

Environmental and Social Policy and Management System Procedures (ESMP)



Data Solutions Private Limited

Quadrant-4, 2ND Floor, Cyber Towers,
Hitech City, Madhapur, Hyderabad,
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Prepared By



Taking Responsibility with Smile

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0 PREFACE

0.1. Introduction of the Organization

Induz Data Solutions Private Limited is a start-up in the business of providing Software as a Service (SaaS) based single integrated solution complementing all confidential computing interactions, like user management, storage, and selective data delivery. It helps enterprises achieve the primary goal of confidential computing, which is to remove dependency on platforms and provides security on multi-cloud, hybrid, and edge computing scenarios, thereby ensuring that customers are the sole owners of their digital assets and their workload, and the respective interactions are confidential throughout the lifecycle. The business model includes subscription to Confidential storage, Confidential IAM, and Confidential data delivery.

Induz Data Solutions is founded and run by passionate data security enthusiasts with extensive experience in the field. Recognizing a significant opportunity in the industry, Induz is committed to pioneering a genuinely zero-trust solution. Induz's vision is to alleviate the security burden from cloud providers and liberate data owners and enterprises from added security responsibilities. Induz's journey is fuelled by the ambition to deliver a solution that stands true to the ethos of zero trust – offering peace of mind and reliability in an increasingly digital world.

There will be no usage of technology developed and/or deployed by Induz currently envisaged for any sector listed in the negative list of IFC, ADB, AIIB, NIIF, or YourNest.

0.2. Site Description & Office setup

Induz operates out of a leased office space in Quadrant-4, 2ND Floor, Cyber Towers, Hitech City, Madhapur, Hyderabad, Telangana, India – 500081. The Site is a shared office space with other companies working on a free desk concept and hence there is no fixed layout of the office.

It is registered under The Telangana Shops & Establishments Act, 1988 and Telangana Shops & Establishments Rules, 1990 vide registration # SEA/MED/JCL/RR/0918783/2024 dated 01 August 2024. Its scope includes IT, ITES, AND SOFTWARE SUPPORT SERVICES IT" in this Shops and Establishment registration.

The organization has taken a sub-lease for 15 seating positions + 1 cabin + access to conference hall from a primary tenant that has leased 36 Workstations, 4 cabins, 1 Conference Hall, 1 server room, 1 Management office 1 storeroom from the main service provider.

A picture of the office area is shown below:



Figure 1: A view of the overall office area allocated to Induz

0.3. ESMP and its relationship with relevant ESG frameworks

This ESMP is prepared from the report of ESDD assessment conducted earlier with respect to the following reference framework:

- Applicable local, national, and international laws and regulations pertaining to the Environment & Social and Labor related aspects in India.
- International Finance Corporation's Environmental & Social (E&S) Performance Standards Framework (2012).
- Environmental and Social Management System (ESMS) - YourNest Innovative Products VC Fund III Ver 2.2 dated 25-May-23.
- National Investment and Infrastructure Fund Limited (NIIFL) Environment and Social Management policy and ESMS principles
- World Bank Group's Environmental, Health & Safety Guidelines – General Guidelines (2007).

- Asian Development Bank (ADB) Safeguard Policy Statement (2009)
- Asian Infrastructure Investment Bank (AIIB) E&S Standards (2016)
- ADB Gender & Development Policy (2003)
- ADB Social Protection Strategy (2001)
- New Development Bank Environment and Social Framework V4 dated 11 March 2016.
- The National Cyber Security Policy (2013)
- Information Technology (IT) Act (2000)

0.4. Risk Analysis for Environment and Social (E&S) Categorization under relevant ESG frameworks

As per Annexure D of ESMS- YourNest Innovative Products VC Fund III Ver 2.2 dated 25-May-23 , the project falls under Category C - Business activities with minimal or no irreversible adverse environmental or social risks and/or impacts as per YourNest ESMS and that of other LLPs.

Details of Risk Analysis of the same are present in Annexure 2

0.5. Structure of ESMP

The structure of ESMP and its linkage to requirements of IFC PS is given in the *Table 1*

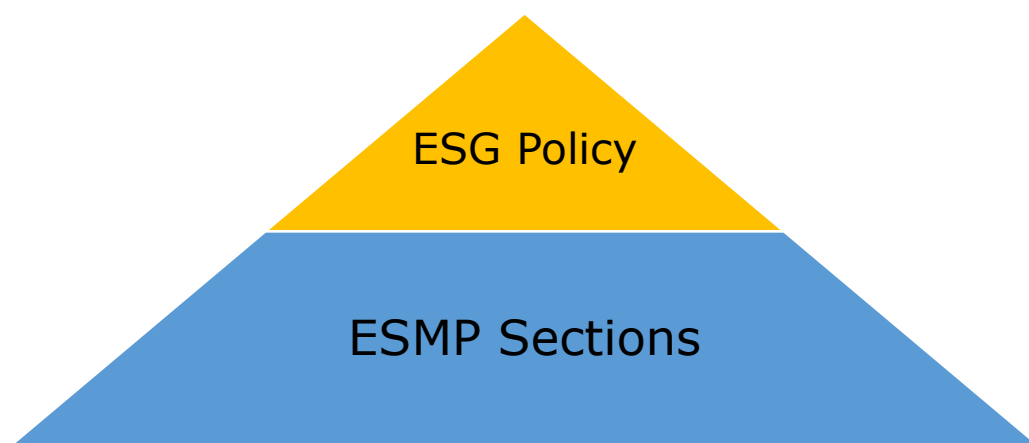
ESG Policy Statement and Other Associated Policies							

Table 1 Linkage of Elements of ESMP to Requirements of IFC

Requirement of the Standard	IFC	Documentation Reference (s)
Applicability Analysis of IFC Performance Standards	PS1	Section 0.1 and Annexure 1 of ESMP
About Induz	PS1	Section 1 of ESMP
Risk Categorization	PS1	Section 3 of ESMP
ESMP Documentation including Control of Documented Information	PS1	Section 4 of ESMP
ESMP Policy	PS1	Section 5 of ESMP
Scope	PS1	Section 2 of ESMP
Environment, Health, Safety and Social Risk Assessment	PS1, PS2	Section 6 of ESMP
Compliance Obligations	PS1	Section 7 of ESMP

Requirement of the Standard	IFC	Documentation Reference (s)
Resources including People and Infrastructure	PS1	Section 9 of ESMP
Competence Awareness and Training	PS1	Section 10 of ESMP
Communication including Stakeholder Engagement, Grievance Redressal, Customer Complaint Management	PS1	Section 11 of ESMP
ESMP Objectives and Planning	PS1	Section 8 of ESMP
Employment, working conditions, wages, POSH, right of association & collective bargaining	PS2	Induz HR Policy handbook
Supply Chain Management including Contractor Management	PS2	Section 12 of ESMP
Office Safety Management	PS1	Section 12 of ESMP
Office Waste Management	PS2, PS3	Section 12 of ESMP
Emergency Preparedness and Response Plan	PS3	Section 13 of ESMP
Monitoring and Measuring Resources, Internal Audit and Management Review	PS1	Section 14 of ESMP
Nonconformance and Corrective Actions	PS1	Section 15 of ESMP

The structure and detailing of documentation are based on the risk characterization, the size and spread of the organization and its current activities, products and services as explained above. The overall ESMP Documentation is categorized into two levels as indicated in the figure below,



This ESMP documentation should be read in conjunction with the list of sections and procedures given below to meet the requirements of relevant ESG Frameworks.

This documentation shall be reviewed based on the experience of implementation after a period of twelve months or the change of scope attracting revision in the categorization.

The record keeping of the documents and the ownership of the same is listed in *Annexure 8*

Table 2: List of Sections of ESMP

Procedure/Framework Designator	Title	Responsibility
ESMP Induz SECTION 5	Environment and Social Policy	CEO
ESMP Induz SECTION 6	Environment, Health, Safety and Social Risk Assessment	CEO
ESMP Induz SECTION.7	Compliance Obligations	CEO
ESMP Induz SECTION 8	ESMP Objectives and Targets and Management Programs	E&S Manager
ESMP Induz SECTION 9	Resources	CTO / HR
ESMP Induz SECTION 10	Organizational capacity and capability	CTO / HR
ESMP Induz SECTION 11	Consultation and Communication	CEO
ESMP Induz SECTION 12	Operational control including SCM and Contractor Management	CTO / Procurement
ESMP Induz SECTION 13	Emergency Preparedness and Response	E&S Manager
ESMP Induz SECTION 14	Monitoring & Measurement, Internal audits and Management Review	E&S Manager
ESMP Induz SECTION 15	Corrective actions	E&S Manager
Induz HR Policy Handbook	Employment, working conditions, wages, POSH, right of association & collective bargaining	HR Manager

1 INTRODUCTION – ABOUT INDUZ

1.1 Evolution of Induz

The evolution of and the plans for the near future are captured in the table below:

Table 3 Evolution of Induz

Year	People	Products / Activity	Type of Product	Linkage to Round of Funding
2023	Started by current CEO & CTO as the cofounders. The company has currently 4 other employees that are working in MTS	Confidential Storage, Delivery & IAM Platform	Software	Prior to the current round of Funding
Dec 2024		MVP (Minimum Viable Product) without Certification	Continuation of product	Post current funding
Mar 2025		MVP with Certification	Continuation of product	Post current funding
May 2025		Paid POC (Proof of Concept)(Confidential Storage)	Continuation of product	Post current funding
Aug 2025		Paid POC (Proof of Concept) for (Confidential IAM)	Continuation of product	Post current funding
December 2025		Early Customers (Confidential Storage and IAM)	Continuation of product	Post current funding

Source: Discussion with CEO and CTO

1.2 Products, Services, Customers and Value Chain

The Organization has the following products as given in the Table below.

Table 4. Products, Services Customers and Value Chain

SAAS Based Software Products				
S No	Product Name	Description of application	Customer	Suppliers and/or Partners
1	Confidential Storage, Delivery & IAM Platform	Security of data in cloud storage	Potential customers in Financial, Banking, Healthcare sectors.	None
Hardware products				

SAAS Based Software Products				
S No	Product Name	Description of application	Customer	Suppliers and/or Partners
1	Route of Trust	Acts as a route of trust for the SaaS running in the cloud.	Potential customers in Financial, Banking, Healthcare sectors.	One supplier for hardware, yet to be identified.

Source: Discussion with the CEO and CTO of the company

The manufacture of the hardware is outsourced. The required chip is planned to be imported and assembled onto off the shelf PCBs at an external supplier. Induz does not intend to get into hardware manufacturing.

The following picture depicts the proposed value chain of the organization

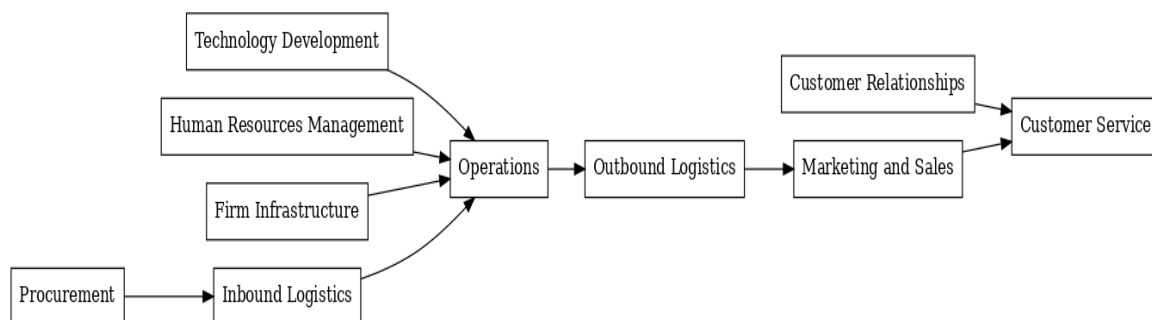


Figure 2 Proposed value chain

Induz performs to deliver its Zero Trust Storage, IAM, and Tokenization services to enterprise customers, SMEs, and consumers. Here's a detailed proposed value chain that reflects the operations and strategic priorities of :

Inbound Logistics

- **Supplier and Technology Partnerships:** Establishing relationships with technology providers like Intel (for SGX), cloud providers (Azure, etc.), and other security technology vendors.
- **Resource Acquisition:** Procuring necessary hardware, software, and cloud resources to deliver secure storage and IAM (Identity & Access management) services.
- **Data Integration and Management:** Handling the acquisition and management of customer data, ensuring it is securely stored and managed from the outset.

Operations

- **Development of Zero Trust Solutions:** Zero trust solution security is a cloud security model that assumes no one is trusted by default, whether they are inside or outside of an organization's network. Building and continuously improving

Induz's core offerings, including Zero Trust Storage, IAM, and Tokenization services. This involves R&D, software development, and testing.

- **Deployment and Configuration:** Customizing and deploying solutions for different customers, ensuring they are correctly configured to meet specific security requirements.
- **Service Management:** Ongoing management of services, including monitoring, updating, and maintaining the solutions to ensure they remain secure and effective.

Outbound Logistics

- **Cloud Service Integration:** Managing the integration of solutions with the customer's existing cloud providers or selected cloud platforms (e.g., Azure).
- **Data Delivery and Access Management:** Ensuring secure, compliant, and efficient access to customer data through the platform, including encrypted data transmission and secure access protocols.
- **Customer Onboarding:** Smoothly onboarding new customers, ensuring they understand how to use Induz's services and integrate them into their existing infrastructure.

Marketing and Sales

- **Market Segmentation:** Identifying and targeting enterprise customers, SMEs, and consumers with tailored messaging and value propositions.
- **Brand Positioning:** Establishing as a leader in Zero Trust architecture, particularly focusing on its expertise in confidential storage, IAM, and Tokenization.
- **Sales Strategy:** Implementing direct sales efforts for enterprise customers and channel partnerships or digital marketing for SMEs and consumers.
- **Customer Education:** Providing resources, case studies, and white papers that highlight the importance of Zero Trust and the value of Induz's solutions.

Customer Service

- **Technical Support:** Offering 24/7 technical support to assist customers with any issues related to the platform.
- **Customer Success Management:** Proactively working with customers to ensure they are fully leveraging Induz's solutions to meet their security and compliance goals.
- **Feedback and Continuous Improvement:** Collecting feedback from customers to continually refine and improve Induz's offerings.

Technology Development

- **Innovation in Zero Trust Security:** Continuously researching and developing new features and capabilities to enhance the security and performance of Induz's Zero Trust solutions.

- **Platform Enhancements:** Regularly update the platform to incorporate new security technologies, improve user experience, and maintain compliance with evolving industry standards.
- **Scalability and Performance Optimization:** Ensuring that the platform can scale with customer needs and continues to deliver high performance, even as data volumes grow.

Procurement

- **Sourcing Secure Technologies:** Carefully selecting and procuring the best security technologies and cloud services to integrate into the platform.
- **Vendor Management:** Building strong relationships with key vendors to ensure reliable supply chains and access to cutting edge technologies.

Human Resources Management

- **Talent Acquisition and Retention:** Hiring and retaining top talent in cybersecurity, cloud computing, and software development to maintain Induz's competitive edge.
- **Training and Development:** Providing ongoing training to employees to keep them updated on the latest security threats, technologies, and best practices.

Culture Building: Fostering a culture of innovation, security awareness, and customer focus within the organization.

Firm Infrastructure

- **Strategic Planning and Leadership:** Setting the strategic direction for Induz, including long term goals, market positioning, and product development priorities.
- **Financial Management:** Efficiently managing the company's finances, including budgeting, accounting, and securing investment or funding for growth.
- **Legal and Compliance:** Ensuring that complies with all relevant laws and regulations, particularly regarding data privacy, cybersecurity, and intellectual property.

Customer Relationships

- **Account Management:** Building strong relationships with enterprise customers, providing personalized service, and ensuring long term satisfaction and loyalty.
- **Customer Engagement:** Engaging with customers through webinars, workshops, and events to educate them on the latest security trends and how to maximize the value of Induz's services.
- **CRM System:** Using a Customer Relationship Management (CRM) system to track interactions, manage customer data, and identify opportunities for upselling or cross selling additional services.

The following figure depicts the Business Flow chart for the organization:

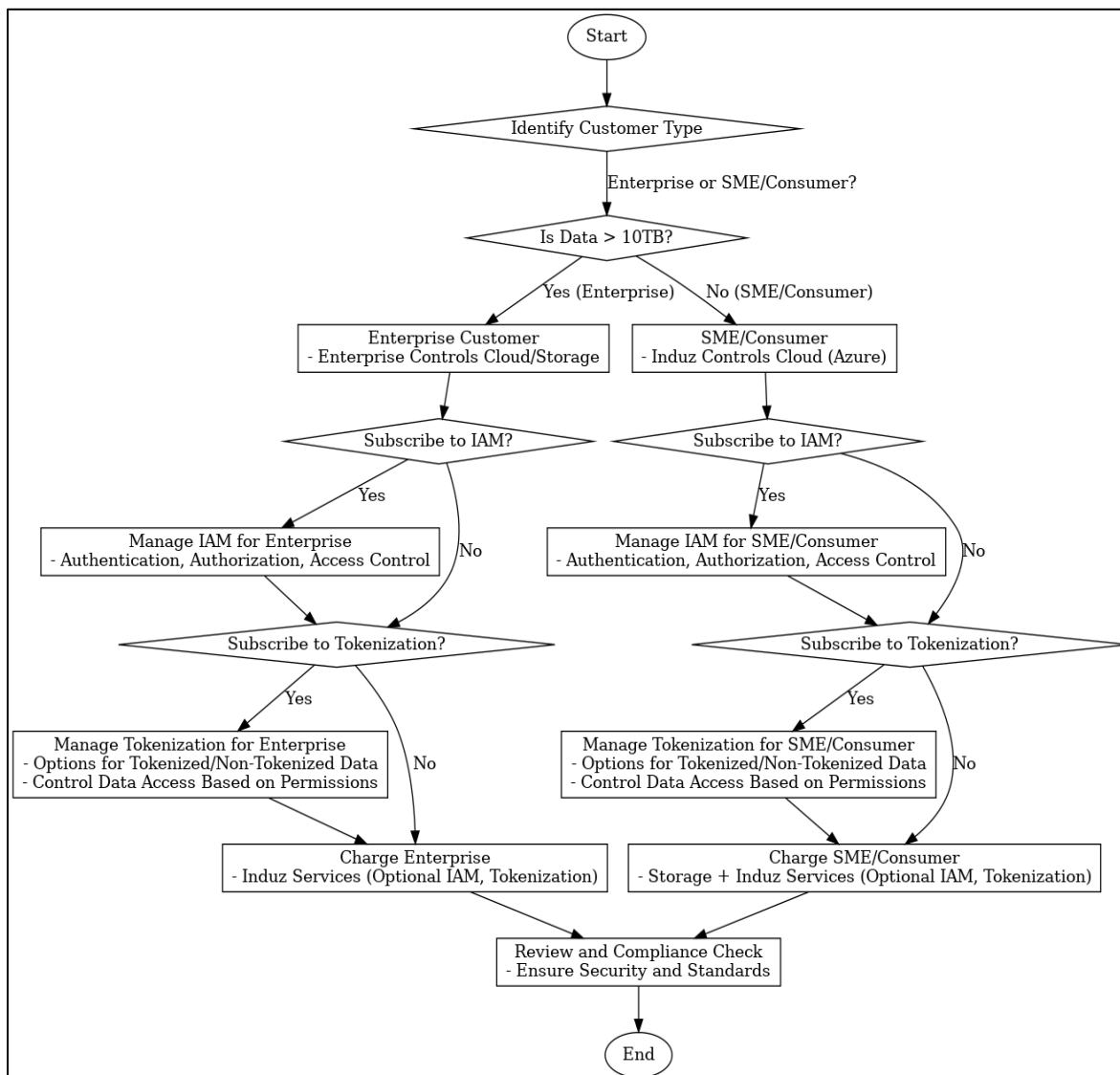
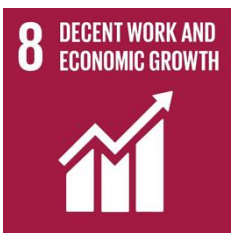




Figure 3 Business flowchart

1.3 ESG and Impact

The following table lists the SDGs that will be potentially impacted by the project and how the organization plans to fulfil it.

Table 5: Business Model and Fulfilment of SDGs

#	SDG	Type of Impact (Direct/ Indirect)	How is the business fulfilling it?
1.		Direct	The customer using the company's product can expect to see economic growth through reduction of resources employed for data protection and data security.
2.		Direct	The product planned for launch by the company is claimed to be a unique technology solution to the problems faced by clients in the areas of confidential storage, computing and delivery.
3.		Direct	The customers using the company's products are expected to see reduced consumption of human resources, equipment and maintenance related to data protection and data security.

Induz Solution offers a comprehensive approach to resource optimization, enabling businesses to save on costs, improve efficiency, and focus on their core objectives. By adopting Induz's Solution, customers can enjoy reduced infrastructure expenses, lower operational overheads, enhanced security, optimized resource utilization, and faster timetomarket, all of which contribute to significant resource savings and a stronger bottom line.

Resources Saved for Customers Using Induz Solution

Induz Solution is designed to optimize resource utilization, providing significant savings across multiple dimensions for our customers. Here's how the solution achieves this:

- Reduced Infrastructure Costs
- Lower Maintenance and Operational Overheads
- Enhanced Security at Lower Costs
- Optimized Resource Utilization
- Time Savings with Faster Deployment and Scaling
- Reduced Compliance and Risk Management Costs

-
- Improved Productivity and Focus on Core Business

2 SITE DETAILS

3 RISK CATEGORIZATION

Based on the review of above background information and Environment and Social Due Diligence, the organization is classified as Category C against various frameworks as explained in Table below.

Table 6: Risk Categorization

Reference standard	Investment Categorization
IFC	Category C: Business activities with minimal or no irreversible adverse environmental or social risks and/or impacts
NIIF	Category C: Projects or business activities with minimal adverse environmental or social risks and/or impacts.
ADB	Environment Category C: Projects or business activities are likely to have minimal or no adverse environmental impacts with the current testing operation. Involuntary Resettlement (IR) and Indigenous People (IP) Category C: Based on the current understanding of the business, the Organization operations is not expected to trigger land acquisition, involuntary resettlement and development in tribal areas.
AIIB and NDB	Category C: Project likely to have minimal or no adverse environmental and social impacts.
YourNest	Category C: Business activities with minimal or no adverse environmental or social risks and/or impacts

4 DESCRIPTION OF ESMP DOCUMENTATION

Figure 4: Documentation Structure

5 E&S POLICY

Purpose of policy: The Company desires to function as a sustainable business with aspirations of being a great employer and corporate citizen. The aim is to grow as a business that is genuinely focused on doing well for all the relevant stakeholders including employees, customers, suppliers, shareholders, and wider society

We, at Induz India Private Limited offers Software As Solution (SaaS) to provide zero trust security for Regulatory Industries like Insurance, Banking, Fintech to safeguard their Sensitive data using Confidential Computing.

- Establish & maintain an Environment, Health, Safety and Social Governance Management Systems and continually improve the same.

- Integrate ESG expectations of all stakeholders into our products and services; policies and procedures; actions, roadmaps, and strategies and ensure adherence to the same.
- Act responsibly towards our investors, lenders, directors, and other stakeholders through good corporate governance mechanisms.
- Recognize social impact of our activities on the local communities in which we operate
- Ensure compliance to all applicable legal requirements within the company and across the supply chain.
- Improve our supply chain to ensure ongoing compliance towards Environmental and Social obligations.

Chief Executive Officer

Signature

Date

E&S policy Scope:

The scope of E&S policy covers the following aspects:

- This policy will be applicable to the company, its workers (on-roll and on contract), its projects, partners, and its affiliates.
- The policy will be applicable, communicated, known, and understood by the employees of the company (on-roll and on contract), its projects, partners, and its affiliates.

6 ENVIRONMENT HEALTH SAFETY AND SOCIAL RISK ASSESSMENT

6.1 E&S Risk Assessment for existing operations

The E&S Risk Assessment is done by 3rd party experienced ESG professionals who have extensive experience in EHS and Social Management System and who have good understanding of IFC Performance Standards. The Risk Assessment considers operations and expansion projects in existing office location, and human resource risks related to employees and contractors and those associated with the value chain including those with suppliers, community, subcontractors and customers. It has covered normal, abnormal and emergency situations. The prevalent risks have been considered based on legal requirements, customer requirements, sector risks, and macro risk rating of the geography at national, state and city level. While the criteria for Risk Assessment are given below, the current list of risks is given in Annexure 3.

The risks considered for Induz's office operations are the following:

- EHS and Social Risks for office work
- EHS and Social Risks of its contractors i.e. Supply Chain
- Information Security Risks
- HR related risks like those due to Disciplinary Action, Termination, Retrenchment, etc are addressed in Policy and Procedure Manual.

The risk assessment is a product of the probability (likelihood) of occurrence of the risk and the consequence (Impact) of the same on the organization with respect to the E&S requirements. This is done on a 3x3 matrix and the criteria for the same is listed below.

Table 7 Risk Assessment Criteria

Probability / Likelihood

Level	Score	Description of Criteria for Probability (Likelihood)
Unlikely	1	Highly unlikely to occur based on current information, as the circumstances likely to trigger the risk are also unlikely to occur.
Possible	2	Likely to occur.
Definite	3	Highly likely to occur as the circumstances that will cause this risk to occur are also very likely to occur

Impact / Consequence

Level	Score	Description of Criteria for Consequence (Impact)
Insignificant	1	Within the department (or) within the organization with no significant impact on the E&S parameters
Measurable	2	Across the organization with measurable impact on the E&S parameters
Major	3	Effect on legal requirements, regulator & interested party requirements and penalties related to E&S parameters

The risk treatment requirements are depicted graphically in the table below:

IMPACT	3	Transfer	Treat	Treat
	2	Tolerate	Tolerate	Treat
	1	Tolerate	Tolerate	Treat
		1	2	3
		PROBABILITY		

7 COMPLIANCE OBLIGATIONS

Induz will use a multipronged approach to cover compliance obligations related to multiple spheres and coming from different interested parties, like regulators, customers, lenders and community. It would maintain a list of compliance obligations that would be updated either on a quarterly basis or on receipt of any new contractual requirements related to Environment, Health, Safety, and Social issues or expansion into any new territory or any concerns from regulatory agencies or any other relevant interested parties.

The overall compliance level will be reviewed at a six monthly frequency. This will be reported in the management review and progress on gaps, if any, will be reported to YourNest during monthly reporting.

The consolidated list of compliance obligations is given in Annexure 4.

8 ESMP OBJECTIVES TARGETS AND MANAGEMENT PROGRAMS

Based on the significant risks identified through the risk assessment exercise, Objectives and Targets and Management Programs have been established to minimize the probability and impact of the risks to the organization. These are described in the List of Objectives and Targets in Annexure 5.

9 RESOURCES

Induz has a process of identifying resources including infrastructure, financial, technical, people and skills essential for the implementation of this ESMP.

The resource requirements and their adequacy are reviewed during management review on a six monthly frequency.

This would include decisions related to the need to augment inhouse resources or outsource any process to an external agency in order to meet the existing E&S requirements or that arise additionally through changes in process, regulations or other stakeholder requirements.

10 ORGANIZATIONAL CAPACITY AND CAPABILITY

10.1 Organizational Structure

Following is the organization chart indicating the reporting structure and Roles & Responsibilities. The E&S responsibility is handled by the CTO, as highlighted in the organization chart.

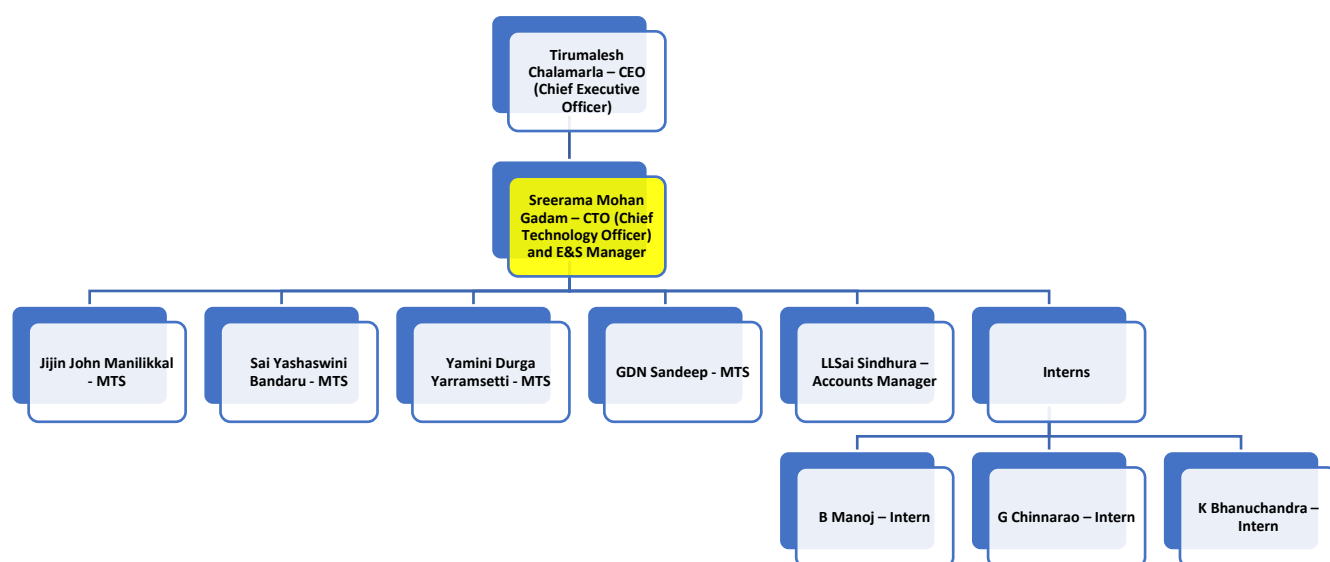


Figure 5 Current Organization chart of Induz:

The following are the roles and responsibilities of the E&S manager:

- Developing and implementing E&S strategies, policies, and frameworks that align with the organization's values and goals.
- Conducting thorough E&S assessments and identifying key sustainability risks, opportunities, and performance indicators.
- Collaborating with cross-functional teams to integrate E&S practices across various business functions, including operations, supply chain, human resources, and finance.
- Monitoring and reporting on E&S performance, ensuring compliance with relevant regulations, industry standards, and reporting frameworks.
- Engaging with stakeholders, such as investors, employees, customers, and

communities, to communicate the organization's E&S efforts and foster meaningful relationships.

- Staying updated on emerging E&S trends, best practices, and regulatory developments to drive continuous improvement and innovation.

Table 8: Overall Team Strength at Office:

Category	Male	Female	Total
Management	3	1	4
Design & Project Engineers	9	4	13
Total	12	5	17

The following are qualifications and experience of the professionals in the organization.

ESG Roles and Responsibilities

S.N.	Identified Person	Key Responsibility
1	Board of Directors	<ul style="list-style-type: none"> • Adoption of Policy and ESMP commitments, revision, and sign off on updates. • Responsible for taking decision on the level of E&S risk exposure is acceptable before proceeding with a transaction. • Determine course of action in case of non-compliance of investee on the ESG action plan
2	Chief Executive Officer	<ul style="list-style-type: none"> • The CEO shall review this policy annually and make sure it is up to date with respect to applicable laws and regulations. • The CEO shall ensure that the policy and related initiatives are implemented across the organization. • The CEO shall further ensure that the designated E&S manager and team, as well as other senior leadership members/ KMPs having interplay with the E&S matters, have appropriate KRAs integrated into their job roles. • The CEO along with the head of HR, will ensure that the designated E&S team is provided with basic and job specific E&S training and development opportunities for being able to deliver on the company's E&S commitments.
2	E&S manager (CTO has taken this as additional responsibility)	<ul style="list-style-type: none"> • The E&S Manager will report to the CEO • The E&S manager is mainly responsible to communicate this policy to relevant parties and also to have an oversight on implementation of E&S aspects across the business cycle. • The E&S manager with the approval from CEO shall oversee the change management of the E&S policy and management system. • The E&S Manager maintains and reviews the legal register & its tracking. • The E&S manager will provide the strategic E&S vision to the company and drive implementation of this ESMP. He/ She will ensure that the outcomes of investor due diligences, periodic assessments and their proposed corrective action plans are implemented. • The E&S manager will formulate budget requirements every year which is crucial for implementation of E&S action plans, objective targets, training, and capacity buildings and monitoring as well as revealing commitments.

S.N.	Identified Person	Key Responsibility
		<ul style="list-style-type: none"> The ESG manager will review the performance of the company in line with the agreed action plan and regarding any environmental or social development opportunities. Monitoring & Reporting: The ESG manager will maintain the database of the company's E&S performance and provide periodic updates to its shareholders. The E&S manager shall ensure that processes are put in place to mitigate occupational Health and safety risks and to respond to any health and safety related emergency. The E&S manager shall ensure that a Pollution prevention and control plan is put in place to minimize emission due to operation of the portfolio companies. The E&S manager shall ensure that grievances coming from all key stakeholders is recorded and responded to in a timely manner.
3	E&S support team	<ul style="list-style-type: none"> The team will be mainly responsible for ensuring implementation and compliance in terms of E&S requirements across the business cycle. They will also act as key point of contact for shareholders. They are responsible for facilitation and communication of E&S aspects, as guided by the E&S manager. The E&S support team will implement the performance of the company in line with the agreed action plan and regarding any environmental or social development opportunities and report the same to the E&S manager. The team with approval from E&S manager will be responsible for the preparation of business related EHS aspects identification, SOPs, Work instructions etc.
4.	Administrative Department	<ul style="list-style-type: none"> The administrative department shall ensure implementation of the Pollution prevention and control plan. The administrative department shall carry out the implementation of process to prevent occupational health and safety hazard. The administrative department shall carry out training sessions with the employees to ensure understanding and adoption of the policy

10.2 HR Processes including Training & Development

The HR will coordinate with E&S Manager for the identification of E&S related training needs. The E&S Manager will assess and track the training needs using the risk and aspect study to identify the level of instruction required by personnel whose job responsibilities may create a significant E&S risk or impact.

Training needs Assessment (TNA) will be identified based on, but not necessarily limited to, the following criteria:

- Assigned work activities and associated operational control procedures to reduce potential E&S risks /impacts.
- Regulatory required training

- Abnormal or emergency situations related to E&S that require different responses and actions.
- Findings from past experiences and suggestions from the E&S Manager.

The training needs will be adequately identified tracked and reviewed on annual basis to ensure that relevant executives have been covered and an annual training plan will be prepared. E&S Manager and HR will identify the areas for training and personnel to be trained.

The E&S training details of relevant employees shall be maintained in training record. The effectiveness of the training shall be discussed during management review meeting.

For Competence

Employee competency related to E&S will be determined through a combination of performance observations, work experience, educational background and/or other appropriate means.

The E&S competency matrix shall be developed for each employee, defining the competency requirements and the plan for upgradation as shown in the Table below. The associated records of competency compliance are retained and maintained by the HR.

Table 9 Competence related to E&S

Competence levels:

- 1 – Fresh and does not have basic awareness
- 2 – Has basic awareness and can perform with guidance
- 3 – Can perform independently
- 4 – Expert, can guide others

S.no	E&S parameter	Desired competence level	Existing competence level	Targeted competence level & year	Remarks
1	awareness of E&S requirements				
2	Office safety & basic ergonomics				
3	Occupational health management				
4	Fundamentals of Risk Management (for Safety, Environmental and				

S.no	E&S parameter	Desired competence level	Existing competence level	Targeted competence level & year	Remarks
	Social risks and impacts)				
5	Emergency preparedness				
6	Understanding of Air, water & ground pollution				
7	Waste management				
8	Fundamentals of Energy Efficiency				
9	Incident Investigation and Root Cause Analysis				
10	Awareness and use of PPE				
11	Perform E&S audits inhouse & at supplier				

Training plan

Based on the results of the training needs assessment and the competency assessment, the organization prepares an annual training plan. The HR department will be the central point for coordination and completion of the training as per the plan. The format for the training plan is provided in the table below.

Table 10 Training plan for the year

S.no	Training topic	Derived from TNA / Competence / Other requirements	Training faculty	Planned participants	Targeted month of training in the FY	Actual month of completion of training
1						
2						
3						
4						
5						
6						
7						

The effectiveness of the training shall be measured through any of the following methods:

- Training completion certificate issued by the organization or the external training agency for external trainings.
- Pre and Post-tests conducted by the trainer as part of the internal training.
- Observation of the E&S Manager and / or the direct supervisor on work related to E&S compliance actions.

The ESG training details of relevant employees shall be maintained in training record. The effectiveness of the training shall be discussed during management review meeting.

11 CONSULTATION AND COMMUNICATION

11.1 Stakeholder Engagement Plan

Induz has developed a Stakeholder Engagement Plan (SEP) as shown in Table below:

Table 11 Stakeholder interactions

Stakeholder	Objective of Engagement	Method of Consultation & Engagement	Frequency of Consultation & Engagement	Responsible Person for Engagement
Employees	Engagement Productivity Innovation Retention	Direct interaction with supervisor, HR or skip level manager	Continuous and periodic performance reviews	Immediate supervisor & HR & Finance manager
Customers	Understand and fulfil needs & expectations	Customer feedback, interactions for product requirements	Annual customer survey, and new requirements on project basis	CEO / Marketing
Suppliers and Business Partners	Understand and fulfil needs & expectations	Supplier feedback, interactions for product requirements	Half yearly supplier review, and new requirements on project basis	HR & Finance manager
Investors/ LLPs	Understand and fulfil needs & expectations and mitigate governance risk	Review of performance on agreed KPIs	Six monthly	CEO
Regulatory Agencies	Understand changes in regulatory requirements and take action to fill the gap	Discussions in person, phone or emails	Review on a quarterly basis	E&S Manager
Consultants, Auditors and Advisors	Advise on technical and regulatory matters	On call Periodic updates on regulatory affairs Audits	Ongoing and six monthly audits	CEO / CTO

Stakeholder	Objective of Engagement	Method of Consultation & Engagement	Frequency of Consultation & Engagement	Responsible Person for Engagement
Media & NGOs	Explain the company objectives and statement of current status	In person or email	As necessary	CEO

Induz has developed a mechanism for tracking of Stakeholder Engagement as shown in *Annexure 9*.

11.2 Grievance Redressal Mechanism

Induz has established a GRM that is detailed below. The same shall be posted on the website of the organization.

Induz is committed to fostering an open, transparent, and supportive environment where employees, suppliers, contractors, and other stakeholders can raise their concerns. This grievance policy ensures that all complaints, whether internal or external, are addressed promptly and fairly.

Grievance Types Covered:

- Internal Grievances: Complaints raised by employees regarding workplace conditions, harassment, discrimination, unfair treatment, or any violations of company policies.
- External Grievances: Complaints raised by third parties, such as contractors, vendors, suppliers, or clients, related to ethical violations, service issues, contract disputes, or any other concerns affecting external relations with
- Anonymous Submissions: Induz allows anonymous submissions to ensure that all individuals feel safe in reporting their concerns without fear of retaliation. Grievant can omit personal details when emailing or submitting complaints via phone.

Grievance process:

- 1) Internal & External stakeholders can report grievance through email to sreeram@induz.io. This email id can be used for anonymous submissions also. The following information should be provided along with the complaint:

Name and Contact Information (optional)

- Name of the company to which the concern relates.
 - Description of the concern and any supporting documentation
 - Date of the incident or action giving rise to the complaint (if applicable)
 - Specific remedy sought (if applicable)
 - Any other information as deemed appropriate by the complainant.
- 2) Upon receipt of a grievance, Induz will acknowledge the complaint within 2 working days via email or phone, depending on the mode of submission.
 - 3) An initial assessment of the grievance will be conducted to determine the severity and the appropriate course of action. The grievance may be escalated to HR for further investigation.
 - 4) All grievances will be handled with the utmost confidentiality to protect the privacy of the complainant. Only those directly involved in the investigation and resolution process will have access to the details of the complainant.
 - 5) A detailed investigation will be carried out, involving interviews, document reviews, and any other necessary actions. The investigation process will typically be completed within 10 working days from the date of acknowledgment. If more time is needed due to the complexity of the grievance, the complainant will be notified, and regular updates will be provided.
 - 6) After the investigation is completed, Induz will take appropriate corrective action based on the findings. This may include disciplinary action, changes in policies or practices, or other remedies as necessary. The complainant will be informed of the outcome. In case of anonymous submissions received by email, the information will be provided to the same email address.
 - 7) In case the complainant is not happy with the resolution provided, he / she may escalate the grievance as given in the escalation matrix below. The acknowledgment and timelines for the escalated grievance will be the same as listed above. The complainant will be informed of the outcome in writing by the senior authority.
 - 8) In case the complainant is still not satisfied, he / she can proceed for appeal.

Escalation Matrix

S.No	CONTACT PERSON	EMAIL ID	TELEPHONE NO.
1	Sreerama Mohan G	sreeram@induz.io	9440499909

2	Tirumalesh Ch	tirumalesh@induz.io	9059443907

Appeal process:

- 1) Grounds of Appeal: If the complainant is dissatisfied with the decision, they may appeal on the following grounds:
 - a) Unfair process
 - b) Inadequate resolution
 - c) New evidence
 - d) Procedural flaws
- 2) The complainant must file an appeal within a specific period (usually 7 to 10 days) from receiving the initial decision.
- 3) The appeal is submitted in writing, clearly stating the reasons for the appeal and including any supporting documentation.
- 4) The appeal committee consisting of the CEO, CTO and HR deliberates on the evidence and arguments presented.
- 5) Final Ruling: The committee issues a final decision, which could affirm, modify, or overturn the initial decision. This decision is communicated in writing to the complainant, detailing the rationale behind it.
- 6) Consideration of Legal Action: If the internal appeal does not resolve the issue to the complainant's satisfaction, they may consider taking the matter to court.
- 7) The complainant may file a lawsuit in an appropriate court depending on the nature of the grievance.
- 8) If the court rules in favour of the complainant, the company must comply with the judgment, which could include compensatory damages, policy changes, or reinstatement of the employee.
- 9) Appeal to Higher Courts: If either party is dissatisfied with the court's decision, they may appeal to a higher court, following the legal processes in place.

11.3 Communication matrix

Induz has prepared a communication matrix for the key communication on E&S activities in the company as shown in Table below.

Table 12: Communication Matrix

#	What to be Communicated	Who will Communicate ?	Whom to be Communicated ?	How to be Communicated ?	Frequency of Communication
1	E&S Policy	E&S Manager	Employees, Customers, Suppliers and other relevant stakeholders	Display across the company, email and written correspondence Display over company website	Annually and during change in policy
2	Leadership (Number of CEO /HOD /Leadership Team Rounds)	CEO	Investors	In meetings or email	Quarterly
3	Leadership (Number of EHS Observations Raised in above Rounds)	E&S Manager	Senior management, investors, employees	In meetings or email	Six Monthly
4	Social (Number of Male + Female Employees)	HR Manager	E&S Manager, Senior Management	Email	Six Monthly
5	Social (Number of Complaints received and managed under Grievance Redressal Management)	E&S Manager	Senior management, investors, employees	In meetings or email	Six Monthly
6	Social (Number of Retrenchments)	HR Manager	E&S Manager, Senior Management	Email	Six Monthly
7	General ESG Update • Status updates of corrective actions required by the ESAP • Any incident / minor	E&S Manager	YourNest	Email / Report	ESAP updates-monthly/quarterly, Major reportable Incident - immediate , Trainings - six monthly

#	What to be Communicated	Who will Communicate ?	Whom to be Communicated ?	How to be Communicated ?	Frequency of Communication
	accident occurred • Training & workshop conducted • Any grievance received/addressed				GRM tracker-Quarterly
8	Health & Safety (Loss of Life)	E&S Manager	YourNest	Immediately on email within 2 hours + Accident reporting format within 24 hours + Accident investigation report within 7 days	Within 24 hours
9	Health & Safety (Serious Injury/ Loss Time injury/ Major Accident)	E&S Manager	YourNest	Immediately on email within 2 hours + Accident reporting format within 24 hours + Accident investigation report within 7 days	Within 48 hours
10	First Aid Cases	E&S Manager	Senior management	Report / Review meeting update	Monthly MIS
11	Near Misses	E&S Manager	Senior management	Report / Review meeting update	Monthly MIS
12	Dangerous Occurrences	E&S Manager	Senior management	Report / Review meeting update	Monthly MIS
13	Social/ Environmental (Material adverse impacts on communities and/or the environment, including incidents)	E&S Manager	YourNest	Email	Within 48 hours



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#	What to be Communicated	Who will Communicate ?	Whom to be Communicated ?	How to be Communicated ?	Frequency of Communication
	having compensation claims)				
14	Extreme Events (Events linked to natural hazards)	E&S Manager	YourNest	Email	Within 48 hours
15	Compliance Obligations (Number of Regulatory Inspections)	E&S Manager	YourNest	Email	Six Monthly
16	Compliance (Material Breach of Law including Regulatory Notices/ Show Cause Notices)	E&S Manager	YourNest	Email	Within 48 hours
17	Compliance (Material breach of Side letter requirements)	E&S Manager	YourNest	Email	Within 48 hours
18	Annual reporting on E&S to YourNest as per Annexure H of the YourNest ESMS Ver 2.2	EtherealX	YourNest	Email	Annually
19	I				

12 OPERATIONAL CONTROL INCLUDING SUPPLY CHAIN MANAGEMENT AND CONTRACTOR MANAGEMENT

12.1 Waste Management

Induz has adopted the following steps for management of various wastes.

For E waste:

- Educate Employees
- E waste should not be mixed with solid waste.
- E waste should be segregated and collected separately.
- Handover E waste generated to authorized recycler/ refurbisher.

For Biomedical Waste:

- Educate Employees
- Biomedical waste should be segregated and stored in specific containers marked for the type
- Ensure use of appropriate Personal Protective Equipment
- Hand over to common biomedical waste treatment facility for treatment, processing and final disposal.
- Do not store beyond a period of 48 hours.

For Solid waste:

- Educate Employees
- Segregate waste into wet, dry and sanitary waste.
- Provide appropriate bins for each segregated category of waste.
- Ensure waste is collected from the office by the concerned authority.

For UPS Battery waste

- Educate Employees
- Old UPS batteries should be disposed in an environmentally friendly manner through the proper recyclers.
- For this purpose, all battery replacements will be on a "Buy-Back" basis with the supplier and the same shall be indicated in the purchase order issued to the supplier for new batteries.

12.2 Office Safety

Induz follows the following office Safety Rules

- Smoking is strictly prohibited.

- Please follow the sign board while opening the doors (Push / Pull signs)
- Do not plug any high voltage equipment in nonpower switches.
- Do not use multiplug connections more than three in a multi socket boards.
- Do not use cut cable cords, naked cables & do not plug multiple cords into a single outlet.
- No cable to be run on the floor or below rugs.
- Keep a minimum distance of 10 cms away from the wall for heavy wattage equipment.
- Tilting of chairs while sitting is not advised as it can be dangerous.
- Do not stand on furniture to reach high places. Only ladder usage is permitted to retrieve overhead items.
- Using handrails is compulsory while ascending & descending staircases.
- Ensure proper position / postures while working. Follow good Ergonomics Position/posture practices at your respective workplace.
- Avoid table fans/floor fans in walkways, aisles, or doorways.
- Use stapler safely.
- Turn the power switch off & unplug any machine.
- Keep 18" 20" distance to have safe viewing of monitors below eye level.
- Ensure adequate illumination during all activities.
- Do not spill water on the floor to avoid slipping and falling.
- Do not store combustible material like rags, cotton, etc.

12.3 Supply Chain Control

The Supply chain risk assessment necessarily includes risk assessment of child labour, forced labour and compliance to minimum wages. If any child labour and forced labour is found, appropriate remedial steps are taken for the same. In case, it is not possible to influence or remedy the child or forced labour, the primary supply chain will be shifted to suppliers and contractors who can demonstrate prohibition of child labour and forced labour.

The organization shares EHS covenants as applicable to the supplier and will monitor for implementation by them.

Induz has developed a code of conduct for suppliers that will be signed by all suppliers. Induz has also developed a E&S checklist for the evaluation of suppliers towards the E&S requirements. These are available in *Annexure 10 & 11*

E&S Risk assessment and management in the supply chain:

Table below lists the type of suppliers, extent of control over them and the actions to be taken to ensure the right E&S management control.

Table 13 E&S Risk Assessments in Supply chain

S. No	Type	Level of interaction & involvement	Level of control for E&S	Actions to ensure E&S Management control
1	Outright purchase	Procurement of market standard parts from retailer or distributor	Low as these are market standard products from standard retailers (or) sourced through ecommerce	Where possible, take a declaration from the supplier on prohibition of child labour and forced labour. Insert a clause into the contract for purchase with the supplier for complying with all statutory and regulatory E&S requirements.
2	Outsourced manufacturing	Parts manufactured for the company against specific design specifications issued, with the supplier handling all related procurements.	The control is limited to the outsourced manufacturer and the company has no control on where and how he sources the material and production.	Take a declaration from the outsourced manufacturer on prohibition of child labour and forced labour and that all statutory & regulatory requirements for manufacturing including compliance to labour laws such as minimum wages, overtime, grievance management, freedom of association, etc have been complied with. Include the same into the contract made for the outsourcing activity with the contractor.
3	Job work agreement	Parts manufactured for the company against the	The control on the procurement of parts will be same as listed for	Take a declaration from the outsourced manufacturer on prohibition of child labour and forced labour and that all

S. No	Type	Level of interaction & involvement	Level of control for E&S	Actions to ensure E&S Management control
		specifications issued, with the company handling the procurements for raw material.	<p>"Outright purchase".</p> <p>The company has a higher level of control on the manufacturer.</p>	statutory & regulatory requirements for manufacturing have been complied with. Include the same into the contract made for the outsourcing activity with the contractor. In specific cases, visit the supplier site for an audit to ascertain the same.
4	Auditors & Legal advisors	Procured services	High	Obtain a declaration that all statutory & regulatory requirements are met. Include the same into the contract made with them for the engagement.

13 EMERGENCY PREPAREDNESS AND RESPONSE

Induz has a high-level focus on prevention of emergencies so as not to put constraints on the resources of the organization or emergency service providers. Induz ensures that the Emergency Response Plan developed and implemented is shared with all the employees and they are aware of the same and act accordingly. The following steps are taken for prevention of emergency.

S No	Type of Emergency	Probability	Impact	Preventive Actions	Response Mechanism
1	Fire	Low	High	Ensure there are no loose electrical connections to create short circuits.	The E&S manager shall Maintain the details of emergency service providers including fire services in the nearby area and display the same prominently in the office space. Provide training to all personnel on fire emergencies, conduct mock drill periodically and sensitize employees to the risks and hazards.
2	Disruption of Internet	High	High	Monitor Uptime to ensure Reliability of Internet Service Provider (ISP)	Establish 100% redundancy in case of disruption of internet line Conduct regular mock drills for disruption of internet
3	Theft or Loss of Data	High	High	Develop specific policy on Information Security Train the personnel on	Recover from backup. Conduct mock drills periodically for data loss.

S No	Type of Emergency	Probability	Impact	Preventive Actions	Response Mechanism
				<p>Information Security</p> <p>Integrate Information Security into HR policies</p> <p>Backup facility for vital data</p>	
4	Medical Emergency	Low	Medium	<p>Design the office to ensure good indoor air quality</p> <p>Provide safe drinking water to all personnel in office</p> <p>Ensure Ergonomic designs for seating and work.</p> <p>Provide training to office personnel on above topics also including first aid training, cardiac arrests.</p> <p>Display of contact number of nearby hospitals/clinics</p>	<p>The E&S Manager shall Maintain the details of emergency service providers including medical emergency services in the nearby area and display the same prominently in the office space. A first aid box must always be present and checked periodically.</p> <p>Conduct periodic mock drills for medical emergency</p>
5	Supply Chain Disruption	Low	Medium	<p>Ensure awareness of the suppliers and/or contractors on</p>	<p>InduZ shall Review and impress upon the importance of implementing policies &</p>

S No	Type of Emergency	Probability	Impact	Preventive Actions	Response Mechanism
				<p>their key Environment, Health, Safety and Social Risks including but not limited to Prohibition of Child Labor and Forced Labour</p> <p>Drive implementation of policies and procedures related to Emergency Preparedness, Prohibition of Child Labor and Forced Labour and Regulatory Compliance</p>	<p>procedures related to Environmental, health, safety & social risk with key suppliers at an annual frequency</p> <p>Where feasible, develop alternate suppliers to work with to ensure business continuity in case of disruption with existing supplier.</p>
6	Road Accident while commuting for business, such as visit Suppliers or customers, etc.	Medium	Medium	Train the personnel on Road Safety and safe driving	Maintain emergency contacts list for road accidents with access to all employees.
7	Earthquake	Low	Low	<p>Ensure structural stability of building in which office space is taken</p> <p>Train the team on earthquake emergency situation</p>	<p>Maintain numbers of State Disaster Relief Teams and National Disaster Management Authority</p> <p>Conduct desktop assessment of the earthquake response plan</p>

S No	Type of Emergency	Probability	Impact	Preventive Actions	Response Mechanism
8	Pandemic	Medium	High	<p>Ensure personal hygiene and prevention steps as per Government guidance.</p> <p>Provision of Good Air Quality</p> <p>Provision of Housekeeping support to ensure hygiene of high standards</p> <p>Periodic training to the team on pandemic</p>	<p>Conduct desktop assessment of the pandemic response plan</p>
9	Compliance Failure	Medium	High	<p>Follow the procedure related to compliance obligations</p> <p>Provide relevant training to relevant personnel on compliance obligations</p>	<p>Establish a clear response plan to manage any cases of noncompliance.</p> <p>Conduct periodic assessment of the noncompliance response plan.</p>

14 MONITORING AND MEASUREMENT

Progress on the implementation and effectiveness is monitored through Objectives and their Action Plans, Compliance Obligations, and key measurements like generation of e-waste, any grievances and/or security incidents, etc related to EHS and social risks are captured in the Monitoring and Measurement matrix.

Table 14: Measurement and Monitoring

S No	Monitoring Indicator	Responsibility	Frequency	Record Ref	Review
1	Vendor Evaluation for EHS and Social Aspects	E&S Manager	Annually		
2	e-Waste generation	E&S Manager	Quarterly		
3	Audit Findings	E&S Manager	Annually		
4	Grievances including Customer complaints and any other stakeholder grievance	HR Manager	Quarterly		
5	Adherence to Code of Ethics	HR Manager	Annually		
6	Disciplinary Actions if any	HR Manager	Quarterly		
7	Any other HR complaints like POSH, etc	HR Manager	Quarterly		
8	Security Incidents	IT	Quarterly		
9	Number of Safety Incidents (First Aid/ LTI/ Near Miss/ Near Miss SIF/ Fatality and Dangerous Occurrences)	E&S Manager	Monthly		

15 INTERNAL AUDITS

Internal audits to assess the continued implementation and effectiveness of ESMP are done by a team of qualified internal auditors at a frequency of six months. These are done either by an external agency with experience in ESMS audits or by team of internal auditors trained on both ESMS and Auditing Techniques. Results of the audits along with status of corrective actions are presented in the subsequent management reviews.

For each six monthly audit, list of auditors who conducted the audit along with their qualification, audit checklist or report indicating adequate coverage of elements of ESMP are kept as evidence.

MANAGEMENT REVIEW

Management reviews are conducted at least once in six months to review overall effectiveness of ESMP. The top management along with members of various functions carry out this review. All important environmental, health & safety and social issues are duly discussed with the top management in Management Review Meeting

The team members involved in the management review, input agenda and outputs of the review are given in Annexure 8

The outputs of the management review in the form of Minutes of Meeting are submitted along with Annual Report in format as per Annexure H of YourNest ESMS.....

16 E&S INCIDENTS AND CORRECTIVE ACTIONS

E&S Incidents mean incidents of any social, labour, health and safety, security or environmental nature, accident or circumstance (including, without limitation, any explosion, spill or workplace accident which results in death, serious or multiple injuries or material environmental contamination, any violent labour unrest or dispute with local communities) occurring on or nearby the Induz office site. These E&S incidents could reasonably be expected to have, any material adverse social and/or environmental impact on the company operations.

Induz will notify the fund immediately within 24 hours about any serious incident involving the company that result in loss of life, serious injury, and material effect within a defined period of occurrence in case of any serious incident/accident within the premises, including those that result in serious injury, material adverse impacts on communities and/or the environment, or a material breach of law.

Subsequently, and within a defined time period as per yourNest ESMS, acknowledging that the exact timing might vary due to the nature of each incident and associated legal and commercial sensitivities, Induz will submit an investigation report to the Fund and will agree on corrective actions.

Corrective actions are initiated based on the results of monitoring and measurement, evaluation of compliance to legal and other requirements, internal audits, grievance, site E&S or information security incident, customer complaints or any other concern of interested parties or stakeholders. These inputs are taken through the process of response, correction, investigation, corrective action, and management review. Details of timelines and teams involved in this process are described in the format shown in *Annexure 6*

Annexure 1: Applicability Analysis of relevant ESG Frameworks

Table 15: Applicability Analysis of IFC

IFC PS	Applicability
PS 1 Assessment and Management of Environmental and Social Risks and Impacts	Applicable There are some environmental and social risks and impacts during the software and hardware product development and applications, hence applicable. The organization needs to establish ESMP and identify the risks as described in respective sections of the report.
PS 2 Labor and working conditions	Applicable The company has its own employees and also suppliers. Hence, the requirements related to its employees and supply chain will be applicable
PS 3 Resource Efficiency and Pollution Prevention	Applicable The company has impacts related to resource consumption to a limited manner given the nature, scale & size of the office operations. Hence, this will be applicable
PS 4 Community Health, Safety and Security	Not Applicable Given the nature, scale and size of the office work performed, the activities of the organizations do not have any significant impact on the community. The organization does not access the information / data of the client at any point in time and hence the data security requirements do not apply.
PS 5 – Land Acquisition and Involuntary Resettlement	Not Applicable The company is currently working in a rented building in a residential area and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to have any risks of land acquisition and Involuntary Resettlement.
PS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resource	Not Applicable The company is currently working in a rented building in a residential area and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to have any significant impact of Biodiversity Conservation and Sustainable Management of Living Natural Resources.
PS 7 – Indigenous People	Not Applicable The company is currently working in a rented building in a residential area and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to lead to any impact on Indigenous people.
PS 8 – Cultural heritage	Not Applicable The company is currently working in a rented building in a residential area and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to lead to any impact on Cultural Heritage.

SOURCE: VALIDATED BASED ON ESDD ASSESSMENT AND DISCUSSION WITH INDUZ

Table 16: Applicability Analysis of ADB Safeguards Policy 2009

ADB Safeguards Policy	Applicability Status with justification for Exclusion, if any
ADB Safeguards Policy 1 Environment	Applicable
ADB Safeguards Policy 2 Involuntary Resettlement	Not Applicable and Excluded as the organization is currently working in rented offices and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to have any risks of land acquisition and Involuntary Resettlement.
ADB Safeguards Policy 3 Indigenous People	Not Applicable and Excluded as the organization is currently working in rented offices and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to lead to any impact on Indigenous people.

Table 17: Applicability Analysis of AIIB Environment and Social Framework 2016

AIIB E&S Standards	Applicability Status with justification for Exclusion, if any
ESS 1: Environmental and Social Assessment and Management	Applicable
ESS 2: Involuntary Resettlement	Not Applicable and Excluded as the organization is currently working in rented offices and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to have any risks of land acquisition and Involuntary Resettlement.
ESS 3: Indigenous Peoples	Not Applicable and Excluded as the organization is currently working in rented offices and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to lead to any impact on Indigenous people.

Table 18: Applicability Analysis of NIIFL E&S Policy & Principles

NIIFL Principles	Applicability Status with justification for Exclusion, if any
Principle 1: Environmental & Social Risk Assessment and Management Systems	Applicable
Principle 2: Environmental Risks and Management	Applicable
Principle 3: Human Resources Management	Applicable
Principle 4: Social Risks and Management	Not Applicable and Excluded as the organization is currently working in rented offices and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to cause

NIIFL Principles	Applicability Status with justification for Exclusion, if any
	any involuntary land acquisition or cultural heritage and during land acquisition.

Table 19: ESMP YourNest Innovative Products VC Fund III Version: 2.2 dated 25 May 2023

YourNest Reference	Applicability Status with justification for Exclusion, if any
Section II. ESG Philosophy	Applicable Broad set of investment approaches and considerations that can be grouped under the term 'Sustainable Investing'
Section IX. E&S accidents, incidents, breaches, and anomalies	Applicable
Section VI. Applicable ESG Standards and Annexure N ESMP Format for Portfolio Company	Applicable
Section VII. ESG integration across the investment lifecycle and Annexure O	Not Applicable and Excluded as the organization is currently working in rented offices and is not likely to move out for expansion to any other location with the current round of funding. Hence, it is not likely to cause any involuntary land acquisition or cultural heritage and during land acquisition.

Annexure 2: E&S Risk Assessment

Every investment considered by YourNest and NIIF is required to be categorized based on the rationale presented in NIIF's E&S Management Policy. The rationale is presented below:

- **Category A:** Projects or business activities with significant adverse environmental or social risks and/or impacts that are direct or indirect, diverse, across different locations, persistent over a period, irreversible, cumulative, or unprecedented will be classified under this category.
- **Category B:** Projects or business activities with limited adverse environmental or social risks and/or impacts that are direct or indirect, markedly site-specific, manageable over a period, largely reversible, and readily addressed through mitigation measures.
- **Category C:** Projects or business activities with minimal adverse environmental or social risks and/or impacts.
- **Category FI:** NIIFL investments in sub funds that will be managed by financial intermediaries will be classified, in three tiers, under this category.

There is no significant Environmental or Social impact through the development of product as detailed in Section 2.1 and 2.2. Based on the ESDD assessment findings and information provided by the Organization when compared against the various reference framework standards, the normal operations of the Project have been assessed to fall within the categories listed below.

- As per Annexure D of ESMS YourNest Innovative Products VC Fund III Ver 2.2 dated 25May23 the project falls under **Category C: Business activities with minimal or no irreversible adverse environmental or social risks and/or impacts.**

The categorization of the Organization on environment, involuntary resettlement and indigenous peoples is presented below:

Table 20: **E&S CATEGORIZATION**

Reference standard	Investment Categorization
IFC	Category C: Business activities with minimal or no irreversible adverse environmental or social risks and/or impacts
NIIF	Category C: Projects or business activities with minimal adverse environmental or social risks and/or impacts.

Reference standard	Investment Categorization
ADB	Environment Category C: Projects or business activities likely to have minimal or no adverse environmental impacts with the current testing operation. Involuntary Resettlement (IR) and Indigenous People (IP) Category C: Based on the current understanding of the business, the Organization operations is not expected to trigger land acquisition, involuntary resettlement and development in tribal areas.
AIIB and NDB	Category C: Project likely to have minimal or no adverse environmental and social impacts.
YourNest	Category C: Business activities with minimal or no adverse environmental or social risks and/or impacts

Annexure 3: EHS and Social Risks

Level	Score	Description of Criteria for Probability (Likelihood)
Unlikely	1	Highly unlikely to occur based on current information, as the circumstances likely to trigger the risk are also unlikely to occur.
Possible	2	Likely to occur.
Definite	3	Highly likely to occur as the circumstances that will cause this risk to occur are also very likely to occur

Level	Score	Description of Criteria for Consequence (Impact)
Insignificant	1	Within the department (or) within the organization with no significant impact on the E&S parameters
Measurable	2	Across the organization with measurable impact on the E&S parameters
Major	3	Affect on legal requirements, regulator & interested party requirements and penalties related to E&S parameters

IMPACT	3	Transfer	Treat	Treat
	2	Tolerate	Tolerate	Treat
	1	Tolerate	Tolerate	Treat
		1	2	3
		PROBABILITY		

S No	Risk	Effect/Impact	Likelihood	Impact	Overall Risk Likelihood * Impact	Risk Mitigation Measures or control measures
1.	Water Consumption	Resource Depletion	1	1	1	
2.	Domestic Wastewater Generation	Environmental pollution	2	1	3	
3.	Industrial Wastewater Generation	Environmental pollution	NA	NA	NA	No industrial wastewater generation directly by the organization
4.	Air Emissions	Environmental pollution	NA	NA	NA	No source of air emission
5.	Solid Waste Generation	Land pollution	2	1	2	
6.	Hazardous Waste Generation	Environmental pollution	1	1	1	
7.	e-waste Generation	Environmental pollution	2	3	6	Ensure E-waste is managed and disposed through

S No	Risk	Effect/Impact	Likelihood	Impact	Overall Risk Likelihood * Impact	Risk Mitigation Measures or control measures
						authorized disposal agencies
8.	Battery Waste Generation	Environmental pollution	1	1	1	
9.	Plastic Waste Generation	Environmental pollution	1	1	1	
10	BioMedical Waste Generation	Environmental pollution	1	1	1	
11	Construction and Demolition Waste	Environmental pollution	1	1	1	This is a limited and a small scale activity on a case to case basis on expansion or rework in office area
12	Usage of Ozone Depleting Substances	Environmental pollution	1	1	1	There are no ozone depleting substances used.
13	Energy Usage	Environmental pollution	3	1	3	
14	GHG Emissions	Climate change	1	1	1	
15	Noise to surrounding community	Noise pollution	1	1	1	
16	Noise generation within the office	Hearing	1	1	1	
17	Fire	Injury	1	3	3	Fire extinguishers provided
18	Electrical Shock	Injury	1	3	3	Office safety awareness for all personnel

S No	Risk	Effect/Impact	Likelihood	Impact	Overall Risk Likelihood * Impact	Risk Mitigation Measures or control measures
19	Pressure Explosion	Injury	NA	NA	NA	
20	Cold Burn	Injury	NA	NA	NA	
21	Trip and Fall	Injury	2	2	4	Office safety awareness for all personnel
22	Logistics	NA	NA	NA	NA	
23	Indoor Air Quality	NA	NA	NA	NA	
24	Labour Rights	NA	NA	NA	NA	
25	Child Labour	Regulatory	1	3	3	Child labour prohibited
26	Forced Labour	Regulatory	1	3	3	Bonded labour prohibited
27	Discrimination	Regulatory	2	3	6	Non-discrimination policy
28	Bursting hazard due to equipment	NA	NA	NA	NA	
29	Ecosystem Services	NA	NA	NA	NA	
30	Lack of Competence	Office safety	2	2	4	Awareness on office safety for all
31	Retrenchment	Regulatory	1	3	3	HR policies for hiring and retrenchment
32	Sexual Abuse	Regulatory	2	2	4	POSH policy
33	Data Loss	Community	2	2	4	Information security and data privacy
34	Supply Chain violation of Child Labour and Forced Labour	Regulatory	1	3	1	Supply chain review to meet legal requirements

Annexure 4: Regulatory Compliance obligations, Current status and Recommendations

S.No	Act/ Rule with latest update	Current Status	Status of Compliance	Follow up Action Required
1.	The Telangana Shops & Establishment Act 1988	Compliant	Compliant	None
2.	eWaste Management and Handling Rules 2022 amended up to 8 th March 2024	The organization is currently not generating any ewaste. In the future, following are the potential avenues for EWaste 1) Rejection of hardware due to malfunction. In such a case, the product will be returned to the supplier. 2) Replacement of office equipment. In such a case the plan is to procure office equipment on "Buyback" mode for the old equipment. Thus no Ewaste is envisaged.	Compliant	None
3.	Section 24 of The Water (Prevention and Control of Pollution) Act 1974	There is no industrial wastewater generated to treat and the domestic sewage is let into the municipal sewer.	Not Applicable	None
4.	Section 21 of The Air (Prevention and Control of Pollution) Act 1981	The company does not operate any equipment or processes at the site that can lead to air pollution.	Not Applicable	None
5.	Rule 6 Hazardous and other Wastes (Management & Transboundary Movement) Rules 2016 amended till 2024	The company does not operate any equipment or processes at the site that generate hazardous wastes.	Not Applicable	None
6.	Rule 5 of Battery Waste Management Handling Rules 2022 amended up to 14 th March 2024	Replacement of batteries for UPS and laptops are not made so far and planned for "buyback" mode in the future.	Compliant	None

S.No	Act/ Rule with latest update	Current Status	Status of Compliance	Follow up Action Required
7.	Fire NOC of building	The company is situated in a 2 storied house of height < 15m for which Fire NOC is not applicable.	Compliant	None
8.	Occupancy Certificate	Occupancy Certificate No. 116974/GHMC/0401/2021/OC C. dated 11Nov21 The building constructed is not as per the approved floor plan	Non-Compliant	Communication to building owner and prepare office interior plan
9.	Certificate of Enrolment in Form 4 for Professional tax	The organization is yet to make the necessary registrations under the act.	Non-Compliant	The organization shall get the Professional Tax registration completed.
10.	Private Security Agencies (Regulation) Act (PSARA) License	No security services at site	Not Applicable	None
11.	Registration in Form 5A under Employees Provided Fund Scheme 1952	Organization has < 20 employees and hence this is not applicable	Not Applicable	None
12.	Lift approval	Telangana government is yet to formulate acts and rules for elevators in residential and office buildings. Hence there is no requirement to obtain approval.	Compliant	Work with the landlord to ensure appropriate maintenance and safety inspections for the lift as per the recommendation of equipment provider or get a technical safety assessment done by a technical expert on the matter.
13.	Equal Remuneration Act, & Rules.	The company has an equal opportunity and non-discrimination policy at work	Compliant	None
14.	Child Labour (P&R) Act 1986 & Rules.	The company has a policy of prohibiting child labour at work	Compliant	None

S.No	Act/ Rule with latest update	Current Status	Status of Compliance	Follow up Action Required
15.	Employees Compensation Act, 1923 & Rules.	The company complies with the requirement of the said Act 1923 & rules	Compliant	None
16.	Payment of Bonus Act 1965, & Rules, 1965	The company complies with the requirement of the said Act 1923 & rules	Compliant	None
17.	Complaints/Representation of Workmen, Unions and Employees.	There are no workmen category employees and union at the company	Not Applicable	None
18.	Minimum Wages Act, 1948, M.W(C) Rules, 1950	The company is ensuring payment as per the Minimum wages acts and rules	Compliant	None
19.	Contract Labour (Regulation And Abolition) Act, 1970 And Rules.	The company is not employing any contract labour in the office. All housekeeping and maintenance personnel are the responsibility of the landlord.	Not Applicable	None
20.	Maternity Benefit Act & Rules	The company complies to the requirements of the Maternity Benefit Acts & Rules	Compliant	None

Annexure 5: List of Objectives Targets and Management Programs

List of Objectives & management programs

- 1) Awareness training for all employees on ESG.
- 2) Implementation of POSH
- 3) Training in HR policies for all employees – POSH, Grievance redressal, etc.
- 4) Training on First Aid & Firefighting
- 5) Training and awareness program on waste management

Annexure 6: Corrective Actions

The following format shall be used:

REPORT on E&S ISSUES / INCIDENT	
Date of report:	
Contact details	
Description of issue (Address the points 1 to 9)	<ol style="list-style-type: none"> 1. Date and time of incident. 2. Type of incident: environmental issue, fatality or other. 3. Name of person/s involved/injured/deceased, if applicable 4. Narrative and contextual information. 5. Whether the incident was work or nonwork related. 6. Causes of incident. 7. Status of investigation. 8. Listing of parties involved in investigation (witnesses and staff, unions, police, other authorities and other parties. 9. Immediate relief is provided to the kith and kin of the deceased / injured. 10. FIR lodged and status (if any) 11. Access to resources (Legal, Local bodies, Unions etc.) for the victims. 12. Publicity (coverage in media – print and news)
Follow-up by Portfolio Fund/ Company	<ol style="list-style-type: none"> 1. Company view of incident – degree of severity, uncertainties,

	<p>or disputed facts to be investigated.</p> <ol style="list-style-type: none"> 2. Status of investigation. 3. Reports produced (and outstanding, if any). 4. Immediate actions taken by company and other parties. 5. Further actions to prevent reoccurrence of incident. 6. Monitoring/reporting arrangements to follow up on the efficacy of actions taken. 7. Results to date of actions taken.
Conclusion	<p>Next steps: whether to close the case, or proceed investigations, how to do so, and the rationale for it.</p>

Annexure 7: Management Review Team, Inputs and Outputs

Team Members

1. CEO
2. CTO
3. HR
4. E&S Manager

Inputs

- Any changes required in E&S Risk Assessment
- Any changes required in ESMP and/or any other documentation
- Incidents / Accidents occurred that impact the E&S of the company
- Resource requirements for ESMP
- Grievances received and handled
- Status of ESCAP



Outputs

- Allocation of resources
- Action

RASCI chart will be prepared and reviewed for its utility and applicability after one year as the organization is quite small to have all the resources listed.

R: Responsible, A: Accountable, S: Support; C: Consulted, I: Informed

Tasks	Chief Executive Officer	ESG Manager	HR Department	ESG Support team	Administrative Department	Employees
Implementation of ESMP						
Review of ESMP						
Assessment/ Due Diligence of New Investments						

Tasks	Chief Executive Officer	ESG Manager	HR Department	ESG Support team	Administrative Department	Employees
Legal Documentation						
E&S Risk Management						
Pollution Prevention and Control Plan						
Integrated Waste Management						
Resource Efficiency						
Occupational Health & Safety						
Emergency Preparedness & Response Plan						
Social and Employee Welfare Management						
Stakeholder Engagement						
Grievance Redressal						
Training & Capacity Building						
Monitoring & Reporting						

Annexure 8 Record Keeping

LSr.No.	Document	Owner
1	Aspect Impact List	E&S Manager
2	Legal Register	E&S Manager
3	Communication Records including Stakeholder Engagement and Grievance Redressal	E&S Manager and HR Manager
4	Recruitment Records	HR Manager
5	Training Records	HR Manager
6	Corrective Action Records including Incident Records	E&S Manager
7	Audit Records	E&S Manager
8	Management Review Records	E&S Manager

Annexure 9 Tracking of Stakeholder Engagement

Engagement Output (Positive/ Suggestion/ Grievance)	Date of Receipt	Date of Response	Any Escalation was required or not?	Any Investigation Required	Action Taken and any Follow up required

Annexure 10 Supplier code of conduct

Supplier code of conduct

INDUZ Data Solutions Private Limited (hereinafter called Induz) is committed to unyielding integrity and high standards of business conduct in everything we do, especially in our dealings with suppliers, contractors, consortium partners and consultants (collectively “**Suppliers**”). Induz bases its Supplier relationships on lawful, efficient, and fair practices, and Suppliers must adhere to applicable legal and regulatory requirements in their business relationships as set out in this Code of Conduct for Suppliers, Contractors and Consultants (the “**Code**”) in connection with their activities for Induz.

Suppliers are responsible to ensure that they and their employees, workers, representatives, suppliers, and subcontractors comply with the standards of conduct set out in this Code, all applicable local laws and regulations, and other contractual obligations to Induz.

Induz reserves the right to audit compliance with this Code of Conduct and to require that a Supplier provide supporting data on its supply chain.

You, as a supplier to Induz, agree:

Sustainable Sourcing: Induz expects Suppliers to consider environmental, social, and governance throughout the lifecycle of the relationship. The supplier shall agree to collaborate and continuously improve on sustainability in the supply chain as essential to conducting business. The supplier understands that Induz may carry out an audit to ensure performance and monitor progress.

Fair Employment Practices: To

- (i) observe applicable laws and regulations governing wages and hours, recruitment and employment contracts.
- (ii) allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by local law or regulation.
- (iii) prohibit discrimination, harassment and retaliation.
- (iv) not utilize fraudulent or misleading recruitment practices.
- (v) provide workers with terms and conditions of employment in a language the worker understands.

Environment, Health & Safety: To

- (i) comply with applicable environmental, health and safety (EHS) laws and regulations
- (ii) provide workers a safe and healthy workplace.
- (iii) not to adversely affect the local community

Suppliers to provide data from its supply chain to Induz when requested. This may include requests for regulations such as REACH, RoHS, TSCA, Prop65, and any other regulation that Induz must abide by.

Human Rights: To

- (i) respect human rights of your employees and others in your business operations and your activities for Induz
- (ii) not to employ child labour.
- (iii) not to use forced, prison or indentured labour, or workers subject to any form of physical, sexual or psychological compulsion, exploitation or coercion, or to engage in or abet trafficking in persons.
- (iv) provide supporting data on your supply chain policies/procedures for human rights when requested.

Working with Governments, Improper Payments and Dealings with Induz Employees and Representatives: To

- (i) maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery and kickbacks.
- (ii) not to engage in bribery, kickback or any other action that could be deemed as improper performance, and
- (iii) provide supporting data (of compliance) to Induz when requested.

Competition Law: Not to share or exchange any price, cost, product design or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending, or current Induz procurement.

Intellectual Property: To respect the intellectual and other property rights of Induz and of third parties, including all patents, trademarks, and copyrights.

Security and Privacy: To

- (i) comply with applicable privacy laws and regulations.
- (ii) implement and maintain physical, organizational and technical measures ("Safeguards") to protect the security and confidentiality of the data of Induz employees, customers, and suppliers (collectively, "Induz Data") in order to prevent accidental, unauthorized or unlawful destruction, alteration, modification, loss, misuse, or processing of Induz data.
- (iii) protect Supplier operations and facilities against exploitation by criminals or terrorists.

Trade Controls & Customs Matters: Not to transfer Induz technical information to any third party without the express, written permission of Induz, and to comply with all applicable trade control laws and regulations in the import, export, reexport or transfer of

goods, services, software, technology, or technical data including any restrictions on access or use by unauthorized persons or entities.

Controllershship and Tax Law: To ensure that all invoices and any customs or similar documentation submitted to Induz or governmental authorities or audited by third parties in connection with transactions involving Induz accurately describe the goods and services provided or delivered and the price thereof, to ensure that all documents, communications and accounting are accurate and honest and not to take or participate in any actions that may be viewed as tax evasion or the facilitation of tax evasion.

Signed by Supplier / Vendor accepting to the above

Sign:

Name:

Date:

Annexure 11 Checklist for Supplier E&S Evaluation

CHECKLIST FOR E&S EVALUATION OF SUPPLIERS

S.no	Area of Interest	Requirement	Response	Remarks
1	Material Sourcing	Does the supplier provide clear information about where their materials are sourced from?		
		Are there any third-party certifications indicating sustainable sourcing?		
		Are products designed with end-of-life considerations (e.g., ease of disassembly, recyclability)?		
		What measures does the supplier take to prolong the product lifespan, where necessary?		
		Does the supplier have publicly stated sustainability goals?		
		Can the supplier demonstrate an ongoing commitment to innovation in sustainability?		
		How does the supplier address quality control and assurance during production?		
2	Recycling Process	Is the supplier transparent about their recycling processes?		
		Do they have verifiable information regarding the environmental friendliness of their recycling practices?		
3	Buy-Back Process	Does the supplier offer a program to take back products for reuse and recycling?		
		What happens to the products once they are returned for recycling?		

S.no	Area of Interest	Requirement	Response	Remarks
4	Fair Employment Practices	Does the supplier observe applicable laws and regulations governing wages and hours, recruitment and employment contracts?		
		Does the supplier allow workers to choose freely whether to organize or join associations of their own choosing for the purpose of collective bargaining as provided by local law or regulation?		
		Does the supplier prohibit discrimination, harassment and retaliation?		
		Does the supplier ensure not to utilize fraudulent or misleading recruitment practices?		
		Does the supplier provide workers with terms and conditions of employment in a language the worker understands?		
5	Energy Efficiency and Carbon Footprint	Does the supplier monitor and manage energy consumption in their production processes?		
		What measures are taken to promote energy efficiency and waste reduction?		
6	Regulatory Compliance	Is the supplier compliant with all relevant environmental regulations and laws?		
		Have there been any large-scale, recent issues or violations from the supplier?		
7	Environment, Health & Safety	Does the supplier comply with applicable environmental, health		

S.no	Area of Interest	Requirement	Response	Remarks
8	Human rights	and safety (EHS) laws and regulations		
		Does the supplier provide workers a safe and healthy workplace?		
		Does the supplier ensure not to adversely affect the local community?		
		Does the supplier respect human rights of their employees and others in their business operations and activities for Induz?		
8	Human rights	Does the supplier ensure not to employ child labour?		
		Does the supplier ensure not to use forced, prison or indentured labour, or workers subject to any form of physical, sexual or psychological compulsion, exploitation or coercion, or to engage in or abet trafficking in persons?		
		Does the supplier provide supporting data on their supply chain policies/procedures for human rights when requested.		
		Does the supplier maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery and kickbacks?		
9	Working with Governments, Improper Payments and Dealings with Induz Employees and Representatives	Does the supplier ensure not to engage in bribery, kickback or any other action that		

S.no	Area of Interest	Requirement	Response	Remarks
		could be deemed as improper performance?		
		Does the supplier provide supporting data (of compliance) to Induz when requested?		
10	Security and Privacy	Does the supplier comply with applicable privacy laws and regulations?		
		Does the supplier implement and maintain physical, organizational and technical measures ("Safeguards") to protect the security and confidentiality of the data of Induz employees, customers, and suppliers (collectively, "Induz Data") in order to prevent accidental, unauthorized or unlawful destruction, alteration, modification, loss, misuse, or processing of Induz data?		
		Does the supplier protect their operations and facilities against exploitation by criminals or terrorists?		

Annexure 12 Abbreviations and Acronyms

Abbreviations	Full Form
ESMP	Environmental and Social Policy and Management System Procedures
E&S	Environmental & Social
ESG	Environment Social Governance
ESS	Environmental and Social Standards
Induz	INDUZ Data Solutions Private Limited
IFC PS	International Finance Corporation Performance Standard
ADB	Asian Development Bank
AIIB	Asian Infrastructure Investment Bank
AIF	Alternative Investment Fund
CEO	Chief Executive officer
CTO	Chief Technical officer
HR	Human Resources
PCB	Printed Circuit board
NIIF	National Investment and Infrastructure Fund
SDG	Sustainable Development Goals
IAM	Identity and Access Management
IFC	International Finance Corporation
IR	Involuntary Resettlement
IP	Indigenous People
MVP	Minimum Viable Product
POC	Proof of Concept
EHS	Environment Health & Safety
TNA	Training Needs Assessments
SEP	Stakeholder Engagement Plan

Abbreviations	Full Form
GRM	Grievance Redressal Mechanism
CA	Corrective actions
MR	Management Review
EPR	Extended Producer Responsibility
NC	Nonconformances
SaaS	Software as a Service
HOD	Head of Department
LTI	Lost time Injury
SIF	Serious injury or fatality

Annexure 13 Terms and Definitions

Abbreviations	Full Form
Loss Time Injury (LTI)	LTI are occupational injuries in the workplace (Injury during working hours or while on business or both); which prevents an employee from joining duty in the next working day or scheduled shift.
Serious Injury/ Major Accident	Any injury leading to hospitalization for more than 7 days; may or may not resulting in permanent or temporary disability. Any other incident such as fire, major spillage of chemical or fuel (>50 litres), electrocution, explosion, structural collapse; irrespective of human cost or property damage.
Dangerous Occurrence	Any occurrence which has not resulted in any bodily injury to any person. Ex: Bursting of plant under pressure/ Collapse or failure of crane, derrick, winch, or other appliance used for raising or lowering persons or goods/ Explosion, fire bursting out, leakage or escape of any molten metal, or hot liquid or gas. Explosion of receiver or container used for storage at a pressure greater than atmospheric pressure. Collapse of any floor, gallery, roof bridge, tunnel, chimney, wall, or any other structure.
Fatality	Death resulting from a work related injury, regardless of the time intervening between the incident causing death.
First Aid Case	Any work related injury/ accident with no loss of time (nonLTI), when the victim returns to work on the same day after receiving a medical aid.
Near Miss	Any event which differs from normal operating conditions (deviation) and that did not but could have caused injury or property damages under slightly different circumstance and are often attributable to any unsafe act or unsafe condition.
Near MissSIF	Any near misses with Significant Injury or Fatality (SIF) potential; meaning if it was not a near miss then definitely it would have resulted in a serious injury/ LTI or fatality and not stopped at a first aid issue or minor fire
Severity Rate	The rate at which severe reportable injuries occur at the Site. Which is = (Total Number of LTI + Serious Injury Cases in a company /200,000)/ Total man hours worked)

Annexure 14 Screening checklist for new facilities

S.no	Aspects	Status Yes / No / Not Applicable	Response / Remarks
1	What is the address of the proposed facility		
2	What is the facility type? a) Commercial zone / Residential zone b) Building type – Standalone building / High-rise building c) Location – Rural / Urban		
3	Local Authority Jurisdiction type and name? a) Municipality or Corporation b) Gram panchayat, c) industrial Authority		
4	What is the present use of the site: a) Office / Commercial establishment b) Agricultural c) Barren land		
5	Give a physical description of the property and the neighbourhood		
6	Status of land ownership: a) Owned or Freehold b) Leased c) Rented		
7	Are there any pending ESG legal cases against the building or landlord as per disclosure by landlord and or by media reports?		
8	Does the site have the relevant permits as applicable, such as: a) Shops & Establishment license b) Pollution control board approvals c) Occupancy certificate d) Fire NOC e) Electrical inspectorate approvals f) Approvals for Lifts g) Structural stability certificate h) Ground water permits i) Municipal water & sewage lines j) Security agency approvals		
9	Are adequate fire detection, prevention and firefighting facilities provided, such as Detectors, Extinguishers, hydrants, fire alarm panel, etc.		
10	Is there an emergency response procedure in place at the site?		
11	Is the premise prone to natural hazards such as cyclone, flooding, and earthquakes etc.? If Yes, describe the mitigation measures landlord has taken.		
	Name(s) of the Assessor(s)		
	Signature and Date		
	Recommendation for leasing	YES / NO / Further Evaluation required	

Annexure 15: List of References and Resources

S. No.	Department/Websites	Website Link
1.	Ministry of Environment, Forest & Climate Change (MoEF&CC)	http://moef.gov.in/
2.	Central Pollution Control Board (CPCB)	http://www.cpcb.nic.in/
3.	Telangana Pollution Control Board	https://tspcb.cgg.gov.in/default.aspx
4.	Commercial Taxes Department, Government of Telangana	https://www.tgct.gov.in/tgportal/AllActs/APPT/APPTRules.aspx
5.	Government of Telangana Labour Department	https://labour.telangana.gov.in/home.do
6.	Induz website	https://induz.io/