Cultural Heritage Management Plan

KVGGN SYNERGY PRIVATE LIMITED

REVISION HISTORY

Rev.	Date	Description	prepared	checked	approved
0	3/8/2023	Issued as per ISO 9001:2015, ISO 14001:2015 & ISO 45001-2018 requirements and IFC Principle Standards.	MR	MR	MD

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1. PURPOSE

The purpose of this document is to protect and preserve cultural heritage from any potential negative impacts associated with the construction and operation of the components of KVGGN SYNERGY PVT. LTD. and its Special Purpose Vehicles (SPVs) involved in the project. Its goal is to ensure the safeguarding of cultural heritage for future generations.

This document is an integral part of the QHSE Manual of KVGGN Synergy Pvt. Ltd., which includes a range of plans, guidelines, and procedures, such as this Cultural Heritage Management Plan. The plan outlines the specific requirements for managing cultural heritage and details the processes, procedures, and resources that KVGGN Project will utilize to ensure effective implementation and compliance. As a key component of the overall Project Health, Safety, Environment, and Community Management System, this plan will serve as the basis for audits conducted by both internal and external parties.

Furthermore, this document addresses the potential discovery of archaeological deposits during ground-disturbing activities within the project area. It establishes clear protocols to be followed in the event of an archaeological find, ensuring that any such sites are appropriately documented and protected in accordance with relevant regulations.

2. SCOPE

The procedure applies to all tangible cultural heritage found in the area of influence (including buffer zones) during the duration of KVGGN Synergy Pvt. Ltd and it's SPVs project.

Cultural heritage refers to

- Tangible forms of cultural heritage, such as tangible moveable or immovable objects, property, sites, structures, or groups of structures, having archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values;

- Unique natural features or tangible objects that embody cultural values, such as sacred groves, rocks, lakes, and waterfalls; and

- Certain instances of intangible forms of culture that are proposed to be used for commercial purposes, such as cultural knowledge, innovations, and practices of communities embodying traditional lifestyles**.**

3. RESPONSIBILITY AND AUTHORITY

The KVGGN Synergy QHSE team, in collaboration with the Business Development team, is responsible for notifying KVGGN Synergy's Project Approval Committee of any observed cultural heritage sites or components within the scope of work that may trigger the implementation of the Cultural Heritage Management Plan.

Additionally, the KVGGN Synergy QHSE team is responsible for ensuring that IFC Performance Standard 8 (PS 8) on Cultural Heritage is adequately addressed within the scope of the Environmental and Social Impact Assessment (ESIA).

The KVGGN Synergy QHSE team, in collaboration with the Project Management, Asset Management, and Procurement teams, will implement this procedure at the project site throughout the life of the project.

4. REFERENCE

QHSE Manual, KVGGN Synergy

ISO 9001:2015

ISO 14001:2015

ISO 45001:2018

IFC Principle Standards 8
IFC Principle Standard Guide Note 8, Cultural Heritage.

5. DEFINITIONS

Tangible cultural heritage	Tangible cultural heritage is considered a unique and often non-renewable resource that possesses cultural, scientific, spiritual, or religious value and includes moveable or immovable objects, sites, structures, groups of structures, natural features, or landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural value.

Critical Cultural Heritage	Critical cultural heritage consists of one or both of the following types of cultural heritage: (i) The internationally recognized heritage of communities who use, or have used within living memory the cultural heritage for long-standing cultural purposes; or (ii) Legally protected cultural heritage areas, including those proposed by host governments for such designation.
Archaeological Site	Concentrated and patterned physical remains of past human activity, particularly human settlement, constitute a site. Such a site may encompass artifacts, plant and animal remains, structural remnants, and soil features. It can range from a large, ancient city that is either fully or partially buried by surface soils or other sediments, to the ephemeral and superficial remnants of a temporary nomadic camp or other short-term activities.
Historic Structure	Also known as historic monuments, this category encompasses above-ground architectural features, such as houses, temples, marketplaces,

	and churches, that have reached a designated age or possess other characteristics—such as association with a significant event or person—that make them "historic" and therefore worthy of recognition as a heritage resource. Similar to archaeological sites, the significance of a historic structure can vary greatly depending on its age, type, and condition. Some historic structures may also have associated archaeological deposits, making them both historic structures and archaeological resources. A historic structure may either be abandoned or still in use.

Historic District	A **Historic District** is a contiguous collection of historic structures and associated landscape features that form a heritage resource spanning a larger area than any single structure. The key factors in defining and assessing the significance of a historic district are its integrity and thematic interest. Examples of historic districts may include temple precincts, graveyards, urban neighbourhoods, and sometimes entire villages or towns.
	Historic districts may also contain structures that are thematically unrelated or "non-contributing," which may or may not warrant protection on their own. While historic structures and districts generally require protection from direct physical impacts, they should also be considered in terms of their visual integrity. Construction that is visually discordant, whether within or near a historic district or structure, may necessitate special design measures to mitigate potential visual impacts to the heritage resources. .
Historic or Cultural Landscape	A **Historic Landscape** is an area where traditional land-use patterns have shaped and maintained landscape features that reflect a particular culture, way of life, or historical period, making it worthy of recognition as a heritage resource. A historic landscape may also include historic monuments and archaeological sites. The key factors for assessing the significance of this resource are its integrity and uniqueness.
	While a historic landscape may share certain characteristics with a historic district, it generally refers to a non-urban area with heritage value. This type of resource may also encompass culturally significant natural features, such as sacred lakes, forests, waterfalls, sacred trees, and similar elements.
Artifact	A portable object that is created by past human activity and becomes part of an archaeological site or isolated archaeological find. Most archaeological artifacts lose substantial cultural and scientific value when removed from their "context" in the ground. Archaeological artifacts, in context or not, are most often the property of the national government. Their scientific collection and use is controlled through a permitting process administered by national heritage authorities. National law and international treaty forbid the

	sale and export of archaeological artifacts. An object removed from a historic structure will have the same legal status as an archeological artifact.
Nonreplicable cultural heritage	May relate to the social, economic, cultural, environmental, and climatic conditions of past peoples, their evolving ecologies, adaptive strategies, and early forms of environmental management, where the (i) Cultural heritage is unique or relatively unique for the period it represents, or (ii) Cultural heritage is unique or relatively unique in linking several periods in the same site.
Replicable cultural heritage	Replicable cultural heritage is defined as tangible forms of cultural heritage that can themselves be moved to another location or that can be replaced by a similar structure or natural features to which the cultural values can be transferred by appropriate measures. Archeological or historical sites may be considered replicable where the particular eras and cultural values they represent are well represented by other sites and/or structures.

6. Procedure

6.1 Project Assessment Process

The screening phase of the risks and impacts identification process will identify the extent and complexity of potential cultural heritage risks and impacts in the project's area of influence. If the screening indicates potential adverse impacts, further analysis will be done to ascertain the nature and scale of these impacts and proposed mitigation measures. The breadth, depth, and type of analysis will be proportionate to the nature and scale of the proposed project's potential adverse impacts on cultural heritage resources.

The assessment will generally address potential adverse impacts to cultural heritage and, where possible, opportunities for its enhancement. In cases where cultural heritage is deemed a significant issue, a focused assessment will be carried out. Competent

professionals will be deployed to carry out such analysis as part of the assessment.

When in doubt about whether something is cultural heritage, KVGGN or its representative will seek the knowledge and advice of local and/or competent experts, government authorities, and members of local communities. The knowledge of local communities is particularly important for identifying cultural heritage that may be tied to the natural environment and not evident to outsiders.

Data collection and other assessment studies will be undertaken to avoid, minimize, and mitigate potential project impacts to cultural heritage resources.

For cultural heritage aspect and impact, the following groups may be relevant for consultation:

- Historical or traditional users and owners of cultural heritage
- Traditional communities embodying traditional lifestyles
- Ministries of archaeology, culture, or similar national or heritage institutions
- National and local museums, cultural institutes, and universities
- Civil society concerned with cultural heritage or historical preservation, areas of environmental or scientific interest; Affected Communities; and religious groups for whom the cultural heritage is traditionally sacred

6.1.1 Cultural Heritage Aspects of the Environmental and Social Impact Assessment process for projects with known or potential heritage issues,

The Environment and Social impact assessment will includes the following elements on best effort basis :

- A detailed description of the proposed project including its alternatives;

- Heritage baseline conditions in the project's area of influence;

- An analysis of project alternatives in relation to the baseline conditions to determine potential impacts; and

- Proposed impact mitigation measures, which may include avoidance or reduction of impacts by project design changes and/or the introduction of special construction and operational procedures, and compensatory mitigations such as data recovery and/or detailed study.

6.2 Protection of Cultural Heritage in Project Design and Execution

Sites containing cultural heritage will not be excavated or otherwise disturbed unnecessarily. If excavation in the course of the project cannot be avoided, competent cultural heritage professionals, local and/or international, will be identified and deployed to carry out excavations or other activities in accordance with internationally recognized practices**.**

KVGGN may undertake measures for the protection of already-disturbed cultural heritage within scope of its work, that are different from measures for the protection of untouched cultural heritage. Many types of cultural heritage cannot be put back once they have been disturbed, but they may still be valued.

6.3 Community Access

If KVGGN's project site contains cultural heritage or prevents access to previously accessible cultural heritage sites being used by, or that have been used by, affected communities within living memory for long-standing cultural purposes, KVGGN will, based on affected community consultations allow continued access to the cultural site or will provide an alternative access route, subject to overriding health, safety, and security considerations**.**

Where health, safety, or security is a consideration, alternatives to open access will be identified through community consultations. Alternatives may include alternative access routes, specifying dates and times when access will be provided, providing health and safety equipment and training for specified users of the site, or other measures that balance access with health, safety or security measures. The agreements with affected communities on access will be documented.

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6.4 Removal of Replicable Cultural Heritage

Where KVGGN encounters tangible cultural heritage that is replicable and not critical, KVGGN will apply mitigation measures that favor avoidance (minimize of eliminate adverse impact) Where avoidance is not feasible, KVGGN will implement restoration measures that aim to maintain its value and functionality.

If the minimization of impacts and/or restoration in situ are not feasible, KVGGN may consider restoring cultural heritage at an alternative location. KVGGN will apply a mitigation hierarchy as follows:

- **Minimize adverse impacts** and implement restoration measures in situ, ensuring the preservation of the value and functionality of the cultural heritage, including the maintenance or restoration of any ecosystem processes necessary to support it.
- **If in situ restoration is not possible**, restore the functionality of the cultural heritage at a different location, including the ecosystem processes required to support it.
- The **permanent removal of historical and archaeological artifacts and structures** will be carried out based on the advice of local and/or competent experts, government authorities, and community members. Competent cultural heritage professionals, both local and/or international, will be identified and engaged to oversee the removal and restoration process.
- **Only when minimization of adverse impacts** and restoration to maintain the value and functionality of the cultural heritage are demonstrably unfeasible, and where the affected communities rely on the tangible cultural heritage for long-standing cultural purposes, will compensation for the loss of that cultural heritage be considered.

6.5   Removal of Non-Replicable Cultural Heritage

Non-replicable cultural heritage is most effectively protected through preservation in place, as removal would result in irreparable damage or destruction. Examples of non-replicable cultural heritage include an ancient city, temple, or a site that is unique to the historical period it represents.

KVGGN will not remove any non-replicable cultural heritage unless all of the following conditions are met:

- **No technically or financially feasible alternatives** to removal exist;
- The **overall benefits of the project** clearly outweigh the anticipated loss of cultural heritage due to removal;
- Any removal of cultural heritage is conducted using **the best available techniques**.

Therefore, projects should be designed to avoid any damage to cultural heritage through removal or project-related activities, such as construction. In cases where avoidance is not feasible, no alternatives to removal are available, and the project benefits outweigh the cultural heritage loss, KVGGN may proceed with the removal and preservation of the cultural heritage using the best available techniques.

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6.6 Critical Cultural Heritage

KVGGN shall not remove, significantly alter, or damage critical cultural heritage. In exceptional circumstances where impacts on critical cultural heritage are unavoidable, KVGGN will implement a process of informed consultation and active participation of the Affected Communities, as outlined in the "Management Plan for Grievance Redressal, Stakeholder Engagement & Consultation." This process will utilize a good faith negotiation approach, which will result in a documented outcome.

Good faith negotiation generally involves the following for each party:

(i) Willingness to engage in the process and availability to meet at reasonable times and frequencies, in ways that are acceptable to all parties;

(ii) Provision of necessary information for informed negotiation;

(iii) Exploration of key issues of importance; and

(iv) Willingness to adjust initial positions and modify offers where possible.

KVGGN will retain external experts to assist in the assessment and protection of critical cultural heritage.

KVGGN will document the mutually accepted process between the client and the Affected Communities, as well as the evidence of agreement between the parties resulting from the negotiations. This will require the approval of the culturally appropriate decision-making body within the affected community. The appropriate decision-making body will be identified through a social analysis conducted by an external expert. This body must be recognized by the majority as both their legitimate representative and as capable of entering into a valid agreement.

Agreement does not necessarily require unanimity and can be achieved even if individuals or sub-groups explicitly disagree. The benefits derived from the agreement will be shared with all members of the Affected Communities, regardless of whether they supported the project.

Legally protected cultural heritage areas play a crucial role in the protection and conservation of cultural heritage, and additional measures are necessary for any projects permitted under applicable national law within these areas. When a proposed project is located within a legally protected area or a legally defined buffer zone, KVGGN will, in addition to the requirements for critical cultural heritage as outlined above, adhere to the following requirements:

- **Comply** with national or local cultural heritage regulations, or the management plans for the protected area;
- **Consult** with the sponsors and managers of the protected area, local communities, and other key stakeholders regarding the proposed project;
- **Implement** additional programs, as necessary, to support and enhance the conservation objectives of the protected area.

6.7 Chance find procedure.

The following procedural guidelines must be followed if previously unknown heritage resources are exposed or discovered during the course of the project:

If you believe you have encountered any archaeological materials, stop work in the area immediately and follow the procedure outlined below:

- **Cease all construction activity** in the vicinity of the remains.
- **Record the find location**, and ensure that all remains are left in place.
- **Contact the Project Manager** and the Archaeological Survey of India.
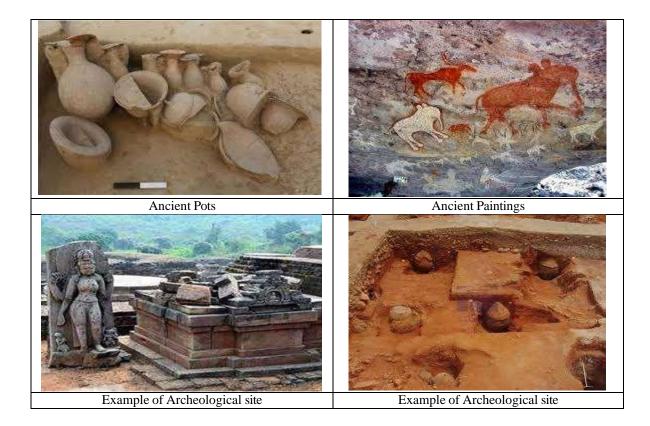
- **Assess the potential significance** of the remains and identify potential mitigative options.
- If the significance of the remains is deemed sufficient to warrant further action and they cannot be avoided, the Project Manager, in consultation with the Archaeological Survey of India and other relevant stakeholders, will determine the appropriate course of action.
- In the case of **human remains**, if they are assessed to be archaeological, the Archaeology Branch and local regulators will be consulted to determine the appropriate handling procedure. Options may include avoidance or respectful removal and reburial. The appropriate local government and/or police will also be notified of the find.

If human remains are encountered and they are not archaeological, **contact the local police immediately**.
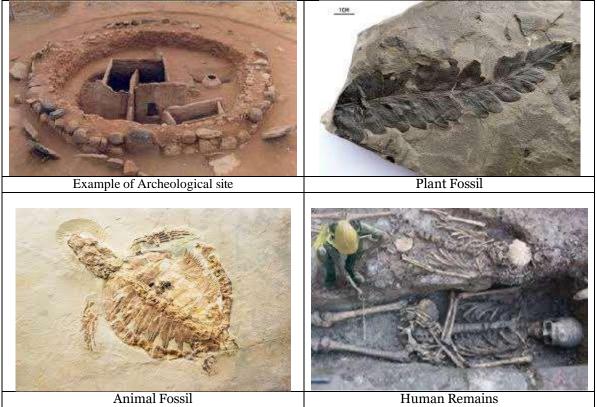
- If the significance of the remains is deemed sufficient to warrant further action and they cannot be avoided, the Project Manager, in consultation with the Archaeology Branch, local regulators, and other relevant stakeholders, will determine the appropriate course of action.

Examples of previously unknown heritage resources that may be exposed or found during the course of the project include:

(Here, specific examples should be added based on the nature of the project or the region.)

Ancient Pots	Ancient Paintings
Example of Archeological site	Example of Archeological site

Example of Archeological site

Plant Fossil

Animal Fossil

Human Remains

7. DOCUMENTATION

The **aspects and impacts** of cultural heritage, in accordance with IFC Performance Standard 8 (PS 8), shall be documented in both the **Environmental and Social Impact Assessment (ESIA) report** and the **KVGGN Report** (E&S Screening Checklist for Greenfield, Brownfield, and Under-development Solar and Wind Power Projects).

Any **previously unknown heritage** exposed or discovered during the project's lifetime shall be duly recorded in the **KVGGN Report**.