



Environmental and Social Monitoring Report

Annual Environmental and Social Monitoring Report
Number: 54237-001
December 2021

India: Sustaining Poultry Farmer Income and Food Security Project

Prepared by Suguna Foods Private Limited for Asian Development Bank

This environmental and social monitoring report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature.

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Asian Development Bank

SCHEDULE III - FORMAT OF SAFEGUARDS AND SOCIAL MONITORING REPORT

Safeguards and Social Monitoring Report (SSMR)

Reporting Period: [September 2020- November 2021]

Report Completion: 07.12.2021

ADB Project Number: [54237-001]

Suguna Foods Private Limited

Prepared by Suguna Foods Private Limited for Asian Development Bank.

A. SSMR SECTION I

The Debenture Subscription Agreement between ADB and the Suguna Foods Private Limited (the Agreement) requires among other things Suguna Foods Private Limited to prepare an Safeguards and Social Monitoring Report (SSMR) on the environmental and social (E&S) performance of all Company Operations (as defined in the Agreement). This document comprises ADB's preferred format for safeguards and social monitoring reporting. The main purpose of completing this form is to provide the following information:

- Organizational Structure, Capacity and Management Systems
- Significant Environmental and Social (E&S) Events
- Pollution Control Performance
- Occupational Health and Safety
- Social Safeguards and Community Engagement
- Labour
- Gaps and Corrective Measures

B. SSMR SECTION II

Company's Representation Statement certified by Authorized Representative

I Srinivasan N in my role of Chief Financial Officer and representing Suguna Foods Private Limited certify that:

- a. The Company Operations are in compliance with all applicable E&S Requirements as described in the Debenture Subscription Agreement, and all actions required to be undertaken pursuant to the Corrective Action Plan (CAP) and any subsequent management plans or supplemental action plans (where applicable: with the exception made for those that have been disclosed in Section VI in this report).
- b. In relation to the Company Operations, there are no:
 - Circumstances or occurrences that have given or would give rise to violations of Environmental, Social and Labor Laws or E&S and labor claims;
 - Social unrest, local population disruption or negative NGO/media/activist campaigns or activities against the Company Operations.
 - Material social or environmental risks or issues in relation to the Company Operations other than those already identified by ADB ahead of the date of its investment in the Company.

- To the best of the Company's knowledge, existing or threatened complaints, orders, directives, claims, citations or notices from any Authority due to E&S issues.
 - Any written communication from any Person (as defined in the Agreement), concerning any Company Operations, a failure to comply with any matter under the E&S Requirements (as defined in the Agreement);
 - To the best of the Company's knowledge, ongoing or threatened strikes, slowdowns or work stoppages by employees of the Company or any of its Subsidiaries or any contractor or subcontractor with respect to any the Company Operations;
- c. All information contained in this SSMR is true, complete and accurate in all respects at the time of submission and no such document or material omitted any information the omission of which would have made such document or material misleading.
- d. There have not been any new company activities under the Company Operations (e.g. expansions, construction works, etc.) that could generate adverse environmental and social impacts, or any new E&S Impact Assessment (ESIA) studies, audits, or E&S action plans conducted by or on behalf of the Company of any of its Subsidiaries (as defined in the Agreement), with respect to any E&S Requirements that ADB has not been notified about.

Srinivasan N

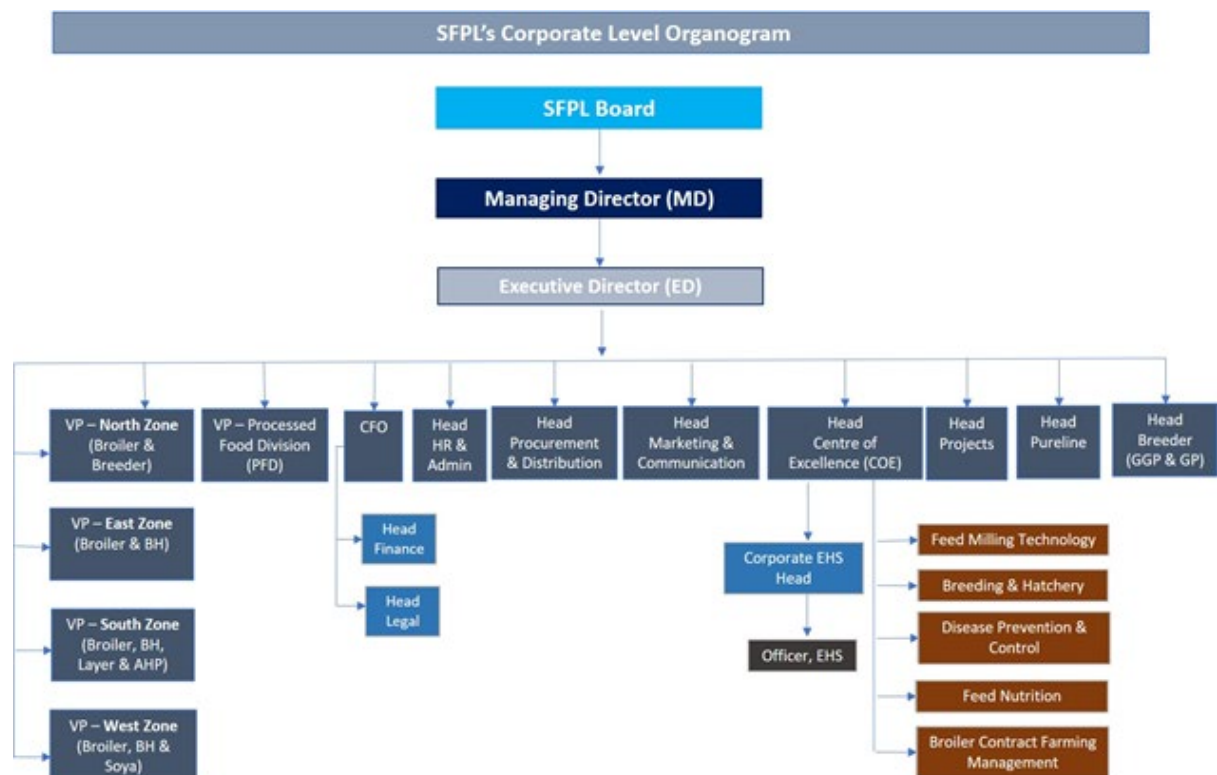
Chief Financial Officer

Date: 8/12/2021

C. SSMR SECTION III

I. Organizational Structure and Management Systems

(a) Organizational Structure



All these departments are different so names have to be given for each of the departments.

1. Corporate Chief Sustainability Officer - Respective Functional Heads of Centre of Excellence perform the role of CSO for their functions.
2. Environmental, Health and Safety Manager – Mr. Kunal Ranjan Gupta, Corporate EHS Manager
3. CSR Manager – Mr. Mohan Raj, Manager

In the above mentioned Organizational Chart, the main Organizational structure has been represented consisting of all departmental Heads. Not all the functional department has been mentioned since any changes on the Organization structure in ESMS could be done only after a joint discussion with AECOM including ADB & IFC.

Although we have Corporate Chief Sustainable officer who is mainly the Engineering and Project Head. Mr. Kumaresan along with Mr. Jayaprakash looks after technological aspects in

Engineering and in Projects and uses the right resources to maintain the energy efficiency including the material resource at projects to maintain the ecological balance.

Example: Fly ash bricks are being used instead of clay bricks to prevent the soil depletion, and across Suguna Engineering department have mainly been using the LED Bulbs/tubes as energy efficiency and cost saving initiatives including other energy efficient methods by engineering & Project department.

And for the CSR Manager/Head Mr. Mohanraj looks after CSR initiatives and reports to Head HR at the Corporate.

In the present EHS structure the Corporate EHS Manager/Head reports to the DGM HR/EHS and 12 safety professionals' reports to the Corporate EHS Manager/Head across all regions from different project facilities.

The details of the safety professionals along with their names are given below.

S.No	Emp code	Name	Region	Zone	Responsibility	Designation	Qualification	Total Years Of Exp & Comments
1	36015	Mr.Kunal Gupta	CO	All Zones	CO Safety Manager/Head	Senior Manager - EHS	B. Tech Mechanical, MS Management and Safety & Post Diploma in Industrial Safety	13 Y
2	23217	Mr.Krishnamoorthy .K	BH - Kaluthapatti EC Shed	South Zone	Breeder	EHS-Executive	Diploma in Petro chemical & Diploma in Industrial safety	11Y
3	33593	Mr.Chelladurai.D	Belgaum Processing Plant		Processing Plant	EHS-Executive	Bsc Physics & Diploma in Industrial safety	9 Y
4	29565	Mr.Magesh kumar.R.G	TN -VPM Feedmill		VPM Feed Mill	EHS-Executive	Diploma in ECE & Diploma in Industrial Safety	5 Y
5	39313	Mr.Ramdurai M.	KA - Hoskote Feedmill		Hoskote Feedmill	EHS-Executive	Diploma in Electrical & Electronics & Diploma in Industrial Safety	6 Y

6	39700	Mr. Dhananjaya kumari	TG- Toopran Feedmill		Toopran Feed Mill	EHS- Executive	Diploma in Engineering & Industrial Safety	8 Y
7	16300	Mr.Manoj S Dandekar	NS - Nagpur Soya	West Zone	West Zone Head - EHS	EHS - Incharge	B.Sc & Diploma in industrial safety, fire service engineering.	15 Y
8		Mr.Ajinkya	MH		Khadakjam Feedmill	EHS- Executive	Diploma in Mechanical & Diploma in Industrial safety	4 Y- Resigned - Position Vacant. New Candidates are getting Interviewed
9	39832	Mr. Parmar Klemence Antonbhai	GJ		Kalsar Breeder & Hatchery	EHS- Executive	B.SC Microbiology, Msc Environmental Science Diploma in Industrial safety	8 Y
10	34788	Mr.Manoj Carpenter	RJ - Palasana Feed Mill		North Zone Head - EHS	EHS - Incharge	B'Tech in fire technology &safety engineering	3 Y
11	36698	Mr.Rakesh Kumar	PB - Lalru Processin g Plant	North Zone	SL Processing Unit	EHS- Executive	Btech Fire and safety & Diploma in Electrical	3 Y
12	36503	Mr.Roshan Kumar	UP - Shahjaha npur Feed mill		UP &UK	EHS- Executive	Bsc Physics & Diploma in Industrial safety	10 Y
f	35435	Mr.Dipankar Pradhan	WB- Naihati Feed Mill	East Zone	East Zone Head - EHS	EHS - Incharge	Diploma in Civil,Diploma in Industrial & Fire safety	5 Y
14	37226	Mr. sudharsan Bhagat	BR - Purnea Feedmill		OA ,BR	EHS- Executive	Diploma in Engineering & Diploma in Industrial safety	3.5 Y

(b) Management System and Certifications

There are no specific voluntary management system certifications. However, we are having clear Standard Operating Procedures and policies for various operations and functions and follow best industry practices

With reference to the ESMS, policy document is yet to be finalized and the same is under vetting with ADB. On finalization of the ESMS document, we are looking at finalization of Annexures containing the SOPs.

Implementation of the ESMS will take place in a phased manner after due training in all the locations including corporate office and other locations. Implementation to be carried out through AECOM.

List of SOPs are given below

- Suguna Emergency response plan Framework
- Water and Wastewater Management – Processing Plant
- Water and Wastewater Management (Hatchery)
- Water and Wastewater Management (Feed Mill)
- Water and Wastewater Management (Breeder Farm)
- Air Emission Management (Breeder Farm)
- Air Emission Management (Feed mill)
- Air Emission Management (Hatchery)
- Air Emission Management (Process Plant)
- Waste Management Hazardous & Non-hazardous Wastes Breeder Farm
- Waste Management Feed Mills
- Waste Management Hazardous & Non-hazardous Wastes Hatchery
- Waste Management Hazardous & Non-hazardous Wastes – Process Plant
- For Undertaking ESIA, ESDD, IEE
- Site Screening, Project Categorization and E&S Assessment
- Contractor Management system
- Stakeholder Engagement Framework
- GENERAL E&S CLAUSES In Contract Agreement
- Grievance Redressal – Management Framework
- Grievance Redressal Mechanism Plan – Feed Mill
- Grievance Redressal Mechanism Plan – Hatchery
- Grievance Redressal Mechanism Plan – Processing plant
- Indigenous Peoples
- Land Procurement and Management
- Screening Checklist for Feed Mill
- Screening Checklist for Hatchery
- Screening Checklist for Processing Plant
- PPE Selection, Use and Maintenance
- Handling and Transportation Safety (Poultry)
- Heat and Cold Stress Management Feed Mill
- Heat and Cold Stress Management Hatchery
- Noise Management Feed Mill/Processing Plant/Hatchery
- Template – Occupational Health and Safety (OHS) Risk Register
- Stakeholder Engagement Framework – Corporate level

(c) Capacity Development

Various E&S related training and capacity development events, summary of training at corporate and subproject levels, training statistics etc. This includes emergency drills carried out over the reporting period.

HSE Consolidate Training Training	No.Of Staffs Staffs	No.Of. Workers	Total	Time Hrs	Total Hrs Hrs
1) Training	35	109	144		161.5
2) Training / Webinar	124	0	124		164.5
Total	159	109	268	0	326

Training Break up Region wise								
Date	Region	Unit Name	Training topics	No.Of Staff	No of workers	Total	Time hrs	Total hrs
TRAINING								
10-05-2021	PB	Rajpura feed mill	ADB/IFC Safeguard policies	2	0	2	12	
19/5/2021	SB	Naihati Feed Mill	Covid-19 precautionary safety measures & ADB/IFC Safeguard policies	20	0	20	1.5	35
29/5/2021	PB	Rajpura feed mill	Electrical safety and Fire Safety Training	4	7	11	22	22
29/5/2021	PB	Rajpura hatchery	Workplace Safety Measures, PPE'S Safety and COVID-19 safety precautions	2	11	13	26	26
18-05-21	KA	Hoskote Feed Mill	Electrical safety ,Chemical Safety,covid -19 safety precautions and	4	40	44	144	

			Workplace safety measures					
21-05-21	KA	Hoskote Feed Mill	Electrical safety ,Chemical Safety,covid -19 safety precautions and Workplace safety measures	1	10	11	111	
30.05.2021	TN	VPM feed mill	Covid-19 precautionary safety measures & ADB/IFC Safeguard policies	1	10	11	0.5	5.5
31.05.2021	HC	HF 1 (Pharma)	Covid-19 precautionary safety measures & ADB/IFC Safeguard policies	1	31	32	0.5	16
			Total	33	109	142		159.5
Training / Webinar								
21/5/2021	NB	All Unit	Transportation of Chemicals Risk Control measures	25	0	25	1.5	37.5
29/5/2021	AS	All Unit	Transportation of Chemicals Risk Control measures	21	0	21	1.5	31.5
29/5/2021	GP	GP-Feed mill	Covid-19 precautionary safety measures	7	0	7	0.5	3.5
18/5/2021	MH	All Broiler Branch Manager	Covid-19 precautionary safety measures	18	0	18		118
19-05-2021	UP	Broiler Branches	Covid-19 precautionary safety measures	42	0	42	1.5	63
25-05-2021	JH	RO,Broiler branches, Feed Mill, Hatchery	Covid-19 precautionary safety measures	11	0	11		111
			Total	124	0	124		164.5

	1) Training	35	109	144		161.5
	2) Training / Webinar	124		0124		164.5
	Total	159	109	268		0326



Training details provided in this report are for the month of May 21 alone. Training details for other months is attached as a separate PPT.

Conducting of Mock Drills are being carried out recently at various facilities which includes fire- fighting and rescue, Injury and rescue, First Aid, etc.

Example of one such event : Rescuing Technique incase if there is an accident in the silo Section and the photos of the drill are attached as under :



SUGUNA
FOODS



SUGUNA
FOODS

Emergency Evacuation Mock :



I. Significant Environmental and Social Events

[Redacted]

II. Occupational Health and Safety

Occupational Health and Safety Requirements and Monitoring

1. This reporting Period - From April to September 2021- There was lockdown in May & June

2. Reporting Period 1 year ago (not cumulative) - Lockdown was existing

	This reporting period		Reporting period- 1 year ago (not cumulative)		Reporting period- 2 years ago (not cumulative)	
Report TOTAL numbers for each parameter	Company employees	Contractor employees	Company employees	Contractor employees	Company employees	Contractor employees
New occupational injury cases	NIL	05	-	-	-	-
Total number of lost time occupational injuries	NIL	NIL	-	-	-	-
Total number of lost workdays due to injuries	NIL	NIL	-	-	-	-
Incidence rate of cases of occupational injury	NIL	NIL	-	-	-	-
Lost time injury frequency	0	0	-	-	-	-
Injury severity rate	0	0	-	-	-	-
Fatalities	[Redacted]					
Vehicle collisions	0	0	-	-	-	-

05 of the occupational injuries resulted from temporary back pain and joint pain when the labours were lifting the 50 kg bags. Training has been provided through our regional safety executives for manual handling operations including taking frequent breaks and avoid hunching or bending in an improper way to reach to materials. Volini sprays are being provided for relief to workers suffering back and joint pain. Automatic loading machines with conveyor belts have also been provided at various units.

[Redacted]

*Suguna Family support Fund is a unique initiative by the group to support the family of the deceased employee where all the employees of Suguna group and management provide a fund to the tune of Rs 0.08 Cr to the family.

[COMMUNITY Health and Safety

Community Health and Safety Requirements, Response and Reporting

We confirm no major community health and safety aspects that require monitoring during construction and/or operation as majority of our facilities are located in remote locations.

III. Social Safeguards and Community Engagement

Land Acquisition and Involuntary Resettlement

We confirm that the emergency loan proceeds were not used in any land acquisition and involuntary resettlement, including financing for contract farmers and service providers/suppliers.

Indigenous Peoples, Ethnic Minority Communities and Vulnerable Groups

We confirm that the emergency loan proceeds were not used in any activity that directly or indirectly affect indigenous peoples or ethnic minority communities, including financing for contract farmers and service providers/suppliers.

Stakeholder Engagement

Described below are the public engagements and engagements with contract farmers conducted during the reporting period.

Public Engagements: Initiative towards Education:

Infra Structural support to Primary & Government schools in villages near our Poultry farms.

Education aids the development of an individual's cognitive, psychological and intellectual faculties that ultimately shapes his or her personality. To create a comfortable learning environment for the under privileged students, the necessary support is provided to the Primary and Government schools to develop the necessary infrastructure which in turn would make the students learn comfortably (donated tables, benches, desks & notebooks).

To create a better infrastructure and an atmosphere conducive for the school staff to work, this Programme provides infra structural support to government schools – desks, chairs, tables & cupboards



Initiative towards Environment:



Ensuring Environmental Sustainability and Ecological Balance

To create awareness among School children on the importance of making our environment green and to increase the green cover, tree saplings were distributed to school children. Also to enhance the environmental awareness levels in the community, tree saplings were distributed to the villagers and to our Broiler farmers.

Greenery Project is undertaken at various facilities of Suguna Foods across the country which actively engages employees of the unit to develop green belt in and around their units by plantation of saplings.

More than 1000 saplings have been planted as a result of the greenery project initiative to increase the green cover. The project is being monitored on regular basis for improving the scope of plantation.

Detailed presentation on the greenery project undertaken at various facilities of Suguna.

Initiative towards Public Health & Sanitation:

PROMOTING HEALTH CARE & SANITATION



Majority of the schools in villages are without proper access to safe drinking water. Considering the importance of providing pure drinking water to the school children where the facilities are not there, drinking water Purifiers were provided.

To inculcate good health & hygiene habits among the students, especially for girl students to maintain good hygiene, coin operated Sanitary napkin vending machines along with napkins stock for 6 months to Government Schools.

To eradicate malnutrition for the economically backward children and for those who cannot afford nutritious food, Milk and Table eggs were provided - to Orphanages and Primary schools near our farms.

To fight against COVID-19, and to prevent from getting affected, face masks and sanitizers were provided to School Children, School Staff members, Villagers and to Primary Health Centres. Awareness of using face mask and sanitizers during the pandemic was also carried out in schools and villages.

Supporting health care infrastructure - Considering the dire need for oxygen supplies for Covid patients due to the short supply of Oxygen cylinders which affected severely in many hospitals, Oxygen Generation Plant and Oxygen cylinders were provided to Government Hospitals.

Farmer Engagement Program :

- a) Suguna has partnered with close to 36000 farmers for FY 2021 and the current number is 40000.

Suguna's support to Farmers in building climate resilience



Suguna partners with Farmers through Contract Broiler Farming.

- Supplies Chick, Feed and Health care products to contract Farmers.
- Provides Technical service to Farmers on day-to-day basis.
- Pays stable growing charges for the services provided by Farmers.
- Absorbs price fluctuation of inputs and selling price of Live bird.

Thus, protecting Farmers from vulnerabilities and ensures a stable income.



Skill Development by Suguna



- Provides Farmers training in farm management practices for efficient production.
- Provides Farmers training in handling of the live stocks while rearing them.
- Provides Farmers training in seasonal management (Winter, Summer and Rainy).
- Encourages rural entrepreneurs to take up poultry farming as a main activity.
- Ensures the reduction of unemployment among next generation rural youth.



Suguna's role in financial inclusion and literacy among Farmers



- Indian Commercial Banks have "Farmer Funding Products" customized for Contract Farmers of Suguna.
- Funding arrangements are provided for construction of Broiler Sheds/Houses and purchase of Poultry Farm equipment.
- Based on this initial relationship of Farmers with Bankers and satisfactory conduct, further credit facilities are availed by the Farmers. Such as Tractor loan, Housing Loan etc.,

Suguna eradicates poverty, generates employment and financial independence among the small holder Farmers. Thus, energizing the rural India.

Apart from the above Suguna coordinates with Indian Scheduled banks for helping contract farmers by arranging farmer Bank meetings where the prospective contract farmers could interact with Bank officials for securing loans for taking care of their infrastructure expenses.

Best performing farmers are felicitated during the farmer meet. Knowledge sharing happens amongst farmers to know about best farming practices.

Grievance Redress

[Please list any effective grievance or dispute (including court action), including environmental (e.g., health and safety) complaints received during the reporting period. Describe how these were addressed and their status.]

There have been some minor complaints related to health and safety aspects in construction sites, in which workers have complained about the dust problems due to movement of heavy vehicles. To sort out the issue meetings were held with the construction manager, and it was decided to sprinkle water every 3 hours with the help of a water tanker, to suppress the dust, what the workers were facing at the construction site.

IV. Labor

Compliance with National Laws and Internationally Recognized Core Labor Standards

We confirm that Suguna and its stakeholders comply with Applicable labor laws and take measures to comply with internationally recognized applicable core labor standards.

Human Resource Policy and Procedures

We have a comprehensive human resource policy, which is accessible through the employee portal. This is updated on a regular basis. Detailed table of content of the policy have been furnished below for your ready reference :

HR Policy Table of Contents

Vision, Mission, Core Values
Organization Levels and Designation
Recruitment and Onboarding
Trainee / Intern
Performance Development Dialogue
Annual Performance Bonus
Learning and Development
Attendance and Leave Management
Travel Management
Over Time
Mobile and Laptops
Transfers, Job Rotation and Deputations
Employee Career Progression
Employee Welfare
Ethics and Compliances
Exit Management

Internal Grievance Redressal

We also have a robust mechanism for addressing grievances at various levels and sublevels. Apart from that we have a whistle blower policy, all communications under the whistle blower mechanism are directed to the top management. (MD & ED).

Complaints received under the redressal mechanism have been resolved in a time bound manner.

[Redacted]

Type of Site	Total Number of People Working per Type of Site	Direct Employees			Contractual Workers/Laborer		
		Total	Male	Female	Total	Male	Female
GP Farms	183	183	161	22	0	0	0
Breeder Farms	773	773	767	6	168	168	0

Hatcheries	483	483	480	3	381	316	65
Feed Mills	1449	1449	1444	5	987	974	13
Processing Plants	154	154	146	8	459	324	135
Pre-mix Plants	24	24	24		0	0	0
Other operations (including corporate office)	4630	4630	4572	58	232	187	45
Total	7696	7696	7594	102	2227	1969	258

Gaps and Corrective Measures

[Initial Corrective Action Plan (CAP) – *please update progress of initial CAP implementation.*][Subsequent CAP - *please attach corrective action plan(s) from independent audit for*

Ref (to ADB CAPAEX loan CAP)	Corrective Action	Deliverable(s)	Timeline	Progress in the reporting period
1	Develop a formal environmental and social management system (ESMS) satisfactory to ADB. This ESMS will ensure compliance with applicable local regulatory requirements relevant across life cycle of the subprojects, ADB Safeguards Policy Statement (2009) (ADB SPS) and other lender's requirements (hereinafter referred to as 'Applicable Standards'). The ESMS shall provide an overarching framework for the sub-projects' environmental and social (E&S) management and shall include, as	An ESMS that meets ADB SPS requirements. This shall include the ESMS manual and associated Standard Operation Procedures (SOPs), E&S Policy, E&S organisation chart, legal and other requirements register, impacts	Adopt ESMS satisfactory to ADB submitted 6 months after third disbursement .	ESMS policy manual is under vetting with safeguards team. Post which Annexures with SOPs and E & S Policy shall be finalised before phased implementation by AECOM.

Ref (to CAPAEX CAP)	ADB loan	Corrective Action	Deliverable(s)	Timeline	Progress in the reporting period
		<p>minimum the following components:</p> <ul style="list-style-type: none"> • Environment and social policy; • Human resources and labour policies; • Environmental and social organization, roles and responsibilities; • Screening of projects/expansions against: (i) ADB Prohibited Investment Activities List (PIAL); (ii) Category A for environment, (iii) Category A and B for IR and IP • Assessment and categorization of project for environment, involuntary resettlement (IR) and Indigenous Peoples (IP) impacts per ADB SPS; • Regulatory and other applicable requirements identification and compliance assurance; • Environmental, health, safety (EHS) and social risks and impacts assessment and management; • EHS and social monitoring and reporting; • Training and capacity development; • Contractor management; • Contract farmers management; • Supply chain management; 	<p>and risks register, training plan, EHS and social monitoring plan, grievance redress mechanisms for employees and external parties.</p>		

Ref (to CAPAEX CAP)	ADB loan	Corrective Action	Deliverable(s)	Timeline	Progress in the reporting period
		<ul style="list-style-type: none"> Stakeholders engagement, information disclosure and community relations; and Grievance redress mechanisms. 			
1.2		Environmental and social organisation and capacity building: <ul style="list-style-type: none"> Recruit a senior E&S manager with formal education and sufficient E&S work experience on national and international requirements to lead, oversee and implement ESMS at corporate level. S/he will report directly to top management. A formal EHS committee (with representations from HR, Projects, Health, Supply Chain Management, Logistics, Legal, etc.) be established at the corporate level to review EHS aspects throughout the project cycle Develop and implement EHS training program at corporate and sub-projects 	(1) Recruit new qualified senior E&S manager (2) Appointment of EHS committee (3) Develop E&S training plan	1 and 2 by second disbursement 3 by third disbursement	1) Completed. Shri Kunal Ranjan Gupta , Senior E & S Manager has been recruited. 2) Completed. 5 member EHS committee containing representatives from various functions like projects, SCM, Law, Finance and HSR as since been formulated.
1.3		Compliance Assurance enhancement and supervision: <ul style="list-style-type: none"> Develop compliance register (e.g. permits and approvals and monitoring required) for selected facility types Conduct independent annual 	(1) Compliance registers (2) Independent audit reports (3) Compliance statements	1.By third disbursement 2.First audit report by 12 months after first disbursement	We are working with AECOM for completion of audit for 2 of our locations and the report shall

Ref (to CAPAEX CAP)	ADB loan	Corrective Action	Deliverable(s)	Timeline	Progress in the reporting period
		<p>corporate audit of CAP implementation against Applicable Standards. (The 6-monthly audit of the CAPEX loan can satisfy this annual audit requirement)</p> <ul style="list-style-type: none"> • Submit annual compliance statement to ADB 		3. First compliance statement submitted by 12 months after first disbursement	be submitted on or before April 2022.
2		Prepare and implement waste register for selected facility types indicating collection, treatment and disposal methods and destinations. Maintain waste collection and disposal records.	Waste registers	Prior to third disbursement	Annexures with SOPs for waste management to be finalised before phased implementation. However, we are having registered vendors for disposal of waste.
3.1a		Develop and implement Occupational Health and Safety (OHS) risk register, enhance management measures on identified risks and develop monitoring templates for selected facility types	<p>OHS risk register</p> <p>Enhanced corporate OHS management documents</p> <p>OHS monitoring templates</p>	Prior to third disbursement	Annexures with SOPs for OHS is to be prepared by AECOM, which is under process.
3.3		Ensure compliance with national labour laws and with Core Labor Standards (CLS): no child labour or forced labour; non-discrimination; equal opportunity; equal payment and allows for freedom of	(1) Compliance certificate confirming compliance with national labor laws	<p>1. Prior to third disbursement</p> <p>2. One year after first</p>	We are working with AECOM for completion of audit for 2 of

Ref (to CAPAEX CAP)	ADB loan	Corrective Action	Deliverable(s)	Timeline	Progress in the reporting period
		association. Conduct independent labour audit satisfactory to ADB. Scope, terms of reference and deliverables of the labour audit will be approved by ADB.	and with CLS (2) Independent labour audit	disbursement	our locations and the report shall be submitted on or before April 2022.
3.5		<p>Biosecurity - Enhance bio-security plan/protocol for the poultry operation that control animals, feed, equipment, and personnel, entering bird facilities as stipulated under the General Guidelines for Biosecurity at Central Poultry Development Organization (developed by Department of Animal Husbandry, Dairying & Fisheries, Ministry of Agriculture and Farmers' Welfare, Government of India, 2015</p> <p>Establish a corporate biosecurity team to ensure proper implementation of bio- security measures.</p>	Bio-security plan/protocol including all requirements to be endorsed by ADB.	Six months after third disbursement	<p>We have bio security plan/protocol for operations of all our poultry infrastructure like Hatchery, Farms etc., for monitoring the entry of men and materials into facilities.</p> <p>We have a dedicated team headed by GM, Health who formulates policies and is responsible for implementation and monitoring biosecurity measures across all the facilities.</p>

EHS COMMITTEE :



05.05.2021

To

Catalyst Trusteeship Limited
Office No. 604, 6th floor,
Windsor, C.S.T. Road,
Kalina, Santacruz (East),
Mumbai 400098

Environmental, Health, Safety (EHS) committee

S. No	Name & Designation	Dept
1	Mr. Jai Prakash, General Manager	Project
2	Mr. Ravichandran, Deputy General Manager	SCM
3	Mr. P.R. Srinivas, General Manager	Accounts & Taxation
4	Mr. C.P. Sekar, Deputy General Manager	Legal
5	Mr. S. Nagappan, Deputy General Manager	HR

For Suguna Foods Private Limited

A handwritten signature in black ink, appearing to be 'P.R. Srinivas', is written over the printed name.

P.R. Srinivas
General Manager (Accounts & Taxation)