle c) For valid registration, a transport vehicle should have a Certificate of Fitness d) Owner to obtain insurance policy for the vehicle 	Currently NA	<ul style="list-style-type: none"> • The projects construction has not started, hence cannot be ascertained. However, the same will be taken care by company/contractors during the construction phase.
4.	Fire No Objection Certificate (NOC) from Municipal Corporation under the Development Control Regulations	The project classifies as high-rise buildings and needs approval for more than 17.25 m in height	a) Obtaining Provisional Fire NOC at the time of obtaining Commencement Certificate from the Municipal Corporation	Currently NA	<ul style="list-style-type: none"> • The company is in the process of obtaining the same.
5.	Ministry of Civil Aviation (Height Restrictions for Safeguarding of Aircraft Operations) Rules, 2015.	The project is located within the 20 kms radius of the Hosur aerodrome.	a) Obtain No Objection Certificate for the height clearance under the Rules	Currently NA	<ul style="list-style-type: none"> • Needs to be obtained prior to starting the construction activities. The company has submitted an application for the same.

3.2 Legal Compliance - Labour and Working Conditions

#	Regulation		Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
1.	Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act 1996 and Rules 1998	The Company will employ more than ten building workers in building or other construction work on daily basis.	a. Registration of establishment and workers under the Building and Other Construction Workers (BOCW) Act 1996 and Rules 1998	Currently NA	<ul style="list-style-type: none"> The construction has currently not started for the project on site. The contractor will be applying for the BOCW registration.
			b. Hours of work, rest intervals and weekly off (Chapter XXVI)	Currently NA	<ul style="list-style-type: none"> The construction has currently not started for the project on site. The same will be taken care by company as part of EMP in construction stage.
			c. Welfare of Building workers (Chapter XXVIII) – latrine, urinal, canteens		
2.	The Contract Labour (Regulation and Abolition) Act, 1970; and Contract Labour (Regulation and Abolition) Central Rules, 1971	The Company may appoint contractors who may have appointed sub-contractors for various project activities	a. Registration of principal employer	Currently NA	<ul style="list-style-type: none"> The contract labour has not been appointed since the company has not finalized the contractor for construction yet. The tender for the contractor will be issued mid- May 2022.
			b. Contractor's license for workers more than 50.		
3.	Minimum Wages Act 1948	The Company, through its sub-contractors will engage	a. Payment of minimum wages as per	Currently NA	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the

#	Regulation		Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
		unskilled, semi-skilled and skilled personnel in the project	latest circular. u/s 5and12 b. Copy of minimum wages abstract issued by the respective state		requirement will be applicable in future.
4.	Employee Compensation Act 1923 and Amendment Act 2009	The Company may employ workers directly and through Contractors whose remuneration is more than INR 21,000/- per month and are not covered under ESI	Payment of compensation to employee. Obtaining insurance policy for the same. u/s 4(2)	Currently NA	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.
5.	Employees' State Insurance Act (ESI), 1948	The Company through its contractors engages personnel whose remuneration is less than INR 21,000/-	Deduction of employee contribution and deposit of employee and employer contribution with the ESI Corporation. u/s 40(1)	Currently NA	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.
6.	Employees' Provident Funds (EPF) and Miscellaneous Provisions Act, 1952 amended upto 1996's	The Company, if itself and through its contractors employs more than 20 persons at the project, shall be considered for compliance under this Act.	Deduction of employee contribution and deposit of employee and employer contribution with the authority. u/s 6		

#	Regulation		Legal Requirements	Compliance Status	Details of Compliance/ Non-Compliance
7.	Inter-State Migrant Workers Act 1979	The project may employ migrant construction labourers	<p>a. Registration of Establishment as principal employer (u/s 4)</p> <p>b. Contractor's license for engaging migrant workers (u/s 8)</p>	Currently NA	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.
8.	The Child and Adolescent Labour (Prohibition and Regulation) Act, 1986 amended in 2016	The Company, through its sub-contractors may engage unskilled, semi-skilled and skilled personnel in the project	Prohibit the engagement of children in all occupations and to prohibit the engagement of adolescents in hazardous occupations and processes	Currently NA	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.
9.	Private Security Agencies (Regulation) Act, 2005	If the company employs a private security agency to provide security at the project.	a. Private Security Agency to obtain a license. u/s 4	Currently NA	<ul style="list-style-type: none"> No private security agency has been hired for the project yet, therefore. Provisions of the requirement will be applicable in future.
10.	The Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act 2013	The project may employ female workers at site.	<p>a. Constitution of Internal Complaints Committee (ICC). u/s 4</p> <p>b. Receive complaints of sexual harassment. u/s 9</p> <p>c. Conduct enquiry on receipt of complaint. u/s 11</p>	Currently NA	<ul style="list-style-type: none"> The workforce has not been employed for the construction work yet. Provisions of the requirement will be applicable in future.

3.3 Applicability of International Finance Corporation (IFC) Performance Standards

27. There are a total of eight (8) Environmental and Social Performance Standards under IFC's Sustainability Framework of 2012, the applicability of which is assessed in **Table 3-1**.

Table 3-1: Establishing Applicability of IFC Performance Standards

Performance Standard	How the Performance Standard is applicable?	Statement on Applicability
Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts	The project activities have the potential to cause environmental and social impacts.	Applicable
Performance Standard 2: Labor and Working Conditions	The project employs skilled, semi-skilled and skilled personnel for various operations.	Applicable
Performance Standard 3: Resource Efficiency and Pollution Prevention	The project consumes resources (water, energy) and generates effluent and waste (solid, e-waste, hazardous waste, construction, and demolition).	Applicable
Performance Standard 4: Community Health, Safety, and Security	The project could potentially impact the community health, safety, and security.	Applicable
Performance Standard 5: Land Acquisition and Involuntary Resettlement	The project does not involve land acquisition of any kind. The District Collector, Krishnagiri District, vide letter dated 19.09.2021 has submitted the proposal to the Government of Tamil Nadu for the alienation of 64.42 acres of land in favour of TIDCO.	Not Applicable
Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	The projects do not interact with forests or biodiversity rich areas.	Not Applicable
Performance Standard 7: Indigenous Peoples	The projects have not been developed on Scheduled Areas or tribal lands.	Not Applicable
Performance Standard 8: Cultural Heritage	The projects are not located near any place of cultural importance.	Not Applicable

3.3.1 World Bank Group’s EHS Guidelines

28. The IFC Performance Standard 3: Resource Efficiency and Pollution Prevention refers to World Bank Group’s EHS Guidelines. The **EHS General Guidelines** is applicable to the Company. For ease of reference, the General guidelines have been integrated with the IFC Performance Standards as applicable.

3.3.2 Method of Assessing Compliance and Gaps

29. The assessment of projects with requirements of IFC Performance Standards 1, 2, 3, and 4 and WB-General EHS guidelines is presented in the subsequent **sub-sections 4.2.2, 4.2.3, 4.2.4, and 4.2.5** respectively.

3.3.3 Method of Assessment

30. The method of reading the tables under these sections is as follows:

- The requirements of the IFC-PS and WB-EHS guidelines are listed in the first column.
- The level of alignment of the projects with the IFC-PS and WB-EHS guideline requirements has been determined and assessed based on the legend given below.

Aligned	Requirement is applicable to the project. The project is in alignment with the intended outcome of the requirement.
Partially Aligned	Requirement is applicable to the project. The project partially fulfils or partially aligns with the intended outcome of the requirement.
Not Aligned	Requirement is applicable to the project. The project does not fulfill or align with the intended outcome of the requirement.
Information Not Available	Requirement is applicable to the project. But currently information is not available
NA	Not Applicable

- The last column provides remarks on the status of alignment. Text in **bold** describes the nature of non-alignment.

3.3.4 Performance Standard 2 - Labour and Working Conditions

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
1.	Adopt and implement human resources policies and procedures	Information Not Available	<ul style="list-style-type: none"> • The project construction has not started. • Alignment to this IFC PS requirement cannot be ascertained at current stage.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
			<ul style="list-style-type: none"> Provisions of the requirement will be incorporated by the company.
2.	Provide workers with documented information regarding their rights under national labour and employment law	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
3.	Respect collective bargaining agreement with workers' organization	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
4.	Not discourage workers from electing worker representatives, forming or joining workers' organizations for collective bargaining. Will not discriminate against workers joining such organizations.	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
5.	Provision of accommodation and basic services for migrant workers	Information Not Available	<ul style="list-style-type: none"> It was understood that migrant laborer's will be provided labor camp facilities by the contractor outside the project area. However, the Company has not yet finalized any Contractor for construction work. Alignment to this IFC PS requirement cannot be ascertained at current stage Provisions of the requirement will be incorporated by the company.
6.	Base the employment relationship on the principle of equal opportunity and fair treatment	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
			<ul style="list-style-type: none"> Provisions of the requirement will be incorporated by the company.
7.	Take measures to prevent and address harassment, intimidation, and/or exploitation, especially regarding women	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage Provisions of the requirement will be incorporated by the company.
8.	Procedure for addressing collective dismissals/ retrenchment	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage Provisions of the requirement will be incorporated by the company.
9.	Provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns.	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
10.	Not employ children in any manner that is economically exploitative, or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
11.	Not employ forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage Provisions of the requirement will be incorporated by the company.
12.	Provide a safe and healthy work environment, taking into account inherent risks in		

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
	its particular sector and hazards in work areas		
	a) Slips and Falls b) Struck by objects c) Work at Height d) Overexertion	Information Not Available	<ul style="list-style-type: none"> • The project construction has not started. • Alignment to this IFC PS requirement cannot be ascertained at current stage. • Provisions of the requirement will be incorporated by the company.
	e) Confined spaces and excavations	Information Not Available	<ul style="list-style-type: none"> • The project construction has not started. • Alignment to this IFC PS requirement cannot be ascertained at current stage. • Provisions of the requirement will be incorporated by the company.
	f) Moving machinery	Information Not Available	<ul style="list-style-type: none"> • The project construction has not started. • Alignment to this IFC PS requirement cannot be ascertained at current stage. • Provisions of the requirement will be incorporated by the company.
	g) Dust	Information Not Available	<ul style="list-style-type: none"> • The project construction has not started. • Alignment to this IFC PS requirement cannot be ascertained at current stage • Provisions of the requirement will be incorporated by the company.
	h) Exposure to dust, chemicals, hazardous or flammable materials, and wastes in a combination of liquid, solid, or gaseous forms	Information Not Available	<ul style="list-style-type: none"> • The project construction has not started. • Alignment to this IFC PS requirement cannot be ascertained at current stage. • Provisions of the requirement will be incorporated by the company.
	i) Fire precautions	Information Not Available	<ul style="list-style-type: none"> • The project construction has not started. • Alignment to this IFC PS requirement cannot be ascertained at current stage

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
			<ul style="list-style-type: none"> Provisions of the requirement will be incorporated by the company.
	j) Potable Water Supply	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage Provisions of the requirement will be incorporated by the company.
	k) First aid	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
	l) Labour camps	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage Provisions of the requirement will be incorporated by the company.
	m) Communication and Training <ul style="list-style-type: none"> OHS Training New Task Employee and Contractor Training On-site first-aid training 	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
13.	With respect to contracted workers, ascertain that the third parties who engage these workers are reputable and legitimate enterprises	Information Not Available	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
14.	Monitor primary supply chain on an ongoing basis to identify new risks or incidents of child and/or	Information Not Available	<ul style="list-style-type: none"> The project construction has not started.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
	forced labor, and life-threatening situations		<ul style="list-style-type: none"> Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.

3.4 Performance Standard 4: Community Health, Safety, and Security

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
1.	Design, construct, operate, and decommission the structural elements or components considering risks to third parties	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
2.	Avoid or minimize the potential for community exposure to hazardous materials and substances that may be released by the project.	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
3.	Avoid or minimize the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable diseases that could result from project activities	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started. The Company has not yet finalized any Contractor for construction work. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
4.	Assess risks posed by its security arrangements to those within and outside the project site.	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
5.	Assist and collaborate with the Affected Communities, local government agencies, and other	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started.

#	IFC PS Requirements 2012	Alignment Status	Details of Conformance/ Non-Conformance
	<p>relevant parties, in their preparations to respond effectively to emergency situations.</p> <ul style="list-style-type: none"> Emergency Preparedness and Response Life and Fire Safety 		<ul style="list-style-type: none"> Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
6.	The project's direct impacts on priority ecosystem services may result in adverse health and safety risks and impacts to Affected Communities.	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
7.	Traffic Safety	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
8.	Restricting access to the site, through a combination of institutional and administrative controls	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.
9.	<p>Removing hazardous conditions on construction sites:</p> <ul style="list-style-type: none"> Covering openings to small, confined spaces Ensuring means of escape for larger openings such as trenches or excavations Locked storage of hazardous materials 	Insufficient Information	<ul style="list-style-type: none"> The project construction has not started. Alignment to this IFC PS requirement cannot be ascertained at current stage. Provisions of the requirement will be incorporated by the company.

3.5 Compliance to ADB Safeguards - Key findings

31. This section classifies the risk to the project from environmental stress/climate change as well as the risk to the environment and climate change due to project activities. The risk rating of 'LOW',

‘MEDIUM’ and ‘HIGH’ is given to each of the aspects given below. Further, an overall risk is given to the project due to climate / environmental impacts.

3.5.1 Impact of Environmental Stress and Climate Change on Project

Ground Water Development Status:

The project site is in Nagamangalam Village, Denkanikottai Taluk (Krishnagiri District) which is classified as ‘Safe’⁷ in terms of Ground Water Development Status by the Central Ground Water Board (CGWB).

Therefore, the risk to the project from depleting ground water levels is classified as ‘LOW’

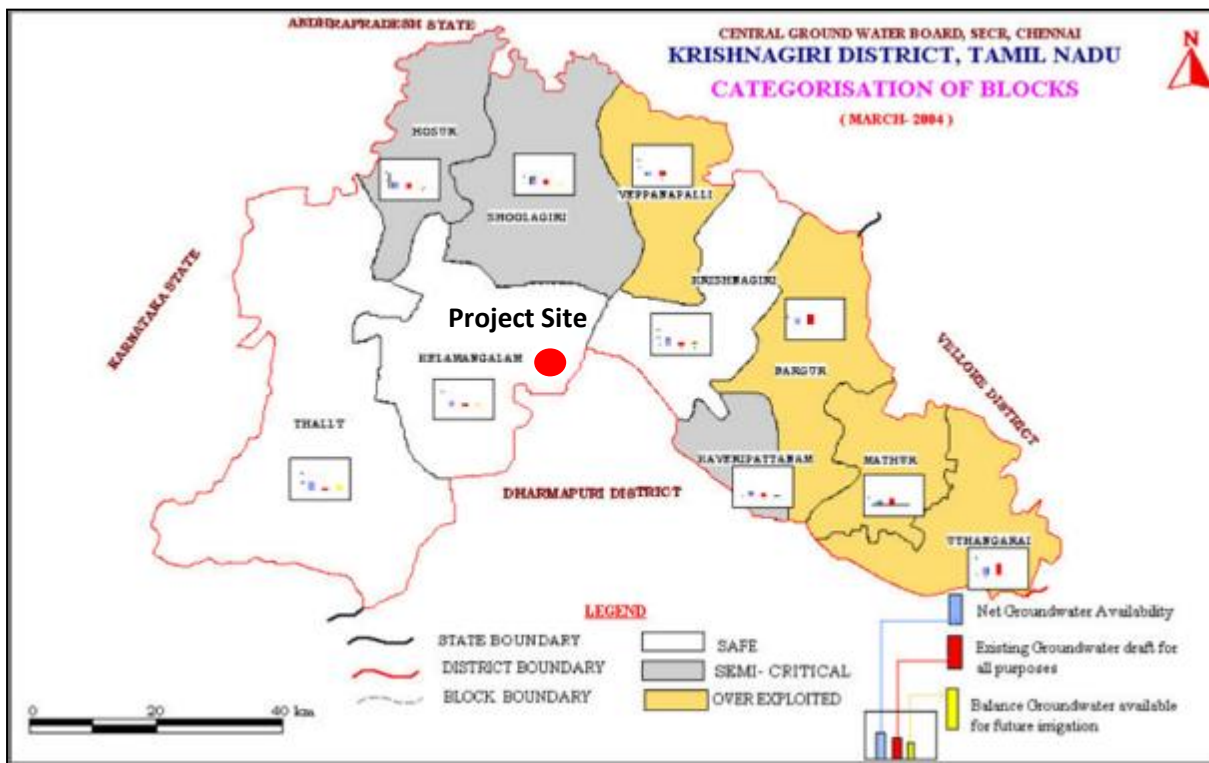


Figure 4 Map showing block wise ground water exploitation status

Vulnerability to natural and climate related disasters:

Seismology –

The project lies in the Zone II i.e., Low Damage Risk Zone (MSK VI or less) according to the Building Materials and Technology Promotion Council (BMTPC) Earthquake Hazard Map.

⁷ Groundwater Categorization by Central Ground Water Board- ‘Safe’ where the stage of Ground water extraction is less than 70 %

Cyclones –

The project lies in the Low Damage Risk Zone where maximum sustained wind is less than 34 to 47 m/s according to the BMTPC Wind and Cyclone Hazard Map

Floods –

The project is in the Low-risk Zone for floods according to the BMTPC Flood Hazard Map.

The risk to the project from natural and climate related disasters is classified as 'LOW'

Critically Polluted Area:

The project site is not located near (within 5 km distance) any Notified Polluted areas as per Central Pollution Control Board in the 'Comprehensive Environmental Assessment of Industrial Clusters', 2013.

The nearest notified polluted area to the project location is Vellore, Tamil Nadu, which is located at an aerial distance of approximately 135 km from the project site.

Thus, the risk to the project from polluted area is negligible.

Presence of Municipal Dump Site/ Hazardous Waste Landfills:

The nearest active dumpsite from the project area is Hennagara Lake Garbage Dump which are located at an aerial distance of ~ 36 km to the north-west of the Project.

Thus, risk of exposure to pollution from dump sites to the project is negligible.

Sources of pollution around the project location:

TATA Industries Estate is the nearest industrial area located at ~3.5 km towards south-west of the project site. Other industries falling within the 5 km radius of the project are HK Industrial Enterprises and Sree Rayan Industries. There is no Sewage treatment plant located in the vicinity of the project.

Thus, risk of exposure to pollution from the nearby industries to the project is 'Low'.

The risk from environmental stress/climate change to the project is classified as 'LOW'.

Necessary mitigation measures will be taken as a part of EMP to be developed for construction phase.

3.5.2 Impact of Project on Environment and Climate Change

Impacts on Protected Area:

Udedurgam reserved forest is the nearest protected area located at an approx. aerial distance of 5 km. However, the project activities will not have any impact on the forest.

Mudumalai Tiger Reserve and Karaivetti Bird Sanctuary are the nearest protected areas from the project site and are located at an approx. aerial distance of 190 km south-west and 200 km south-east respectively from the project site.

Therefore, the risk from the project activities to the protected area is negligible.

Impacts on Water:

The project proposes to provide 1 m wide water trenches all along the periphery of the site. Roof top rainwater to be collected in the proposed reservoir areas and proposed to provide adequate percolation pits. The project shall use water from water tankers for construction and domestic purposes.

Sewage treatment plant (STP) with treatment capacity of 490 KLD shall be provided at site for wastewater management. It is proposed that the treated water will be reused for flushing and the balance for water the Open Space Ratio (OSR) and greenbelt.

Therefore, the risk from the project activities to the water resources is classified as 'LOW'.

Impacts on Air/GHG Emissions:

As per EC conditions, the project during construction phase shall use a low sulfur diesel, ensure regular air, and noise emission and use acoustically enclosed DG set with sufficient height

The risk from the project activities to air resources is classified as 'LOW'.

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

An overall risk given to the project due to for Climate / Environmental Impacts is 'Low'.

[The highest category assigned to any of the above-mentioned aspect will be the risk category assigned to the project.]

3.5.3 Social Impact Assessment

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

33. Land Ownership and Transfer Details

The land has been provided on lease basis to the VRPL by Government of Tamil Nadu through TIDCO⁸ for a period of 99 years. The District Administration of Krishnagiri District, Denkanikottai Taluk, has handed over the possession of 64.42 acres of land to TIDCO for the project. [REDACTED]

[REDACTED] The land has historically been a government land (vacant) and has been provided on a lease basis for the specific purpose of this project. The due diligence confirms that land was not acquired in anticipation of the project. The land parcel has a few dilapidated/unused existing structures, which are included as part of the land lease and will be demolished prior to construction. There are no non-titleholders present in the land. The site also does not have presence of indigenous people as confirmed in the Involuntary Resettlement (IR) and Indigenous Population (IP) checklist documented as annexure 3 and 4. As the project is categorized "B2" under the environment clearance obtained for the project, no public consultations are required to be undertaken, however, focus group discussions have been conducted with the surrounding community, the details of which are documented as annexure 6. Further consultations will be carried out with surrounding communities and included in the updated Due Diligence Report. The project will have no impact on any existing religious or cultural sites in the vicinity and no hindrance shall occur in access to the same due to the project.

34. Proximity to Cultural, Religious and Heritage Sites:

- The area was screened to find the cultural and heritage sites. A screening exercise was carried out on all India inventory of site and monuments as maintained by Bhuvan(Indian platform of Indian Space Research Organization (ISRO)), which stated that the nearest site of archaeological importance is Rayakottai Hill fort (ASI Code: CHETN179) that is approximately 12 kms southeast from the site.
- Manual screening of cultural and religious sites through google earth pointed towards the below temples, churches, and mosques in the periphery of the site.
- However, none of these sites are on the project site or have their access through the project site, therefore it will not have an impact on the access to the surrounding community

List of Religious Places		
Name	Distance (km)	Direction
Sri Shani Mahatma Temple	9.27	WNW
Sri Siddhalingeswara Swamy Temple	9.58	WNW
Mariyamman Temple	9.06	WNW
Holy Eternity Church	8.46	WNW
Jeeva vasal Church	8.8	WNW
Sacred. Heart Church	9.19	WNW
Masjid E Bilal	8.67	WNW
Masjid E Zaheda	9.28	WNW
Noorani Masjid	9.59	WNW
Jamia Masjid	7.96	WSW
Noor E Elahi Masjid	3.55	SSE
Jamia Masjid	3.96	SSE
Masjid E Noor	4.08	SSE
Sri Muneswara Swamy Temple	2.73	SE
Mariyamman Temple	0.96	SE

⁸ The Tamil Nadu Industrial Development Agency owned by the Government of Tamil Nadu

Sri Anjaneya Temple	1.09	SW
Mariyamman Temple Neelagiri	1.17	SW
Karumariyamman Temple	2.43	SSW
Mother Mary Church	0.18	S
St. Anthonys Church	0.39	S
Pavithra Agni Devalaya	0.72	N
Jai Hanuman Temple	6.32	NE
Angenyar Temple	8.21	NE
Vinayagar Temple	9.04	NE
Saibaba Temple	8.79	NE
FMPB Church Ulagam	8.21	E
Yesu Nommodu Jeba Veedu	3.35	W
Makkah Masjid	2.99	N
Masjid Uddanpalli	2.62	N

The risk to the project based on location of the cultural, religious and heritage sites is classified as 'LOW'.

3.5.4 Stakeholder Engagement

35. A stakeholder engagement plan will be developed for the project post investment in the project. The stakeholders shall include both internal and external stakeholders and the engagement plan will be inclusive of all relevant community stakeholder representatives.

36. Grievance mechanism for workers:

The construction work has not yet started, and the contractor is not yet finalized. However, a grievance redressal policy is proposed to be developed for the project at the site, project, and company level. The project GRM is described in detail in the report under section 5 of this report.

37. Provision of welfare facilities for workers:

The construction work has not yet started, and the contractor is not yet finalized. It was understood that appointed contractor has to submit an EHS Plan which will be approved the Company and the EHS Plan will cover provision of welfare facilities to workers.

The risk to the project based on provision of welfare facilities for workers is classified as 'LOW'.

38. Prevention of child/forced Labour:

It was reported that the contractor appointed for construction must adopt TEPL's policies on 'Prohibition of Child/Forced Labor' which will be communicated as a part of contract agreement.

The risk to the project based on practices related to prevention of child/forced Labor is classified as 'LOW'.

39. Practices on Anti bribery and Anti-corruption:

It was reported the contractor appointed for construction must adopt TEPL's policies on Anti bribery and Anti-corruption which will be communicated as a part of contract agreement.

The risk to the project based on the practices on Anti bribery and Anti-corruption is classified as 'LOW'.

An overall risk given to the project due to Social Impacts is 'LOW'.

[The highest category assigned to any of the above-mentioned aspect will be the risk category assigned to the project.]

3.5.5 Green Certification

40. The project is planning for IGBC-Platinum green building certification.

3.5.6 Environment and Social Management System (ESMS)

41. The construction work has not yet started as the contractor is not yet finalized. The appointed contractor will develop an EHS Plan which will be approved the Company and the EHS Plan will cover the ES Management system to be developed at site.

3.5.7 Chance Find Procedure

42. The chance find procedure defines the actions to be taken in case any previously unknown heritage resources, such as archaeological remains and objects, are discovered during the construction, excavation, or operation of a project.

43. The IFC performance standard 8 on Cultural Heritage includes some guidelines on the chance find procedures. According to the IFC PS-8 chance find procedure, the Company is responsible for siting and designing a project to avoid significant damage to cultural heritage. When the proposed location of a project is in areas where cultural heritage is expected to be found, either during construction or operations, the company will implement chance find procedures established through the Social and Environmental Assessment.

44. The client will not disturb any chance finds further until an Assessment by a competent specialist is made and actions consistent with the requirements of this Performance Standard are identified.

45. The general procedure for a Chance Find case occurring at project site has been described below.

- i. **Discontinuation of work:** The work in progress shall be paused in the vicinity of the find until the concerned authorities are informed. The construction work shall resume only when the concerned authorities grant permission to do so.
- ii. **Informing higher authorities:** The site supervisor on duty shall be notified of the chance find, who shall then escalate the information further to higher authorities.
- iii. **Proper records:** The records of the find shall be well recorded with proper reporting and photos.
- iv. **Site isolation and security:** The site of location of the find and its vicinity shall be completely isolated and secured to prevent any damages to the find. Enough security shall be maintained surrounding the area till the concerned authorities take over.
- v. **Preliminary evaluation:** Once the archaeologists approach the site, the preliminary evaluation shall be performed through quick assessment for determining the value and importance of the find based on various parameters such as aesthetic, historic, scientific or research, social and economic values of the find.
- vi. **Recording and reporting:** The sites with minor significance shall be recorded by the Archaeologist as soon as possible to prevent causing any delays in the work. This should then be further reported to higher authorities such as the Ministry or the concerned agencies. The sites with high significance, the Ministry, or the concerned Archaeological agency responsible for the protection of National Heritage shall be immediately informed without a delay. The archaeologist on site shall properly record the details and photos of the finding and share it with the concerned authorities for its identification and thorough assessment.

Investigation by Ministry: The Ministry shall be responsible for investigating the matter at the earliest and submit a written response. This shall be followed by decisions on handling the find including its conservation, restoration, preservation, and salvage. In case the investigation is not performed in the earliest given time frame, the suspended construction works shall be authorized to resume without any further delay.

4 Mitigation Action Plan

4.1 Methodology of Action Plan

46. The E and S Action Plan (ESAP) for establishing compliance to EHS legal requirements guidelines will be provided.

The method of reading the E and S – Action Plan is as follows:

- a) The first column lists the non-compliance identified during the evaluation.
- b) The recommended actions for closing the non-compliance has been specified in the second column.
- c) The responsibility of implementation and required timeline is presented in the third and fourth columns.
- d) The fifth column assigns priority as High, Medium, Low, and Good Practice based on the nature of non-compliance identified.

The last column provides monitoring guidance (evidence to be checked on completion of the action).

4.2 Prioritization of Actions

47. The actions will be classified as ‘High’, ‘Medium’, ‘Low’ and ‘Good Practice’, to enable prioritization and planning of human and financial resources.

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

4.3 E and S Action Plan

#	Legal Compliances	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget
Occupational Health and Safety							
1.	• Building and Other Construction	The Company shall ensure that the	Developer/ Contractor	3-6 months	High	Copy of EHS Plan developed	Management Time – Human Resources

#	Legal Compliances	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Proposed Budget
	Work (BOCW) Rules <ul style="list-style-type: none"> Central Electricity Authority (CEA) Regulations Central Motor Vehicle (CMV) Rules 	contractor appointed develops and implements an EHS Plan as per BOCW, CEA rules and CMV Rules					cost- HR Department (Existing Personnel or outsource liaison officer 3 weeks- INR 1,50,000/-)
2.	<ul style="list-style-type: none"> Fire NOC Airport NOC 	The Company shall ensure that the Fire NOC and Airport NOC is obtained from the relevant authorities for the project.	Company / Contractor	3-6 months	High	Copy of NOC	Management Time – Human Resources cost (Existing Personnel or outsource liaison officer 3 weeks- INR 1,50,000/-)
Employee Welfare/ Social							
1.	<ul style="list-style-type: none"> BOCW Registration Contract Labour Registration/License Migrant Labour Registration/License Private Security Agency License 	The Company must ensure that BOCW registration, registration and license under Contract Labour Act, registration and license under Interstate	Company / Contractor / Sub-contractor	6 months	Medium	Copy of application of registration certificates and licenses	Management Time – Human Resources cost- HR manager HR Manager- INR 7,00,000 per annum

#	Legal Compliances	Recommended Action	Responsibility	Timeliness	Priority	Monitoring Mechanism	Proposed Budget
		<p>Migrant Workers Act is obtained by Contractor / Company / Subcontractor.</p> <p>The Security agency appointed on site shall obtain PSARA license.</p>					
2.	<ul style="list-style-type: none"> • Minimum Wages • EPF / ESIC Deductions • Employee Compensation Insurance • Child and Forced Labour Prohibition • POSH at Workplace 	<p>The Company must ensure that all workers on site are paid equal to or above minimum wages latest notification, contribution to EPF and ESIC is made, Employee Compensation Insurance is obtained, Child/forced labour is prohibited, and POSH policy and procedures</p>	<p>Company / Contractor / Sub-contractor</p>	<p>6 months</p>	<p>Medium</p>	<p>Copy of Wage register</p> <p>EPF / ESIC Contribution</p> <p>Compensation Insurance</p> <p>Policies on POSH, Child/forced labour</p>	<p>Management Time – Human Resources cost- HR manager</p> <p>HR Manager- INR 7,00,000 per annum</p>

#	Legal Compliances	Recommended Action	Responsibility	Timeliness	Priority	Monitoring Mechanism	Proposed Budget
		are established.					

4.4 Environment and Social Action Plan - IFC Performance Standards

#	IFC PS Requirement	Recommended Action	Responsibility	Timeliness	Priority	Monitoring Mechanism	Actual Estimate
1.	<ul style="list-style-type: none"> E and S Policy Identification of E and S risk and impacts Management Programs Roles and Responsibilities Emergency preparedness and response (EPR) system Monitor Effectiveness of Management Programs, Legal and Contractual Compliance Stakeholder engagement 	<p>The Company / Contractor must develop an E and S Policy, identify potential risk and impacts arising out of project operations on which management programs are to be developed by assigning roles and responsibilities to individuals, develop and EPR system which shall identify all the potential emergencies which may occur.</p> <p>Monitor management programs periodically.</p>	Company / Contractor	6-8 months	High	<ul style="list-style-type: none"> E and S Policy HIRA and Aspect Impact Register Management programs Roles and Responsibilities EPR Plan and mock drills Legal Register Grievance register 	Management Time and Third party consultant (3 Months- Professional Fees- INR 7,00,000)

#	IFC PS Requirement	Recommended Action	Responsibility	Timeliness	Priority	Monitoring Mechanism	Actual Estimate
		Identify stakeholders, develop stakeholder engagement plan and record and resolve stakeholder grievances.					
2.	<ul style="list-style-type: none"> • HR Policies and Procedure • Provide documented information to workers on their rights • Respective collective bargaining • Accommodation and basic service for migrant workers • Equal Opportunity • Retrenchment • Worker Grievance redressal • Discourage Child/Forced Labour • Provide Safe and Healthy Workplace 	<p>The Company / Contractor must develop HR policies and procedures and provide documented information to workers on their rights.</p> <p>Workers shall not be discouraged from making their worker unions</p> <p>Basic accommodation and welfare facilities shall be provided especially to migrant workers</p> <p>Equal opportunity shall be available for male and female workers, child/forced</p>	Company / Contractor	6-8 months	High	<p>HR Policy and Procedures</p> <p>Accommodation and welfare facilities</p> <p>Clean and safe workplace and practices</p>	<p>Management Time- HR Department</p> <p>HR Manager- INR 7,00,000 per annum</p>

#	IFC PS Requirement	Recommended Action	Responsibility	Timeline	Priority	Monitoring Mechanism	Actual Estimate
		labour shall be prohibited, and a safe healthy workplace shall be provided.					
3.	<ul style="list-style-type: none"> Resource Efficiency – Energy and Water Avoid and reduce release of pollutants Stockpiling of Materials Land and Vegetation Management 	<p>The Company / Contractor must adopt water and energy conservation practices and avoid/minimize release of pollutants from its operations</p> <p>Storage of construction material will be confined to work sites in a way to ensure that there is no obstruction to natural drainage pattern, efficient drainage is maintained</p> <p>A contingency plan will be developed to prevent the release of any hazardous material during the handling, storage, use or</p>	Company / Contractor	6-8 months	High	<p>Water/Energy conservation practices</p> <p>Pollution prevention practices</p>	<p>Management Time</p> <p>Full time Environmental Officer- INR 8,00,000/- per annum</p>

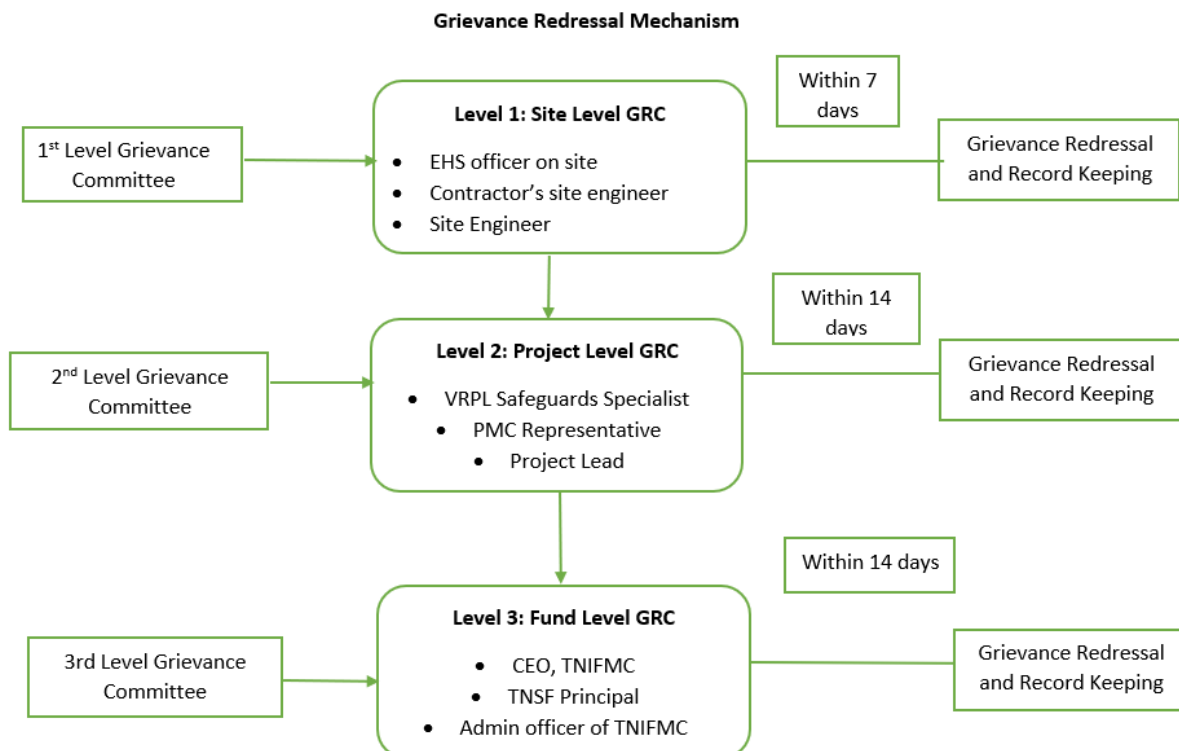
#	IFC PS Requirement	Recommended Action	Responsibility	Timeliness	Priority	Monitoring Mechanism	Actual Estimate
		<p>spillage as per Manufacture, Storage and Import of Hazardous Chemical (Amendment) Rules</p> <p>Excavated excess earth/soil (cut and filling), will be disposed in an authorised/identified landfill or disposal area.</p> <p>All reasonable measures will be undertaken to ensure that no native fauna is harmed or placed at risk during the course of the clearing activities</p>					
4.	<ul style="list-style-type: none"> Consider, avoid, and minimize risk to third parties Collaborate with affected communities Traffic Safety 	<p>The Company / Contractor shall ensure that no negligible risk to third party shall be caused due to company operations.</p> <p>Traffic safety measure shall be followed</p>	Company / Contractor	6-8 months	High	Periodic monitoring records / management procedures developed as part of E and S management system.	<p>Management Time-Hire Full time Safety Officer</p> <p>INR 7,00,000/-</p>

#	IFC PS Requirement	Recommended Action	Responsibility	Timeliness	Priority	Monitoring Mechanism	Actual Estimate
	<ul style="list-style-type: none"> • Access restriction • Remove hazardous conditions 	<p>within and outside the site.</p> <p>The site shall be barricaded from all sides to ensure access control and all hazardous conditions shall be removed/resolved immediately.</p>					

5. Grievance Redressal Mechanism

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

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



50. The grievance resolution process, along with the log of grievances received and their resolutions provided will be periodically reviewed by the PMC team.

51. The Grievance Redressal Mechanism (GRM) shall be aligned to the World Bank and ADB's approach to grievance redressal in projects.

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

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

- a) There will be a nomination of one Field Level Grievance Redressal Officer by the contractor in consultation with Project Lead and ESG team of TNSF. The ESG Analyst and Project Lead shall conduct a rapid review of contentious issues/ disputes related to the project such as, land ownership/rights, ethnic/community rights, or labor issues, and related stakeholders, relying on existing information from the project, relevant government departments and community around project site.
- b) The review will map who the key stakeholders to these issues are and what the nature of the debate is (informed, polarized, etc). Attention will be paid to the local dispute resolution culture and, particularly, to the capacity and track-record of stakeholders to settle disputes through mediation or constructive negotiation.
- c) There will be a nomination of one Management Level Grievance Redressal Officer by the Management in consultation with Project Lead and TNSF.
- d) The names, positions/designations, contact numbers and email of the Field Level, Management Level and Fund Level GROs will be displayed prominently in local language as well as in English, at the entrance to the project site.

Step 2: Receiving of grievances and complaints

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

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

Step 3: Resolution of grievances and complaints

- a. Grievances will be categorized by the Field Level GRO as high, medium and low priority according to the type of issue raised (e.g. physical and economic displacement, grievance from indigenous population, inconvenience caused by vehicular movements, accidents, near-misses, pollution, etc.) and the impact of the project on the environment/aggrieved party.
- b. A high priority grievance may be those that can have an impact beyond the activity period and the impact may be irreversible if not acted upon immediately; medium priority grievances are those where the impact is fairly moderate and can be reversed with corrective measure; low priority grievances are those which are short-term and can be resolved through bare minimum or minor corrections.
- c. Based on this categorization and seriousness of the issue raised, the Field Level GRO will prioritize the complaints for appropriate follow up action.
- d. The Field 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 Management level, with the involvement of the Management Level GRO.
- g. The function/ department will revert to the Field GRO with their response as soon as possible but not later than 7 days of receipt of complaint, including any action deemed necessary, along with the site head's approval for the same.
- h. In case, the Field Level GRO is not able to resolve the grievance, the grievance will be submitted to Management Level GRO and the total time to resolve should not more than 7 days (including Field Level and Management Level GRO).
- i. In case, after 7 days, if there are any unresolved issues, the complaint will be transferred to the Fund-Level Grievance Redressal Committee for resolution within the next 7 days.
- j. The Field Level GRO will be accountable for the timely closure of all the grievances received from the external stakeholders at the site and those affected by the project at project site.
- k. The Field Level GRO will communicate the response and action taken to the aggrieved party and obtain their acknowledgement.
- l. Basis the acknowledgement received from the aggrieved party, the Field Level GRO will close the complaint in the grievance log.
- m. The grievance log will be shared by the Field Level GRO with the Management Level GRO and Project Lead of TNSF on fortnightly basis.

- n. The grievance log will also be included in the quarterly project progress reports submitted to TNSF's ESG Team.
- o. The Project Lead in consultation with the Field Level GRO, Management Level GRO and Fund Level GRC will ensure that all the grievances are closed within the quarter.
- p. The site will maintain at a minimum, a database on the following metrics:
 - i. Number of complaints received
 - ii. Number of complaints resolved
 - iii. Details of the complaints that have gone to mediation (through arbitration or involvement of other parties like – community representatives, legal representatives, TNSF legal counsel, etc.)
 - iv. Grievance and complaints received from investors
 - v. The names displaying the Grievance Committee Members at Project and Site Level

The sample grievance redressal form is provided under Annexure 5.

6. Conclusion and Way Forward

53. Based on the due diligence undertaken for the project, which included site visits, no major ESG risks to the proposed project was noted. Overall, 15 ESG issues were evaluated using the ESG risk rating tool of which 14 are considered as **material ESG risks** for the proposed project. **Project risk level is 44.44%**. Hence, it is **medium-high risk level project**. Key findings of the study in connection to environmental, social and governance issues are:

- The due diligence confirms that land was not acquired in anticipation of the project. No private land acquisition is involved as the land is leased from TIDCO by Vidiyal Residency Pvt Ltd.
- Based on the site visit undertaken, it is observed that the site is vacant and unused.
- The land parcel has a few dilapidated/unused existing structures, which are included as part of the land lease and will be demolished prior to construction.
- The project is not anticipated to have any direct or indirect impacts on the dignity, human rights, livelihood systems or territories, or natural or cultural resources that are used, owned, occupied, or claimed by indigenous peoples or their ancestral domain or assets.
- There is no human habitation, trees, or any other establishments on the proposed project site, as a result no dislocation, demolition of houses or structures will be required due to the construction activities
- No potential negative impact has been identified for this project.

Way Forward

54. Further consultations will be carried out with surrounding communities on the progress and impacts of the construction activities on the local community and the grievance redressal mechanism to be set up for the project and included in the updated Due Diligence Report.

Annexure 1 - Photos



Photo of the land parcel. The land has no access control so has open access to all.



Photo of the land parcel



Road on north side. Unbarricaded land.



Tree numbering done on site.



Rain water harvesting planned in this area



Photo of the land parcel



Some pre-existing temporary unused structures belonging to TIDCO on site which are to be demolished. (The structures have also been transferred as part of the land lease and are unused structures)

Annexure 2 - List of documents reviewed

Land Alienation Order
Land Delivery Receipt to TIDCO
Lease Document
Satellite Image
Environmental Clearance

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

A. 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.

B. Information on subsection/section:

- District/administrative name: Krishnagiri District
- Location (km): 46.6 km from district HQ
- Civil work dates (proposed): _____
- Technical description: The project involves the construction of industrial housing facilities with 14,308 beds in two phases [REDACTED] Krishnagiri.

C. Screening Questions for Involuntary Resettlement Impact

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

Probable Involuntary Resettlement Effects	Yes	No	Not Known	Remarks
Involuntary Acquisition of Land				
1. Will there be land acquisition?		√		The land for the project has already been leased from TIDCO for the purpose of this project. (Same response as above)
2. Is the site for land acquisition known?				
3. Is the ownership status and current usage of land to be acquired known?				The land has been transferred from TIDCO to the SPV (Vidiyal Residency) on a lease.
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?		√		The land is a barren land free from any habitation.
6. Will there be loss of agricultural and other productive assets due to land acquisition?		√		The land is classified as a barren land with vegetation.
7. Will there be losses of crops, trees, and fixed assets due to land acquisition?		√		
8. Will there be loss of businesses or enterprises due to land acquisition?		√		

9. Will there be loss of income sources and means of livelihoods due to land acquisition?		√		
Involuntary restrictions on land use or on access to legally designated parks and protected areas				
10. Will people lose access to natural resources, communal facilities, and services?		√		
11. If land use is changed, will it have an adverse impact on social and economic activities?		√		
12. Will access to land and resources owned communally or by the state be restricted?		√		
Information on Displaced Persons:				
Any estimate of the likely number of persons that will be displaced by the Project? <input type="checkbox"/> No <input type="checkbox"/> Yes [√] N/A				
If yes, approximately how many?				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? <input type="checkbox"/> No <input type="checkbox"/> Yes [√] N/A				
Are any displaced persons from indigenous or ethnic minority groups? <input type="checkbox"/> No <input type="checkbox"/> Yes [√] N/A				

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

Risk screening questions	Yes	No	Not sure	Remarks
1. Will project preparation be affected by the inability of experts/consultants, to visit the project site because of the pandemic?		√		The consultants have visited the site and drafted the necessary project documents.
2. Is the project likely to face challenges in achieving meaningful consultation because of the pandemic? If yes, please clarify the types of consultations to be affected and at what stages in social safeguards planning and implementation. <i>Examples: Project consultants are unable to travel to the project site and meet with affected people for RP planning; the project will face challenges in conducting with communities, etc.</i>		√		
3. Is the project likely to face challenges in preparing safeguards assessments/planning instruments and/or implementing social safeguards plans because of the pandemic? Please be as specific as you can in the remarks section. <i>Example: The project might face challenges in conducting inventory of assets/DMS, arranging for adequate valuations, or conducting other</i>		√		

<i>related due diligence (e.g., cadastral mapping or title search) due to COVID-19 restrictions.</i>				
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Note: The project team may attach additional information on the project, as necessary.

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

1. Introduction

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

2. Information on project/subproject/component:

- a. District/administrative name: Krishnagiri District
- b. Location (km): 46.6 km from district HQ
- c. Civil work dates (proposed): _____

3. Screening Questions for Indigenous People Impact

KEY CONCERNS (Please provide elaborations in the Remarks column)	YES	NO	NOT KNOWN	Remarks
A. Indigenous People Identification				
1. Are there socio-cultural groups present in or using the project area who may be considered "tribes" (hill tribes, scheduled tribes, tribal people), "minorities" (ethnic or national minorities), or "indigenous communities" in the project?		√		The land is uninhabited. The project is not anticipated to have any direct or indirect impacts on the dignity, human rights, livelihood systems or territories, or natural or cultural resources that are used, owned, occupied, or claimed by indigenous peoples as their ancestral domain or assets.
2. Are there national or local laws or policies as well as anthropological research/studies that consider these groups present in or using the project area as belonging to "ethnic minorities," scheduled tribes, tribal people, national minorities, or cultural communities?		√		
3. Do such groups self-identify as being part of a distinct social and cultural group?		√		
4. Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?		√		

KEY CONCERNS (Please provide elaborations in the Remarks column)	YES	NO	NOT KNOWN	Remarks
5. Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?		√		
6. Do such groups speak a distinct language or dialect?		√		
7. Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?		√		
8. Are such groups represented as "indigenous people," "ethnic minorities," "scheduled tribes," or "tribal populations" in any formal decision-making bodies at the national or local levels?		√		
B. Identification of Potential Impacts		√		
9. Will the project directly or indirectly benefit or target indigenous people?		√		
10. Will the project directly or indirectly affect indigenous people' traditional sociocultural and belief practices (e.g., child-rearing, health, education, arts, and governance)?		√		
11. Will the project affect the livelihood systems of indigenous people (e.g., food production system, natural resource management, crafts and trade, employment status)?		√		
12. Will the project be in an area (land or territory) occupied, owned, or used by indigenous people, and/or claimed as ancestral domain?		√		
C. Identification of Special Requirements Will the project activities include:		√		
13. Commercial development of the cultural resources and knowledge of indigenous people?		√		
14. Physical displacement from traditional or customary lands?		√		
15. Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, and spiritual uses that define the identity and community of indigenous people?		√		

KEY CONCERNS (Please provide elaborations in the Remarks column)	YES	NO	NOT KNOWN	Remarks
16. Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		√		
17. Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		√		

4. 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.

5. COVID-19 Risk Screening for IP Impact Assessments

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

Annexure 5: Sample Grievance Form

(To be made available in Local Language-Tamil)

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

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

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

For Official Use only

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

Annexure 6: Focus Group Discussions

Minutes of meeting for informal interview conducted with nearby villagers

Interview Date: 1st November 2022

Participants:

Vidiyal Residency Private Limited (“VRPL”)	Mr. Sambhav Jain
Villagers	From Lallikal, Nagamangalam, Neelagiri, Kompalli, Kothoor villages

Villagers Profile:

Males	Females	Total
10	5	15

A public consultation was held at VRPL site on 1st November 2022 to ascertain the impact of upcoming housing facility on the nearby village and its residents.

Below are the major highlights that are recorded based on the discussions.

Highlights:

- Villagers said that they are aware about the development work of a project, and since the project is on the land owned by government, they don't have any issues. However, they requested to make sure that the project doesn't affect their land in future because of any discharge or any other activities in the premises.
- Villagers sought information on the people who will be residing in the facility, and it was communicated to them that the facility is majorly for the young girls considering their safety and well-being. It was appreciated by the locals, and they also asked that if they may get jobs in the project site once the construction is complete. It has been clarified to them that the local villagers would be given preference in recruitment for any roles required for the project.
- Local people informed that because of this project they are already benefitting monetarily from the project: Few of them got employment opportunities (in construction work) and few of them are setting up small kirana stores to support workers at the site, and few of them are selling snacks at the site.
- Villagers requested the company to look into the prospect of improving condition of the present road leading to the main road and increase the width of the road as the traffic is expected to increase post the project. They have been informed that a proposal for this is already under consideration with the government authorities and the road is expected to be widened.
- Villagers also requested for installation of streetlights or any other measures to improve visibility during night, as currently there is no visibility and as the road condition is not good.
- Villagers requested the company to create avenues of employment. The same shall be considered by the Company favorably.

INFORMAL PUBLIC CONSULTATION

VIDIYAL RESIDENCY PVT LTD

CONSULTATION INFORMATION

CONSULTATION SUMMARY							
S. No	Date / Time / Venue of Meetings	Stakeholders	No. of Participants			Issues discussed	Project responses
			Male	Female	Total		
1		Local Community /Affected persons/ civil society/ administration etc					
2							
3							
4							

Attendance Sheet

Sl. No.	Name	Gender	Area/ location	Contact No	Signature
1	N. Thirumalash	Male	Lalikkal	98944444 ⁶⁴¹	N. Thirumalash
2	T. Aruna	Female	Lalikkal	9047413355	T. Aruna
3	S. Ajith	Male	WKA. Ag.	9360875585	S. Ajith
4	Gouinder Raj	Male	Calicut	789547452	Gouinder Raj
5	P. Manivannan	Male	Nagamangalam	9025416538	Manivannan
6	Raja N	Male	Nagamangalam	9442119233	Raja N
7	B. B. B. B.	Female	W. N. S. S.	9965313005	B. B. B. B.
8	B. B. B. B.	Male	W. N. S. S.	812410820	B. B. B. B.
9	Thirukesh Kumar	Male	Neelagiri	7094547211	Thirukesh Kumar
10	P. B. B. B.	Male	W. N. S. S.	9698656566	P. B. B. B.
11	Narayanappa	Male	Kompalli	965541519	Narayanappa
12	P. Murugesh	Male	Lalikkal	9965307336	P. Murugesh
13	L. Sneha	Female	Lalikkal	9894317368	L. Sneha
14	Sampurna R	Female	Lalikkal	9025824779	Sampurna R
15	B. B. B. B.	Female	Kothoor	7639493389	B. B. B. B.

Attachments: Photos of Consultation

Photos

