



EverEnviro Resource Management Private Limited

Part 1

Environmental, Social & Governance

Policy

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EVERENVIRO RESOURCE MANAGEMENT PRIVATE LIMITED

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Preamble

The system for integrating environmental, social & governance (ESG) aspects in EverEnviro Resource Management Private Limited's (ERMPL) business operations has been developed in two parts:

- *Part I: Environmental, Social & Governance Policy*
- *Part II: Environmental, Social & Governance Management System*

The ESG Policy document presents the Environmental, Social & Governance (ESG) commitments of ERMPL through a Policy Statement and supporting Operational Principles. The Policy document states ERMPL's intentions on ESG aspects of the business and can be circulated with ERMPL's stakeholders.

The Environmental & Social Management System (ESMS) Manual presented as Part II of the documentation has been developed to enable operationalization of the ESG Policy and Operational Principles of ERMPL. The ESMS Manual presents the operational procedures to be adopted by ERMPL. The ESMS Manual is an operational level document, that may need to be adapted in future and will remain internal to the company.

Table of Contents

1	Introduction	5
1.1	About EverEnviro Resource Management Private Limited	5
1.2	Statement of Purpose and Scope	5
1.3	Reference Framework.....	5
2	ESG Policy & Principles	8
2.1	ESG Policy.....	8
2.2	Supporting Policies and Management Systems.....	9
2.3	E&S Operational Principles	9
2.3.1	Excluded Activities	10
2.3.2	Compliance to E&S Legal Requirements.....	10
2.3.3	Good and Safe Working Conditions	10
2.3.4	Pollution Prevention, Resource Security, and Inclusive Circular Economy.....	10
2.3.5	Climate Sensitive Practices	10
2.3.6	Stakeholder Engagement.....	11
2.3.7	Community Health, Safety and Security	11
2.3.8	Continual Improvement in E&S Performance.....	11
2.3.9	ESG disclosures	11
3	Approval, Communication, Implementation & Update of ESG Policy	12
3.1	Approval.....	12
3.2	Communication.....	12
3.3	Implementation	12
3.4	Review and Update	12
	Annex 1: ERMPL'S E&S Exclusion List.....	13

Abbreviations

CBG	Compressed Biogas
CNG	Compressed Natural Gas
CSR	Corporate Social Responsibility
C&D	Construction and Demolition
DFID	Department for International Development
EHS	Environment, Health, and Safety
ERMPL	EverEnviro Resource Management Private Limited
ESG	Environmental, Social, and Governance
ESGMS	Environmental, Social, and Governance Management System
ESMS	Environmental & Social Management System
ESM	Environmental and Social Management
ESS	Environmental and Social Standards
E&S	Environmental and Social
FCDO	Foreign, Commonwealth and Development Office
FMO	Nederlandse Financierings-Maatschappij voor Ontwikkelingslanden N.V.
GCF	Green Climate Fund
GGEF	Green Growth Equity Fund
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
IFC	International Finance Corporation
MT	Metric Ton
NDC	Intended Nationally Determined Contribution
NIIF	National Investment and Infrastructure Fund
SBM	Swachh Bharat Mission
SDG	Sustainable Development Goal

1 Introduction

1.1 About EverEnviro Resource Management Private Limited

EverEnviro Resource Management Private Limited (ERMPL) is a 100% subsidiary of Green Growth Equity Fund (GGEF) that has anchor investment from National Investment & Infrastructure Fund (NIIF), Government of India and Foreign, Commonwealth & Development Office (FCDO), Government of United Kingdom.

ERMPL is a rapidly growing waste management company with pan India footprint, providing end to end solutions for sustainable management of various types of wastes covering but not limited to municipal solid waste (MSW), agricultural waste and residues, construction & demolition waste, and industrial waste. The company focuses on delivering services through implementation of state-of-the-art technologies across the waste management value chain that helps in prevention of pollution while contributing to the climate change mitigation and supporting India's Nationally Determined Contribution (NDC) under the Paris Agreement. The company operations also contribute to the Government of India's flagship Swachh Bharat Mission (SBM).

1.2 Statement of Purpose and Scope

As a responsible business, ERMPL seeks to be a leader in the sustainable management of waste and be a contributor to circular economy by ensuring utilization of waste as a resource wherever possible through its business operations. While the overall outcome of the ERMPL businesses make positive contributions to national objectives and missions, it recognises that the business operations that it invests and develops can have the potential to cause adverse Environmental and Social (E&S) impacts. The adverse impacts, if left unaddressed, could lead to legal, reputational, and financial risks to the company and negatively impact employees, workers, communities, and other affected stakeholders. ERMPL, therefore, aims to identify the E&S risks and work towards managing and mitigating such risks should they materialize and maximize the value created around the opportunities emerging from the E&S focus.

Through this ESG Policy, ERMPL expresses its commitment to continue to be a responsible business that integrates ESG considerations in its business operations including its investment decisions. The ESG policy will be applicable to all existing companies and to potential investments considered by ERMPL. The Company will also screen all potential investments for the ESG risks. For the ESG risks identified, both for existing investment and future investments, the Company will identify and implement mitigative measures for risk reduction and continually measure their effectiveness.

1.3 Reference Framework

The ESG Policy for ERMPL has been developed with reference to the following frameworks:

- Applicable national and local environmental and social (including occupational health and safety) related laws and regulations
- Good International Industry Practice (GIIP) requirements as applicable from the ESGMS requirements of GGEF (developed by EverSource)¹ that include:
 - IFC Performance Standards, [2012](#)
 - The World Bank Group General Environmental, Health and Safety (EHS) Guidelines, ([2007](#)) and relevant World Bank Group Industry Sector EHS Guidelines
 - Department of International Development (DFID) Toolkit on ESG for Fund Managers ([2010](#))
 - ESM Policy Framework of National Investment and Infrastructure Fund (NIIF) comprising of E&S Policy, E&S Exclusion List and E&S Management Principles ([2018](#))
 - Green Climate Fund's (GCF) environmental and social framework including E&S Policy ([2021](#)), Indigenous Peoples Policy ([2018](#)), Gender Policy ([2019](#)), Information Disclosure Policy ([2016](#)) and Interim E&S Safeguards ("ESS") ([2014](#))
 - FMO Sustainability Policy ([2016](#))
 - United Nations Guiding Principles on Business and Human Rights ([2011](#))
 - The United Nations Sustainable Development Goals (UN SDGs) ([2015](#))
 - BII's Fossil Fuel Policy ([2020](#))

ERMPL is cognizant of the fact that as a responsible business it needs to contribute to the United Nations Sustainable Development Goals (SDGs). While multiple SDGs have interface with the businesses and operations of ERMPL, specifically it aspires to contribute to the following SDGs:

- SDG 3: Good health and Wellbeing;
- SDG 7: Affordable and clean energy;
- SDG 8: Decent work and economic growth;
- SDG 9: Industry, Innovation, and Infrastructure;
- SDG 11: Sustainable cities and communities;
- SDG 12: Sustainable consumption and production;
- SDG 13: Climate Action.

The impact indicators identified in line with these SDGs has been set out as a framework to measure the impact created through the businesses operated by Company.

The key ESG aspects applicable to ERMPL's ESMS are presented in Error! Reference source not found..

¹ https://www.eversourcecapital.com/app/uploads/2020/11/201105-ESG-Policy-ESGMS_GGEF_FINAL.pdf

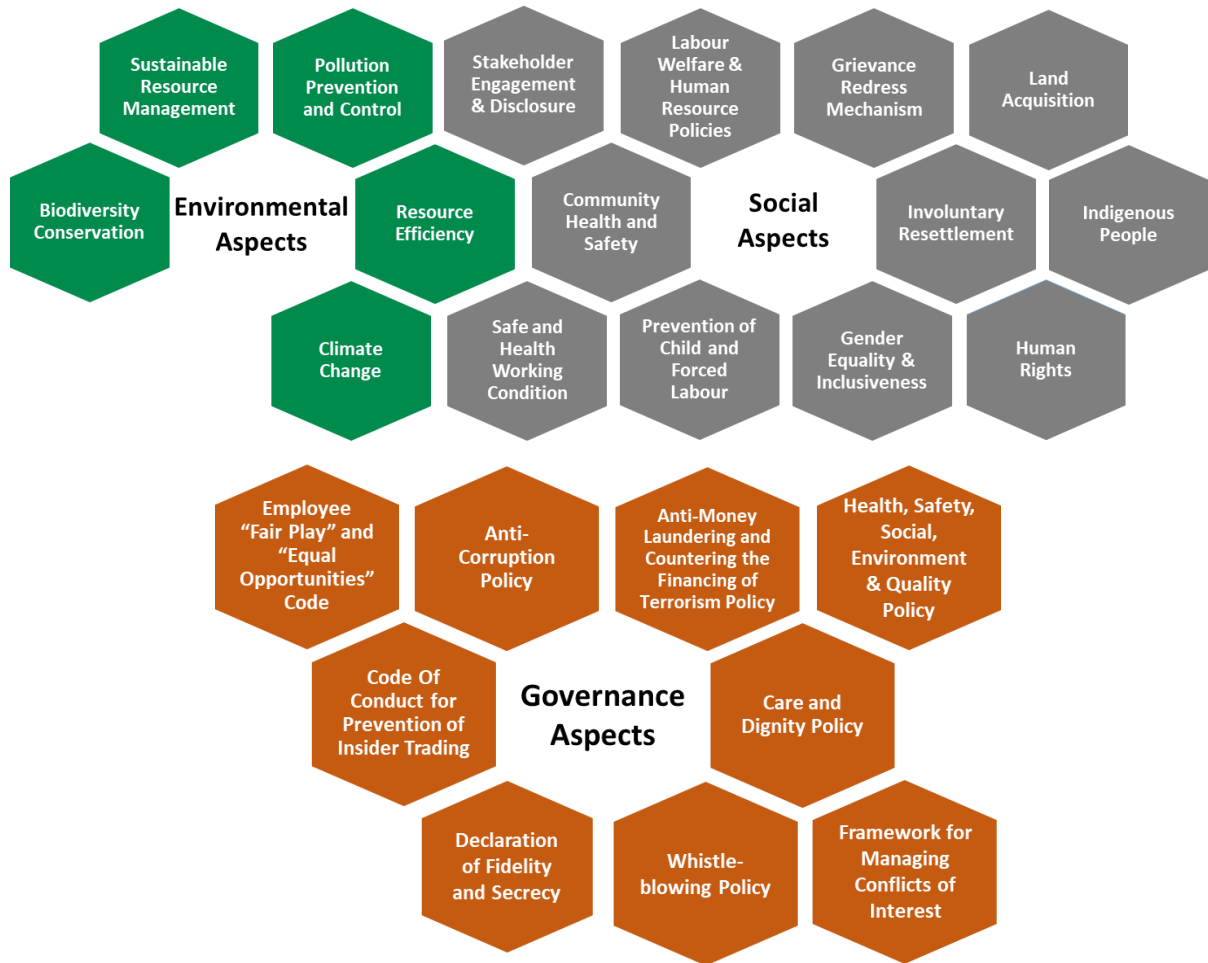


Figure 1-1: ESG Aspects as drawn from the Reference Framework

2 ESG Policy & Principles

2.1 ESG Policy

ERMPL endeavours to become a responsible waste management company and is committed to prevent or minimize (mitigate) the adverse impacts of the operations undertaken by the business through implementation of GIIP and providing environmentally sound, socially acceptable, and innovative solutions. The company has adopted the following ESG Policy:

EverEnviro Resource Management Private Limited's Environmental, Social & Governance Policy

EverEnviro Resource Management Private Limited (ERMPL) is a rapidly growing waste management company with pan India footprint, providing end to end solutions for sustainable management of various types of waste covering but not limited to municipal solid waste (MSW), agricultural waste and residues, construction & demolition waste, and industrial waste. Leveraging on technological advancement across the waste management value chain, ERMPL businesses are committed to make positive contributions.

ERMPL believes that environmental, social and governance (ESG) issues can influence investment risk and return and, therefore, incorporates ESG considerations throughout the business cycle to ensure compliance, lower risks, add value and enhance sustainability in all its business operations and projects. Towards these, ERMPL commits to:

- Not invest or operate any business that features in the excluded activity listed in ERMPL'S E&S Exclusion List;
- Ensure compliance with applicable Indian environmental and social legal requirements and standards on Governance on a proactive basis;
- Endeavour that the companies under the ERMPL go beyond compliance and provide good working conditions that are gender-responsive, safe, and healthy and that mechanisms are placed for timely and satisfactory redressal of grievances;
- Proactively promote resource conservation, enhancing resource use efficiency and resource recovery across the business operations;
- Require the companies under ERMPL to operate with integrity and the highest ethical standards through implementation of comprehensive governance structures and practices;
- Contribute to the achievement of the targets of the relevant United Nations Sustainable Development Goals (UNSDGs) having alignment to the ERMPL business operations and be in line with GGEF's investment themes and impact strategy
- Aim to ensure that the companies under the ERMPL abide by the ERMPL's ESG policy and Principles.

The conformity to the policy commitments will be met through the implementation of an ESMS aligned to the commitments that will further ensure ESG risk management across the lifecycle of all business investments being made.

2.2 Supporting Policies and Management Systems

ERMPL has developed other policies to demonstrate its commitment for good corporate governance in its business operations. These policies include the following:

- Health, Safety, Social, Environment & Quality (HSSEQ) Policy
- Anti-Corruption Policy
- Anti-Money Laundering and Countering the Financing of Terrorism Policy
- Care and Dignity Policy
- Code Of Conduct for Prevention of Insider Trading
- Declaration of Fidelity and Secrecy
- Employee “Fair Play” and “Equal Opportunities” Code
- EverEnviro’s Care and Dignity Policy for protection against sexual harassment at workplace
- Framework for Managing Conflicts of Interest
- Whistleblowing Policy

The above-mentioned policies are available on request.

ERMPL has developed an Integrated Management System (IMS) that meets the requirements stated under the international standards ISO 9001:2015 (for Quality), ISO 14001:2015 (for Environment) and ISO 45001:2018 (for Occupational Health & Safety). The IMS is designed for the business operations of the companies under ERMPL and expresses its commitment to improvement in operations and mitigation of risks emanating from them. This IMS compliments the ESMS in managing risks during operations.

2.3 E&S Operational Principles

The ESG Policy of ERMPL is supported by the following E&S Operational Principles. These operational Principles will apply to all ERMPL’s business operations and guide the subsidiary companies. A snapshot of the E&S Operational Principles is presented in **Figure 2-1**.



Figure 2-1: E&S Operational Principles

2.3.1 Excluded Activities

- ERMPL will not invest or operate any business that that features in the excluded activity listed in ERMPL'S E&S Exclusion List (presented in **Annex 1**). ERMPL'S E&S Exclusion List is aligned to the exclusion list of GGEF's ESGMS.

2.3.2 Compliance to E&S Legal Requirements

- ERMPL will assess compliance of business operations of its companies with all relevant Indian E&S (including labour, health, and safety) policies and legislative requirements and regulations applicable to ecologically sensitive areas and those for land acquisition, resettlement, and rehabilitation.

2.3.3 Good and Safe Working Conditions

Ensure within its business operations, following practices:

- Providing safe workplaces and mitigating adverse occupational health and safety related risks.
- Preventing sexual harassment in all forms especially of women and establish policy and procedures for the same.
 - Treating all workers fairly in terms of recruitment, remuneration and progression irrespective of gender, race, colour, language, disability, political opinion, age, religion, or national/social origin.
- Providing an opportunity to the workers to present their views to the management through consultations.
- Preventing employment of forced or child labour.
- Providing training, communication, and tools to workers, as appropriate, to ensure good and safe working conditions.

Note: Workers include workers directly engaged as well as contracted workers engaged through third parties.

2.3.4 Pollution Prevention, Resource Security, and Inclusive Circular Economy

Encourage within its business operations, following practices such as:

- Adoption of appropriate controls, including processes and procedures to manage pollution generated in the form of air emissions; wastewater generation; and solid waste generation through treatment or disposal in an environmentally sound manner to comply with the applicable regulations.
- Identification of opportunities to reuse, recycle and recover resources from the wastes streams to reduce consumption of virgin resources and improve resource security

2.3.5 Climate Sensitive Practices

Encourage within its business operations, following practices such as:

- Reduction of material and energy inputs, use of local materials and avoid long transportation of material and use cleaner fuels,
- Carry out climate proofing of its assets to address vulnerability in response to climate change.

2.3.6 Stakeholder Engagement

- Engage with relevant stakeholders at appropriate stages of business operations with due consideration to the disadvantaged and the vulnerable stakeholders.
- Communicate the ESG Policy and underlying procedures (as relevant) to all stakeholders through the company website and other appropriate mechanisms.
- Provide fair, transparent, and timely redress of grievance (internal and external) reported in written or verbal format by affected stakeholders.
- Establish feedback mechanisms and utilize it for improvement in the ESMS.

2.3.7 Community Health, Safety and Security

Encourage within its business operations, following practices:

- Avoiding or minimizing the impact on water quality and availability for the community.
- Avoiding or minimizing the potential for community exposure to air pollution and odours.
- Avoiding or minimizing the potential for community exposure to hazardous materials and wastes.
- Ensuring structural safety, life, and fire safety aspects in projects.
- Providing good working conditions that are inclusive, gender-responsive, safe, and healthy for work
- Assessing and managing traffic-related risks and impacts during construction activities.
- Assessing and mitigating risks posed by the security arrangements to those within and outside the business operations.

2.3.8 Continual Improvement in E&S Performance

ERMPL has established, implements, and maintains systems to manage ESG risks and opportunities and has developed procedures for periodic monitoring. Based on the results of monitoring and reporting, if non-compliances are observed, then the same will be corrected proactively. Measures to improve the ESG performance in terms of value add or opportunities will also be identified.

2.3.9 ESG disclosures

ERMPL will compile ESG information comprising of environmental, social and governance aspects and share with the Investors about its ESG performance, integration of ESG matter to the business processes and the progress made.

All serious ESG incidents will be recorded, investigated, and reported to relevant stakeholders including the investors.

3 Approval, Communication, Implementation & Update of ESG Policy

3.1 Approval

The ESG Policy will be formally approved and adopted by the Board of Directors at ERMPL. The ESG Policy will be applicable to all business operations and projects of the Company from the date of approval.

3.2 Communication

The ESG Policy will be communicated to all employees through suitable awareness programs and communicated to other stakeholders, such as investors, project partners, as relevant. The ESG Policy may also be disclosed through ERMPL's website.

3.3 Implementation

The ESG Policy and Principles are supported by the Environmental & Social Management System (ESMS) Manual. The ESMS Manual is formally adopted by ERMPL and will be implemented in all business operations of the company.

Under the ESMS Manual, procedures and tools for identification of E&S risks and opportunities and their management and monitoring are developed. E&S risk appraisal process for new business investments are also included in the ESMS Manual. The institutional structure with roles and responsibilities of various departments towards implementation of the ESMS is defined. Accordingly, training programs will be conducted on a regular basis and qualified and competent staff will be appointed at ERMPL and its companies.

3.4 Review and Update

The ESG Policy will be reviewed once every three years or as recommended by the Board and updated if required, to ensure its effectiveness, adequacy, and suitability to the changing scenarios of environmental, social and governance aspects and the business canvas.

Where a need for revision in the ESG Policy is realized, the revised policy documents will be placed before the Board for approval before implementation of revisions.

Annex 1: ERMPL'S E&S Exclusion List

ERMPL will not invest in any of the following activities (1)²:

- 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 wastes³;
 - ozone depleting substances⁴;
 - wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora⁵;
 - unsustainable fishing methods⁶;
 - transboundary trade in waste or waste products⁷;
- Production of or trade in arms (i.e., weapons, ammunitions, or nuclear products, primarily designated for military purposes, including paramilitary material) *;
- Commercial logging operations or the purchase of logging equipment for use in primary tropical moist forest or old-growth forests;
- Production or trade in wood or other forestry products other than from sustainably managed forests;
- Destruction⁸ of High Conservation Value areas⁹
- Production or activities involving harmful or exploitative forms of forced labour¹⁰ and child labour¹¹;
- Production of, use of, or trade in, unbounded asbestos fibres¹²;

² IFC's project exclusion list

(http://www.ifc.org/wps/wcm/connect/corp_ext_content/ifc_external_corporate_site/ifc+projects+database/projects/aip+s+added+value/ifc_project_exclusion_list).

³ 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

⁴ 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

⁵ As specified in the 1975 Convention on International Trade in Endangered Species or Wild Flora and Fauna ("CITES"), see www.cites.org, as may be amended from time to time

⁶ These will include such as 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.

⁷ As defined by the Basel Convention; see <http://www.basel.int>

⁸ 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

⁹ 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>).

¹⁰ Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty

¹¹ 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).

¹² This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%

- Production of or trade in alcoholic beverages (excluding beer and wine) *;
- Production of or trade in radioactive materials¹³;
- Racist and/or anti-democratic media
- Any businesses if any of the following activities represents a substantial portion of such business¹⁴:
 - Gambling, gaming casinos and equivalent enterprises*;
 - Production of or trade in Tobacco or tobacco related products *¹⁵; or
 - Pornography;
- Fossil fuel sub-sectors¹⁶ comprising of upstream activities (exploration and production of fossil fuels); midstream (transportation and storage of raw fossil fuels); downstream (refining and distribution of refined fossil fuels); and power generation (defined as grid-connected rather than in captive capacity).

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.

¹³ 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

¹⁴ 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.

¹⁵ Except, in the case of tobacco production only, with an appropriate timeframe for phase out

(i) 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.

(ii) A list of pharmaceutical products subject to phaseouts or bans is available at <http://www.who.int>.

¹⁶ This does not include Stand-alone diesel generators, where demonstrated that the option of a renewable generator is technically or commercially not feasible. Also, use of LPG for cooking and heating are an accepted practice.



EverEnviro Resource Management Private Limited

Part II

Environmental, Social & Governance

System Manual

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Approved by	MD & CEO
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Preamble

The system for integrating environmental and social (E&S) aspects in EverEnviro Resource Management Private Limited's (ERMPL) business operations has been developed in two parts:

- **Part I** Environmental, Social and Governance Policy (ESG)
- **Part II** Environmental and Social Management System (ESMS)

The ESG Policy document presents the Environmental, Social & Governance (ESG) commitments of ERMPL through a Policy Statement and supporting Operational Principles. The Policy document states ERMPL's intentions on ESG aspects of the business and can be circulated with ERMPL's stakeholders.

The Environmental and Social Management System (ESMS) Manual presented in Part II of the documentation has been developed to enable operationalization of the ESG Policy and Operational Principles of ERMPL. The ESMS Manual includes the planning and the operational procedures to be adopted by ERMPL across the lifecycle of all projects to ensure E&S risks are managed. The lifecycle of all projects covers the decision-making process starting from the project bidding, post award of project, construction, operation, and closure stage. The ESMS is an operational level document and will remain internal to the company.

Disclaimer

This ESMS Manual is strictly controlled for any form of circulation and amendment. The hard “controlled copies” of either the ESMS manual or the procedures/tool/annexures shall be marked “Controlled copy”. The photocopies or the like of any of these controlled documents shall be treated as uncontrolled copies and shall not be covered under the documented management systems as defined in this ESMS manual. Only the latest revision number shall be valid for circulation and use. The HSSE Head shall control all amendments, revisions, issues, and circulation of this ESMS manual. “Controlled copies” may also be accessible through the computer network or other electronic media.

All the procedures referred to in this manual have been approved by the Top Management or by the concerned authorized person for use and system implementation.

Table of Contents

1	Introduction	8
1.1	Background	8
1.2	Objective and Scope of the ESMS	8
1.3	Applicability and Implementation.....	9
1.4	Structure of the ESMS	9
2	Overview of EverEnviro Resource Management Pvt. Ltd.	10
2.1	About ERMPL	10
2.2	Business Segments of ERMPL	10
2.3	Organizational Structure.....	11
3	Reference Framework for the ESMS	12
3.1	Indian Legal Requirements	12
3.2	Institutional Investor Safeguards	13
4	Management of E&S Risks for New Projects	14
4.1	Project Bidding.....	14
4.1.1	Bidding Process	14
4.1.2	E&S Integration in the Bidding Process.....	15
4.1.3	Bidding Decision.....	16
4.1.4	E&S Risk Mitigation Post Award of Project.....	16
4.2	Direct Nomination.....	16
4.3	Mergers & Acquisition	17
4.4	E&S Risk Assessment for Business Expansion.....	17
4.4.1	E&S Screening	17
4.4.2	Environmental, Social and Safety (ESS) Screening.....	17
4.4.3	Preliminary E&S Risk Assessment	18
4.4.4	Project Categorisation	19
4.4.5	E&S Review – ESDD & Additional Studies.....	20
4.4.5.1	E&S Due Diligence	20
4.4.5.2	Additional Studies	21
4.4.6	E&S Action Plan.....	21
5	Management of E&S Risks in Construction Projects	22
5.1	Environmental Risks.....	22
5.2	OHS Risks.....	23
5.3	Labour and Working Conditions Risks	24
5.4	Community Risk Evaluation	26
5.5	Management of E&S Risks in Construction Projects.....	27
5.5.1	Contractor EMP.....	28
6	Management of E&S Risks in Operational Plants	30

6.1	Environmental Risks.....	30
6.2	OHS Risks.....	31
6.3	Labour and Working Conditions Risks	32
6.4	Community Risk Evaluation	33
6.5	Management of EHS and Social Risks	34
7	E&S Monitoring and Review.....	42
7.1	E&S Monitoring of Plants.....	42
7.2	Monitoring of ESAP Implementation	42
7.3	E&S Reporting by Plants.....	42
7.4	Reporting of Serious Incidents/accidents.....	43
8	E&S Performance Reporting by ERMPL.....	44
8.1	Quarterly Reporting	44
8.2	Annual Reporting	44
9	Project Closure	45
9.1	E&S Risk Assessment in Project Closure	45
9.2	Decommissioning or Dismantling	45
10	Associated Frameworks	49
10.1	Stakeholder Engagement Framework.....	49
10.2	Grievance Handling and Redressal Framework	50
10.3	Emergency Preparedness and Response Framework.....	52
10.4	Resource Efficiency and Management Framework	53
10.5	Supply Chain Management Framework.....	53
11	Organizational Capacity and Competency.....	54
11.1	Institutional Arrangement for ESMS Implementation.....	54
11.2	Roles and Responsibilities under ESMS	55
11.2.1	MD & CEO.....	55
11.2.2	ESG Committee.....	55
11.2.3	HSSE Head	55
11.2.4	HSSE Team.....	56
11.2.5	Team Specific Responsibilities.....	56
11.2.6	Plant Head(s)	57
11.2.7	HSE In-charge(s)	57
11.3	Training and Capacity Building.....	58
11.3.1	Training Need Assessment	58
11.3.2	Induction and Refresher Trainings	59
11.3.3	Annual Training Calendar	60
11.3.4	Modes of Training	60
11.3.5	Toolbox Talks.....	60
11.3.6	Trainers.....	60
11.3.7	Training Records.....	61
12	ESMS Review.....	62

12.1	ESMS Implementation Audit	62
12.2	Management Review	62
13	Document Control	64
13.1	ESMS Controlled Documents	64
13.2	Update of ESMS	65

Abbreviations

AGM	Assistant General Manager
B&T	Bidding & Tendering
BD	Business Development
C&D	Construction & Demolition
C&T	Collection & Transport
CAPA	Corrective and Preventive Action
CBG	Bio CNG
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CNG	Compressed Natural Gas
COO	Chief Operation Officer
CRZ	Coastal Regulation Zone
CS	Company Secretary
CtE	Consent to Establish
DFID	Department of International Development
E&S	Environmental & Social
EAIR	Environmental Aspect Impact Register
EHS	Environment, Health, and Safety
EHSS	Environmental, Health & Safety and Social
EMP	Environmental & Social Management Plan
EMS	Environmental Management System
EPC	Engineering, Procurement and Construction
ERMPL	EverEnviro Resource Management Private Limited
ESAP	E&S Action Plan
ESDD	E&S Due Diligence
ESF	Environmental and Social Framework
ESG	Environmental, Social and Governance
ESIA	Environmental & Social Impact Assessment
ESMS	Environmental and Social Management System
F&A	Finance & Accounts
FCDO	Foreign, Commonwealth & Development Office
FI	Financial Institution
FoF	Fund of Funds
GCF	Green Climate Fund
GGEF	Green Growth Equity Fund
GHG	Green House Gas
GIIP	Good International Industry Practices
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
HIRAO	Hazard Identification and Risk Assessment with Identification of Opportunities
HOD	Head of Department
HR	Human Resources

HSE	Health, Safety and Environment
HSSE	Health, Safety, Security and Environment
IC	Investment Committee
IFC-PS	International Finance Corporation Performance Standards
IMS	Integrated Management System
IR	Industrial Relations
KPI	Key Performance Indicator
LWC	Labour and Working Conditions
LWCRR	Labour and Working Conditions Risk Register
MD	Managing Director
MDG	Millennium Development Goals
MSW	Municipal Solid Waste
NDC	Nationally Determined Contribution
NIIF	National Investment and Infrastructure Fund
OH & SMS	Occupational Health and Safety Management System
OHS	Occupational Health & Safety
OPEX	Operating Expenses
PE	Project Execution
PPE	Personal Protective Equipment
PPP	Public Private Partnership
QMS	Quality Management System
RDF	Refuse Derived Fuel
SBM	Swachh Bharat Mission
SCM	Supply Chain Management
SDGs	Sustainable Development Goals
SOP	Standard Operating Procedure
T-EPC	Turnkey Engineering, procurement, and construction
ToR	Terms of Reference
UNGPs	United Nations Guiding Principles
WB-EHS	World Bank Group's Environmental, Health and Safety Guidelines
WtE	Waste to Energy

1 Introduction

EverEnviro Resource Management Private Limited (“ERMPL”, “Company”) is a 100% subsidiary of Green Growth Equity Fund (GGEF) that has anchor investment from National Investment & Infrastructure Fund (NIIF), Government of India and Foreign, Commonwealth & Development Office (FCDO), Government of United Kingdom. With a pan India footprint, ERMPL provides end to end solutions for sustainable management of various types of wastes through implementation of state-of-the-art technologies.

1.1 Background

ERMPL understands the need to address environmental and social (E&S) risks that arise from its business operations in a structured manner and take measures at appropriate stages to manage the impacts arising from the risks. Towards this the Company has developed an Environmental and Social Management System (ESMS) to identify, assess, manage, and monitor the E&S risks and impacts giving due consideration to the Company’s nature and scale of the business activities.

The ESMS is guided by an Environmental, Social and Governance (ESG) Policy and has been benchmarked against the internationally accepted standards (refer to Section 3) including the International Financial Corporation (IFC) Performance Standards (PS) on Environmental and Social Sustainability, 2012. The ESMS integrates Environment and Social (E&S) risks identification and their management into ERMPL’s business operations and processes. The ESMS establishes a functional corporate-level management system to identify and manage E&S risks arising from the activities associated with the lifecycle of waste management facilities operated by the Company.

1.2 Objective and Scope of the ESMS

The ESMS has been developed to provide a framework at the corporate level that assists the Company in the identification, assessment, and management of environmental, health & safety and social risks and impacts associated with its waste processing business and put in place policies, plans, procedures, and institutional capacity to manage and monitor the same.

The envisaged Scope of the ESMS is as follows:

- Integrating ERMPL’s commitment to Environment, Social and Health & Safety performance expressed through the Corporate ESG Policies.
- Establishing procedures for screening, categorization, and assessment of environmental and social impacts of new projects, brownfield acquisitions or expansion of existing projects.
- Defining appropriate mitigation measures and risk management systems for management and minimization of impacts from the Company’s operations and activities, including those arising during construction activities.
- Establishing robust frameworks on emergency preparedness and response, stakeholder engagement, grievance handling and redressal, life and fire safety and resource efficiency & management procedures that are commensurate to the business operations of the Company.

- Setting up institutional arrangements at the corporate level and for plants of the Company (operating and upcoming) and provisioning of resources for the successful implementation of the ESMS along with a commitment for training and capacity building of these internal resources; and
- Establishing a reporting, monitoring, and auditing mechanism for assessment and review of ESMS implementation in order to make the system more efficient and effective.

1.3 Applicability and Implementation

ESMS will be applicable to all operating and upcoming waste management businesses owned / operated by ERMPL. All businesses will be required to manage E&S risks in line with ERMPL's ESMS. This document will be updated from time to time to capture new businesses or operations that ERMPL ventures into and address previously unseen E&S risks and impacts.

Implementation of this system is the responsibility of the ESG Committee as structured in Section 11.

1.4 Structure of the ESMS

The system for integrating environmental and social aspects in ERMPL's operations has been developed in two parts:

- **Part I:** Environmental, Social & Governance Policy
- **Part II:** Environmental & Social Management System

The above structure has been developed to make the system more dynamic. The ESG Policy document as Part I of the documentation presents the ESG Policy Statement of ERMPL. The Policy document states ERMPL's intentions on environmental and social aspects of the business and is subject to periodic updates.

The Environmental & Social Management System presented in Part II of the documentation has been developed to enable operationalization of the ESG Policy. The ESMS includes components specified in IFC Performance Standards 1 and ESGMS of GGEF. The requirements from the reference framework (see Section 3) have been suitably factored, in the design of the ESMS. The ESMS is an operational level document, which will remain dynamic in nature, and is internal to the Company.

This document is the Operational Manual (Part - II) and is supported by procedures, formats, and checklists which are adequately referenced in this document.

2 Overview of EverEnviro Resource Management Pvt. Ltd.

2.1 About ERMPL

EverEnviro Resource Management Private Limited (ERMPL) focuses on delivering waste management services through implementation of state-of-the-art technologies across the waste management value chain that helps in prevention of pollution while contributing to the climate change mitigation goals and supporting India's Nationally Determined Contribution (NDC) under the Paris Agreement.

EverEnviro aims to be a market leader in various types of waste management businesses such as municipal solid waste (MSW), agricultural waste and residues, construction & demolition (C&D) waste, and industrial waste with plans to implement leading waste management technologies and leverage the power of IoT and other Industry 4.0 technologies for increasing efficiencies.

2.2 Business Segments of ERMPL

The Company promotes environmentally sustainable solutions. ERMPL has successfully created a niche in the Waste Sector by innovating a viable waste processing business model. The Company has recently setup Asia's biggest and state-of-Art Technology 550 MT/ day capacity Bio-CNG (CBG) Project based on Organic Fraction of Municipal Solid Waste at Indore. It has set up and operates a 12 MW Waste to Energy Plant (WtE) under PPP model with East Delhi Municipal Corporation, which is the only Euro Emission Norm Compliant Waste to Energy Plant in India. In C&D Waste Management, it has been a pioneer. Currently, ERMPL is operating 3 C&D Waste Processing plants in Delhi under Public Private Partnership (PPP) with North Delhi Municipal Corporation, East Delhi Municipal Corporation and Delhi Metro Rail Corporation with a combined processing capacity of 3150 MT/day. The Company is on way to establish agro waste and press mud-based Bio-CNG Plants in Punjab and Uttar Pradesh. The operations of the Company are rapidly growing with newer plants being established including multiple business segments.

The business segments at ERMPL includes:

- Bio-CNG (CBG) & Organic Manure
 - Agro Waste - Paddy Straw
 - Industrial Agro Waste- Press Mud
 - Cattle Waste
 - Napier Grass etc.
- Construction & Demolition Waste Management
- Solid Waste Management
 - Waste to Energy
 - Compost & RDF
 - Collection & Transportation

2.3 Organizational Structure

ERMPL businesses are headed at the corporate level by the Managing Director and Chief Executive Officer (MD & CEO). The operational activities are headed by competent personnel with support from domain experts in their respective areas. Given the commitment to E&S aspects management, a **Health, Safety, Security and Environment (HSSE) Head** has been appointed at the corporate level who amongst other responsibilities also leads ESMS implementation across the company.

Figure 2-1 presents a broad level organogram with schematic representation of both corporate and plant level. Specific roles under this ESMS have been assigned to such personnel.

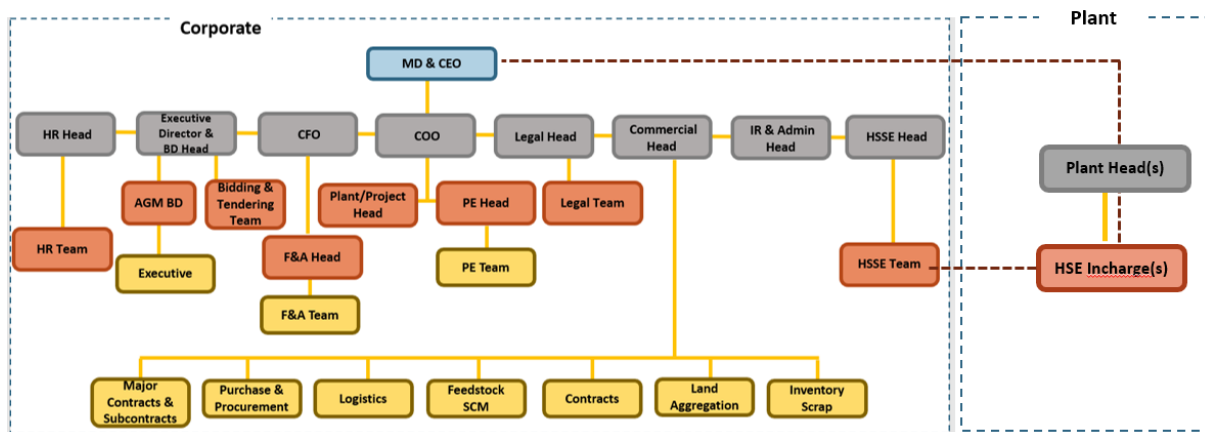


Figure 2-1: Institutional arrangement for ESMS implementation

3 Reference Framework for the ESMS

ERMPL will remain committed to benchmark its investments to the following requirements / frameworks:

- Applicable national and local environmental and social (including occupational health and safety) related laws and regulations
- Good International Industry Practice (GIIP) requirements as applicable from the ESGMS requirements of GGEF (developed by EverSource)¹ that include:
 - IFC Performance Standards, [2012](#)
 - The World Bank Group General Environmental, Health and Safety (EHS) Guidelines, ([2007](#)) and relevant World Bank Group Industry Sector EHS Guidelines
 - Department of International Development (DFID) Toolkit on ESG for Fund Managers ([2010](#))
 - ESM Policy Framework of National Investment and Infrastructure Fund (NIIF) comprising of E&S Policy, E&S Exclusion List and E&S Management Principles ([2018](#))
 - Green Climate Fund's (GCF) environmental and social framework including E&S Policy ([2021](#)), Indigenous Peoples Policy ([2018](#)), Gender Policy ([2019](#)), Information Disclosure Policy ([2016](#)) and Interim E&S Safeguards ("ESS") ([2014](#))
 - FMO Sustainability Policy ([2016](#))
 - United Nations Guiding Principles on Business and Human Rights ([2011](#))
 - The United Nations Sustainable Development Goals (UN SDGs) ([2015](#))
 - BII's Fossil Fuel Policy ([2020](#))

3.1 Indian Legal Requirements

The environmental regulations in India address protection of environment and natural resources that form the input to any process or activity as well as for management and handling of pollutants released from a process or activity. The social regulations in the country address concerns related to land acquired or purchased for development of a project; and labour and working conditions, worker welfare, health, and safety for those engaged across the project lifecycle.

A wider set of environmental, and occupational health and safety (EHS) and labour welfare regulations will be applicable to the waste management plant Projects. The businesses involved in providing collection & transportation of waste will however have limited application of the EHS regulations. A summary of EHS regulations and its application to ERMPL's focus areas is provided in **Annex-ESMS: 3-1 Part A and Part B**.

The nature of businesses that ERMPL will invest / operate could also result in involuntary / voluntary physical displacement and socioeconomic impacts. The regulations related to labour and working conditions will be applicable to all investments under the scope of the ESG Policy. The requirements of socio-economic and labour welfare related regulations are provided in **Annex-ESMS: 3-1 Part C**.

¹ https://www.eversourcecapital.com/app/uploads/2020/11/201105-ESG-Policy-ESGMS_GGEF_FINAL.pdf

In addition to above-mentioned regulatory requirements, various policies and notifications on waste handling, reuse, and management have been issued by various Ministries and State Governments in India. A summary of key requirements of the applicable policies and notifications have been provided in **Annex-ESMS: 3-1 Part D**.

3.2 Institutional Investor Safeguards

Institutional safeguards applicable to ERMPL include the following:

- IFC Performance Standards, 2012²
- The World Bank Group General Environmental, Health and Safety (EHS) Guidelines (2007) and relevant World Bank Group Industry Sector EHS Guidelines³
- Department of International Development (DFID) Toolkit on ESG for Fund Managers (2010)⁴
- ESM Policy Framework of National Investment and Infrastructure Fund comprising of E&S Policy, E&S Exclusion List and E&S Management Principles (2018)⁵
- Green Climate Fund's (GCF) environmental and social framework including E&S Policy (2018)⁶, Indigenous Peoples Policy (2018)⁷, Gender Policy, Information Disclosure Policy (2016)⁸ and Interim E&S Safeguards ("ESS") (2014)⁹
- FMO Sustainability Policy (2016)¹⁰
- United Nations Guiding Principles on Business and Human Rights (2011)¹¹
- The United Nations Sustainable Development Goals¹²
- BII's Fossil Fuel Policy¹³

A brief description of these investor safeguards as applicable to ERMPL and its key requirements has been provided in **Annex- ESMS: 3-2**.

² The applicable version of IFC-PS can be accessed [here](#)

³ The EHS Guidelines can be accessed [here](#).

⁴ The Department of International Development (DFID) Toolkit on ESG for Fund Managers can be accessed [here](#).

⁵ The E&S Policy of NIIF can be accessed through - https://www.niifindia.in/uploads/about/NIIFL_ES-Policy.pdf

⁶ The E&S Policy of GCF can be accessed through - <https://www.greenclimate.fund/document/revise-environmental-and-social-policy>

⁷ The Indigenous people policy of GCF can be accessed through - <https://www.greenclimate.fund/document/indigenous-peoples-policy>

⁸ The Information disclosure policy of GCF can be accessed through <https://www.greenclimate.fund/document/information-disclosure-policy>

⁹ <https://www.greenclimate.fund/sites/default/files/document/interim-ess.pdf>

¹⁰ <https://www.fmo-im.nl/en/sustainability>

¹¹ The publication on UNGPs can be accessed [here](#)

¹² The UN SDGs can be accessed [here](#)

¹³ BII's Fossil Fuel Policy can be accessed [here](#).

4 Management of E&S Risks for New Projects

ERMPL's business expansion is depended on increasing the footprint of their plants and operations under the various business segments in waste management. The business expansion may be through any of the following routes:

- **Project Bidding** - Urban local bodies, other government organizations or industries issues tender for the construction and operation & maintenance of projects. ERMPL bids for such projects.
- **Direct nomination** – Authorities or agencies directly nominate ERMPL for construction and operation & maintenance of projects.
- **Mergers & acquisition** – Existing plants or operations are acquired by ERMPL.

The plants and operations developed by ERMPL are mostly through the bidding and tendering process initiated by the urban local bodies, other government organizations or industries.

4.1 Project Bidding

4.1.1 Bidding Process

Potential projects are identified by the Business Development (BD) team from the Tender websites or existing/past clients. The call for bids is reviewed to understand the proposed project and its requirements. Any unresolved queries at this stage are resolved through clarifications at the pre-bid stage itself. For projects that are of interest to ERMPL, a site visit is undertaken by a multidisciplinary team for preliminary understanding of the proposed site in the context of its setting, sensitive receptors, past use, availability of water and electricity, etc.

Post the screening a further detailed internal risk assessment covering technical and financial aspects by each HoD is undertaken. Post this screening, the bid document is prepared covering the technical and financial aspects. On winning the bid and award of the project, ERMPL signs a concession agreement and post the legal formalities, the company receives the go ahead for the construction of the plant (or services, as the case may be).

Overall, the bidding process can be divided in three groups:

- Bid identification and shortlisting.
- Bid preparation and approval.
- Bid submission.

A schematic of the bidding process is presented in **Figure 4-1**.

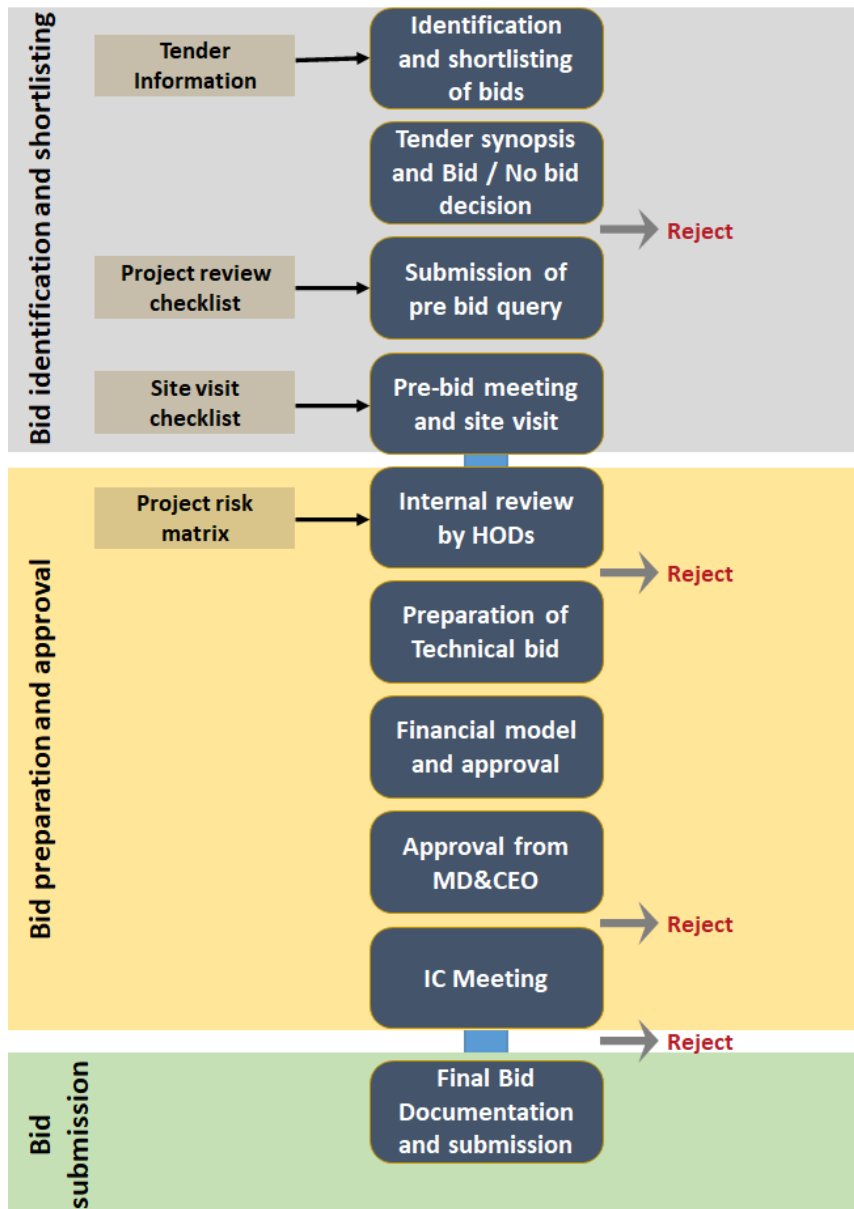


Figure 4-1 Bidding Process

4.1.2 E&S Integration in the Bidding Process

The bidding process starting from the shortlisting of the bids to the final bid submission generally have a very short time window. In most cases, the duration of bid submission is indicated to be in the range of 30 to 45 days. Also, ERMP does not bid for all target projects that are published and decisions are taken based on multiple factors and through a structured approach as discussed under **Section 4.1.1**. ERMP therefore recognizes that while a detailed E&S assessment needs to be undertaken for every target project, this will not be possible in the short time span available during the bidding process. Being a responsible company, ERMP therefore has adopted a staggered but robust approach for the E&S risk identification and subsequent management of E&S risk.

At the bidding stage, projects will be screened, categorized, and assessed based on the available information assimilated which will be used for the decision making in the bidding process. Once the project is awarded, detailed review of the project for E&S risk identification will be undertaken. E&S

risk mitigation measures will be incorporated in the project development based on all the risks identified through these processes.

Each of the processes are presented under **Section 4.4**.

4.1.3 Bidding Decision

The final bidding decision is taken by the Investment Committee (IC). Prior to this, the target project is reviewed by the MD & CEO and recommended for consideration of the IC. Across the approval process, the outcomes from the E&S risk assessment will be considered along with the technical and financial consideration of the target project. The following E&S risk and mitigation related information will be included in the Final Investment Committee (IC) Memorandum:

- Outcome of E&S screening
- Preliminary E&S risk assessment findings
- E&S categorisation and rationale behind the categorisation
- A summary highlighting any material E&S issues of relevance to the IC members and the recommendations from the HODs towards its mitigation.

On the recommendation of the IC, the B&T team will finalize and submit the bid for the target project.

4.1.4 E&S Risk Mitigation Post Award of Project

Recognizing that the timelines available for making a bid is generally very short in the context of undertaking a detailed E&S risk assessment and mitigation, ERMPL has put in place a multi-tiered approach to assess E&S risks from the target project. However, to ensure that there is a comprehensive E&S risk identification and mitigation in place, post the award of a project, ERMPL will undertake E&S review processes.

4.2 Direct Nomination

Government authorities or private agencies having responsibilities of waste management may invite ERMPL to set up a waste processing facility or a waste handling operation in their area of jurisdiction. ERMPL undertakes an internal review of the project feasibility and profitability of such operations.

For such projects also, ERMPL will undertake the process of screening and project E&S categorisation. This will be followed up with E&S Review. Post this, an internal document is prepared covering the technical and financial aspects and will be used for decision making along with the E&S review outcome.

The final decision to go ahead with the target nomination project is taken by the Investment Committee (IC) using the technical, financial, and E&S risk evaluations undertaken.

4.3 Mergers & Acquisition

ERMPL may also undertake the merger and acquisition (M&A) route for business expansion. Similar to the direct nomination process, ERMPL will undertake the process of screening and project E&S categorisation. This will be followed up with E&S Review.

The final decision to go ahead with the target M&A project is taken by the Investment Committee (IC) using the technical, financial and E&S risk evaluations undertaken.

4.4 E&S Risk Assessment for Business Expansion

The E&S risk assessment will be applicable to all target projects that ERMPL will explore. The E&S risk assessment processes will be integrated across the business expansion process relevant to the route as presented in **Table 4-1**.

Table 4-1: E&S Risk Assessment for Business Expansion

Project Biding	Direct nomination	Mergers & Acquisition
E&S Screening	E&S Screening	E&S Screening
ESS Screening	ESS Screening	ESS Screening
Preliminary E&S Risk Assessment	Preliminary E&S Risk Assessment	E&S Review (ESDD/ESIA)
Project Categorisation	Project Categorisation	Project Categorisation
IC meeting (for bidding decision)	E&S Review (ESDD/ESIA)	E&S Review (ESDD/ESIA)
E&S Review (ESDD/ESIA) (Post award of project)	IC meeting (for accepting nomination)	IC Decision (for Mergers & Acquisition)

The E&S risk assessment processes are described in the following sub-sections.

4.4.1 E&S Screening

ERMPL has adopted GGEF's Exclusion List that presents the projects that it will not finance. The Exclusion List is presented as **Annex-ESMS: 4-4-1**.

E&S Screening of the target project against the Exclusion list is preliminary activity undertaken once the target project is shortlisted for further consideration. Any target project that does not clear the E&S screening will be escalated to the Head of Department (HOD) B&T to initiate a no-go for the target project. The outcome will be documented.

Target projects that clear the E&S screening, will be taken forward in the bidding process and it will be formally recorded that the target project has cleared the Exclusion List using the format provided in **Tool:4-4-1**. The screening against the Exclusion List will be carried out by the B&T Team member and will be facilitated by the HSSE Head.

4.4.2 Environmental, Social and Safety (ESS) Screening

An ESS screening of the project site(s) will be undertaken post the target project clears the E&S screening. The aim would be to establish that the site clears the minimum requirements related to the

key geographical and physical features for the development of the project. This includes checks related to:

- Proximity to habitation.
- Proximity to NH/SH, railway line;
- Riverbank/ water bodies,
- Presence of environmentally critical areas like Eco Sensitive Zone (ESZ) / marine park, national park, sanctuary, bio spherical reserve, mangroves, CRZ, estuarine, wetland / breeding grounds etc.

A team comprising of members from the functions related to BD, HSSE, projects, land acquisition, finance and other functions (as relevant) will be involved in the process.

The **Tool: 4-4-2 on Environmental, Social & Safety Screening Criteria for Project Site** will be used for this purpose.

If multiple site alternatives are proposed, each site will be assessed through the ESS Screening checklist and the findings will be documented.

During the ESS Screening, the required information that could not be assimilated or issues that can cause uncertainties in decision making related to approval of the project will be compiled and communicated to the project bid issuer as pre-bid queries.

The responses received may be used to revise the ESS screening output, if required. Such revised ESS screening output will form part of the subsequent processes.

4.4.3 Preliminary E&S Risk Assessment

Once the target project clears the E&S and ESS screening stages, preliminary E&S risk assessment will be undertaken. The E&S risk assessment will assess the site and the settings in greater details including parameters such as:

- Location setting (like land use in and around the site, presence of protected areas, ecologically sensitive areas, habitation, etc.)
- Legacy waste issues
- Site access
- Groundwater issues, nearest receiving environment for discharges and emissions
- Possible resettlement / rehabilitation requirements; etc

Reliable data will be gathered during the process and interactions with relevant stakeholders will be undertaken. Information required will be accessed from recognized or authentic secondary sources and the data available with the team. The assessment will also cover issues so that plant operation is not hampered due to any environmental and social considerations and the site has free flow of inbound and outbound transportation, thus minimizing impact on the neighbouring community.

The E&S risk assessment will also be a site-based assessment. Similar to the ESS screening stage, a multi-disciplinary team will be involved in this assessment. The multi-disciplinary team is expected to provide expert inputs that will aid in objective E&S risk assessment for the target projects.

The **Tool: 4-4-3/F1 on Detailed Information for preliminary E&S Risk Assessment** will be used for this purpose. A detailed site visit report will be prepared aligned to the format presented in **Tool: 4-4-3/F2**.

While undertaking the preliminary E&S risk assessment, a rapid review of external factors to evaluate potential E&S risks or impacts will also be undertaken. External factors include public media articles, journal articles, readily available newspaper reports and/or publications that reference the target project, bid issuer and/or location.

4.4.4 Project Categorisation

The target projects will be further assigned a category based on the E&S risks and impacts of the projects under the investment. Categories are determined based on the basis of the Project's component presenting the highest environmental or social risk and potential impacts in the Project area. The E&S screening and categorisation framework has been developed in alignment with the reference framework outlined in **Section 3** of this ESMS and is guided by the ESGMS of GGEF. Since ERMPL makes investment in assets and at no time will it invest into a financial intermediary, category Financial Institution (FI) has not been considered in this ESMS.

The projects will be categorized under any one of the categories tabulated below:

Category	Definition of Category
A	<ul style="list-style-type: none"> • An investment is categorized as Category A if it is likely to have significant adverse environmental and social impacts that are irreversible, cumulative, diverse and/or unprecedented. These impacts may affect an area larger than the target site or facility subjected to physical works and may be temporary or permanent in nature. • Category A investments are classified as high risk
B	<ul style="list-style-type: none"> • An investment is categorized as Category B if it has limited number of potential adverse environmental and social impacts that are not unprecedented, few in nature, no irreversible or cumulative impacts and limited to the target site or facility. Category B investments can be readily mitigated through operational procedures and management processes. • Category B investments are classified as medium risk
C	<ul style="list-style-type: none"> • An investment is categorized as Category C if it is likely to have minimal or no adverse E&S impacts. • Category C investments are classified as low risk

At this stage the categorization will be considered as **preliminary** and post the E&S review stage (refer **Section 4.4.5**), the categorization will be reconfirmed.

The categorization will draw from the outcomes of the preliminary E&S risk assessment (refer **Section 0**). For consistent application of categorization methodology, the E&S Categorization Checklist (**Tool:4-4-4**) will be used for all projects.

Any target project that is categorized under category A will not be considered for further evaluation and bidding. This will be documented and the bidding and tendering process / M&A process for the target project will be closed. This will be internally communicated to all relevant decision makers including the MD & CEO.

The outcomes of the Project Categorisation process along with the Project Risk Matrix (assessed for technical feasibility) will be presented to the HODs for the internal review. The internal review will consider the risks and provide inputs for consideration in technical aspects. These inputs will be considered in preparation of the technical bid and financial model of the target project. The Minutes of the meeting of the HODs will be recorded and documented.

4.4.5 E&S Review – ESDD & Additional Studies

For projects through the bidding route, post award of the project, ERMPL will undertake the E&S review of the project through conduct of E&S Due Diligence (ESDD), while for direct nominated project opportunities and mergers & acquisitions, the ESDD will be a prerequisite for decision making. If ESDD findings require, other additional studies will be commissioned.

The review will be based on the category assigned to the project guided by the following:

Categorization	Proposed E&S Review
B	<ul style="list-style-type: none"> • For projects under Category B, ERMPL will engage an external consultant for conduct of ESDD. • ESDD will be conducted in accordance with the requirements of the reference framework outlined in Section 3. • Additional studies, if identified in the ESDD will be subsequently conducted.
C	<ul style="list-style-type: none"> • For projects under Category C, the ESDD may be conducted by engaging an external consultant or internally by the HSSE Head with support from the internal teams. • ESDD will be conducted in accordance with the requirements of the reference framework outlined in Section 3.

Note: As a policy, ERMPL will not invest in Category A projects

4.4.5.1 E&S Due Diligence

The Terms of Reference (ToR) for conduct of the ESDD are provided in **Annex-ESMS: 4-4-5-1**. The ToR will be suitably modified and issued by the HSSE Head giving due consideration to the project and its risks emerging from the preliminary E&S risk assessment (refer **Section 0**).

For Category C projects, if the decision to conduct the ESDD is by the internal team of ERMPL, the rationale for the same will be documented along with approval of the MD & CEO for the same.

Based on the review, the project categorization will be reassessed and documented.

The outcome of the ESDD for all projects will be:

- Identification of material E&S risks that ERMPL will be exposed to during the lifecycle of the project.
- Identification of non-compliances or gaps with respect to the Reference Framework requirements and risk classification.
- Identification of mitigation measures in the form of E&S Action Plan and/or additional studies required of the project (if any) along with tentative budget estimates.

4.4.5.2 Additional Studies

Based on the project configuration and the outcomes of the ESDD, the additional studies with respect to land, flooding, migrant labour, working conditions, indigenous people, critical habitat, etc. may be required to be conducted. These studies will be conducted through competent consultants / experts. Depending on the project asset, conduct of Environmental & Social Impact Assessment (ESIA), (refer to **Annex-ESMS: 4-4-5-2**) Biodiversity Assessment, Supply Chain Audit, Phase I/II level assessments, flood risk assessment etc. could be recommended as additional studies. A decision for conduct of the same and their impact on the project will be taken by the HSSE Head in consultation with the Investment Committee, Project Team and where applicable, the third-party agency conducting the ESDD.

4.4.6 E&S Action Plan

For the non-compliances and gaps identified during the ESDD, an E&S Action Plan (ESAP) will be developed. The ESAP will have the following components:

- Action items to address any non-conformances, red flag issues, potential risks and significant impacts identified during the ESDD process.
- Action items to align the project with the ESG Policy and ESMS
- Define the roles, responsibilities, supervisory structures, timelines, and measurable outcomes of each action item; and
- Provide a budget estimate/ resource needs (where relevant) to close out an action item.

An indicative ESAP format is presented as **Tool: 4-4-6**.

The ESAP will be finalized based on discussions with the project team and third-party consultant, where relevant by the HSSE Head.

Post finalization and approval of the ESAP, the ESAP will be communicated to design team as well as the project team, for incorporation of the actions across the lifecycle of the project.

Tool: 7-1 will be used for ESAP monitoring.

5 Management of E&S Risks in Construction Projects

ERMPL will proactively identify and manage the environmental and social (E&S) risks arising during the construction phase of its projects. To enable continuous improvement of E&S performance of the Company and encourage the same at company contractor level, the key E&S risks caused by the construction activities are identified. It is expected that management of these risks and impacts can lead to better economic, financial, social, and environmental outcomes in the business.

The Corporate ESMS has been designed commensurate to the nature and scale of environmental and social risks and impacts identified in this section.

The potential environmental, occupational health and safety, labour & working conditions and community health and safety related risks and impacts that are applicable to construction phase of a project have been considered and documented in the following sections. Management Programs and Procedures have been developed including appropriate control measures that can be undertaken to manage activities that contribute to the risks and impacts.

5.1 Environmental Risks

The major environmental impacts from the construction phase of a project will be on air quality, water quality, soil quality, ambient noise, and an increase in traffic movement. At ERMPL, construction phase works is dependent on the plant under construction and may include site clearance, site formation, building works, infrastructure provision, and other infrastructure activities.

The potential risks and impacts related to environment that are posed during the construction phase of the projects are listed in **Table 5-1**.

Table 5-1: Potential Environmental Risks associated with Construction Phase of ERMPL Projects

#	Potential Environmental Risk factors	Potential negative impacts/implications
1	Clearance of vegetation	Loss of green cover as well as loosening of soil
2	Habitat alteration and biodiversity impacts	Alteration of terrestrial habitats, with impacts to vegetation, other flora and fauna and related biodiversity
3	Alteration of natural drainage pattern	Altered stormwater flows
4	Requirement of large quantities of fresh water	Groundwater depletion in the vicinity of the plants, where the plants are dependent on groundwater
5	High requirements for power supply	High energy consumption GHG emissions and associated climate risks
6	Generation of particulate air pollutants	Pollution of air Non-compliance with stipulated emission standards.
7	Use of large quantities of fuel (gas/diesel/coal/etc.) for construction	Pollution of air GHG emissions and associated climate risks
8	Vehicular emissions	Ambient air pollution

#	Potential Environmental Risk factors	Potential negative impacts/implications
9	Generation of wastes and emissions that does not meet environmental quality standards or are difficult to dispose and from residual liquids in the waste itself	Pollution of air Groundwater pollution Non-compliance with stipulated emission standards.
10	Generation of wastewater	Contamination of ground and/or surface water due to improper disposal of wastewater
11	Generation of noise and vibrations	Hearing loss / impacts on nearby pollution
12	Spills of fuel, oil and grease from construction equipment and transport vehicles, chemicals such as paints, improperly managed wastewater generated from construction activities on unpaved areas etc.	Soil contamination

Considering that the environmental impacts are dependent on the project site - the environmental, geological, hydrogeological features of the geographical settings of the site, every project site will have to be assessed independently. A procedure has been developed to ensure systematic identification and evaluation of all environmental aspects for all construction activities and services being undertaken by the Company for every projects. Refer the **Annex-ESMS: 5-1** for the procedure on Environmental Risk Evaluation. The outcome of the exercise will be documented as Environmental Aspect Impact Register (EAIR) using **Tool: 5-1**. Development of the EAIR will involve analysing each process activity that contributes towards the environmental impact. The adequacy of existing controls will be reviewed to identify areas of improvement.

5.2 OHS Risks

The potential occupational health and safety (OHS) hazards and risks arising from the construction phase of the projects are presented in **Table 5-2**.

Table 5-2: Potential Hazards and Risks associated with Construction Phase of ERMPL Projects

#	Potential Occupational Hazards and associated risks	Potential negative impacts / implications
1	Exposure to particulates and dust to workers	Inhalation of dust Allergic reactions from dust
2	Exposure to Biological Hazards	Inhalation of dust and aerosols Skin irritations and other allergic reactions from dust and chemicals
3	Exposure to high noise levels	Mental Stress and anxiety

#	Potential Occupational Hazards and associated risks	Potential negative impacts / implications
4	Exposure to physical hazards such as slip trip and falls and collision that could result in body injuries and mental stress	Possible injury or fatalities lower productivity and poor morale amongst staff Loss of reputation
5	Exposure to risks of fire, explosion incidents and other emergency incidents	Possible injury or fatalities, loss of property Loss of reputation
6	Exposure to electrical shocks, burns or electrocution	Ill health, mortality, and medical costs Loss of reputation
7	Road Accidents	Possible injury or fatalities, medical costs lower productivity and poor morale amongst staff Loss of reputation

In addition, a procedure has been developed to ensure systematic identification and evaluation of all OHS hazards for all construction activities and services being undertaken by the Company. Refer the **Annex-ESMS: 5-2** for the procedure on Occupational Health and Safety Risk Evaluation. The outcome of the exercise will be documented as Hazard Identification and Risk Assessment with Identification of Opportunities (HIRAO) Register using **Tool: 5-2**. Development of the HIRAO Register will involve analysing activities / Operations (Routine, Non-routine activities and situations like severe rain, extreme temperature, emergencies etc.) within the construction project site and the activities and situations outside the project site area which directly or indirectly controls the working conditions inside the project site area. The adequacy of existing controls will be reviewed to identify areas of improvement.

5.3 Labour and Working Conditions Risks

ERMPL is committed towards providing good working conditions and adopting fair labour practices. The Company acknowledges that negligence towards providing appropriate labour and working conditions could lead to high levels of turnover and absenteeism leading to higher cost for recruitment and training. Worker productivity suffers with unsafe working conditions and lack of conducive environment. Poor working conditions can also lead to worker strikes that can be a drain on management time and resources causing delays and reputation damage. The Company has thus identified the risks related to potential labour and working conditions posed to the business during the construction phase of projects as presented in **Table 5-3**.

Table 5-3: Potential Risks in Labour and Working Conditions in Construction Phase of ERMPL Projects

#	Potential Labour and Working Conditions	Potential negative impacts / implications
1	Discrimination in Employment (e.g., abrupt termination of the employment, working conditions, wages, or benefits etc	Discrimination, Attrition Lower productivity and poor morale amongst staff.

#	Potential Labour and Working Conditions	Potential negative impacts / implications
2	Lack of awareness amongst managers and supervisors of worker's rights under the national labour laws or collective agreements.	Exploitation of workers Human rights violation Punishment/penalties and loss of reputation
3	Forced labor or penalty labor through practices such as signing bonds, retaining caution money etc.	Exploitation of workers Human rights violation Punishment/penalties and loss of reputation
4	Deployment of Child labor.	Exploitation of workers. Human rights violation Non-compliance with stipulated working norms Punishment/penalties and loss of reputation
5	Non-compliance with labor laws with respect to working hours, wages, social security measures, worker insurance, accident compensation.	Exploitation of workers Non-compliance with stipulated working norms. Punishment/penalties and loss of reputation
6	Apprentice program providing young workers with training and work experience and not complying with labour laws on nature of work, hours of work and working conditions.	Exploitation of workers. Worker Safety. Non-compliance with stipulated working norms. Punishment/penalties and loss of reputation
7	Discrimination between migrant and non-migrant workers, misusing migrant worker's vulnerability.	Exploitation of workers. Human rights violation. Non-compliance with stipulated working norms. Punishment/penalties and loss of reputation
8	Differential treatment towards contract labour, especially in terms of wages, social security measures, worker insurance, accident compensation and working conditions.	Exploitation of workers. Worker Safety. Non-compliance with stipulated working norms. Punishment/penalties and loss of reputation
9	Absence of procedure for workers to express their grievances.	Discrimination Disciplinary abuse and harassment.
10	Harassment, intimidation, and/or exploitation, especially in regard to women.	Exploitation and harassment of women work force.
11	Lack of awareness or due diligence of supply chain labor risks in outsourced / contracted processes.	Exploitation of workers.

Considering that the ERMPL construction project sites are present in multiple geographies and that the local practices impact the labour and working conditions in the construction project sites, ERMPL has established a procedure to ensure risk evaluation in the Labour and Working Conditions applicable to all plants operated by the Company. The outcome of the exercise will be documented as Labour and Working Conditions Risk Register (LWCRR). The adequacy of existing controls will be reviewed to identify areas of improvement. The significant risks will be managed in a way that reduces or eliminates the significant social impacts associated with them.

Refer **Annex-ESMS: 5-3** for the procedure on Labour and Working Conditions Risk Evaluation. The identified **Labour and Working Conditions** risks will be documented as per the format **Tool: 5-3**.

5.4 Community Risk Evaluation

ERMPL is committed to managing their construction phase activities in a manner that does not endanger the health, safety, and security of the communities around which they operate. The Company acknowledges that inefficient management of construction project site can impact community resources or become the source of nuisance to the neighbouring community or result in accidents that can impact the community resulting in protests and litigations. Maintaining the ‘social licence to operate’ is thus imperative for ERMPL’s operations and reputation.

ERMPL recognizes these risks and has identified the potential community related risks related to the construction activities at project sites as presented in **Table 5-4**.

Additionally, issues related to Community Health, Safety, and Security are addressed through Stakeholder Engagement and External Communications and Grievance Mechanisms (**Refer Section 10.1 and 10.2**).

Table 5-4: Potential Community H&S Risk and Impacts from with Construction Phase of ERMPL Projects

#	Potential Community Risks	Potential negative impacts / implications
1	Unavailability of groundwater for community use due to groundwater depletion caused by excessive consumption at the construction site	Groundwater depletion in the region
2	Degraded quality of groundwater or surface water available to the community due to leachate contamination from waste storage	Health Issues in neighbouring community
4	Inadequate fire protection systems or poor maintenance of construction site	Possible injury and mortality Loss of reputation
5	Increased vehicle traffic around the construction site from transportation of materials leading to congestion and risk of accidents	Conflict with local community Loss of reputation

#	Potential Community Risks	Potential negative impacts / implications
6	Potential threat related to freedom of movement or harassment to public staying around the facility from the Security guards	Conflict with local community. Loss of reputation

5.5 Management of E&S Risks in Construction Projects

ERMPL recognizes that while some of the E&S risks are inherent to the type of construction activities that it pursues at its project sites, there are other risks that are function of the geographical location, use of technology in use, workforce availability, etc. Hence for ERMPL, risk assessment and management are a continuous process and undertaken for each project.

Cognizant of the environmental and social risks and impacts identified through the risk assessment process defined in the previous section (**Sections 5.1 to 5.4**), ERMPL recognizes the need for a plan for construction management for projects under construction. The E&S Management controls will arise from the E&S actions that will be mandatorily undertaken during the construction phase.

ERMPL will require all contractors to operate in accordance with national, state, and local level regulations and Good International Industry Practices (GIIP), and implement construction and operational phase Environment, Health and Safety and Security (EHSS) management plans/ESAP.

E&S Specifications/ Standard E&S contract conditions for Contractors will cover the HSSE requirements to be implemented during construction and operation phase as required.

The procedure established at ERMPL as part of Contractor Management includes and is not limited to:

- The Contractor will identify (with guidance from the ERMPL’s HSSE team) and follow the various legal and other statutory requirements applicable during the course of execution and keep up date in the form of "Register of Regulation" (ROR) to ensure the compliance with all applicable statutory regulatory and other requirements.
- All activities at site will be started after assessing the E&S risk as per ERMPL’s procedures. Refer the related procedures mentioned under sections 5.1 to 5.4.
- All construction activities will be undertaken in compliance to the **Building and Other Construction Workers’ (Regulation of Employment and Conditions of Service) Rules** (central and state) and CLA, 1970
- A **monitoring team** will be constituted to supervise the EHS performance of the site periodically. However, on an ongoing basis the key EHS supervision responsibility will lie with the contractor and for this competent supervisor(s) will be deputed.
- All workers at the site will be provided the required **personal protective equipment (PPE)** depending on the nature of the work undertaken.
- Provision of **first aid** and availability of trained first aiders will be ensured on site at all times.

- Adequate number and types of **fire extinguishers** will be available at the site and will be deployed at work location that have fire hazards.
- At sites where heavy movement of traffic is envisaged, a **traffic management plan** will be developed and deployed.
- **Barricading** will be practiced at the site to warn personnel or limit access to hazardous areas, or both.
- Following **procedures** will be mandatorily implemented at the site:
 - Permit to Work
 - Incident reporting (Refer the **Tool: 7-4 of the ESMS**)
 - Grievance Handling Procedure (Refer the **Annex- ESMS: 10-2 and Tool 10-2**)
 - Emergency preparedness in the context of the site (Refer the **Annex-ESMS: 10-3 and Tool 10-3/A, Tool 10-3/B**)
- **Training (induction and routine) and Toolbox Talks** relevant to the site conditions and activities will be conducted.

In addition, implementation of the **Contractor EMP** will also form a key aspect towards the management of E&S Risks due to construction phase activities on ERMPL project sites.

5.5.1 Contractor EMP

The Company engages Contractors for construction activities that can be broadly divided under three categories:

- **The Company appoints contractors on package basis.**
- **The Company appoints Turnkey EPC (T-EPC) Contractors for various construction activities.**
 - The Contractors may engage sub-contractors to carry out specific work from the allotted work packages.
- **The company may adopt a hybrid model with major components being awarded on T-EPC basis and balance of plant on package basis.**

All Contractors will be required to implement the Contractor Environmental & Social Management Plan (Contractor EMP) while carrying out their activities and will form part of the contract agreement. A Contractor EMP is presented as **Annex-ESMS: 5-2-1**. The Contractor's EMP presents the measures to be adopted by the Contractors during construction activities in a manner that impact on the environment, construction site workers and surrounding community is minimal. The objectives of the Plan are:

- Compliance to conditions stipulated in the Consent to Establish (CtE) granted to the project.
- Compliance to the requirements stated in the **Building and Other Construction Workers' (Regulation of Employment and Conditions of Service) Rules** (central and state) and CLA, 1970.
- Management of adverse impacts on environment, construction site workers and surrounding communities from construction activities undertaken through Contractors;
- Ensure that the safety recommendations are complied with.

- Maintaining 'social license to operate' and preventing legal action from regulatory bodies and neighbouring communities; and

The Contractor EMP identifies the responsibilities of various functions towards implementation and supervision of the Plan, management measures to be adopted on environment, health & safety, and monitoring activities to be carried out.

This EMP shall apply to all Contractors appointed for conduct of various construction activities. The Contractor holds primary responsibility for implementation of the requirements of this Plan. The Contractor is also responsible for ensuring that any relevant subcontracted work meets these requirements.

The Company is responsible for maintaining oversight and monitoring implementation through audits and inspection.

The specific roles and responsibilities of the Company, Contractor and Workers are also provided in **Annex-ESMS: 5-2-1**.

6 Management of E&S Risks in Operational Plants

ERMPL will proactively consider the environmental and social (E&S) risks arising from its plants and operations. To enable continuous improvement of E&S performance of the Company, the key E&S risks posed by the plants and operations are identified. ERMPL believes that the management of these risks and impacts can lead to better economic, financial, social, and environmental outcomes.

The key E&S risks identified have been considered to establish appropriate control measures through Management Programs and other procedures. Further to this, ERMPL has processes at the operational levels to undertake E&S risk and impact evaluation so that risk mitigation measures can be implemented at granular level. The E&S risk and impact evaluation has been undertaken commensurate to the nature and scale of the plants and operations.

The key environmental, occupational health and safety, social and community health and safety-based risks that are applicable to plants and operations have been considered and tabulated in the following sections.

6.1 Environmental Risks

The potential risks and impacts related to environment that are posed from ERMPL's operations are presented in **Table 6-1**.

Further, a procedure has been developed to ensure systematic identification and evaluation of all environmental aspects for all plants and operations of the Company. Refer the **Annex-ESMS: 5-1** for the procedure on Environmental Risk Evaluation. The outcome of the exercise will be documented as Environmental Aspect Impact Register (EAIR) using **Tool: 5-1**. Development of the EAIR will involve analysing each process activity that contributes towards the environmental impact. The adequacy of existing controls will be reviewed to identify areas of improvement.

Table 6-1: Potential Environmental Risks associated with ERMPL's Plants and Operations

#	Potential Environmental Risk factors	Potential negative impacts/implications
1	Requirement of large quantities of fresh water	Groundwater depletion in the vicinity of the plants and operations, where they are dependent on groundwater
2	High requirements for power supply	High energy consumption GHG emissions and associated climate risks
3	Generation of air emissions from the process operations	Pollution of air Non-compliance with stipulated emission standards.
4	Use of large quantities of fuel (gas/diesel/coal/etc.) for operations.	Pollution of air GHG emissions and associated climate risks
5	Dust, Bio-aerosols, and Odours from waste storage	Ambient air pollution, health of waste workers & nearby community
6	Vehicular emissions	Ambient air pollution

#	Potential Environmental Risk factors	Potential negative impacts/implications
7	Leachate from waste piles caused by exposure to precipitation and from residual liquids in the waste itself	Groundwater pollution
8	Generation of large (or significant) quantities of wastewater	Contamination of ground and/or surface water due to improper disposal of wastewater
9	Noise and vibration from vehicular traffic movement	Hearing loss / impacts on workers
10	Fugitive emissions associated with biological treatment processes, as well as emissions from burning of biogas.	Ambient air pollution
11	Treatment residue disposal	Land contamination

6.2 OHS Risks

The potential occupational health and safety (OHS) hazards and risks that emanate from ERMPL's plants and operations are presented in **Table 6-2**.

Further, a procedure has been developed to ensure systematic identification and evaluation of all OHS hazards for all activities and services operated by the Company. Refer the **Annex-ESMS: 5-2** for the procedure on Occupational Health and Safety Risk Evaluation. The outcome of the exercise will be documented as Hazard Identification and Risk Assessment with Identification of Opportunities (HIRAO) Register using **Tool: 5-2**. Development of the HIRAO Register will involve analysing activities / Operations (Routine, Non-routine activities and situations like severe rain, extreme temperature, emergencies etc.) inside the plant and the activities and situations outside the plant which directly or indirectly controls the working conditions inside the plant. The adequacy of existing controls will be reviewed to identify areas of improvement.

Table 6-2: Potential Hazards and Risks associated with ERMPL's Plants and Operations

#	Potential Occupational Hazards and associated risks	Potential negative impacts / implications
1	Exposure to risks of fire, explosion incidents and other emergency incidents	Possible injury or fatalities, loss of property. Loss of reputation.
2	Exposure to Biological Hazards	Inhalation of dust and aerosols Skin irritations and other allergic reactions from dust and chemicals
3	Exposure to electrical shocks, burns or electrocution	Ill health, mortality, and medical costs.
4	Exposure to biogas	Ill health and medical costs.

#	Potential Occupational Hazards and associated risks	Potential negative impacts / implications
5	Exposure to physical hazards such as slip trip and falls and collision that could result in body injuries and mental stress	Possible injury, lower productivity, and poor morale amongst staff.
6	Road Accidents	Possible injury or fatalities, medical costs lower productivity and poor morale amongst staff Loss of reputation

6.3 Labour and Working Conditions Risks

ERMPL is committed towards providing good working conditions and adopting fair labour practices. The Company acknowledges that negligence towards providing appropriate labour and working conditions could lead to high levels of turnover and absenteeism leading to higher cost for recruitment and training. Poor working conditions can also lead to worker strikes that can be a drain on management time and resources causing deterioration of service quality and reputation damage.

Acknowledging these plants and operations risks, ERMPL has identified the potential labour and working conditions related risks posed related to its operations as presented in **Table 6-3**.

Table 6-3: Potential Risks in Labour and Working Conditions from ERMPL's Plants and Operations

#	Potential Labour and Working Conditions	Potential negative impacts / implications
1	Discrimination in Employment (e.g., abrupt termination of the employment, working conditions, wages, or benefits etc	Discrimination, Attrition Lower productivity and poor morale amongst staff.
2	Lack of awareness amongst managers and supervisors of worker's rights under the national labour laws or collective agreements.	Exploitation of workers Human rights violation Punishment/penalties and loss of reputation
3	Forced labor or penalty labor through practices such as signing bonds, retaining caution money etc.	Exploitation of workers Human rights violation Punishment/penalties and loss of reputation
4	Deployment of Child labor.	Exploitation of workers. Human rights violation Non-compliance with stipulated working norms Punishment/penalties and loss of reputation
5	Non-compliance with labor laws with respect to working hours, wages, social security measures, worker insurance, accident compensation.	Exploitation of workers Non-compliance with stipulated working norms

#	Potential Labour and Working Conditions	Potential negative impacts / implications
		Punishment/penalties and loss of reputation
6	Absence of procedure for workers to express their grievances.	Discrimination Disciplinary abuse and harassment
7	Harassment, intimidation, and/or exploitation, especially in regard to women.	Exploitation and harassment of women work force.
8	Lack of awareness or due diligence of supply chain labor risks in outsourced / contracted processes.	Exploitation of workers.

Considering that the ERMPL plants and operations are operational in multiple geographies and that the local practices impact the labour and working conditions in the plants and operations, ERMPL has established a procedure to ensure risk evaluation in the Labour and Working Conditions applicable to all plants and operations operated by the Company. The outcome of the exercise will be documented as Labour and Working Conditions Risk Register (LWCRR). The adequacy of existing controls will be reviewed to identify areas of improvement. The significant risks will be managed in a way that reduces or eliminates the significant social impacts associated with them.

Refer **Annex-ESMS: 5-3** for the procedure on Labour and Working Conditions Risk Evaluation. The identified **Labour and Working Conditions** risks will be documented as per the format **Tool: 5-3**.

6.4 Community Risk Evaluation

Inadequate management of facility operations or services can impact community resources or cause nuisance to the neighbouring community. Such community health & safety risks can create impacts that can lead to protests and litigations. Maintaining the ‘social licence to operate’ is thus imperative for ERMPL’s operations and reputation.

ERMPL recognizes these plants and operations risks and has identified the potential community related risks related its operations as presented in **Table 6-4**.

Refer **Annex-ESMS: 6-4** for the procedure on Community Risk Evaluation. The identified **Community** risks will be documented as per the format **Tool: 6-4**.

Additionally, issues related to Community Health, Safety, and Security are addressed through Stakeholder Engagement and External Communications and Grievance Mechanisms (**Refer Section 10.1 and 10.2**).

Table 6-4: Potential Community H&S Risk and Impacts from ERMPL’s Plants and Operations

#	Potential Community Risks	Potential negative impacts / implications
1	Poor ambient air conditions due to fugitive emissions and odour from	Health Issues in neighbouring community

#	Potential Community Risks	Potential negative impacts / implications
	waste processing activities or storage	
2	Unavailability of groundwater for community use due to groundwater depletion caused by excessive consumption by the plants and operations	Groundwater depletion in the region
3	Degraded quality of groundwater available to the community due to land contamination by the waste storage causing leaching of contaminants into the ground water aquifer	Health Issues in neighbouring community
4	Operations involve air emissions, that may pass on to the surrounding community	Health Issues in neighbouring community
5	Inadequate fire protection systems or poor maintenance of plants and operations to assure life and fire safety	Possible injury and mortality Loss of reputation
6	Increased vehicle traffic around the plants from transportation of waste leading to congestion and risk of accidents	Conflict with local community Loss of reputation
7	Potential threat related to freedom of movement or harassment to public staying around the facility from the Security guards	Conflict with local community. Loss of reputation

6.5 Management of EHS and Social Risks

ERMPL recognizes that while some of the E&S risks are inherent to the type of plants and operations that it pursues, there are other risks that are function of the geographical location, use of technology in use, quality of waste being handled, workforce availability, etc. Hence for ERMPL, risk assessment and management are a continuous process.

ERMPL has prepared an E&S management plan to avoid where practicable, minimize and/or offset environmental and social risks and impacts identified through the risk assessment process defined in the previous section (**Sections 6.1 to 6.4**). The E&S Management Plan of ERMPL comprises of E&S actions that are mandatorily undertaken by the plants and operations and operational procedures that include technological / operational control/ competence / measurement & monitoring measures that are implemented. The procedures are mapped to the E&S Actions. Refer **Table 6-5**.

In addition to the E&S Action Plan presented in **Table 6-5** there will be E&S Actions and Procedures that will emanate from the facility level risk assessments on environment, occupational health & safety, labour & working conditions, and community health & safety. These will be developed at the individual plants and operations of ERMPL to address their specific E&S risks and impacts. List of such procedures will be maintained at the individual plants and operations.

Further to this, ERMPL has an Integrated Management System designed to meet the requirements of ISO 9001: 2015, ISO 14001: 2015, ISO 45001:2018 and SA 8000: 2014. The IMS details the structure of Quality Management System (QMS), the Environmental Management System (EMS) and the Occupational Health and Safety Management System (OHSMS) and Social Accountability in the Organization. The IMS manual gives the inter-linkages of the various processes in all the activities related to the plants and its locations.

Table 6-5: E&S Management Plan and Operational Procedures

#	E&S Risks	Applicable to Facility at minimum	E&S Action Plan		E&S Operational Procedures / Policies	
			E&S Actions	Responsibility	E&S Procedure / Policies	Reference to Annex/ Document
Facility: Bio CNG-MSW – CBG-M; Bio CNG-Press Mud – CBG-PM; Bio CNG-Agro – CBG-A; Compost – COM; C&D; C&T; WtE						
A Environmental						
1)	Requirement of large quantities of fresh water	CBG-M, CBG-PM, CBG-A, COM, WtE	<ul style="list-style-type: none"> Water conservation measures to be incorporated at the design stage. Monitoring & measurement measures 		Monitoring and Measurement of Equipment	IEISL/IMS/P-17
2)	High requirements for power supply	CBG-M, CBG-PM, CBG-A, COM, C&D, WtE	<ul style="list-style-type: none"> Energy efficient technologies to be incorporated at the design stage. Monitoring & measurement measures 		Monitoring and Measurement of Equipment	IEISL/IMS/P-17
3)	Generation of air emissions from the process operations	CBG-M, CBG-PM, CBG-A, C&D, WtE	<ul style="list-style-type: none"> Emission control equipment to be incorporated at the design stage. Monitoring & measurement measures 		Monitoring and Measurement of Equipment	IEISL/IMS/P-17
4)	Use of large quantities of fuel	C&T	<ul style="list-style-type: none"> Preventive maintenance of Vehicles 		Operational Control	IEISL/IMS/P-12
5)	Odour generation	CBG-M, CBG-PM, C&T, WtE	<ul style="list-style-type: none"> To be included by EMRPL 			
6)	Vehicular emissions	CBG-A, C&T, WtE	<ul style="list-style-type: none"> Preventive maintenance of Vehicles Ensuring vehicles are compliant to pollution under control regulatory requirements 			
7)	Leachate from waste piles caused by	CBG-M, CBG-PM,	<ul style="list-style-type: none"> To be included by EMRPL 			

#	E&S Risks	Applicable to Facility at minimum	E&S Action Plan		E&S Operational Procedures / Policies	
			E&S Actions	Responsibility	E&S Procedure / Policies	Reference to Annex/ Document
	exposure to precipitation and from residual liquids in the waste itself	CBG-A, COM, WtE				
8)	Generation of large (or significant) quantities of wastewater	CBG-M, CBG-PM, CBG-A, WtE	<ul style="list-style-type: none"> • Effluent Treatment Plant to be incorporated at the design stage. • Operational control • Monitoring & measurement measures 		Monitoring and Measurement of Equipment	IEISL/IMS/P-17
9)	Noise and vibration from vehicular traffic movement	CBG-A, C&T, WtE	<ul style="list-style-type: none"> • Preventive maintenance of Vehicles 			
10)	Fugitive emissions associated with biological treatment processes, as well as emissions from burning of biogas.	CBG-M, CBG-PM, CBG-A, COM, WtE	<ul style="list-style-type: none"> • Control measures to be incorporated at the design stage. • Monitoring & measurement measures 		Monitoring and Measurement of Equipment	IEISL/IMS/P-17
11)	Treatment residue disposal	CBG-M, CBG-PM, CBG-A, COM, WtE	<ul style="list-style-type: none"> • Residue to be disposed in landfill facilities as mandated by the authorities. • Operational Control • Monitoring & measurement measures 		Monitoring and Measurement of Equipment	IEISL/IMS/P-17
B	Occupational Health & Safety					
12)	Exposure to risks of fire, explosion incidents and other emergency incidents	CBG-M, CBG-PM, CBG-A, COM, WtE	<ul style="list-style-type: none"> • Each site to identify the potential emergency situations related to fire and explosion and develop plans and 		Emergency preparedness and Response	EISL/IMS/P-16

#	E&S Risks	Applicable to Facility at minimum	E&S Action Plan		E&S Operational Procedures / Policies	
			E&S Actions	Responsibility	E&S Procedure / Policies	Reference to Annex/ Document
			install associated infrastructure			
13)	Exposure to Biological Hazards	CBG-M, CBG-PM, CBG-A, COM, C&T, WtE	<ul style="list-style-type: none"> Use of appropriate PPE Annual health check-up 			
14)	Exposure to electrical shocks, burns or electrocution	All plants and operations	<ul style="list-style-type: none"> Use of appropriate PPE Periodic training on electrical safety Routine Electrical Safety Inspections 			
15)	Exposure to biogas	CBG-M, CBG-PM, CBG-A	<ul style="list-style-type: none"> Use of appropriate PPE while working with biogas Annual health check-up 			
16)	Exposure to physical hazards such as slip trip and falls and collision that could result in body injuries and mental stress	All plants and operations	<ul style="list-style-type: none"> Ensuring the requirements for avoiding slip, trip and falls are adhered to. Training and awareness building on general guidelines for working safety 			
C	Labour & Working Conditions					
17)	Discrimination based on personal characteristics such as gender, race, ethnicity, social and indigenous origin, religion or belief, disability, age, or sexual orientation.	All plants and operations			Policy on Employee Fair Play and Equal Opportunities Code	
18)	Lack of awareness amongst managers and supervisors of worker's rights under the	All plants and operations	<ul style="list-style-type: none"> Training and awareness raising on Employee 			

#	E&S Risks	Applicable to Facility at minimum	E&S Action Plan		E&S Operational Procedures / Policies	
			E&S Actions	Responsibility	E&S Procedure / Policies	Reference to Annex/ Document
	national labour laws or collective agreements.		Conduct & Work Rules			
19)	Forced labor or penalty labor through practices such as signing bonds, retaining caution money etc.	All plants and operations	<ul style="list-style-type: none"> Practices that could lead to forced labour like signing of bonds for joining, retaining educational certificates or deduction caution money is not practised 			
20)	Deployment of Child labor.	All plants and operations	<ul style="list-style-type: none"> Mandatory age verification of workers at the time of appointment through a government recognized identification 		Procedure for Child Labour Remediation	IEISL/IMS/P-29
21)	Non-compliance with labor laws with respect to working hours, wages, social security measures, worker insurance, accident compensation.	All plants and operations	<ul style="list-style-type: none"> HR manual has been developed and implemented to ensure compliances 		Private Security Personnel Code of Conduct	
22)	Absence of procedure for workers to express their grievances.	All plants and operations	<ul style="list-style-type: none"> Providing an open environment for interactions amongst management and workers Worker grievance redress mechanism communicated to all workers 			
23)	Harassment, intimidation, and/or exploitation, especially in regard to women.	All plants and operations	<ul style="list-style-type: none"> Trainings imparted to raise awareness on prevention, prohibition, and 		The Sexual Harassment of Women at	

#	E&S Risks	Applicable to Facility at minimum	E&S Action Plan		E&S Operational Procedures / Policies	
			E&S Actions	Responsibility	E&S Procedure / Policies	Reference to Annex/ Document
			redressal of sexual harassment of women at workplace		Workplace Policy	
24)	Lack of awareness or due diligence of supply chain labor risks in outsourced / contracted processes.	All plants and operations			Contractor Management Processes	
D Community Health & Safety						
25)	Poor ambient air conditions due to fugitive emissions and odour from waste processing activities or storage	CBG-M, CBG-PM, CBG-A, COM, C&D, WtE	<ul style="list-style-type: none"> Will be addressed through the E&S Actions listed under A3 & A10 Ambient air monitoring around the facility 			
26)	Unavailability of groundwater for community use due to groundwater depletion caused by excessive consumption by the Plants	CBG-M, CBG-PM, CBG-A, WtE	<ul style="list-style-type: none"> Will be addressed through the E&S Actions listed under A1 			
27)	Degraded quality of groundwater available to the community due to land contamination by the waste storage causing leaching of contaminants into the ground water aquifer	CBG-M, CBG-PM, CBG-A, WtE	<ul style="list-style-type: none"> Will be addressed through the E&S Actions listed under A7 			
28)	Operations involve air emissions, that may pass on to the surrounding community	WtE	<ul style="list-style-type: none"> Will be addressed through the E&S Actions listed under A3 			
29)	Inadequate fire protection systems or poor maintenance of system to assure life	CBG-M, CBG-PM, CBG-A, COM, WtE	<ul style="list-style-type: none"> Will be addressed through the E&S Actions listed under B12 			

#	E&S Risks	Applicable to Facility at minimum	E&S Action Plan		E&S Operational Procedures / Policies	
			E&S Actions	Responsibility	E&S Procedure / Policies	Reference to Annex/ Document
	and fire safety in the plants					
30)	Increased vehicle traffic around the plants from transportation of waste leading to congestion and risk of accidents	CBG-M, CBG-PM, CBG-A, COM, WtE	<ul style="list-style-type: none"> Training the employees responsible for managing traffic in and around the plants and following good practices for safe driving, road safety and vehicle management 			
31)	Potential threat related to freedom of movement or harassment to public staying around the facility from the Security guards	All plants and operations	<ul style="list-style-type: none"> Engaging reputed security agency for security services that have the requisite licenses and can provide security guards that are well trained in good practices for people management 			

7 E&S Monitoring and Review

7.1 E&S Monitoring of Plants

The monitoring frequency will be based on the categorization assigned to the project after the E&S review and is presented below:

Categorization		Monitoring Periodicity and requirements
B	-	Half yearly monitoring <ul style="list-style-type: none"> • Six-monthly meetings (physical or virtual) with relevant responsible teams from the plant
C	-	Annual monitoring <ul style="list-style-type: none"> • Annual meetings (physical or virtual) with relevant responsible teams from the plant

Note: As a policy, ERMPL will not invest in Category A projects

The monitoring will cover:

- Status of ESAP implementation.
- Status of additional studies, if required.
- Project status.
- Any significant events, serious incidents, and issues at the plant.
- Status of reporting requirements of the local regulatory authorities.
- Community grievances.
- Emerging E&S issues and risks due to change in plant operations, expansion, change in E&S regulations that have material implication on the plant.

The primary responsibility for monitoring of the plant remains with the HSSE Head or his designate. The observations from the monitoring will be recorded in the format provided in **Tool: 7-1**.

7.2 Monitoring of ESAP Implementation

The implementation of ESAP will be periodically monitored by the HSSE Head at ERMPL. The frequency of monitoring of ESAP implementation will be as provided for E&S Monitoring. The observations on status of compliance to ESAP will be recorded in the format provided in **Tool: 7-1** against the ESAP agreed upon.

Where there are gaps in ESAP implementation or delays, the same will be reviewed to determine the root cause. This will be communicated to the plant along with the revised timelines, if required.

7.3 E&S Reporting by Plants

The plants will be required to report on a monthly basis. This will be as per the format provided in the online platform 'UDAPT'.

The Plant's HSE In-charge will ensure that the requisite reporting is done by the plants and check the completeness of the reporting done.

7.4 Reporting of Serious Incidents/accidents

A **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 ERMPL or which occur on or nearby any site, plant, equipment, or facility of ERMPL:

- (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); and
- (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.

In case of any serious accident/incident the plants are required to report to HSSE Head at the Corporate level within 24 hours of its occurrence. The HSSE Head in turn will report to the investors preferably within 48 hours of occurrence of the incident in the required format **Tool: 7-4**.

The plants will also inform the relevant regulatory authorities about the incident as required and applicable. All incidents will be critically evaluated, and actions identified and implemented to avoid / minimize recurrence of similar incidences. Refer to formats in the IMS Manual for Preliminary Incident Report and Detailed Incident Investigation Report.

8 E&S Performance Reporting by ERMPL

8.1 Quarterly Reporting

The supporting data to generate the Key Performance Indicators (KPIs) across various themes will be submitted by the respective plant heads to the EHSS Head on a monthly basis. ERMPL utilizes a software 'UDAPT' to report on these various aspects. The EHSS Head will use these data to generate the KPIs every quarter. These will be used to generate quarterly reports like E&S Impact reports for each type of plant and these will be discussed during the ESG Committee meetings at the Corporate.

8.2 Annual Reporting

The Annual ESG Performance Report of the fund will be prepared by the EHSS Head using the KPIs provided in **Tool: 8-2** and will upload the data on UDAPT platform for the applicable reporting period as required by investors. The report will be compiled with inputs from all the plants, the inputs from Environmental, Health & Safety and Social monitoring, monitoring of ESAP implementation, findings of the E&S appraisals undertaken during the bidding process in the reporting period.

All other external communications will be carried out in accordance with the Stakeholder Engagement Plan (SEP) prepared for each facility using the template provided in **Annex-ESMS: 10-1**.

9 Project Closure

9.1 E&S Risk Assessment in Project Closure

ERMPL plants and operations are undertaken on a long-term basis. The concession periods for most plants are in the range of 25 to 30 years while the operations (like C&T) range from 5 to 8 years. In both cases there are possibility of extensions. However, should a situation arise where the company has to exit the business, it can be through sale of assets or dismantling. This will lead to the situation which is termed as Project Closure.

If an existing plant is decommissioned or dismantled to set up a new plant, this will also be considered as Project closure for the existing plant. Once the project closure is agreed upon, ERMPL will record ESG indicators as per format in **Tool:9-1** (Appendix I: ESG Indicators for Exit of GGEF's ESMS).

For plants, the project closure will also require the company to commission a competent third party for conduct of a phase I Environmental Site Assessment to identify and address any environmental contamination (soil and ground water contamination) that might have occurred during its operations. In case a Phase I Environmental Site Assessment determines a likelihood of site contamination, ERMPL will undertake a Phase II Environmental Site Assessment to collect soil, groundwater, and/or soil vapor samples from the subsurface to analyse for the presence of contamination. The recommendations identified in the Phase II Environmental Site Assessment will be implemented by the ERMPL before the project closure.

The Terms of Reference for Phase I Environmental Site Assessment is presented in **Annex-ESMS: 9-1**.

9.2 Decommissioning or Dismantling

When there is a need to decommission or dismantle an existing plant a detailed risk assessment will be undertaken. Risk assessment will be dependent on the type of plant being decommissioned or dismantled and may include some or all of the following assessment:

- Engineering Assessment – conducted to assess the structural integrity of the plant and to understand the key design characteristics of the structure.
- Electrical Assessment – conducted to identify and mark out the power supply to, and the distribution of power in, the work area.
- Fire Assessment – conducted to understand the fire prevention and control measures required in the dismantling process.
- Asbestos Assessment – conducted to establish the presence, type and distribution of asbestos containing materials.
- General Health and Safety Risk Assessment – to address the impact of the work on surrounding working areas and activities.

The Risk assessment and the plan for dismantling will be undertaken by competent personnel, internal or external to the company. The risk assessment will be considered in developing the decommissioning or dismantling plan.

The company will engage competent contractors to decommission, decontaminate and dismantle the plants. All outputs and records from risk assessments will be made available to contractors or other workers. An indicative listing of probable risks and associated actions that needs to be implemented is presented in **Table 9**.

Table 9: Indicative Risks in Decommissioning or Dismantling and Associated Actions for their Mitigation

#	Potential Risks during Demolition/Decommissioning/ Dismantling	Potential negative impacts/implications	E&S Action Plan
			E&S Actions
1	Generation of large (or significant) quantities of waste	Contamination of ground and/or surface water due to improper disposal of waste generated	<ul style="list-style-type: none"> Develop a Waste Management Plan addressing the potential types of waste generated
2	Disposal of residues and solid waste	Land Contamination	
3	<p>Exposure to physical hazards such as slip trip & falls, cuts grazes & abrasions and collision that could result in body injuries and mental stress.</p> <p>Physical hazard due to falling material</p>	Possible injury, lower productivity, and poor morale amongst staff/labour	<ul style="list-style-type: none"> Ensure the requirements for avoiding slip, trip and falls are adhered to. Ensure a safe system of work is in place and is explained to all operatives and carry out toolbox talks before start of work. Employ a good housekeeping, remove materials from the workplace progressively. At the end of the shift, remove all tools etc. and inspect all areas to ensure they are left in a safe condition. Training and awareness building on general guidelines for working safety
4	Risks to health and safety due to damage to essential services (supply of gas, water, sewerage, telecommunications, electricity, chemicals, fuel and refrigerant in pipes or lines).	Accident or incident leading to injury or fatalities of labour and community	<ul style="list-style-type: none"> All the essential services not required in the demolition process should be shut-off, capped, or otherwise controlled, at or outside the building line before demolition work is started. The utility/service agency involved should be notified in advance and its approval or services, if necessary, should be obtained before demolition work is started. Any service retained for the demolition work should

#	Potential Risks during Demolition/Decommissioning/Dismantling	Potential negative impacts/implications	E&S Action Plan
			E&S Actions
			be adequately protected as required by the relevant authority.
5	Uncontrolled collapse of the building/structure	Possible injury or fatalities to labour	<ul style="list-style-type: none"> • Labour is to be briefed about the sequence of demolition prior to commencement by the site supervisors. • The machine operator shall be fully conversant with the sequence of removal of any support members. • No structures to be left partially collapsed or in an unsafe condition.
6	Exposure to asbestos, hazardous materials, hazardous chemicals, gases, or similarly hazardous substances present at the site	Ill health and medical costs to the labour and community due to- <ul style="list-style-type: none"> - Inhalation of dust and aerosols - Skin irritations and other allergic reactions from dust and chemicals 	<ul style="list-style-type: none"> • Use of appropriate PPE (safety shoes, gloves, respiratory protectors, safety goggles, etc.) • Health check-up
7	Exposure to flying particles, dust, and noise	Ill health and medical costs to labour and community	<ul style="list-style-type: none"> • Use of appropriate PPEs (safety goggles, ear plug, respiratory protectors, etc.) • Dust to be minimized by water sprinkling
8	Exposure to risks of fire, explosion incidents and other emergency incidents	Possible injury or fatalities to labour Loss of reputation	<ul style="list-style-type: none"> • Removal of waste as soon as possible from site to prevent a build-up of combustible material. • Install associated fire infrastructure

#	Potential Risks during Demolition/Decommissioning/ Dismantling	Potential negative impacts/implications	E&S Action Plan
			E&S Actions
9	Obstruction of assigned emergency access/ egress routes movement	Possible injury or fatalities to labour	<ul style="list-style-type: none"> Employ a good housekeeping, remove materials from the workplace progressively and ensuring emergency access/ egress routes are not blocked
10	Exposure to electrical shocks, burns or electrocution	Ill health, mortality, and medical costs to labour	<ul style="list-style-type: none"> Use of appropriate PPE Periodic training on electrical safety
11	Adverse impact on adjacent or adjoining building	Adverse impact on the structural integrity of adjoining building Flooding or water penetration to adjoining building. Adverse impact by vibration or concussion during the demolition process	<ul style="list-style-type: none"> Adequate lateral support for adjoining structures should be provided. Measure to be implemented to stop flooding or water penetration to adjoining building
12	Noise and vibration from dismantling activities	Hearing loss / impacts on workers and nearby population (community)	<ul style="list-style-type: none"> Use of appropriate PPEs Installation of noise barriers
13	Increased vehicle traffic around the demolition site from transportation of C&D waste leading to congestion and risk of accidents	Conflict with local community Loss of reputation	<ul style="list-style-type: none"> Training the employees responsible for managing traffic in and around the plants and following good practices for safe driving, road safety and vehicle management

10 Associated Frameworks

10.1 Stakeholder Engagement Framework

Stakeholders are defined as persons or groups who are directly or indirectly affected by a project¹⁴, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively¹⁵.

Stakeholders of ERMPL will include persons or groups that will have an interest in the company's operations, or have an ongoing relationship with the company and have the ability to influence the company operations. These are a diverse group and comprise of locally affected communities of ERMPL's plants and their formal and informal representatives, national or local government authorities, political leaders, civil society organizations, groups with special interests, media and other businesses.

Stakeholder Engagement is an ongoing process that may involve, in varying degrees, the following elements spanning the entire life of a project/ organization:

- stakeholder analysis and planning,
- disclosure and dissemination of information,
- consultation and participation,
- grievance mechanism, and
- ongoing reporting to Affected Communities.

ERMPL will undertake stakeholder engagement with the following underlying principles:

- **Transparency and Fairness:** The process of engagement will be transparent, in harmony with the local culture and in the appropriate language.
- **Congruence and Materiality:** The engagement activities will be prioritized on the basis of their significance to immediate and long-term interests of the business and/or the stakeholders.
- **Cultural Appropriateness and Inclusivity:** The engagement activities will take cognizance of the cultural norms and practices of the stakeholder groups as well as the differences in social position of the various groups. The process will ensure participation of all groups, especially the vulnerable groups such as women and economically weaker population (as relevant).
- **Consultative and Collaborative:** Stakeholder engagement will be carried out in a consultative and collaborative manner balancing the competing needs and interests of all stakeholders towards ensuring sustainability of project activities and a 'social license to operate'.

¹⁴ As per IFC Performance Standard, "project" refers to a defined set of business activities, including those where specific physical elements, aspects, and facilities likely to generate risks and impacts, have yet to be identified. Where applicable, this could include aspects from the early developmental stages through the entire life cycle (design, construction, commissioning, operation, decommissioning, closure or, where applicable, post-closure) of a physical asset.

¹⁵ IFC Handbook on Stakeholder Engagement, 2007

- **Documenting and Disclosing:** All engagement activities with the stakeholders will be documented, including photographic evidence wherever possible, to make the process more robust through experiences and learnings from engagement activities in previous stages.

Annex-ESMS: 10-1 presents a framework that will guide the stakeholder identification, mapping, analysis and engagement process for ERMPL at the Corporate level that will be applied at the plant level. A plant level Stakeholder Engagement Plan will be prepared based on the framework wherein additional stakeholders may get identified and the mode of engagement and information to be disclosed may accordingly be contextualized.

10.2 Grievance Handling and Redressal Framework

It is important to establish accessible and responsive means for stakeholders to raise their concerns about the project operations/plants throughout their lifecycle. This enables the business to maintain its 'social license to operate'.

The specific objectives of establishing a Grievance Redress Mechanism (GRM) are as follows:

- To put in place a process of receiving, recording and resolving grievances from various stakeholders, in keeping with their unique profiles and socio-economic contexts.
- To ensure that comments, responses and grievances are handled appropriately in a fair and transparent manner, in line with ERMPL's internal policies, international best practice.

The process of grievance redressal will be undertaken in keeping with the following principles:

- **Proportionality:** ERMPL will ensure that if the stakeholder groups affected are diverse, or the impacts on them are severe, the nature of interaction with them commensurate to the same.
- **Trust and Legitimacy:** If any stakeholder lodges a complaint, both verbal and written forms, it will be treated in a fair and objective manner.
- **Cultural Appropriateness:** The grievance redress mechanism is designed to take into account specific cultural attributes as well as traditional mechanisms for raising and resolving issues.
- **Accessibility and Equitability:** The grievance procedure is designed in a manner that is accessed equitably by all stakeholders.
- **Independence, Transparency and Accountability:** ERMPL will demonstrate that they take grievances seriously and are transparent about their process and decision making. In addition, ERMPL will commit to a certain timing of response and resolution of grievances. ERMPL will ensure transparency by keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake.
- **Rights Compatibility:** ERMPL will highlight that the GRM would not be a substitute for, nor should it undermine, a complainant's right to pursue other judicial or non-judicial avenues of remedy.
- **Appropriate Protection:** The precautions to be taken by ERMPL include a clear policy of non-retaliation, measures to ensure confidentiality and physical protection of complainants, safeguarding of personal data collected in relation to a complaint, and an option for complainants to submit anonymous grievances where necessary. The stakeholders will be informed of avenues

to escalate their complaints or grievances, and of their rights to use alternative remedies if they choose to do so without turning to a plant-level mechanism first or if they are not satisfied with the response of the plant operations to their complaints.

The stakeholders of ERMPL that could have grievances and their typical grievances are presented below in **Table 10-1**.

Table 10-1: Stakeholders and Typical Grievances

Stakeholder	Typical Grievance
Equity Investors/Lenders	<ul style="list-style-type: none"> • Business not in alignment with environmental and social safeguards among other requirements. • Delay in reporting serious incidents/accidents
Customers of Recycled Products	<ul style="list-style-type: none"> • Supply of adulterated and/or poor-quality products • Delay in supply of products
Neighbouring Community	<ul style="list-style-type: none"> • Depletion of groundwater due to over consumption by the plants • Degradation of surrounding waterbodies due to improper disposal of wastewater • Land contamination due to treatment residue disposal • Nuisance of odor due to release of ammonia from waste • Excessive emissions from process operations and vehicles impacting community property and health. • Absence of a community grievance redress mechanism • Unaware about high-risk operations and actions to be taken in case of emergency situations
Workers (including on-roll, contract, and casual labour)	<ul style="list-style-type: none"> • Improper working conditions such as unsafe workplace, unrealistic deadlines, lack of understanding with management etc. • Irrational management policies such as unpaid overtime, transfers, demotions, inappropriate salary structure, etc. • Discrimination and Intimidation / harassment at workplace • Violation of organizational rules and practices • Absence of procedure
Contractors	<ul style="list-style-type: none"> • Improper working conditions such as unsafe workplace, lack of understanding with management, etc. • Contract terms violation • Delays in activities
Suppliers/Vendors	<ul style="list-style-type: none"> • Contract terms violation • Delays in activities
Regulatory Authorities	<ul style="list-style-type: none"> • Absence of applicable permits and approvals • Delay in obtaining periodic permits and approvals
Media Organizations	<ul style="list-style-type: none"> • Violation in operating within the regulatory framework.
NGOs	<ul style="list-style-type: none"> • Absence of a robust grievance redress mechanism.

The personnel engaging with customers and community around ERMPL’s plants will be trained to address grievances. The training will comprise of:

- Expected behaviors and accepted practices when interacting with stakeholder groups in order to avoid a grievance in the first instance.
- Routes available for stakeholders to lodge a grievance.
- Roles and responsibilities for handling and resolving grievances (including key internal and external stakeholder contacts).
- Recording and tracking procedures

A Grievance Handling Committee will be constituted to conduct periodic review meeting to evaluate the effectiveness of Grievance Handling procedure and its implementation process. The Committee will be chaired by the HR Head and other 4 to 6 Functional Heads including EHSS Head at the Corporate level. The Committee will meet on a quarterly basis for this purpose.

Annex- ESMS: 10-2 presents the Grievance Redress Mechanism for external stakeholders of ERMPL. The stakeholders will be made aware about the grievance redress mechanism. The grievances received will be recorded using **Tool 10-2** and actions will be taken as per the procedure provided in **Annex- ESMS: 10-2**. The grievances will also be analysed and discussed during Management review Meetings.

10.3 Emergency Preparedness and Response Framework

ERMPL maintains Emergency Preparedness and Response related Plans at every plant for its operations. The plans address identification of types of accidents and emergency situations may occur, giving due considerations to the area that may be impacted, communities and individuals who may be impacted, and detail out the response procedures, provision of equipment and resources, designation of responsibilities, communications and periodic training requirements to ensure effective response. The Plant Head(s) (or the Emergency Controller) ensure that the plant under their purview have the plans for Emergency Preparedness and Response for the possible emergency scenarios relevant to the facility. The Plant Head(s) will be guided by the procedure on developing emergency preparedness and response plans (refer **Annex-ESMS: 10-3 and Tool 10-3/A**). The prime objective of the emergency response plans is to ensure that the activities are carried out in the following priorities:

- Safeguarding lives
- Protecting the environment
- Protecting company and third-party assets
- Maintaining company image and reputation

The Plant Head ensure sufficient and qualified resources (human & financial) are allocated on an ongoing basis to achieve effective implementation of actions, measures, and monitoring activities as directed under the Plan.

The HSSE In charge(s) (or the Emergency Coordinator) ensure that the plans so developed are current at all times and suitably address any modifications or changes in the plant at any given point of time. The Admin In charge(s) will ensure that the emergency response infrastructure is routinely maintained and are functional should there be a situation to respond to an emergency. The Unit HR Head will ensure that all workers are adequately trained to respond to an emergency.

All plant personnel will be mandatorily communicated with the requirement of complying with the directions related to emergency preparedness, evacuation procedures, and response procedures.

The effectiveness of the plans will be periodically tested through conduct of mock drills every six months. Refer the **Tool 10-3/B** for Observation Sheet for Mock Drills.

10.4 Resource Efficiency and Management Framework

This framework outlines the approach to be established and implemented for achieving resource efficiency in the operations of ERMPL's plants. E&S operational procedures will include technological / operational control/ competence / measurement & monitoring measures.

The key objectives of the framework will be to:

- Manage key resources used in the operations.
- Improve resource efficiency.
- Promote sustainable use of resources (energy, water).
- Reduce asset level emissions; and
- Set measurable targets and measure progress.

Refer to **Annex- ESMS: 10-4** for the detailed framework. Refer to **Tool 10-4** for Resource Efficiency Opportunity Tracker.

10.5 Supply Chain Management Framework

As part of the business operations, ERMPL procures raw materials like cement, reinforced and structured steel, plant & machinery, diesel, consumables, and other repair & maintenance items from multiple vendors/suppliers.

The Company intends to influence the vendors/suppliers to operate with ethical conduct in engaging their workforce and in usage of natural resources. The existing procurement policy of ERMPL intends to incorporate in the future a 'Vendor Onboarding Policy' and 'Detailed EHS Policy' in all its contracts. This will also assist in monitoring the vendors/suppliers for applicable compliances.

ERMPL expects the vendors to be minimally in adherence to the legal requirements stipulated. In order to address E&S risks across the lifecycle of a project, ERMPL will identify and outline the minimum E&S requirements that will be expected of the vendors/suppliers and his personnel while carrying out activities for ERMPL. Refer to **Annex- ESMS: 10-5** for the procedure that is applicable to all plants and operations of ERMPL that directly engage with vendors/suppliers.

The vendors/suppliers will also be monitored on an annual basis or at the time of renewal of the agreement to ensure that vendor/supplier is consistent in meeting ERMPL's technical, financial and E&S requirements. In order to manage the risks emerging from the supply chain, the Company has developed a Supplier Code of Conduct (SCoC) that will be applicable to all suppliers/vendors engaged by the Company.

11 Organizational Capacity and Competency

11.1 Institutional Arrangement for ESMS Implementation

The implementation of the ESMS descends from the Corporate to the plant level. The Corporate ESMS guides the activities undertaken by the plants to ensure continual improvement in E&S performance. For the ESMS implementation, specific roles and responsibilities have been vested with specific committees and personnel. The Organization Structure in the context of ESMS implementation is presented in **Figure 2-1**.

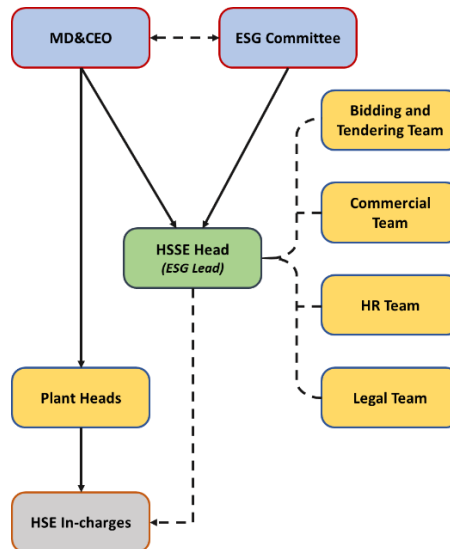


Figure 11-1: Organogram for Implementation of ESMS

The **MD & CEO** of the Company assumes overall accountability with respect to the E&S performance of the Company on behalf of the Top Management. An ESG Committee is constituted that is responsible for supporting decision making on ESG matters.

A **HSSE Head** has been appointed at the Corporate who leads ESMS operationalization. The HSSE Head, supported by the HSE team coordinates ESMS implementation across all plants. The HSSE head will be the ESG lead for ERMPL.

Plant Head is in charge of the overall operations of the plant. The Plant Head reports directly to the MD & CEO. On issues related to health, safety and environment (HSE), the Plant Head is supported by an **HSE In charge** at the plant level who oversees the activities undertaken for the E&S performance management. The HSE In charge reports to the Plant Head as well as the HSSE Head at the Corporate. The HSSE Head at the corporate level is being assisted by other relevant departments such as Bidding & Tendering Team and Commercial (including land aggregation and major contracts). Both the HSSE Head and the HSE In charge(s) at the plant levels are supported by Human Resource, Legal etc. on relevant matters.

Further, ERMPL may engage services of an external E&S Consultant to support their teams in implementing the ESMS procedures, conduct of E&S Due Diligence, and E&S audits. HSSE Head and

team will work closely with all relevant teams to ensure that procedures under the ESMS are understood and implemented.

11.2 Roles and Responsibilities under ESMS

11.2.1 MD & CEO

The MD & CEO is the approving authority of the ESG Policy and assumes overall accountability with respect to the E&S performance on behalf of the top management of ERMPL.

Responsibilities of MD & CEO

- Approval of ESG policy and ensure its implementation.
- Maintain oversight on the implementation of the ESMS.
- Ensure availability of adequate resources (human, technological and financial) to enable effective functioning and continual improvement of the ESMS.
- Suitably address any grievance arising from the plants with regard to concerns on E&S issues, when escalated.

11.2.2 ESG Committee

In order to oversee and facilitate the implementation of the ESMS, an apex committee has been constituted at the corporate level. The committee identified as the ESG Committee is chaired by an Independent Director and comprises of representation from EverSource Capital and ERMPL's key departments. The constitution of the ESG Committee is as follows:

- | | |
|---|--|
| 1. Representation from EverSource Capital | 6. Business Development (BD) Head |
| 2. MD & CEO | 7. Commercial Head |
| 3. Chief Operating Officer (COO) | 8. HSSE Head |
| 4. Chief Financial Officer (CFO) | 9. Human Resources Head |
| 5. Company Secretary (CS) | 10. Industrial Relations (IR) & Admin Head |
| | 11. Legal Head |

The key functions of the ESG Committee are as follows:

- Review the ESG Policy's continuing suitability and effectiveness periodically.
- Provide leadership in management of E&S risks of the new projects.
- Review the activities under the ESMS at least half yearly.

The ESG Committee will be meeting half yearly and if situation warrants, additional meetings may be held as and when required. The conduct of the meeting will be as per **Section 12.2** of this ESMS document.

11.2.3 HSSE Head

HSSE Head coordinates on the ESMS implementation across the organization. HSSE Head is the direct liaison between the plants and the Corporate on E&S matters. S/he is the focal point for all ESMS related activities across ERMPL's plants and operations.

Responsibilities of HSSE Head

- Lead the implementation of the ERMPL's E&S strategy including policies, programs, procedures, and monitoring mechanisms.
- Coordinate and assist in the meetings of the ESG Committee.
- Work closely with the ERMPL project development teams and project teams to ensure that all projects are developed, constructed and operated with adequate consideration for E&S matters.
- Maintain oversight on emerging E&S risks in the waste management business and plan for suitable management measures.
- Screening and providing early guidance and feedback on E&S issues associated with new prospects.
- Ensure the process of E&S risk assessment in bidding process is effectively conducted.
- Undertake and manage advisors for preliminary E&S Risk Assessment of potential projects and ESDD/ESIA of projects in pre-construction phase of projects.
- Coordinate and maintain oversight on third party consultants appointed for conducting ESDD and ESIA of newly awarded projects.
- Ensure and undertake with support from the Operations Team, periodic monitoring on implementation of the E&S actions (E&S monitoring and ESAP implementation) for the new projects and obtain reporting on E&S aspects as per requirements of the ESMS.
- Provide technical support and assistance to all teams in relation to E&S matters and risk mitigation; Responsible for assisting compliance with all applicable regulations.
- Organize ESMS implementation audits every year.
- Coordination and support across the ERMPL plants to help identify best practices, procedures and other programs that will assist ERMPL meeting its goals and objectives.
- Facilitate training activities on aspects related to the ESMS for existing and new members who join the ERMPL team with support from HR Head.
- Facilitate periodic training sessions as required to communicate ERMPL's ESG Policy and ESMS requirements.
- Present the findings of monitoring of ESMS to the ESG Committee and MD & CEO.
- Coordinate and prepare quarterly and annual E&S Reports to GGEF as required.
- Where required, ensure, and undertake E&S assessment during exit from investment

11.2.4 HSSE Team

The HSSE Team will assist the HSSE Head and provide support to plants on all E&S related matters of ERMPL. The team ensures that all activities undertaken consider the ESMS requirements and such requirements are internalized in the day-to-day operations of the plants.

11.2.5 Team Specific Responsibilities

a) Bidding and Tendering Team

- Participate in Environmental, Social and Safety (ESS) Screening and Preliminary E&S Risk Assessment collaborating with HSSE team in order to prepare a project risk matrix for potential projects.
- Coordinate with the HSSE team for site visits and prepare site visit reports.

b) Commercial Team

- Participate in Environmental, Social and Safety (ESS) Screening and Preliminary E&S Risk Assessment collaborating with HSSE team in order to prepare a project risk matrix for potential projects.
- Ensure identification of potential project risks especially related to land during the bidding process.
- Carrying out the E&S risk assessment related to land aspects during the site visit along with B&T and HSSE Team.

c) HR Team

- HR Head and the team coordinates training needs assessment and develop training modules on ESMS procedures and implementation in consultation with HSSE Head.
- Conducts regular training to ensure ESMS training and capacity building requirements are met.

d) Legal Team

- The legal team will ensure that the appropriate E&S regulatory requirements are being considered for new projects and analyse the legal implications.

11.2.6 Plant Head(s)

Plant Head maintains oversight and implementation of ESMS procedures at the plant level.

Responsibilities of Plant Head

- Provide leadership in management of environmental and social aspects of the plant.
- Ensuring that plants are managed in a manner which gives adequate focus to the E&S aspects.
- Facilitate availability of adequate resources like human, technological and financial to enable effective functioning and continual improvement of the ESMS.
- Provides support to HSE In-charge in the implementation of ESMS at the plant level.
- Communicate and report to MD & CEO on E&S matters.
- Report any major accidents to the MD & CEO and the HSSE Head.

11.2.7 HSE In-charge(s)

HSE In-charge ensures the roll out of the ESMS elements at their respective plants and undertakes the monitoring and measurement of E&S indicators.

Responsibilities of E&S In-charge

- Implementation of tools, checklists and processes under the ESMS as relevant to their plants.
- Carrying out plant level E&S risk assessments and keeping them up to date at all times.
- Ensuring training of workers and employees, contractor workforce etc. are routinely conducted as per the agreed plan.
- Ensuring incident reporting and investigations.

- Communication and reporting to the Plant Head and HSSE Head at the Corporate on E&S matters.
- Present the findings of monitoring of E&S indicators to the Plant Head.
- Support the HSSE Head in ensuring routine conduct of ESMS audit and any other E&S matter, when called upon.

11.3 Training and Capacity Building

ERMPL ensures that any person(s) that have the potential to cause significant E&S risks and impact(s) identified by the Company are competent based on appropriate education, training, or experience, and retains associated records.

ERMPL ensures that all persons performing tasks for it or on its behalf at each relevant function and level are aware of:

- ERMPL's ESG Policy
- The importance of conformity with the ESG Policy and Procedures of the ESMS
- The significant environmental aspects, OHS consequences and related actual or potential impacts associated with their work activities, other social aspects related to non-discrimination, equality, grievance redressal, etc.
- Their roles and responsibilities in achieving conformity with the requirements of the ESMS.
- The potential consequences of departure from specified procedures

11.3.1 Training Need Assessment

ERMPL will identify training needs associated with E&S aspects related to its operations as well as for ESMS implementation. Once the training needs are identified, training materials will be developed (targeting learning needs of different categories of workforce) and will provide training or take other action to meet these needs and will retain associated records.

Apart from the induction training, other trainings are based on training need assessment at the Corporate / business level. The training need assessment includes Job Specific Training. Job specific training is imparted prior to starting work on a new job which covers amongst other topics related to E&S issues of the business operations and more specifically related to their respective work areas. Indicative training modules in addition to the below-mentioned trainings (sub-section 11.3.2) will include (not limited to):

- Office Safety
- Defence Driving
- Electrical Safety
- Mock Drills
- Work Permit System
- First Aid
- Health & Safety Legal Information
- Material Handling Safety Awareness
- Hot Work Safety Awareness
- Workplace Safety Awareness
- Traffic Safety Awareness
- HIRAO
- Integrated Management System
- Labour Laws

Also, for workers and contract personnel involved in activities having significant aspect and / or intolerable OHS hazards and risks additional training needs are identified based on the competency requirements. Based on these needs, specific competency improvement training is conducted as and when required.

ERMPL ensures competency of their personnel involved in implementation of ESMS as per roles and responsibilities defined under this ESMS. For this training (and refresher trainings) in the following areas (but not limited to) is conducted:

- Identification of Environmental, OHS, LWC and Community Risks and Impacts
- Potential Project E&S screening and Risk Assessment Framework
- Safe work procedures and consequences of not following procedures.
- Resource conservation practices
- Management Programs
- Personal Protective Equipment
- Work Permit System
- Incident Reporting and Investigation
- Grievance Redressal Mechanism
- Emergency Preparedness and Response
- Procedure for Internal Audit

11.3.2 Induction and Refresher Trainings

Ongoing induction and refresher training to all managers and workers, including full-time, part-time, temporary and contract (as applicable to the respective plants) will be conducted. The E&S aspects of the business and those related to concerned plants will also be covered during these training sessions. Following is a list of minimum training that will be conducted covering the various stakeholders of the plants and at the corporate level.

Table 11-1: Induction and Refresher Trainings

Broad Training Modules	Frequency	Applicability			
		Functional Heads	Corporate HSSE Team	Plant HSE Team(s)	Employees, Workers & Drivers
ESMS					
ESG Policy	Annually	☑	☑	☑	☑
ESMS Implementation	Half Yearly*		☑	☑	
E&S Risks and Impacts	Half Yearly*	☑	☑	☑	
ESMS awareness	Half Yearly*				☑
Grievance Redressal Mechanism	Half Yearly*		☑	☑	
Environmental, Health and Safety					
Checklists and Procedural Guidance	Half Yearly		☑	☑	☑ (Relevant to work areas)
EHS Awareness	Half Yearly		☑	☑	☑
Fire Safety	Half Yearly		☑	☑	☑

Broad Training Modules	Frequency	Applicability			
		Functional Heads	Corporate HSE Team	Plant HSE Team(s)	Employees, Workers & Drivers
Emergency Preparedness Response Plan	Quarterly		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Incident Reporting and Investigation	Quarterly		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
HR					
Induction Training	Annually		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	All New Employees
POSH	Half Yearly		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
HR Policy Refresher Training	Annually			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**It is recommended that ESMS trainings are conducted half yearly for the first 2 years of ESMS implementation. After 2 years, the frequency may be reduced.*

11.3.3 Annual Training Calendar

Depending on the specificity of the plants and the inputs received from the training needs assessments, a consolidated annual training calendar will be maintained at each plant. The training will be identified for the different stakeholder groups and designed considering the competency needs and the risks faced by the respective stakeholder groups. Same will also be done for the corporate office.

The trainings imparted will be tracked and records for the same will be maintained.

11.3.4 Modes of Training

Training assumes different formats at ERMPL. Following are some of the formats:

- Classroom training on certain topics requiring longer duration where the team needs to understand concepts.
- Web-based training.
- Job-specific training near the work area before the start of the activity, especially for activities where work permits have been issued.
- Demonstrative training such as fire drills, operations of fire extinguishers, fire hydrants and first aid, etc.

11.3.5 Toolbox Talks

- Toolbox Talks to be conducted for about 15 minutes each morning on any E&S related topic for all those workers working in operations involving significant risk. The HSE In-charge at the plant level has the discretion to decide and schedule toolbox talks on topics related to health & safety, PPE, work permit system etc.
- Records of these toolbox talks to be maintained at the plant(s).

11.3.6 Trainers

- ERMPL to conduct various training programs on specific aspects related to the E&S aspects and the ESMS. Training can be conducted internally by employees with knowledge of E&S

issues and externally where required, based on expertise in order to positively impact the E&S performance of the Company.

11.3.7 Training Records

The following records relevant to training and capacity building are maintained:

- Records of conduct of general and team specific training (training content, training attendance sheets etc.) covering induction and refresher programs.
- Feedback from the participants and actions proposed (where required).

12 ESMS Review

12.1 ESMS Implementation Audit

Besides the KPIs, monitoring of E&S Procedures implementation, developed under the ESMS will be conducted at the plant level. This will be assessed through internal audits. The HSSE Head will be responsible for planning and execution of Internal ESMS Audits. The audit process will include:

- Annual ESMS audit schedule will be prepared covering all plants.
- The audit will be conducted by auditors selected from within the Company and trained but not working in the plant audited.
- The auditors will review the relevant documents and familiarize themselves with relevant procedures applicable to the business to be audited. The auditors may prepare specific audit checklists applicable to their audit scope.
- The audit tools may consist of interviews, examination of documents/records and walk-through surveys but the choice of tools will be left to the auditor's discretion.
- Prior to closing the audit, the auditors will discuss and agree with the person responsible on the corrective actions and the timelines for their implementation.
- The auditors will compile the audit findings and submit them to the HSSE Head. The HSSE Head, in turn will compile the overall report of internal audit and present it to the ESG Committee.
- The audits may be conducted along with the IMS audits.

Refer **Annex-ESMS: 12-1** for an indicative E&S Internal Audit Checklist at the plant level. **The ESMS Audit will be conducted at each plant once a year.** For the conduct of internal audits, a team of auditors will be trained in ESMS auditing. The Company may also employ external auditors with experience of ESMS audits and understanding of the plants for carrying out the internal audit.

The audit findings will be documented, and a Corrective and Preventive Action (CAPA) will be developed defining the actions to be taken to address the findings with allocated responsibilities using **the Tool 12-1**. The audit findings will be presented to the ESG Committee.

12.2 Management Review

The Management Review will be conducted by the ESG Committee on a half yearly basis. If situation warrants, additional meetings may be held as and when required.

The HSSE Head will be responsible for reporting to the ESMS Committee on the performance of the ESMS, setting the agenda, ensuring timely management review, providing backup information, preparation, and circulation of minutes of meetings and follow-up actions decided in the meeting. The agenda will include (but not limited to):

- Review of actions decided in the previous meeting.
- Discuss possible adjustments in risk assessment.
- Review compliance with environmental and labour laws and regulations

- Reporting of occupational accidents and incidents
- Result of periodic inspection of plants
- Review results of monitoring of key E&S performance indicators
- Review of ESMS audit findings
- Review progress of management programs
- Review requirement for resources
- Review of emergency mock drills conducted.
- Review of incident and emergency situations
- Review stakeholder communications and community grievance redressals
- Recommendation for improvements

All items discussed and decided in the ESMS Committee Review Meeting will be recorded. The minutes of the review meeting will be approved by the Chair of the Committee and communicated to all concerned.

13 Document Control

13.1 ESMS Controlled Documents

The ESMS of ERMPL comprises of the following document structure that will be controlled by the HSSE Head at ERMPL:

- 1. ESG Policy**
- 2. E&S Management System Manual**
- 3. Annexes**
 - Annex 3-1 Part A and Part B: Summary of EHS Regulations
 - Annex 3-1 Part C: Summary of Social, Worker and Labour Regulations
 - Annex 3-1 Part D: Summary of Waste Handling and Management Policies & Notifications
 - Annex 3-2: Institutional Investor Safeguards
 - Annex 4-4-1: Exclusion List
 - Annex 4-4-5-1: ToR for conducting ESDD
 - Annex 4-4-5-2: ToR for conducting ESIA
 - Annex 5-1: Environmental Risk Evaluation Procedure
 - Annex 5-2: Occupational Health and Safety Risk Evaluation Procedure
 - Annex 5-3: Labour and Working Conditions Risk Evaluation Procedure
 - Annex 6-4: Community Risk Evaluation Procedure
 - Annex 5-2-1: ToC of Contractor Environmental & Social Management Plan
 - Annex 9-1: Terms of Reference for Phase I Environmental Site Assessment
 - Annex 10-1: Stakeholder Engagement Plan
 - Annex 10-2: Grievance Redress Mechanism for external stakeholders of ERMPL
 - Annex 10-3: Guidance for Emergency Preparedness and Response Plans
 - Annex 10-4: Resource Efficiency and Management Framework
 - Annex 10-5: E&S Requirements to be followed by Vendors/Suppliers
 - Annex 12-1: E&S Internal Audit Checklist
- 4. Tools**
 - Tool 4-4-1: Exclusion List E&S Screening Checklist
 - Tool 4-4-2: Environmental, Social & Safety Screening Criteria for Project Site
 - Tool 4-4-3/F1: Preliminary E&S Risk Assessment
 - Tool 4-4-3/F2: Detailed Site Visit Report
 - Tool 4-4-4: E&S Categorization Checklist
 - Tool 4-4-6: E&S Action Plan
 - Tool 5-1: Environmental Aspects & Impacts Evaluation Format
 - Tool 5-2: Occupational Health & Safety Risk Evaluation Format
 - Tool 5-3: Labour and Working Conditions Risk Evaluation Format
 - Tool 6-4: Community Risk Evaluation Format
 - Tool 7-1: E&S Monitoring & ESAP Implementation Format
 - Tool 7-4: Accident/Incident Reporting

- Tool 8-2: Annual Reporting of ESG Performance
- Tool 9-1: ESG Indicator for Project Closure
- Tool 10-2: Plant Grievance Register
- Tool 10-3/A: Emergency Preparedness and Response Planning
- Tool 10-3/B: Observation Sheet for Mock Drills
- Tool 10-4: Resource Efficiency Opportunity Tracker
- Tool 12-1: Internal Audit Findings and Corrective and Preventive Action
- Tool 13-2: History of Revisions

13.2 Update of ESMS

The updates to the ESG Policy and ESMS will be carried out under the following circumstances:

- External changes such as the national laws and regulations and international E&S safeguard requirements.
- A need to update the procedures owing to internal changes.

The responsibility for updates will lie with the HSSE Head at Corporate Office. All revisions to the ESMS will be recorded in the system to preserve the history and reasons for the change (refer **Tool 13-2**). The frequency of update may vary subject to materiality of the item demanding updating.