

ANNEX D MONITORING OF CONTRACTOR'S/SUBCONTRACTOR'S REGULATORY COMPLIANCE CHECKLIST

	Monitoring Of Contractor's/Subcontractor's Regulatory Compliance Checklist	Ver-00 DD/MM/YYYY
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KTZ team	Purpose of Monitoring	Aspects to be covered	Monitoring Mechanism	Timeline for Monitoring
EHS team	Ensure Contractor's & Sub-contractor compliance to ESMS & CEMS requirements Monitor Contractor's EHS performance	<ul style="list-style-type: none"> Safety Protocols & PPE usage by workers Following safety protocols in tasks Maintenance of documentation Toolbox meetings Emergency preparedness drills Environmental compliance (Air, Water, Noise, Dust, Waste Management) Continuous monitoring of stack emissions 	Accident Register Review	Weekly and Monthly
			Visual observation	Daily/Weekly – Include emission observation, waste disposal checks, and PPE use
			Discussion with Workers	Monthly – Include awareness on EHSS, grievance reporting for unsafe working conditions
			Discussion with Contractor	Monthly – Verify adherence to EHSS training and compliance with waste/emission regulations
			Review of grievances (if any)	Monthly – Add tracking for complaints related to environmental pollution, safety hazards
			Toolbox meetings /trainings (as applicable)	Daily and quarterly training
			CEMS Data Review (Waste management inspections, Air & Water quality monitoring, Noise & vibration monitoring, Bio-diversity Impact assessment)	Monthly – Ensure emissions compliance with national limits, identify exceedances, and enforce corrective actions
HR team	Ensure Contractor's compliance to project specific ESMS requirements Monitor Contractor's HR and Labour law compliance	<ul style="list-style-type: none"> Maintenance of registers as required by labour laws Valid registrations under labour laws Payment of wages Overtime work done and payment for the same 	Registration and certifications review	Based on validity of documents submitted
			Registers required by law	Monthly
			Records/ Registers of wage payments and overtime	Monthly
			Review of identification documentation of workers	At the time of contractor signing and renewal

KTZ team	Purpose of Monitoring	Aspects to be covered	Monitoring Mechanism	Timeline for Monitoring
		<ul style="list-style-type: none"> • Labour working conditions- especially labour camp monitoring • Child labour and forced labour issues • Other compliances against labour law • Access to grievance mechanism • Worker accommodation audits • Contractor safety training on ESMS & EHSS 	<ul style="list-style-type: none"> Visual reconnaissance of labour camp Discussion with Workers Discussion with Contractor Review of grievances (if any) Records and internal audits 	<ul style="list-style-type: none"> Weekly Monthly Monthly Monthly Monthly
Finance Team	<p>Ensure Contractor adherence to contract terms and conditions (excluding EHS and labour)</p> <p>Monitor timely completion of scope of work and invoicing</p>	<ul style="list-style-type: none"> • Compliance to general terms and conditions of contract • Compliance to timeline • Compliance to invoicing terms and conditions • Financial penalties for non-compliance with EHSS and CEMS • Budget for contractor safety & environmental training • Procurement & Supply Chain Compliance Audit • Review of Contractor Insurance Coverage for EHSS Risks 	<ul style="list-style-type: none"> • Visual reconnaissance • Discussion with KTZ teams involved • Documentation review Records & Internal Audits 	<p>In keeping with milestones identified in agreement</p> <p>Based on validity of documents submitted</p>