

**Lightstorm Data Centers
Private Limited**

**Environment and Social Management
System for Lightstorm Data Centers,
India**

Signature



Document history

Version	Revision	Author	Reviewed by	Name	Date	Comments
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Revision Updates

Revision	Date	Description of Changes	Prepared by	Reviewed by	Approved by




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Acronyms and Abbreviations

Name	Description
E&S	Environment and Social
EHS	Environmental, Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GRM	Grievance Redressal Mechanism
IFC	International Finance Corporation
O&M	Operations & Maintenance
PDCA	Plan, Do, Check, Action
PPE	Personal Protective Equipment
RoW	Right of Way

1. INTRODUCTION

1.1 Lightstorm Data Centers Private Limited

Lightstorm Data Centers Private Limited (hereinafter referred to as “Lightstorm” or “LDC” or “the company”) was established in 2019 and headquartered in Gurgaon, Haryana. I-Squared Capital (ISQ), a global infrastructure investor, has 100% shareholding in the company. Lightstorm is engaged in business of providing Operation and Management services in the field of data centre business, data centre equipments, colocation services, manage hosting services, information technology, infrastructure services, remote Help Desk, remote technical assistance centre and remote NOC services using shared or dedicated resources, remote network monitoring and related services.

1.2 Purpose of the Environmental and Social Management System (ESMS)

The broad purpose of this Environmental and Social Management System (ESMS) is to align the operations of Lightstorm in a streamlined manner and to be in conformance with the environment and social commitments made to various stakeholders. Further, this ESMS establishes Lightstorm’s commitment to put in place a framework that will guide them in managing the Environmental, Health, Safety and Social risks arising from their business activities, as well as carrying out business in a more sustainable manner.

This ESMS provides Lightstorm the framework under which they will further develop detailed policies, procedures and management plans.

1.3 Scope and Objective of ESMS

Specifically, the objectives of the ESMS are to support Lightstorm in the following:

To develop a sector focused ESMS, comprising overarching E&S policies and guidelines that will steer the EHS performance of the Company’s business towards establishing NOC/ Data Centres and acquisition of sites as provided herein;

- A. Setting up of NOC & Data Centres
- B. To establish site screening processes from E&S perspective that will enable Lightstorm to identify EHS risks at various stages of project development.
 - i. To provide tools in form of checklists and guidelines for screening, assessment and management of environmental, health and social impacts of company’s business activities;
 - ii. To develop relevant EHS and social policies and procedures to guide the Company to remain compliant with the requirements of the applicable reference framework as stated in Section 1.4;
 - iii. To define organisation structure and channelling of resources (manpower, and skills) available with the company for the successful implementation of the ESMS;
 - iv. To establish an internal monitoring protocol for the successful implementation and continuous review and improvement of the ESMS.
- C. To establish a criteria for setting up a Network Operating Centre and captive Data Centres and as further elaborated in Appendix B:
 - i. Building criteria including fire standards
 - ii. electrical & power supply
 - iii. Heating, Ventilation, and Air Conditioning system,

iv. Infrastructure for Data system.

The Environmental and Social Management System (ESMS) has been developed by Lightstorm and approved by its Board of Directors (BOD) as on **12/09/2025** and is subject for improvement when necessary.

1.4 Applicable E&S Standards and Reference Framework

The ESMS has been developed within the requirement of the following reference framework and standards:

- Applicable national and local environmental, fire safety and social laws and regulations in India (as detailed in **Appendix A**):
- Information Technology Act 2000;
- IFC Performance Standards (2012);
- World Bank Group General Environmental, Health and Safety (EHS) Guidelines, (2007);
- World Bank Group Industry Sector EHS Guidelines for Telecommunications (2007);
- ESMS Related Guidelines and Toolkits such as:-
 - IFC Environmental and Social Management System (ESMS) Implementation Handbook;
 - IFC ESMS Self-Assessment and Improvement Guide;
 - IFC ESMS Toolkit.

*Please note that detailed information of all the requirements under applicable reference framework are discussed in **Appendix A** of this ESMS.*

1.5 Applicability of ESMS and its Implementation

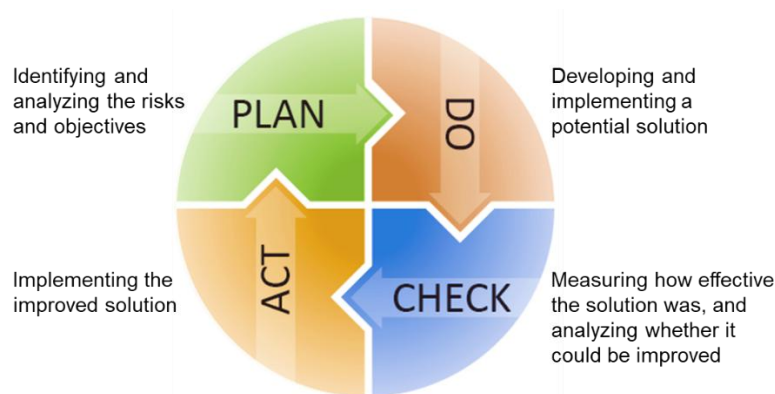
This ESMS is applicable to the business of Lightstorm, its existing and proposed projects. This ESMS is applicable to the entire lifecycle of Lightstorm's business operations. Coverage of certain aspects may have a mandate for inclusion of third-party vendors, contractors, subcontractors, etc. for management of E&S aspects during site acquisition and site development phase.

Implementation of this framework will be driven by Lightstorm's corporate management team, as detailed in **Section 3** of this document.

1.6 Governing Principle of ESMS

The governing principles of the ESMS are based on the 'Plan', 'Do', 'Check', and 'Act' cycle (PDCA). It will be ensured that the ESMS will be implemented based on the following elements:

- Establishing a policy statement with Environment and Social Commitments;
- Identifying and ensuring compliance with applicable E&S standard requirements;
- Identifying risks and developing objectives, targets and programmes/procedures for identified risks;
- Implementation and operation of ESMS;
- Checking, monitoring and review; and
- Implementation of corrective action measures.



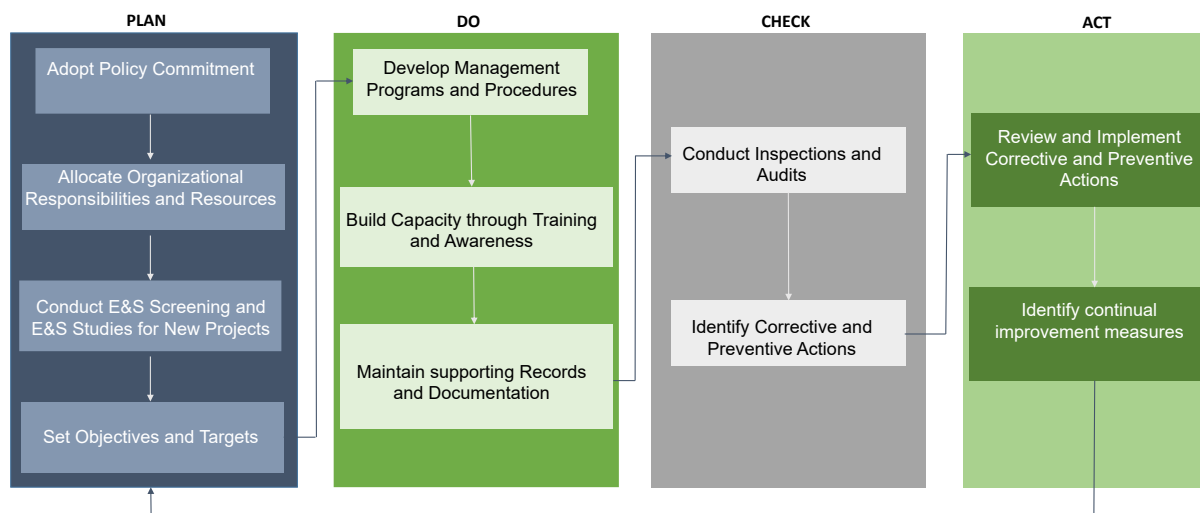
The overall E&S risk review and screening process thereby intends to:

- Determine the potential impacts of activities under the existing and future business of Lightstorm and their likelihood to cause adverse environmental and social impacts;
- Determine appropriate mitigation measures for activities with adverse impacts;
- Incorporate mitigation measures;
- Review and approve new project development; and
- Monitor environmental and social performance during development and O&M phase of such projects.

1.7 Implementation Flow and Structure of ESMS

The implementation flow, based on the PDCA cycle and depicting the interconnectivity between governing principles of the management systems has been presented in **Figure 1.1** below.

Figure 1.1 Implementation Flow of the Management System



This implementation flow and structure ensures that the ESMS conforms to specified requirements, regulatory aspects and manages as well as monitors all environment and social risks and impacts associated with Lightstorm's project development cycle.

1.8 Update and Modification

Lightstorm is the sole proprietor of this ESMS Policy and is responsible for its periodic updating or modification as per requirement. Changes may be required in the following situations:

- Changes in any applicable environment and social regulations or standards in India, pertaining to the activities related to data centre & site acquisition (list of such regulations provided in **Appendix A**);
- Revision in the scope of ESMS procedures to address emerging social and environmental risks during project implementation.
- Any changes in the institutional setup for the implementation, training or monitoring for this ESMS at Lightstorm.

This ESMS will be reviewed periodically to ensure that it remains relevant and in alignment with operations of Lightstorm and other external factors, such as changes in local policies and lenders' requirements. Changes to this ESMS shall be vetted by the E&S Lead and will require a formal approval from the Chief Executive Officer (CEO). Relevant parties such as Investors (as may be applicable) and relevant departments engaged in ESMS implementation need to be subsequently communicated about the changes and the approach to its implementation post any updates and modification.

Management of change procedure as provided in **Appendix N**, shall be implemented to record any changes that trigger the ESMS review and updating. Records will be maintained accordingly.

1.9 Document Control

The document control procedure is aimed at defining requirements for document control and ensuring completion of document review process prior to issue of revised documents related to the ESMS. The scope of these requirements will apply to the control of distribution, copies, and locations of all documents and forms managed by Lightstorm in relation to this ESMS.

The following definitions should be noted with respect to document control:

- Document refers to policies, standard operating procedures, standards and regulations, or any work instructions identified to meet compliance related to ESMS. Such documents may be in paper or electronic form.
- Forms (records) refers to pre-defined documents used for recording EHS and Social related information or data from ongoing operations at Lightstorm.

The E&S Lead will be responsible for assuring control of E&S related documentation including establishing document controls, making amendments, revisions, issues and circulation of ESMS. Additionally, all staff at Lightstorm are responsible for adhering to the document control requirements to assure that controlled documents are appropriately used, updated, and distributed in accordance with this procedure. The E&S Lead, through the Project team, will ensure that the Contractors adopt and implement requirements outlined in these procedures during installation / deployment and O&M phase.

The following requirements are to be implemented with respect to document control:

- E&S Lead to initiate a revised document to reflect changes if any in the applicable law;
- A draft document of this ESMS shall be submitted by E&S Lead to the CEO for approval. After approval, the ESMS shall be enforced for implementation;
- All changes to the ESMS procedures shall be submitted as drafts to the ESMS committee for approval and original version shall be maintained in case of any changes to existing procedures / policy;
- The E&S Lead shall maintain the E&S and related procedures and formats (provided in annexures) as a soft copy unless until deemed appropriate for hard copies for information disclosure;
- The ESMS will be strictly controlled for any form of circulation. It is to be noted that all printed copies will be uncontrolled. However, the hard "controlled" copies of the ESMS and the procedures, shall be marked as a "Controlled Copy". "Controlled copies" in soft form may also be accessible through the internal communication link or other electronic media within Lightstorm.

- Revision history of all documents shall include the current document name, revision number, existing number of controlled copies. Only the latest version number shall be valid for circulation and use.
- To record ESMS Policy revision updates, description of modifications and sign-off, following format shall be maintained:

Rev No.	Date of Release	Description of Changes	Prepared By	Reviewed By	Approved by

- The E&S Lead shall notify employees of the changes made to the ESMS Policy and procedures through their respective departmental heads.

2. ENVIRONMENT AND SOCIAL POLICY

Lightstorm commits to compliance to the Applicable E&S Standards and Reference Framework (refer to **Section 1.4**) and enhancement of E&S Performance of the company through implementation of responsible E&S management processes and preventive measures in order to avoid, eliminate, control, minimize and mitigate environmental and social risks and impacts across existing and future projects.

This policy is applicable to all of Lightstorm's existing and planned projects. The E&S policy is further applicable to all direct employees and contract workers of Lightstorm as well as their contractors, vendors and suppliers. In addition, Lightstorm will ensure compliance to the customer's EHS requirements as agreed in project specific contracts executed with them.

2.1 E&S Policy

Lightstorm shall conduct its operations in a manner that ensures compliance with legal requirements and meets the highest level of commitment towards protection of people and environment. Lightstorm shall strive to safeguard the environment and natural resources and promote resource efficiency in its operations. Lightstorm will aim to achieve this through the following commitments:

- Ensure that all activities undertaken by the entity are in compliance with the Applicable E&S Standards and Reference Framework, including applicable national regulations. - All Projects and business to be conducted within the purview of the **Appendix J** – Project Exclusion List.
- Select suppliers and contractors, including sub-contractors, keeping in view their ability to operate in environmentally and socially responsible manner, and to provide safe and healthy work environment to their employees and workers, in compliance with this policy, other applicable Policies, the Environmental and Social Management System and specific Environmental, Health, Safety and Social contractual requirements.
- Identify and assess E&S risks and impacts and mitigate and manage those in accordance with Reference Framework.
- Protect the environment against impacts generated as a result of activities across projects, as well as unplanned events, by effectively implementing mitigation measures and robust Environmental and Social Management plans proportionate to the specific risks and impacts identified and assessed and ensure that residual impacts are in compliance with the Reference Framework (Section 1.4 of ESMS Policy).
- Develop occupational health and safety and emergency response related awareness amongst contractors, including sub-contractors, as well as direct and indirect employees and workers engaged by and for the company, to prevent occurrence of accidents (personnel injuries and property damage) and occupational diseases.
- Safeguard the interests of stakeholders and affected communities through periodic engagement, participation and information disclosure, and effective management of grievances resulting during project implementation and operations as well as unplanned events related to projects.
- Ensure that wherever applicable, compensation and benefits are provided to affected communities as per applicable Reference Framework and any livelihood impacts are appropriately mitigated.
- Allocate necessary resources to plan and implement effective training programs to create within the organization.
- Establish and implement a continual monitoring and review system for effective implementation of the policy and management system by conducting timely audits and implementing corrective action measures.

2.2 Other Policies

In addition to the above E&S Policy, Lightstorm has adopted various policies which encompass the company's mission and vision to execute work with excellence while maintaining the highest standards of quality, safety, international environment benchmark and ethical behaviour.

These policies are:

- Code of Conduct and Ethics Policy
- Anti-Bribery and Anti-Corruption Policy
- Prevention of Sexual Harassment Policy
- Whistle Blower Policy
- Recruitment and On-boarding Policy
- Human Resources Policy

For contractors, vendors and suppliers, Lightstorm has following policies:

- Code of Conduct for Third Party Policy
- Anti-Bribery and Anti-Corruption Policy for Third Party

2.3 Signing Authority and Policy Disclosure

The aforementioned corporate policies shall be attested by the senior management authorised personnel to implement the commitments made through these policies at each and every stage of project implementation. All employees are expected to conduct themselves in accordance with the spirit of the aforementioned policies. Furthermore, the E&S Lead and Human Resources Head have the authorities to amend these policies. The amended versions shall further be circulated to the ESMS Committee.

The E&S Policy shall be adopted by Lightstorm for all its projects and also communicated to its contractors for their adoption and implementation at Lightstorm projects. The contractors will be required to communicate the applicable requirements of the Policy to their sub-contractors. Ongoing communication on the requirement under the E&S policy and ESMS will be included as a core component in the induction process for new employees.

The signed policy shall be stored centrally on HRMS Portal.

3. ESMS ORGANISATION STRUCTURE, ROLES AND RESPONSIBILITIES

3.1 Context

Lightstorm will establish an institutional structure for effective and consistent implementation of the ESMS. This includes the identification of designated personnel at Lightstorm or hiring of new personnel who will be in charge of effective implementation and roll out of this ESMS at all levels of the Company.

The ESMS Committee will be overall responsible for driving the execution of the ESMS across levels. The ESMS committee will be the governing, review and approval authority. The composition of ESMS committee will be as follows:

- Chief Executive Officer (CEO) (who will chair the Committee)
- E&S Lead (who will be the Member Secretary of the Committee)
- Chief Operating Officer
- Chief Technology & Innovation Officer
- Deputy Chief Operating Officer
- General Counsel
- Head HR
- Head SCM
- Head NOC

Figure 3.1 illustrates the proposed organization to be put in place for ESMS implementation and coordination.

Figure 3.1

Organogram – ESMS Implementation

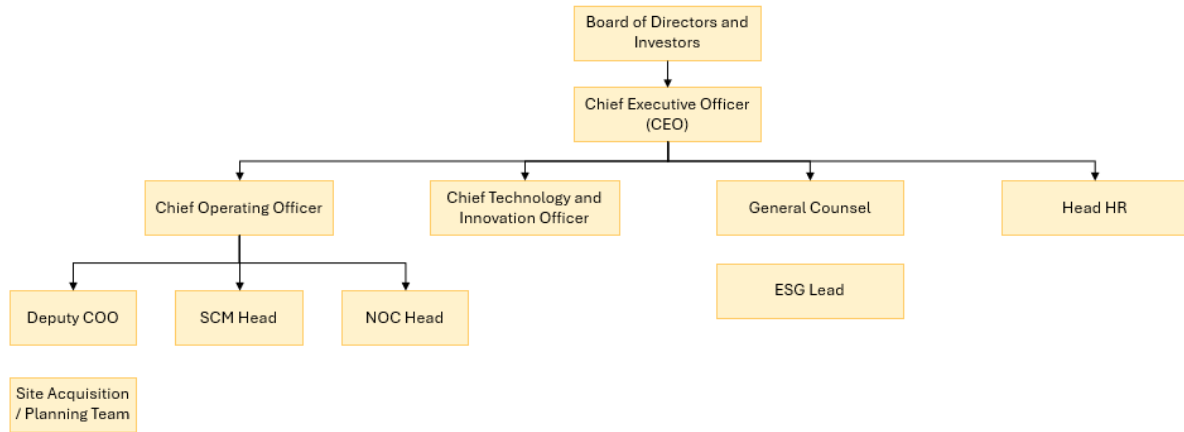
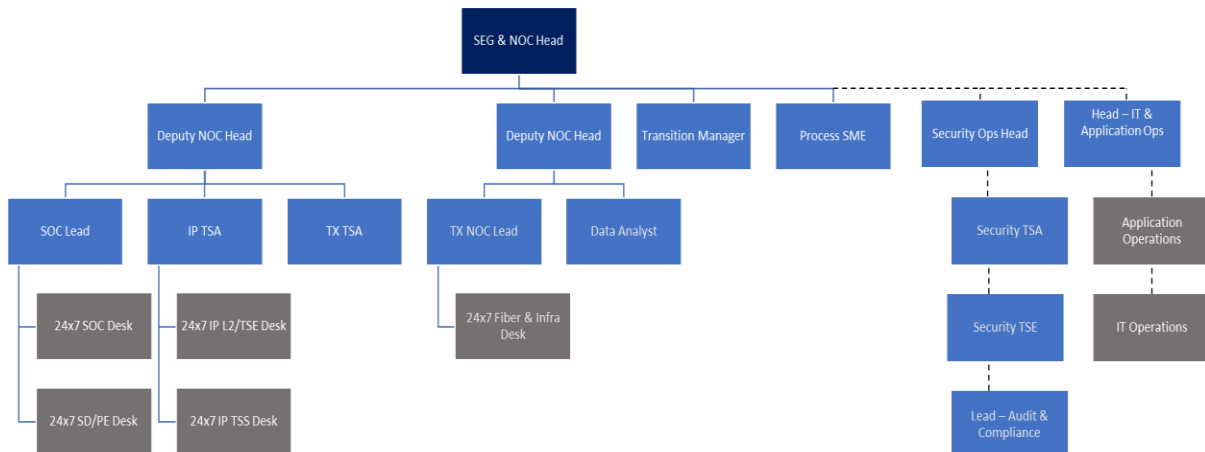


Figure 3.2

NOC Organogram – ESMS Implementation



TSA/L3: Technical Support Adviser
 TSE/L2: Technical Support Expert
 TSS/L1: Technical Support Specialist

3.2 Organisation and Responsibilities

Lightstorm will allocate resources (e.g. human resources, technology resources and other resources as required) essential to the implementation and control of the ESMS. The CEO will be accountable to investors and shareholders for compliance of Lightstorm's operations to meet the requirements of the ESMS across all levels, while the E&S Lead will be responsible for driving the implementation in coordination with other teams.

This section broadly defines the role of each team and their responsibilities towards ESMS management across Lightstorm's business. These roles will need to be updated and modified per requirement basis (since ESMS will be a dynamic document).

3.2.1 ESMS Committee

The ESMS Committee will be collectively responsible for overseeing the general implementation of this policy and procedures across all business activities of Lightstorm. The main roles and responsibilities of the ESMS Committee are laid down below:

- Facilitate appointment of key environment and social personnel at various levels based on requirement;
- Advise the Board / Investors on matters related to significant material E&S issues identified early during business development/ project identification process, and provide recommendations accordingly;
- Oversee the implementation of ESMS at project levels through bi-annual meetings and review of periodic E&S reports;
- Issue directions to the key teams on ESMS policy commitments, principles, ESMS resourcing and capacity building needs, contractor engagement and E&S management measures;
- Review Company's E&S goals and KPIs for effectiveness and apprise investors on the overall ESMS performance of Lightstorm;
- Review and approve correction or appends (as may be necessary) to ESMS Procedures; and
- Undertake annual review of the ESMS document and updates if deemed necessary.

3.2.2 Chief Executive Officer (CEO)

Responsibilities of the CEO, who will be accountable for compliance of Lightstorm's operations to meet the requirements of the ESMS, are provided below:

- Ensure that the E&S Policy is approved and effectively communicated to relevant stakeholders, and provide directives for implementation and fulfilment of policy commitments;
- Ensure that E&S roles and responsibilities are properly defined, understood and carried out at all levels within the organisation;
- Ensure that adequate resources are provided for effective implementation of the ESMS;
- Report progress of ESMS implementation to the Investors/ Shareholders/ Lenders;
- Disclose information on material ESMS aspects to other stakeholders as required, on periodic basis; and
- Review and approve correction or appends (as may be necessary) to ESMS Procedures so as to meet requirements of the Applicable Reference Framework and fulfil ESMS policy objectives.

3.2.3 NOC Team

The team led by NOC Head will primarily be responsible for:

Network Operations Centre

- Manages Network and Security Incident from monitoring, troubleshooting and Resolution.
- Management and execution of planned network activities.
- Network performance improvement and chronic problem resolution.

Service Operation Centre

- Manages customer communication, reporting and escalations.
- Customer service monitoring and service incidents resolution.
- Support new services provisioning and activation.

IT Operations

- Office IT infrastructure Management.
- OSS and BSS and Cloud Infra Management daily operations through well-defined process framework which is described briefly.

3.2.4 Site Acquisition Team

The Site Acquisition team has been assigned the responsibilities as below:

- Identification of Site per the Customer's requirement.
- Acquisition of the said site including finalization of land, conducting legal diligence, and getting the lease deed/sale deed registered.
- In case of an agricultural land, work with land owner to get the said land converted towards commercial usage, getting the zoning and building permissions/NOC from the various applicable authorities.
- Provisioning of power supply at Site post site acquisition.

3.2.5 E&S Lead

The E&S Lead is currently assigned the additional responsibility for overall implementation of the ESMS. The responsibilities have been elaborated upon below:

- Ensuring compliance of operations of Lightstorm with respect to the applicable national laws, rules and regulations, permits pertaining to Environmental, Safety, Health and Social as well as international best practices.
- Assist the site acquisition team in screening projects for identifying potential environmental and social risks early in the project development process.
- Assist the Admin team to support practices in lines with industry standards, conducting of fire drills to avoid environmental and social risks.
- Assess ESMS compliance adequacy through review of performance reports generated at project level and validate corrective measures if any, track and monitor the closure of corrective actions, and report to the ESMS Committee on the performance.
- Prepare correction or appends (as may be necessary) to ESMS Procedures so as to meet requirements of the Applicable Reference Framework and ESMS policy objectives.
- Understand the present capacity of the existing teams in terms of ESMS management and advise HR Team on addressing those gaps through recruitment, training and capacity building.

- Advise the SCM team on selection of contractors & suppliers based on ESMS criteria and assist them on evaluation of contractors & suppliers.
- Communicate effectively with site acquisition team and O&M team regarding ESMS policy, inspections, accidents and incidents, ensuring that accidents and dangerous occurrences are reviewed and responded.
- Ensure that respective Site HSE representatives conduct periodic physical inspection of under-construction and operational projects to identify safety hazards, note environmental and labor practices, and record all conformities and non-conformities in accordance with the applicable ESMS SOPs (presented in Appendix) in an inspection report.
- Ensure that stakeholder (community) engagement processes and external grievance redressal mechanisms are implemented onsite for each project, and related issues are adequately addressed.
- Inform and consult with external E&S Specialists and consultants as and when necessary; and
- Prepare E&S Reports for Investors / Lenders and other stakeholders, as necessary.

3.2.6 Site HSE Representative

Only in respect of sites, one of the site team members will be identified as HSE Representative who will be responsible for the following tasks:

- Maintain records pertaining to E&S implementation as per list of requirements outlined in ESMS procedures and applicable E&S regulatory requirements (as per Section 4.3);
- Track the implementation arrangements against E&S permit conditions on regular basis and maintain necessary compliance documents;
- Ensure implementation of measures outlined in ESMS and any corrective actions from internal/ external audits, and report to E&S Lead on the progress.

3.2.7 Head SCM

The Head SCM is responsible for selection and on-boarding of vendors i.e. contractors and suppliers for providing various services to Lightstorm. Pertaining to ESMS implementation, following responsibilities are to be implemented:

- Undertake selection of contractors and suppliers through review of past E&S performance and compliances, as may be applicable to respective contractor and supplier basis category of supply and service;
- Communicate specific E&S requirements as a policy to Vendors/Contractors;
- Include E&S covenants (terms and conditions) in contracts / purchase orders executed with vendors pertaining to the nature of service being provided;
- In addition to existing evaluation mechanism implemented by Lightstorm, undertake evaluation of the performance of vendors on the basis of E&S as one of the criteria, by taking required inputs from the project teams.

3.2.8 Human Resources Head

Specifically, the HR Head shall ensure that all social aspects relating to hiring of employees, contract workers and internal grievance redressal processes are managed effectively as per the policy commitments. Apart from this, the HR Head shall also be responsible for documenting regulatory compliances as per the applicable labor laws. Other responsibilities include:

- To establish and outline HR Policy and Procedures whilst incorporating HR framework and labor requirements as per country laws.

- To establish and implement the grievance redressal system for both direct and for third party workers.

3.2.9 HSE Representative of Contractor

During deployment and maintenance works being undertaken for a project, the contractor (including any sub-contractor engaged by them) will be required to depute at least one HSE representative for overall supervision, management and reporting with respect to environment, safety and social aspects. The person deputed shall be competent to predict, identify and control any environment, safety or social risks and hazards associated with the onsite project implementation activities, and accordingly report to the Site HSE Representative of Lightstorm.

Specific responsibilities of the contractor's HSE Representative in terms of supporting the ESMS implementation, will include following:

- To instruct onsite workers and communicate relevant information and compliance requirements.
- To assess whether any subcontractor engaged by the contractor effectively complies with the applicable E&S requirements.
- To extend Lightstorm's E&S Policy commitments to their subcontractors and provide induction training to representatives or site supervisors of the subcontractor for further dissemination to contractual workers.
- To continuously monitor the ongoing project works carried out by contractor team and subcontractors and maintain necessary records.
- To conduct walk-through inspections at deployment areas to identify non-compliances with respect to procedural and regulatory requirements and implement corrective actions as necessary.
- To submit the periodic progress reports and E&S monitoring reports to Lightstorm as per ESMS requirements.

3.3 RASCI Matrix

There are various activities that Lightstorm needs to execute as part of the ESMS implementation. The subsequent table has listed down these activities through a RASCI Matrix / Chart. This chart gives an illustration to depict what needs to be done, by whom and who should be accountable for the same as outlined through the roles and responsibilities listed above.

Lightstorm will be required to **develop the RASCI matrix for each Project** and highlight the roles and responsibilities to implement the applicable procedures based on a risk assessment process.

Colour Codes	Heading	Description
	R - Responsible	Who is responsible for carrying out the entrusted task?
	A - Accountable (also Approver)	Who is responsible for the whole task and who is responsible for what has been done?
	S – Support	Who provides support during the implementation of the activity / process / service?
	C – Consulted	Who can provide valuable advice or consultation for the task?
	I - Informed	Who should be informed about the task progress or the decisions in the task?

Table 3.1 RASCI Matrix

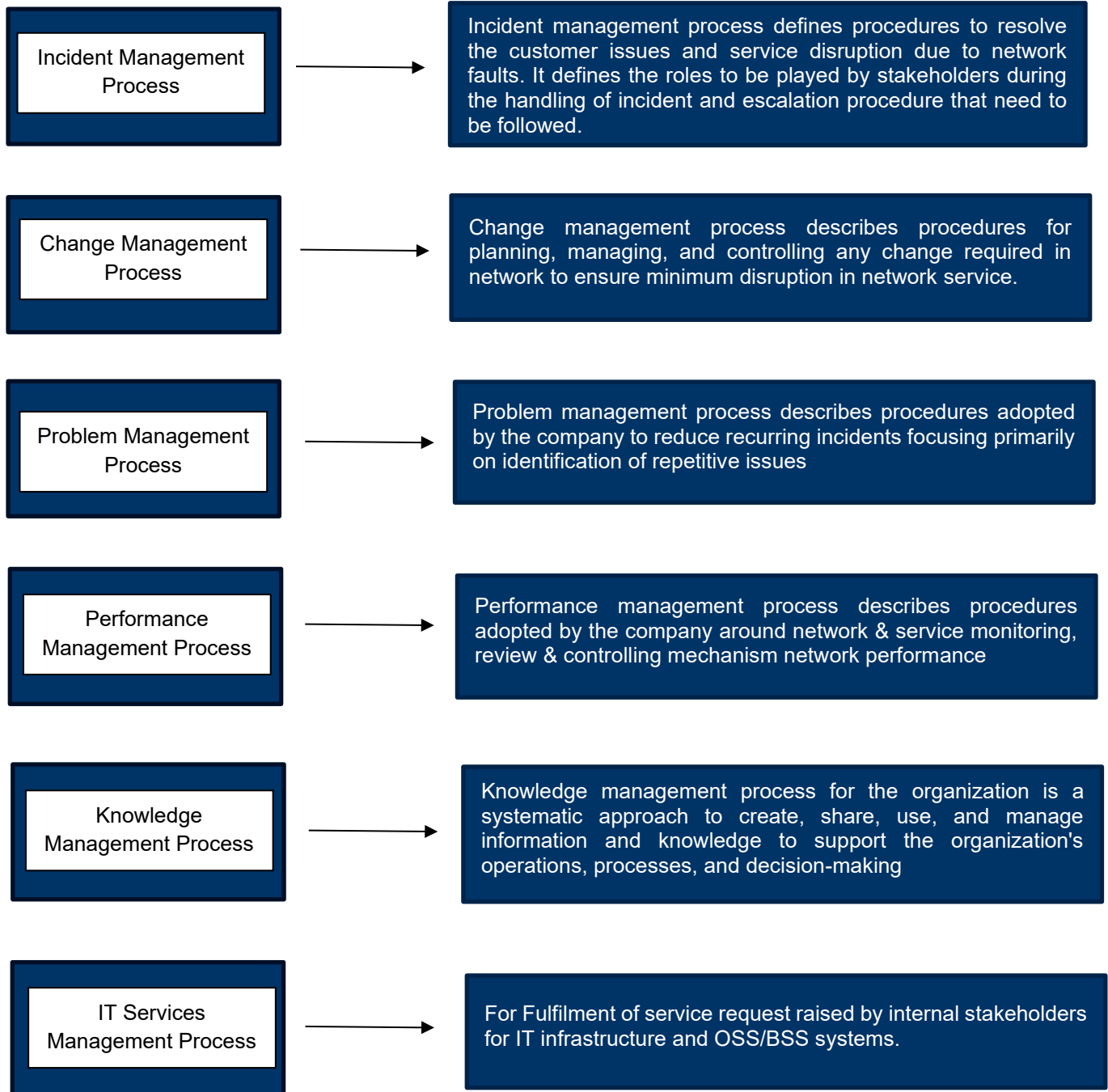
Activity for ESMS Implementation	ESMS Committee	CEO	E&S Lead (including GC)	HR Lead	SCM Lead	Operations and planning team (including COO)	Site HSE Representative	Contractor HSE Representative
Approval and disclosure of the ESMS	A	R	S					
Establishing an ESMS Committee		A	R	S	S	S		
Capacity Building related to E&S aspects	A	I	R	C	C	I	I	I
E&S Screening for new projects		I	R	C	S	R		
Financial and Board Approvals based on E&S Screening outcome	A	A	S			R		
Implementation of ESMP and other ESMS Procedures	A		A	S	S	R	R	R
Selection and On-boarding of Vendors and Contractors	I	S	S	S	A	C		
Coordination of EHS Trainings	C	S	A	R	C	I	I	I
Monitoring ESMS Implementation at Project level	I	I	A	I	C	C	R	S
Physical inspection of the project sites to identify E&S hazards and risks	I		A	C	C		R	R
Periodic review of contractors/ subcontractors' compliance to contractual agreements	C	I	A	S	R	C	R	R

Activity for ESMS Implementation	ESMS Committee	CEO	E&S Lead (including GC)	HR Lead	SCM Lead	Operations and planning team (including COO)	Site HSE Representative	Contractor HSE Representative
Periodic E&S Reporting from Project level to Corporate	I	I	A	S	S	S	R	R
Periodic E&S Reporting to Investors	A	A	R	S	S	S		
Review and Updating of ESMS	A	A	R	S	S	S		
Documentation Control	A	I	R	S	S	S		

4. OVERVIEW OF OPERATIONS AND ASSOCIATED E&S RISKS

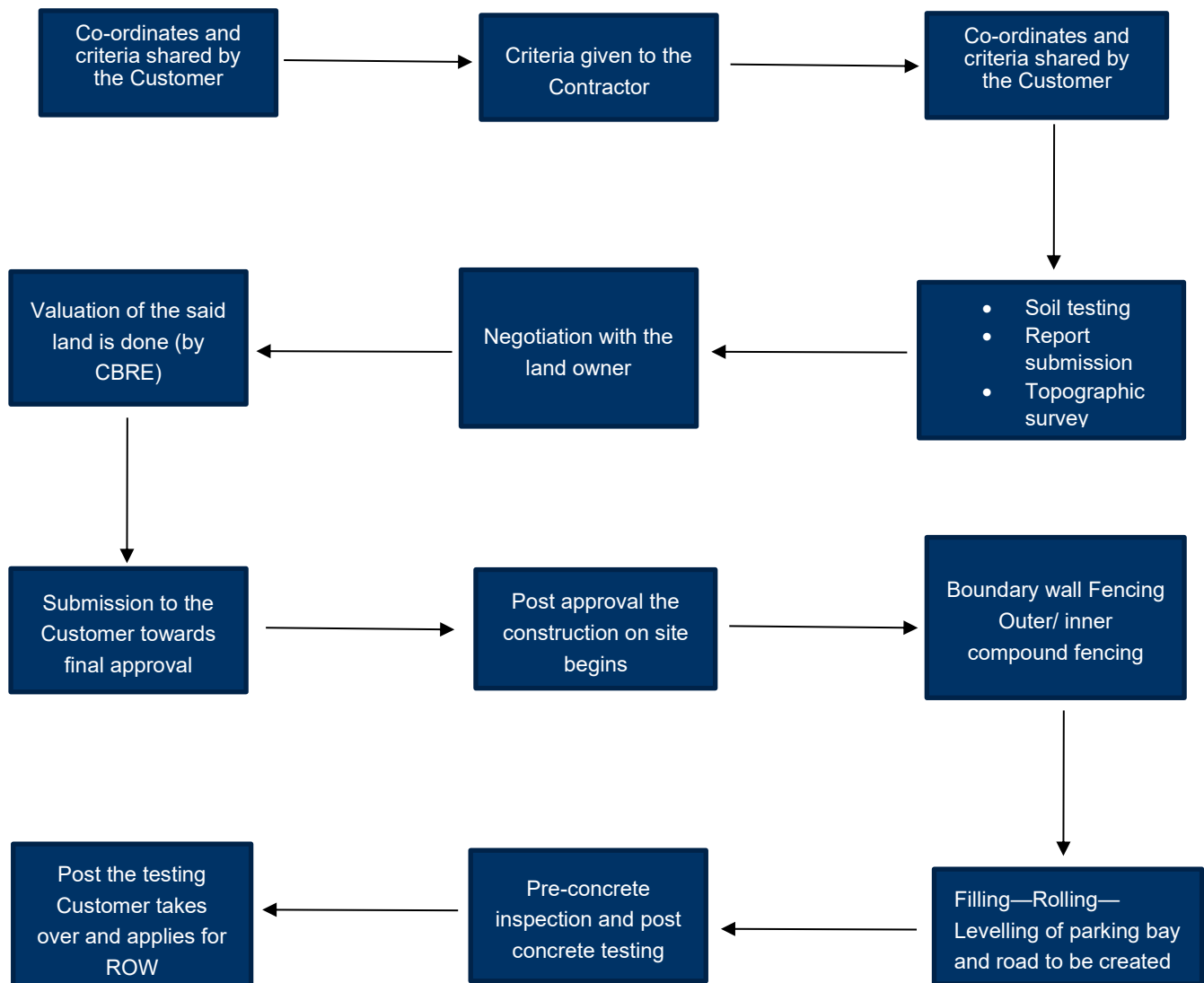
4.1 Business Overview and Model

4.1.1 NOC Framework



4.1.2 Award of Work and Project Planning

SITE ACQUISITION- The stage wise activities undertaken by Lightstorm during selection of site and constructing are further elaborated below



4.1.3 Project Execution or Deployment

Lightstorm enters into contract with various contractors and suppliers for all activities including procurement, construction, commissioning and handover of the Project. The contractors are typically responsible for engagement of workforce, procurement of materials, management of wastes, provision of site safety arrangements at installation sites, and reporting to Lightstorm on various aspects. Lightstorm's project team supervises all onsite activities being undertaken by the contractors.

4.2 E&S Risk screening for New Projects

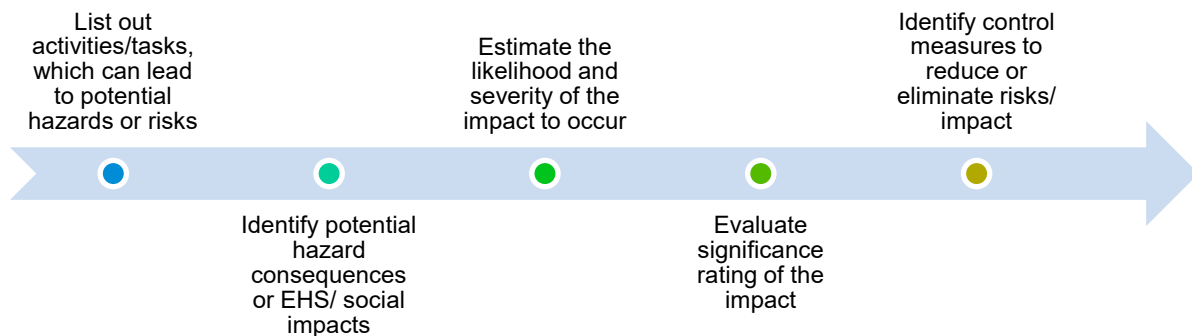
The Environmental and Social risk screening process for future projects of Lightstorm is based on typical nature and magnitude of the impacts that can occur while implementing such projects. It has been assessed that the environmental and social impacts will be localized, reversible and temporary in nature, especially during project development and installation stage. However, risks to be avoided by adhering to basic prerequisites with focus on air/water quality, avoidance of pollution, and hazardous risk and preparing a comprehensive Environmental and Social Management Plan (ESMP) is required to be implemented in order to manage the construction and O&M related impacts.

4.3 Procedure to Identify Environment and Social Risks and Impacts

The key environmental and social risks that may emanate during Lightstorm's undertaken activities lifecycle are taken into consideration for preparation of the ESMS. Though the aforementioned type of activities will be undertaken by Lightstorm and its contractors, there are risks that are required to be managed through various stages. The management and addressal of these identified risks will be done through guidelines, standard operating procedures (SOPs), tools, checklists and other implementation measures provided in Annexures.

It will be critical to identify environment and social risks and impacts for all project activities on an ongoing basis, depending upon the change in project activities or types. The objective will be to determine the measures required to comply with relevant legislations and thereby reduce the level of environmental damage, social impacts, occupational injuries and health hazards.

The risk assessment process will be based on the task/ activity being carried out and will comprise of following steps:



- All the potential impacts which may pose risk to environment, health and safety, and social aspects shall be identified through study of the following:
 - ESMS policy commitments and applicable reference framework;
 - Records of any incidents onsite;
 - Reports from audits and site inspections;
 - Inputs from staff, workers and public; and
 - Good industry practices.
- Hazards and impacts shall be classified as physical, chemical, biological and occupational based on the risks they pose on human receptors, environmental components and community.
- The risk within each activity shall be evaluated by determining its likelihood, exposure level of the receptor and consequence of the exposure.
- The rating given will be calculated following a chart score of severity of the impact rated low, moderate, high and the likelihood of the impact occurring rated negligible, unlikely, likely and certain

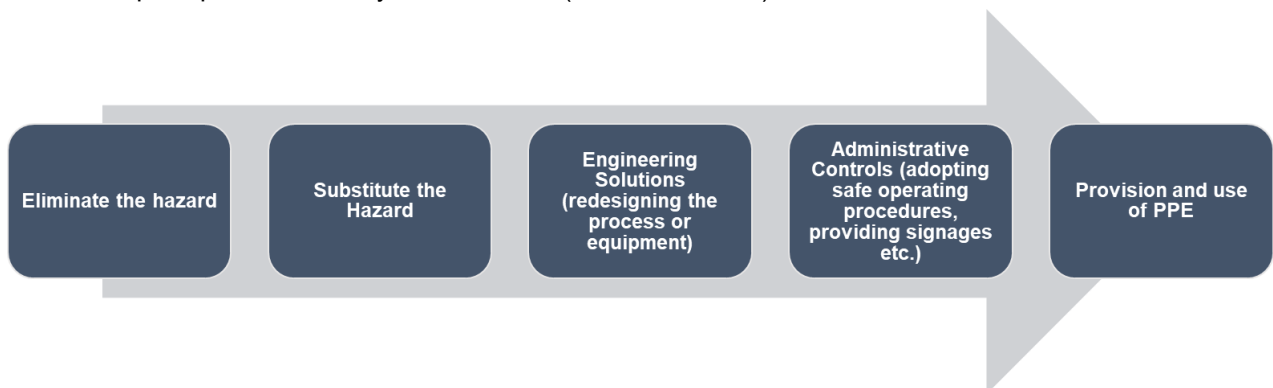
where low/negligible will not result in a significant impact to high/certain leading to critical damage to the environment or social component. The items will be determined as follows:

- Green = low impact significance
- Yellow – medium impact significance
- Red = high impact significance

Table 4-1: Impact Significance Rating Matrix

	Severity			
		Low	Moderate	High
Likelihood	Negligible	Low	Low	Medium
	Unlikely	Low	Low	Medium
	Likely	Medium	Medium	High
	Certain	Medium	High	High

- A Significance Rating will be assigned for every hazard or impact identified. Using the matrix provided above in **Table 4.1**, and an E&S Risk Register will be prepared.
- Control measures must be accordingly identified for the impacts, particularly under moderate and high categories. When evaluating existing control measures, consideration will be given to methods that will reduce the exposure, or the severity of impact or a combination of the two. If existing control measures are not deemed to be satisfactory to reduce significance rating to an acceptable level then further control measures will be considered to reduce the risk. Control measures will be based on the principle on hierarchy of risk control (as shown below).



- E&S Risk Register will be developed for each Project of Lightstorm by the Site HSE Representative, through inputs from Project Team. The risk register will be reviewed and updated on an ongoing basis by the Site HSE Representative for respective projects. The entire process will be overseen by the E&S Lead.

5. TRAINING AND CAPACITY BUILDING

This section defines the EHS training and capacity building requirements for Lightstorm team. In addition to the trainings identified in this section, subsequent EHS training requirements for newly recruited staff and existing staff of Lightstorm will be identified by the E&S Lead in coordination with the HR Head and Site Acquisition Lead. Accordingly, an annual training plan will be prepared and the same will be submitted to the ESMS Committee. Necessary trainings and capacity building sessions will accordingly be undertaken, either internally or through external experts. The E&S Lead, in coordination with Project team and Operations team, will ensure that the job specific trainings and EHS induction training needs are identified based on the specific requirements of the ESMS procedures, regulatory framework and existing capacity of the team.

5.1 Mandatory Trainings

Some of the specific trainings that will be carried out on routine basis have been provided in the table below.

Table 5.1 Mandatory Training Requirements

S. No.	Type of Training	Implementation Responsibility	Frequency
1.	EHS Induction Training on implementation of ESMS, policy and related procedures	E&S Lead	Once during induction for new joiners
2.	Environment, Health & Safety and Social Management Plans, guidelines and procedures	E&S Lead and Site HSE Representative	Annual for all employees and staff at corporate level
3.	Training of security personnel on behavioural aspects	Site HSE Representative	Annual for all site level security personnel
4.	General safety trainings – ■ Use of PPEs; ■ Accident / incident reporting and investigation; ■ Permit to work; ■ Confined space entry ■ Job hazard analysis; ■ Electrical safety	Project team and Site HSE Representative	Annual for all field staff, including contractor's workers/ staff engaged for Lightstorm projects
4a.	Emergency Response and Preparedness (Part of General safety training)	E&S Lead and Site HSE Representative	Annual for all field staff, including contractor's workers/ staff engaged for Lightstorm projects
4b.	Stakeholder engagement and grievance management (Part of General safety training)	E&S Lead and Site HSE Representative	Annual for all employees and staff at corporate level

The above listed trainings are the mandatory trainings, which will be covered during induction stage once the employee/worker joins the company. Post that, annual refresher trainings will be undertaken.

Any other applicable training will be identified and implemented as per the need assessment, as part of mitigation measure and capacity building of the staff.

In addition, general environmental awareness will be increased among the staff and workers to encourage the implementation of environmentally sound practices and compliance requirements. This will help in minimising adverse environmental impacts, compliance with the applicable regulations and standards, and achieving performance beyond compliance. The same level of awareness and commitment will be imparted to the contractors and sub-contractors prior to the commencement of the any works.

6. REPORTING, MONITORING, VERIFICATION AND REVIEW

This section provides procedures for performance monitoring of Lightstorm's operations, along with protocols to be adopted for internal and external reporting, and E&S Monitoring requirements.

6.1 E&S Performance Monitoring and Measurement

6.1.1 Legal and Regulatory Compliance Monitoring

Lightstorm will ensure that project specific legal register/ digital repository should be available for each project, that will include details of the existing permits and licenses, their validity and next renewal date, conditions stipulated under the particular permit, and how the project is complying with the condition. Any non-compliances will be immediately identified and corrective action will be taken accordingly.

6.1.2 Internal E&S Monitoring

In order to monitor project's performance, the following aspects will be checked as part of the internal E&S Monitoring by Site HSE Representatives:

- E&S Monitoring conducted at the site shall broadly assess the following:
 - Compliance to commitments and implementation of E&S measures prescribed in the SOPs.
 - Documentation and record keeping (to be maintained by Site HSE Representative and approved by E&S Lead);
 - Implementation of previous corrective action plans and measures;
- The findings shall be captured as per the checklist in **Appendix K**. A corrective plan shall be prepared and attached as part of the audit report and a time bound action plan is to be implemented for addressing non-conformances.
- The following are to be assessed during the internal E&S Monitoring as maybe applicable:
 - **Environment:**
 - Compliance reports filed periodically with regulators (as applicable at Project level);
 - Pollution management measures and implementation status;
 - Records pertaining to root cause analysis of any environmental accidents;
 - Minutes of meetings and records of corrective measures prescribed for avoiding such accidents;
 - Additionally, training documents for relevant staff to be reviewed also include training records;
 - **Health and Safety:**
 - Review logs of accident/incidents onsite along with corrective action plans prescribed;
 - Check for records maintained on Emergency Preparedness and Fire Prevention, Special Equipment and operation permit amongst other records;
 - Provision of appropriate sign boards/PPEs (as applicable);
 - Training records pertaining to behavioural aspects to be maintained onsite, basic first aid training, safety measures to be practiced during specific works such as confined space works, hazardous works, and work at heights amongst others.
 - Examine sites emergency response procedures as well as training logs that indicate workers have been trained on identified issues/emergencies. Review records pertaining to mock drills and ensure timely execution of such drills in accordance with schedule.

- **Monitoring and review of social aspects:** HR Head is primarily responsible for overseeing social aspects. They shall ensure the following aspects are reviewed:
 - Grievance management and resolution: Documented complaints, communications, records and logs of grievance handling (online and offline mode), records for resolution of grievance handling;
 - Working conditions: Contracts for workers engaged onsite, wage records, benefits, personnel files, payroll records, criteria used to set performance pay bonuses, employment and termination records

6.1.3 External E&S Monitoring

- Lightstorm shall aim to engage a competent third party consultant/agency to undertake **external E&S Monitoring of its business activities and projects.**
- The scope of external monitoring shall entail independent verification of environmental, health & safety and social aspects of the projects. The reference framework for the assessment shall cover:
- Applicable local and national environmental and social regulations; including:
 - IFC Performance Standards on Environment and Social Sustainability (2012);
 - World Bank Group (WBG) Environment, Health and Safety (EHS) General Guidelines, 2007;
 - A review of the implementation of ESMS Procedures;
 - Developing a Corrective Action Plan (CAP) incorporating timelines and recommendations to address gaps / issues identified during the assessment exercise.

6.1.4 E&S Monitoring Schedule

Following monitoring and EHS&S Monitoring schedule will apply:

Table 6.1 E&S Monitoring Schedule

S. N.	Type of Audit	Frequency	Responsibility
1.	Routine inspections and monitoring	Monthly	E&S Lead or Site HSE Representative
2.	Internal E&S Monitoring v	Annual	E&S Lead or Site HSE Representative
3.	External E&S Monitoring	Once in 2 years	External third-party consultant

At a given point of time, the overall monitoring responsibility of company's E&S performance will lie with the E&S Lead. An E&S Monitoring schedule will be developed for each project and communicated to the respective Project team. The findings of the E&S Monitoring will be shared with the ESMS Committee in form of report (Internal Audit Checklist), including a time bound corrective action plan to be implemented at project level for addressing non-conformances.

Site HSE Representative will undertake monitoring of project implementation activities being undertaken by contractors as per the Internal Audit Checklist for EHS and Labor Aspects (**Appendix K**).

6.2 EHS Reporting: Disclosure and Communication

The template / outline of the EHS monitoring report is provided in **Appendix L**. In addition to the annual reports to be prepared for submission to Board, Lightstorm will ensure that notification on major

incidents, fatal accidents and unplanned events, shall be submitted to Lenders within 24 hours of occurrence (as applicable). Such reports will be prepared and submitted by the E&S Lead.

APPENDIX A
COMPENDIUM OF APPLICABLE E&S REGULATIONS

S. No.	Specific Regulation/Policy	Description	Pre-construction	Installation	Operation	Decommissioning	Enforcement Agency	Remarks	Site Level Applicability
1.	The Child Labor (Prohibition and Regulation) Amendment Bill, 2012	- The Act prohibits employment of children below 14 years in certain occupations such as automobile workshops, bidi-making, carpet weaving, handloom and power loom industry, mines and domestic work. In light of the Right of Children to Free and Compulsory Education Act, 2009, the Bill seeks to prohibit employment of children below 14 years in all occupations except where the child helps his family after school hours. - The Act adds a new category of persons called "adolescent". An adolescent means a person between 14 and 18 years of age. The Bill prohibits employment of adolescents in hazardous occupations as specified (mines, inflammable substance and hazardous processes). - The penalty for employing a child was increased to imprisonment between 6 months and two years (from 3 months-one year) or a fine of Rs 20,000 to Rs 50,000	X	√	√	√	Ministry of Labor Department	-	The Act prohibit the employment of children below 14 years in certain occupations, it is employer (Lightstorm)'s responsibility to ensure the same.

S. No.	Specific Regulation/Policy	Description	Pre-construction	Installation	Operation	Decommissioning	Enforcement Agency	Remarks	Site Level Applicability
		(from Rs 10,000-20,000) or both. The Act empowers the government to make periodic inspection of places at which employment of children and adolescents are prohibited.							
2.	Employees Provident Funds and Miscellaneous Act, 1952	The Act is a piece of social security enactment designed to provide for a scheme to make provisions for the future of industrial workers and their dependents in case of their retirement and in the event of their premature death.	X	√	√	√	Ministry of Labor Department	-	Under the Act, employer (Lightstorm) is responsible for the filing of monthly return in electronic form, submission of the particulars related employees joining or leaving the service and nomination form and submission of Aadhar card and other KYC related document of their employees who become the member of EPF Scheme

Other EHS and Social regulations as applicable during project deployment and operation phase will be tracked and complied with by Lightstorm on ongoing basis.

APPENDIX B CHECKLIST FOR SETTING UP NOC/ DATA CENTERS

BUILDING	
Total building height (ft)	
Stand alone/ Campus	
Type of building (Mixed/commercial/IT/SEZ/STPI)	
Age of the building	
No. of blocks in the campus	
No. of Entry/Exit points to the building	
Total floors in building (example: No of basements+G+no of floors)	
Total built-up area (Sqft) of the building	
Usage of basement (storage, parking only, service rooms)	
1.Floor height (ceiling to slab)	1.
2.Clear height (slab to bottom of beam)	2.
Are there specific areas strengthened for equipments like UPS,battery, RO plant etc. Please mention the location.	
Type of slab (PT/Flat/Deck slab)	
Is the building NBC compliant?	
Please mention the year of NBC code followed for the design	
Green energy certificate (Ratings- LEED,IGBC etc)	
Type of construction (Column+beam, coulumn+capital, prefab)	

EXTERNAL
External finish (masonry, glazing, ACP, Texture Paint)
Facade glass (Single/ double glazed)
Basement Ramp clearance height and width of the Ramp

FIRE STANDARDS
No. of fire exits per floor (staircases)
Fire rated doors for office space
High-side sprinklers
Low-side sprinklers
High- side FAPA
High-side smoke detectors (present, not-present, to be completed)
Basement fire protection system (please elaborate the provisions made)
BMS
Pressurization for staircases, lift lobbies, lift well
staircase railing (2 railings on either side + height of the railing is 1.1mts)
(available as per the NBC norms)
Location of fire pump, numbers, capacity and age of the fire pump

SECURITY
CCTV for interior common areas available? (Y/N)
CCTV for exterior common areas including basements available? (Y/N)
CCTV in the basement parking (Y/N)
Turnstiles in the entrance lobby (Y/N)
Physical security 24/7 (Y/N)
Boom barriers for the entry and exit of the building (Y/N)
Is there an existing management system for food deliveries and couriers? Please provide details

POWER + ELECTRICAL

Total sanctioned power for whole building (kVA)

Please provide floor level Power supply per 100 sft (kVA) for low side i.e, tenant office space (including lighting, UPS, rawpower, Low Side HVAC, RP and Pantry, IT Loads etc.)

Please provide floor level power supply per 100 sft (kVA) for high side (including chillers, pumps, utility loads, fire, PHE, lifts and all common area loads)

- Transformer capacity and nos.
- Transformer configuration (N,N+1,N+N)
- Transformer age

Are there dual and diverse sources of power supply to the building?

Is DG with 100% back up?

Details of the DG:

- DG capacity and nos.
- Location of DG
- Age Of the DG
- Enclosure to DG (Y/N)
- DG configuration (N, N+1, 2N)

HSD Yard (Y/N)

UPS availability (Y/N)? What systems are connected to the UPS?

Can additional feeders be provided to the tenants for usage? (Y/N, capacity)

Is there an existing VMS system for the building and/or campus? Please provide details

COMPLIANCE

CC (available, not available)

OC (available, not available)

Fire NOC (available, not available)

CEIG for lift, DG and electricity (available, not available)

Sanction drawings (available, not available)

Approved Fire drawings- authority signed off (available, not available)

Testing and commissioning reports of all the high side equipments and the low side equipments (available, not available)

HVAC

Typology (chiller/ VRV/ split)
 Type of chiller system (air cooled/water cooled)
 Details of the chillers (capacities/ make/model)
 Location of chiller
 Is cooling present in all common areas including lift lobbies? (Y/N)
 Location of AHU
 What is the AC total tonnage per floor (AHU or CSU)
 Please specify the number of AHU or CSU per floor and the capacities of each AHU or CSU
 Age of the equipment (AHU, chiller)
 Is the HVAC calculations and requirements follow ASHRE code?
 Basement ventilation setup- mechanically pressurised or naturally ventilated (please explain in detail)
 Are chillers in N or N+1 configuration?

DATA/ISP

Infrastructure for DATA system(cables, Hume pipes, communication shafts, communication room, race ways for cable)- (available, not available)
 Number of data entry lines
 Available service providers in the building (Airtel, Vodafone etc.)

 Are the entry lines geographically diverse? (Y/N)
 Cables used/ Cables available
 Availability of BMS for high side equipments (Y/N)
 Please mention the equipment's connected.
 Is there space provision for antennas? Please share location details

No. of communication shafts available.
No. of dedicated communication shafts for tenant

APPENDIX C SCOPE OF WORK FOR SITE IDENTIFICATION, ACQUISITION, ZONING/ CONVERSION AND POWER CONNECTION AT SITE

Task 1 – Site Identification

- a. Site identification
 - Identify potential sites (3–4 no.) that match Lightstorm's technical requirements and are no more than 2 km from the location (Lat/Long) shared by Lightstorm.
 - Lightstorm's site acquisition team to shortlist the potential sites within 2 weeks from the go ahead and share the complete details as specified in the Site survey format.
- b. Lightstorm's site acquisition team will provide confirmation from landlord to either (a) lease the site on long term or (b) outright sale of property with indicative cost to lease / buy
- c. Lightstorm's site acquisition team to provide land area calculation and landlord verification of boundary lines. The site survey template must be followed for the physical measurements and geographic coordinates of every corner.
- d. Lightstorm's site acquisition team shall give priority to the sites that have already been converted for commercial usage. In case land is non-commercial, Lightstorm's site acquisition team shall ensure the landlord willingness to convert the land to commercial category.
- e. In case of a large land parcel, Lightstorm's site acquisition team to assist in converting a portion of the land for commercial use acquired for the project. Parties to agree in writing, towards any additional cost and time required to sub divide the land and convert to commercial land usage.
- f. Lightstorm's site acquisition team shall submit the completed Survey Checklist which must be completed, and necessary land ownership documents including but not limited to:
 - i. Copy of the registered Sale Deed/Conveyance Deed/Gift Deed/ will/ any other documents to establish the ownership.
 - ii. Copy of the Revenue Records/Mutation Records issued by local revenue authority/department.
 - iii. Copy of the Village Form No. 6, 7, 12 and 8A for Agricultural Land issued by local revenue authority/department.
 - iv. Copy of the Encumbrance Certificate for the last 25 – 30 years issued by relevant sub-registrar office.
 - v. Aadhar/ PAN, Patta etc.)

The above-mentioned documents must be collected and submitted to the legal team to conduct due diligence within 2 days of survey completion – 20 days required to obtain latest documents from owner/revenue department.

- g. Lightstorm's site acquisition team shall provide Theodolite (IOS) Images or Dioptre (Android) and videos from all corners of the land.

- h. Lightstorm's site acquisition team shall conduct 2-3 site visits at all potential locations as needed.
- i. Lightstorm's site acquisition team shall provide power requirement and feasibility for the potential site from nearest (11KV) sources and cost estimate for the same.
- j. Subject to the relevant state policy, basic land ownership documents including encumbrance certificate for last 40 years (as long as possible)/ or a non-encumbrance certificate for the past period shall be procured by Lightstorm's site acquisition team.

Task 2 – Site Acquisition - Land Finalization, Legal Diligence, and Lease deed Registration

- a. Legal Diligence, (within 2 weeks of site confirmation)
- b. Collection of all relevant ownership document from landlord/requisite government authorities including any encumbrance certificate.
- c. Verification of ownership documents from relevant government authorities including Local Revenue Authorities, Sub Registrar Office etc. –the Govt. Authority name to be specified, legal opinion (maybe obtained) from advocate. (Registrar Office etc)
- d. Due diligence of the property (land title, ownership, Lien, Boundary survey, non-encumbrance certificate etc.).
- e. Land Conversion for Telecom/Commercial usage (if required).
- f. Approved Boundary Survey report by government authorities. within– 90-to-120-days. (e.g Field Measurement book report of the Identified survey no. either from the local authority or online portal), this required within 1 week from survey date.
- g. Commercial finalization with the landlord for long term lease or buy-out to be done in concurrence with Lightstorm.

Site Acquisition – (within two weeks post Customer's confirmation).

- a. Site lease/purchase Agreement registration,
- b. Supporting in negotiation and getting concurrence from Landlord for the standard Lightstorm lease agreement draft –clause changes request by owner,
- c. Coordination with a local law firm for the following:
 - i. Stamp Duty charges estimation –
 - ii. Purchase Non-Judicial stamp paper, pay authorized government other services challans
 - iii. Booking slot for legal registration with Sub Registrar Office.
 - iv. Supporting in executing the lease deed at Registrar office.

Task 3- Land Conversion, Zoning and Building Permissions/NOC

- a. Assisting in zoning of land and NOC from the respective local departments as required with the Land Owner.
- b. Assist in estimation of cost for land conversion cost estimation, suitable with proposed usage
- c. Assist in document collation necessary for submission applications.
- d. follow-up for necessary documents (as mentioned below or as per the local/state requirements) to obtain approvals from necessary government authorities and to completing the land category conversion as required.
- i. Fire Department NOC (If required)
- ii. Municipal/Government authority map update & NOC (If required)
- iii. NOC for Building Construction subject to MC/TP registered architect plan provided by Lightstorm
- iv. Any other relevant NOC for Construction (If required)
- v. Pollution control board (PCB) NOC for DG – As per state policy

Task 4- Power Supply at Site post site acquisition

- a) Assess the HT power supply (11KV) survey from nearest point, distance, capacity availability, line extension as per the applicable load requirement.
- b) Prepare and submit the application for power supply connection by Lightstorm.
- c) Assess the cost estimation for power connection to be obtained from SEB department.
- d) Assist in securing EB power connection and meter installation at the site.
- e) Assist in preparation of BoQ for low side till EB Panel. Based on the load requirement.
- f) Preparation of documents require to obtaining NOC from local body for EB. (As per state policy).

In case of putting A DG Set at Sites following permits will be required:

1. ****Environmental Clearance****: Obtained from the State Pollution Control Board (SPCB) to ensure that the generator's emissions are within permissible limits.
 - For small generators (up to 5 kVA), this might not be required.
 - For larger generators, especially those above 15 kVA, a Consent to Establish (CTE) and Consent to Operate (CTO) from the SPCB are necessary.
2. ****Electrical Inspectorate Approval****: Approval from the Electrical Inspectorate is required to ensure that the installation complies with electrical safety standards.
3. ****Municipal Corporation Approval****: Local municipal bodies often have regulations regarding the installation and operation of generators, particularly

concerning noise pollution and installation safety.

4. ****Fire Safety Clearance****: Depending on the size and location of the generator, a fire safety clearance from the local fire department may be necessary.

5. ****Building Permit****: If the generator installation involves structural changes to a building, a building permit from the local municipal corporation may be required.

6. ****Fuel Storage License****: If the generator uses diesel or other fuels, you may need a license for fuel storage from the Petroleum and Explosives Safety Organization (PESO).

7. ****Noise Pollution Compliance****: Generators must comply with noise pollution standards set by the Central Pollution Control Board (CPCB). You may need to ensure that your generator meets these standards and obtain a certificate of compliance.

APPENDIX D SOP ON DEPLOYMENT PHASE OCCUPATIONAL HEALTH AND SAFETY

Definition

Statutory permissions– various statutory /regulatory permissions like from state and private authorities like the Municipal Corporation, National Highway, Electrical / Gas supply corporations etc.

Traffic control – measures to warn on-coming traffic about the work activity in progress like posting warning cones, putting warning tape, barricades, posting a signal man, etc.

Standards

1.1 Design and before commencing work

- 1.1.1. All OSP work activities must be planned with considerations on safe access, execution and the type of activity to be performed. The planning must consider:
 - a. Alignment with the Health and Safety Plan of LDC as below:
 - b. Inclusion of site-specific risk assessments
 - c. Avoidance of buried services where possible
 - d. Avoidance of entry into confined space where possible
 - e. Types of cable laying methods available.
- 1.1.2. OSP work must be controlled by following a permit to work (PTW) process ensuring risk assessment before commencement of activity which also ensures that all required tools, equipment & resources required for the task are in place. Risk assessment process must consider aspects for example underground utility lines, presence of flammable materials or substances in line with trenching area, pedestrian / road traffic, structural collapse, flooding, confined space, etc. for underground work and proximity to overhead electrical cables, working at height, pedestrian / road traffic, etc. for OSP work.
- 1.1.3. Additional / specific risks including but not limited to snake / animal bite, falling of tree / branches / other fixed structure, leakage in toxic / flammable gas pipes, electrocution, drowning, asphyxiation, stale substances, must be considered and mitigated appropriately.
- 1.1.4. Where excavation is required near to possible buried services (e.g. electricity/optical fibre cables, natural gas and LPG pipelines, water pipes, sewers, petrochemical pipelines, communication lines, etc.), sufficient time and resource must be provided to ensure the excavation is carried out

safely. There are 4 basic elements to the safe system of work that should be employed when working on or near buried services:

- a. Contact utility operators for plans of buried services
- b. Survey the intended route
- c. Detect, identify and mark underground services
- d. Employ safe excavation/safe digging practices

- 1.1.5. All selected equipment and tools must be fit for use and safe to ensure that improper selection of the tool itself doesn't pose any hazard to an individual or equipment. Mechanical excavators if used, must be fit for the purpose, suitable to the type of soil and must be operated by a licensed operator.
- 1.1.6. Traffic control measures like hard barricading, cordoning off, warning signs, signal man, etc. as appropriate must be in place before commencement of job to prevent any stoppage of work, danger to people and also to restrict unauthorized access. The barricading / warning signage must be such that they are visible at day and night.
- 1.1.7. All team members including supervisor, patroller, general labor, machine operator (splicer, horizontal directional drilling operator, JCB Operator), Fault Restoration Team (FRT) vehicle driver, etc. must be physically fit, experienced and trained as per Table 1 in Annexure below.

1.2 During work

- 1.2.1. All OSP work activities must be supervised during the course of work.
- 1.2.2. During laying / maintenance of OFC cable as may be applicable, safe system of work must be followed for cable drum handling, cable pulling, laser safety, cable splicing etc.
- 1.2.3. OSP work activities must be restricted during adverse weather and during hours of darkness. If it is not possible to reschedule the work, an approval must be taken from a designated LDC employee. The working location must be sufficiently illuminated. Hard barricades e.g. modular type, signage and lighting must be provided if the excavated area is to be left open during the hours of darkness.
- 1.2.4. All personnel must use LDC approved standard Personal Protective Equipment (PPE) complying to European (EN) standard or equivalent relevant Indian Standard (IS) as per the work undertaken
 - a. High visibility clothing / Reflective wear
 - b. Safety footwear - EN 345
 - c. Hard hat - EN 397
 - d. Eye protection as necessary – EN 166
 - e. Gloves – EN 420
 - f. Hearing protection (EN 352) and anti-vibration gloves (EN 388) must be used by persons using horizontal directional drilling machines / pneumatic ground breakers.

- 1.2.5. In case the excavation is undertaken exclusively for LDC. purpose, then adequate support systems, such as shoring / bracing / underpinning, etc., must be ensured to prevent collapse of excavated earth and to ensure that adjacent structures remain stable. Excavated earth must be placed adequately away from the place of work to prevent collapse.
- 1.2.6. First aid box must be available with the team.
- 1.2.7. Patrollers monitoring other excavation works to prevent cuts / damage to cables / equipment, must be aware of the risks associated in terms of heavy vehicles traffic, excavated areas, etc. and stay clear from the hazards.
- 1.2.8. Journey management / work at height / electrical work involved while undertaking OSP work / underground work must be in accordance with the requirements of relevant LDC specifications
- 1.2.9. Violation / deviation of any requirement of this standard needs to be reported as per the incident management process and actions taken as per applicable matrix.
- 1.2.10. Additional guidance shall be provided as maybe applicable in case required for implementation of this Standard will be provided by LDC Corporate HSW on case-to-case basis.

Table 1: Competency check - Following criteria should be followed on eligibility, qualification & experience

Role	Experience	Age criteria (years)	Qualification / Eligibility	Training to be imparted by the Contractor / Vendor
Site Engineers/ Supervisor	Experience in management of Site Construction & monitoring of vendor personnel	Min. 21 & above	Graduate /Diploma/ITI	Induction Training on Basic Safety including Expect the Unexpected (ETU), Risk assessment process, emergency preparedness, First-Aid, Absolute Safety Rules (ASRs), Basic Negotiation Skills

APPENDIX E- OCCUPATIONAL HEALTH AND SAFETY PLAN

The following plan lists down the specific protocols and measures that have been instituted to secure the optimum health and well-being of all the employees at workplace.

BRIEF AND PURPOSE: -

Our health and safety plan aims to retain and ensure the best possible working conditions for its employees. This involves identifying and controlling the potential hazards and health related issues, providing adequate equipment, and establishing protocols for responding to emergencies and accident in the best interest of our employees. Our company is committed to create a health-oriented and hazard-free workplace.

APPLICABILITY AND SCOPE: -

This Health and Safety Plan applies to all the present and prospective employees of the organisation. It is a comprehensive strategy that aims to promote a safe working environment and prevent many types of accidents and mishaps.

IDENTIFYING THE RISKS AND HAZARDS: -

Some of the common risk and hazard includes but are not limited to: -

1. **Physical Hazards:** - These cover accidents and incidents such as slips, falls, trips, cuts, burns while working in the office premises.
2. **Ergonomic Hazards:** - "It encompasses a range of risks that are related to the design of workstation, tools and equipment's and how they impact the health and well-being of the employees."
Some common ergonomic risk factors that can lead to serious health issues and discomfort include problems pertaining to the lack of movement, poor posture, back strain, excessive force, forceful exertions, and injuries resulting from repetitive motion.
3. **Environmental Risks:** - The environmental hazards pertain to the complications arising from inadequate air quality, erratic temperature, and disruptive noise vibrations.
4. **Sanitation Risks:** - The prevalence of COVID-19 coupled with unsanitary conditions and insufficient sanitary measure, presents a significant health hazard to employees and increases the likelihood of them contacting infections.
5. **Fire Risks:** - Fire hazards can emerge from inadequate storage of inflammable substances, defective wiring, and other factors, potentially leading to extensive property damage, bodily harm, and even fatalities.
6. **Biological Risks:** - Workers are suspected to plethora of biological perils such ranging from viruses and bacterial to fungi and other contagious agents, all of which can result into illness or ailment.

PREVENTIVE ACTIONS: -

We implement the subsequent precautionary action to avert and mitigate potential dangers and untoward incidents: -

1. Employing a workspace that is pristine and well-structured and incorporating ergonomically designed furnishings which includes adjustable chairs to maintain good posture and to reduce the risk of injury.
2. Providing a thorough fire evacuation plan in order to protect our employees from hazardous events and accidents.
3. Utilization of facial masks, sanitizers, and organizing COVID-19 screenings has been implemented to ensure the safety and welfare of all personnel, as well as to mitigate the transmission of the COVID-19 pathogen.
4. Emphasis on promoting good hygiene practices and encourages social distancing. We further recommend refraining yourself from attending the office physically if you manifest and experience any symptoms related to COVID-19 to prevent any potential transmission.
5. Encouraging adoption of proper storage and implementation of the effective waste-management practices.
6. We encourage regular breaks and movements which can help to prevent fatigue and discomfort with associated prolonged sitting thereby, improving circulation and energy levels.
7. Striving to enhance the indoor air quality at our office. In addition, we prohibit smoking in office premises.
8. To maintain a safe and hygienic environment, our organization places great emphasis on regular cleaning and disinfection of our premises and promote application of proper hygiene practices.

INCIDENT REPORTING: -

Employee / worker witnesses or is involved in an incident – the employee must complete Incident/Accident Reporting Form (format provided below). A central Email ID-Incident.Management@Lightstorm.in is implemented with relevant persons having access as below:

1. **Manmeet Singh** (Sr. Manager-Admin)-GURGAON
2. **Ankita Dubey** (Deputy Manager-Admin) - GURGAON
3. **Mahesh Sawant** (VP-SEG & NOC) - NOIDA
4. **Atul Bhandarkar** (Global Chief Information Officer) - MUMBAI
5. **Sayan Bhattacharya** (GM – Network Projects) - KOLKATA
6. **Sayali Phatak**- General Counsel & Chief Compliance Officer
7. **Natasha Dhingra**- DGM Legal & Compliance

Hazard will be recorded in the format below and the notification will be immediately emailed to the above email id.

- Low and Medium risk incidents (involving no injury) shall be controlled by the site personnel.
- Management in consultation with employees (eyewitness, supervisor) will ensure immediate interim action is taken as required to minimize risk within the workplace including providing first aid.

Format for Incident Reporting and Recording

Location:	Date :
Reported by:	
Department:	
☐ Operations ☐ Technical maintenance ☐ HR ☐ Security ☐ Legal	

☐ Administration ☐ Contractors			
Type of Incident			
☐ Fatality	☐ Injury/ illness	☐ Vehicle Incident	☐ Property Damage
☐ Environmental Spill/ Release ☐ Hazardous situation / dangerous good ☐ Regulatory Inspection or Notification: ☐ Other (describe)			

In case of accidents,

Date of Accident	Time of the accident	Name of the Person	Employee No	Injury	First Aid Provided

Description of Incident : (please provide information on injury types, property damage, quantity of material release, type of violation, etc.) :

Describe main cause of the incident:

Immediate Actions Taken:

Suggest preventive Actions to be taken in Future

Signature of Site HSE
Representative:

Following is the emergency identified in Lightstorm office(s). Preventive measures and mitigations have been provided below:

S. No.	Possible Emergency	Location/Activities	Preventive Measure	Mitigation
1.	Fire resulting from electrical short circuit	Office	Preventive maintenance of the electrical equipment, tightening check time to time with a fix schedule	Suitable Fire Extinguisher, First aid box available to mitigate any fire or incident cause

Lightstorm has developed a **Business Continuity and Disaster Recovery Plan, dated 1st March 2021, (updated version 19th October 2024)**. The purpose of Business Continuity and Disaster Recovery Plan (“BCP” or “Plan”) is to ensure that Lightstorm has a robust operations plan and can restart extremely important business operations even after a major disruption happens. DR/BCP Drill and awareness sessions will be conducted from time to time so that the entire Organisation and the various functions are equipped with the plan.

A Core Crisis Management Team (“CCMT”) has been formulated as part of the Plan. The CCMT must be available to respond and react as a team in emergency or crisis situations. The CCMT will be required to meet annually to review the plan and update information. The BCP provides details on the roles and responsibility of the CCMT members. Details of emergency response procedures are also part of the BCP.

In order to ensure quick response to emergency situations, Lightstorm team will identify and share the following details with project team of contractors and office staff (as applicable):

- Location specific Emergency contact numbers for nearest fire stations and hospitals, for:
 - Nearest to Lightstorm office buildings – corporate office and site offices,
 - Covering every 50 km of a network route

- Contact details of Project Head and Site HSE representative
- Any other government authority as relevant

For office locations, Lightstorm will maintain list of firefighting equipment as per below format:

LIST OF FIREFIGHTING EQUIPMENT IN GURGAON OFFICE

S. No	Location	Type	Capacity	Last inspection date
1.	PANTRY	POWDER	2 KG	□
2.	OUTSIDE PANTRY	POWDER	2 KG	□
3.	OUTSIDE SERVER ROOM	POWDER	2 KG	□

LIST OF FIREFIGHTING EQUIPMENT IN NOIDA OFFICE

S. No	Location	Type	Capacity	Last inspection date
1.	4 IN 4 CORNER AND 2 IN CENTER BOTH SIDE	CO2	6.5 KG EACH	□
2.	UPS ROOM	CO2	6.5 KG	□
3.	BATTERY ROOM	CO2	6.5 KG	□
4.	NEAR BY UPS ROOM MAIN DOOR, FIRE SUPPRESSION AREA	CO2	6.5 KG	□
5.	PANTRY	CO2	6.5 KG	□
6.	VIP PANTRY AREA	MULTIPURPOSE DRY POWDER	6 KG	□

LIST OF FIREFIGHTING EQUIPMENT IN KOLKATA OFFICE

S. No	Location	Type	Capacity	Last inspection date
1.	DATA CENTER (3)	CO2		□
2.	RECEPTION AREA	CO2		□
3.	BATTERY ROOM	CO2		□
4.	PANEL ROOM	CO2		□
5.	WORKSTATION/CONFERENCE ROOM	CO2		□
6.	STORE ROOM	CO2		□

LIST OF FIREFIGHTING EQUIPMENT IN MUMBAI OFFICE

S. No	Location	Type	Capacity	Last inspection date
1.	FIRE ALARM - RECEPTION AREA	N/A	N/A	□
2.	SPRINKLERS - WORKSTATION AREA/7 CABINS/ NETWORK OPERATION CENTER	N/A	N/A	□
3.	HOUTER - RECEPTION, NORTH WORKSTATION, SOUTH WORKSTATION & NETWORK OPERATION CENTER	N/A	N/A	□

Lightstorm will also identify and list safe assembly areas for emergency situations at office locations.

LIST OF ASSEMBLY POINTS IN GURGAON OFFICE (For Offices Only)

S. No	Assembly point number	Location of assembly point
1.	GARDEN, GROUND FLOOR	IN THE BUILDING
2.	BASEMENT – 3	IN THE BUILDING

LIST OF ASSEMBLY POINTS IN NOIDA OFFICE (For Offices Only)

S. No	Assembly point number	Location of assembly point
1.	BASEMENT – 2	IN THE BUILDING

LIST OF ASSEMBLY POINTS IN KOLKATA OFFICE (For Offices Only)

S. No	Assembly point number	Location of assembly point
1.	GROUND FLOOR	IN THE BUILDING

LIST OF ASSEMBLY POINTS IN MUMBAI OFFICE (For Offices Only)

S. No	Assembly point number	Location of assembly point
1.	7th FLOOR, MEZZAINE FLOOR, FRONT SIDE AND BACK SIDE	IN THE BUILDING

All mock drills conducted as part of the BCP shall be recorded in the following formats by the Admin & HR Team. Site HSE Representative will fill the format for any mock drills conducted at deployment sites and hand over to the Admin & HR Team for records:

MOCK DRILL FORMAT

Mock Drill No.					
Date:					
Event:					
Emergency declared at (time):					
In-charge of Mock Drill:					
Name of Controller:					
Name of Observer:					
Drill attended by :					
Sl. No.	Time	Message from	Message	Action taken	Remarks
No. of mock casualties (if any) :					
No. of Fire Extinguisher used (Description):					
Observations:					
Controller:				Observer:	
Shortcomings:					

Members present:	
Corrective Action suggested:	
Designated Safety Personnel	Authorized Signatory

APPENDIX F SOP ON ELECTRICAL SAFETY DURING OPERATIONS

- A safety warning and tagging system shall be used to ensure that all power is removed from the system. (See the Lock-out/Tag out section for more information). Circuits shall be checked by the Authorized personnel with the proper equipment before work is started to ensure that no voltage is present. Testing equipment shall be calibrated.
- Electrical accidents can cause burns, shocks and electrocution, and without the proper electrical safety can lead to fatal accidents in a worst-case scenario.



Precautions during Electrical Work

1. Use per Listing and Labeling
2. Inner wires exposed – **Don't use.**
3. Plug not fully seated – **Don't use.**
4. Cords run through doors / punch points – **Don't use.**
5. Outer sheath damaged – **Don't use.**
6. Cord tightly coiled may cause a problem – **Don't use.**
7. Tightly coiled cord that had a meltdown because it couldn't cool properly when overloaded.
8. Cords must be GFCI protected or under an Assured Equipment Ground Conductor program.

**Lock-out /Tag-out is
necessary for blocking
the flow from power
resource**



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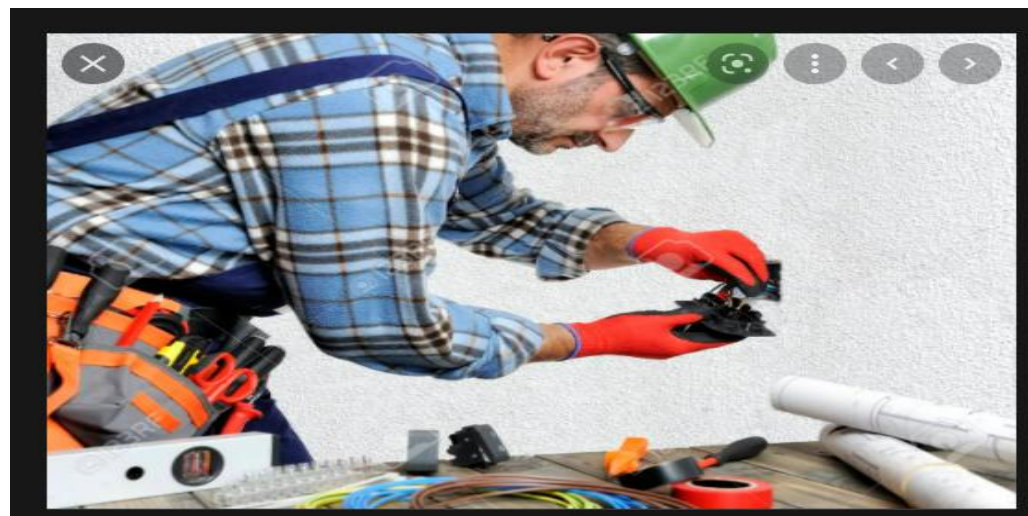
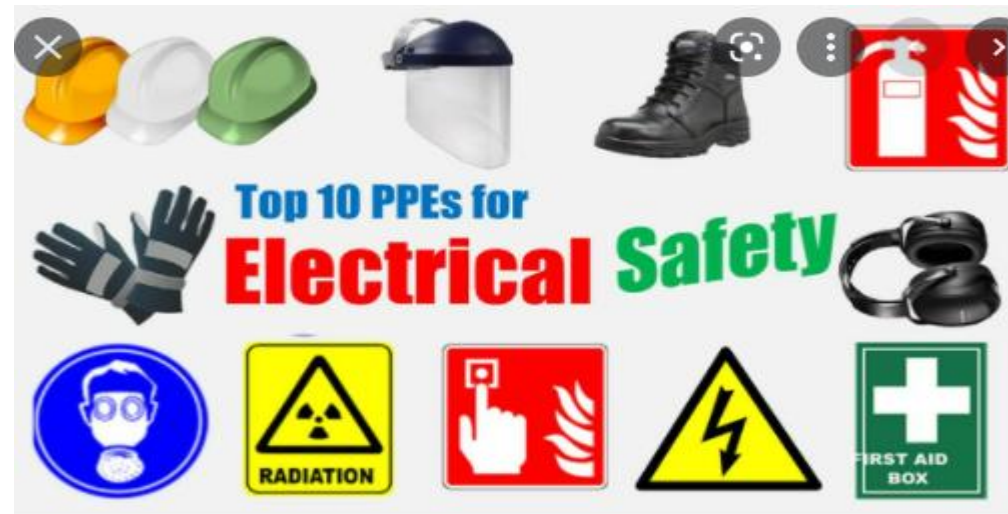
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SAFETY PPE





HSEF Process:

Mandatory PPE during Work:

1. Safety Shoes
2. Helmet
3. Gloves
4. Safety Jacket
5. Google

General Safety Guideline:

- User Proper PPE while working at Site.
- If Possible, disconnect the electrical supply.
- Assess situation-never put yourself on risk.
- Apply the First aid Principles.
- Don't wear Ring or Bracelet while working on electrical equipment.
- Take Work Permit from the appropriate municipal/regulatory body before starting of work.
- Use Insulated Tools.
- USE LOTO while working.
- Use proper Hand gloves while working
- Always use Certified Tools and Tackles.
- Always Keep Suitable Fire Extinguisher near the work activity.
- Remove all Combustible Material
- Observe Abnormal heating of the Panel/Cable/MCB

- All Incoming and Outgoing Cable Properly Marked
- Check Condition of MCCB and ELCB.
- Maintenance to be Carried out by Trained Professional only.
- Replace Fuse with Similar rating
- Never Add or Remove Battery in the Bank when connected to SMPS (Charger)
- All Temporary connection through proper MCB.
- The Area should be properly illuminated.

Safety while Excavation:



Other hazards include:

- Moving machinery near the edge of the excavation (can cause a collapse)
- Contact with or cutting underground utility lines
- Vibrations
- Being hit by machinery or vehicles
- Fire

APPENDIX G HUMAN RESOURCES MANAGEMENT FRAMEWORK

The purpose of this framework is to promote fair treatment, non-discrimination and equal opportunity of employees engaged with Lightstorm. In addition, this procedure will help to establish, maintain and improve the worker-management relationship. This shall be applicable to all direct/ on-roll employees of Lightstorm.

This Framework shall form the guiding principles for formulation of a detailed HR Policy Manual or updation of existing HR Policy / procedures by Lightstorm.

Guidelines

- The HR Policy shall cover general terms and conditions of services including appointment procedure, probation period, confirmation of service, promotion, retirement, employee's code of conduct other financial benefits, transfer and change of designation, job categorization, leave policy, bonus policy, office timings, non-employment of adolescent & child at work, anti-discrimination policy, anti-harassment and abuse at work policy, performance appraisal policy, anti-bribery & corruption policy, whistle blower policy.
- Lightstorm shall refer to the following structure for HR Manual/ Handbook. The same shall be approved by the senior management and extended to all direct employees/workers:

1. HR Policy

1.1. Policy statement

1.2. Policy objectives / goals

2. Other HR Policy statements and commitments

2.1. Policy against and abolition of forced labor / child labor

2.2. Policy against discrimination and harassment at work place

2.3. Anti-bribery & corruption policy

2.4. Whistle blower policy

2.5. Security and safety policy for working staff

3. HR planning and management

3.1. Resource requirement

3.2. Man power requirements

3.2.1.Manpower needs and requisition

3.2.2.Recruitment sources

3.2.3.External sources

3.2.4.Vacancies advertisements

3.2.5.Other modes of recruitment

3.3. General recruitment policies

3.3.1.Application process

3.3.2.Selection

3.3.3.Shortlisting of candidates

3.3.4.Roles of different departments for shortlisting candidates

3.4. Appointment

3.4.1.Placement

3.4.2.Role confirmation

3.5. Induction process

3.5.1.Training need assessment

3.5.2.Training plan for the candidate

3.5.3.Types of training including orientation, in-house training, job specific training etc.

3.5.4.Instructors roles and responsibilities

3.5.5.Trainees roles and responsibilities

3.5.6.Training budget

3.6. Performance evaluation and incentives

3.6.1.Performance evaluation

3.6.2.Promotion

3.6.3.Increments
3.6.4.Service records
3.7. Pay and Benefits
3.7.1.Basic salary
3.7.2.House rent, conveyance, medical allowances (as may be applicable in line with legal requirements)
3.7.3.Performance bonus
3.7.4.Leave entitlement
3.7.5.Provident fund
3.7.6.Gratuity
3.7.7.Death and disability benefits (as may be applicable)
3.8. Medical policy and entitlements
3.9. Work schedule
3.9.1.Work timings
3.9.2.Working in shifts and schedule
3.9.3.Leaves, Holidays and entitlements (earned leave, sick leave, casual leave, maternity leave, leave without pay, etc.)
3.10. Disciplinary measures and grievance procedures
3.10.1. Principles of disciplinary code
3.10.2. Suspension from work
3.10.3. Notification of charges and response
3.10.4. Corporate and managerial conduct
3.10.5. Confidentiality and breach of trust
3.10.6. Grievance addressal
3.10.7. Disciplinary actions and procedures
3.10.8. Enquiry process

3.11. Separation from service

3.11.1. Resignation

3.11.2. Retirement

3.11.3. Termination /

3.11.4. Discharge for other reasons

3.11.5. Exit interview procedures

3.11.6. Unsatisfactory performance / dismissal etc.

3.11.7. Notice period requirements

3.12. Other HR Policy statements and commitments

3.12.1. Policy against discrimination at workplace

- Lightstorm shall employ individuals on the principle of equal opportunity and fair treatment and shall not discriminate against any individuals on grounds of gender, race, nationality, ethnicity, social and indigenous origin, religion or belief, disability, age or sexual orientation. An Anti-Discrimination Policy shall be developed to this effect. It shall be in compliance with Equal Remuneration Act, 1976.
- A POSH Policy shall be developed stating the company's commitment to provide a work environment, which promotes equal opportunities and prohibits discriminatory practices. The types of harassment shall be described, and the procedure of complaint shall be established. This shall be in compliance with provisions under the Protection of Women from Sexual Harassment (POSH) Act, 2013.
- The HR Policy shall demonstrate its commitment in practicing prohibition of engaging child labor and forced labor in all its work. This includes any kind of involuntary or compulsory labor, such as bonded labor, or similar labor- contracting arrangements. This shall be in compliance with Child and Adolescence Labor (Regulation and Abolition) Act 1986, as amended in 2016; and amended till date, and the Bonded Labor System (Abolition) Act, 1976, amended till date. This policy shall be extended to the third party workers (engaged by contractors) as well. All contract agreements made between Lightstorm and Contractors shall carry the clause on prohibition of child labor and bonded/forced labor.
- The HR Policy shall cover procedures such as the manpower planning, raising recruitment requisition, deciding on job roles, recruitment sources, application receiving, screening of process, short listing, test and interview, reference check and issuance of Offer Letter.
- The HR Policy shall cover provisions related to the employment contracts, working hours and leave, wages and termination in line with all applicable labor regulations, as stipulated in **Appendix A**.
- All employees shall be covered under group insurance coverage on the basis of their eligibility. For certain group of employees, depending upon eligibility, this shall also be in compliance with applicable provisions of Workmen's Compensation Act, 1923; and amended till date.

- On Transfer of Employees, Pay and Allowances, Seniority and Promotion, Remuneration and Benefits Package, Lightstorm shall not discriminate against any employees on grounds of gender, race, nationality, ethnicity, social and indigenous origin, religion or belief, disability, age or sexual orientation.
- Lightstorm shall develop an internal grievance mechanism for employees and workers to raise workplace concerns. The Company is to inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them. The procedures for the same have been outlined in SOP on Grievance Redressal Mechanism.
- Lightstorm shall provide all its employees with documented information (in writing) that is clear and understandable regarding their rights under national labor laws
- The HR Policy and Manual shall be reviewed on ongoing basis and shall be updated whenever changes in the Labor Laws are enforced.
- Lightstorm will monitor the compliance to labor laws by the contractors during project activities by using the Internal Audit Checklist for EHS and Labor Aspects (**Appendix K**). Any non-compliances will be flagged to the contractors and corrective actions will be sought.

Responsibility

HR Head will be responsible for implementation of this procedure in all employee related aspects. He / she shall ensure that the broad contours of this document is communicated and implemented for the benefit of the employees.

Records

- a) All employee records in accordance with the requirements of Indian Labor Laws.
- b) Updated HR Handbook.

APPENDIX H SOP ON GRIEVANCE REDRESSAL MECHANISM

With respect to managing grievances related to environmental and social performance, this procedure describes the types of grievances, grievance redressal process and mechanism (informal and formal channels) for handling grievances arising from the various stakeholders of the asset.

This GRM shall serve as one of the components of the ESMS for managing social performance of projects as well as providing more accountability to its stakeholders.

The Grievance Cell shall comprise of the following members.

1. Compliance Officer
2. Head HR
3. COO
4. And any other member of management

The complainant may submit a written complaint to any member of the Committee, or send an email to grievance@lightstorm.in.

In addition to the above, grievances can also be reported anonymously through a dedicated whistle-blower hotline service established to ensure confidentiality and encourage open reporting. This service provides an alternative means for employees and external stakeholders to raise concerns related to ethical conduct, workplace behavior, or environmental and social issues without disclosing their identity. **Anonymous complaints may be submitted through the following channels:**

- Toll-free Number: 1800 210 0139
- Email: lightstorm@tip-offs.in
- Web portal/Chatbot: www.lightstorm.tip-offs.in

Upon receipt of the grievance report, the grievance will be taken on record and an acknowledgment will be issued to the employee.

Preliminary Review - The Grievance Cell will conduct a preliminary review to determine if the grievance is within the scope of the ESMS policy. If the grievance is not within the scope, the employee will receive a written reply explaining the reasons. Additionally, the reply will include information on alternative modes of resolution.

Categorization and Forwarding - If the grievance is within the scope of the ESMS policy, the Grievance Cell will categorize it based on the nature of the complaint (e.g., safety procedures, equipment concerns, training issues). The categorized grievance will be forwarded to the concerned department within 15 days from the date of receiving the complaint.

Investigation and Resolution - The concerned department will initiate an investigation into the grievance and take necessary actions to address the issues raised. The department will provide a written resolution to the Grievance Cell within 30 days along with details of the actions taken or proposed.

The committee will strive to complete the investigation within 90 days from the date of receipt of complaint.

Communication to Employee - The Grievance Cell will communicate the resolution to the employee in writing. If the resolution is not satisfactory, the employee may appeal to a higher authority within the organization.

Anonymous Grievance Redressal Mechanism

If any internal or external stakeholder believes that Lightstorm's activities are having an impact on their quality of life, livelihood or environment, safety which they want the project team/management to address, such a concern can be classified as a complaint or grievances. From the purpose of classifying the various kinds of grievances that can arise, they are mostly categorized under following headings:

- Internal Grievances
 - Employee Grievance (Separate procedure should be developed as part of the Human Resources Manual based on this Procedure). These include the employees and workers hired specifically for the site.
- External Grievances
 - Contractor and labor related grievances;
 - Community grievances on project development and operations;
 - Community grievances on any community development or welfare activities and related issues;

Internal Grievances- Employees Grievance Part of HRMS

The likely grievances of direct employees of Lightstorm may include but not limited to:

- Complaints pertaining to the amount of wage, salary, other remuneration or benefits;
- Timely disbursement of remuneration;
- Working conditions, health and safety of the employees;
- Unethical behavior between senior and subordinate employees;
- Discrimination on the basis of caste, creed, language, religion etc.;
- Gender discrimination; and
- Workplace harassment.

This should be addressed as part of the Human Resources policies and procedures.

External Grievances

External grievances are those grievances received from the external stakeholders such as labor and workforce, contractors.

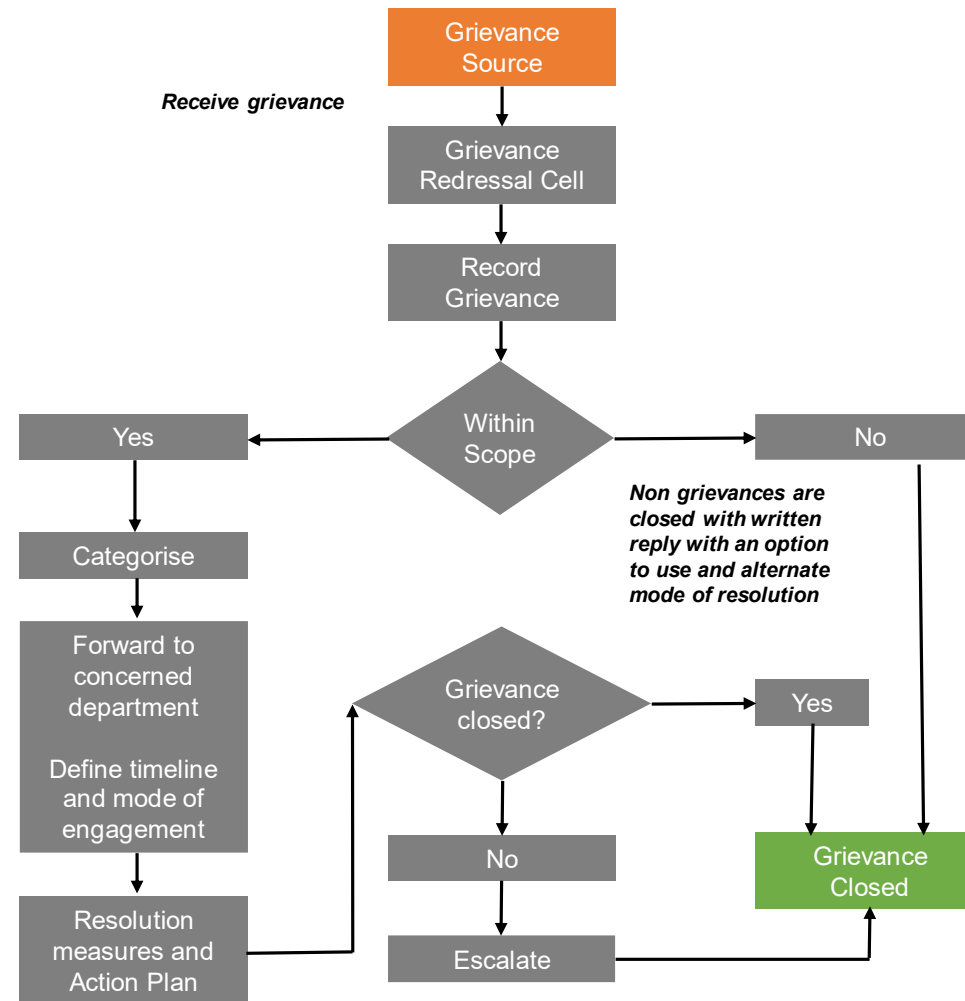
Exceptions

The external grievance redressal mechanism shall not apply to personal grievances, employment or service-related matters such as salary, promotions, performance evaluations, or disciplinary actions, anonymous, frivolous, or repetitive complaints without new evidence.

Redressal Process

The key provisions of the redressal process has been illustrated in below flowchart and explained in detail in following sections.

Figure 1: GRM Process Flowchart (applicable to internal and external grievances)



As part of its Human Resources system, Lightstorm shall develop a grievance redressal policy that covers registration and redressal of internal grievances raised by the employees and workers. The grievance policy is intended as the tool by which a member of staff may formally have a grievance, regarding any condition of their employment, which he/ she wants to be heard by the management of the Company.

APPENDIX I SOP ON CONTRACTOR MANGAGEMENT

SOP on Contractor and Supplier Selection and Management

Lightstorm engages with contractors for a diverse range of services including but not limited to procurement of components related to electricals, installation of optical fibers, civil works, routine and major maintenance, housekeeping at office spaces, security, transportation of materials, manpower supply, etc.

For this, Lightstorm will adopt the following processes:

- apply contractor/ supplier selection criteria (as provided in below sub-section),
- meet specific and generic contractual requirements on EHS compliance management,
- formulate and execute management measures around
 - construction health and safety,
 - pollution prevention,
 - emergency response, and
- implement EHS criterion for their performance evaluation.

The responsibility of implementation of this procedure lies with the Projects/ Operations and SCM Team.

EHS should be one of the criteria for Contractor and Supplier Selection, and Evaluation:

Engagement of the Contractor/ Supplier

- The selection of the contractors/ suppliers will be undertaken by the SCM team of Lightstorm. Post approval of the selected contractor/ supplier, it will be the responsibility of the Project team to formally engage the contractor/ supplier.
- While SCM team will be primarily responsible to formulate and finalize the work order, the Finance team may be engaged at this stage to oversee the finalization of the financial aspects of the contract.
- A copy of all the pertinent licenses and other documents (such as insurance policy copies) may be checked from the contractor / supplier by the Product/Planning Team
- In case of large and reputed contractors, they may also be required to submit further information on their HSE Policy and Management Systems, determined by the type of work that they will be performing on site.
- Lightstorm will attach their ESMS Policy and relevant EHS requirements as per the ESMS along with the contract.
- It will also be ensured that suitable EHS representatives are identified by the contractors who are aware of all EHS requirements and will be deputed onsite.

Execution of Contract

- The formal contract between the Lightstorm and contractor/ supplier will outline the terms of engagement along with the following provisions (at a minimum):
 - Compliance to statutory and good practice requirements pertaining to labor wages, attendance, working hours, overtime, etc.;
 - Compliance to the EHS requirements;
 - Prohibition on engagement of child labor, forced labor and bonded labor;
 - Prevention of sexual harassment;
 - Ensuring provisioning of adequate PPEs, first aid, medicines; and
 - Maintenance of records onsite as per statutory requirements.
 - Implementation of employee/worker grievance management system, and maintenance of relevant grievance records
- Lightstorm will append the Code of Conduct (Annexure 1 of this SOP) to the contract agreements that will be agreed with the Contractor.

EHS Induction and ESMS Induction Training

- An induction training on ESMS requirements will be provided to the contractor and all the contract workers prior to initiation of work. This training will need to be provided by the E&S Lead and the Site HSE representative who are well versed with the ESMS. The intent of this training will be to familiarize the contractor and workers of the requirements of the ESMS and their responsibilities thereunder.
- Additionally, as part of the induction training, the HR personnel / third parties (as appointed by Lightstorm) will be required to provide training on the HR policy and procedures (such as those covering grievance management, anti-sexual harassment, training and disciplinary procedures) as well as the duties and rights of the contractor as well as contract workers.
- The contractor will need to be informed of the compliance requirements (even though the contractor may have the requisite compliance records) under the ESMS.
- A documentary proof of these induction trainings may be maintained outlining the duly signed list of participants, training covered and the minutes thereunder.
- Lightstorm will ensure that the contractors and contract workers be provided EHS trainings along with the direct employees on pertinent aspects as suggested under Section 5 of this ESMS.

Monitoring of Contractor's Regulatory Compliance

- Surprise audits are conducted during the process of installation and commissioning by the subcontractors by the designated LDC engineer for HSE compliance

Annexure 1 – Code of Conduct for Contractors

Lightstorm aims to conduct the business and project activities in a manner that protects the environment and promotes the safety, health and wellbeing of their employees, as well as those involved with the business and projects including contractors. These commitments are articulated in the **ESMS Policy of Lightstorm**.

Lightstorm expects its contractors to undertake project activities in line with these key commitments and other supporting policies or working practices as specified by Lightstorm.

Lightstorm requires its contractors to comply with all applicable state level and national E&S laws and regulations.

Lightstorm expects the contractors to comply with Lightstorm HSE contractual clauses within the terms of engagement. The contractor will be required to establish and maintain appropriate HSE management processes and systems to manage EHS risks and impacts. Contractors will seek to apply good practices with respect to HSE within the purview of the project activities.

This Code of Conduct applies to all contractors engaged by Lightstorm and will include their employees, their sub-contractors and the employees of such sub-contractors working on Lightstorm projects.

Contractor's obligations

HEALTH AND SAFETY

Lightstorm expects the contractors to operate and maintain a healthy and safe workplace through the implementation of appropriate health and safety standards to manage risks and promote continuous performance improvement.

Contractors will ensure they have the skills, knowledge, training and resources necessary to maintain a safe and healthy working environment.

Contractors will report to Lightstorm all work-related HSE incidents associated with the projects, and will appropriately investigate and implement corrective measures in line with Lightstorm's SOP on Incident Reporting & Recording.

Contractors are required to have emergency response protocols in place to deal with emergency incidents.

ENVIRONMENT

Contractors will seek to minimise adverse impacts of project activities on the environment through implementation of adequate mitigation and control measures.

Contractors are encouraged to implement measures to improve their environmental performance, including:

- Ensuring efficient use of water during project activities;
- Reducing waste generation; and

- Reducing emissions to air, water and land.

WORKER MANAGEMENT

- Contractors, and their sub-contractors, will comply with applicable labor laws and regulations and international human rights standards.
- Contractors are encouraged to provide workers with access to a formal grievance mechanism to enable concerns or complaints to be raised and addressed in a timely manner.

APPENDIX J PROJECT EXCLUSION LIST

The DFC has identified a list of Categorically Prohibited Projects where potential adverse environmental or social impacts of the project preclude DFC support.

Based on the DFC requirement, and within the context of Lightstorm's business, projects that fall under any of the following types will not be considered by Lightstorm.

- Resettlement of 5,000 or more persons.
- Any impact on natural World Heritage Sites <https://whc.unesco.org/en/list/> unless it can be demonstrated through an environmental assessment that the project (i) will not result in the degradation of the protected area and (ii) will produce positive environmental and social benefits.
- Any impact on areas on the United Nations List of National Parks and Protected Areas <https://www.protectedplanet.net/> unless it can be demonstrated through an environmental assessment that the project (i) will not result in the degradation of the protected area and (ii) will produce positive environmental and social benefits.
- Extraction or infrastructure in or impacting: protected area Categories I, II, III, and IV (Strict Nature Reserve/Wilderness Areas and National Parks, Natural Monuments and Habitat/ Species Management Areas), as defined by the International Union for the Conservation of Nature (IUCN). Projects in IUCN Categories V (Protected Landscape/Seascape) and VI (Managed Resource Protected Area) must be consistent with IUCN management objectives <https://www.protectedplanet.net/> unless it can be demonstrated through an environmental assessment (i) there is no degradation of the protected area and (ii) there are positive environmental and social benefits.
- Use of forced labor¹ or child labor²
- Projects or companies known to be in violation of local applicable law related to environment, health, safety, labor, and public disclosure.

¹ Forced labor means all work or service, not voluntarily performed, that is exacted from an individual under threat of force or penalty, such as indentured labor, bonded labor, or similar labor-contracting arrangements

² Child labor means the employment of children (persons below the age of 18) that is economically exploitative, or is likely to be hazardous to or interfere with the child's education, or be harmful to the child's health or physical, mental, spiritual, moral, or social development

APPENDIX K INTERNAL AUDIT CHECKLIST FOR EHS AND LABOR ASPECTS

Name of Project _____ Date of
Audit _____

Audit conducted by _____ Approved
by _____

S. No.	Aspect	Details	Remarks/ Non Compliances
	Contract Workers	Status	Remarks/ Non Compliances
1.	Are there contract workers engaged for any work onsite? If yes, following questions need to be answered.	Yes ☐ No ☐ NA ☐	
A	Minimum wages paid for contract workers onsite (are wages as per the latest notification) - check for males and females and workers categories- unskilled, semi-skilled, skilled, highly skilled. (review of wage register)	Yes ☐ No ☐ NA ☐	
B	Working hours in accordance with Labor Laws (review of attendance records)	Yes ☐ No ☐ NA ☐	
C	Overtime wages paid by contractor for contract workers onsite (review of wage register)	Yes ☐ No ☐ NA ☐	
2.	Any child labor observed at site (review of age proof documents)	Yes ☐ No ☐ NA ☐	
3.	Are there migrant workers engaged onsite? Please state the number. If yes, check applicability for Interstate Migrant Workers Act	Yes ☐ No ☐ NA ☐	

S. No.	Aspect	Details	Remarks/ Non Compliances
	1979 and whether valid registration is in place.		
4.	Has the contractor (if any) obtained Contract Labor Licenses under Contract Labor (Regulation and Abolition) Act, 1970	Yes ☐ No ☐ NA ☐	
5.	Are workers being provided Provident Fund and ESIC?	Yes ☐ No ☐ NA ☐	
6.	Is the Grievance redressal system implemented and well documented?	Yes ☐ No ☐ NA ☐	
7.	Number of grievances reported by workers/ employees in this quarter		
8.	<i>List actions to be taken by Contractor</i> 1. 2. 3.		<i>To be completed by</i> 1. 2. 3.
	General EHS	Status	Remarks/ Non Compliances
9.	Potable water available for workers and staff?	Yes ☐ No ☐ NA ☐	
10.	Smoking and alcohol consumption areas designated at offices?	Yes ☐ No ☐ NA ☐	
11.	Are confined spaces labelled?	Yes ☐ No ☐ NA ☐	
12.	Runoff control measures in place and in good condition?	Yes ☐ No ☐ NA ☐	
13.	Daily wage rates displayed at office?	Yes ☐ No ☐ NA ☐	
14.	External grievance register maintained?	Yes ☐ No ☐ NA ☐	

S. No.	Aspect	Details	Remarks/ Non Compliances
15.	E&S Permits are being tracked and complied with? Note non-compliances, if any.	Yes ☐ No ☐ NA ☐	
16.	Adequate Toilet provided at site	Yes ☐ No ☐ NA ☐	
17.	Condition of washroom / pantry and other area w.r.t. hygiene	Yes ☐ No ☐ NA ☐	
18.	Sanitization frequency and condition	Yes ☐ No ☐ NA ☐	
	Emergency Preparedness	Status	Remarks/ Non Compliances
19.	Emergency contact numbers displayed at offices?	Yes ☐ No ☐ NA ☐	
20.	Fire extinguishers readily available, and identified?	Yes ☐ No ☐ NA ☐	
21.	Fire extinguishers periodically inspected, maintained and tagged at all locations?	Yes ☐ No ☐ NA ☐	
22.	First aid kit(s) available and inspected weekly?	Yes ☐ No ☐ NA ☐	
	Personnel Protective Equipment	Status	Remarks/ Non Compliances
23.	Hard hats worn where there is danger of head injury?	Yes ☐ No ☐ NA ☐	
24.	Safety glasses worn by all employees and workers/ maintenance staff?	Yes ☐ No ☐ NA ☐	
25.	Safety boots worn by all employees and workers/ maintenance staff?	Yes ☐ No ☐ NA ☐	
26.	Personal fall protection used for working at height?	Yes ☐ No ☐ NA ☐	
27.	Hearing protection available and used when needed?	Yes ☐ No ☐ NA ☐	

S. No.	Aspect	Details	Remarks/ Non Compliances
28.	Goggles or face shields provided and used when welding, grinding or chipping?	Yes ☐ No ☐ NA ☐	
29.	Insulating rods available and used by maintenance staff?	Yes ☐ No ☐ NA ☐	
	Chemical, Oil and Waste Storage and Handling	Status	Remarks/ Non Compliances
30.	All flammable liquid supplies are kept in sealed containers in flammable safety cabinets in designated storage areas?	Yes ☐ No ☐ NA ☐	
31.	All loose oily rags and waste stored in proper covered containers?	Yes ☐ No ☐ NA ☐	
32.	All trash and combustible material removed from office premises as necessary?	Yes ☐ No ☐ NA ☐	
33.	Covered, labelled and separate dust bin for dry and wet waste collection	Yes ☐ No ☐ NA ☐	
34.	Separate storage of Hazardous material	Yes ☐ No ☐ NA ☐	
35.	Disposal of waste and records	Yes ☐ No ☐ NA ☐	
	Maintenance Work Areas	Status	Remarks/ Non Compliances
36.	Housekeeping well maintained?	Yes ☐ No ☐ NA ☐	
37.	Maintenance work areas kept free of slipping, tripping, cutting and falling hazards, barricading of trenches?	Yes ☐ No ☐ NA ☐	
	Electrical Hazards at Office	Status	Remarks/ Non Compliances
38.	Covers installed on all outlets, switches, junction boxes, pull boxes, panel boards, etc., that are in service at the office?	Yes ☐ No ☐ NA ☐	

S. No.	Aspect	Details	Remarks/ Non Compliances
39.	All circuits identified at panel boards?	Yes ☐ No ☐ NA ☐	
40.	Extension cords in good condition (not frayed, broken) with current inspection markings?	Yes ☐ No ☐ NA ☐	
41.	Extension cords and other temporary wiring protected from damage and arranged so as not to create tripping hazards?	Yes ☐ No ☐ NA ☐	

APPENDIX L EHS PERFORMANCE REPORTING REPORTS

Quarterly EHS Reports

Prepared by – Name of contractor
Reviewed by – Site HSE Representative
Submitted to – E&S Lead

EHS Report for <Name of Project>

Date of submission:			
Staff and worker details (strength)			
List any events ³ that may have caused damage; brought about injuries or fatalities or other health problems; attracted the attention of outside parties; affected project labor or adjacent populations; affected cultural property; or created liabilities for your company?	Not applicable ☐ Applicable ☐ - Details provided below		
Accidents and incidents reported – both occupational and community related (public);	Health and Safety Incidents	Number	Details⁴
	Fatalities		1. Date(s) of fatality: 2. Cause of fatality: 3. Corrective or preventive measures to prevent reoccurrence:
	Accident		1. Date(s) of accident: 2. Cause of accident 3. Corrective or preventive measures to prevent reoccurrence:
	Near Miss		1. Date(s) of near miss: 2. Cause of near miss: 3. Corrective or preventive measures to prevent reoccurrence:

³Examples of significant incidents follow- natural hazards, fire or unplanned events, including during transportation; ecological damage/destruction; local population impact; legal/administrative notice of violation; penalties, fines, or increase in pollution charges; negative media attention; chance cultural finds; labor unrest or disputes; local community concerns.

⁴ Provide additional sheets as needed – Accident / Incident Investigation Form.

	Total man-hours worked (total hours worked by all employees)		1. During the current reporting period 2. During the last reporting period		
	Total Lost Work Days ⁵		1. During the current reporting period 2. During the last reporting period		
	Lost Time Injury Frequency Rate (LTIFR ⁶)		1. During the current reporting period 2. During the last reporting period		
Summary of trainings provided on environment, health, and safety issues ⁷	For each type of training, list the date and number of employees that attended during this reporting period.				
Environmental and safety non-compliances identified by the local regulatory authorities, if any					
Any upcoming E&S license/permit renewal (as applicable)					
Any community engagement activities	Activity Description		Total Individuals Benefited	Total Budget/ Total Expenditures/ % of Total	Completion Date
Details of community complaints or grievances received in this reporting period	Type of Grievance	Number of Cases	% of Grievances Closed	Total Monetary Impact	Grievances forwarded for Legal Redress

⁵ Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness. This is also referred to as Lost Time.

⁶ Lost Time Injury Frequency Rate per 1 million man hours worked = (Number of lost time injuries in the reporting period)*1,000,000 / (Total Employee Strength * Working hours per day * Working days per week * number of weeks)

⁷ Personnel should be trained in accident prevention, safe construction practices, proper control and maintenance of equipment and facilities, emergency response, personal protective equipment (PPE usage), emergency response, etc.

Any E&S targets adopted by the Project for resource conservation? If yes, provide details	
Details of any litigations/ filed against the Project	

APPENDIX M ANNUAL EHS PERFORMANCE REPORT
{to be prepared by E&S Lead and submitted to Board on an annual basis}

Annual EHS Performance Report on all Projects Prepared and submitted by: Lightstorm Submitted to: Board
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Date of submission:				
Reporting Period:				
Status of each Project (tick as applicable)	Name of Project	Construction	Operation	Major Maintenance
			✓	
Expected or Actual Commissioning dates:	Name of Project	COD		
List of events ⁸ that may have caused damage; brought about injuries or fatalities or other health problems; attracted the attention of outside parties; affected project labor or adjacent	Name of Project	Details		

⁸ Examples of significant incidents follow. Natural hazard, fire and unplanned events, including during transportation; damage/destruction; local population impact, complaint or protest;; legal/administrative notice of violation; penalties, fines; negative media attention; chance cultural finds; labor unrest or disputes; local community concerns.

populations; affected cultural property; or created liabilities for the company	Not applicable ☐							
Status of completion of recommendations from EHS Risk Screening Reports or from external audits	S. No	Name of Project	Pending Corrective Action / recommendation	Status	Budgeting	Key Remarks	Document Submitted	
	Not applicable ☐							
Accidents and incidents Details	Name of Project	No. of Fatalities	No. of Accidents	No. of Near Miss	Total man-hours worked (total hours worked by all employees)	Total Lost Work Days⁹	Lost Time Injury Frequency Rate (LTIFR¹⁰)	Community related accidents/ incidents
Summary of trainings provided on	Name of Project		Type of training and date			Number of employees		

⁹ Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness. This is also referred to as Lost Time.

¹⁰ Lost Time Injury Frequency Rate per 1 million man hours worked = (Number of lost time injuries in the reporting period)*1,000,000 / (Total Employee Strength * Working hours per day * Working days per week * number of weeks)

environment, health, and safety issues ¹¹							
	<i>For each type of training, list the date and number of employees that attended during this reporting period.</i>						
Environmental and safety non-compliances identified by the local regulatory authorities	Name of Project		Details				
Community engagement activities	Name of Project		Activity Description	Total Individuals Benefited	Total Budget/ Total Expenditures/ % of Total	Completion Date	
Details of community complaints or grievances received in this reporting period	Name of Project		Type of Grievance	Number of Cases	% of Grievances Closed	Total Monetary Impact	Grievances forwarded for Legal Redress
Details of internal / external EHS audits conducted for the Project	Name of Project		Type and Date of Audit		Key Non-Compliances	Corrective Actions and status	

¹¹ Personnel should be trained in accident prevention, safe lifting practices, proper control and maintenance of equipment and facilities, emergency response, personal protective equipment (PPE), emergency response, etc.

Details on EHS targets adopted by the company and projects	EHS Target (KPIs)	Status	
Details of any litigations/ filed against the projects or the company	Name of Project	Details of Litigation/ court case	Actions taken by the company

APPENDIX N PROCEDURE ON MANAGEMENT OF CHANGE

1.0 Scope

This procedure identifies Management of Change (MOC) as part of the ESMS and applies to all operations of Lightstorm. Lightstorm is responsible for the development and implementation of MOC procedure for changes and modifications to project network components, types, facilities and operations related to Lightstorm projects.

2.0 Application

The MOC procedure applies to changes in facilities (components, equipment, operating procedures, materials and project conditions) as well as changes in operating personnel. Whenever these changes are planned or if they occur out of operational necessity, the MOC procedure shall be implemented prior to the change.

2.1 Changes in facilities

- Changes in facilities arise whenever the process or mechanical design is altered, material/ equipment specifications change, design change, route or layout change, control systems are modified, or materials of construction change.

2.2 Changes in personnel

- Changes in personnel, including contractual personnel, occurs whenever there is a change in the organization or in personnel that supervise or operate the facility.
- Routine personnel vacancies and replacements, and shift changes do not require MOC action.
- Supervisory changes for Project.
- Changes in contractors (one company to another).

2.3 Other changes

- Regulatory changes – amendment in existing regulations or introduction of new regulations that trigger additional permit requirements for projects.
- New lender requirements.

3.0 Procedure

This MOC procedure and associated Form address the basis for the change, the impact the change will make on EHS aspects, the time period to implement the changes, and the management and field approval process. Refer to Attachment A: MOC Form.

- Initiator of MOC (E&S Lead) completes following information:
 - MOC Type: write in either Facilities or Personnel
 - Project or Location name
 - Name of person initiating MOC
 - Date initiated
- Initiator of MOC completes Section 1:
 - Description of change: what is the change?
 - Reason for change: why are you making the change?
 - Enter start and end dates and times (estimate times). Impact change will make on environment, health, safety and social aspects: explain.
- Approval Process:
 - Personnel authorized to approve changes include the President director, post review of the department head related to the area of change.

Once MOC has been approved, affected personnel are made aware of and/or trained in the system associated with the change prior to the implementation of the change.

E&S Risk Register shall be updated based on the identified change.

If MOC results in a change in the SOP, changes will be made and documented as per the document control guidelines.

4.0 Recordkeeping

4.1 Copies of the MOC will be maintained at the project site office.

4.2 All MOC forms for a project shall be maintained as per document control guidelines as part of the ESMS.ss

Attachment A

Management Of Change (MOC) Form

M.O.C. Type: (Facilities or Personnel): _____

Project / Site: _____

Initiator (Name): _____

Date: _____

Section 1: To be completed by Initiator/E&S Lead

DESCRIPTION OF CHANGE (explain): _____

REASON FOR CHANGE (explain): _____

IMPACT CHANGE WILL HAVE ON HEALTH, OPERATING PROCEDURES, SAFETY, SOCIAL (explain):

Section 2: To be completed by _____

Approved: Y / N

Denied: Y / N

Edit SOP: Y / N

Comments: _____

Signature/ Date: _____

Section 3: To be completed by _____.

E&S Risk Register Prepared: Y / N

New Permit required: Y / N

Trainings provided: Y / N

Signature/ Date: _____



