

# Due Diligence Report

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

### Working Women's Hostel in Hosur

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## ABBREVIATIONS

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

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## I. INTRODUCTION

### A. Background

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

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

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

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

### B. Project objectives and scope of work

4. The objectives of conducting an ESG due diligence is to assess and rate the ESG risks associated with the proposed project and suggest suitable mitigation measures against the identified risks. This shall help Tamil Nadu Shelter Fund (TNSF) to make an objective decision on the proposed investment/target.

5. The scope of work is:

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

- c. Whether there is any expected loss of agricultural or productive land due to this project
  - d. Surrounding land use
  - e. Area geology, and potential soil and groundwater contamination due to construction
  - f. Loss of biodiversity due to land clearing, waste disposal
  - g. Sources and availability of water (ground/surface),
  - h. Impact of construction and project on water availability in the locality
  - i. Potential impact on soil and water bodies nearby
  - j. Effluents – type and quantity of effluent generated during and post construction, are there any hazardous effluents generation, is there an effluent treatment plant, effluents (quality and quantity) and pollution prevention measures in line with local laws, standards, and regulations.
  - k. Proximity to sensitive areas such as environmental, cultural, and heritage sites
  - l. Adverse impact of air, water, and aesthetic pollution on the neighborhood, environmental, cultural, and heritage sites due to project activity
  - m. Loss of accessibility to the local community
  - n. Past track record of the company – Have there been any serious environmental or social incidents in the past
  - o. Liabilities - project exposure to potentially significant environmental liabilities, such as those arising from land or groundwater contamination, related to the company's past or ongoing operations. Company exposure to potentially significant health and safety liabilities, such as those from ongoing or future claims from negatively affected workers and/or communities.
- (iii) On-site consultations with relevant stakeholders such as the local community, key regulatory authorities, etc.
- (iv) Review with respect to the site on these mandatory topics:
- a. Past legal non-compliances/ incidents of violation of laws.
  - b. Adverse media articles.
  - c. Any voluntary or involuntary resettlement (physical and economic) scenarios due to the project.
  - d. To assess whether designs are certified by licensed structural engineers for their structural stability and safety including against seismic and wind forces.
  - e. Project-related regulatory documents – consents/ permits/ licenses obtained so far against those applicable for the project.
  - f. Assess the capacity of the project owner/ to deal with the environmental and social risks and impacts and implement appropriate training and capacity-building measures for safeguards compliance.
  - g. As per ADB safeguard requirements identify potential direct, indirect, cumulative, and induced environmental impacts on and risks to physical, biological, socioeconomic, and physical cultural resources and determine their significance and scope, in consultation with stakeholders, including affected people and concerned NGOs.
  - h. Review of any established baseline for air, water, and noise levels, common natural resources, livelihoods, social interactions, support systems, and other social and cultural characteristics by the project owner/promoter/sponsor.

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

### C. Applicable reference standards/ frameworks

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

### D. Approach and Methodology

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

- (i) **Review of documents:** Reviewed the policies, maps of the project site, and the site-specific Environmental Management Plan (EMP).
- (ii) **Stakeholder identification:** Based on a review of the DFR and consultations with TNSF, identified the relevant stakeholders who might impact or get impacted by the project activities. The identified stakeholder includes the residents in the community, contractor, vendors, PMC, TNWWHCL, working women, among others.
- (iii) **Site visits:** Conducted a half-day site visit at the project site in Hosur on 2<sup>nd</sup> November 2022.
- (iv) **Stakeholder consultations:** Carried out discussions with the relevant project-related stakeholders like- the District Social Welfare Officer, an officer from govt. revenue department and residents to obtain additional information beyond the statutory documents-
  - a. **Investee company (TNWWHCL)**
  - b. **Relevant stakeholders at Hosur**
- (v) **Reporting:** This report presents key social issues and risks and mitigation measures for high-risk issues, if any.

7. This Social Due Diligence report is prepared with the objective of confirming the project was free of involuntary resettlement impact such as land acquisition, physical displacement, economic displacement, adverse impact on livelihood, common properties, indigenous peoples impacts or any other social safeguards implications, prior to construction and remains so, post-construction. The due diligence is based on a review of land records, stakeholder consultations and field visit to the proposed project location. This document describes the findings of the due diligence and confirms that the working women's hostel project in Hosur does not trigger safeguards requirements 2 (involuntary resettlement) and safeguards requirements 3 (indigenous peoples) of ADB's Safeguards Policy Statement 2009.<sup>1</sup>

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

## II. PROJECT OVERVIEW

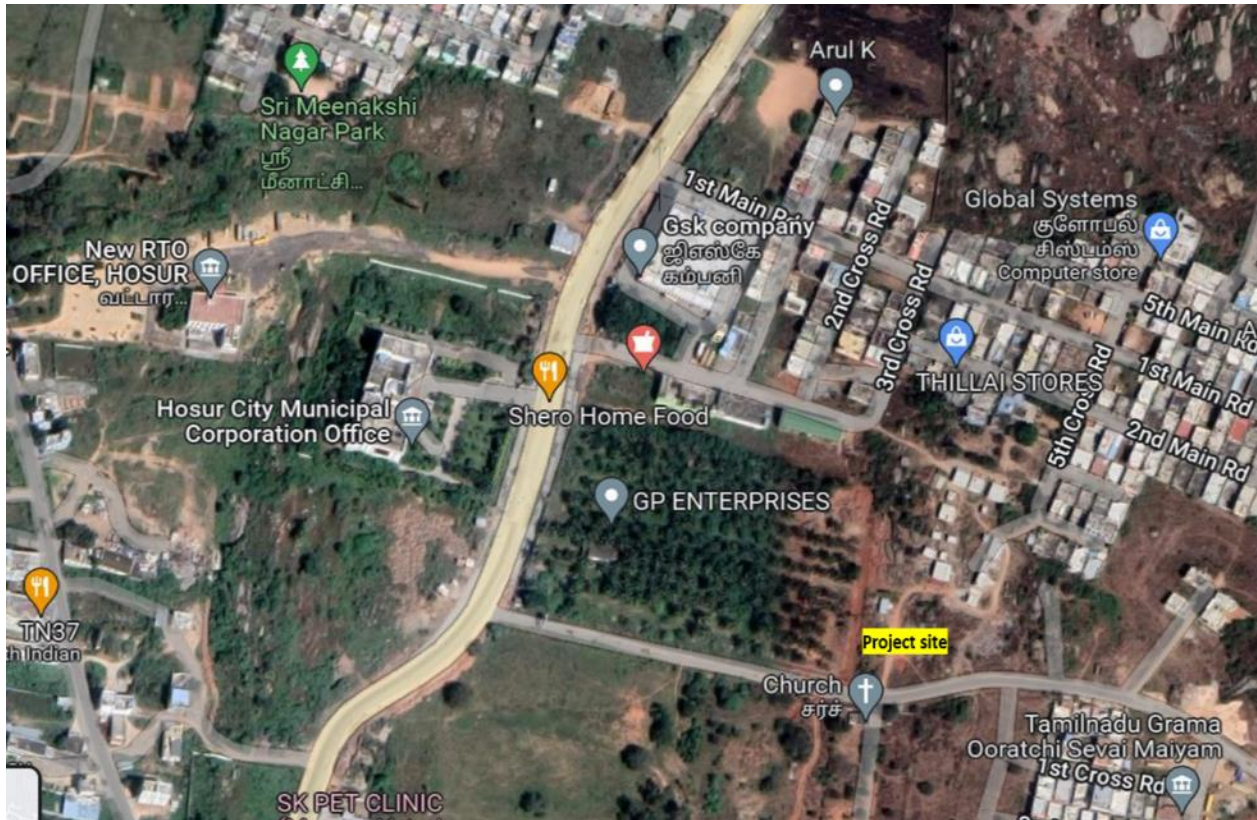
### A. About the project developer

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

### B. Description of the proposed project site

Parameters	Description
Project details incl. capacity	Construction of working women's hostel building (one building G+4 level). Total proposed beds: 166
Facilities	Facilities include ramps for the differently abled person, 24*7 security, solar water heaters, solar PVs, STP, RO drinking water, etc.
Location	The proposed project site is in Chennasandiram village, Hosur taluka of Krishnagiri district in Tamil Nadu
Survey no	5/2
Total area	1,575 sq. meter
Topography	During the site inspection it was observed that the subject site has highly rocky terrain (Photos in annexure 1). However, the exact site boundary is not demarcated on the ground.
Present land use	During the site visit, it was observed that the proposed project site is a vacant land and is mostly being used for dumping trash. Local residents pass through the site as a shortcut to reach the main road.
Past land use	As informed by the staff of District Social Welfare Office, the site has been with the govt. (revenue dept.) for a long period of time, it is a non-agricultural land and has not been used for any other purpose so far.
Boundary	Northern side: Residential area Southern side: 15 ft wide road Eastern side: Vacant land (belonging to the govt.) Western side: Private land with a cement compound wall
Surrounding area	1. Hosur city municipal corporation office 2. Church 3. Tamil Nadu Grama Ooratchi Sevai Maiyam (County government office)
Access road	The proposed site has direct access to a 15 ft wide road which further connects to Hosur- Malur Road (NH-207)
Land acquisition	Based on the documents available, it is understood that land has been transferred from the revenue department to the social welfare department. Based on the stakeholder consultation, no concerns were noted with respect to the land transfer process. Also, the land has not been subject to any disputes/ claims/ arbitration in the past. The land is leased to the TNWWHCL for a period of 28 years. (Ref Appendix 9).

### Google image of the proposed project site



#### About the site:

9. The proposed project site is in Hosur taluka of Krishnagiri district in Tamil Nadu. Although the location is present amidst the residential development which is in proximity to the municipal corporation office, the subject site is on the outskirts of the city which is slightly away from the manufacturing industry/ SIPCOT area. The site is located close to requisite infrastructure such as local markets, hospitals and enjoys good connectivity via public transport facilities with the manufacturing cluster of SIPCOT, where majority of the consumers are employed.

10. The demand for working women's hostel is driven by the employees, especially trainees employed at manufacturing firms such as TVS, Titan, Ashok Leyland etc. Other sources of demand are hospitals in the proximity of the site where women work in variable shifts and proximity to the workplace is of paramount importance.

#### Land Ownership:

11. The land belongs to the Social Welfare and Women Empowerment (SW&WE) department of Tamil Nadu (Ref Appendix 9). The government order to build the hostel and land ownership to the SW&WE department was announced in September 2022. The associated facilities for the project like water, road and sewerage are all provided by the Hosur Municipality. The land is leased to TNWWHCL, and the land lease documents were executed in July 2025 (Appendix 9).

### C. ADB Safeguard Requirements

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

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

### Consultations

13. Discussions were held with the contractor, site engineers, community and other workers on the site on 04.02.2025. The discussion with the available stakeholders revolved around the availability of amenities such as water and electricity, presence of water bodies, environmentally sensitive zones around the site etc. The stakeholders were also made aware of the availability of a grievance redressal mechanism. The interaction with the plumbers, electricians on the safety training by the contractors were discussed along with the awareness of safety protocols were discussed.

14. On 1.11.2022 discussions were held with the Panchayat Secretary; District Social Welfare Officer (DSWO), Krishnagiri District and residents living nearby and the church members. The discussion with the available stakeholders revolved around the past and present land use, any arbitration/ disputes/ claims around the land, any concerns raised by the local community, availability of amenities such as water and electricity, presence of water bodies, environmentally sensitive zones around the site etc. The stakeholders were also made aware of the availability of a grievance redressal mechanism which will be available to them at all times. Consultation details and photographs are given in Appendix 5.

## III. KEY FINDINGS SECTION

### A. Social

S. No	Topic	Key findings
S. 1	Safety & security	The project site is located on government-owned land and enclosed by a municipal corporation office, church, and residential houses. Based on the interaction with the residents and DSWO, no safety and security concerns have been reported. Hence the overall risk is considered as low.  From the safety and security of workers' perspectives, the site will be manned by security guards 24*7. The PMC along with the contractor will be responsible for ensuring the overall health & safety of all the

S. No	Topic	Key findings
		workers, and maintenance of labor camps. The PMC has standard operating procedures in place for activities to be conducted on site. As informed, the PMC follows the recommendations of ISO 45001.
S. 2	Community concerns	Based on the interactions with members from the nearby community as well as the DSWO, the response towards the upcoming project was generally positive and no immediate concerns were raised by the community.
S. 3	Past legal non-compliance	This is a greenfield project and construction activity has been completed. The hostel received a go-ahead from the govt. in the form of govt. order dt. 30/09/2022. (Appendix 7)
S.4	If the easement is utilized within an existing Right of Way (ROW) being used by local people Whether a new RoW needs to be created for access to the project site or to maintain access to adjoining sites	The site is located adjacent to the National highway. Access to the project site is through this highway and does not require the creation of ROW. Access to nearby residents is also available through this highway and does not require access through the project site. However, the project area is currently being used by the residents as a temporary access road. The consultation by the revenue department with the local residents took place before the construction commencement. The local community were asked to take a detour and use the existing road which is a quick detour of 200 m.
S.5	Number of persons that will be displaced, loss of crop or income by the Project	The project land was empty land with no evidence of previous habitation. Hence no person were displaced. The project site was not agricultural land or had any commercial activity being carried out which can lead to loss of income.

## B. Governance

S. No	Topic	Key findings
G. 1	Corporate level governance policies on: <ul style="list-style-type: none"> <li>Governance Structure</li> <li>Prevention of sexual harassment</li> <li>Anti-bribery and corruption, Child labor</li> <li>Forced labor</li> <li>Whistle-blower</li> <li>Environment health and safety policies</li> </ul>	TNWWHCL has formulated certain policies in place around aspects such as anti-bribery & anti-corruption, forced/ compulsory labor, child labor, whistleblower, grievance redressal, and equal opportunity. The same would be applicable to the contractors working on the site as well. Crucial policies which are not currently in place include the prevention of sexual harassment of women and Health & safety policy.
G. 2	Grievance Redressal Mechanism	The project had a three-tier GRM structure and was activated through the project duration. (Refer Appendix 6)
G.3	Monitoring and reporting	As understood during the interactions, TNWWHCL in coordination with Tamil Nadu Police Housing Corporation will conduct internal environmental monitoring, and compliance review and prepare Quarterly Progress reports for the project site. All applicable legal requirements are identified and documented in the EMP. The contractor will be responsible for obtaining permissions and licenses.
G.4	Contractor management	TNWWHCL in coordination with TNPHC has developed and documented pre-qualification criteria for the selection of contractors. As mentioned in the tender document, the contractor is responsible

S. No	Topic	Key findings
		for preparing standard operating procedures for the execution of work on the project site.
G.5	Stakeholder engagement	The DD team interacted with the local stakeholders during the site visit. During the visit, the residents responded positively to the project. One stakeholder engagement was conducted during the end of construction period with the local community members, contractor, labour, vendors and electricians. Towards the end of construction, a stakeholder consultation with the contractor, electrician, neighbors, and labors was also held (Refer Appendix 9)
G.6	Consents/permits/clearances	The land lease agreement is executed. (Ref Appendix 9). All the other permits such as NOC from traffic police, fire NOC, structural stability certificate, NOC for groundwater, etc. has been approved and obtained.  Environmental clearance is not required for the project.
G.7	Adverse media articles	No adverse media article was found during the desktop research.

#### IV. ESG RISK RATING

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

16. The issues identified are based on the current project status and may evolve during the construction and operational phase. The overall risk rating is coming 30.21% which falls on "medium" risk on the project risk rating scale with an overall score of 70. The separate scores for social, and governance are discussed and provided in Appendix 8.

## V. GRIEVANCE REDRESSAL MECHANISM

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

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

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

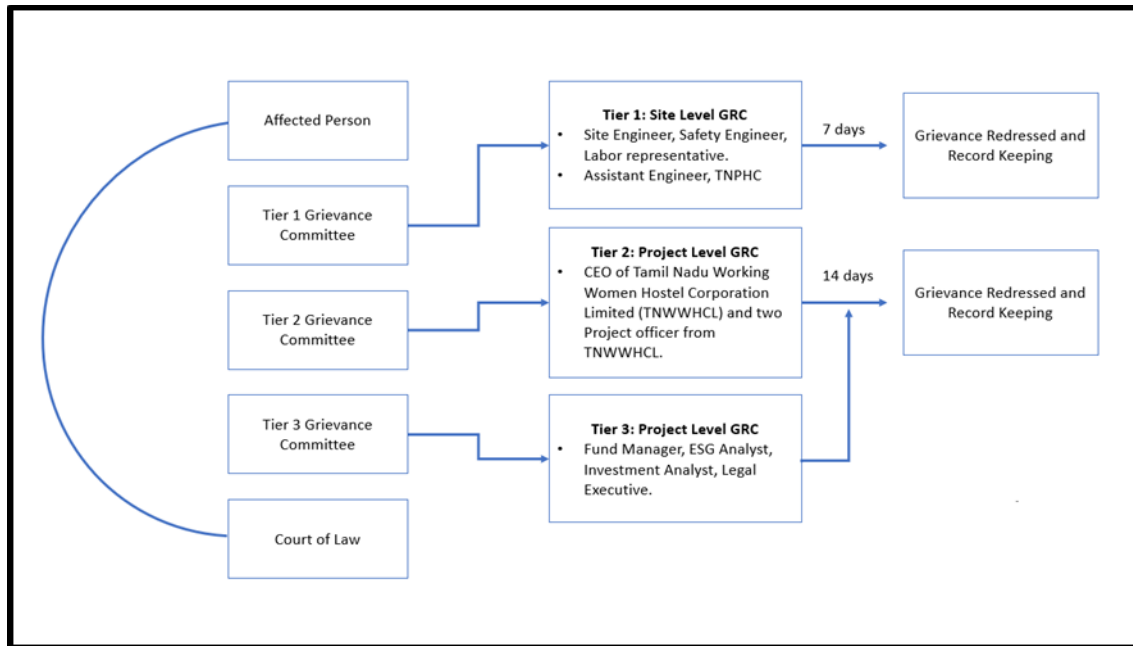
20. **Fund level.** If the grievance is not resolved in tier 2 level, the grievance will be referred to tier 3 committee at TNFIMC level. The grievance at this level must be resolved within 14 days of its receipt.

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

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

23. Periodic review and documentation of lessons learned: During the project, two stakeholder consultations were held. One consultation right before construction in 2022 and one before funding the project in March 2025 was conducted. The project was nearing completion, and no major feedback was received during the consultation (Ref Appendix 9).

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



## VI. CONCLUSION

25. The social Due Diligence study reveals that the potential impacts during the construction and operational phase of the project are very much understood and manageable i.e., Impacts can be avoided or minimized. The proposed working women's hostel is a green field project and construction is completed. The land acquired for the project was a rocky wasteland and here are no trees on the site. The land transfer is completed, and no disputes/ claims/ arbitrations have been noted and there was no physical and/or economic displacement of people. The project site is not located in environmentally or culturally sensitive areas.

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

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

28. The Social Due Diligence report confirms that the project was free of involuntary resettlement impacts such as land acquisition, physical displacement, economic displacement, impact on livelihood, common properties, indigenous people's impacts or any other social safeguards implications, prior to construction and remains so, post-construction. The due diligence confirms that working women's hostel project in Hosur does not trigger safeguards requirements 2 (involuntary resettlement) and safeguards requirements 3 (indigenous peoples) of ADB's Safeguards Policy Statement 2009.<sup>2</sup>

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

### Appendix 1: Photographs of the Project Site



Rocky terrain on site



Proposed site



Proposed site



Approach road to the site



Temporary accessway passing through the site



Residential blocks to the North

Private property to the West

Church to the South

**Appendix 2: List of Documents Reviewed**

- (i) Field Measurement Book (FMB) duly signed by PWD authorities, dt. 06/09/2019
- (ii) Approved building plan by the Hosur New Town Development Authority, Krishnagiri District, Hosur dt. 25/02/2022
- (iii) Detailed feasibility report by Knight Frank
- (iv) Policies on anti-bribery & anti-corruption, forced labor, child labor and grievance redressal

### Appendix 3: Involuntary Resettlement Impact Assessment

#### Introduction:

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

#### Information on subsection/section:

District/administrative name: Krishnagiri District

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

#### Screening Questions for Involuntary Resettlement Impact

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

Probable involuntary resettlement effects	Yes	No	Not Known	Remarks
<b>Involuntary acquisition of land</b>				
Will there be land acquisition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>		The land will be transferred from the social welfare dept.
Is the site for land acquisition known?				Not applicable
Is the ownership status and current usage of land to be acquired known?				The land is currently owned by the social welfare dept., and it is a rocky wasteland.
Will easement be utilized within an existing Right of Way (ROW)?				Not applicable
Will there be a loss of shelter and residential land due to land acquisition?				Not applicable
Will there be a loss of agricultural and other productive assets due to land acquisition?				Not applicable
Will there be losses of crops, trees, and fixed assets due to land acquisition?				Not applicable, as no land acquisition is involved. There are no trees or fixed assets on the site.
Will there be a loss of businesses or enterprises due to land acquisition?				Not Applicable.
Will there be loss of income sources and means of livelihoods due to land acquisition?				Not applicable.
<b>Involuntary restrictions on land use or on access to legally designated parks and protected areas</b>				
Will people lose access to natural resources, communal facilities, and services?		<input checked="" type="checkbox"/>		
If land use is changed, will it have an adverse impact on social and economic activities?		<input checked="" type="checkbox"/>		
Will access to land and resources owned communally or by the state be restricted?		<input checked="" type="checkbox"/>		
<b>Information on Displaced Persons:</b>				
Any estimate of the likely number of persons that will be displaced by the Project? <b>Yes [ ], No [ ], Not applicable [ ✓ ]</b>				
Are any of them poor, female-heads of households, or vulnerable to poverty risks? <b>Yes [ ], No [ ], Not applicable [ ✓ ]</b>				
Are any displaced persons from indigenous or ethnic minority groups? <b>Yes [ ], No [ ], Not applicable [ ✓ ]</b>				

## Appendix 4: Indigenous People Impact Assessment

### Introduction:

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

### Information on subsection/section:

District/administrative name: Krishnagiri District

Civil work dates (proposed): Not available at this stage

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

### Screening questions for indigenous people impact

Key concerns (Please provide elaboration in the 'Remarks' column)	Yes	No	Not Known	Remarks
<b>Indigenous people identification</b>				
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 people as their ancestral domain or assets.
Are there national or local laws or policies as well as anthropological research/studies that consider these groups present in or using the project area as belonging to "ethnic minorities," scheduled tribes, tribal people, national minorities, or cultural communities?				Not applicable
Do such groups self-identify as being part of a distinct social and cultural group?				Not applicable
Do such groups maintain collective attachments to distinct habitats or ancestral territories and/or to the natural resources in these habitats and territories?				Not applicable
Do such groups maintain cultural, economic, social, and political institutions distinct from the dominant society and culture?				Not applicable
Do such groups speak a distinct language or dialect?				Not applicable
Have such groups been historically, socially, and economically marginalized, disempowered, excluded, and/or discriminated against?				Not applicable
Are such groups represented as "indigenous people," "ethnic minorities," "scheduled tribes," or "tribal populations" in any formal decision-making bodies at the national or local levels?				Not applicable
<b>Identification of potential impacts</b>				

Key concerns (Please provide elaboration in the 'Remarks' column)	Yes	No	Not Known	Remarks
Will the project directly or indirectly benefit or target indigenous people?		✓		
Will the project directly or indirectly affect indigenous people' traditional sociocultural and belief practices (e.g., child-rearing, health, education, arts, and governance)?		✓		
Will the project affect the livelihood systems of indigenous people (e.g., food production system, natural resource management, crafts and trade, employment status)?		✓		
Will the project be in an area (land or territory) occupied, owned, or used by indigenous people, and/or claimed as an ancestral domain?		✓		
<b>Identification of special requirements. Will the project activities include the following ?:</b>				
Commercial development of the cultural resources and knowledge of indigenous people?		✓		
Physical displacement from traditional or customary lands?		✓		
Commercial development of natural resources (such as minerals, hydrocarbons, forests, water, hunting or fishing grounds) within customary lands under use that would impact the livelihoods or the cultural, ceremonial, and spiritual uses that define the identity and community of indigenous people?		✓		
Establishing legal recognition of rights to lands and territories that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		✓		
Acquisition of lands that are traditionally owned or customarily used, occupied, or claimed by indigenous people?		✓		

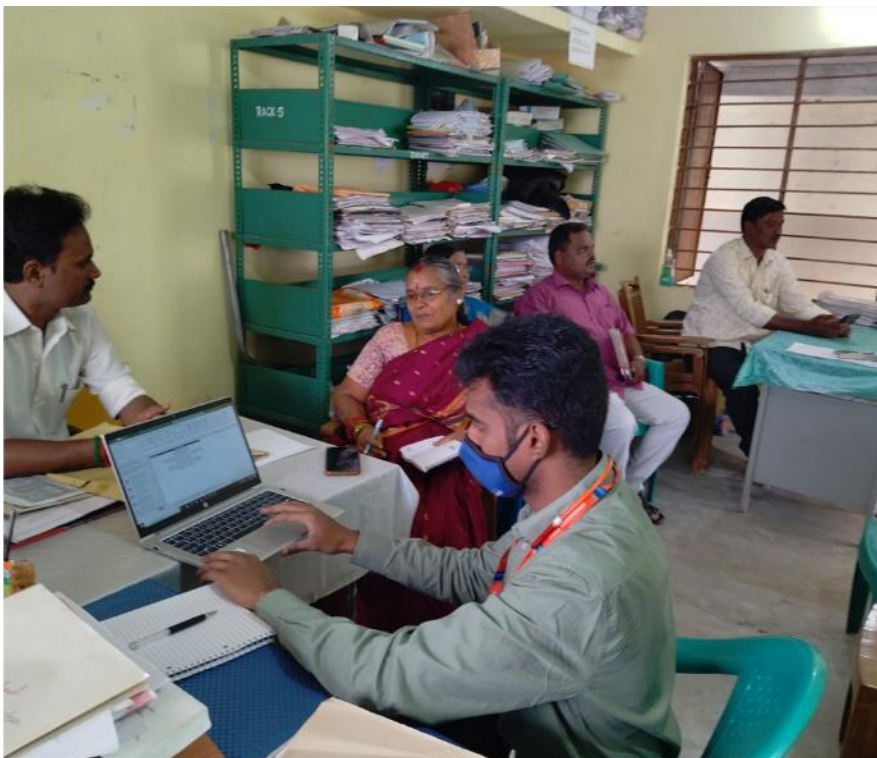
### Indigenous people impact

After reviewing the answers above, executing agency/ safeguard team confirms that the proposed subsection/ section/subproject/component (tick as appropriate)

has indigenous people (indigenous people) impact, so an indigenous people plan (IPP) or specific indigenous people action plan is required.

has No indigenous people impact, so no IPP/specific action plan is required.

## Appendix 5: Stakeholder Consultation Summary



**Stakeholder interaction on the site**

### Brief minutes of discussions held

Names of members present	Mr. Madhesh, Panchayat Secretary. Vijaya Lakshmi, District Social Welfare Officer (DSWO), Krishnagiri District, Tamil Nadu. Residents from the nearby locality as well as church
Date and time	01/11/2022 11:30 AM
Details of discussions held	The discussion with the available stakeholders revolved around the past and present land use, any arbitration/ disputes/ claims around the land, any concerns raised by the local community, availability of amenities such as water & electricity, presence of water bodies, environmentally sensitive zones around the site etc. The stakeholders were also made aware of the availability of a grievance redressal mechanism which will be available to them at all times.

Date	04-02-2025
Stakeholders	Contractor, Site Engineer, Plumber, Labourers and Neighbours
Consultation Summary and Discussions	The discussion with the available stakeholders revolved around the availability of amenities such as water & electricity, presence of water bodies, environmentally sensitive zones around the site etc. The stakeholders were also made aware of the availability of a grievance redressal mechanism. The interaction with the plumbers, electricians on the safety training by the contractors were discussed along with the awareness of safety protocols were discussed.

### Appendix 6: Approved Grievance Registration Form

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

**Tamil Form:**

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

**அதிகாரப்பூர்வ பயன்பாட்டிற்கு மட்டும்**

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

## Appendix 7: Govt. Order dt. 30/09/2022



### ABSTRACT

Social Welfare and Women Empowerment - Construction of Working Women Hostel with 166 beds in Hosur, Krishnagiri District -Sanction of expenditure - Orders - Issued.

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

G.O.(Ms) No.60

Dated: 30.09.2022

சுபகிருது, புரட்டாசி 13,

திருவள்ளூர்வராண்டு 2053.

Read:

1. G.O.(Ms).No.22, Social Welfare and Nutritious Meal Programme [SW3(1)] Department, dated 28.05.2019.
2. Government Letter No.14499/SW3(1)/2022, dated 27.10.2021.
3. From the Director of Social Welfare, Roc No.16395/ WW2(2)/ 2018, dated 30.05.2022 and 08.08.2022.

\*\*\*\*

#### Order:-

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

2. In Government Letter second read above, instruction have been issued to the Director of Social Welfare to send the proposal for financial sanction for the Working Women Hostels for which in-principal orders have been issued vide G.O (Ms) No.06, Social Welfare and Nutritious Meal Programme [SW3(1)] Department, dated 13.01.2015 along with the identification of land, approved building plan and actual requirement of fund etc., as per financial norms towards the construction of own building to these hostels.


3. In the letter third read above, the Director of Social Welfare has sent a proposal stating that the District Collector, Krishnagiri has permitted enter upon for a land measuring 0.15.75 hectares at Survey No. 5/2, Hosur Taluk in Krishnagiri District for construction of Working Women Hostel with build-up area of 2801.23 sq.mt. Hence 166 beds have been proposed based on the size of the land and the permissible Floor Space Index. The construction work of Working Women Hostel at Hosur, Krishnagiri District at the cost of Rs.12.37 crore is entrusted with the Tamil Nadu Police Housing Corporation. Of which Rs.7.42 crore as 60% will be met from the State fund and Rs.4.95 crore as 40% will be met from the Tamil Nadu Shelter Fund and therefore the Director of Social Welfare has requested the

(P.T.O)

## Appendix 8: Environmental Social and Governance (ESG) Rating

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

The issues identified are based on the current project status and may evolve during the construction and operational phase. The overall risk rating is coming 30.21% which falls on “medium” risk on the project risk rating scale with an overall score of 70.

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

### Environmental Risk Rating

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

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

### Social Risk Rating

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

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

## Governance Risk Rating

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


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

## Material ESG Risks for the Project are Listed below:

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

List of material topics	
Category	Material topics
<b>Environmental</b>	<ol style="list-style-type: none"> <li>1. Construction and other waste disposals</li> <li>2. Sources and availability of water</li> <li>3. Adverse impact due to air, water, noise, and aesthetic pollution on the environment, cultural &amp; heritage sites due to construction activities</li> <li>4. Availability and validity of the environmental clearance and other permits</li> </ol>
<b>Social</b>	<ol style="list-style-type: none"> <li>5. Non-compliance with labor laws</li> <li>6. Safety and security</li> </ol>
<b>Governance</b>	<ol style="list-style-type: none"> <li>7. Corporate-level governance policies</li> <li>8. Grievance redressal mechanism</li> </ol>

Appendix 9: Land Lease Document



भारतीय गैर न्यायिक  
एक सौ रुपये  
Rs. 100  
रु. 100  
ONE HUNDRED RUPEES  
भारत INDIA  
INDIA NON JUDICIAL

தமிழ்நாடு தமில்நாடு TAMILNADU  
21-2025  
Tamilnadu Working Women's  
Hostels Corporation Ltd.

28 JUL 2025

ED 847444  
M. KAIRUNISA  
STAMP VENDOR  
No: 18, Fanepet 2nd Street,  
Nandanam, Chennai - 600 035  
L. No: 1347/B2/2021  
Mobile : 9789906039

**LEASE AGREEMENT**

THIS Lease Agreement ("Agreement") is made at St.Thomas Mount on this 28<sup>th</sup> day of July 2025 ("Effective Date")

BETWEEN

**Commissioner of Social Welfare, Government of TAMIL NADU**, having its office at Commissionerate of Social Welfare, Kamarajar Salai, V. House, Lady Wellington College Campus, Chennai-600005 and acting through its Authorized Signatory, District Social Welfare Officer, Chengalpattu District, duly authorized by the Commissioner of Social Welfare hereinafter referred to as the "**Lessor**" or "**Department of Social Welfare**" which expression shall unless it be repugnant to the context or meaning thereof be deemed to mean and include its successors and permitted assigns of the **First Part**; (Authorize signatory )

AND

**TAMIL NADU WORKING WOMEN'S HOSTELS CORPORATION LIMITED**, a company incorporated under the provisions of the Companies Act 2013 and having its registered office at Commissionerate of Social Welfare, 2nd floor, Kamarajar Salai, V. House, Lady Wellington College Campus, Chennai-600005 hereinafter referred to as the "**Company**" or "**TNWWHCL**" or "**Lessee**" which expression shall unless it be repugnant to the context or meaning thereof be deemed to mean and include its successors and permitted assigns of the **Other Part**.

For TNWWHCL  
Chief Executive Officer

Document No. 2158/2025 of Book  
contains 26 Sheets / 1 Sheet

