




ENVIRONMENT, SOCIAL, GOVERNANCE (ESG) MANAGEMENT SYSTEM

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DOCUMENT HISTORY

Revision no.	Details	Effective Date	Initiator
00	Initial Adoption	16 December 2021	Kumud Ranjan

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ESG POLICY STATEMENT



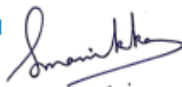
ESG POLICY STATEMENT

Radiance Renewables is committed to avoid, minimize, or mitigate adverse impacts while enhancing positive outcomes through effective ESG management. Radiance Renewables has adopted the following ESG Policy aligned with the ESG Policy Statement of EverSource Capital and ethos of Green Growth Equity Fund (GGEF):

- Abstain from investing in any Excluded Activity/Asset listed in Appendix A of Environmental Social Governance Management System (ESGMS) of GGEF.
- Implement an ESG Management System consistent with Environmental Social Governance Management System (ESGMS) of GGEF and allocate appropriate resources for effective implementation and compliance;
- Aim to ensure that the Company's employees and contractors understand and abide by the Company's policy commitments and investment standards encompassing matters of environmental, social and business integrity;
- Seek to invest in assets which have systems to assess ESG risks and adopt mitigation measures; and /or are committed to the formulation of systems to identify, monitor and manage ESG risks;
- Seek to invest in assets which are committed to fairness, inclusion and development opportunities for all relevant stakeholders;
- Seek to invest in companies and work with partners who are committed to prohibit bribery and corruption;
- Encourage and support continuous ESG improvements across all business activities;
- Uphold transparency to the Fund's investors on management of ESG aspects of all investments. Where appropriate, actively engage with stakeholders to understand challenges and take remedial steps to address issues;
- Contribute to the United Nations Sustainable Development Goals that align with the Fund's investment themes and Radiance Renewables impact strategy.

This Policy will be communicated to key stakeholders such as employees of Radiance Renewables, contractors and sub-contractors of Radiance Renewables and the Investment Manager of GGEF, EverSource Capital.

Signed




Effective Date

01/04/2021

Manikkan Sangameswaran, Executive Director
(for Radiance Renewables)

dd/mm/yyyy

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1. INTRODUCTION

Radiance manages environment, health & safety, social and governance (ESG) risks related to its prospective projects and deals in line with its ESG and EHS Policy commitments. The process of risk management integrates a comprehensive risk assessment procedure into Radiance's investment process with an objective to identify, assess, mitigate and monitor ESG risks and impacts across the project lifecycle.

1.1. Objective and Purpose

This management system framework has been developed with the objective of integrating ESG risk management into the Radiance's investment processes. The framework sets out a procedure to identify potential environmental, social and governance risks of potential deals and projects prior to investment and to institute monitoring mechanisms to supervise the ESG performance of these deals/projects during the term of the investment. Purpose of this framework is to outline steps involved in the process of conducting the ESG screening and to define the responsibility of parties involved in its execution.

1.2. Scope

This framework is applicable to all Radiance Renewables Pvt. Ltd. personnel involved in executing deals/projects as part of Radiance's investment process.

2. ABBREVIATIONS

- **AM**- Asset Management
- **CP**- Condition Precedent
- **CS**- Condition Subsequent
- **BTM**- Behind the Meter
- **BD**- Business Development
- **DISCOM**- Distribution Companies
- **ESG**- Environmental, Health & Safety, Social and Governance
- **EFR**- External factor review
- **ESGAP**- ESG Action Plan
- **ESMP**- EHS Social Management Plan
- **ESGDD**- ESG Due Diligence
- **EDD**- Environment Due Diligence
- **ESIA**- Environment and Social Impact Assessment
- **GC**- Group Captive
- **GRM**- Grievance Redressal Mechanism
- **GGEF**- Green Growth Equity Fund
- **HT**- High Tension
- **HOTO**- Handover Takeover
- **MW**- Mega Watt peak
- **OA**- Open Access Solar Projects
- **PD**- Project Development

- **PM-** Project Management
- **SOP-** Standard Operating Procedure
- **SEP-** Stakeholder Engagement Plan
- **T&D-** Transmission and distribution


3. IMPORTANT TERMS AND DEFINITIONS

- **Behind-the-Meter/Rooftop** solar project provides power that can be used on-site without passing through a DISCOM meter.
- **Front-of-meter** solar projects feed power at the HT transformer level and the power so injected may or may not be consumed by the same customer depending on the customer load.
- **OA** solar projects enables large consumers with contract demand of more than 1MWp have access to the T&D network, who aim to obtain electricity from suppliers other than the local DISCOM.
- **Group Captive solar** projects are arrangements through which a solar power developer sets up a power project for collective use of multiple industrial or commercial consumers who collectively have 26% equity in the project and consume a minimum of 51% of the total power produced by such Group Captive power plant.
- **Risk** is defined as a situation involving exposure to danger.
- **Red Flag Issues** are material factor(s) or issue(s) identified during the due diligence or risk screening which may cause party (ies) to withdraw from a deal.
- **Hazards** is any object, situation, or behavior that has the potential to cause injury, ill health, or damage to property or the environment
- **ESGDD** is a process of undertaking an investigation, audit, or review to identify, consider and address the potential ESG impacts and risks relating to a deal or project under consideration.
- **ESIA** is a process for predicting and assessing the potential environmental and social impacts of a proposed project, evaluating alternatives and designing appropriate mitigation, management and monitoring measures.
- **ESG Categorization** reflects the magnitude of environmental, health & safety, governance, social risks and impacts.
- **Exclusion List** lists the types of projects in which Radiance does not invest, either directly or indirectly.
- **Portfolio Company** is an investee company in the portfolio of GGIF.
- **Stakeholders** are the persons or groups that are directly or indirectly affected by a new or existing project/business as well as those that may have interests in it and/or the ability to influence its outcome, either positively or negatively. This can refer to employees, customers, shareholders, lenders, communities, suppliers, industry, governments and interested third parties.
- **Serious Incident** is one of the following which affects any employee, customer, supplier, or other person who has dealings with, or is affected by the activities of, Investee Company or which occur on or nearby any site, plant, equipment or facility of any Investee Company:
 - a. an incident resulting in death or permanent injury to any person.
 - b. any other incident which has a material negative impact on the environment or the health, safety and security situation (including without limitation any explosion, spill or workplace accident which results in death, serious or multiple injuries or material environmental contamination).
 - c. any incident of a social nature (including without limitation any violent labour unrest or dispute with local communities, accident/incident to local person due to company related activity), which has or is reasonably likely to have a material negative effect on the social and cultural context.

- d. "Safeguarding Violation" means any action or series of actions, undertaken by Investee Companies or any of their Affiliates, contractors or subcontractors, or its or their employees or agents that: (a) involves any work or service which is exacted from any person under the menace of any penalty and for which that person has not offered themselves voluntarily, or that otherwise contravenes the requirements of the ILO Conventions ; (b) contravenes the requirements of the Gender-Based Violence Convention ; or that otherwise involves the exploitation, abuse or harassment (being any form of unwanted verbal, non-verbal or physical conduct, whether by force or under unequal or coercive conditions) of any person that is directed at such person because of their perceived or real sex or gender, or that disproportionately affects people of a particular sex or gender; or (c) involves the exploitation or abuse of a child.
- e. any Forced Labour Indicator.

4. RESPONSIBILITIES

- BD team facilitates completion of preliminary screening checklist ([APPENDIX B](#) and [APPENDIX B.1](#)) for Behind the meter (BTM) projects.
- For BTM projects proposed in hazardous industries a high-level safety screening is done by an internal/external safety expert ([APPENDIX B.1](#)).
- PD team facilitates completion of preliminary screening checklist ([APPENDIX B](#)) for greenfield (OA, GC) projects.
- ESG team facilitates completion of preliminary screening checklist ([APPENDIX B](#)) for acquisition projects.
- Assessment of filled preliminary checklist and preliminary project categorization is done by EHS/ESG team.
- ESIA's, ESGDDs, High-Level Safety Risk Screening are performed by reputed external agencies.
- Final project categorization and risk rating is determined by the external agency performing ESIA's and ESGDDs.
- Final project categorization and risk rating is verified and approved by ESG team.

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5. PROCEDURE FOR ESG RISK SCREENING AND CATEGORIZATION

5.1. Project Categorization

ESG Categorization reflects the magnitude of environmental, health & safety and social risks and impacts. The following figure illustrates the environmental and social risk and impact-based descriptions to be used for project/deal categorisation as A, B, C.

Category A	Category B	Category C
<ul style="list-style-type: none"> Project likely to have significant adverse ESG impacts that are irreversible, cumulative, diverse or unprecedented. Impacts may affect an area larger than the sites or facilities subject to physical works and may be temporary or permanent in nature Considered High-risk investments. 	<ul style="list-style-type: none"> Project having limited number of potentially adverse ESG impacts. Impacts are not unprecedented; few if any of them are irreversible or cumulative. Impacts are limited to the Project area and can be successfully managed using good practice in an operational setting. These are considered medium risk investments. 	<ul style="list-style-type: none"> Projects having minimal or no adverse ESG impacts; Considered as low risk investments.

Figure 1: Project Risk Categories

5.2. ESG Risk Management Strategy

5.2.1. Principal Risk Management strategy:

All solar and wind projects typically have a lifecycle of 25 years and follows a cycle of conceptualization, planning, construction and commissioning, operation and maintenance to final decommissioning/upgradation. Both solar and wind power projects, though renewable and clean energy, have Environmental and Social (E &S) risks that are required to be managed through the various stages of project lifecycle. These risks however may vary based on the nature of the project, scale of the project, geographical location, model of the project (greenfield or acquisition) etc. and are considered on a project-to-project basis. Typical E&S concerns in a greenfield Solar and Wind Power Projects and respective Radiance management strategy is presented in tables below.

S. No.	Impact/issue	Project phase	Management Strategy
1.	Land related issues during land purchase/leasing	Planning and Construction	<ul style="list-style-type: none"> Radiance generally purchases or leases land on a willing seller/lessor – buyer/lessee basis. Radiance believes in transparent voluntary land procurement process; based on good faith negotiations and willing buyer willing seller agreements or lessor/lessee agreements.

S. No.	Impact/issue	Project phase	Management Strategy
2.	Loss of land-based livelihood including agriculture/grazing and economic impact	Planning and Construction	<ul style="list-style-type: none"> Radiance believes that in the process of land procurement there should be no adverse social/livelihood/economic impact on the land sellers and to the community at large.
3.	Displacement of settlements	Planning and Construction	<ul style="list-style-type: none"> Radiance avoids land which might trigger displacement. In case it is willing seller, it only proceeds after necessary checks on the process.
4.	Effect on cultural or sites of archaeological importance.	Planning and Construction	<ul style="list-style-type: none"> Radiance screens out any such sites which is of cultural or archaeological importance. In case of presence of any religious structure on site, proper access is ensured to villagers/community for their religious practices.
5.	Loss of vegetation from clearing of site will possibly accentuate soil erosion;	Construction	<ul style="list-style-type: none"> All site preparation activities limited to the project site only and areas demarcated for storage of construction material, parking of vehicles, topsoil storage etc. Where possible bunding is done to prevent soil erosion. The land is restored back to the original state and vegetated to the extent possible avoiding shading and impediment to operations after completion of construction.
6.	Disturbance to natural drainage pattern of the area resulting in water logging in neighboring plots	Planning, Construction and Operation	<ul style="list-style-type: none"> Topography and drainage within the site is pre-identified and it is ensured that there is no disturbance to existing drainage pattern. Appropriate number of cross drainage channels are provided during construction to maintain flow in existing natural channels. All drainages are kept free of debris during operations.
7.	Right of Way (RoW) requirements for access road, transmission line, water supply etc. creating potential disruption of community access routes.	Construction and operations	<ul style="list-style-type: none"> Relevant permissions for RoW are obtained. Access routes are provided to villagers/community as the case may be.
8.	Issue of local labour employment	Construction and Operation	<ul style="list-style-type: none"> To the extent possible local labour and security is employed.
9.	Influx of migrant population, labour camp and related facilities	Construction	<ul style="list-style-type: none"> The projects are generally completed maximum within a six months' time frame and very large influx of migrant labour is not anticipated with the scale of the projects. In case of labor accommodation, guidelines are given to contractor for the accommodation.

S. No.	Impact/issue	Project phase	Management Strategy
10.	Work site facilities and HR and labour related compliances	Construction and operation	<ul style="list-style-type: none"> Guidelines are issued to contractor for providing drinking, sanitation and resting facility. The same is monitored by Radiance.
11.	Traffic Movement and Pedestrian Safety	Construction and operation	<ul style="list-style-type: none"> Routes identified to avoid crowded areas. Instructions are given to drivers for safe driving. Traffic stewards placed at relevant points as required.
12.	Onsite Health and Safety management of workforce	Construction and Operation	<ul style="list-style-type: none"> Contractors are required to follow Radiance policy, guidelines and SOPs for safe operations and impart continues training to workers. On-site H&S is monitored by OE and Radiance EHS personnel.
13.	Water availability- Diversion of water from community resources such as ground water wells, neighboring surface water bodies	Construction and Operation	<ul style="list-style-type: none"> Water availability is pre-identified with a status of the water availability in the project area/Taluk/District. Diversion of water from community access sources are avoided and procured through tankers. Relevant permissions are obtained in case of bore well or as applicable for surface water resources. Robotic cleaning or other options may also be explored depending on feasibility.
14.	Wastewater and waste disposal;	Construction and Operation	<ul style="list-style-type: none"> All toilets are attached to septic tanks followed by soak pits. Waste is disposed off through relevant vendors and /or collection agencies.
15.	Fire risk due to spread of fire from neighboring plots burning crop residue or due to project related activity	Construction and Operation	<ul style="list-style-type: none"> Nearest fire station and available water tankers contacts are pre-identified and relevant numbers available for emergency. Fire extinguishers kept in operational condition. Dry Vegetation is trimmed and monitored for any such risk. No smoking allowed on site.
16.	Absence of Grievance redressal mechanism which can contribute to community resentment or agitation	Operation	<ul style="list-style-type: none"> Radiance generally ensures engagement with community to avoid any such situations. A grievance redressal committee is created to handle any community concerns.
17.	Hazardous waste management (recycling and disposal)	Construction, Operations and Decommissioning	<ul style="list-style-type: none"> Use authorized agencies to dispose of hazardous waste.

Table 1: E&S concerns in a greenfield Solar Power Projects and Radiance Management Strategy


S. No.	Impact/issue	Project phase	Management Strategy
1.	Land related issues during land purchase/leasing	Planning and Construction	<ul style="list-style-type: none"> Radiance generally purchases or leases land on a willing seller/lessor – buyer/lessee basis. Radiance believes in transparent voluntary land procurement process; based on good faith negotiations and willing buyer willing seller agreements or lessor/lessee agreements.
2.	Loss of land-based livelihood including agriculture/grazing and economic impact;	Planning and Construction	<ul style="list-style-type: none"> Radiance believes that in the process of land procurement there should be no adverse social/livelihood/economic impact on the land sellers and to the community at large.
3.	Displacement of settlements;	Planning and Construction	<ul style="list-style-type: none"> Radiance avoids land which might trigger displacement. In case it is willing seller, it only proceeds after necessary checks on the process.
4.	Effect on cultural or sites of archaeological importance.	Planning and Construction	<ul style="list-style-type: none"> Radiance screens out any such sites which is of cultural or archaeological importance. In case of presence of any religious structure on site, proper access is ensured to villagers/community for their religious practices.
5.	Influx of migrant population specially during construction phase, labour camp and related facilities;	Planning and Construction	<ul style="list-style-type: none"> The projects are generally completed maximum within a six months' time frame and very large influx of migrant labour is not anticipated in wind projects. In case of labor accommodation, guidelines are given to contractor for the accommodation.
6.	Increased noise levels in the area both during the construction and whole operation phase of the project;	Mobilization and Construction/ Operations	<ul style="list-style-type: none"> Where near settlements, appropriate modelling exercise will be carried out and appropriate measures will be adopted especially for the operation phase.
7.	Interference with ecological corridors and faunal migration routes mainly through ecological disturbance leading to displacement or exclusion of birds and collisions of birds with wind turbines;	Mobilization and Construction/ Operations	<ul style="list-style-type: none"> Pre-identification of such corridors and routes. If identified, additional studies to be carried out to and appropriate measures to be adopted.
8.	Topographical change;	Construction	<ul style="list-style-type: none"> Avoided to the extent possible and slopes restored with vegetation other slope stabilization options.
9.	Loss of vegetation from clearing will possibly accentuate soil erosion;	Construction	<ul style="list-style-type: none"> All site preparation activities limited to the project site only and areas demarcated for storage of construction material, parking of vehicles, topsoil storage etc. Where possible bunding is done to prevent soil erosion.

S. No.	Impact/issue	Project phase	Management Strategy
			<ul style="list-style-type: none"> The land is restored back to the original state and vegetated to the extent possible avoiding impediment to operations after completion of construction.
10.	Work site facilities and HR and labour related compliances	Construction and operation	<ul style="list-style-type: none"> Guidelines are issued to contractor for providing drinking, sanitation, and resting facility. The same is monitored by Radiance.
11.	Traffic Movement and Pedestrian Safety	Construction and operation	<ul style="list-style-type: none"> Routes identified to avoid crowded areas. Instructions are given to drivers for safe driving. Traffic stewards placed at relevant points as required.
12.	Onsite Health and Safety management of workforce	Construction and Operation	<ul style="list-style-type: none"> Contractors are required to follow Radiance policy, guidelines and SOPs for safe operations and impart continues training to workers. On-site H&S is monitored by OE and Radiance EHS personnel.
13.	Community health impacts in the operation phase because of the shadow flicker and blade throw;	Operations	<ul style="list-style-type: none"> Appropriate modelling studies will be undertaken to understand any such issues and mitigation measures adopted.
14.	The presence of wind turbines may indirectly affect local fauna and bird populations by decreasing the area of habitat available to breeding, feeding, nesting, resting etc.	Operations	<ul style="list-style-type: none"> Appropriate studies will be triggered as relevant through specialists and mitigation measures suggested would be adopted.
15.	Absence of Grievance redressal mechanism which can contribute to community resentment or agitation	Operation	<ul style="list-style-type: none"> Radiance generally ensures engagement with community to avoid any such situations. A grievance redressal committee is created to handle any community concerns.

Table 2: E&S concerns in a Wind Power Project and Radiance Management Strategy

The process of risk management at Radiance integrates a comprehensive risk assessment procedure into Radiance's investment process with an objective to identify, assess, mitigate and monitor ESG risks and impacts across the project lifecycle. It starts with every deal/project undergoing a preliminary E&G screening to assign risk categorization as per IFC standards (**Figure 1**) to greenfield projects and acquisition projects subsequently undergoing environment and social impact assessment and environmental due diligence respectively as a part of vetting process. Final categorization of prospective deals/projects is defined based on the outcome of the ESIA or ESGDD.

Radiance has integrated the following processes into its investment process to meet the ESG policy commitments:

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- Screening of ESG issues in potential deals and projects.
- Classifying the potential deals and projects based on the nature of projects into high, medium and low risk and categorizing them into Category A, Category B or Category C (**Figure 1**) respectively.
- Conducting ESGDD/ESIA of deals and projects to understand the ESG risks, impacts and level of compliance with Radiance 's Policy and investment standard.
- Based on outcome of the ESGDD/ESIA, developing an ESGAP/ESMP with a timeline and responsibility allocation for action items.
- Regular monitoring and review ESGAP/ESMP implementation status.

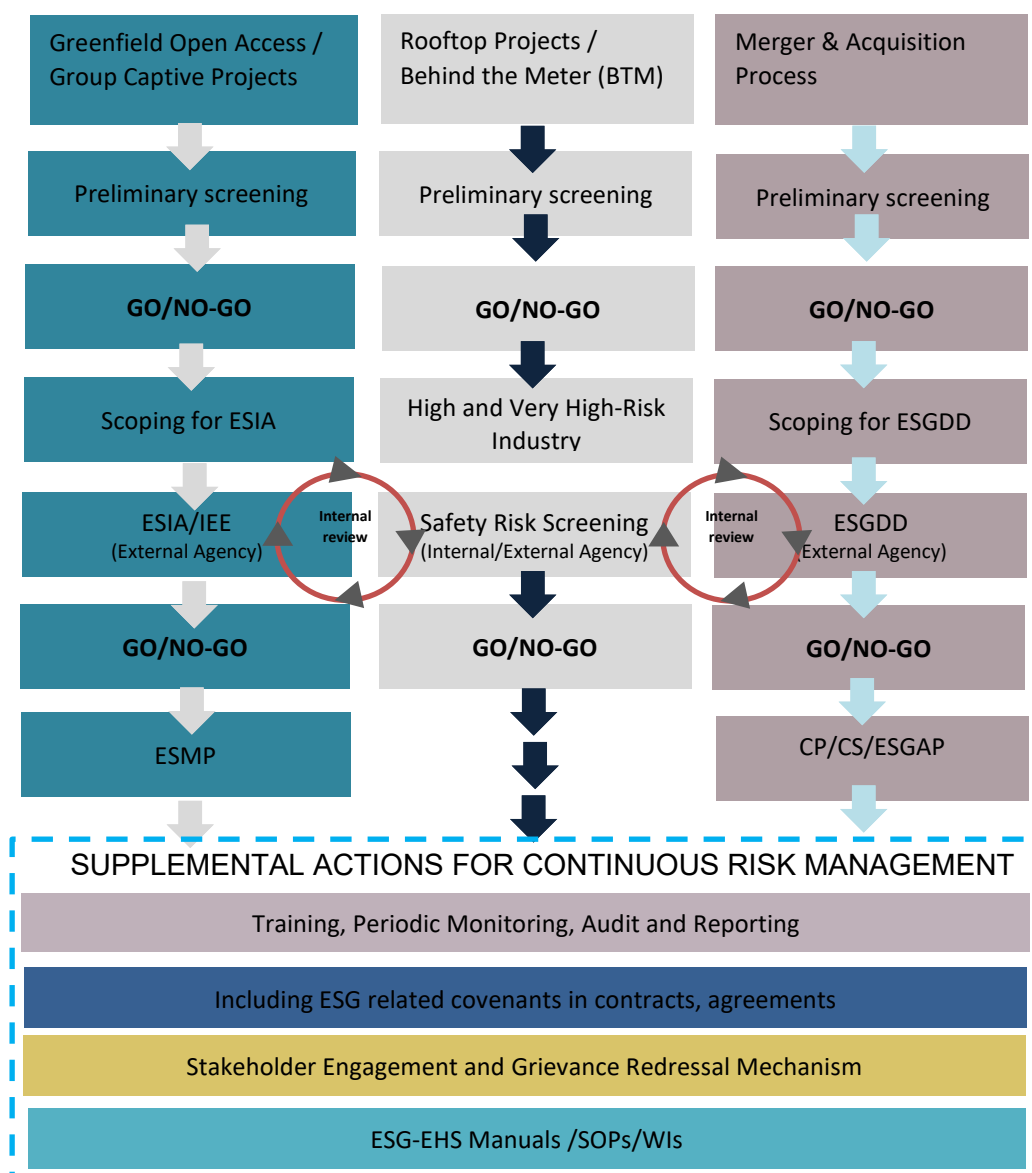



Figure 2: ESG Risk Management Process Flow

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5.2.2. Continuous Risk Monitoring and Management:

Radiance periodically monitors efficacy of implementation of ESGAP/ESMP and performance of its assets against industrial benchmark on health and safety. Internal and External Audits are performed to evaluate gaps in implementation.

Radiance has mapped ESG related covenants in all its contracts, agreements with third part contractors to categorically convey Radiance's ESG expectations and to ensure that the third-party contractors contractually bound to endorse Radiance's ESG commitments. Standard and controlled ESG manuals, SOPs help Radiance maintain consistency in the activities performed within the ambit of ESG framework, across the strata and levels. It also helps in uniformly delegating instructions across strata.

For sustained monitoring and management of ESG risks and impacts and to ensure continual improvement of ESG management system, Radiance has integrated stakeholder engagement as an inclusive and continuous process. Radiance considers stakeholder engagement as the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. At Radiance stakeholder engagement is an ongoing process which involves, in varying degrees, the following elements: stakeholder identification, disclosure and dissemination of information, consultation and participation, GRM and ongoing reporting to affected Communities. Radiance engages with its stakeholders in a manner that is proportionate to the risks and impacts of its operations. Radiance values relationship with its internal and external stakeholders and ensures that as part of its operations, the interaction with key stakeholders is protocol driven and addresses evolving needs and challenges. Radiance encourages its stakeholders to report their suggestions and grievances, through a well-established GRM.

Radiance is also committed to safeguard the environment, promote resource efficiency and healthy and safe work environment. Radiance adopts a Zero Accident Policy, and it is committed to promote a safe work culture to prevent injury and ill health arising from its operations. Radiance has adopted a comprehensive and integrated Environment, Health, and Safety Management System (EHSMS) which assists Radiance strategize and streamline its operations with its EHS Policy objectives.

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6. PRINCIPAL RISK MANAGEMENT STRATEGY- ESG RISK SCREENING AND CATEGORIZATION

6.1. ROA and GC Projects

A step wise illustration of investment process followed at Radiance for the greenfield site development (of OA and GC models), projects is presented through the flow charts below. Yellow boxes highlight ESG screening steps integrated into the overall investment process.

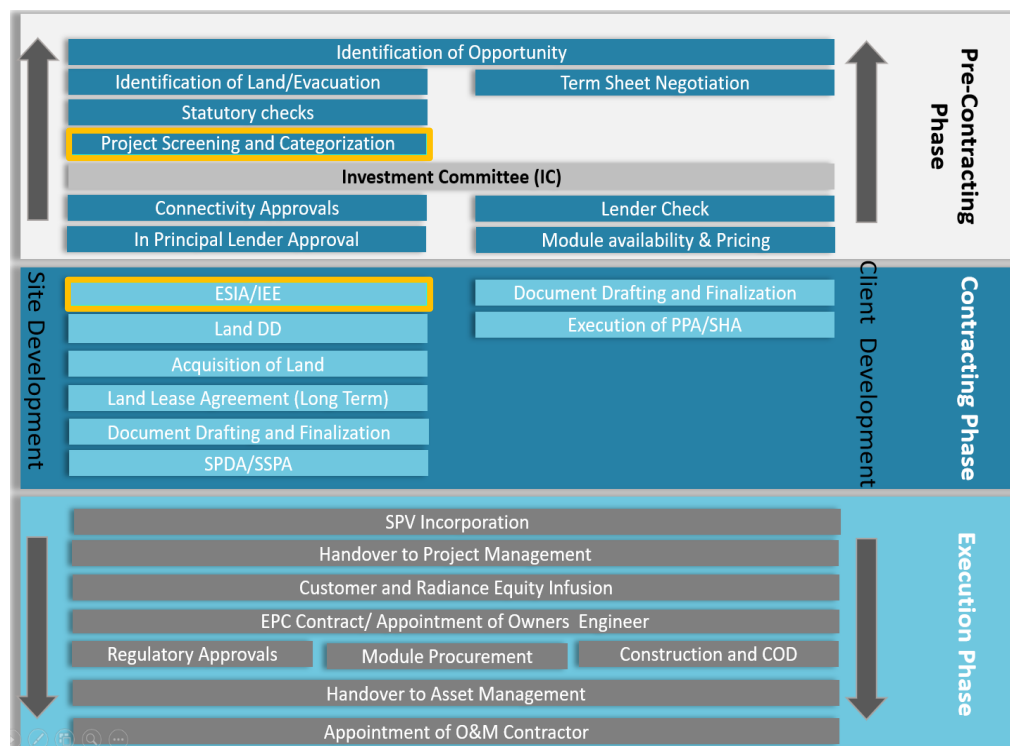



Figure 3: ESG integration in Investment Process- OA and GC Projects/Assets

6.1.1. Screening for Excluded Activity

An Exclusion List encompasses the types of projects in which Radiance does not invest, either directly or indirectly. Any potential greenfield opportunity is screened against the Exclusion List ([APPENDIX A](#)) to ensure that the opportunity does not involve any activity which triggers exclusion.

6.1.2. Preliminary ESG Risk Screening and Categorization

A high-level screening is conducted in the pre-contracting phase in terms of sector, siting of greenfield land parcel, EFR of the target site. Based on the same, the opportunity is categorized as Category A, B or C ([Figure 1](#)). The ESG risk evaluation checklist for preliminary categorization is provided in This screening process permits the provisional categorization of proposed projects into high, medium and lower risk (Category A, B or C respectively) projects. The

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findings and preliminary risk categorization at this stage informs the decision for Go/No-Go and also scope of the ESIA to be undertaken.

PD team facilitates completion of preliminary screening checklist [APPENDIX B](#) for greenfield (OA, GC) projects. Assessment of filled preliminary checklist and preliminary project categorization is done by EHS/ESG team.

6.1.3. Final Risk-Impact Assessment and Categorization

In the contracting phase after the IC meeting, a comprehensive environment and social impact assessment is carried out for all the greenfield Sites by hiring a reputed external consultant. The Scope of ESIA is based on a pre-approved Terms of References (ToR). The findings of the ESIA and recommendations are incorporated in the investment memo presented to the Investment Committee. Terms of References (ToR) for hiring an external consultant (also referred as third-party consultant) for conducting ESIA along with a typical report structure is presented in [APPENDIX C](#).

The reference standards for conducting the Rapid ESIA are as below:

- Applicable local, national and international environmental and social (including occupational health and safety) legislations.
- IFC Performance Standards, 2012.
- IFC/World Bank EHS General and relevant Sector Specific Guidelines as applicable.
- ESM Policy Framework of National Investment and Infrastructure Fund ("NIIF").
- ESG Framework of the Department of International Development (DFID).


Final project categorization and risk rating is determined by the external agency performing ESIAs. Final project categorization and risk rating is verified and approved by ESG team.

6.1.4. ESMP Execution and Monitoring

A strategy for managing risks and mitigating impacts called as an ESMP is prepared. This EHS and Social Management Plan (ESMP) ([APPENDIX D](#)) is an implementation guiding tool for the EHS and social impacts management. ESMP consists of the set of mitigation and management measures to be taken during implementation of the project to avoid, reduce, mitigate, or compensate for adverse social and environmental impacts, in the order of priority, and their timelines.

Respective SPVs are instructed by the ESG team to execute the ESMP and report compliance to Radiance once during construction or on a quarterly basis during operations.

A consolidated Risk Heat Map is also prepared ([APPENDIX D](#)) to cumulatively highlight red flags from all the ESIA reports and to give heightened visibility of any pressing finding/issue to the ESG team.

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6.2. BTM (Rooftop/Ground Mount)

A step wise illustration of investment process followed at Radiance for the BTM (Rooftop/Ground mount) projects is presented through the flow charts below. Yellow boxes highlight ESG screening steps integrated into the overall investment process.

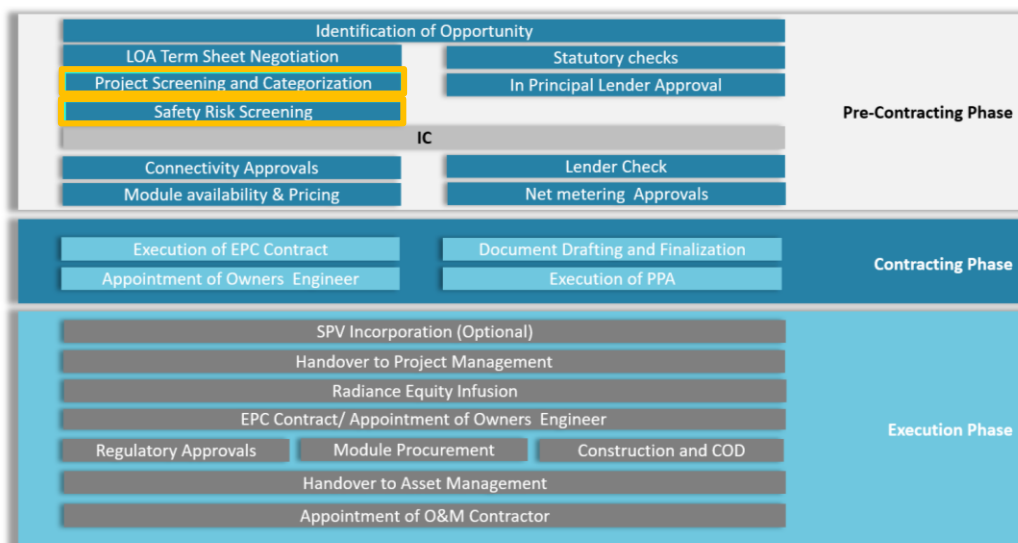


Figure 4: ESG integration in Investment Process- BTM (Rooftop/Ground mount) Projects

6.2.1. Screening for Excluded Activity

Any potential BTM (Rooftop/Ground mount) opportunity is screened against the Exclusion List ([APPENDIX A](#)) to ensure that the opportunity does not involve any activity which triggers exclusion.


6.2.2. Preliminary ESG Risk Screening and Categorization

A high-level screening is conducted in the pre-contracting phase in terms of sector, siting project, EFR of the target site. Based on the same, the opportunity is categorized as Category A, B or C ([Figure 1](#)). The ESG risk evaluation checklist for preliminary categorization is provided in [APPENDIX B](#).

This screening process permits the provisional categorization of proposed projects into high, medium and lower risk (Category A, B or C respectively) projects. The findings and preliminary risk categorization at this stage informs the decision for Go/No-Go and scope for high-level safety screening is done by an external safety expert.

BD team facilitates completion of preliminary screening checklist ([APPENDIX B](#) and if required [APPENDIX B.1](#))

for Behind the meter (BTM) projects. Assessment of filled preliminary checklist and preliminary project categorization is done by EHS/ESG team. In case the industry involves a hazardous process ([APPENDIX F](#)) or operates under hazardous conditions, a high-level safety screening is recommended.

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6.2.3. High-Level Safety Screening

A high-level safety screening is required for industries that involve a hazardous process or operates under hazardous conditions. If during the screening the facility is found to have lax safety management and poor safety standards and compliance, the safety screening would return a 'HIGH RISK' rating.

Preliminary screening checklist [APPENDIX B.1](#) is used to establish the final risk rating. Risk rating matrix below ([Figure 5](#)) is used for final project categorization and risk rating. GO/NO-GO is decided based on the outcome of this screening and on the standard of safety/risk management practices implemented in the facility. Preliminary screening checklist [APPENDIX B.1](#) is filled by the target client as a self-declaration. The self-declaration is then vetted/assessed by our internal safety expert for reliability and completeness of the disclosure. In case the internal safety expert deems disclosure incomplete or incredible, then additional information is sought from the BD partner involved with the deal and in some cases the matter is escalated to the internal Risk Management Advisory Committee for value judgement.

Decision to do an independent third-party evaluation of client's premises is taken by an internal Risk Management Advisory Committee based on the outcome of initial report submitted by the internal safety expert. Risk Management Advisory Committee may also decide to appoint an internal expert for evaluation of Client's premises based on its opinion on the matter and circumstances surrounding the deal.

Radiance solicits client's full co-operation and support by informing the client in advance about its requirements to do an independent third-party evaluation. In a case where a client disallows access to its premises citing reasons (such as confidentiality, access restriction by its policy etc.), it is at the discretion of the Risk Management Advisory Committee to take the final Go/No-Go decision.


Terms of References (ToR) for hiring an external safety expert for conducting final risk screening is presented in [APPENDIX E](#).

Risk Rating Matrix

		Probability of Occurrence		
		Low	Medium	High
Potential Impact	Low			
	Medium			
	High			

Probability of Occurrence and Potential Impact are a subjective assessment based on experience

Figure 5: Risk Rating Matrix

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6.3. Acquisition Projects

A step-wise illustration of investment process followed at Radiance for the acquisition projects is presented through the flow charts below. Yellow boxes highlight ESG screening steps integrated into the overall investment process.

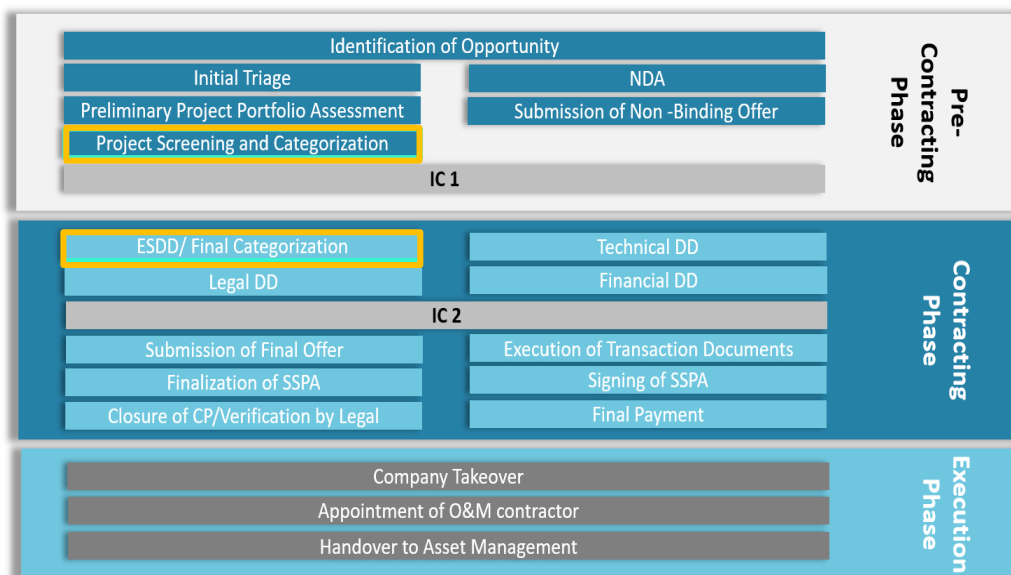


Figure 6 ESG integration in Investment Process- Acquisition Projects

6.3.1. Screening for Excluded Activity


Any potential greenfield opportunity is screened against the Exclusion List ([APPENDIX A](#)) to ensure that the opportunity does not involve any activity which triggers exclusion.

6.3.2. Preliminary ESG Risk Screening and Categorization

A high-level screening is conducted in the pre-contracting stage in terms of sector, region, EFR of the target company/ project etc. Based on the same, the opportunity is categorized as Category A, B or C ([Figure 1](#)). The ESG risk evaluation checklist for preliminary categorization is provided in [APPENDIX B](#). This screening process permits the provisional categorization of proposed projects into high, medium and lower risk (Category A, B or C respectively) projects. The findings and preliminary risk categorization at this stage informs the decision for Go/No Go and also scope of the ESGDD to be undertaken.

Radiance has identified select United Nations Sustainable Development Goals that align with the impact themes, as summarised in [APPENDIX G](#). During the screening process, the area of operations of the potential target company is broadly assessed for alignment to these identified SDGs.

ESG team facilitates completion of preliminary screening checklist [APPENDIX B](#) for acquisition projects.

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6.3.3. ESG Due Diligence and Final Categorization

In the contracting phase after the initial IC meeting, a full-fledged ESG due diligence assessment of the potential asset(s) (also referred as target asset (s)) is carried out by hiring a reputed external consultant. The Scope of ESGDD is based on a pre-approved Terms of References (ToR). The findings of the ESIA and recommendations are incorporated in the investment memo presented to the Investment Committee. Terms of References (ToR) for hiring an external consultant (also referred as third-party consultant) for conducting ESGDD along with a typical report structure is presented in [APPENDIX H](#).

The reference standards for conducting the ESGDD are as below:

- Applicable local, national and international environmental, labour, EHS and social legislations.
- IFC Performance Standards, 2012.
- IFC/World Bank EHS General and relevant Sector Specific Guidelines as applicable.
- ESM Policy Framework of National Investment and Infrastructure Fund (“NIIF”).
- ESG Framework of the Department of International Development (DFID).
- Relevant ILO conventions covering core labor standards and conditions of employment.

Final project categorization and risk rating is determined by the external agency performing ESIA. Final project categorization and risk rating is verified and approved by ESG team.


6.3.4. ESGAP Execution and Monitoring

Based on the findings of the ESGDD, an ESGAP is prepared that includes specific corrective actions and improvements that are required to

- Address non-conformances and red flag issues that are identified during the ESGDD;
- Ensure compliance with the Radiance’s ESG policy, applicable requirements and investment standards; and
- Improve ESG performance/ work on opportunities.

The ESGAP is finalized based on discussions with the deal team, ESG lead, the target asset and third-party consultant, where relevant. The discussions focus on clarification on action points; agreement on timelines, responsibilities and financial budget for successful corrective actions of the red flag issues that have been identified during the ESGDD. The ESGAP specifies timelines for implementation and allocation of responsibility to control the risks/ issues and opportunities identified.

Final project categorization and risk rating is determined by the external agency performing ESGDD. Final project categorization and risk rating is verified and approved by ESG team.

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7. CONTINUOUS RISK MONITORING AND MANAGEMENT

7.1. Stakeholder Engagement and Grievance Redressal Mechanism

7.1.1. Stakeholder Engagement

Radiance considers stakeholder engagement as the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project's environmental and social impacts. At Radiance stakeholder engagement is an ongoing process which involves, in varying degrees, the following elements: stakeholder identification, disclosure and dissemination of information, consultation and participation, GRM and ongoing reporting to affected Communities. Radiance engages with its stakeholders in a manner that is proportionate to the risks and impacts of its operations. Radiance values relationship with its internal and external stakeholders and ensures that as part of its operations, the interaction with key stakeholders is protocol driven and addresses evolving needs and challenges. Radiance encourages its stakeholders to report their suggestions and grievances, through a well-established GRM. Stakeholders are identified for greenfield projects during the ESIA.

Stakeholder Identification, Classification and Consultation:

A stakeholder is defined as “any identifiable group or individual who can affect the achievement of an organization's objectives or who is affected by the achievement of an organization's objectives”. Stakeholders thus vary in terms of degree of interest, influence and control they have over the project.


For a typical greenfield project all the stakeholders are primarily categorized into two categories, identified as:

- **Primary Stakeholders:** include people, groups, institutions (both Government and private) that either have a direct influence on the Project or are directly impacted (positively or adversely) by the Project and its activities; and
- **Secondary stakeholders:** are those that have a bearing on the Project and its activities by the virtue of their being closely linked or associated with the primary stakeholders and due to the influence, they have on the primary stakeholder groups.

During the ESIA process, stakeholder identification and prioritization is conducted for identifying the key stakeholders of the project, while keeping in mind the nature of the project and its setting. Subsequently, consultations are conducted with these identified stakeholders through a participatory approach. The table below (**Table 3:**) presents key stakeholders' classification of a typical greenfield project.

Stakeholder Groups	Primary Stakeholders	Secondary Stakeholders
Community	<ul style="list-style-type: none"> ▪ Land lessor ▪ Developers and Contractors ▪ Local Laborers 	<ul style="list-style-type: none"> ▪ Local Community ▪ Vulnerable groups ▪
Institutional Stakeholders	<ul style="list-style-type: none"> ▪ Gram Panchayat 	<ul style="list-style-type: none"> ▪ Civil Society/ Local NGOs
Government Bodies	<ul style="list-style-type: none"> ▪ Regulatory Authorities ▪ District Administration 	
Others	<ul style="list-style-type: none"> ▪ Migrant workforce 	

Table 3: Stakeholder Group Classification

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Stakeholder Engagement Plan (SEP):

Based on stakeholder identification and classification; and outcome of stakeholder consultation; assessment of expectations, opinions, key concerns of stakeholders, a SEP is prepared to guide stakeholder consultations across various stages of the project, while meeting the requirements of the applicable reference framework for the Project. Overall, the SEP enables stakeholder engagement to be undertaken in a systematic and meaningful manner, where the various stakeholder groups are able to express their individual views, opinions, and concerns, while allowing the Project to appropriately respond to them.

The objective of the Stakeholder Engagement Plan are as follows:

- Identification of the stakeholder groups in the project location and analysis of their profiles, interests, issues/impacts and concerns relevant to the project.
- Looking at women needs and challenges separately. Getting women's perspective on project and its impact on women.
- Identification of specific measures to allow meaningful engagement with different stakeholder groups identified in a manner that is transparent and accessible and using culturally appropriate communication methods with a specific focus on the stakeholders with high influence/impact.
- Facilitate adequate and timely dissemination of information to the stakeholder groups in a culturally appropriate manner.
- Provide systems for prior disclosure/dissemination of information and consultation including seeking inputs from affected persons, incorporation of inputs, as applicable, providing feedback to affected persons/groups on whether and how the input has been incorporated; and
- Providing a mechanism for documentation of the activities undertaken and the reporting and monitoring of the same.

The process of stakeholder engagement is undertaken in keeping with the principles listed below (**Figure 7**)

Transparency and Fairness	Congruence and Materiality	Cultural Appropriateness and Inclusivity	Consultative and Collaborative	Documenting and Disclosing
<ul style="list-style-type: none"> •The process of engagement shall be transparent, in harmony with the local culture and in the appropriate language. •This would enable trust to be build amongst the stakeholders towards the project by allowing for a clearer understanding to be developed of the reasoning and motivation behind the activities and thus of the fairness of the process. 	<ul style="list-style-type: none"> •The engagement activities undertaken should be aligned to the business objectives, priorities and the identified issues/ impacts/ risks associated with the project. •As part of the planning, the engagement activities should be prioritized on the basis of their significance to immediate and long-term interests of the business and/or the stakeholders. •The materiality of an issue may be determined based on criteria such as financial implications, sustainability drivers, temporal nature of issues (short, medium or long term) and their impact on stakeholders and JKPM 	<ul style="list-style-type: none"> •The engagement activities undertaken should be in cognizance of the cultural norms and practices of the stakeholder groups as well as the differences in social position of the various groups. •To the extent possible, the engagement activities should be carried out within the existing institutions and processes of the stakeholders identified, while ensuring participation by all groups, especially the vulnerable groups such as women and economically weaker population. • Furthermore, aspects such as individual sub-group cultures, access to knowledge and information across various sub-groups, language and socio-economic status of the stakeholder groups must be kept in mind while undertaking engagement activities. 	<ul style="list-style-type: none"> •Stakeholder engagement is a two-way process of communication between the project and the stakeholders. •A collaborative engagement process allows for the ideal engagement activities to be identified according to the individual group requirements, while balancing the competing needs and interests of all stakeholders. •Such an engagement process also enables for trust to be build amongst the stakeholder groups and assists towards ensuring sustainability of project activities and a 'social license to operate'. •Collaboration is viewed as one of the critical differences between information disclosure and engagement with stakeholders 	<ul style="list-style-type: none"> •The stakeholder engagement process evolves through the lifecycle of the project, which is informed by the experiences and learnings from engagement activities undertaken in previous stages. •It is critical that all engagement activities with the stakeholders are documented and recorded, along with photographic evidence wherever possible. •Also, as part of the engagement activities the project should disclose the summary of these activities and the key outcomes of the same on a regular basis to the external stakeholders identified, along with the key project information.


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Figure 7 Principles of Stakeholder Engagement

A standard stakeholder engagement plan is prepared by Radiance for one of its sites is presented in **APPENDIX I**.

7.1.2. Grievance Redressal Mechanism (GRM)

GRM is an integral part of stakeholder engagement process. We understand that implementation of a project may have implications on both the environment as well as the people around the project site. People may have apprehension about the impact of the project during the construction and operational phase. Though a robust stakeholder engagement process Radiance establishes a strong relationship with its stakeholders to manage the impact of its business activities on affected communities.

GRM allows stakeholders to reach out to Radiance and raise their questions or concerns in a fair environment, free from fear and prejudice while helping Radiance in impartial and prompt redressal/ disposal of such grievances. Radiance addresses all complaints, grievances, disagreements received, regardless of whether they stem from real or perceived issues. Any stakeholder who considers himself/ herself affected by activities of projects owned and operated by Radiance has access to this procedure (**APPENDIX J**).


The statutory rights of the complainant to undertake legal proceedings remain unaffected by participation in this process. In addition, GRM is kept transparent, easily accessible, considerate of gender, social and cultural diversity and capable of encompassing the risks associated with all stages of the project that may have an impact on the people and surrounding environment. Radiance's transparent GRM process fosters trust in the process and its outcomes. To this end, Radiance communicates its GRM procedure in an understandable manner to all concerned stakeholder groups. Confidentiality is respected, and Radiance takes all reasonable steps to protect the interest of concerned parties.

One can register a grievance/feedback/concern by filling the contact form on Radiance Website <https://www.radiancerenewables.com/contact/> by selecting 'Issues or Feedback' from dropdown under 'Subject'. Radiance, at the corporate level also maintains a feedback/concern mail id complaints@radiancerenewables.com on its website for registering any grievances by external stakeholders. A complaint/suggestion box (under lock and key) is maintained at all manned sites for workers and visitors. Detailed GRM is annexed in **APPENDIX J** for reference.

7.2. Training and Capacity Building

Radiance understands the need for training and capacity building of the employees, especially those dealing with generating newer opportunities and identifying new deals to ensure effective implementation of ESG Framework. Therefore, adequate funds and resources are committed and allocated to train employees on the ESG policy statement and procedures. Radiance assesses and tracks the progress and development of employees and skills regarding ESMS understanding and performance.

Radiance recognizes that training and capacity building of team members is essential to ensure effective integration of ESGMS in the investment process of Radiance. ESG lead and EHS lead periodically conducts training sessions with concerned Radiance employees for effective implementation and application of ESG Framework.

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A training matrix and calendar ([APPENDIX K](#)) is prepared at the beginning of the financial year and the same rolled out over 12 months and reviewed and updated annually by the internal ESG Team. Training records are maintained in a training record form ([APPENDIX K.1](#)). ESG-related training for employees is provided on a regular basis and is integrated in the on-boarding training program when an employee joins the Fund. ESG-related training sessions primarily focuses on:

- Providing a background of the drivers for ESG integration, international good practices, investors and other stakeholders' expectations, stakeholders' perceptions, etc.
- Communicating the ESG Policy; investment process imperatives; its implementation imperatives; its monitoring & reporting imperatives and the proposed supporting tools and materials.
- Provide a background on ESG compliances basis sub sectors, as well as investor requirements.
- Allowing for questions and answers to promote engagement and internal stakeholders' buy-in; and
- Providing support for Radiance employees to pass on Radiance's ESG requirements and expectations to Radiance's contractors, sub-contractors and third parties.

In addition, Radiance has subscribed to several online training platforms that gives its employees freedom to fulfil their training needs by choosing from a plethora of skill-based on-line training modules.

7.3. Monitoring and Audit

Radiance monitors various Environmental, Social parameters and investment impacts monthly. Radiance reports its E&S Performance to GGEF monthly once and a ESG Performance Report is also submitted to the fund on an annual basis based on standardized reporting formats and frequencies. Key ESG performance reports shared with the Fund is listed in the table below:

SR No.	ESG Performance Reports	Frequency
1	ESG & Impact Plan for the year ahead	Annually once at the beginning of the financial year
2	Quarterly reports- <i>including but not limited to the following</i> <ul style="list-style-type: none"> • <i>ESG & HS Compliance</i> • <i>EHS Statistics (including reportable incidents and accidents)</i> • <i>Progress against the relevant SDGs</i> • <i>Impact related info</i> • <i>CSR activities</i> • <i>Employee/ community grievances and complaints</i> • <i>Certifications/Awards/ recognition</i> 	At the end of each quarter
3	Monthly reports: 1. High level ESG & Impact data	Every month


	2. Investment pipeline data	
5	Annual Report for the previous financial year	Annually once at the beginning of the financial year
6	Reporting of Incidents & Accidents	Serious Incident (APPENDIX L): <ul style="list-style-type: none"> • Notification within 48 hours • A detailed report to be submitted within 14 days of occurrence of Serious Incident. Other Incidents (Reportable Incident, Unsafe Act, Unsafe Condition, Near Miss etc.)- as part of Quarterly Report

Table 4: Key Performance Reports

In addition, respective greenfield sites report progress on ESMP implementation monthly once. Radiance understands that internal auditing helps in identifying errors and redundancies in operational and control procedures and lapses in implementation of ESMP. With an independent and unbiased view, internal auditors provide recommendations to improve the process to boost the efficiency and effectiveness of ESGMS. Internal audits at Radiance are conducted at a defined frequency shown below:

SR No.	Internal Audit-Topics	Frequency
1	ESMP Monitoring	Construction Sites: Once during HOTO Operational Sites: Annually Once
3	EHS internal audits	As per EHS Manual

Table 5: Internal Audit Frequency

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8. ESGMS REVIEW AND CONTINUOUS IMPROVEMENT

The ESGMS is reviewed periodically to ensure that it remains relevant and effective over time and incorporates improvements as relevant. The review involves the following:

- Identifying potential difficulties with operational aspects of ESGMS.
- Implementation and making necessary changes.
- Reviewing the scope of procedures of the framework to ensure that emerging ESG risks are detected and identified during the due diligence process; and
- Updating framework to reflect revisions in Fund's requirements, applicable national laws on environment, health, and safety, labour practices, etc. and the international reference frameworks used.

The revision is carried by ESG Lead, reviewed by the Operation Head, and approved by the Executive Director & CEO. Final approval is given by the Board of Radiance. The updates will be communicated to all team members through relevant communication channels.

APPENDIX A

EXCLUSION LIST

Exclusion List enlists types of projects in which Radiance does not invest, either directly or indirectly¹:

- 1) Production of or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements subject to international phase outs or bans, such as:
 - Polychlorinated biphenyls(i), pharmaceuticals(ii), pesticides, herbicides and wastes² ;
 - Ozone depleting substances³;
 - Wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora⁴;
 - Unsustainable fishing methods⁵;
 - Transboundary trade in waste or waste products⁶;
- 2) Production of or trade in arms (i.e., weapons, ammunitions or nuclear products, primarily designated for military purposes, including paramilitary material)*;
- 3) Commercial logging operations or the purchase of logging equipment for use in primary tropical moist forest or old growth forests;
- 4) Production or trade in wood or other forestry products other than from sustainably managed forests;
- 5) Destruction⁷ of High Conservation Value areas⁸;
- 6) Production or activities involving harmful or exploitative forms of forced labour⁹ and child labour¹⁰;
- 7) Production of, use of, or trade in, unbounded asbestos fibres¹¹;
- 8) Production of or trade in alcoholic beverages (excluding beer and wine)*;
- 9) Production of or trade in radioactive materials¹²;
- 10) Racist and/or anti-democratic media.
- 11) Any businesses, if any of the following activities represents a substantial portion of such business¹³
 - Gambling, gaming casinos and equivalent enterprises*;
 - Production of or trade in Tobacco or tobacco related products *¹⁴; or
 - Pornography;
- 12) Rooftop projects inside a facility manufacturing and storing explosives; a facility enriching, handling, storing radioactive material/nuclear fuel¹⁵ ;
- 13) Any Category A project.

Note: (*) Implies that this does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a project sponsor's primary operations.

¹ IFC's project exclusion list

(https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/company-resources/ifcexclusionlist)

² As specified in the 2004 Stockholm Convention on Persistent Organic Pollutants ("POPs"), see www.pops.int; the 2004 Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade and list of pesticides and herbicides subject to phaseouts or bans, see www.pic.int; and the 1992 Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, see www.basel.int; as may be amended from time to time.

³ A list of the chemical compounds that react with and deplete stratospheric ozone resulting in the widely publicized ozone holes is specified in the 1999 Montreal Protocol on Substances that Deplete the Ozone Layer, together with target reduction and phaseout dates see www.unep.org/ozone/montreal.shtml, as may be amended from time to time.

⁴ As specified in the 1975 Convention on International Trade in Endangered Species of Wild Flora and Fauna ("CITES"), see

www.cites.org, as may be amended from time to time

⁵ These will include, for example: large-scale pelagic drift net fishing and fine mesh net fishing, harmful to vulnerable and protected species in large numbers and damaging to marine biodiversity and habitats; and blast fishing.

⁶ As defined by the Basel Convention; see <http://www.basel.int>

⁷ Destruction means the (1) elimination or severe diminution of the integrity of an area caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the area's ability to maintain its role is lost.

⁸ High Conservation Value (HCV) areas are defined as natural habitats where these values are considered to be of outstanding significance or critical importance (See <http://www.hcvnetwork.org>).

⁹ Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

¹⁰ Child labor means the employment of children whose age is below the host country's statutory minimum age of employment or employment of children in contravention of International Labor Organization Convention No. 138 "Minimum Age Convention" (www.ilo.org).

¹¹ This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.

¹² This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment in which the radioactive source could reasonably be considered to be trivial or adequately shielded.

¹³ For companies, "substantial" means more than 10 % of their consolidated balance sheets or earnings. For financial institutions, "substantial" means more than 10% of their underlying portfolio volumes.

¹⁴ Except, in the case of tobacco production only, with an appropriate timeframe for phase out

- A group of highly toxic chemicals, polychlorinated biphenyls are likely to be found in oil-filled electrical transformers, capacitors, and switchgear dating from 1950 to 1985.
- A list of pharmaceutical products subject to phaseouts or bans is available at <http://www.who.int>

¹⁵ Excluding Storing and using fast-decaying radioisotopes for medical purposes such radiopharmaceuticals, for radiology, radiation therapy etc.

APPENDIX B

PRILIMINARY SCREENING CHECKLIST (PSC)

APPENDIX B.1

PSC FOR ROOFTOP PROJECT INSIDE A HAZARDOUS INDUSTRY

APPENDIX C

TERMS OF REFERENCE FOR ESIA

APPENDIX D

ESMP FORM

APPENDIX D.1

RISK MAP: GREENFIELD PROJECTS

APPENDIX E

TERMS OF REFERENCE FOR FINAL SAFETY SCREENING

APPENDIX F

HAZARDOUS PROCESSES

[THE FIRST SCHEDULE] [See section 2 (cb) of THE FACTORIES ACT, 1948]

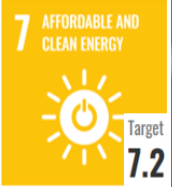







LIST OF INDUSTRIES INVOLVING HAZARDOUS PROCESSES

1. Ferrous Metallurgical industries
 - Integrated Iron and Steel
 - Ferroalloys
 - Special Steels
2. Non-ferrous Metallurgical Industries
 - Primary Metallurgical Industries, namely, size, lead, copper, manganese and aluminum
3. Foundries (ferrous and non-ferrous)
 - Castings and forgings including cleaning or smoothening/roughening by sand and shot blasting
4. Coal (including coke) industries
 - Coal Lignite, coke, etc.
 - Fuel Gases (including Coal Gas, Producer Gas, Water Gas)
5. Power Generating Industries
6. Pulp and paper (including paper products) industries
7. Fertilizer Industries
 - Nitrogenous
 - Phosphatic
 - Mixed
8. Cement Industries
 - Portland Cement (including slag cement, puzzolona cement and their products)
9. Petroleum industries
 - Oil Refining
 - Lubricating Oils and Greases
10. Petro-chemical Industries
11. Drugs and Pharmaceutical Industries
 - Narcotics, Drugs and Pharmaceutical
12. Fermentation Industries (Distilleries and Breweries)
13. Rubber (Synthetic Industries)
14. Paints and Pigment Industries
15. Leather Tanning Industries
16. Electroplating Industries
17. Chemical Industries
 - Coke Oven By-products and Coal tar Distillation products
 - Industrial Gases (nitrogen, oxygen, acetylene, argon, carbon dioxide, hydrogen, sulphur dioxide, nitrous oxide halogenated hydrocarbon, ozone, etc.)
 - Industrial Carbon
 - Alkalies and Acids
 - Chromates and dichromates
 - Leads and its compounds

- Electro chemicals (metallic sodium, potassium and magnesium, chlorates, perchlorates and peroxides)
 - Electro thermal produces (artificial abrasive, calcium carbide)
 - Nitrogenous compounds (cyanides, cyanamides, and other nitrogenous compounds)
 - Phosphorous and its compounds
 - Halogens and Halogenated compounds (Chlorine, Fluorine, Bromine and Iodine)
 - Explosives (including industrial explosives and detonators and fuses)
18. Insecticides, Fungicides, Herbicides and other Pesticides Industries
 19. Synthetic Resin and Plastics
 20. Man-made Fiber (Cellulosic and non-cellulosic) industry
 21. Manufacture and repair of electrical accumulators
 22. Glass and Ceramics
 23. Grinding or glazing of metals
 24. Manufacture, handling and processing of asbestos and its products
 25. Extraction of oils and fats from vegetable and animal sources
 26. Manufacture, handling and use of benzene and substances containing benzene
 27. Manufacturing processes and operations involving carbon disulphide.
 28. Dyes and Dyestuff including their intermediates
 29. Highly flammable liquids and gases

APPENDIX G

SDGS ALIGNED WITH INVESTMENT IMPACT THEMES

 <p>7 AFFORDABLE AND CLEAN ENERGY Target 7.2</p>	 <p>MWh Renewable energy generated</p>	<p>Generation of clean renewable energy in MWh.</p>
 <p>13 CLIMATE ACTION Target 13.2</p>	 <p>tonnes CO2 emission avoided</p>	<p>Reduction in GHG emissions (tCO2) by supply of renewable energy to C&I.</p>
 <p>6 CLEAN WATER AND SANITATION Target 6.4</p>	 <p>'000 kilo litres Water conserved</p>	<p>Water saving per MW of power generation against a conventional power plant .</p> <p>Water conservation BY use of waterless robotic cleaning.</p>
	 <p>Jobs Created</p>	<p>Creating employment opportunities in the rural sector and in renewable sector (Green jobs)</p>
	 <p>Safe Working Hours</p>	<p>To aim for 100% safe working hour.</p>

APPENDIX H

TERMS OF REFERENCE FOR ESGDD

APPENDIX I

STANDARD STAKEHOLDER ENGAGEMENT PLAN

Stakeholders	Objective of Engagement	Methods of Consultation and Engagement	Frequency of Consultation & engagement
Land Sellers	To Seek support if required	<ul style="list-style-type: none"> ■ Attendance in Unit functions/occasions or seek their support as and when required. 	<ul style="list-style-type: none"> ■ Meeting and invitation in events
Contractors	To appraise about labour working condition and compliance EHS	<ul style="list-style-type: none"> ■ Monthly Meetings (for the purpose of information dissemination, including information regarding labour laws, local employment opportunities, safety measures and discussion on grievances) 	<ul style="list-style-type: none"> ■ Meetings and monthly reporting in the operations phase
		<ul style="list-style-type: none"> ■ Information dissemination regarding welfare provisions for labourers, employment opportunities, grievances, EHS and CSR activities through notice board and display of key messages on billboard¹⁶ 	<ul style="list-style-type: none"> ■ As and when required
Contractual Labourers	To appraise about labour working condition	<ul style="list-style-type: none"> ■ Information dissemination regarding welfare provisions for labourers 	<ul style="list-style-type: none"> ■ As and when required
		<ul style="list-style-type: none"> ■ Grievances Redressal Mechanism (GRM) and EHS through notice board and display of key messages on billboard. 	<ul style="list-style-type: none"> ■ Regularly
		<ul style="list-style-type: none"> ■ Open interactions as and when required 	<ul style="list-style-type: none"> ■ Open discussion as per the requirement but at least quarterly, (when hired during the operations Phase)
Gram Panchayats	For necessary information disclosure of SEP. As Part of GRM ensure involvement in CSR activities and local procurement if required	<ul style="list-style-type: none"> ■ Consultations, meetings (FGD and individual interview) and Discussions; 	<ul style="list-style-type: none"> ■ At least on an annual basis
		<ul style="list-style-type: none"> ■ Sharing of documents as part of the disclosure mechanism; 	<ul style="list-style-type: none"> ■ As and when required
		<ul style="list-style-type: none"> ■ Grievances Redressal Mechanism (GRM) 	<ul style="list-style-type: none"> ■ Regularly
		<ul style="list-style-type: none"> ■ Attendance at Panchayat meetings and participation in CSR activities. 	<ul style="list-style-type: none"> ■ Regulatory requirements
Regulatory Authorities	Compliance to regulatory requirements	<ul style="list-style-type: none"> ■ Meetings and Discussions 	<ul style="list-style-type: none"> ■ As per the regulatory requirements or as and when required
District Administration	Regular engagement Participation in CSR Activities	<ul style="list-style-type: none"> ■ Regular meetings and participation in CSR events 	<ul style="list-style-type: none"> ■ As and when required
Local Community	Information disclosure, Managing and ensuring participation in CSR activities	<ul style="list-style-type: none"> ■ Half Yearly Open Meetings 	<ul style="list-style-type: none"> ■ Half Yearly
		<ul style="list-style-type: none"> ■ Interactions with community at Gram Panchayat 	<ul style="list-style-type: none"> ■ At least annually or as and when required

(1) The information to be posted on the bulletin boards is to include information pertaining to the project activities and the time schedule for the same, safety norms and precautions mandatory in the project, CSR activities to be undertaken, local employment opportunities and any other announcements/information relevant to the sub-contractors and labourers.

Stakeholders	Objective of Engagement	Methods of Consultation and Engagement	Frequency of Consultation & engagement
	As part of and GRM	■ Sharing of CSR reports and other documents as part of the disclosure mechanism and the GRM and	■ At least annually
		■ Involvement in CSR activities	■ As and when required
Agricultural Labourers	For necessary information Managing and ensuring participation in CSR activities As part of GRM	■ Open Public Consultations	■ At least annually
		■ Sharing of reports and other documents as part of the disclosure mechanism (Provisioning of reports in Hindi/local language)	■ At least annually
		■ Involvement in CSR activities	■ As and when required
Vulnerable Community including Women	Managing and ensuring participation in CSR activities As part of GRM	■ Discussions, FGD, Open meetings and consultations with each category,	■ At least Half Yearly
		■ Grievances Redressal Mechanism (GRM)	■ At least annually
		■ Involvement in CSR activities	■ As and when required
Village Institutions (Panchayats, Schools, PHC, etc.)	Managing and ensuring participation in CSR activities	■ Discussions, Consultations and Open Meeting and discussions, FGDS	■ At least annually or as and when required
		■ Involvement in planning and implementation of CSR activities	■ As and when required
Community Based Organisations (CBOs)	Managing and ensuring participation in CSR activities As part of GRM	■ Involvement in CSR activities which include training programmes;	■ At least quarterly
Political Parties	Regular engagement	■ Meetings with the local representatives as and when required	■ As and when required
Media	Regular engagement	■ Disclosure of information and meetings (as and when required)	■ As and when required
Investors	Project Lifecycle	■ Inform investors about the growth and direction of the company through Annual General Meetings or Progress Reports/ Financial Results	■ Annually and as required

APPENDIX J

GRIEVANCE REDRESSAL MECHANISM

APPENDIX K


TRAINING MATRIX

APPENDIX K.1

TRAINING RECORD

APPENDIX L

SERIOUS INCIDENT REPORTING FORMAT FOR INVESTEE COMPANIES

		SERIOUS INCIDENT REPORTING FORM
[Name of Company]		
Date of report		
Company contact person		
Description of issue	<ol style="list-style-type: none"> 1. <i>Date and time of incident.</i> 2. <i>Type of incident: environmental issue, fatality, alleged fraud or other.</i> 3. <i>Name of person/s involved/injured/deceased, if applicable</i> 4. <i>Narrative and contextual information.</i> 5. <i>Whether incident was work or non-work related.</i> 6. <i>Causes of incident.</i> 7. <i>Status of investigation.</i> 8. <i>Listing of parties involved in investigation (witnesses and staff, unions, police, other authorities and other parties.</i> 9. <i>Publicity</i> 	
Follow-up by Company management	<ol style="list-style-type: none"> 1. <i>Company view of incident – degree of severity, possible uncertainties or disputed facts to be investigated.</i> 2. <i>Status of investigation.</i> 3. <i>Reports produced (and outstanding, if any).</i> 4. <i>Immediate actions taken by company and other parties.</i> 5. <i>Further actions to prevent re-occurrence of incident.</i> 6. <i>Monitoring/reporting arrangements to follow up on efficacy of actions taken.</i> 7. <i>Results to date of actions taken.</i> 	
Conclusion	<i>Next steps: whether to close the case, or proceed investigations, how to do so, and the rationale for it.</i>	