



E&S Annual Compliance Monitoring Report of Cleantech Solar

ABRIDGED FOR DISCLOSURE

October 2022

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Acronyms and Abbreviations

C&I	Commercial and Industrial
CEIG	Chief Electricity Inspectorate to Government
CFM	Climate Fund Managers B.V.
CI1	Climate Investor One
E&S	Environmental and Social (interchangeable with HSSE)
EHS	Environmental, Health and Safety
EPC	Engineering, Procurement and Construction

ESAP	Environmental and Social Action Plan
ESG	Environmental and Social Governance
ESMS	Environmental and Social Management System
FPIC	Free, Prior, and Informed Consent
GIIP	Good International Industry Practice
HSE	Health, Safety and Environment
HSSE	Health and Safety, Social and Environmental (interchangeable with E&S)
HSSE&SP	Health, Safety, Security, Environment and Social Performance
IC	Investment Committee
IFC	International Finance Corporation
IFC PS	International Finance Corporation Performance Standards
ILO	International Labour Organisation
KPI	Key Performance Indicator
NOC	No Objection Certificate
O&M	Operations and Maintenance
OHS	Occupational Health and Safety
UN	United Nations

1. Introduction

1.1 Overview

Climate Investor One (CI1) provided corporate equity investment to a portfolio of rooftop solar projects in India (the "Project"), which are being developed by Cleantech Solar Asia Pte Ltd ("Cleantech" or "the Company") in September 2018. Cleantech Solar is a renewable energy developer that finances, constructs, owns and operates solar projects. Headquartered in Singapore, Cleantech operates across India and Southeast Asia, and has an on-the-ground project team in India. The investment from CI1 is an equity investment to selected Cleantech solar rooftop projects in India.

This report summarises the findings of the environmental and social (E&S) compliance monitoring undertaken for the audit review period November 2021 to October 2022 by Climate Fund Managers (CFM). This report consolidates information from different sources.

1.2 Scope of Work

The scope of work of the E&S compliance monitoring conducted by CFM included the following:

- A review of existing Project documentation, including documents pertaining to Cleantech's ESMS and their implementation thereof, as well as documents pertaining to E&S management of their current assets;
- A review of monthly E&S monitoring data submitted by Cleantech;
- Interviews with key internal (Cleantech) stakeholders;
- Evaluating the Project against the requirements of the E&S Reference Framework to identify compliance gaps;
- Identifying key current E&S risks and impacts associated with the Project and assessing the significance (low, medium or high) of each identified risk to identify risks that need to be addressed (this will include any gaps in compliance);
- Identifying actions required to address compliance gaps, key identified risks/impacts.

This document presents the results of CFM's E&S compliance monitoring of Cleantech for public disclosure.

1.3 Applicable Standards

CFM is committed to responsible investments, and requires all of the projects in which it invests CI1 Funds to adhere to all applicable national legislative requirements, as well as international best practice standards for E&S risk and impact assessment and management. Specifically, CFM requires all projects receiving CI1 funds to comply with the following Reference Framework:

- National legislation applicable to health and safety, social and environmental (HSSE) issues, including labour and working conditions – see Section 1.4;
- International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability (2012) – see Section 1.5;
- World Bank Group General and any applicable Industry Sector Environmental, Health and Safety (EHS) Guidelines – these are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP) that are referenced in the IFC PS;

- International Labour Organisation (ILO) Core Labour Standards and Basic Terms and Conditions of Work; and
- International Bill of Human Rights and United Nations (UN) Guiding Principles on Business and Human Rights.

1.4 Applicable National Legislation

The Project includes Cleantech's projects in India in the current portfolio and pipeline. A summary of applicable laws is provided below: -

- Government Resolution No. Misc. - 03/2015/C.N.34/A-2 on 12th May 2015 and 30th September 2015. For direct purchase through private negotiation.
- Maharashtra's Comprehensive Policy for Grid connected Power Projects based on New and Renewable (Non-conventional) Energy Sources, 2015
- Environment Protection Act, 1986 and as amended
- The Water (Prevention and Control of Pollution) Act, 1974, as amended
- The Air (Prevention and Control of Pollution) Act 1981, as amended
- The Noise (Regulation & Control) Rules, 2000 and as amended up to 2010
- Waste Management
- Solid Waste Management Rules, 2016 as amended
- Hazardous and Other Wastes (Management and Transboundary Movement) Rules, 2016 as amended
- Construction and Demolition Waste Management Rules, 2016
- Batteries (Management and Handling) Rules, 2001
- E-waste (Management) Rules, 2016
- Storage of hazardous chemicals
- Manufacture, storage and import of hazardous chemicals (MSIHC) Rules, 1989 and as amended
- The Factories Act, 1948 and Maharashtra Factories Rules, 1963 as amended
- The Contract Labour (Regulation and Abolition) Act, 1970 and Central Rules 1975
- Inter-state Migrant Workmen (Regulation of Employment and Condition of Service) Act, 1979
- Child Labour (Prohibition and Regulation) Act, 1986
- Bonded Labour Systems (Abolition) Act, 1976
- Minimum Wages Act, 1948
- Equal Remuneration Act, 1976
- Workmen's Compensation Act, 1923
- Indian Maternity Benefit (Amendment Act), 2017
- Employees' Provident Fund and Miscellaneous Provisions Act, 1952
- Employees State Insurance Act, 1948
- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- Private Security Agencies (Regulation) Act, 2005
- Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act, 1996; and payment of cess under the BoCW Act.

EIA Notification 2006 is the relevant legislation for the EIA requirement in India. Solar projects, however, are exempt from obtaining EIA approval.

The following approvals are required to be obtained by Cleantech for each asset:

- No Objection Certificate (NOC) from Distribution Company
- Chief Electricity Inspectorate to Government (CEIG)
- Approval from State Nodal Agency, as required

1.5 IFC Performance Standards

In accordance with the CFM/CI1 ESMS, all projects receiving CI1 funds are required to conduct their operations in accordance with the applicable requirements of the IFC Performance Standards (PS). The eight PS and their applicability to the Project are discussed in Table 1 below.

Table 1: Applicability of the IFC PS to the Project

IFS PS	Summary of Requirements	Applicability to Project
P1: Assessment and Management of Environmental and Social Risks and Impacts	<ul style="list-style-type: none"> • Identify and assess environmental and social risks and impacts; • Develop and implement an appropriate environmental and social management system (ESMS) to integrate E&S standards and management programmes to address E&S risks and impacts into business operations. • Include provisions for external grievance mechanisms in the ESMS. 	Applicable to all Cleantech operations, including at asset-level
PS2: Labour and Working Conditions	<ul style="list-style-type: none"> • Treat workers fairly. • Provide safe and healthy working conditions. • Avoid the use of child or forced labour, • Identify risks in the primary supply chain. <p>(Requirements are guided by the ILO and UN Human Rights conventions)</p>	Applicable to all Cleantech operations, including at asset level.
PS3: Resource Efficiency and Pollution Reduction	<ul style="list-style-type: none"> • Promote more sustainable use of resources, including energy and water; • Integrate practices and technologies to avoid or minimise the potential adverse impacts of pollution from project activities. 	Applicable at asset-level, but Cleantech must ensure that adequate requirements for asset-level management of risks in this regard are included in its ESMS.
PS4: Community Health, Safety and Security	<ul style="list-style-type: none"> • Adopt responsible practices to reduce risks to local communities through adequate emergency preparedness and response planning, responsible safeguarding of personnel and property, and by incorporating safety measures into design. 	Applicable at asset-level, but Cleantech must ensure that adequate requirements for asset-level management of risks in this regard are included in its ESMS.
PS5: Land Acquisition and Involuntary Resettlement	<ul style="list-style-type: none"> • Avoid involuntary resettlement wherever possible and, where avoidance is not possible, minimise the impact through mitigation measures such as fair compensation and livelihood improvements. 	Not applicable for rooftop solar projects and Cleantech will confirm this before proceeding with a project. The Projects will not require land (an agreement is negotiated with the property owner for use of the roof) and therefore no physical and/or resettlement impacts are anticipated. Should any future Project pipeline assets involve

IFS PS	Summary of Requirements	Applicability to Project
		activities that necessitate physical or economic displacement, the Cleantech ESMS should be updated to include requirements for asset-level management of risks and impacts in this regard.
PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	<ul style="list-style-type: none"> • Protect and conserve biodiversity. • Maintain the benefits from ecosystem services. • Promote the sustainable management of living natural resources through the adoption of practices that integrates conservation needs and development priorities. 	Not applicable for rooftop solar projects and Cleantech will confirm this before proceeding with a project. Cleantech assets are unlikely to pose risks to biodiversity or living natural resources. Should any future Project pipeline assets pose risks in this regard, the Cleantech ESMS should be updated to include requirements for asset-level management of such risks.
PS7: Indigenous Peoples (IP)	<ul style="list-style-type: none"> • Anticipate and avoid adverse impacts on communities of IP, or where avoidance is not possible, minimise adverse impact. • Foster respect for the human rights, dignity and culture of IP. • Promote sustainable development benefits for IP in culturally appropriate manner. • Promote informed consultation and participation of IP communities. In certain circumstances, Free, Prior, and Informed Consent (FPIC) is required. 	Not applicable for rooftop solar projects and Cleantech will confirm this before proceeding with a project. Cleantech assets are unlikely to pose risks to communities of IP. Should any future Project pipeline assets pose risks in this regard, the Cleantech ESMS should be updated to include requirements for asset-level management of such risks.
PS8: Cultural Heritage	<ul style="list-style-type: none"> • Protect cultural heritage from the adverse impacts of project activities and support its preservation. • Promote the equitable sharing of benefits from the use of cultural heritage. 	Not applicable for the rooftop solar projects and Cleantech will confirm this before proceeding with a project. Cleantech assets are unlikely to pose risks to cultural heritage. Should any future Project pipeline assets pose risks in this regard, the Cleantech ESMS should be updated to include requirements for asset-level management of such risks.

2. Project Activities

2.1 Overview

The rooftop solar projects are installed on brownfield commercial and industrial (C&I) buildings in India. The offtakers are mainly in the manufacturing sector (e.g., automotive, aviation and aerospace, agricultural, building and construction, chemicals, food and beverage, textile, pharmaceuticals) as well as commercial, engineering, education. For each rooftop installation, Cleantech enters into a leasing contract with the facility owner for the roof area on which the solar panels will be installed. The project’s transformers and inverter houses are also located within the facility’s premises. There are no other associated facilities (i.e., transmission line, substation). Each

project is <1 MWp, although larger projects (e.g., on multiple roofs at industrial parks) may be up to 5 MWp. Cleantech develops the projects through Engineering, Procurement and Construction (EPC) contractors. Cleantech outsources operations to Operations and Maintenance (O&M) contractors and the scope includes activities like cleaning of panels, testing of mounting structures, electrical circuit maintenance etc. The contractors work under instructions of Cleantech’s Project and O&M teams.

2.2 Status

At the time of the E&S compliance assessment of the Project, Cleantech’s rooftop solar portfolio In India comprised of 91 assets ranging from 0.1 MWp to 5 MWp of current assets, which are all in operation and maintenance (O&M) stage. The projects are set out in Table 2 below.

Table 2: Status of Cleantech’s current assets as of October 2022

[Details of rooftop solar projects in India removed for disclosure]

3. HSSE Performance Review

3.1 Permits

All projects have obtained the relevant permits, namely:

- No Objection Certificate (NOC) from Distribution Company
- Chief Electricity Inspectorate to Government (CEIG)
- Approval from State Nodal Agency, as required.

3.2 HSSE Legal Compliance

No compliance issues have been reported during the audit review period.

3.3 Health and Safety Performance

Cleantech has reported H&S performance data on a monthly basis during the audit review period. Refer to Table 3 and Table 4 [Data removed for disclosure]. No issues have been identified in the E&S compliance audit.

Table 3: Cleantech Health and Safety Performance Data

	Nov '21	Dec '21	Jan '22	Feb '22	Mar '22	Apr '22	May '22	Jun '22	Jul '22	Aug '22	Sep '22	Oct '22	Total
Number of security incidents													
Number of Fatalities													
Number of High Potential Incidents (HPIs)													
Number of injuries													
Number of incidents involving damage to plant or property													
Number of Lost Time Injuries													

Number of Days lost due to injuries													
Number of near misses reported													
Number of hazardous situations / safety observations													
Number of hazardous situations/safety observations/unsafe act/non-compliance incidents resolved													
Lost time injury Frequency rate on projects/activities													
Lost time injury: Severity rate on projects/activities													

Table 4: Cleantech Leading Training and Audit Indicators Data

	Nov '21	Dec '21	Jan '22	Feb '22	Mar '22	Apr '22	May '22	Jun '22	Jul '22	Aug '22	Sep '22	Oct '22	Total
Total Number of people inducted for HSSE													
Total Number of people receiving HSSE training sessions													
Number of HSSE Audits on Contractors													

3.4 Environmental Performance

Cleantech has reported environmental performance data on a monthly basis during the audit review period. Refer to Table 5 [Data removed for disclosure]. No issues have been identified in the E&S compliance audit.

Table 5: Cleantech Environmental Performance Data

	Nov '21	Dec '21	Jan '22	Feb '22	Mar '22	Apr '22	May '22	Jun '22	Jul '22	Aug '22	Sep '22	Oct '22	Total
Number of Environmental incidents													
Energy consumption (kwh) - Offices													
Energy consumption (kwh) - assets													
Water consumption (m ³) - offices													

Water consumption (m3)													
Volume of solid waste disposal to landfill (kg) - Offices													
Volume of solid waste disposal to landfill (kg) - assets													
Volume of solid waste recycled (kg) - Offices													
Liquid effluents discharge (m ³) - assets													
Emissions to air (CO ₂ -equiv) - assets													

3.5 Social Performance

3.5.1 Incidents of Forced Labour and Child Labour

No incidents were reported from November 2021 to October 2022.

3.5.2 Worker Complaints, Grievances and Resolution

Grievances are recorded in the worker grievance log (including Cleantech staff, contractors and subcontractors). No external grievances were reported from November 2021 to October 2022.

3.5.3 External Complaints, Grievances and Resolution

Cleantech has an online Grievance Mechanism in place, which is called "EthicsLine" (previously called EthicsLine) where any stakeholder can file a grievance anonymously:
<https://cleantechsolar.com/who-we-are/sustainability/grievances/>

For each project, there is a site specific GRM that will allow for grievances from stakeholders to be filed and effective redressal steps will be implemented to address these grievances.

No external grievances were reported from November 2021 to October 2022 and Cleantech confirmed that none had been received.

3.6 Gender Disaggregated Labour Data

Cleantech has reported labour disaggregated data on a monthly/quarterly basis during the audit review period. Refer to Table 6 and Table 7 [Data removed for disclosure]. No issues have been identified in the E&S compliance audit.

Table 6: Cleantech Gender Disaggregated Labour Data

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	Q4 2021	Q1 2022	Q2 2022	Q3 2022	Q4 2022	Total
Employee headcount (Mgmt, Senior, Junior, Interns)						
Total number of new jobs created (#Male, #Female)						
Total number of males and females in permanent roles (#Male, #Female)						

Table 7: Cleantech Contractor/Workers Engaged by Third-Party Data

	Nov '21	Dec '21	Jan '22	Feb '22	Mar '22	Apr '22	May '22	Jun '22	Jul '22	Aug '22	Sep '22	Oct '22	Total
Construction Workers													
Number of Construction workers engaged: (Men / Women)													
Number of Construction hours worked (Men / Women)													
O&M Workers													
Number of O&M workers engaged: (Men / Women)													
Number of O&M hours worked (Men / Women)													

4. Compliance with International Finance Corporation (IFC) Performance Standards

4.1 Compliance Assessment Findings Against Relevant IFC PS

A compliance assessment against the relevant IFC PS is provided in the following table.

Table 8: Assessment against the IFC PS

S/N	IFC PS Elements	Findings	Follow up Actions Required
PS1: Assessment and Management of Environmental and Social Risks and Impacts			
1.1	Environmental and Social Assessment and Management System	Based on the audit findings, no issues were identified.	No
1.2	Identification of Risks and Impacts Process	Based on the audit findings, no issues were identified.	No
1.3	Management Programmes	Based on the audit findings, no issues were identified.	No
1.4	Organisational Capacity and Competency	Based on the audit findings, no issues were identified.	No
1.5	Emergency Preparedness and Response (EPRP)	Based on the audit findings, no issues were identified.	No
1.6	Monitoring and Review	Based on the audit findings, no issues were identified.	No
1.7	Stakeholder Engagement	Based on the audit findings, no issues were identified.	No
1.8	External Communications and Grievance Mechanism	Based on the audit findings, no issues were identified.	No
PS2: Labour and Working Conditions			
2.1	Human Resources Policies and Procedures	Based on the audit findings, no issues were identified.	No
2.2	Working Conditions and Terms of Employment	Based on the audit findings, no issues were identified.	No
2.3	Workers' Organization	Based on the audit findings, no issues were identified.	No
2.4	Non-Discrimination and Equal Opportunity	Based on the audit findings, no issues were identified.	No
2.5	Retrenchment	Based on the audit findings, no issues were identified.	No
2.6	Internal Grievance Mechanism	Based on the audit findings, no issues were identified.	No

S/N	IFC PS Elements	Findings	Follow up Actions Required
2.7	Child Labour and Forced Labour	Based on the audit findings, no issues were identified.	No
2.8	Occupational Health and Safety (OHS)	Based on the audit findings, no issues were identified.	No
2.9	Workers Engaged by Third Parties	Based on the audit findings, no issues were identified.	No
2.10	Supply Chain	Based on the audit findings, no issues were identified.	No
PS3: Resource Efficiency and Pollution Reduction			
3.1	Water and Wastewater Management	Based on the audit findings, no issues were identified.	No
3.2	Waste Management	Based on the audit findings, no issues were identified.	No
3.3	Hazardous Material Management	Based on the audit findings, no issues were identified.	No
3.4	Air/Soil/Water Pollution	Based on the audit findings, no issues were identified.	No
3.5	Energy Use and Conservation	Based on the audit findings, no issues were identified.	No
3.6	Greenhouse Gas Emissions	Based on the audit findings, no issues were identified.	No
PS4: Community Health, Safety and Security			
4.1	Community Health and Safety	Based on the audit findings, no issues were identified.	No

5. Community Development

In accordance with CI1 requirements, Cleantech has been implementing a community development programme since 2020. This has included the following projects: -

- In 2020, Cleantech partnered with CARE India to implement a pilot programme in 10 villages in Buldana district within the Vidarbha region in the state of Maharashtra. The target community was largely small and marginal cotton farmers and farm labourers. The women-centred programme was focused on encouraging the adoption of improved cookstoves to replace traditional cook stoves at the household level. The benefits of improved cookstoves reduce reliance on wood from local forests and improve indoor air quality, which has health benefits, especially for women and children.
- In 2021, through the implementation partner Husk, Cleantech funded construction of a 50 kW mini-grid site in Bihar, India. As a result of the intervention, 3,250 children at two high schools and a nursery benefit from access to clean energy. Training and employment of local people was provided by Husk for the operation and maintenance of the plant.
- In 2022, partnered with Dilasa to fund a programme to improve the socio-economic status of women and augmentation of agriculture production through water-based solutions in the Beed district in Maharashtra. The programme includes institution building, water resource development, social welfare activity and livelihood promotion. Beneficiaries included small irrigation farming households among the 438 households/2,642 residents in three villages. This community development intervention concluded successfully in 2022. Further information is provided below.

Hatkarwadi, Takalwadi and Bhanakwadi are water scarce villages in Beed district of Maharashtra. These villages practice rain-fed agriculture and mono-cropping. However, given the irregular rainfall in the last three years, several of these villages are faced with extreme poverty and malnutrition. Ninety-six percent of farmers here are small and marginal farmers unable to cope with the pressures of crop failure. Women in particular go through enormous difficulties. They are required to manage household work and contribute financially to the family as well as raise the children. Given the pressures due to failing agriculture, women from Beed often travel to places 400 km away to secure livelihoods. Quite often during peak summer period, most of these villages are deserted as everyone travels outside for work. Lack of sufficient water for drinking and farming is one of the key challenges faced by these villages.

Based on Cleantech Solar's detailed consultations with local communities, it decided to set up a rainwater-based stream rejuvenation program to improve the socioeconomic status of women and augment agricultural production in Beed. Cleantech Solar partnered with Dilasa – a Maharashtra-based non-profit, which had prior experience working in drought prone areas.



Community consultations with village members

The project interventions were designed on three major focus areas:

- Conservation of water resources and tackling water scarcity through innovative water-based solutions.
- Enhancing access of the villages to land, water and forests, thereby increasing the productivity of these resources
- Encouraging and facilitating on-farm and off-farm enterprise development focused on the needs of women.

Further based on field surveys, the following supporting activities were undertaken to ensure long-term sustainability of the program:

- Institution Building
- Water & Soil Conservation
- Social Welfare Activities
- Livelihood components

After one year of program implementation, the impact of the program is impressive. The project collaboration has yielded several tangible positive results. An impact assessment of the program conducted by Dilasa revealed that financial and agricultural infrastructure support provided to the communities through the project was effective in improving access to water resources, promotion of livestock-based livelihoods and has helped the communities in achieving a better standard of living that is financially and environmentally sustainable. Some of the important benefits of the program are as follows:

- A seven-kilometre-long stretch of the local stream was rejuvenated by the Dilasa team. This effort has helped immensely in storing rainwater and recharging groundwater, which is visible in the rise of water levels in the open wells. Drinking water sources have also been recharged to their optimum level and should be able to provide villagers with drinking water through the year.



Construction of Doha – before and after



Water in the Doha after the monsoon

- Fodder cultivation was undertaken in the local forest area and farmers wasteland covering an area of 20 acres. About 100 farmers received direct benefits through this activity.
- To promote horticulture, farmers were encouraged to graft over 7,400 saplings of local plant varieties. Of these, approximately 2,400 trees were planted along the sides of the Doha. Drumstick trees, which are fast-growing were also planted and provide a steady income to the farmers.
- Seedlings to grow kitchen gardens were provided to women from 200 households. While most used the vegetables for household consumption, over 40 women were able to grow surplus vegetables and sell the vegetables in local markets, which generated additional household income.



Mandabai, a resident of Takalwadi village

Mandabai is a resident of Takalwadi village. She has four children and her husband to support. Her husband was not able to contribute much due to lack of agricultural productivity. In 2019, the family's condition was difficult. They did not have even one proper meal a day. She was forced to migrate to a nearby town as a daily wage worker in a sugarcane farm. She had to stay away from her children and the safety of her home.

After Cleantech Solar's program 'Improvement in socio-economic status of women and augmentation of agricultural production through water-based solutions' was implemented by Dilasa, Mandabai is now back in her village. She was one of the beneficiaries and the kitchen garden set up through this program has been extremely useful. Dilasa provided the kitchen garden materials including seedlings, soil and manure, and gave the requisite training to undertake kitchen gardening. She planted tomatoes, brinjal, ladies' finger and some other vegetables. She understood the technical specifications well and planted them in an organised way for a better yield. When her kitchen garden started producing vegetables, she made a small profit of Rs.500 every week through sale of the vegetables. This has motivated her to spend more time and effort in maintaining her kitchen garden. It is now a source of livelihood and food security for her family. Moreover, she is earning as much as she did through her daily wage labour without having to leave home.



Women receiving kitchen garden kits

The project has established two community information centres at Bhanakwadi and Hatkarwadi. The local communities can now access information related to government schemes and services and with other information-related public services due to internet connectivity and printers being available. Further, one of these centres promotes micro entrepreneurship activities to include beekeeping, goat-rearing and modern agricultural techniques to enhance agricultural productivity.



Villagers and members from the Dilasa Team at the Community Information Centre in Bhanakwadi

To promote livestock management, 100 female goats and 10 male goats have been provided to 50 women from the three villages who have been trained in goat farming.

The community project has been successful in creating self-sustaining models of development that have been indigenously developed and address critical issues around water and livelihoods through women's empowerment.

Thus, it is evident that empowering local communities and making them co-contributors in their own development process by providing opportunities, resources and skills is the best way forward so that farmers can escape from the rural drought crisis.

6. Conclusion

Cleantech is continuing to scale up distributed solar energy in the C&I sector across India by investing in high-impact carbon abating projects that otherwise would not have been implemented, while at the providing jobs. In doing so, Cleantech contributes not only to the implementation of the United Nations Sustainable Development Goals, but also to raising the HSSE awareness and performance of Cleantech's contractors. Cleantech also funds community development programmes in India on an annual basis.

This assessment reviewed the compliance of the Project and the key HSSE risks and impacts associated with the current activities in relation to the applicable E&S Reference Framework, specifically the IFC PS. The assessment did not identify any risks or issues, which require follow up actions of the development of an ESAP.

The express commitment and efforts made by Cleantech with regards to complying with the E&S Reference Framework, especially the IFC PS are recognised.

Annex 1: Current Asset Photo Log

Photos removed for disclosure purpose.

Annex 2: Close Out of Earlier ESAP

The table below sets out the actions, which were agreed and subsequently undertaken by the Project to mitigate the potential risks/impacts and ensure compliance by the Project with the E&S Reference Framework requirements at the time of CI1's investment.

#	Reference	Requirements	Status / Progress
1.	IFC PS1 CFM ESMS	E&S Staffing:	Closed
2.	IFC PS1 CFM ESMS	HSSE Policy:	Closed
3.	IFC PS1 CFM ESMS	ESMS:	Closed
4.	IFC PS1 CFM ESMS	HSSE Performance Reporting:	Closed
5.	IFC PS1 CFM ESMS	Grievance Redressal Mechanism:	Closed
6.	IFC PS2 CFM ESMS	Labour and Working Conditions:	Closed
7.	IFC PS3 CFM ESMS	Resource Efficiency/Waste Management:	Closed
8.	CI1 ESMS	Community Development:	Closed