

# Environmental and Social Monitoring Report

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Semestral Report  
September 2013

## IND: 145 MW Grid Connected Solar Project Ujjawala Power Private Limited Safeguards Monitoring Report (March to September 2013)

Prepared by Hindustan Cleanenergy Limited

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**Environment and Social Safeguard  
Provisions & Compliance Management**

**UJJAWALA POWER PRIVATE LIMITED**

**KAMALPUR, Tehsil: Dasada  
Dist: Surendranagar,  
Gujarat, India**

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# CHAPTER 1 - PROJECT SUMMARY AND INFORMATION

Ujjawala Power Private Limited (UPPL) was incorporated on 15 September 2010 to setup a 25 MWp solar PV power project at village Kamalpur, District Surendranagar in the state of Gujarat (India). The project is implemented under the Solar Power Policy 2009 of Gujarat. Multi Crystalline Silicon PV solar cells shall be used in the project to generate electricity.

UPPL ("the company") has already signed a PPA for 25 years with Gujarat Urja Vikas Nigam Limited (GUVNL) with permission from Government of Gujarat, for sale of power generated from the project. The project was commissioned in 31<sup>st</sup> March 2013.

Sl. No	Particulars	Descriptions
1	Project site	Ujjawala
2	Village & District Name	Kamalpur, Surendranagar
3	Name of the state	Gujarat
4	Latitude & Longitude	23° 03' 27" (North), 71°51'.42" (East)
5	Road Accessibility	Road connectivity via Ahmedabad
6	Nearest Airport & City	Ahmedabad
7	Water requirement	13,000 LPD
8	Capacities of modules proposed (Wp)	The multi crystalline solar PV module of 230 Wp capacity
9	Project Cost (Million INR)	2956.53
10	Commissioning Date	31.03.2013



## Need for the Project

Fast economic growth of the state of Gujarat has resulted in increase in electricity consumption by the industrial and commercial sectors.

The Electricity Act 2003 stipulates minimum percentage of energy to be derived out of renewable energy sources which shall be binding on all states. Also the Gujarat Electricity Regulatory Commission has made it mandatory for distribution licensees in the state to purchase a fixed percentage of their total power procurement through renewable energy sources, both solar and non solar.

## Purpose/Objectives of Safeguards Monitoring Report

The purpose and Objectives of Safeguard Monitoring Report is prepared in accordance with the Safeguards Requirements, for monitoring and measuring the progress of implementation of the Environmental Management Plan and including any corrective and preventative actions.

The Annual report for period from fiscal year 2012-13 is prepared on its compliance with the measures identified for social protection requirement and safeguard policy statement of ADB. As per the requirement, the company shall provide annual social safeguard report on its compliance to ADB pursuant to Safeguard Policy Statement

The reports is prepared to ensure that company is in compliance with the core labor standards are the elimination of all forms of forced or compulsory labor; the abolition of child labor; elimination of discrimination in respect of employment and occupation; and freedom of association and the effective recognition of the right to collective bargaining, as per the relevant conventions of the International Labor Organization;

The company complies with all applicable labor laws in relation to the Project, and takes the following measures to comply with the core labor standards for the ADB financed portion of the Project;

(a) carry out its activities consistent with the intent of ensuring legally permissible equal opportunity, fair treatment and non discrimination in relation to recruitment and hiring, compensation, working conditions and terms of employment for its workers (including prohibiting any form of discrimination against women during hiring and providing equal work for equal pay for men and women engaged by the Borrower);

(b) not restrict its workers from developing a legally permissible means of expressing their grievances and protecting their rights regarding working conditions and terms of employment;

(c) engage contractors and other providers of goods and services:

(i) who do not employ child labor or forced labor;

(ii) who have appropriate management systems that will allow them to operate in a manner which is consistent with the intent of (A) ensuring legally permissible equal opportunity and fair treatment and non discrimination for their workers, and (B) not restricting their workers from developing a legally permissible means of expressing their grievances and protecting their rights regarding working conditions and terms of employment; and

(iii) whose subcontracts contain provisions which are consistent with paragraphs (i) and (ii) above.

## CHAPTER 2 - RELEVANT ENVIRONMENTAL PERMITS AND CLEARANCES

Ministry of Environment and Forests (MoEF) is the nodal agency for drafting the new environmental legislations and giving the Environmental Clearance (EC) to the projects.

MoEF in its Office Memorandum No. J-11013/41/2006-IA.II (I) dated 13th May, 2011 stated that the Solar Photovoltaic Power Projects are not covered under the ambit of EIA Notification, 2006 and hence, no environmental clearance is required. Hence, the Solar Power PV Project does not require preparation of Environmental Impact Assessment Report and pursuing Environmental Clearance from Central Government or State Level Environmental Impact Assessment Authority.

For the Gujarat State, the State Level Environment Impact Assessment Authority (SEIAA) and the State Level Expert Appraisal Committee (SEAC) were constituted vide the MoEF, GOI, Notification No. S.O.948 (E) dated 12-06-2007 and the Gujarat State, Forests and Environment Dept. Resolution No. ENV/10.2006/176/P dated 25/07/2007. In addition, the Gujarat State Pollution Control Board's guidelines for project proponents apply to all state projects.

The company has taken following permits and clearances for operation and maintenance of the project under national and local statutory regulations

COMPLIANCE STATUS				
SPV Name	Registration under Contract Labour Act	Consent to Operate	Plan Approval and Registration for Factory License	O&M Labour License
Ujjawala Power Private Limited	Obtained	Obtained	Obtained	Obtained
	Dtd-21-Feb-12	CTO No-14092	Lic No-17643	Reg No-3955
		Dtd-31-May-13	Dtd:1-Jan-13	Dtd-4-Oct-13
Status	One Time Registration	Due date :31-May-18	Due date -31-Dec-2014	Due date -31-Dec-2014

## CHAPTER 3 – GRIEVANCE REDRESSAL MECHANISM

Environmental and social grievances are handled in accordance with the project grievance redressal mechanism defined under the HR policy for contractors. The Grievance Redressal Mechanism (GRM) for the project provides an effective approach for complaints and resolution of issues made by the affected community in a reliable way. This mechanism was established prior to construction and will remain active throughout the life cycle of the project. Open and transparent dialogue will be maintained with project affected persons as and when needed, in compliance with ADB safeguard policy requirements.

The major objectives of the Grievance Redressal Mechanism System are to:

create a platform / process for prevailing proactive IR; make people accountable for timely redressal of grievances; establish a robust process for addressing contract worker grievances; create a healthy working atmosphere and drive active engagement at contract worker level; have a strategy, supporting long-term business requirements at site; prevent minor disagreements developing into more serious disputes later on; defend against legal intervention

A Grievance Redressal Committee (GRC) was formed at the project site to ensure affected person's grievances on both environmental and social concerns are adequately addressed and facilitate timely project implementation. The GRC comprises the following members:

- a) Project head;
- b) Liasoning officer – Site In charge/Admin;
- c) Land seller /local community representative

### **Handling grievances**

The company representative regularly visits to villages to capture project affected families grievances on continuous basis and record the same through public and individual meetings. Grievance redressal registers are maintained at the Time office and other locations as may be decided by local HR Head on site:

Communication was made to all contractor staff regarding the 'Dos' and 'Don'ts' and they were apprised about the discipline amenable with the local customs and traditions during their association with the project.

At the project site, there were no grievances reported.



## CHAPTER 4 – OCCUPATIONAL AND COMMUNITY HEALTH AND SAFETY

There are no occupational hazards expected in the solar power plants during operational phase of the project. However, the company is already ensuring medical fitness certificate of all associates working in the plant by the qualified medical practitioners.

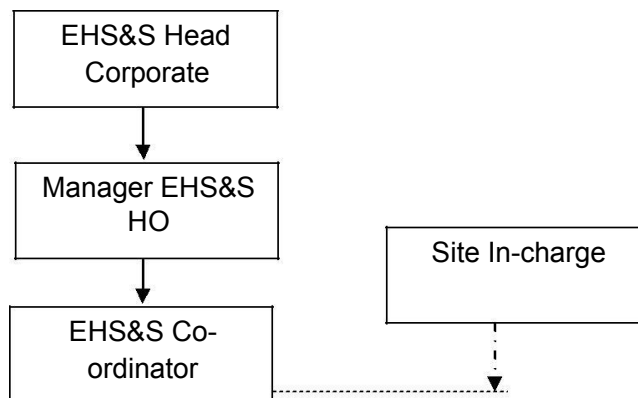
The company regularly undertakes training programs on safety aspect by imparting training on electrical, fire and on job safety including first aid training.

There were no incidents reported of any safety event or out reach activities during the reporting period.

## CHAPTER 5 - ENVIRONMENTAL MANAGEMENT CAPACITY

### Organizational structure

The following is the organizational structure in place for the EHS team:



 Functional Reporting

 Administrative Reporting

The company has an EHS department at corporate and business unit level, headed by Senior Manager – EHS. The Company is fully committed to its environmental and social responsibility and discharges this responsibility in adherence to principles of good corporate governance guidelines. Its staff and contractors are fully committed to their environmental responsibility and discharge their responsibility within company's EHS guidelines and operational framework. The duties of the EHS department at site level are to:

- ✂ Implement the EHS manual guidelines and environmental good practices at site.
- ✂ Advise and coordinate the contractor(s) activity towards effective management of environment, health and safety aspects.
- ✂ Train all company employees including contract workers at site to make them aware on various EHS practices and guidelines to be followed at site.

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Carrying out internal EHS audits at defined intervals, identify the existing EHS gaps at the site and report the findings of the audit to the EHS head.

Further, monthly EHS apex committee meeting is held once every month (generally, on 2nd Friday's of the month) whose participants includes Corporate Head (EHS), Vice President (O & M) along with the site head and the EHS coordinator to discuss on the EHS perspective of the site.

The company has standard procedures and manuals to ensure the implementation of any E&S Concerns namely

- 1- Procedure for Waste Material Handling and HSD/ Transformer oil/ chemical storages
- 2- Procedure for Restriction / Identification of Child labour deployment
- 3- On site emergency and Disaster control plan
- 4- Grievance Handling Mechanism
- 5- Aspect – Impact Study
- 6- Social and Environment Management Plan
- 7- Work to Permit Procedures
- 8- EHS Manual
- 9- EHS Policy
- 10- Isolation Procedure – Electrical
- 11- Copy of Contractor EHS Clause Agreement

## CHAPTER 6 – STAKEHOLDER CONSULTATION

During the year, informal stakeholder consultations were carried out with the local community to provide an overview of the project activity and to understand their needs and concerns.

During the informal meetings with local community, the Company made a presentation on the project, development prospects, and project impacts. The prospects of further improving social and economic status of the region as a result of a successful project implementation. The further CSR activities that company proposes is maintenance of up gradation of village drainage system, solar lights to temple, drinking water facility and women empowerment programmes etc.

## CHAPTER 7 – COMPLIANCE WITH APPLICABLE ENVIRONMENTAL AND SOCIAL REQUIREMENTS

A detailed EHS & Social Safeguard Compliance for Operation & Maintenance is prepared and all corrective actions are being complied.

The framework consists of the compilation of the complete information on the operation of the solar farm facility and its potential sources of pollution through technical inspection. This inspection, which is conducted at facility, allows the activities that are programmed and entrusted to the operational branches to be carried out in order to correct the different problems detected at their sources or to foresee conservation and maintenance.

The details of compliance during pre- construction, construction, operation and maintenance with environmental and social requirement are provided as per Annexure -1 below on the subject.

# CHAPTER 8 - CONTRACT WORKER WORKING REGULATIONS

Purpose & Objectives: -

- a. To work towards a fair and effective Contract worker Management procedure throughout the locations.
- b. To frame general guidelines for Recruitment of Contract worker across the locations.
- c. To recruit right contract worker for the first time and every-time with the desired skills and attributes to enable the company to fulfill its corporate aims and objectives.
- d. To distinguish between acceptable and non-acceptable general attributes / traits of Contract worker
- e. To motivate and encourage the contract worker so that they can contribute their best towards the organizational goals and even the management can optimum use their skills and capabilities.
- f. To inculcate awareness to all our concerned HR / Time Office officials making them aware about the procedure that they need to adhere with Contract worker Management.

Definition: - Contract Worker

Contract worker are the personnel, sub-contracted through Contractor / Service provider / Vendors for the nature of job as defined in the contractor's Labour License / Agreement duly approved by the concerned Government authority and Management for the same as per the rules and regulations under the Contract Labour (Regulation and Abolition) Act, 1970 and the rules made thereafter.

Contract worker shall be recruited for only a limited time-period as decided by Location HR Head. They shall be the employees of Contractor / Service Provider/ Vendor and are not employees of Moser Baer in any form but could be located in our premises on Contractor/ Service Provider/ Vendor only. They shall receive their payment / dues from the Contractor / Service Provider / Vendor only.

Scope: -

This SOP is applicable across the all locations of Solar Farms and describes the procedure of Contract workers management across the Plants. It also specifies working regulations for Contractors / Service Providers / Vendors.

Respective location Heads / Plant's Time-office shall be the process owner and responsible for implementation of this SOP and all points of EHS Clause Agreement between contractor & occupier duly signed mutually of contract workers Management.

Wages

- All Contract worker shall be paid Minimum Wages
- Bonus, if applicable, shall be paid as per guidelines of the Management.

#### Provident Fund

- Provident Fund (PF) shall be paid to all in accordance with Provident Fund Act' 1952

#### ESI

- Provision of ESI Act, 1948 will be applicable all employee drawing salary up to Rs.15000/- PM.
- In case if ESI is not applicable then the Provision of Workmen's Compensation Act, 1923 shall be applicable.

#### Working Hrs

- It shall be 8 Hrs. working shift + ½ Hrs. lunch / Breakfast.
- They will work in two shift which will rotate on weekly basis
- Overtime will be governed as per the applicable statute.

## Contract Worker Management

S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
<b>1. RECRUITMENT GUIDELINES</b>				
1.1	<p><b><u>Short listing of Candidates:</u></b></p> <p>a. Recruitment criteria shall follow as under with documentary proof.</p> <p>b. Physical appearance should be sound</p> <p>c. <b>Age group</b> above 18 Years.</p> <p>d. Candidates shall produce Original along with a photocopy of all his testimonials.</p> <p>For Age Proof: Mark-Sheets and Certificates of High School or Birth Certificate issued by Registrar Birth &amp; Death. Incase both these are not available then Certificate from Dental Surgeon should be obtained.</p> <p>Photo ID Proof: Voter ID. Card / Driving License/ Admit Card of High School or Intermediate Examination / Certificate from Gram Pradhan / Any other document / Domicile issued by DM / SDM / Domicile from Tehesildar – Anyone of them.</p>	At the time of joining	office	All the documents verified by Admin/site in charge before deployment of the candidate. No any observation of deployment of below 18 years of employees at site till now.
12	<p><b><u>Pre Joining Formalities:</u></b></p> <p>Every selected candidate shall submit / fill up the following documents at the time of joining.</p> <p>a) Photographs (6 Passport size + 2 Post Card Size)</p> <p>b) Attested Copy of Photo ID Proof.</p> <p>c) Fill up the Bio Data form provided by the respective contractor.</p> <p>d) Declaration form no. 1 of ESIC</p>	Same day	Contractor/Admin	



S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
	with photograph pasted.  e) Declaration Form no 2 of Employee Provident Fund.			
1.3A	<b><u>Post Joining Formalities:</u></b>  1. Appointment Letter: - Ensure counter signature / receipt on the Terms of Appointment which is to be kept in his Personal File.  2. Organize Induction: - All newly recruits shall undergo comprehensive Induction training. It will include information on the standards expectation to those working on the site, EHS training, Transport facility, behavioral training, Rules & Regulations, Wages & Salary, Time Office functioning, Demonstration of the behavior while on duty.  3. Nobody shall be allowed to enter Company Premises without ID and Attendance card. I.D. Card is required to be properly displayed at all times while on duty.	Same day	Contractor /Time office	Induction training carried out for newly recruited employees
	a. Contract worker personnel records shall be maintained & to be kept and made available in Company at all times.		Contractor /Time office	Available at sites
	b. Feed complete master data in computer / Payroll as per "Annexure -3" to obtain Attendance I.D.No. of contract worker	Day one	Time Office Personnel responsible for contract worker mgmt	Available at sites
	c. Feeding log shall be available to identify, who & when feeded the data. (IT to make provision)			
	d. Each of the Candidates, within 10 days of his joining, shall be issued a T.I.C. (Temporary Insurance Card) to avail ESI benefits.		Contractor/Time office	As per applicability at the location

S.NO		ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
	e.	Every Contractor shall ensure issuing of ESI Card within 45 days of the joining of the contract worker.	Within 45 Days of Joining	Contractor/Time office	As per applicability at the location
	f.	Every contractor shall ensure regular payment of monthly social security and ESI contributions			

**Information on Staff and Contractors and Subcontractors Workers during the reporting period:**

1. Type and number of Workers :Information Include along with enclosed sheet of Contractor Details

Type of Worker	Number of Workers			Salary Scale		
	Male	Female	Total	Male	Female	Minimum wage
a. Permanent Staff						As per company policy..
(i) Managerial	1	Nil	1			
(ii) Engineering/Technical						
(iii) Clerical						
(iv) Utility						
b. Contractual ( Including subcontractors)						As per applicable Min wage notification of the state Govt
(i) Skilled	8		8			
(ii) Semi-skilled	7		7			
(iii) Unskilled	2		2			

2. Place of origin

- (i) Number of workers from nearby villages (within 10km) and villages in the same district: 2 Nos
- (ii) Number of workers from other districts in the same state: 4 Nos

(iii) Number of workers from other states : 11 Nos

S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
<b>2 ATTENDANCE MANAGEMENT</b>				
2.1	<p>a. While coming on duty contract worker will mark/Sign the attendance card at the Main Gate. This marking/Sign is only for authorizing entry and shall not be treated as valid entry for attendance purpose.</p> <p>b. At the time of Attendance Marking all Contract workers shall display the identity card/authorization on his shirt pocket, which shall be checked by Security Guard.</p> <p>c. At the time of In-coming &amp; Out-going of each shift, Contractor supervisor will be present at the Main Gate.</p> <p>d. <b>Shift Schedule:</b> Concerned Shift In-charges shall put the contract worker in the shift schedule &amp; select and recommend it in the system which shall get forwarded to Time office through HOD and same will get uploaded in the Attendance of the Time office 3 days prior to beginning of new month.</p> <p>e. Shift Time Keeper shall take out a department wise list of contract worker present in all shifts separately and make physical verification thru contractor's representative after one hour thirty minutes from the starting of in all three shift from the concerned shift In-charge.</p> <p>f. The system will accept only the attendance where it matches the</p>		Contractor/Time office	Daily monitoring of deployment of the personnel's by Contractor/Time office

S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
	<p>scheduled shift. Anybody attending duty other than that shall appear in discrepancy report and will have to be corrected by making necessary corrections in the shift schedule (IT to make provision).</p> <p>g. Concerned Shift/Project In-charge shall check the list and compare it with his shop floor deployment register and mention figure of present Contract worker in numbers &amp; words and sign on sheet with name and designation which shall be counter signed by contractor's representative and verified by Time Keeper.</p> <p>h. In case of any discrepancy in attendance the same shall be highlighted on the report and proper action of verification shall be done along with the concerned Time Keeper present in the same shift.</p> <p>i. In case any contract worker has to go out of the plant due to any exigency or personal work, casual work while on duty, contract worker will adhere the system as follows.</p> <p>j. Out Pass if required shall be produced at Main Gate by the contract worker at the time of leaving the plant and security will allow the person to go out only after checking the entry made by the Time office.</p> <p>k. The concerned contractor shall maintain record of out pass every month.</p>			
<b>3. WAGES AND SALARY ADMINISTRATION</b>				

S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
3.1.	Contractor's representative must be present in the shift according to shift schedule and maintain the required record and help Time Office in Physical verification etc., Payment Register/sheet of contract worker shall be checked & verified by time office In-charge.	Every month	Time Office / Admin	Payment register sheet checked & and verified by Site incharge every month before process the payment
3.2.	Concerned Contractor shall prepare and submit the bill to Time Office In-charge.	Upto 2nd of every month	Time Office	
3.3	a. Following document shall be available in the Time office /Contractor in the plant for audit / inspection for last six months. b. Payment Register / Sheet for each months. c. Paid ESIC challans along with the Return of Contribution. d. Paid EPF challans alongwith the Annual Return of EPF.	All time	Contractor/ Time Office	All the documents are available at site
3.4	e. Contractor will issue the wages slip (preferably In Hindi) to each contract worker before disbursement of their wages. (Annexure 18.) The format of Wage Slip could be uniform across all locations and should be at par the defined format as prescribed in the Contract Labour (Reg. & Abo) Act. 1972 & Rules made thereunder.	Before 7th	Contractor	
3.5	Wages to contract worker shall be disbursed according to Payment schedule In the presence of Time Keeper / Shift In-charge to ensure the payment properly made and will initial on each payment. During Payment the Identity and the attendance card of the	7th & 8th & unpaid on 11th & 12th and 22nd & 23rd every month	Time Office Contractor	Available with concerned contractors at sites.

S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
	contract worker shall be checked and in case of doubt the scanned photograph shall be used for verification prior to actual wage disbursement.			
3.6	Contractor shall be paid through cheque on or before 7th of every month.	On and Before 7 <sup>th</sup> of Each Month		Checked & cross verified by site incharge every month
3.7	Subsequently for all those who either were absent or have left the job and later on come for claiming the payment Time Office should facilitate the payment thru contractor and the contractor should raise a supplementary bill for such cases.	14th of every month	Time Office Contractor	Complied
3.8	<p>Corrections should be avoided in attendance sheet; payment sheet, or any other documents especially Statutory related. Incase needed, it should be counter signed by Factory Time-Keeper, All cutting deletion on sheet shall be authorized by the respective Location Time Office In charge.</p> <p>Payment sheet will have summaries with full detail. As per "Annexure -7"</p> <p>No sub-type entries shall be there. e.g.1A, 2A.</p> <p>Every Year the contractor should distribute the PF slips to the contract worker</p>		Time Office Contractor	
<b>4 LEAVE RULES AND APPLICABILITY</b>				
4.1	Leave shall be applied by the contract worker on the "Leave Card" format as prescribed in 'Annexure 8', The card shall be maintained by the concerned contractor.	All time	Contractor	

S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
	<p>a. Guideline / Eligibility of leave shall be as follows.</p> <p>b. CL 8/year (shall be given proportionately during the year and cannot be clubbed with any other leave, maximum three leaves at a time.</p> <p>c. SL 7 /year (shall be given proportionately during the year and can not be clubbed with CL. Leave more than two days shall require medical certificate.</p> <p>d. EL One leave for 20 days worked credited in subsequent year.</p> <p>e. No absence shall be regularized.</p> <p>f. The payment with respect of the leave taken by contract worker shall be paid in the monthly salary sheet.</p> <p>g. Contractor will maintain all statutory records which are applicable to the contractor</p> <p>h. Leave card shall be issued to each contract worker &amp; get the signature from the contract worker on Form 14.</p> <p>i. No advance Leave shall be credited/granted to contract worker</p>			Maintained
<b>5. FULL &amp; FINAL SETTLEMENT</b>				

S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
5.1	<p>Following procedure shall be adopted for full &amp; final settlement of employees leaving the services of contract.</p> <p>Full and final payment of contract worker leaving services during normal course shall be made on the spot by the contractor (As per <b>"Annexure -9"</b>) and will be claimed separately by raising bill to such effect. In case contract worker leave and do not turn up for Full &amp; Final, their full &amp; final shall be made on 15<sup>th</sup> &amp; 22<sup>nd</sup> of the preceding month.</p> <p>Un-paid wages if any, will be paid at the time of full &amp; final in presence of Time Office personnel.</p> <p>Punching card, ID card shall be taken back &amp; deposit to time office.</p> <p>It should be ensured that every month whatever, no of contract left the company whatever reasons, immediately their ID cards should be disabled from all machines access, inside our company.</p> <p>A detailed MIS in this regard should be submitted to Location HR Head on monthly basis without any failure.</p> <p>Balance PL calculated up to last working day shall be paid / encashed with the full &amp; final settlement.</p> <p>CL &amp; SL shall not be encashed.</p> <p>Contractors shall submit the</p>		Contractor/Time office	Available with concerned contractors at sites.{



S.NO	ACTIVITY	COMPLIANCE / DUE DATE	RESPONSIBILITY	Status of Compliance
	<p>claim of Full &amp; Final settlement only once in a month.</p> <p>✂ Full and final sheet shall be generated thru computer system only after "Date of Leaving" and "Reason of Leaving" is mentioned along with the other fields. System shall also generate MIS to this effect (As per "<b>Annexure 10</b>")</p>			
<b>6. MANAGEMENT INFORMATION SYSTEM (MIS)</b>				
6.1	<p>✂ Monthly MIS as per the Annexure 11, 12, 13 &amp; 14 shall be made on monthly basis and shall be available on-line to Officials authorized by HR including reports of pending full and final cases and absent &amp; left employees.</p> <p>✂ I.T. will make provision for generating various format i.e. 3A, 6A, 12A, Form 14 etc.</p>	As & when required	I.T	Available with concerned contractors at sites.

We also have separately Procedures for Deployment of Child Labour and Grievance Handling Mechanism system at all Solar Farms for effective execution. (Both procedures are enclosed herewith for ready reference please.)

### SOCIAL ACCOUNTABILITY

S.NO	ACTIVITY	RESPONSIBILITY	Status of Compliance
<b>1</b>	<b>CHILD LABOUR</b>		
	Contractor shall not engage in or shall not support the use of child Labour under the age of 18 years and communicate all employees for compliance.	Plant Head	Communicated in monthly meetings with Contractors.
<b>2</b>	<b>FORCED LABOUR</b>		
	The contractors shall not engage in or shall not support the use of forced Labour nor shall personnel be require to lodge “ deposit” or identity papers upon commencing employment with company.	Plant Head	NO any forced labour deployed in the plant same has been communicated in monthly meetings
<b>3</b>	<b>HEALTH &amp; SAFETY</b>		
	The contractors bearing in mind the privilege knowledge of safety and health with respect to the construction perspective hazards shall provide safe working environment and protection of ill health. Adequate steps to be taken for prevention of accident and injury to health during course of project. Necessary PPE (Personal Protective Equipment's) to be provided to workers. Dedicated safety in charge to be appointed at site.	PlantHead/EHSCo-ordinator	Communication, training has been given to the concerned employees /Contractors every month.
<b>4</b>	<b>FREEDOM OF ASSOCIATION</b>		
	The contractors are to ensure freedom of association and means of independent approach to the project manager		Organized Weekly/Monthly meeting with employees.
<b>5</b>	<b>DISCRIMINATION</b>		

S.NO	ACTIVITY	RESPONSIBILITY	Status of Compliance
	Contractors shall not engage in or support discrimination in hiring, remuneration, caste, access to the training, disability, gender and age. The contractors shall not allow behavior including gesture, language and physical contact that is sexually coercive, threatening and abusive.	Plant Head	This is a part of our induction training and also communicated to Contractors in monthly meetings.
6	<b>DISCIPLINARY PRACTICES</b>		
	Contractors shall not engage in or support the use of corporal punishment, mental or physical coercion and verbal abuse	Contractor/Site incharge	If required counseled by the contractors
7	<b>WORKING HOURS</b>		
	Contractors shall comply with laws of the land on working hours. The normal workweek shall be as defined by the law. Personnel shall be provided with at least one day off in every seven-day period. All overtime work shall be reimbursed at a premium rate.	Contractor/Plant Head	Working hours and weekly off has been displayed on notice board as per applicable labour laws
8	<b>REMUNERATION</b>		
	Contractors are to ensure that wages paid for standard working week shall always meet at least legal or minimum standards shall be sufficient to meet basic needs of personnel and to provide some discretionary income. Contractors shall ensure that deduction from wages are not made for disciplinary purpose and shall ensure that wage and benefits composition are detailed clearly and regularly for workers. Contractors also are to ensure that wages and benefits are rendered in full compliance with all applicable laws. Remuneration to be paid in a manner convenient to workers.	Contractor/Plant Head	Payments are being disbursing as per applicable minimum wages in the state.
9	Grievance mechanism for Company		

S.NO	ACTIVITY	RESPONSIBILITY	Status of Compliance
	<u>Ujjawala</u> staff and workers		
	<p>Employees are expected to discuss any problems, questions or grievances concerning employment with their Reporting Managers at the first instance</p> <ul style="list-style-type: none"> <li>▶ Any aggrieved employee may take up the grievance in writing with his/her Reporting Manager. The manager shall record his / her response on the representation within three days of its receipt and communicate the same to the aggrieved employee. The Reporting Manager may also consult the appropriate HR representative if required</li> <li>▶ If the employee feels dissatisfied with the Reporting Manager's response, the employee may forward the representation, along with the Reporting Manager's response to the concerned Function Head</li> <li>▶ The Function Head may consult with the Reporting Manager to ascertain the facts of the situation and shall convey his / her decision to the aggrieved employee within three days of its receipt and send a copy of the same to the BU HR Head</li> <li>▶ If the employee feels dissatisfied with the Function Head's response, the employee may forward the representation to the BU HR Head.</li> <li>▶ The BU HR Head shall constitute a Grievance Redressal Committee within three days to address the employee's grievance.</li> <li>▶ The Grievance Resolution Committee shall consist of the two Function Heads from within</li> </ul>	Plant Head/HR	<p>We have not received any grievance in writing till date; verbal counseling has been given to the concerns in some case</p>

S.NO	ACTIVITY	RESPONSIBILITY	Status of Compliance
	<p>the BU (other than the employee's concerned Function Head, BU HR Head and the Corporate HR Head. The Committee shall convey its decision to the employee within 15 day of the employee' representation to the BU HR Head.</p> <p>▶ All complaints shall be treated with utmost confidentiality and sensitivity. The 'Principles of Natural Justice'* would be followed during the process</p> <p>▶ The decision of the Grievance Resolution Committee would be final in this respect</p> <p>For any complaints regarding sexual harassment the committee constituted for the purpose shall process the complaint as per the appropriate Policy</p>		
	Any complaints or grievances raised with <u>Ujjawala</u> management	Plant Head/Site incharge	No any complaints /grievances has been raised till now
	Any complaints or grievances raised with district office labor commissioner	Site incharge/Admin	No any grievance /complaints raised to labor commissioner

### COMPLIANCE MANAGEMNT

We follow all above mentioned Social Safeguard Provisions during construction and operational phase through following objective driven targets:

- ☐ Social Safeguard Vision, Mission and Values based on good business principle to provide strong foundation of corporate governance and Compliance of all the applicable EHS Law s of the land.
- ☐ Capture and address voice of all stake holders, employees and other interested parties for any unsafe condition, near miss, working conditions and grievances.
- ☐ Incorporate Social Accountability in contract and cascade in to the plant operation to achieve compliance. As regard to Economic Sustainability, we are well ahead and steady.

With this Social Responsibility, our utmost strategic drivers are nominated for long term sustainable development

### **Separate Safety & Health department**

Separate Environment, Health & Safety department exists at facility and organization level.

Corporate Head - Environment, Health & Safety is in charge with the qualified EHS team consisting of Sr. Engineers/Jr. Engineers and supervisors to ensure the following compliance:

- Identify the aspects/impact arising out of the project stage / operational activities and anticipate the consequences of the non compliances.
- Outline explicitly the utilization of the existing resources both in terms of man, machine and material to eliminate the social hazards or letting any incident develop into a major grievance.
- Should any grievance occur, record in register for both internal and external resources? Cope up with it and address problem.
- Train all associates including contractor's workers to develop one's skill, attitude and knowledge on various Social Safeguard perspective.

### **EHS Core Committee:**

A nine members EHS core committee has been set up under chairmanship of the respective VP-operation, includes the heads of all departments, which meets on monthly basis to review the progress.

### **Role and Representation of Employees and Contactors:**

All employees are encouraged and motivated as EHS&S is part of the life. We have safety recognition scheme for reporting near miss, achieving zero EHS violation, zero accident.

EHS Coordinators Team is formulated across the plant and all audits, improvement projects are being driven by the team.

Monthly EHS Apex meeting being held and all inputs and observations are discussed for CAPA

### **How do we balance and resolve conflicts:**

Environment, Health, Safety & Sustainability is the most important aspects of the organization to set its oars heading way to ultimate of uninterrupted production, through adoption of a structured approach for identification of significant aspects / risk, their evaluation and control of the impact.

# ANNEXURE 1

## COMPLIANCE WITH APPLICABLE ENVIRONMENTAL AND SOCIAL SAFEGUARDS REQUIREMENTS

### Potential environment and social impacts and their mitigation and monitoring plan

Compliance status on the actual mitigation measures on each potential impacts identified (from pre-construction, during construction and operation) are given below.

#### A. Pre - Construction Stage

##### 1. Acquisition of Land

Potential impact	Mitigation action plans	Monitoring frequency	Responsibility	Compliance status
Loss of land, livelihood, assets, etc	<ul style="list-style-type: none"> <li>▶ The Company shall conduct meaningful consultations with affected people in the issues of land acquisition, or loss of livelihood, if any</li> <li>▶ Compensation for land and any existing assets shall be negotiated on the basis of current Gujarat government norms</li> <li>▶ Avoid farming season wherever possible for the acquisition</li> <li>▶ Giving priority in jobs to the local people with first priority given to the project affected family</li> </ul>	Continuous throughout the land acquisition process	Land acquisition team and HR/Admin team	Mitigation action points were strictly followed and given job to the local people during construction phase under their skill ability.

##### 2. Temporary use of project land for storage of project equipments, material

Potential impact	Mitigation action plans	Monitoring frequency	Responsibility	Compliance status
Impact on soil and water	<ul style="list-style-type: none"> <li>▶ The equipment and construction material shall be placed at least 500m away from water bodies (if any), natural flow paths and residential areas</li> <li>▶ Equipment and materials shall be stored at designated areas with concrete flooring to avoid any spillages which may lead to soil or ground water contamination.</li> </ul>	Continuous during pre-construction	EHS team	Followed

##### 3. Site Clearing and leveling

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Soil erosion	<ul style="list-style-type: none"> <li>▶ Planning and designing the development within the natural constraints of the site;</li> <li>▶ Minimizing the area of bare soil exposed at one time (phased grading);</li> <li>▶ Avoiding the unnecessary clearing of the site,</li> <li>▶ The topsoil in non-built up areas</li> </ul>	Continuous	EHS team/Civil Department	Soil compaction reports are generated by an external third party and relevant action (rolling, water sprinkling, etc) are taken as per

| would be restored and such portions | | the remarks of |



	of the site would be replanted with appropriate plant species to stabilize soil			the report.
Air pollution	<ul style="list-style-type: none"> <li>▶ Water sprinkling shall be practiced</li> <li>▶ Construction machinery shall be properly maintained to minimize exhaust emissions of CO, SPM and Hydrocarbons.</li> </ul>	Continuous	EHS team	Adherence to the procedure norms.

#### 4. Establishment of Labour Camp

Potential impact	Mitigation action plans	Monitoring frequency	Responsibility	Compliance status
Health Risks	<ul style="list-style-type: none"> <li>▶ Provision of separate mobile toilet facilities for men and women shall be made.</li> <li>▶ The domestic effluent shall be properly disposed off in soak pits.</li> <li>▶ Contractor shall provide garbage bins to all workers' accommodation for dumping wastes regularly in a hygienic manner in the area</li> </ul>	Continuous	EHS team and the Contractor	<p>Mobile toilets provided for men &amp; women.</p> <p>Soak pit was made</p> <p>Waste collection drums were placed by the contractor at the site</p>
Chances of spread of sexually transmittable diseases like AIDS	<ul style="list-style-type: none"> <li>▶ Awareness programmes to be conducted regularly for workers on AIDS, and other health related issues.</li> <li>▶ Health checkup facilities for employees and contract workers</li> </ul>	During Construction	Medical representative at site	Same followed
Water pollution	<ul style="list-style-type: none"> <li>▶ Separate Mobile Toilet facilities shall be made available for male and female workers. The domestic effluent shall be properly disposed off in soak pits.</li> </ul>	Continuous	Contractor	Followed
Land contamination	<ul style="list-style-type: none"> <li>▶ Basic sanitary facilities shall be provided for the workers staying at the labour camp and at the project site.</li> <li>▶ Dustbins shall be provided at the camp by the contractor</li> </ul>	Continuous	Contractor	Sanitary and dustbin facilities were provided during Construction phase.

#### Construction phase

##### 1. Construction of Internal roads, and development of other areas

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Impact on Air quality-- The impact on air quality will be for short duration and confined within	<ul style="list-style-type: none"> <li>▶ Activities like digging and filling are to be avoided in conditions of very high wind and covers to be provided for loose</li> </ul>	Continuous	EHS team	Strictly followed



the project boundary and is expected to be negligible outside the plant boundaries. The impact will, however, be reversible, marginal and temporary in nature.	<p>construction material at construction site</p> <ul style="list-style-type: none"> <li>▶ Construction equipments are to be properly maintained to minimize exhaust emissions</li> <li>▶ Water sprinkling shall be practiced</li> </ul>	<p>Six monthly</p> <p>Continuous</p>	<p>Contractor</p> <p>Contractor</p>	Instructions were given and strictly complied by the contractor.
Impact on Water quality	<ul style="list-style-type: none"> <li>▶ The construction will be more related to mechanical fabrication, assembly and erection; hence the water requirements would be meagre. Soak pits will be made for disposal of sanitary sewage generated by the workforce. The overall impact on water during construction phase due to proposed project is likely to be short term and insignificant.</li> <li>▶ Also, consumption of water should be monitored and attempt should be made to avoid spills / wastages and ensure optimal consumption</li> </ul>	During planning layout and construction work	EHS and Civil team	Strictly followed and water consumptions record were also maintained.

## 2. Movement of Vehicles

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Air pollution	<ul style="list-style-type: none"> <li>▶ All the vehicles entering the site to be asked to have updated PUC (Pollution under control) certificate.</li> <li>▶ Vehicle speed is to be restricted to 15km/hour at site</li> <li>▶ Trucks/dumpers are to be covered by tarpaulin sheets during off site transportation of friable construction materials and spoil</li> <li>▶ Maintenance of vehicles shall be carried out regularly</li> <li>▶ Sprinkling of water shall be practiced at the site</li> </ul>	Continuous	Contractor and EHS team	Counseling of drivers and conducted training and other relevant information before for all vehicles entering the plant premises.

Soil contamination	<ul style="list-style-type: none"> <li>▶ Proper maintenance of vehicle shall be carried out to avoid any leakage of oil or grease</li> </ul>	Annually	Contractor and O&M team	Adherence and maintenance of the vehicle checklist parameters is carried out for all the vehicles entering the plant premises
Water contamination	<ul style="list-style-type: none"> <li>▶ Proper maintenance of vehicle shall be carried out to avoid any leakage of oil or grease</li> </ul>	Annually	Contractor and O&M team	Properly checked at main entry gate before entering the vehicle inside the site.
Safety risks	<ul style="list-style-type: none"> <li>▶ Vehicle speed is to be restricted to 15km/hour at site</li> <li>▶ Necessary safety trainings shall be provided to the drivers of construction vehicles for speed restrictions and do's and don'ts to be followed during movement of construction vehicles</li> </ul>	Continuous	Contractor & EHS team	Counseling of drivers. & Training conducted on regular basis.

### 3. Excavation and drilling

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Occupational health hazards	<ul style="list-style-type: none"> <li>▶ Provision of adequate personal protective equipment like safety helmets, face masks, safety shoes, safety goggles etc. for the safety of workers</li> <li>▶ Training shall be imparted to workers on occupational safety and technical aspects of job undertaken by them</li> </ul>	Continuous	EHS team / Contractor and Civil team	Followed & time to time Training were conducted.
Air pollution	<ul style="list-style-type: none"> <li>▶ Water sprinkling at regular intervals during excavation and drilling activities shall be practiced to avoid generation of dust.</li> </ul>	Continuous	Contractor	Done
Noise pollution	<ul style="list-style-type: none"> <li>▶ Regular maintenance of plant equipment shall be carried out</li> <li>▶ Noise prone activities are to be restricted to the extent possible during night time.</li> <li>▶ Personal protective equipments shall be provided for workers performing drilling at site</li> </ul>	Annually  Continuous  Continuous	EHS team and Contractor	Followed

#### 4. Use of D.G sets

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Air pollution	<ul style="list-style-type: none"> <li>▶ D.G set to be optimally used with proper orientation and adequate stack height</li> <li>▶ Stack monitoring carried out on regular basis.</li> <li>▶ Proper maintenance of the DG Set carried out on regular basis</li> </ul>	At time of installation  Annually  Annually	EHS team / Contractor	Stack monitoring analysis done at the project stage.
Noise pollution	<ul style="list-style-type: none"> <li>▶ Acoustic enclosures are to be provided with the D.G sets to minimize the noise levels</li> </ul>	Installation period	EHS team	Provided

#### 5. Storage of Diesel

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Soil contamination	<ul style="list-style-type: none"> <li>▶ A covered area shall be defined for storage of HSD with concrete flooring</li> </ul>	Planning stage	Stores in-charge and EHS team	Area defined and followed
Safety risks	<ul style="list-style-type: none"> <li>▶ The diesel storage area shall not be proximity of the labour camps</li> <li>▶ Inflammable substance shall not be allowed at the project site.</li> </ul>	Continuous	Security guard and EHS team	Strictly executed

#### 6. Handling of Broken Solar Panels

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Land contamination	<ul style="list-style-type: none"> <li>▶ Broken or damaged solar panels shall be immediately shifted to a designated area in scrap yard to avoid any type of land contamination. A photograph is to be taken of the broken panel at the site to cater to Insurance settlement claims</li> <li>▶ The storage area shall have a concrete base</li> </ul>	Continuous	Site in-charge and EHS team	Adherence to the procedure for waste material handling and HSD/ Transformer oil/ Chemical storages (Doc No. EHS – WMH & S).
Health risks	<ul style="list-style-type: none"> <li>▶ PPE shall be provided to the workers handling the broken solar panels</li> <li>▶ The workers at site shall</li> </ul>	Continuous	Site in-charge, EHS and HR team	Followed

	be apprised about the potential health risks associated with handling of solar panels			
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## 7. Handling of Waste

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
<ul style="list-style-type: none"> <li>▶ Air Pollution</li> <li>▶ Soil Contamination</li> <li>▶ Water Contamination</li> </ul>	<ul style="list-style-type: none"> <li>▶ The excavated material generated will be reused for site filling and leveling operation to the maximum extent possible.</li> <li>▶ The scrap metal waste generated from erection of structures and related construction activities will be collected and stored separately in a stack yard and sold to local recyclers.</li> <li>▶ Food waste and recyclables viz. paper, plastic, glass etc will be properly segregated and stored in designated waste bins/containers. The recyclables will be periodically sold to local recyclers while food waste will be collected and composted at site</li> <li>▶ Hazardous waste viz. waste oil etc will be collected and stored in paved and bunded area and subsequently sold to authorized recyclers. Necessary manifest for the same will be maintained.</li> </ul>	<p>Continuous</p> <p>Continuous</p> <p>Within 90 days</p>	EHS team and Scrap Committee	Adherence to the procedure for waste material handling and HSD/Transformer oil/Chemical storages (Doc No. EHS – WMH & S).
Safety risks	<ul style="list-style-type: none"> <li>▶ Adequate PPE's shall be identified and provided to the workers at site.</li> </ul>	Continuous	EHS team	Followed

## 8. Installation and Operation of Concrete mixing machines

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Noise pollution	<ul style="list-style-type: none"> <li>▶ Noise shielding to be used where practicable and fixed noise sources to be acoustically treated for example with silencers, acoustic louvers and enclosures.</li> <li>▶ Provision of make shift</li> </ul>	At the time of installation	Technical team	Followed

	noise barriers near high noise generating equipment to minimize horizontal propagation of noise			
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## 9. Construction Labour Management

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Child labour and forced labour	<ul style="list-style-type: none"> <li>▶ Provision of clause in contractor's agreement that bans child labour and forced labour at project site.</li> <li>▶ Adequate procedures to avoid or prevent hiring/entry of child labour at the project site</li> </ul>	Continuous	HR and EHS team	Procedure for Restriction / Identification of Child Labour Deployment (Doc. No. – EHS – CLD), EHS clause agreement and HR policy.
Health and safety risks	<ul style="list-style-type: none"> <li>▶ Temporary creche facility may be provided in case of migrant laborers children residing in the camps to ensure safety</li> </ul>	Continuous	HR and EHS team	Provided
Water wastage	<ul style="list-style-type: none"> <li>▶ Emphasis shall be given on optimization of water usage and supply of potable drinking water for labour camps</li> </ul>	Weekly	Contractor	Provided
Pressure on forest produce	<ul style="list-style-type: none"> <li>▶ Fuel shall be made available to construction workers so as to reduce pressure on forest produce or local fuel wood resources</li> </ul>	Weekly	Admin team / Contractor	Provided

## C.Operation phase

### 1. Switchyard Operation

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Safety risks	<ul style="list-style-type: none"> <li>▶ Regular safety training shall be imparted to employee on electrical safety</li> <li>▶ Rubber mats to be provided near all high voltage areas</li> <li>▶ Cardiopulmonary resuscitation (CPR) charts to be displayed in the switchyard area</li> </ul>	Continuous  At the time of installation	Technical team	Ongoing process  Rubber mats provided  CPR chart displayed
Soil contamination	<ul style="list-style-type: none"> <li>▶ Regular maintenance and monitoring of the transformers shall be carried out to avoid leakage of transformer oil</li> </ul>	Annually	Technical team	Ongoing and followed

## 2. Use of Ground Water Resources

Potential Impact	Mitigation Action	Monitoring Frequency	Responsibility	Compliance status
Depletion of Ground water	<ul style="list-style-type: none"> <li>▶ A water meter shall be installed at water intake works to monitor total water consumption</li> <li>▶ Water reduction measures through periodic checking of pipeline leakages</li> <li>▶ Spills / wastages to be avoided and ensure optimal consumption</li> </ul>	Monthly	EHS Team	Daily water consumptions record maintained and followed.
		Weekly	EHS Team	

## 3. Decommissioning Phase

### 3.1 Removal and Disposal of Solar panels

Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Safety risks	<ul style="list-style-type: none"> <li>▶ Safety shoes, helmet and gloves shall be provided to the workers involved in removal of solar panels</li> </ul>	Before initiation	EHS team and contractor	<i>To be arranged as and when required.</i>
Soil contamination	<ul style="list-style-type: none"> <li>▶ The removed solar panels shall be immediately shifted to designated storage area to avoid contact with soil</li> <li>▶ In case of breakage or damage to solar panels, the panels shall be immediately shifted to a designated area in scrap yard to avoid any type of land contamination.</li> </ul>	Continuous	EHS team	<i>To be followed</i>

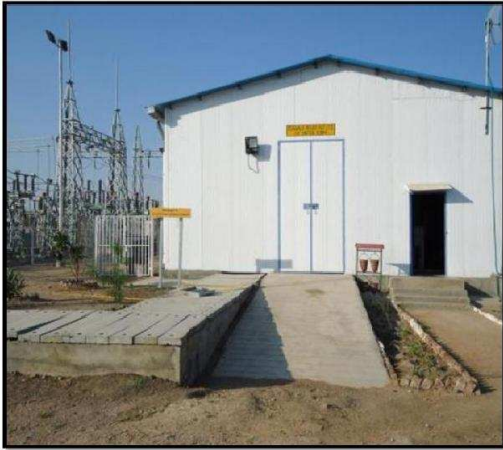
### 3.2 Restoration of Area



Potential impact	Mitigation action	Monitoring frequency	Responsibility	Compliance status
Land degradation	<ul style="list-style-type: none"> <li>▶ All the excavated construction material/debris from the foundations shall be disposed in a pre-determined landfill and shall not be disposed at the project site</li> <li>▶ Re-vegetation shall be done as appropriate of the exposed area.</li> <li>▶ All the waste generated till date shall be disposed in accordance of the applicable legislation</li> </ul>	Continuous	Civil team and contractor  EHS team EHS team	To be followed

# SITE PHOTOGRAPHS

## Plantation at Control Room Area



SAFETY



Fire Buckets

Fire Buckets

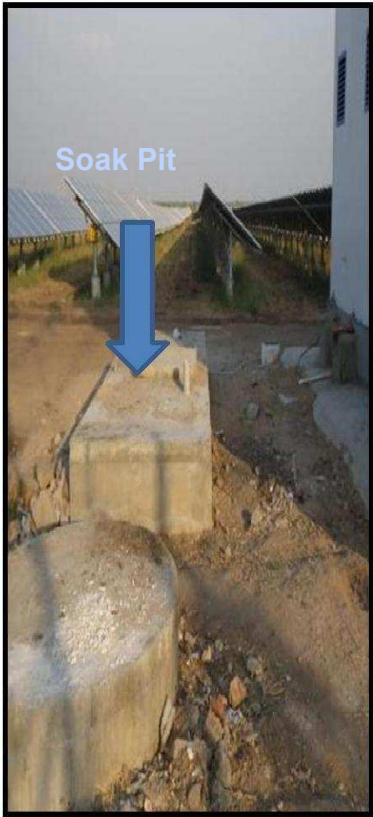
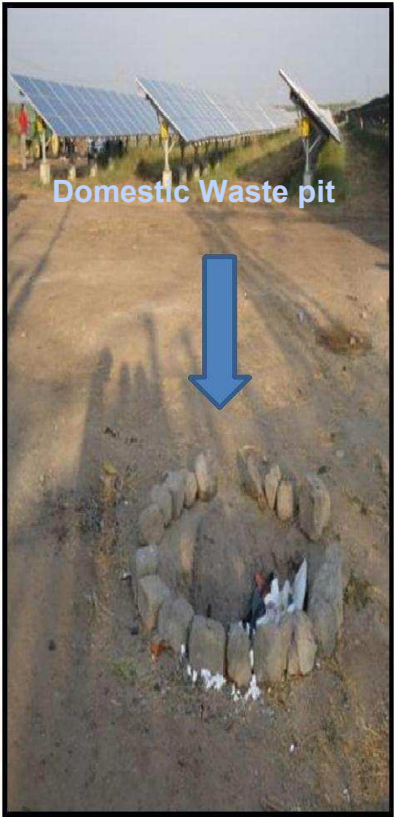


Scrap Collection Buckets

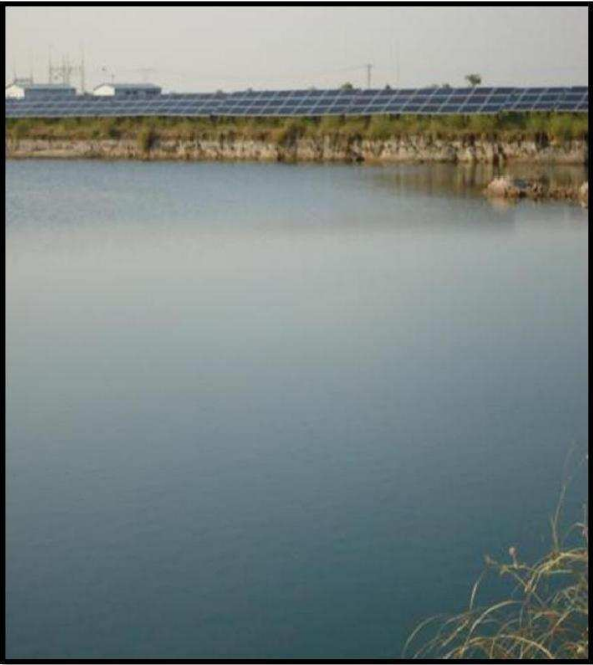
Scrap Collection Buckets



**Domestic Waste , Soak Pit & Hazardous waste collection/storage area**

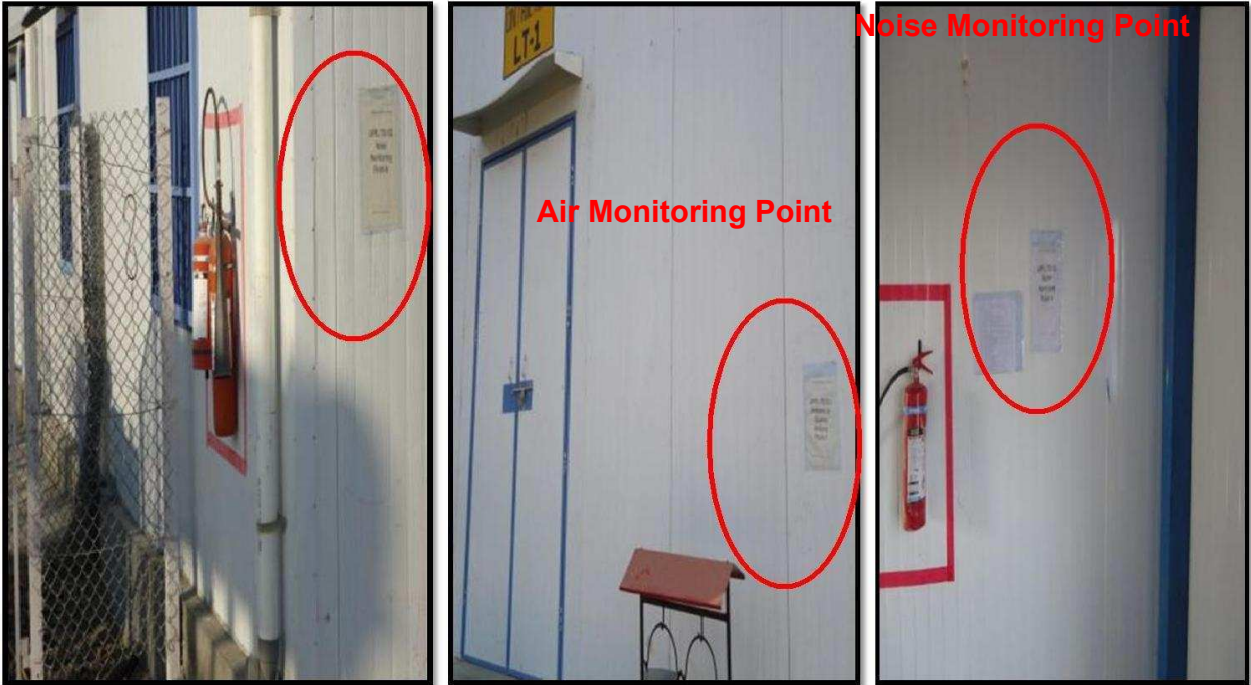


**Storm water collection Pond**





**Pollution Control & Monitoring Point**



**Raining Water Harvesting System**





## Plantation Near Switch Yard

