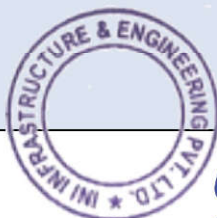


**Project
RoU Verification
Report**

COVER PAGE	
RoU Project Verification Report Form (VR)	
BASIC INFORMATION	
Name of approved UWR Project Verifier / Reference No.	INI Infrastructure & Engineering Private Limited
Type of Accreditation	<input checked="" type="checkbox"/> RoU Accreditation UWR <input type="checkbox"/> Water Audit/Water Footprint Expertise
	<ul style="list-style-type: none"> RoU Scope 2: Measures for conservation and storage of excess surface water for future requirements and conservation of freshwater related ecosystems and wetland protection. RoU Scope 5: Conservation measures are taken to recycle and reuse water, spend wash, wastewater etc. across or within specific industrial processes and systems.
Validity of UWR approval of Verifier	20/02/2024 onwards
Completion date of this VR	26/05/2025
Title of the project activity	Surface water storage and reuse of recycled sewage wastewater at Kensville golf and country club, Ahmedabad District, Gujarat, India
Project reference no.	UCR ID NO. 483
Name of Entity requesting verification service	Millenniumpark Holdings Pvt. Ltd.

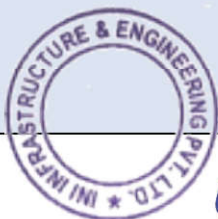


Contact details of the representative of the Entity, requesting verification service	Mr. Sameer Sinha Email - samsinha@savvygroup.in Contact No. - +91 8980410969 Millenniumpark Holdings Pvt. Ltd.
Country where project is located	India
Applied reference documents used for estimation	<ul style="list-style-type: none"> • PCNMR • UWR Rainwater Standard Version 6.1 • UWR Rainwater Offset Unit Verification Standard • UWR Verification Template 2022 • UWR Terms and conditions • Rainfall Data, Indian Meteorological Department • Rainwater Harvesting and Key Manual, 2019 • National Building Code of India 2016 • IGBC Green New Building Rating System, Version 3.0 • Central Ground Water Authority Guidelines, Government of India
Project Verification Criteria: Mandatory requirements to be assessed	<input checked="" type="checkbox"/> UWR Standard <input checked="" type="checkbox"/> Applicable Approved Calculations <input checked="" type="checkbox"/> Applicable Legal requirements /rules of host country <input checked="" type="checkbox"/> Eligibility of the Project Type <input checked="" type="checkbox"/> Start date of the Project activity <input checked="" type="checkbox"/> Meet applicability conditions in the applied methodology <input checked="" type="checkbox"/> Credible Water Data Sets <input checked="" type="checkbox"/> Do No Harm Observations <input checked="" type="checkbox"/> RoU calculations



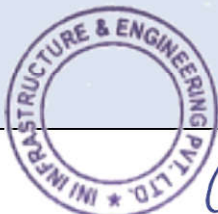
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	<p>Verification</p> <p><input checked="" type="checkbox"/> PCNMR</p> <p><input checked="" type="checkbox"/> No Double Counting</p> <p><input type="checkbox"/> Others (please mention below)</p> <p><input checked="" type="checkbox"/> Physical Site Visit and Observations</p> <p><input checked="" type="checkbox"/> STP Work Order and Self Declaration</p> <p><input checked="" type="checkbox"/> PP Legal agreement with STP operator</p> <p><input checked="" type="checkbox"/> STP Commissioning</p>
<p>Project Verification Criteria:</p> <p>Optional requirements to be assessed</p>	<p><input checked="" type="checkbox"/> Environmental Safeguards Standard and do-no-harm criteria</p> <p><input checked="" type="checkbox"/> Social Safeguards Standard do-no-harm criteria</p> <p><input checked="" type="checkbox"/> Bathymetric Survey Drawings and calculation Sheets</p> <p><input checked="" type="checkbox"/> Construction stage photographs</p> <p><input checked="" type="checkbox"/> High Resolution Satellite Images</p> <p><input checked="" type="checkbox"/> Soft copies of Project and Calculations</p> <p><input checked="" type="checkbox"/> Leas Agreement with Mahindra Holidays</p> <p><input checked="" type="checkbox"/> NOC from Mahindra</p> <p><input checked="" type="checkbox"/> Nagar Niyojan Plan</p> <p><input checked="" type="checkbox"/> NOC from Kensville</p> <p><input checked="" type="checkbox"/> Ownership affidavit</p>
<p>Project Verifier's Confirmation:</p>	<p>The UWR RoU Project Verifier INI Infrastructure & Engineering Pvt. Ltd. (INI IE) certifies the following with respect to the UWR Project Activity Surface water storage and reuse of recycled sewage wastewater at Kensville golf and country club, District Ahmedabad, Gujarat, India by Millenniumpark Holdings Pvt. Ltd.</p> <p><input checked="" type="checkbox"/> The Project Owner has</p>



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	<p>correctly described the Project Activities in the PCNMR dated January, 2025 including the applicability of the guidance documents and water data as outlined in the UWR RoU Standard:</p> <p>RoU Scope 2: Measures for conservation and storage of excess surface water for future requirements and conservation of freshwater related ecosystems and wetland protection;</p> <p>RoU Scope 5: Conservation measures taken to recycle and reuse water, spent wash, wastewater etc., across or within specific industrial processes and systems.</p> <p>On verification of PCNMR from UWR's website it is noticed that occupancy data basis for STP is not documented well.</p> <p>PP has leased out the club property to MHRIL from 22 December 2021 with all infrastructures and amenities. Mahindra Holidays and Resorts India Limited has issued a No Objection Certificate in favor of Millenniumparks, expressly waiving any and all rights to raise or claim credits pertaining to the said property for the duration of the lease period, and granting full consent to Millenniumparks for raising such credits during the said term.</p> <p>Considering the NOC and the STP commissioning report the PP is rightly eligible to claim the RoUs from the period 01.01.2015 and during the lease period as</p>
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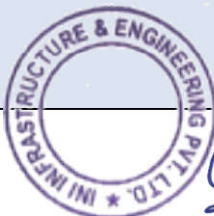
well.



Further, it was confirmed that the property for which the Project Proponent is raising the credits is jointly owned by Millenniumpark Holdings Private Limited (MPHPL) and Kensville Golf Private Limited (KGPL). In light of KGPL's eligibility to raise or claim the same credits, a No Objection Certificate (NOC) was duly executed, waving KGPL's rights to claim any vintage credits for the period specified in the PCNMR, thereby authorizing MPHPL to raise and claim the credits for the property in question.

The Right of Use (RoU) approvals from the period 2014-15 up to 31.12.2023 have been granted based on the No Objection Certificate (NOC) and Affidavit provided by MPHPL along with all the document that was provided by them. For calculating the RoUs from STP calculation of 60 days per year occupancy is considered instead of 120 days per year as claimed is taken, considering evolvement of lifestyle and distance of the site from nearest city i.e. Ahmedabad. Hence the RoUs has been calculated according to the standard mentioned in the UWR.

Specifically:

- RoUs related to the Sewage Treatment Plant (STP) have been issued for the period from **01.01.2015 to 31.12.2023**.
- RoUs related to the ponds for conservation and storage of excess surface water for future requirements and



	<p>conservation of freshwater related ecosystems and wetland protection have been issued for the period from 01.06.2014 to 30.09.2023*</p> <p><input checked="" type="checkbox"/> The Project Activity is likely to generate RoUs estimated at 1,531,228 m³ which are applicable as per UWR rules.</p> <p><input checked="" type="checkbox"/> The Project Activity is not likely to cause any net-harm to the environment and to the society</p> <p><input checked="" type="checkbox"/> The Project Activity complies with UWR T &C version 6 dated October, 2023 and UWR Rainwater Offset unit verification standards version 2.0 dated 21/10/2023 and therefore recommends UWR Program to register the Project activities with RoUs.</p>
Project Verification Report, reference number and date of approval	Verification report UCR ID NO. 483 dated Jan 2025
Name of the authorised personnel of UWR Project Verifier and his/her signature with date	  Mr. Chintan Thanki Associate Director – Legal / Finance

* Note: As per the prescribed standards, the designated period for calculating rainwater harvesting extends from 1st June to 30th September of each calendar year. While assessing water conservation reports by Indian Metrological Department, rainfall data for this specific timeframe is taken into consideration. Additionally, rainfall occurring outside of this defined period is also accounted for, as off-season precipitation contributes to overall water conservation.

PROJECT VERIFICATION REPORT

Section-A Executive summary

Milleniumpark Holding Pvt. Ltd. has appointed INI Infrastructure and Engineering Pvt. Ltd. as verifier to carry out the verification of the project activities "Surface water storage and reuse of recycled sewage wastewater at Kensville Golf and Country Club, Ahmedabad District, Gujarat, India". This refers to UCR approved for verification project ID: 483 to verify number of RoUs generated by water conservation project over the monitoring period from **01/06/2014 to 31/12/2023** (9 years 7 Months). The project activities aim to conserve the groundwater by creating Surface water storage and recycled sewage water through gainful use for irrigation purposes. INI IE confirms that the total Rainwater Offset Units or Water Credits (RoU) generated over the monitoring / verification period stated in the Project Concept Note & Monitoring Report (PCNMR), uploaded on UWR website is found satisfactory and in alignment to the UWR standards.

The Rainwater Offset Units or Water Credits (RoU) are calculated based on UWR framework which draws reference from, UWR Rainwater (RoU) Standard, version 6.1. dated 17/11/2023. The verification has been done by physical site visit, ways of verification like virtual interactions and submission of documents for verification through emails as per UWR standards.

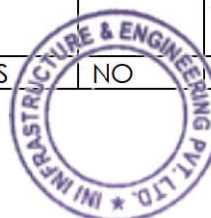
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INI Infrastructure & Engineering Pvt. Ltd. certifies that the Rainwater Offset Units or Water Credits (RoU) from the project "Surface water storage and reuse of recycled sewage waste water at Kensville golf and country club, Gujarat, India" (UCR ID – 483) for the period **01/06/2014 to 31/12/2023**. RoUs related to the Sewage Treatment Plant (STP) have been issued for the period from 01.01.2015 to 31.12.2023. RoUs related to the Surface water storage (ponds) have been issued for the period from 01.06.2014 to 30.09.2023 in combination of both plant the total RoUs amounts to **1,531,228 RoUs**.

Section- B Project Verification team, technical reviewer and approver

Project Verification team

N o	Role	Last name	First name	Affiliati on	Involvement in			Intervi ews
					Doc review	On-site inspect ion	Off-Site inspecti on	
1	Team Leader, validator	Thanki	Chintan	N/A	YES	NO	YES	NO
2	Technica l Expert, approver	Thakkar	Nehal	N/A	YES	YES	YES	YES
3	Technica l Expert,	Prabhakaran	Bhavna	N/A	YES	YES	YES	YES
4	Financial / Other Expert	Thanki	Chintan	N/A	YES	NO	YES	NO
5	Trainee	Vellotuparambil	Anjali	N/A	YES	NO	YES	NO



Chintan

Technical reviewer and approver of the Project Verification report

No.	Role	Last name	First name	Affiliation (e.g. name of central or other office of UWR RoU Project Verifier or outsourced entity)
1.	Technical reviewer, Approver	Thakkar	Nehal	INI INFRASTRUCTURE &ENGINEERING PVT. LTD.
2.	Technical reviewer	Prabhakaran	Bhavna	INI INFRASTRUCTURE &ENGINEERING PVT. LTD.

Section-C. Means of Project Verification

C.1 Desk/document review

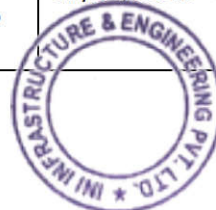
As part of the review and verification process, Millenium Park Holdings Pvt. Ltd submitted a Project Concept Note & Monitoring Report (PCNMR), Water Credit Calculation Sheet, Satellite Imagery maps, photographs and other relevant data provided upon request pertaining to this project for examination to the Lead Verifier. These documents are thoroughly reviewed to ensure compliance with UWR standards and to validate the completeness of the information/data provided.

C.2 On-site & Off-site inspection

Date of on-site inspection: 20/02/2025			
No.	Activity performed On-Site	Site location	Date
1.	Visit of all the twelve ponds and STP	Ahmedabad, Gujarat	22/02/2025
2.	Supporting documents provided before, during, and after the verification.	Ahmedabad, Gujarat	January 2025 to 26/05/2025

C.3. Interviews

No.	Interview			Date	Subject
	Name	Designation	Affiliation		
1.	Ms. Anjanee Patel	Sr. Sustainability Analyst	Savvy Greens	January 2025 to May 2025 – as and when required	For Project Activities and clarifications
2.	Mr. Pradyumna Sahoo	Incharge	Milleniumpark Holding Pvt. Ltd.	22/02/2025	Project Operations
3.	Mr. Vivek Shah	Project Aggregator and Consultant	SDG-CR Consulting LLP	17/04/2025	Project Activities



C.4. Sampling approach

Not applicable

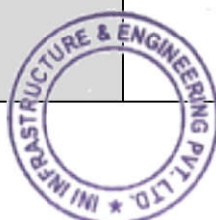
C.5. Clarification request (CLs), corrective action request (CARs) and forward action request (FARs) raised

Areas of Project Verification findings	No. of CL	No. of CAR	No. of FAR
Rainwater Offset Units or Water Credits (RoU)			
Identification and Eligibility of project type	Nil	Nil	Nil
General description of project activity	1	Nil	Nil
Application and selection of methodologies and standardized sets	6	Nil	Nil
- Application of RoU methodologies and standardized data sets	4	Nil	Nil
- Deviation from methodology and/or methodological tool	Nil	Nil	Nil
- Clarification on applicability of methodology, tool and/or standardized data sets	Nil	Nil	Nil
- Project boundary and unutilized water sources	1	Nil	Nil
- Likely scenario without RoU Project	1	Nil	Nil
- Estimation of RoUs	Nil	Nil	Nil
- PCNMR	Nil	Nil	Nil
Start date, crediting period and duration	Nil	Nil	Nil
Positive environmental impacts on water table and/or groundwater recharge and/or water security in the area	Nil	Nil	Nil
Project Owner- Identification and communication	2	Nil	1
Others (please specify)	Nil	Nil	1
Total	9	Nil	2

Section D. Project Verification findings

D.1. Identification and eligibility of project type (Approved Project Activities - Positive List)

Means of Project Verification	For identification and eligibility of project type, below mentioned data were referred and verified: <ul style="list-style-type: none">• Project Documentation: Detailed project reports, including the Project Concept Note & Monitoring Report (PCNMR), outlining the project's scope, objectives, and outcomes.• On-Site & Off- Site Inspection: On-Site to verify the implementation and operation of the project activities and Off-site inspection of records and calculations.
Findings	As per on-site verification, it was found that the project includes below activities by Milleniumpark holdings at Kensville Golf and Country Club, District Ahmedabad, Gujarat, India: 1) Rainwater conservation by creating artificial ponds for surface water storage and thereby gainful use

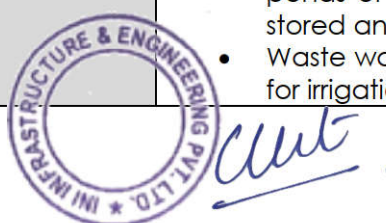


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	<p>for irrigation purposes and;</p> <ol style="list-style-type: none"> 2) Recycling of sewage wastewater and gainful use of treated water for irrigation purposes. 3) The project is in India where UNDP Human Development Indicator is 0.644 which is less than 0.9 and National Water Security Index is 2 as mandated by UWR rainwater standard. 4) The project activities are as per the approved project activities/ positive list and approved scopes as outlined in UWR rainwater (RoU) standard. 5) The project meets sustainability goals to promote sustainable water development and helps maintain groundwater reserves and ensures water security in India to attain the Sustainable Development Goals (SDGs) 6, 9, 11, 12 and 13. Thus, the project activities, as observed, help support environmental and community well-being.
Conclusion	In conclusion, the project activities are as per UWR RoU Standard

D.2. General Description of project activity

Means of Project Verification	<p>Below were reviewed for UWR Project activities description verification:</p> <ul style="list-style-type: none"> • Project Documentation: Detailed project reports, including the Project Concept Note & Monitoring Report (PCNMR), outlining the project's scope, objectives, and outcomes. • On-Site & Off- Site Inspection to verify the implementation and operation of the project activities. • Supporting Data: <ol style="list-style-type: none"> 1) Rainfall data 2) Surface water potential calculations 3) bathymetric survey data and drawings of all the pond contours and storage capacity of twelve ponds 4) Construction photographs of ponds 5) High Resolution Satellite images 6) Borewell location map and photograph 7) Plumbing layout of Club 8) Inspection of club rooms and STP 9) STP work order 10) STP Commissioning data 11) Survey no. to verify the ownership of Pond
Findings	<ul style="list-style-type: none"> • Upon verification, it was found that the project activities at Kensville involve creating twelve artificial ponds of varying size by which rainwater is collected, stored and used for future usage. • Waste water from the club house is recycled and used for irrigation purpose.

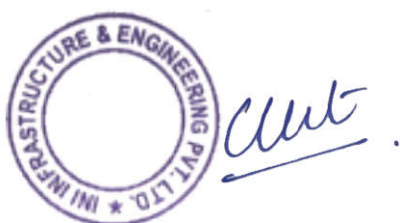


	<ul style="list-style-type: none"> CL-02 was raised for location map of bore well and water balance calculation to rule out double counting. It was closed successfully.
Conclusion	The Description of the project activities is as per UWR RoU Standard.

D.3. Application and selection of methodologies and standardize baselines

D.3.1. Application of methodologies and standardized baselines

Means of Project Verification	<p>For verification of application of methodology, on-site and off-site inspection was carried out.</p> <p>On-site inspection was for reviewing project activities for scope 2 and 5:</p> <ol style="list-style-type: none"> 1. Physical site visit to observe the existence of twelve ponds 2. Physical site visit to observe irrigation area 3. Physical site visit to observe STP functioning, club rooms and occupancy 4. Plumbing fixtures installed at Club toilets and kitchen <p>Off-site Data Verification:</p> <ol style="list-style-type: none"> 5. Surface water potential/ the availability of annual rainwater and applicability of infiltration run-off coefficient. 6. High resolution satellite images to verify existence of ponds before and after project construction 7. Capacity calculation of twelve ponds by bathymetric survey data and applicability of evapotranspiration 8. Club plan with plumbing layout 9. STP capacity and water balance calculations 10. STP Commissioning Certificate.
Findings	CL-01, 03, 04, 05, 08 and 09 were raised and supporting documents were requested to solve the query. CL- 01 CL-03, CL-05, CL-08 and CL-09 were closed successfully. CL-04 partly concluded.
Conclusion	<p>In conclusion,</p> <p>On Site and of site verification were done; accordingly, queries were raised and the same were closed. Only the occupancy details were not provided due to confidentiality reason and henceforth the CL – 04 is partly concluded.</p>

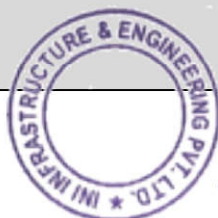


D.3.2. Clarification on applicability of methodology, tool and/or standardized baselines and RoU estimates

Means of Project Verification	Methodology of project activities RoU estimates involved below aspects: For Scope-2 Rainfall data review; Hydrological losses – evapotranspiration & infiltration; Calculation of annual available rainwater for conservation considering roof, paved, turf and water bodies area and relevant rainwater runoff coefficient; Pond volume calculation by bathymetric survey data. For Scope-5 STP capacity calculations, water balance, resultant STP recovered treated water calculation.
Findings	No clarifications raised for scope-2. CL-04 and 05 were raised for scope-5.
Conclusion	In conclusion, For Scope-2; applicability of methodology, tool and standardized data sets are as per UWR RoU Standard, and no clarifications were raised for this. For scope 5, The occupancy has been considered as 50% of the provided data. The STP commissioning data has been submitted by the client and has been verified to be consistent with the claimed date of commissioning. The data relating to Work order and the commissioning of STP has been provided. CL-04 is partially concluded.

D.3.3. Project boundary, Water sources and RoUs

Means of Project Verification	Below were reviewed for project boundary and water sources: 1) Rainfall data, high resolution satellite image and AutoCAD drawings of bathymetric survey drawings for artificial ponds. 2) STP capacity, Water balance and STP recovered treated water calculation The Nagar Niyojan Plan has been submitted by the Project Proponent (PP) as evidence substantiating ownership of the land on which the pond and resort are situated, in support of the credits claimed for the specified area. In addition, an affidavit has been provided affirming the veracity of this claim.
Findings	As per D.3.1, CL-01, 03, 04, 05, 08 and 09 were raised for supporting documents. CL- 01, CL-03, CL-05, CL-08 & CL-09 were closed successfully. The work order has been submitted by the client, but the occupancy details are pending hence CL – 04 is only partly concluded.
Conclusion	In conclusion, For scope-2; project boundary CL-08 has been raised to verify the ownership detail and that has been successfully closed, water sources and RoUs are verified and matches with as mentioned in PCNMR. For scope 5, CL- 05 The STP commissioning data has been submitted by the client and has been verified to be consistent with the claimed date of commissioning.



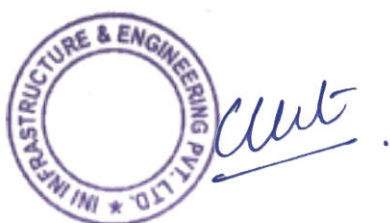
D.3.4. Baseline scenario of the water shed or activity prior to project commissioning

Means of Project Verification	For baseline scenario identification, below were reviewed: <ul style="list-style-type: none">• Toposheet no-46B/1 concerning Kensville golf and country club which was generated in 1998-99. The toposheet is generally created using ariel photography, ground survey, and geographic information systems (GIS) technology. This map has been referred to establish a baseline scenario.• Other satellite images were used to establish the authenticity of the rainwater conservation initiatives undertaken by project proponent.• Construction photographs of ponds.
Findings	<ul style="list-style-type: none">• As per the toposheet; it is observed that there was no surface water storage structure within the site boundary before 2006.• CL-06 was raised for construction photographs of the ponds and closed successfully determining that ponds were not natural but constructed by PP.
Conclusion	<ul style="list-style-type: none">• In conclusion; before the project started, rainwater in the area was not collected and would either flow into surrounding drains and go to waste. This meant a missed chance to save water, leading to ongoing water shortages and no benefit to the society or the environment.

D.3.5. Demonstration of no net harm additionality

The project collects unutilized water or rainwater from going into surrounding storm drains.

- The project conserves and stores excess water for future use and thereby conserves ground water.
- Water conservation projects benefit people, the economy, and nature.
- The project contributes to UN sustainable development goals encompassing environmental, social and government standards as a key basis for eligibility on the UWR platform.
- The project has made a big impact on saving water through rainwater collection and wastewater recycling. Its water-saving methods are working well. This reduces the need for groundwater and helps protect water resources for the future. The project's success in measuring and reaching these savings proves its strong support for sustainable water use.
- Thus, the project activity is deemed automatically no net harm additional as defined by UWR standard.



D.3.6. Estimation of RoUs

Means of Project Verification	<p>Below were assessed to verify calculation of RoUs:</p> <p>Scope-2</p> <ul style="list-style-type: none"> • Surface water potential - the availability of annual rainwater and applicability of infiltration run-off coefficient • Capacity calculation of twelve ponds by bathymetric survey data and applicability of evapotranspiration <p>Scope-5</p> <ul style="list-style-type: none"> • STP capacity • Club plan with piping network • Plumbing fixtures installed at Club
Findings	<p>Regarding Scope-2, upon verification, it was found that all the calculations and quantification tools are as per UWR standard.</p> <p>Regarding Scope-5, CL-05 The STP commissioning data has been submitted by the client and has been verified to be consistent with the claimed date of commissioning.</p> <p>CL-04 The work order for STP is provided by the PP which verifies the claim, but the Occupancy details are not provided hence CL-04 is not concluded.</p> <p>Further, PP has leased out the club property to MHRIL from 22 December 2021 with all infrastructures and amenities.</p> <p>Mahindra Holidays and Resorts India Limited has issued a No Objection Certificate in favor of Millennium Parks, expressly waiving any and all rights to raise or claim credits pertaining to the said property for the duration of the lease period, and granting full consent to Millennium Parks for raising such credits during the said term.</p> <p>Thus, RoUs from 2015 to 31-12-2023 are approved on 60 days per year occupancy instead of 120 days per year as claimed considering evolution of lifestyle and distance of the site from nearest city i.e. Ahmedabad.</p>
Conclusion	<p>It is concluded that the estimation of Rainwater Offset Units or Water Credits (RoU) from the project "Surface water storage and reuse of recycled sewage waste water at Kensville golf and country club, District Ahmedabad, Gujarat, India" (UCR ID – 483) for the period 01/06/2014 to 31/12/2023 amounts to 1,531,228 RoUs, which equates to 1,531,228,000 liters of water.</p>



D.3.7. PCN+Monitoring Report

Means of Project Verification	For PCNMR assessment below were reviewed: <ul style="list-style-type: none">• The PCNMR format and content• Applicability of UWR rainwater (RoU) standard• Applicability of UWR verification standard• Quantification tools as per UWR RoU standard
Findings	<ul style="list-style-type: none">• Quantification tools are Bathymetric survey, DEM (Digital Elevation Model) by using remote sensing and GIS techniques• The PCNMR provides detailed calculations of rainwater analysis, earth surface assessment (water shed and drainage pattern), hydrological losses, water conservation, surface water potential, ground water storage, resistivity survey, geomagnetic survey, surface recharge potential and ground water recharge potential• The PCNMR provides storage calculation of all the ponds with calculation sheets, contour maps and graphs.• The report provides detailed calculation of STP recovered treated water. However, CL-04 related to STP occupancy basis are not concluded.
Conclusion	The PCNMR is as per UWR Rain Water standard. Also, FAR 01 and 02 have been suggested.

D.3.8. National Water Security Index

The project is in India where UNDP Human Development Indicator is 0.644 which is less than 0.9 and National Water Security Index is 2 as mandated by UWR rainwater standard.

the National Water Security Index for India shows the urgent need for better water management.

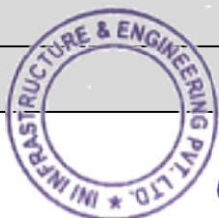
The index points out big differences between regions in terms of water availability, quality, and infrastructure.

It highlights problems like water shortages, pollution, and wasteful use.

The report stresses the need for a combined approach to managing water, more investment in water systems, and involving communities.

D.4. Start date, crediting period and duration

Means of Project Verification	Project Documentation: Detailed records and reports, such as the Project Concept Note & Monitoring Report (PCNMR), which outline the project's timeline and milestones. Official Records: Legal and administrative documents, including permits, agreement and approvals, that confirm the project's initiation and operational phases.
Findings	CL-04 raised for Occupancy basis is not concluded.



Conclusion	<p>Scope-02: The project activity start date for Kensville golf and country club is 01/06/2014. The crediting period spans from 01/06/ 2014 to 31 /12/2023, covering 9 years and 7 months which is as per UWR standard.</p> <p>Scope-05: It was found that construction of STP started in 2012 and the same became operational effective from 2014.</p> <p>Further, PP has leased out the club property to MHRIL from 22 December 2021 with all infrastructures and amenities. Thus, the rights of the property are transferred to MHRIL. For the same CL-09 was raised requesting an NOC hence CL-09 is closed and concluded. Hence The RoUs raised for the said crediting period is verified.</p>
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D.5. Positive Environmental impacts

Means of Project Verification	<ul style="list-style-type: none"> To assess project activity does not cause any net harm to the environment, site visit was conducted and observations of the artificial ponds and surrounding areas were noted.
Findings	<ul style="list-style-type: none"> Monitoring the artificial ponds and surrounding areas was found to support a healthy ecosystem and increase biodiversity. These ponds have transformed barren areas into vibrant, water-rich environments, fostering a healthier microclimate habitat for various plant and animal species. Ecological Aspects: Kensville with its theme of flora, fauna, creates tranquil environment. It has wide open spaces, green lawns, blooming wildflowers, and artificial ponds. It's also a natural home for over 2 lakh trees and 50+ bird species and a place for migratory birds. The project ensures sustainable water management.
Conclusion	In conclusion, the project has overall positive environment impact.

D.6. Local stakeholder consultation

Not applicable

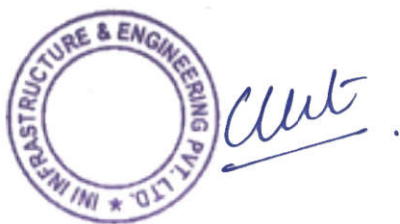


D.7. Project Owner- Identification and communication

Means of Project Verification	<p>The project owners identification and communication was verified by below:</p> <ul style="list-style-type: none"> • Email communications • Phonecalls • Sitevisit • Legal agreement of owner with club operator (as per CL-07) • Ownership Proof of the Pond & Resort (CL-08 raised and concluded). • Claim on the credit raised (CL-09 was raised to provide an NOC and the same was concluded and closed).
Findings	<ul style="list-style-type: none"> • Detailed support document list was sent to the owners for verification of the PCNMR which was provided by the owner. Upon verification it was found that the project owner highlights the importance of clear communication. • PP has leased out the club property to MHRIL from 22 December 2021 with all infrastructures and amenities. Thus, the rights of the property are transferred to MHRIL.
Conclusion	<p>The project Owner's identification and communication details are verified for scope -02 and scope-05. The ambiguity on the RoUs generated through the STP was sorted by getting an NOC from MHRIL affirming that it has no objection to the Project Proponent raising and claiming the associated credits.</p>

D.8. Positive Social Impact

Means of Project Verification	<p>For Positive Social Impact / No net harm to the society, site visit was conducted and below was reviewed / conducted:</p> <ul style="list-style-type: none"> • Physical visit to site and Surveys / feedback from employees and the local community to assess improvements in well-being, awareness, and engagement in sustainable practices.
Findings	<p>No clarifications raised.</p>
Conclusion	<p>The project has improved the aesthetic and recreational value of the area, contributing to employee well-being and raising awareness about sustainable water management practices. Overall, the initiative demonstrates a strong commitment to environmental sustainability and corporate social responsibility.</p>



D.9. Sustainable development aspects

Means of Project Verification	Below were conducted to review sustainable development aspects: <ul style="list-style-type: none">• Site visit: Observing and experiencing the local climate and wildlife• Biodiversity observations: studying local plants and animals to see how the project affects nature• Community feedback: Asking local people and staff for their opinions to understand the project's social and environmental impact and improve it if needed
Findings	The project helps the entire Kensville area by building several farm pond to save rainwater. This provides enough water for farming all year and helps reduce the use of groundwater. The main aim is to support sustainable water use, protect groundwater levels, and ensure water security in India. It also supports Sustainable Development Goals (SDGs) 6, 9, 11, 12, and 13.
Conclusion	The project ensures universal water access and builds resilient infrastructure. It ensures quality water resources and promotes the sustainable management of water resources including water related ecosystems.

Section- E. Internal quality control

During the project's verification phase, strict quality checks were followed to make sure all calculations were accurate and trustworthy. This included regular internal audits of documents and reports to find mistakes if any. The verification team got ongoing training to keep their skills up to date. Clear step-by-step procedures (SOPs) were used for collecting, analyzing, and reporting data, making sure verification was conducted as per UWR Standard. All records were well-organized and transparent, showing the sources and applicability. Team reviews and discussions helped confirm the results.

Section-F. Project Verification opinion

The Project Verification Opinion for the Kensville golf and country club- "Surface water storage and reuse of recycled sewage waste water at Kensville Golf and Country Club, Ahmedabad District, Gujarat, India" would likely focus on the following key points:

- **Compliance with UWR RoU Standards:** The project adheres to the Universal Water Registry Rainwater Offset Unit (UWR RoU) standards, ensuring proper documentation and monitoring of rainwater harvesting.
- **Environmental Impact:** The project has significantly improved local biodiversity, enhanced microclimate, and contributed to water conservation efforts, demonstrating a positive environmental impact.
- **Sustainable Practices:** By implementing rainwater harvesting, sewage waste water, and promoting water conservation awareness, the project exemplifies sustainable water management practices.
- **Operational Efficiency:** The project has been effectively managed with monitoring, ensuring the long-term sustainability and functionality of the artificial lake, recycling of waste water and associated water management systems. Forward actions request 01 and 02 are made for better effectiveness of operations and future RoUs claims.



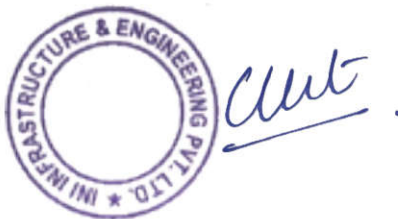
This opinion would affirm that the project has successfully achieved its environmental and sustainability goals. In our opinion, the total RoU's over the crediting / verification period stated in the Project Concept Note and Monitoring Report, PCNMR submitted to INI Infrastructure & Engineering Pvt. Ltd., are found to be correct and in line with the UWR guidelines.

The verification was done by way of physical site visits, off-site document verifications, phone calls and submission of documents for verification through emails.

On verification of PCNMR from UWR's website it is noticed that occupancy data basis for STP is not documented well. It was found that construction of STP started in 2012 and the same became operational effective from 2015. Furthermore, start date of STP is clear from the work order. Further, PP has leased out the club property to MHRIL from 22 December 2021 with all infrastructures and amenities. Thus, the rights of the property are transferred to MHRIL. For the same an NOC has been signed by MHRIL waving their rights to claim at present or in future for the RoUs specified during the Lease Period.

Considering all the above, PP is eligible to claim RoUs for the STP from the period 01.01.2015 till 31.12.2023. Thus, RoUs from 2016-17 to 22 December 2021 are approved for 60 days per year occupancy instead of 120 days per year as claimed considering involvement of lifestyle and distance of the site from nearest city i.e. Ahmedabad, and for the Surface water Storage the calculation period is from 01-06-2014 till 30-09-2023

INI Infrastructure & Engineering Pvt. Ltd. is able to certify that the RoUs from the "Surface water storage and reuse of recycled sewage waste water at Kensville golf and country club, Ahmedabad District, Gujarat, India" (UCR ID – 483) for the period **01/06/2014 to 31/12/2023** amounts to **1,531,228**



Appendix 1. Abbreviations

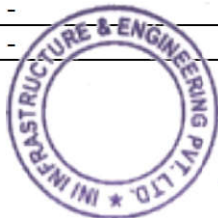
Abbreviations	Full texts
CAR	Corrective action request
CL	Clarification request
FAR	Forward action request
PA	Project aggregator
PCNMR	Project concepts note & monitoring report
PP/PO	Project proponent / project owner
ROUs	Rainwater Offset Units
SDG	Sustainable development goal
UWR	Universal water registry
VR	Verification report
VS	Verification statement
MHRIL	Mahindra Holidays & Resort India Ltd.
MPHPL	Millenniumpark Holdings Private Limited
KGPL	Kensville Golf Private Limited
INI IE	INI Infrastructure & Engineering Private Limited
NOC	No Objection Certificate

Appendix 2. Competence of team members and technical reviewers

Sr. No.	Role	Name	Educational qualification
1	Team leader / validator	Chintan Thanki	Master of Commerce, Chartered Accountant.
2	Technical reviewer, Approver	Nehal Thakkar	Bachelor of Technology, Indian Green Building Council Accredited Professional
3	Technical reviewer	Bhavna Prabhakaran	Diploma in Architecture (Equivalent to B.Arch), Master of Planning, Associate of the Institute of Town Planners, Council of Architecture
4	Trainee – Legal aspects	Anjali	Batchelor's of Legislative Law, Master of Laws

Appendix 3. Document reviewed or referenced

No.	Author	Title	Provider
1	SDGC	PCNMR	SDGC
2	SDGC	Water Calculation Sheets	SDGC
3	SDGC	Bathymetric survey maps and calculations	SDGC
4	-	Site layout plan	PP
5	-	High resolution satellite images	PP
6	-	Plumbing layout of Club	PP
7	-	Bore well location map	PP
8	-	Purchase Order of STP	PP



9	SDGC	Water balance diagram	SDGC
10	UWR	UWR Standard	UWR
11	UWR	UWR Verification Standard	UWR

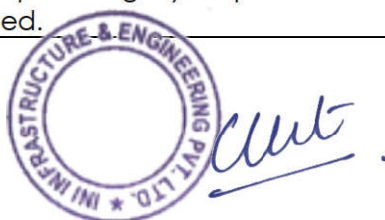
Appendix 4. Clarification request, corrective action request and forward action request

TABLE 1. CLS FROM THIS PROJECT VERIFICATION

CL ID	01	Section no.	Date: 21/02/2025
Description of CL			
PP shall provide supporting documents for scope -2: Soft copies of master plan, bathymetric survey drawings & calculations of all ponds			
Project Owner's response			Date: 19/03/2025
PP provided required supporting documents for scope -2			
Documentation provided by Project Owner			
AutoCAD drawings of bathymetric survey of all ponds & calculations. photographs and videos photos and videos of execution of bathymetric survey. High resolution satellite image of the project master plan was provided.			
UWR Project Verifier assessment			Date: 20/03/2025
The soft copy of master plan and bathymetric survey drawings of ponds were successfully verified and were as per PCNMR version 1.0. So, this part of CL is closed.			

CL ID	02	Section no.	Date: 24/02/2025
Description of CL			
PP shall provide Borewell location map and surface water balance calculation			
Project Owner's response			Date: 15/04/2025
PP provided required details			
Documentation provided by Project Owner			
PP provided borewell location map, photograph and surface water balance calculation			
Documentation provided by Project Owner			Date: 16/04/2025
The bore well location map and water balance calculations were successfully verified to rule out double counting. So, this part of CL is closed.			

CL ID	03	Section no.	Date: 24/02/2025
Description of CL			
PP shall provide supporting documents for scope -5 : Soft copies of Club plumbing layout plan and STP drawing			
Project Owner's response			Date: 19/03/2025
PP provided required supporting documents			
Documentation provided by Project Owner			
PP provided Soft copies of Club plumbing layout plan, toilet plumbing layout plan and STP drawing			
UWR Project Verifier assessment			Date: 20/03/2025
Club plumbing layout plan and STP drawing were successfully verified. So, this part of CL is closed.			

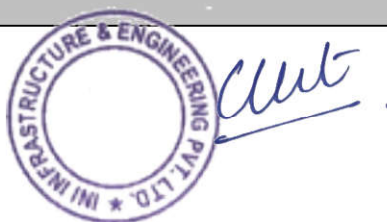


CL ID	04	Section no.		Date: 24/02/2025
Description of CL				
PP shall provide supporting documents for scope -5 : STP work order and occupancy basis				
Project Owner's response				Date: 28/04/2025
PP provided partial details				
Documentation provided by Project Owner				
PP provided STP work order				
UWR Project Verifier assessment				Date: 28/04/2025
The STP work order was successfully verified. occupancy data for the resort was requested, but it was not made available due to confidentiality. The current report by the aggregator assumes 120 days per year as occupancy for the resort. Looking at the evolvement of the lifestyle and the distance of the site from the nearest city i.e. Ahmedabad, it seems that 120 days per year occupancy is difficult to achieve for the year 2015-2023 and therefore it is suggested that the claimed ROUs shall be discounted by not less than 50% for the approved period. So, this part of CL is not concluded.				

CL ID	05	Section no.		Date: 24/02/2025
Description of CL				
PP shall provide supporting documents for scope -5 : Commissioning report				
Project Owner's response				Date: 28/04/2025
pp provided with the work completion certificate				
Documentation provided by Project Owner				
PP provided STP work order, but commissioning report was not available.				
UWR Project Verifier assessment				Date: 28/04/2025
Based on the information available on records, and the Work Completion certificate provided by the PP certifies that the STP has been commenced from the day as on 10-05-2014.				

CL ID	06	Section no.		Date: 21/02/2025
Description of CL				
PP shall provide photographs of pond construction				
Project Owner's response				Date: 19/03/2025
PP provided required details				
Documentation provided by Project Owner				
PP provided photographs of pond construction and maintenance bill				
UWR Project Verifier assessment				Date: 20/03/2025
The photographs of pond construction provide proof that ponds are not natural but constructed by the Project proponent. So, this part of CL is closed.				

CL ID	07	Section no.		Date: 18/04/2025
Description of CL				
PP shall provide its agreement with Club operator MHRIL to provide information on whether it is liable to get any RoUs legally.				
Project Owner's response				Date: 24/04/2025
PP provided the agreement				
Documentation provided by Project Owner				
PP provided the lease agreement with MHRIL				
UWR Project Verifier assessment				Date: 25/04/2025



The agreement establishes the legal identity of the Project Proponent. According to the information provided by the PP, as evidenced by the Lease Agreement executed with Mahindra Holidays & Resorts India Limited (MHRIL), the subject property was granted to MHRIL on a long-term lease basis, effective from 22nd December 2021, along with all infrastructure and amenities as detailed in the said agreement. The transfer of the beneficial rights in the property to MHRIL commenced from the aforementioned effective date. Furthermore, it is noted that Millenniumpark Holdings Private Limited and Kensville Golf Private Limited are the joint owners of the property. Consequently, and in view of both the ownership structure and the lease arrangement, CL-09 was raised.

CL ID	08	Section no.		Date: 01/05/2025
Description of CL				
<i>PP shall provide The Ownership proof of all the ponds and the Resort for which the Credits are claimed.</i>				
Project Owner's response				Date: 05/05/2025
<i>PP provided the documents</i>				
Documentation provided by Project Owner				
<i>Pp provided the Master plan of site with survey no and Nagar Niysojan details to prove the ownership of Pond, along with the notarized affidavit stating that the survey no provided them is under their ownership</i>				
UWR Project Verifier assessment				Date: 12/05/2025
The document submitted by the Project Proponent contains details pertaining to the survey numbers encompassing the entire Kensville area, including the ponds and the resort premises. Based on the information provided therein, the ownership of the subject property was ascertained. Additionally, the Project Proponent has submitted a duly signed and notarized affidavit affirming that the survey number and the plot situated thereon are held under the joint ownership of Millenniumpark Holdings Private Limited (MPHPL) and Kensville Golf Private Limited (KGPL).				

CL ID	09	Section no.		Date: 07/05/2025
Description of CL				
<i>NOC form MHRIL & KGPL for raising the credits from the pond and Resort STP</i>				
Project Owner's response				Date: 12/05/2025
<i>PP provided the documents.</i>				
Documentation provided by Project Owner				
<i>PP submitted both the NOC duly signed by both the parties.</i>				
UWR Project Verifier assessment				Date: 13/05/2025
The Verifier directed the Project Proponent to obtain a No Objection Certificate (NOC) individually from MHRIL and KGPL duly signed by contesting parties involved in the claim and allocation of water credits. In compliance, a certificate was submitted by both Mahindra Holidays & Resorts India Limited (MHRIL) and Kensville Golf Private Limited (KGPL), explicitly stating that they have no objection to Millenniumpark Holdings Private Limited (MPHPL) claiming the water credits associated with the specific property, namely the resort, as well as the entire water credits arising from both the pond and the resort, respectively.				

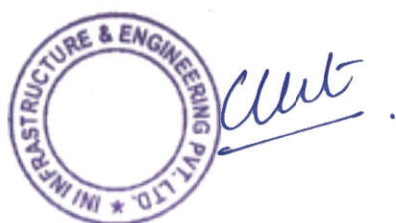


TABLE 2. CARS FROM THIS PROJECT VERIFICATION

CAR ID	NA	Section no.		Date: DD/MM/YYYY
Description of CAR				
NA				
Project Owner's response				Date: DD/MM/YYYY
Documentation provided by Project Owner				
UWR Project Verifier assessment				Date: DD/MM/YYYY

TABLE 3. FARs FROM THIS PROJECT VERIFICATION

FAR ID	01	Section no.		Date: 25/04/2025
Description of FAR				
PP is advised to provide water meters at inflow and outflow of STP for future as well as at all water sources for future RoU considerations.				
Project Owner's response				Date: DD/MM/YYYY
Documentation provided by Project Owner				
UWR Project Verifier assessment				Date: DD/MM/YYYY

FAR ID	02	Section no.		Date: 25/04/2025
Description of FAR				
PP is advised to keep documentation of maintenance work of ponds and STP for future RoU considerations.				
Project Owner's response				Date: DD/MM/YYYY
Documentation provided by Project Owner				
UWR Project Verifier assessment				Date: DD/MM/YYYY

