



Vedanta Resources Plc

Sustainability Governance System

Technical Standard Indigenous Peoples / Vulnerable Tribal Groups



Standard Title:	Indigenous Peoples / Vulnerable Tribal Groups	Date of Revision	22-03-2013
Standard:	VED/CORP/SUST/TS 22	Revision:	V.2

Document Issue and Revision History		
DATE	REVISION NUMBER	CHANGE SUMMARY
07/03/2013	v.1	Initial Issue
22/03/2013	v.2	Deletion of duplicate definitions and minor typographical corrections.

Authorised by:	Tony Henshaw
Signature	And
Position:	Chief Sustainability Officer

Confidentiality

This document and its contents are the copyright property of Vedanta Resources Plc. The release of this document to any third party outside of Vedanta is strictly prohibited without prior consent.



Cor	tents		Page
1.	INT	RODUCTION	4
2.	SCO	PE	4
3.	DEF	INITIONS	5
4.	PRO	GRAMME REQUIREMENTS	8
	4.1	OBJECTIVES	8
	4.2	GENERAL REQUIREMENTS	9
	4.3	STAKEHOLDER ENGAGEMENT	10
	4.4	RISK ASSESSMENT (OR PROJECT CONCEPT)	10
	4.5	EXPLORATION	10
	4.6	FEASIBILITY/PROJECT DESIGN	12
		4.6.1 ESIA - Scoping Exercise	12
		4.6.2 ESIA - Indigenous Peoples / Vulnerable Tribal Group Consent & Participation	12
		4.6.3 ESIA - Baseline Data Collection	13
		4.6.4 ESIA - Assessing Impacts	13
		4.6.5 ESIA - Indigenous Peoples / Vulnerable Tribal Group Development Plan	13
		4.6.6 ESIA - Disclosure	13
	4.7	CONSTRUCTION/OPERATION	13
	4.8	CLOSURE	14
5.	ROL	ES AND RESPONSIBILITIES	14
	5.1	VEDANTA RESPONSIBILITIES WHERE GOVERNMENT IS RESPONSIBLE FOR MANAGING IP / VTG ISSUES	14
6.	CON	IPLIANCE AND PERFORMANCE	15
7.	SUP	PORTING INFORMATION	15
8.	REV	TEW	16
۵	DELATED DOCUMENTATION 16		



1. INTRODUCTION

The purpose of this Technical Standard is to establish the programme design, risk management controls and supporting information, needed to avoid, reduce, and in some cases compensate for adverse Project impacts upon marginalized and Vulnerable Tribal Groups or similar disadvantaged Groups, sometimes referred to as 'Indigenous Peoples' (IPs).

2. SCOPE

The guidance in this Technical Standard applies to all new Vedanta Greenfield Projects where communities of Indigenous Peoples or Vulnerable Tribal Groups are known or suspected to be present within the area of influence. The applicability of this Technical Standard is established during the environmental and social risks and impacts identification process (see TS 8 -Conducting ESIA to International Standards and GN 16 Conducting Environmental and Social Impact Assessments).

This Technical Standard is applicable to the entire operation lifecycle (including exploration and planning, evaluation, construction, operation and closure). It does not apply to existing operations unless a Brownfield project is likely to result in adverse impacts to Indigenous Peoples or Vulnerable Tribal Groups.

Determining application of this Standard requires diligent research and the exercise of measured judgement in a robust screening process to confirm Indigenous People or Vulnerable Tribal Group status. If eligible, Vulnerable Tribal Groups or Indigenous Peoples may have additional rights that are recognized internationally even if National Legislations makes no separate provisions for them. Accordingly, Vedanta will implement this Technical Standard to confirm the status of any affected Vulnerable Tribal Groups or Indigenous Peoples for the applicability of this Standard, and as appropriate to put in place the necessary controls and measures required to achieve compliance with host country Laws and consistency with IFC requirements.

Vedanta Resources recognises that our projects can also create opportunities for Indigenous Peoples / Vulnerable Tribal Groups to participate in, and benefit from project-related activities that may help them fulfil their aspiration for economic and social development. Furthermore, they may play a role in sustainable development by promoting and managing activities and enterprises as partners in development. Government often plays a central role in the management of issues relating to such groups, and we will collaborate with the responsible authorities in managing the risks and impacts of their activities.

Document: VED/CORP/SUST/TS 22

Page 4 of 16



3. **DEFINITIONS**

Definitions of key terms used in this document are shown in the following table.

Term	Definition	
Vulnerable Tribal Groups (VTG) / Indigenous Peoples (IP)		
	Vulnerable Tribal Groups or 'VTGs' is the preferred terminology for this Technical Standard and covers IPs unless otherwise stated.	
Vulnerable Tribal	VTGs may be referred to in different countries by such terms as "Indigenous Peoples" "Aboriginals" "Vulnerable Primitive Tribal Groups" or "Indigenous Ethnic Minorities". They are generally considered to be most marginalized and vulnerable segment of population and they may be more vulnerable to impacts associated with Project development. Their inability to defend their rights to, and interest in lands and natural & cultural resources may also impact their social and cultural life. Their peculiar circumstances may require special protective measures in the event that they are adversely impacted by a project.	
Groups (VTG)	The definition of VTGs may be specified in the laws of host country on this subject. The IFC's criteria for IPs are included in paragraph 5 of PS 7 and are shown below.	
	There may be significant differences in the respective definitions and approaches to managing VTG / IP issues; the IFC requirements are frequently more stringent.	
	Competent professionals can be useful resources to assist in the determination of VTG / IP status, ensuring the application of definitions by authorities in the country of operation, and/or in applying the IFC definition.	
	IFC defines Indigenous Peoples as "a distinct social and cultural group possessing the following characteristics in varying degrees:	
	(i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;	
Indigenous Peoples	 (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories; 	
(IP)	(iii) customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture; or	
	(iv) a distinct language or dialect, often different from the official language or languages of the country or region in which they reside".	



Term	Definition	
Informed Consultation and Participation (ICP) / Free Prior and Informed Consent (FPIC)		
Informed Consultation and Participation (ICP)	Informed Consultation and Participation involves an in-depth exchange of views and information, and an organized and iterative consultation between the client and IP / VTG community likely to be affected by the project, leading to the Company's incorporating into their decision-making process views of the IP /VTG on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues. It is an integral part of gaining FPIC	
	There is no universally accepted definition of FPIC and it only applies to bona fide Indigenous Peoples in the 'special circumstances' described below and in clauses 13-17 of IFC PS 7 where there are:	
	Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use	
	2) Relocation of Indigenous Peoples from Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use	
	Where significant project impacts on critical cultural heritage are unavoidable	
Free Prior and Informed Consent (FPIC)	For the purposes of this Technical Standard, FPIC builds on and expands the process of informed consultation and participation (ICP) and will be established through good faith negotiation (GFN) between the project and the Indigenous Peoples. FPIC is both a process and an outcome; the process builds upon ICP and requires GFN.	
	A project must also document (i) the mutually accepted process between the client and Affected Communities of Indigenous Peoples, and (ii) evidence of agreement between the parties as the outcome of the negotiations. FPIC does not necessarily require unanimity and may be achieved even when some individuals or groups within the community explicitly disagree (i.e. evidence of 'BCS' may be sufficient). FPIC should be viewed as a process that both allows and facilitates Affected Communities of Indigenous Peoples to build and agree upon a collective position otherwise known as collective community consent.	



	Oth on Definitions		
	Other Definitions		
Affected Communities	Local communities directly affected by the new or existing project.		
Broad Community Support (BCS)	Broad Community Support is a collection of expressions by Affected Communities, through individuals or their recognized representatives, mostly from customary or political representatives such as local councils in support of the proposed business activity. BCS also applies to programs involving bona fide Indigenous Peoples / Vulnerable Tribal Groups and there may be BCS even if some individuals or groups object to the business activity. As a collection of expressions, BCS is achieved by a number of activities across the range of a project's overall stakeholder engagement. The presence of BCS can be indicated by formal negotiated agreements or through Public Hearing as mandated by the host country laws, but also through suitable indicators of ongoing and continued constructive participation of the Affected Communities in project-related dialogue and programs.		
Commitment Register	A management tool used to document, track, and manage the commitments made with affected stakeholders		
Critical Cultural Heritage	Consists of (i) internationally recognized heritage of communities who use, or have used within living memory such cultural heritage for long-standing cultural purposes (such as World Heritage Sites); and (ii) legally protected cultural heritage areas as per the legal framework of the host country.		
Ecosystem Services	The benefits that people, including businesses, derive from ecosystems. Ecosystem services are organized into four types of services: (i) provisioning services, which are the products people obtain from ecosystems; (ii) regulating services, which are the benefits people obtain from the regulation of ecosystem processes; (iii) cultural services, which are the nonmaterial benefits people obtain from ecosystems; and (iv) supporting services, which are the natural processes that maintain the other services (IFC Performance Standard Guidance Note 6).		
Good Faith Negotiation (GFN)	Good faith negotiation generally involves for each party: (i) willingness to engage in a process and availability to meet at reasonable times and frequency in ways acceptable to all parties; (ii) provision of information necessary for informed negotiation; (iii) exploration of key issues of importance; and (iv) willingness to change initial position and modify offers where possible.		
Grievance	A legitimate concern, complaint or feedback raised by any stakeholder either affected or interested in company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations.		
IFC (International Finance Corporation)	Member of the World Bank that finances and provides advice to private sector ventures and projects in developing countries.		



	,
Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use	Lands and natural resources (eco-system services) that are used, occupied by, or traditionally owned by Communities of IP/ VTG. This may also include lands in some countries for which these IP / VTG may not have formal title but use of which can often be substantiated and documented.
Lifecycle	The phases of a project including exploration and planning, evaluation, operation and closure.
Operation(s)	A location or activity that is operated by a Vedanta Company and is part of the Vedanta Group. Locations could include mines, refineries, ports or transportation activities, wind farms, oil and gas development sites, offices including corporate head offices and research and development facilities.
Receptor	An entity that may be subject to either adverse or positive impact arising from the project. In the context of this document the receptor may be either environmental or social in nature.
Stakeholder	Persons or groups that are directly or indirectly affected by a project. This can refer to shareholders, lenders, employees, communities, industry and governments.
Stakeholder engagement	An umbrella term encompassing a range of activities and interactions between Vedanta and stakeholders over the life of a project that is designed to promote transparent, accountable, positive, and mutually beneficial working relationships. Stakeholder engagement includes stakeholder identification and analysis, information disclosure, communication, problem/conflict anticipation and prevention, ongoing consultation, formation of partnerships, construction of grievance resolution mechanisms, negotiated problem solving, employee involvement in project monitoring, regular reporting forums and procedures, and other related management activities.
Vedanta Company	A subsidiary of Vedanta Resources plc either fully or majority owned that has its own management structure (e.g. Hindustan Zinc Limited, Vedanta Aluminium Limited, Sterlite Industries limited, etc.)

4. PROGRAMME REQUIREMENTS

All Vedanta subsidiary companies and operations are required to follow the requirements listed below with regards to the mechanisms for identifying Affected Communities of Indigenous Peoples / Vulnerable Tribal Groups within the Area of influence that may be impacted by a proposed Vedanta activity or operations and potential or actual impacts of Vedanta operations on these communities.

4.1 Objectives

a. To ensure that the development process fosters full respect for the dignity, human rights, aspirations, cultures and natural resource-based livelihoods of such IP / VTGs



- b. To avoid adverse impacts of projects on such IP / VTGs, or when avoidance is not feasible, to minimize, mitigate, or compensate for such impacts, and to provide opportunities for development benefits, in a culturally appropriate manner.
- c. To establish and maintain an ongoing relationship with such communities of affected IP / VTGs
- d. To foster good faith negotiations and informed participation of IP / VTGs when projects are to be located on traditional or customary lands under use by such communities
- e. To respect and preserve the culture, knowledge and practices of IP / VTGs

4.2 General Requirements

- a. Vedanta will strive at every stage from project screening through to execution to avoid potential adverse impacts from its activities upon Affected Communities and eligible IP / VTGs.
- b. Vedanta will apply a fair and legitimate process to identify their rights under law. Where it is confirmed that there are IP / VTGs within an area of influence. Vedanta will identify the nature and degree of the expected direct and indirect economic, social, cultural and environmental impacts upon them at all stages of the project lifecycle.
- c. Vedanta will identify all formal permitting and land use requirements that may exist and will ensure that all necessary arrangements are put in place to obtain and to ensure compliance with such requirements (see TS 03 Land Resettlement Management). Where formal permitting and land use requirements are not specified or are unclear with regard to lands and territories occupied or used by IP / VTGs, project / operation manager are advised to undertake and document formal processes and instances of areas of mutual agreement.
- d. All Vedanta operations shall engage and consult with IP / VTGs in a culturally appropriate manner that is planned and managed in accordance with the TS 05 Stakeholder Engagement Technical Standard.
- e. Training is to be provided for those Vedanta employees involved in dealing with issues related to IP/VTGs to enable them to execute their duties and manage their obligations in a manner consistent with this technical standard and as identified by, and in line with, the Vedanta Technical Standard TS 05 Competency, Training and Awareness. This shall include consideration of the requirements of the Vedanta policy on Stakeholder Engagement (see TS 05 Stakeholder Engagement Technical Standard) and in addition the project will provide context specific cultural awareness training dependent on the level of exposure to IP / VTGs and responsibilities of employees.
- Those Vedanta Companies with Affected Communities of IP/VTG will incorporate opportunities for participation in stakeholder engagement and promote sustainable benefits for IP / VTGs in accordance with the TS 19 Community Investment Management.



4.3 Stakeholder Engagement

All stakeholder engagement throughout the project life cycle with IP / VTGs will be planned and managed in accordance with TS05 Stakeholder Engagement Technical Standard in a culturally appropriate manner with IP / VTGs themselves and / or their legitimate representatives

4.4 Risk Assessment (or Project Concept)

- a) It is good practice to identify as early as possible any potential IP / VTGs and where possible to identify any potential risks and constraints to the project. The process for identifying all stakeholders is outlined in TS 05 Stakeholder Engagement and the identification process will meet the screening requirements as set out in the Vedanta Management Standard MS03 New Projects, Planning Processes and Site Closure, Management Standard MS08 Acquisitions, Divestment and Joint Venture due Diligence and the Technical Standard TS08 Conducting ESIAs to International Standards.
- The Project should have a comprehensive understanding of Host Country laws applicable to the VTGs, including land tenure and other rights.
- The project will undertake an initial screening (use checklist in TS 8) to determine whether there are any potential IP / VTG and confirming their IP / VTG status.
- If it is suspected or confirmed that IP / VTGs are present, the project manager is to inform the Chief Executive Officer (CEO) or other delegated authority and make detailed verification checks, including consultation with stakeholders, appropriate experts and relevant authorities. The Chief Executive Officer (CEO) or other delegated authority will review the findings of the determination process and request clarification or further research as necessary.
 - i. In the event of positive determination, IP / VTGs will be treated in accordance with host country law and this Technical Standard - including the FPIC principle where no regulatory consultative process exists for such a group and the special circumstances outlined herein are confirmed.
 - ii. If however the affected community is not considered to satisfy the IP / VTG definition / criteria, the affected community will still be eligible for project benefits in line with the benefits granted to other affect project communities.
- Should a decision with regard to risk assessment be disputed by any project affected community, Vedanta will offer to review the decision and may choose to take expert guidance including the involvement of government agencies as may be required.

4.5 Exploration

- a) All activities concerning permitting land use will be conducted in accordance with TS 03 Land Resettlement Management.
- b) While engagements with the local communities through various platforms of deliberations will be held by Vedanta to determine customary ownership and deliberate on other such critical issues, access to land for mining or industrial projects will be resolved in accordance with the prevailing regulations for mining and exploration in the host country and as per the land acquisition mechanism respectively.
- c) Project managers are required to obtain evidence of consultation exercises / FPIC to have been conducted with the IP / VTGs during exploration if those activities include:



- Impacts on Lands and Natural Resources subject to Traditional Ownership or Under i. Customary Use (see TS 03 Land and Resettlement Management);
- Inability to avoid through Project design, any relocation of IP / VTGs from Lands and Natural Resources subject to Traditional Ownership or Under Customary Use (see TS Land and Resettlement Management); and
- Any unavoidable project impacts on Critical Cultural Heritage that are essential to the iii. identity and/or cultural, ceremonial, or spiritual aspects of IP / VTGs (see TS 01 Cultural Heritage for further details).

Evidence that ICP/ FPIC has been followed requires documentation such as i) mutually accepted engagement and negotiation process (such as a stakeholder engagement strategy) between the Vedanta and IP / VTGs, ii) evidence of agreement between the parties regarding the outcome of the negotiation and iii) Photographs and video footage of such consultation exercises, as appropriate. This may be in the form of a signed memorandum of understanding, approved meeting notes, or other documented evidence of agreement. Key documents normally prepared as part of ICP/ FPIC often include:

- A framework document containing the principles of engagement, project design and implementation process as it relates to the communities, and principles for obtaining ICP/FPIC.
- A IP / VTG Development Plan, or similar action plan that includes baseline information; analysis of impacts, risks and opportunities (from the ESIA); results of consultation and future engagement plans; mitigation and enhancement plans; community-based natural resource management; a grievance mechanism; schedule, roles and responsibilities and allocation of resources; and monitoring and evaluation procedures.
- An ICP/ FPIC agreement or document reflecting the mutual consent to the process and proposed actions.

ICP/ FPIC does not require unanimous support from all members of IP / VTGs; rather, an ICP/ FPIC agreement captures the IP / VTGs' broad community support or agreement on the legitimacy of the engagement process and the decisions made. Stakeholder mapping exercises and engagement within the IP / VTGs should be used to determine appropriate representatives for negotiation, support and agreement, as this will vary between communities and groups. This process should be presented as part of ICP/ FPIC documentation.

- d) The nature and frequency of employee engagement with IP / VTGs during exploration will vary from project to project. All engagement will be planned and managed in accordance with TS05 Stakeholder Engagement Technical Standard.
- e) Interactions will be documented (see TS 05 Stakeholder Engagement) for continuity (to allow for rotation or turnover of key staff) and for the protection and satisfaction of both the community and the company.
- f) A Grievance mechanism will be established as early as possible in the project cycle (as per TS 04 Grievance Mechanisms and TS05 Stakeholder Engagement).
- g) A commitment register will be established as early as possible to ensure all commitments made by Vedanta are recorded and fulfilled.



4.6 Feasibility/Project Design

- a) A full ESIA will be undertaken after confirmation that the project is viable (see TS 08 Conducting ESIA to International Standards).
- b) The scope of the assessment will depend on the nature and scale of the project. The steps in the ESIA process as they relate to IP / VTGs are outlined in the following sections.

4.6.1 ESIA - Scoping Exercise

- a) A scoping exercise will be undertaken for all new potential projects (see TS 08 Conducting ESIA to International Standards).
- b) During the scoping exercise the external expert(s) who will undertake the ESIA will ensure the following:
 - Confirm the status where possible of all potentially impacted IP / VTGs within the project's defined area of influence. The process will build upon information obtained from previous investigations (such as human rights due diligence) and is further outlined in TS 05 Stakeholder Engagement;
 - Identify potential significant impacts of the project upon those IP / VTGs that will require further investigation and assessment; and
 - Suggest means whereby the project can achieve the ICP /FPIC, as applicable of those potentially impacted IP /VTGs and appropriate mitigation strategies

4.6.2 ESIA - Indigenous Peoples / Vulnerable Tribal Group Consent & Participation

For projects with significant adverse impacts to IP / VTGs, the project is required to engage them in a process of Informed Consultation and Participation (ICP) and in certain circumstances the project is required to obtain their FPIC (i.e. where triggered by any of the situations listed in 4.5 c) i / ii / iii above).

- a) The project will undertake an engagement process with the IP / VTGs while undertaking an ESIA process (See TS 05 Stakeholder Engagement).
- b) All specialists used in the ESIA process associated with IP / VTGs must be suitably qualified and experienced.
- c) The ICP process will quantify the degree of likely Broad Community Support and/or opposition to the proposed project. The process should be documented and should address any relevant gender issues amongst those people. The IP / VTGs will be informed about how their concerns will be dealt with during the project.

In all other instances where IP / VTGs may experience impacts, the project is expected to achieve and maintain Broad Community Support (BCS). BCS is a collection of expressions by Affected Communities including IP / VTGs in support of the proposed business activity; and can be indicated by dialogue or negotiated agreements, but also through ongoing and continued constructive participation of the IP / VTGs in project-related dialogue and programs. The Project will need to maintain documentation/ records of community engagement, leading to broad community support for the project within the IP / VTGs.

Document: VED/CORP/SUST/TS 22 Version V.2



4.6.3 **ESIA - Baseline Data Collection**

- This is the stage at which baseline data is collected on current (i.e. pre-development) a) environmental and social conditions. Where IP / VTGs have been identified as potential Receptors to project activities, additional data collection as required will be undertaken.
- Consultations with IP / VTG to collect baseline data will be planned and managed in b) accordance with TS05 Stakeholder Engagement Technical Standard.
- The final product will include the requirements outlined in TS 08 Conducting ESIA to c) International Standards.

4.6.4 **ESIA - Assessing Impacts**

The risks and impacts identification process for IP / VTGs will adopt the same form as that for the overarching ESIA process (see TS 08 Conducting ESIAs to International Standards).

ESIA - Indigenous Peoples / Vulnerable Tribal Group Development Plan 4.6.5

- Where alternatives have been explored and adverse impacts to IP / VTGs are unavoidable, the a) project will minimize, restore, and/or compensate for these impacts as required. The proposed actions will be developed with the ICP of the IP / VTGs and contained in a time-bound IP / Vulnerable Tribal group Development Plan (IP / VTGDP)
- An IP / VTGDP will detail the impact management arrangements (where impact cannot be b) avoided), an action plan for implementing the mitigation and management arrangements and any necessary monitoring requirements.
- c) The IP / VTGDP will detail arrangements for the periodic internal and external reporting (as required) of the impact management activities.
- d) Execution of the IPDP / VTG DP and the development of additional sub-plans and procedures will be a project commitment of Vedanta and its contractors.
- The plan will be a project specific and practical document that forms the basic guidance for e) implementing this Technical Standard in the context of a particular project or operational unit that is owned or operated by Vedanta.

4.6.6 **ESIA - Disclosure**

- The information gathered during each stage of the assessment as well as the IPDP / VTGDP a) can be directly included in the ESIA and any related assessments or can be captured in a standalone report that is appended to the ESIA disclosure report.
- b) Reporting considerations included in TS08 Conducting ESIA to International Standards will be referred to.

4.7 Construction/Operation

Vedanta will create, implement and maintain arrangements to keep the IP / VTGDP updated and adjusted as the Project progresses, to ensure the following:



- That effective and meaningful engagement with such groups throughout the lifetime of the Project;
- Identified impacts are monitored;
- Any additional impacts resulting from the implementation of the IP / VTGDP are observed and managed;
- Compliance with relevant standards is maintained; and
- The effectiveness of management and mitigation measures are confirmed/and or reviewed to ensure improvements to Project design and execution.

4.8 Closure

All planning and management of closure activities will be undertaken according to the Vedanta Technical Standard TS17 Site Closure with a view to minimising any post decommissioning / residual impacts on IP / VTGs.

5. ROLES AND RESPONSIBILITIES

Vedanta Resources, subsidiaries, businesses, operations and sites will ensure that roles and responsibilities for implementing and complying with this Standard are allocated. Key responsibilities will be included in job descriptions, procedures and/or other appropriate documentation.

5.1 Vedanta Responsibilities where Government is responsible for managing IP / VTG issues

In some jurisdictions/ Host Countries, the Government has statutory responsibilities for the identification, consultation and management of IP / VTG issues. Where this applies, Vedanta will collaborate, support and participate in the Government Programmes in order to achieve the goals of this Technical Standard. This may involve capacity building or training with Government Agencies, making Project Information available in a suitable format, offering practical assistance with logistics and consultation processes, and monitoring outcomes.

Where Host Country legislations potentially do not meet the requirements of this Technical Standard or the IFC Performance Standard 7, Vedanta will undertake a gap analysis to identify any issues that may require an intervention by Vedanta to achieve outcomes that are consistent with the objectives of this technical standard.

The Project Manager will endeavour to document the Government-managed Programmes and the entitlements of the IP / VTGs and the measures needed to bridge any gaps identified in 5.2. Where feasible, continuing Government participation in these further actions will be encouraged

5.2 Non-captive mines

Where feed stock is acquired from any non-captive mines, Vedanta will seek reasonable assurances on environmental and / or social performance from the operator(s) in accordance with TS6 (Supplier and Contractor Management). The ability of Vedanta to address these risks will depend upon the level of management control or influence over its primary suppliers.

Document: VED/CORP/SUST/TS 22

Page 14 of 16



6. COMPLIANCE AND PERFORMANCE

Each operation will ensure they comply with the requirements of this Standard. Performance against meeting the requirements of this Standard will be periodically assessed, documented and, where required, reported to Vedanta Group. The evaluation of performance will include:

- All new projects that have any IP / VTGs within their area of influence and details of how they may be affected.
- An assessment of significant impacts to IP / VTGs (where such status has been confirmed)
 has been undertaken.
- Evidence of the adoption of the mitigation hierarchy is available to support the proposed impacts management arrangements.
- The process of information disclosure, consultation and informed participation undertaken during the assessment is described within the documentation. Where FPIC is applicable, the assessment documentation describes the resolution of issues, Negotiation Process and any documented agreements that provide evidence of FPIC.
- An IP / VTG Development Plan is developed and implemented for all projects where significant adverse impacts to Affected Communities of Indigenous people are unavoidable.
- All management and monitoring arrangements are actively maintained and implemented and documentary evidence kept to confirm ongoing effectiveness of arrangements to manage IP / VTG issues.

7. SUPPORTING INFORMATION

Reference	Description
ICMM (International Council of Mining and Metals) Good Practice Guide: Indigenous Peoples and Mining	This Guide aims to assist companies in achieving constructive relationships with Indigenous Peoples. The Guide highlights good practice principles, discusses the challenges in applying these principles at the operational level and provides realworld examples of how mining projects have addressed these challenges.
International Finance Corporation Performance Standards (including PS7 Indigenous Peoples) and Guidance Notes	The IFC has published a Performance Standard (PS07) on Indigenous Peoples that set out IFC requirements in relation to this subject. The Guidance Notes direct the implementation of the full range of performance standards including PS07. These are available on the website. The guidance has been updated and revised versions are now available. http://www.ifc.org/ifcext/sustainability.nsf/Content/PerformanceStandards

Document: VED/CORP/SUST/TS 22 Version V.2



8. REVIEW

This Technical Standard will be periodically audited and reviewed to determine its accuracy and relevance with regard to legislation, education, training and technological changes. In all other circumstances, it will be reviewed no later than 12 months since the previous review.

9. RELATED DOCUMENTATION

A summary of the references and supporting documents relevant to this document is provided in the following table.

Doc. Ref.	Document name
	Vedanta Code of Conduct
MS 03	Competency, Training and Awareness
MS 06	New Projects, Planning Processes and Site Closure
MS 08	Acquisitions, Divestment and Joint Venture Due Diligence
TS 01	Cultural Heritage
TS 03	Land and Resettlement Management
TS 04	Grievance Mechanisms
TS 05	Stakeholder Engagement
TS 06	Supplier and Contractor Management
TS 08	Conducting ESIAs to International Standards