



# COMP PLAYBOOK

## Compliance Officer (HO)

JD | SOPs | Policies | Registers | Formats

**Use:** Operating manual for Compliance Officer (HO) supporting HO (1) + Sites (5). Follow the Swara Authority & Escalation Matrix. Approvals must be in writing (ERP/email/WhatsApp screenshot). Keep all compliance evidence audit-ready.

Playbook Outputs (Must)	Evidence / File Location (suggested)
COMP Job Description (JD) + KPI Scorecard	00_Admin & Governance / HR / JDs
COMP SOPs (SOP-01 to SOP-15) - one-by-one	00_Admin & Governance / SOPs / Compliance
COMP Policies (POL-01 to POL-12) - one-by-one	00_Admin & Governance / Policies / Compliance
COMP Registers (REG-01 to REG-20) - printable templates	00_Admin & Governance / Registers / Compliance
COMP Formats/Templates (FMT-01 to FMT-18) - printable templates	00_Admin & Governance / Formats / Compliance
Escalation ladder + Mandatory message format + 30-60-90 plan	00_Admin & Governance / Escalations & Onboarding

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- 5. Registers (One-by-One) - REG-01 to REG-20
- 6. Formats & Templates (One-by-One) - FMT-01 to FMT-18
- Appendix A: Quick Reference - authority limits & escalation triggers
- Appendix B: 30-60-90 day onboarding plan (COMP)

**How to use:** Print registers & formats for the compliance file. Keep scans in the project folder. If a record is missing, treat it as a compliance risk and escalate. This playbook is designed to be auditable - keep evidence.

# 1. Role Overview & Job Description (COMP)

**Role purpose:** Build and run a robust compliance system across HO and project sites. Prevent statutory penalties, notices, work stoppage risks, labour disputes and audit failures by maintaining on-time compliance actions with evidence and escalation discipline.

**Grade:** Suggested L3/L4 (Executive/Officer to Manager) depending on scope; align with Swara Salary Grade Structure.

**Reports to:** PM-HO (governance). Functional coordination with ACC-H, HR, Legal Officer and Safety Officer. Critical compliance escalations to OWN via PM-HO as per Escalation Matrix.

**Key interfaces:** PM-HO, PM-S, ACC-H/Accounts Officer, HR Executive, Legal Officer, Safety Officer (HSE), Purchase Manager, IT/ERP Coordinator, Contractors/Vendors, Liaison/Architect, Consultants.

## 1.1 Key responsibilities (Must)

- Maintain compliance calendar and ensure zero missed renewals/filings.
- Run contractor/vendor compliance onboarding and payment compliance gate discipline.
- Maintain statutory registers, certificates, challans, inspection and notice files (audit-ready).
- Handle authority visits/inspections and coordinate notice replies with Legal Officer/advocate.
- Run internal compliance audits and close observations with CAPA and evidence.
- Track labour compliance documentation (attendance, wage proofs, PF/ESIC where applicable) with site teams.
- Track environmental/waste disposal compliance evidence (especially demolition).
- Publish monthly compliance MIS with top risks, overdue items, decisions required.

## 1.2 Daily / Weekly / Monthly routine

### Daily:

- Receive and log any compliance communication/notice from site or authority; escalate same day.
- Verify critical site compliance items if high-risk work is running (demolition, lifting, excavation) - coordinate with SAFE.
- Update CAPA register for new issues and follow-ups.

### Weekly:

- Collect weekly site compliance checklist (COMP-FMT-02) from each site and review gaps.
- Run weekly compliance review call with PM-HO/ACC-H/HR - close overdue items (COMP-FMT-16).
- Verify payment compliance gates for major contractor payments (PF/ESIC/insurance/wage proofs).
- Update compliance scorecard (COMP-REG-19) and highlight top risks.

### Monthly:

- Prepare Monthly Compliance MIS (COMP-FMT-01) with overdue items, notices, audits and decisions required.

- Perform internal compliance audit (labour, insurance, waste, approvals file) and update COMP-REG-12.
- Conduct compliance awareness session and update training register (COMP-REG-13).
- Verify statutory display boards and photo evidence (COMP-REG-09).

### 1.3 KPI Scorecard (suggested)

KPI	Target / Standard	Evidence	Frequency
Overdue compliance items	0 overdue (critical)   <= 2 minor	COMP-REG-01 + MIS	Weekly/Monthly
Renewals completed before expiry	100% on-time renewals	COMP-REG-02 + certificates	Monthly
Notice handling	100% logged same day; replies before due date	COMP-REG-11 + dispatch proof	As needed
Audit observation closure	>= 90% closed within target date	COMP-REG-12 + closure evidence	Monthly/Quarterly
Vendor compliance completeness	>= 95% vendors compliant on pack	COMP-REG-15 + checklist	Monthly
Site compliance score	>= 85% average and improving trend	COMP-REG-19	Weekly
Penalties / statutory fines	0 penalties/fines	Accounts proof + notices log	Monthly

### 1.4 Boundaries & non-negotiables

- No expired certificates or missing statutory documents in the file.
- No payment recommendation without required compliance proofs (unless deviation approved in writing).
- No hiding of notices/inspections - report and log the same day.
- No back-dated registers. If missed, record as missed and escalate; fix system.
- If compliance risk is unclear, pause and escalate with evidence and deadline.

## 2. Phase Map (Phase 0-11) - COMP responsibilities & evidence

This table maps Compliance Officer responsibilities across the redevelopment lifecycle. Keep evidence filed for each phase.

Phase	Key compliance actions (owner/coordination)	Evidence / file (minimum)
Phase 0 - Governance & Setup	Set up compliance calendar (COMP-REG-01), document control, file structure, and audit schedule. Align all departments on compliance gate rules.	Compliance tracker, document index, kickoff minutes (COMP-FMT-16).
Phase 1 - Due Diligence & Pre-Development	Identify existing statutory liabilities, pending notices, labour risks, and local authority constraints. Build compliance risk register and closure actions.	Risk register (COMP-REG-16), notice register (COMP-REG-11), due diligence evidence.
Phase 2 - Feasibility & Offer Structuring	Estimate statutory costs (licenses, insurance, cess, approvals). Ensure DA/term sheet includes compliance clauses and responsibilities.	Feasibility note inputs; compliance cost checklist; key clauses list.
Phase 3 - Society Consensus & Documentation	Support Legal with compliant meeting documentation process, member data confidentiality, and evidence filing discipline.	Meeting minutes index; consent/objection registers (as shared by Legal).
Phase 4 - Agreements & Legal Closure	Ensure agreements contain compliance obligations and documentation requirements; set up statutory responsibility mapping (HR/ACC/PM).	Agreement clause checklist; responsibility matrix; approvals trail.
Phase 5 - Design Finalization & Value Engineering	Coordinate compliance requirements with design (fire, safety, access, occupancy norms) and ensure design decisions consider statutory constraints.	Design compliance checklist; remarks closure log.
Phase 6 - Approvals, RERA & Compliance	Maintain approvals/NOC file control, track conditions, support RERA readiness evidence and document version control.	Approvals file index (COMP-REG-20), submission/approval proofs.
Phase 7 - Vacate & Transit Management	Maintain documentation discipline for relocation/tenancy/vacation processes; ensure notices and records are filed for dispute defence.	Vacate records index; complaint logs and closure proofs.
Phase 8 - Demolition & Enabling Works	Track demolition permits, waste disposal compliance, hazardous material risk controls, and authority visit handling.	Demolition compliance pack; waste register (COMP-REG-14); inspection register.
Phase 9 - Construction Execution Controls	Run weekly compliance checks, labour documentation, PF/ESIC/insurance gate, audits, and CAPA closures. Keep projects inspection-ready always.	Weekly checklist (COMP-FMT-02), audit register (COMP-REG-12), CAPA (COMP-REG-17).
Phase 10 - Sales, Completion & Close-out	Support completion compliance: OC/BU/Completion documents, final audits, closure of licenses, and handover package indexing.	Close-out checklist (COMP-FMT-17), document handover index (COMP-REG-20).
Phase 11 - DLP & Post-Handover	Track post-handover complaints/cases, warranty/AMC compliance file, and final statutory closure if any pending obligations remain.	DLP logs (with CRM), case register (COMP-REG-18), final closure notes.

## 3. SOPs (In-depth, One-by-One) - SOP-01 to SOP-15

### COMP SOP-01: Compliance Calendar & Tracker Setup

**Objective:** Create a single source of truth for all statutory and internal compliance actions across HO (1) + Sites (5).

**Trigger / Frequency:** At project start and then reviewed weekly; updated whenever a new compliance item is triggered.

**Inputs:**

- List of applicable laws/registrations for Gujarat + local authority requirements (site-wise)
- Project details: entity name, site address, contractors list, project timeline
- Authority & Escalation Matrix (for escalation triggers and approval discipline)

**Step-by-step:**

- [ ] Create COMP-REG-01 with all items: registration/renewal, audit, display boards, training, insurance, PF/ESIC, BOCW, environmental.
- [ ] Assign owner for each item (HR/ACC-H/PM-S/SAFE/PUR-M/Legal) and define due date + reminder date (7/15 days).
- [ ] Define evidence requirement for each item (scan, challan, receipt, photo, certificate) and file path.
- [ ] Start a weekly compliance review call with PM-HO + ACC-H + HR (15-30 minutes) using COMP-FMT-16 minutes template.
- [ ] Escalate any overdue statutory item on the same day to PM-HO with evidence and decision required.

**Outputs / Evidence:**

- Live compliance calendar with owners, due dates and evidence links
- Weekly compliance review minutes + action list

**Registers / Formats used:** COMP-REG-01 | COMP-FMT-16, COMP-FMT-01

**Escalations:**

- Any statutory expiry within 7 days with no renewal action -> escalate to PM-HO same day.
- Any statutory notice/audit objection -> escalate to PM-HO within 48 hrs (or same day if legal risk).

## COMP SOP-02: Statutory Registrations, Renewals & Certificates Management

**Objective:** Ensure all registrations/certificates are valid, renewed on time and audit-ready (no gaps).

**Trigger / Frequency:** Monthly review; renewal actions as per certificate due dates.

### Inputs:

- Existing registration certificates and renewal history
- Authority portals/logins (where applicable) and payment modes
- Project/site list and contractor list

### Step-by-step:

- [ ] Maintain master register COMP-REG-02 with certificate number, authority, validity, renewal due date, owner.
- [ ] Collect missing certificates from departments/contractors; raise written request using COMP-FMT-10.
- [ ] Start renewal at least 15 days before expiry; capture payment proof and application acknowledgement.
- [ ] Store scanned copy in the project folder and reference in COMP-REG-02.
- [ ] After renewal, issue internal update to PM-HO/PM-S and archive old version (retain as per policy).

### Outputs / Evidence:

- Zero expired certificates
- Renewal file with application + payment + renewed certificate

**Registers / Formats used:** COMP-REG-02 | COMP-FMT-10

### Escalations:

- Certificate expired or renewal rejected -> escalate to PM-HO same day with impact and action plan.

## COMP SOP-03: Contractor & Vendor Compliance Onboarding

**Objective:** Onboard only compliant contractors/vendors and maintain statutory documents before any PO/WO/payment.

**Trigger / Frequency:** Before first PO/WO; refresh quarterly or when documents expire.

### Inputs:

- Vendor onboarding request from Purchase/PM-S
- KYC/GST/bank details, insurance, labour license details
- Scope of work and manpower deployment plan

### Step-by-step:

- [ ] Use COMP-FMT-03 checklist and collect: GST/PAN, bank, insurance, labour license (if manpower), PF/ESIC details, safety plan acceptance.
- [ ] Record all documents in COMP-REG-15 and COMP-REG-04 (insurance).
- [ ] If labour contractor: ensure contractor provides list of workers and statutory compliance commitment.
- [ ] Share compliance gaps to PUR-M/PM-S and block onboarding until gaps are closed (written closure).
- [ ] For high-risk vendors (demolition, lifting, electrical): coordinate with SAFE for additional compliance needs.

### Outputs / Evidence:

- Vendor compliance pack attached to vendor master / project file
- Clear 'OK to engage' confirmation (email/ERP note)

**Registers / Formats used:** COMP-REG-15, COMP-REG-04 | COMP-FMT-03

### Escalations:

- Pressure to issue PO/WO without compliance pack -> escalate to PM-HO immediately (no verbal approvals).

## COMP SOP-04: Labour Attendance, Wage & Payment Compliance Verification (Site)

**Objective:** Ensure labour attendance, wages and payment proofs are documented to avoid labour disputes and statutory penalties.

**Trigger / Frequency:** Daily capture; monthly wage verification; surprise checks weekly.

### Inputs:

- Contractor muster roll / attendance
- Wage sheet, bank transfer proofs
- Worker IDs and site entry logs

### Step-by-step:

- [ ] Maintain COMP-REG-05 for attendance/worker ID proof and ensure all workers have ID proof recorded.
- [ ] Collect monthly wage sheet and proof of payment; record in COMP-REG-06.
- [ ] Cross-check worker count with site gate records and supervisor logs to detect mismatch.
- [ ] If cash payments are used (not recommended), document receipts with signatures and escalate as high risk.
- [ ] Report discrepancies to PM-S and PM-HO and start corrective action (CAPA) using COMP-REG-17.

### Outputs / Evidence:

- Labour attendance + wage proof file (monthly)
- Reduced labour dispute risk with evidence

**Registers / Formats used:** COMP-REG-05, COMP-REG-06, COMP-REG-17 | COMP-FMT-02

### Escalations:

- Wage non-payment complaint or labour unrest -> escalate to PM-S immediately and PM-HO within 24 hrs.

## COMP SOP-05: PF/ESIC/Insurance Compliance Coordination

**Objective:** Ensure PF/ESIC and insurance compliance is tracked and proofs are available before payments/continuation.

**Trigger / Frequency:** Monthly; before major payment releases; quarterly audit.

### Inputs:

- PF/ESIC challans and ECR filings (contractor/employee where applicable)
- Insurance policies and renewals
- Payment schedule and vendor bills list

### Step-by-step:

- [ ] Update COMP-REG-07 with PF/ESIC challans (due date, paid date, amount, proof).
- [ ] Update COMP-REG-04 with insurance policies (WC/CAR/third-party) and validity.
- [ ] Coordinate with ACC-H/HR for employee PF/ESIC and with contractors for contract labour PF/ESIC.
- [ ] Apply compliance gate: do not recommend payment if statutory proofs are missing (as per policy).
- [ ] Run quarterly compliance audit for PF/ESIC/insurance proofs and close gaps with CAPA.

### Outputs / Evidence:

- PF/ESIC and insurance proofs available for audits
- Payment compliance gate enforced (reduced liability)

**Registers / Formats used:** COMP-REG-07, COMP-REG-04 | COMP-FMT-18

### Escalations:

- Contractor refusing to submit PF/ESIC proofs -> escalate to PM-HO within 48 hrs; consider hold/payment stop.

## COMP SOP-06: BOCW & Welfare Compliance (Where Applicable)

**Objective:** Maintain BOCW and labour welfare compliance file and track cess/registration obligations.

**Trigger / Frequency:** Monthly review; payment/filing as per project milestones.

### Inputs:

- Project cost statements, labour deployment info
- BOCW registration/cess rules applicable to the project
- Challans/receipts and welfare board correspondence

### Step-by-step:

- [ ] Confirm BOCW applicability at project start with ACC-H/Legal and record in COMP-REG-08.
- [ ] Track cess liabilities and due dates; keep challan proofs and acknowledgements.
- [ ] Maintain welfare measures evidence (where required) such as drinking water, toilets, first aid, crèche (as applicable).
- [ ] During audits/inspections, provide BOCW file promptly and record visit in COMP-REG-10.
- [ ] Escalate if cess liability is overdue or if notice received.

### Outputs / Evidence:

- BOCW compliance file with challans and welfare evidence
- Reduced risk of penalties/notices

**Registers / Formats used:** COMP-REG-08, COMP-REG-10 | COMP-FMT-01

### Escalations:

- BOCW notice or cess overdue -> escalate to ACC-H + PM-HO same day.

## COMP SOP-07: Site Statutory Display Boards & Notice Compliance

**Objective:** Ensure mandatory site display boards/notices are installed, updated and photographed as evidence.

**Trigger / Frequency:** Monthly check and whenever site stage changes.

**Inputs:**

- List of mandatory display boards (safety, labour, emergency contacts, licenses, permits)
- Site entry location and display points
- Updated contacts and approvals

**Step-by-step:**

- [ ] Use COMP-REG-09 checklist monthly for each site.
- [ ] Verify emergency contact numbers, project details, permits displayed and updated.
- [ ] Take dated photos and file in project compliance folder; reference in COMP-REG-09.
- [ ] Rectify missing/incorrect boards within 48 hrs and re-verify.
- [ ] Include status in monthly MIS (COMP-FMT-01).

**Outputs / Evidence:**

- All required boards displayed with photo evidence
- Reduced inspection risk

**Registers / Formats used:** COMP-REG-09 | COMP-FMT-04, COMP-FMT-01

**Escalations:**

- Authority visit expected/ongoing and boards missing -> escalate to PM-S immediately; rectify same day.

## COMP SOP-08: Statutory Inspection / Authority Visit Handling

**Objective:** Handle any authority visit professionally, provide correct documents, and ensure closure of observations.

**Trigger / Frequency:** As needed (any authority visit).

### Inputs:

- Authority name and purpose of visit
- Inspection checklist and required documents file
- Contact list (PM-S, PM-HO, Legal Officer, ACC-H)

### Step-by-step:

- [ ] Inform PM-S immediately and PM-HO within 2 hrs (same day for compliance risk) as per matrix.
- [ ] Use COMP-FMT-05 response pack: designate escort, meeting place, document file readiness.
- [ ] Record visit details in COMP-REG-10 including documents shown and officer remarks.
- [ ] If any written observation/notice is issued, record in COMP-REG-11 and initiate reply SOP-10.
- [ ] Prepare action plan with owners and closure dates; track in COMP-REG-12/17.

### Outputs / Evidence:

- Inspection register + evidence file
- Observation closure with proof

**Registers / Formats used:** COMP-REG-10, COMP-REG-11, COMP-REG-17 | COMP-FMT-05

### Escalations:

- Any inspection with penalty threat / stop-work risk -> PM-HO same day, OWN within 48 hrs (through PM-HO).

## COMP SOP-09: Audit Preparation, Audit Execution & Closure

**Objective:** Keep projects audit-ready; close audit observations with written CAPA and evidence.

**Trigger / Frequency:** Monthly internal audit; quarterly management review; external audit as scheduled.

### Inputs:

- Compliance registers, certificates, challans, photos
- Previous audit observations and closure status
- Audit scope (labour, finance, safety, environment)

### Step-by-step:

- [ ] Use COMP-FMT-06 checklist to prepare audit file (by site and by category).
- [ ] During audit, record each observation with severity and owner in COMP-REG-12.
- [ ] For each observation, prepare CAPA plan using COMP-FMT-07 and get PM-HO approval for timelines.
- [ ] Follow-up weekly until closure; file evidence and mark closed in COMP-REG-12.
- [ ] Escalate any critical non-compliance (legal/penalty risk) immediately to PM-HO.

### Outputs / Evidence:

- Audit file + observation register + closure proofs
- Improving compliance score trend

**Registers / Formats used:** COMP-REG-12, COMP-REG-17, COMP-REG-19 | COMP-FMT-06, COMP-FMT-07

### Escalations:

- Critical audit observation not closed within agreed timeline -> escalate to PM-HO within 24 hrs.

## COMP SOP-10: Statutory Notice / Show Cause Handling & Reply Coordination

**Objective:** Respond to notices on time with correct facts, evidence, and legal review to avoid escalation to litigation/penalties.

**Trigger / Frequency:** As needed (upon notice).

### Inputs:

- Notice copy (scan), due date for reply
- Relevant compliance documents and evidence
- Legal Officer/advocate contact and brief

### Step-by-step:

- [ ] Record notice in COMP-REG-11 on same day with due date and owner.
- [ ] Inform PM-HO same day and ACC-H/HR/Legal Officer depending on category.
- [ ] Prepare factual brief using COMP-FMT-09 and attach evidence index.
- [ ] Draft reply through Legal Officer/advocate; ensure approval trail as per authority matrix.
- [ ] Dispatch reply before due date; file dispatch proof and update status in COMP-REG-11.

### Outputs / Evidence:

- On-time notice replies with evidence file
- Reduced penalty/litigation risk

**Registers / Formats used:** COMP-REG-11, COMP-REG-20 | COMP-FMT-08, COMP-FMT-09

### Escalations:

- Any notice with hearing/penalty/stop-work risk -> escalate to PM-HO immediately; OWN within 48 hrs via PM-HO.

## COMP SOP-11: Environmental & Waste Disposal Compliance (Construction/Demolition)

**Objective:** Document waste disposal and environmental controls to avoid complaints, penalties and neighbour disputes.

**Trigger / Frequency:** Daily/weekly during demolition; weekly during construction; monthly review.

### Inputs:

- Debris/waste generation estimates
- Approved disposal vendor details and transport plan
- Site dust/noise control measures

### Step-by-step:

- Maintain COMP-REG-14 for waste disposal entries (date, quantity, vendor, manifest).
- Use COMP-FMT-14 manifest log for each major disposal trip and file receipts.
- Coordinate with PM-S and SAFE for dust suppression, covered transport and housekeeping.
- If hazardous materials suspected (asbestos etc.), stop and coordinate with specialist and legal compliance.
- Include waste and complaints status in monthly compliance MIS.

### Outputs / Evidence:

- Waste disposal evidence file and reduced complaint risk
- Cleaner site compliance record

**Registers / Formats used:** COMP-REG-14 | COMP-FMT-14, COMP-FMT-02

### Escalations:

- Neighbour complaint / municipal notice about waste or dust -> escalate to PM-S same day and PM-HO within 48 hrs.

## COMP SOP-12: Incident Statutory Reporting & Claims Support

**Objective:** Ensure any accident/incident is reported as required and insurance/ESIC/WC claims are supported with documents.

**Trigger / Frequency:** As needed (incident).

### Inputs:

- Incident report from SAFE/PM-S
- Medical records, photos, witness statements
- Insurance policy details and claim process

### Step-by-step:

- [ ] Record incident in COMP-REG-17 and link to safety incident report.
- [ ] Use COMP-FMT-13 checklist to identify statutory reporting requirements and deadlines.
- [ ] Coordinate with ACC-H/HR/Legal Officer for reporting and claim filing.
- [ ] Maintain claim intimation proof and follow-up logs; update status until closure.
- [ ] Conduct post-incident compliance review and preventive actions; file evidence.

### Outputs / Evidence:

- Incident reporting file with proofs
- Claims supported with documentation

**Registers / Formats used:** COMP-REG-17, COMP-REG-04 | COMP-FMT-13, COMP-FMT-15

### Escalations:

- Fatal/major accident -> immediate escalation to PM-S (0-30 min), PM-HO within 2 hrs, OWN same day.

## COMP SOP-13: Approvals & NOC Compliance File Control (with Liaison/Architect)

**Objective:** Maintain approvals/NOCs file and ensure remark closures are tracked with evidence and versions.

**Trigger / Frequency:** Weekly during approvals; monthly after approvals.

### Inputs:

- Submission sets, remarks letters, approval letters
- Approval tracker from liaison/architect
- Project drawings and revision logs

### Step-by-step:

- [ ] Maintain folder index in COMP-REG-20 for approvals and NOCs (fire, water, electricity, etc.).
- [ ] Track each remark/condition and closure evidence (photos, revised drawings, receipts).
- [ ] Ensure only latest approved drawings are circulated and older versions archived.
- [ ] Before applying for OC/BU/Completion, run a compliance readiness check with PM-HO.
- [ ] Escalate any approval condition that impacts cost/time.

### Outputs / Evidence:

- Approvals/NOC file with version control
- Smooth OC/Completion readiness

**Registers / Formats used:** COMP-REG-20, COMP-REG-01 | COMP-FMT-17

### Escalations:

- Approval condition missed / risk of rejection -> escalate to PM-HO within 24 hrs.

## COMP SOP-14: Training & Awareness Compliance Program

**Objective:** Run periodic compliance awareness so site teams and contractors follow mandatory rules and documentation.

**Trigger / Frequency:** Monthly training + induction for new staff/contractors.

### Inputs:

- Training calendar and topics (labour compliance, inspections, documentation)
- Attendance sheets and training materials
- Common non-compliance observations

### Step-by-step:

- [ ] Prepare monthly training plan and confirm dates with PM-S/SAFE.
- [ ] Conduct sessions and record attendance using COMP-FMT-15; update COMP-REG-13.
- [ ] Include special sessions before major inspections/audits.
- [ ] Issue action note for recurring violations; link to CAPA register.
- [ ] Report completion status in monthly MIS.

### Outputs / Evidence:

- Training records + improved compliance discipline
- Reduced repeat non-compliance

**Registers / Formats used:** COMP-REG-13, COMP-REG-17 | COMP-FMT-15, COMP-FMT-01

### Escalations:

- Repeated non-compliance despite training -> escalate to PM-HO with recommendation for penalties/actions.

## COMP SOP-15: Non-compliance CAPA Management & Escalation

**Objective:** Close non-compliances with owners, deadlines and evidence; enforce escalation if delays occur.

**Trigger / Frequency:** Ongoing; reviewed weekly.

### Inputs:

- Audit observations, site inspection findings, notices
- Owner list and target dates
- Evidence requirements

### Step-by-step:

- [ ] Log non-compliance in COMP-REG-17 with severity and target closure date.
- [ ] Assign owner and confirm action plan; attach photo/evidence requirement.
- [ ] Review weekly with PM-HO and highlight overdue items.
- [ ] Close only after evidence is filed and verified; update status and closure date.
- [ ] Escalate repeated/critical issues as per escalation matrix and recommend stop-work/hold payment where applicable.

### Outputs / Evidence:

- CAPA register with closure evidence
- Reduced repeat findings and penalties

**Registers / Formats used:** COMP-REG-17, COMP-REG-16 | COMP-FMT-07

### Escalations:

- Critical non-compliance overdue -> PM-HO within 24 hrs; OWN within 48 hrs via PM-HO.

## 4. Policies (In-depth, One-by-One) - POL-01 to POL-12

### COMP POL-01: Zero-Tolerance Statutory Compliance Policy

**Policy statement:** Any statutory expiry, notice, or critical non-compliance is treated as high risk and must be acted upon immediately with written evidence.

**Key rules:**

- No expired registrations/certificates allowed - renew before expiry.
- No hiding of notices/inspections - report same day.
- Evidence must be filed (scan/photo/challan) for every compliance action.

**Enforcement (step-by-step):**

- [ ] Compliance Officer updates COMP-REG-01 and informs PM-HO of any high-risk item.
- [ ] PM-HO assigns owner and deadline; overdue items are escalated as per matrix.
- [ ] Repeated negligence triggers disciplinary action and/or vendor blacklisting.

**Evidence to file:**

- COMP-REG-01/02 updates and proofs (certificates, challans, acknowledgement)
- Notice register and reply file
- Audit logs and CAPA closures

## COMP POL-02: Evidence & Document Retention Policy

**Policy statement:** If it is not documented, it is treated as not done. All compliance evidence must be retained in an audit-ready manner.

### Key rules:

- Maintain scanned copies for all statutory certificates, challans, notices, replies and approvals.
- Use standard file naming and folder structure; avoid personal storage.
- Retain records as per legal requirement and minimum 8 years for critical statutory documents (or as advised by Legal).

### Enforcement (step-by-step):

- Compliance Officer maintains COMP-REG-20 index and performs monthly file audits.
- Any missing evidence is treated as a compliance risk and escalated.
- Only controlled versions of approvals/drawings are circulated.

### Evidence to file:

- Document index and folder screenshots
- Monthly file audit report (part of MIS)

## COMP POL-03: Escalation & Whistleblowing for Non-compliance

**Policy statement:** All staff and contractors must report compliance risks without fear. Delayed reporting increases penalties and liability.

### Key rules:

- Report notices/inspection visits same day to PM-HO through Compliance Officer or directly if urgent.
- No retaliation for reporting genuine compliance risks.
- False reporting/malicious reporting will be treated as misconduct.

### Enforcement (step-by-step):

- [ ] Use escalation message format for clarity and evidence.
- [ ] PM-HO reviews and closes escalations with documented actions.
- [ ] Owner/Chairman decision required for high-severity legal risks.

### Evidence to file:

- Escalation emails/ERP notes with evidence attachments
- Closure notes and approvals trail

## COMP POL-04: Contractor & Vendor Compliance Policy

**Policy statement:** No contractor/vendor engagement continues without minimum statutory compliance documents and valid insurance.

**Key rules:**

- Vendor onboarding must include KYC + GST + bank + compliance documents.
- Labour contractors must provide labour license (where required), PF/ESIC proofs and wage payment proofs.
- High-risk contractors must comply with safety and permits before work starts.

**Enforcement (step-by-step):**

- [ ] Purchase Manager and PM-HO enforce onboarding gates; Compliance Officer audits the pack.
- [ ] Non-compliant vendors are put on hold until closure; repeat offenders may be blacklisted.

**Evidence to file:**

- Vendor compliance register and onboarding checklist
- Insurance policies and renewal proofs

## COMP POL-05: Payment Compliance Gate Policy

**Policy statement:** Payments are released only when statutory and contractual compliance conditions are satisfied and evidenced.

### Key rules:

- No payment for manpower contractors without wage/PF/ESIC proof (where applicable).
- No payment if insurance/permits are expired for high-risk scopes.
- Exceptions require written deviation approval with risk acceptance.

### Enforcement (step-by-step):

- [ ] Accounts validates payment pack; Compliance Officer verifies compliance docs.
- [ ] Deviation approval note (COMP-FMT-12) must be approved as per authority matrix.

### Evidence to file:

- Payment pack checklist + compliance documents
- Deviation approval note and approvals trail

## **COMP POL-06: Labour Welfare, Ethical Conduct & Anti-Child Labour Policy**

**Policy statement:** Swara maintains ethical labour practices: no child labour, fair wages, safe working conditions and humane welfare.

### **Key rules:**

- No worker below legal working age; verify IDs for all workers.
- Basic welfare facilities as required (water, toilets, first aid); record evidence.
- Grievances must be logged and addressed without retaliation.

### **Enforcement (step-by-step):**

- [ ] Compliance Officer and PM-S conduct surprise checks and record in registers.
- [ ] Violations trigger immediate removal from site and contractor penalty.

### **Evidence to file:**

- Worker ID register and welfare check photos
- Grievance/complaint logs and closures

## COMP POL-07: Audit & Inspection Readiness Policy

**Policy statement:** Projects must be inspection-ready at all times; audits are treated as routine, not events.

**Key rules:**

- Maintain updated compliance files and registers; no back-dated entries.
- Display boards and permits must be visible and updated.
- Audit observations must have owners and closure evidence.

**Enforcement (step-by-step):**

- Monthly internal compliance audits and scorecards.
- PM-HO reviews high-risk audit findings weekly until closure.

**Evidence to file:**

- Audit checklist and observation register
- Scorecard trend reports

## **COMP POL-08: Training & Competency Policy (Compliance Documentation)**

**Policy statement:** Teams must understand compliance documentation and inspection behaviour to avoid costly errors.

### **Key rules:**

- Monthly compliance awareness sessions for site leadership and contractors.
- Induction includes compliance basics (documents, boards, inspections, reporting).
- Training attendance must be recorded.

### **Enforcement (step-by-step):**

- [ ] Compliance Officer maintains training register and reports completion in MIS.
- [ ] Repeat non-compliance triggers re-training and disciplinary actions.

### **Evidence to file:**

- Attendance sheets and training photos/materials
- Training register

## **COMP POL-09: Regulatory Communication Policy (Single Point of Contact)**

**Policy statement:** External communication with authorities must be controlled to prevent inconsistent statements and legal risk.

### **Key rules:**

- Only nominated persons (PM-HO/Compliance Officer/Legal Officer) speak to authorities for official matters.
- No written reply is sent without legal review if there is penalty/legal risk.
- All communications must be logged and filed.

### **Enforcement (step-by-step):**

- [ ] Maintain authority visit register and notice register.
- [ ] Escalate any authority communication received by site staff to Compliance Officer same day.

### **Evidence to file:**

- Visit logs, notice logs, email/dispatch proofs

## **COMP POL-10: ERP/Record Integrity Policy (Maker-Checker)**

**Policy statement:** Compliance records must match approvals and payments in ERP; manipulation or mismatch is treated as misconduct.

### **Key rules:**

- All approvals must be in writing (ERP/email) and attached where required.
- Maker-checker principle for critical records and payments.
- Quarterly access and record review with IT/ERP Coordinator.

### **Enforcement (step-by-step):**

- Compliance Officer flags mismatches to PM-HO and IT/ERP Coordinator.
- Critical issues are escalated to Owner as per matrix.

### **Evidence to file:**

- ERP approval trails and access logs
- Mismatch tracker and closures

## COMP POL-11: Penalty & Disciplinary Policy for Compliance Violations

**Policy statement:** Non-compliance has costs. Repeated or deliberate violations lead to penalties, holds, or disciplinary actions.

### Key rules:

- Repeat non-compliance by contractor triggers warning -> penalty -> termination/blacklisting.
- Internal negligence is handled via HR discipline process with documented evidence.
- Any attempt to hide notices or falsify records is major misconduct.

### Enforcement (step-by-step):

- [ ] PM-HO and HR execute disciplinary actions; Legal consulted where needed.
- [ ] Compliance Officer provides evidence pack and incident timeline.

### Evidence to file:

- Warning letters, penalty notes, closure proof
- HR disciplinary documentation

## COMP POL-12: Continuous Improvement & Review Policy

**Policy statement:** Compliance system must improve every quarter based on audits, incidents and regulatory changes.

**Key rules:**

- Quarterly compliance review meeting with PM-HO/ACC-H/HR/Legal.
- Update SOPs, registers and formats with version control.
- Track key metrics: overdue items, audit closures, notices, penalties.

**Enforcement (step-by-step):**

- Compliance Officer issues quarterly review minutes and action plan.
- Revised documents are released only after approval and staff acknowledgement.

**Evidence to file:**

- Quarterly review minutes and updated versions list

# 5. Registers (One-by-One) - REG-01 to REG-20

## COMP REG-01: Compliance Calendar & Due Dates Tracker

**Purpose:** Track all compliance items with owners, due dates and evidence references.

**Update frequency:** Weekly review; update ongoing.

**Template (print-ready):**

Due Date	Compliance item	Authority	Owner	Status	Evidence ref	Remarks

**COMP REG-02: Statutory Registrations / Certificates Master Register**

**Purpose:** Maintain a master list of registrations/certificates with validity and renewal tracking.

**Update frequency:** Monthly; update on any renewal/change.

**Template (print-ready):**

License/Reg	Authority	Reg No	Issue date	Expiry	Owner	Evidence	Remarks

### COMP REG-03: Contractor Labour License & Renewals Register

**Purpose:** Track labour contractor licenses (where applicable) and renewals by site.

**Update frequency:** Monthly; before mobilization.

**Template (print-ready):**

Contractor	License type	License No	Valid from	Expiry	Site	Owner	Remarks

**COMP REG-04: Insurance Register (WC/CAR/Third Party)**

**Purpose:** Track insurance policies and validity for contractors and project.

**Update frequency:** Monthly; before high-risk works and payments.

**Template (print-ready):**

Contractor/Vendor	Insurance type	Policy No	Valid to	Sum insured	Site	Evidence	Remarks

### COMP REG-05: Site Labour Attendance & ID Proof Register

**Purpose:** Record worker attendance/identity to reduce dispute and child-labour risk.

**Update frequency:** Daily / ongoing

**Template (print-ready):**

Date	Worker name	Contractor	Trade	ID proof	Site	Signature	Remarks

### COMP REG-06: Wage Payment / Bank Transfer Proof Register

**Purpose:** Maintain wage payment proof record for contractors/manpower on site.

**Update frequency:** Monthly

**Template (print-ready):**

Month	Contractor	No. workers	Wage paid date	Mode	Proof ref	Verified by	Remarks

### COMP REG-07: PF/ESIC Challan Tracker

**Purpose:** Track PF/ESIC filings/challans and payment proofs for employees/contractors as applicable.

**Update frequency:** Monthly

**Template (print-ready):**

Month	PF challan ref	ESIC challan ref	Due date	Paid date	Amount	Proof	Remarks

### COMP REG-08: BOCW Compliance & Cess Tracker

**Purpose:** Track BOCW registration/cess liabilities, payments and correspondence (where applicable).

**Update frequency:** Monthly

**Template (print-ready):**

Site	BOCW reg no	Cess %	Amount	Due date	Paid date	Challan ref	Remarks

### COMP REG-09: Statutory Display Board Checklist (Monthly)

**Purpose:** Ensure mandatory display boards/notices are installed and updated with photo evidence.

**Update frequency:** Monthly

**Template (print-ready):**

Month	Site	Board/Notice item	Available (Y/N)	Updated by	Photo ref	Remarks

### COMP REG-10: Authority Visit / Inspection Register

**Purpose:** Log any authority visit/inspection with observations and closure actions.

**Update frequency:** As needed

**Template (print-ready):**

Date	Authority/Dept	Purpose	Site	Documents shown	Observations	Action owner	Closure date

### COMP REG-11: Statutory Notices Register

**Purpose:** Track notices, due dates, actions, replies and closure proofs.

**Update frequency:** As needed; reviewed weekly

**Template (print-ready):**

Date received	Notice type	Authority	Subject	Reply due	Owner	Status	Closure proof

### COMP REG-12: Audit Observations & Closure Register

**Purpose:** Record audit findings and closure evidence with owners and deadlines.

**Update frequency:** Monthly/Quarterly

**Template (print-ready):**

Audit date	Auditor	Observation	Severity	Owner	Target date	Status	Closure evidence

### COMP REG-13: Training & Awareness Register (Compliance)

**Purpose:** Record compliance training sessions, attendance and topics.

**Update frequency:** Monthly

**Template (print-ready):**

Date	Training topic	Trainer	Audience	No. attendees	Site/HO	Attendance ref	Remarks

### COMP REG-14: Environment & Waste Disposal Register

**Purpose:** Record waste disposal and environmental compliance actions with evidence.

**Update frequency:** Weekly / ongoing

**Template (print-ready):**

Date	Waste type	Quantity	Vendor/Transporter	Disposal location	Manifest ref	Site	Remarks

### COMP REG-15: Vendor Compliance Document Register

**Purpose:** Track vendor KYC/GST/compliance documents and validity.

**Update frequency:** Quarterly refresh; update ongoing

**Template (print-ready):**

Vendor	GST/PAN	Compliance docs	Received date	Valid up to	Owner	Status	Remarks

### COMP REG-16: Compliance Risk Register

**Purpose:** Maintain risk log with rating and mitigation plan for compliance items.

**Update frequency:** Monthly review

**Template (print-ready):**

Risk	Category	Likelihood	Impact	Rating	Mitigation action	Owner	Review date

**COMP REG-17: CAPA Register (Non-compliance Corrective Actions)**

**Purpose:** Track non-compliance, corrective actions, owners, deadlines and closure evidence.

**Update frequency:** Weekly review; ongoing updates

**Template (print-ready):**

Non-compliance	Date	Site	Action required	Owner	Target date	Status	Closure evidence

### COMP REG-18: Legal Case / Complaint Support Register

**Purpose:** Track complaints/cases for coordination with Legal Officer and management.

**Update frequency:** As needed

**Template (print-ready):**

Case/Complaint	Date	Party	Issue	Status	Owner	Next due/hearing	Remarks

### COMP REG-19: Site Compliance Scorecard (Weekly)

**Purpose:** Weekly scorecard to drive discipline and highlight top issues per site.

**Update frequency:** Weekly

**Template (print-ready):**

Week	Site	Score (%)	Top issues	Owner	Action plan ref	Next review	Remarks

### COMP REG-20: Document Handover & Record Retention Index

**Purpose:** Index all compliance documents and handover package; maintain retention plan.

**Update frequency:** Monthly; at project close-out

**Template (print-ready):**

Document	Owner	Location	Retention period	Handover date	Received by	Scan ref	Remarks

## 6. Formats & Templates (One-by-One) - FMT-01 to FMT-18

### COMP FMT-01: Monthly Compliance MIS Report

**Use:** Submit once per month to PM-HO (copy ACC-H/HR) with top risks and overdue items.

**Template fields / structure:**

Field	Fill
Reporting month	
Project/Site	
Overdue compliance items (with due dates)	
New notices/inspections (summary)	
Audit status (open/closed observations)	
Top 5 compliance risks (with mitigation)	
Decisions required from management	
Prepared by / reviewed by	

### COMP FMT-02: Weekly Site Compliance Checklist

**Use:** Weekly on each site - verify display boards, labour docs, waste disposal, insurance validity, registers updated.

**Template fields / structure:**

Field	Fill
Week / Date	
Site name/code	
Display boards updated (Y/N) + photo ref	
Labour attendance register updated (Y/N)	
Wage payment proof status (Y/N/NA)	
PF/ESIC proof status (Y/N/NA)	
Waste disposal records updated (Y/N)	
Open issues / actions required	
Checked by / Approved by	

### COMP FMT-03: Contractor Onboarding Compliance Checklist

**Use:** Use before issuing first PO/WO and before site mobilization.

**Template fields / structure:**

Field	Fill
Vendor/Contractor name	
Scope of work	
GST/PAN + bank details received (Y/N)	
Insurance policy received and valid (Y/N)	
Labour license (if applicable) received (Y/N/NA)	
PF/ESIC details received (Y/N/NA)	
Safety compliance acceptance (Y/N)	
Documents filed location / reference	
Compliance Officer sign-off	

### COMP FMT-04: Statutory Display Board List (One-page)

**Use:** Print and keep near site entry; tick off installed boards and update monthly.

**Template fields / structure:**

Field	Fill
Site name/code	
Emergency contact board	
Safety PPE board	
Labour welfare board	
Permits/licences display (where applicable)	
Project details board	
Other statutory notices (local authority)	
Last updated date / Updated by	

### COMP FMT-05: Authority Visit Response Pack (Checklist)

Use: Keep ready at site for any authority inspection/visit.

Template fields / structure:

Field	Fill
Authority/department	
Purpose of visit	
Escort person (PM-S/Compliance/SSE)	
Documents file checklist (licenses, registers, insurance, approvals)	
Meeting minutes/notes	
Documents handed over (if any)	
Observations/actions	
Escalation sent to PM-HO (Y/N) + ref	

### COMP FMT-06: Audit Preparation Checklist

**Use:** Pre-audit checklist to ensure documents and registers are updated and accessible.

**Template fields / structure:**

Field	Fill
Audit date / Auditor	
Scope (labour/safety/environment/finance)	
Certificates and renewals file updated (Y/N)	
Registers updated and signed (Y/N)	
Display boards verified (Y/N) + photo ref	
PF/ESIC/insurance proofs compiled (Y/N)	
Previous audit closures verified (Y/N)	
Ready for audit - sign-off	

### COMP FMT-07: Audit Response & Closure Plan (CAPA)

**Use:** For each audit finding - create action plan with owners and closure evidence.

**Template fields / structure:**

Field	Fill
Observation reference	
Severity (Low/Med/High)	
Root cause	
Corrective action	
Preventive action	
Owner	
Target date	
Evidence required	
Closure verified by	

### COMP FMT-08: Notice Acknowledgement Email/Letter Template

**Use:** Send acknowledgement to authority and internally record receipt and due date.

**Template fields / structure:**

Field	Fill
Notice reference	
Date received	
Reply due date	
Acknowledgement sent date	
Sent by	
Internal escalation reference	
Attachments list	

### COMP FMT-09: Legal Brief Note to Advocate (For Reply)

**Use:** Prepare factual brief for advocate with evidence index and approvals trail.

**Template fields / structure:**

Field	Fill
Notice/case reference	
Background facts (timeline)	
Key allegations/points	
Swara position (facts only)	
Evidence list (documents/photos/challans)	
Desired outcome/relief	
Contact persons	
Approval required and deadline	

### COMP FMT-10: Statutory Document Request Letter to Contractor

**Use:** Formal request to contractor/vendor for missing/expired statutory documents.

**Template fields / structure:**

Field	Fill
Contractor name	
Documents required	
Due date for submission	
Consequences (hold payment/stop mobilization)	
Compliance Officer contact	
Acknowledgement (contractor sign/date)	

### COMP FMT-11: Non-compliance Notice to Contractor (Warning)

**Use:** Issue warning for repeated non-compliance with deadline and penalty reference.

**Template fields / structure:**

Field	Fill
Contractor name	
Non-compliance description	
Reference register/observation	
Deadline for closure	
Penalty/hold action (if applicable)	
Issued by / Approved by	
Closure evidence required	

### COMP FMT-12: Compliance Deviation Approval Note (Risk Acceptance)

**Use:** Use only when an exception is unavoidable; must have approvals trail as per authority matrix.

**Template fields / structure:**

Field	Fill
Deviation description	
Why deviation is required	
Risk assessment (impact/cost/penalty)	
Mitigation actions	
Validity period for deviation	
Approvals (names + dates)	
Evidence attached	

### COMP FMT-13: Incident Statutory Reporting Checklist

**Use:** Checklist for reporting accidents/incidents and initiating claims support.

**Template fields / structure:**

Field	Fill
Incident date/time	
Site and location	
Injured person details	
Immediate actions taken	
Reporting required (authority/ESIC/insurance) - tick	
Deadlines	
Documents attached	
Escalation reference	

### COMP FMT-14: Waste Disposal Manifest Log Template

**Use:** Attach with disposal receipts; helps in inspections and neighbour complaints.

**Template fields / structure:**

Field	Fill
Date	
Waste type and quantity	
Transporter/vehicle number	
Disposal location	
Receipt/manifest number	
Site in-charge verification	
Photos attached (Y/N)	

### COMP FMT-15: Training Session Attendance Sheet (Compliance)

**Use:** Record attendance and topics for compliance sessions and inductions.

**Template fields / structure:**

Field	Fill
Date	
Topic	
Trainer	
Site/HO	
Participant name	
Designation/Trade	
Signature	
Remarks	

### COMP FMT-16: Quarterly Compliance Review Minutes

**Use:** Minutes format for quarterly compliance review with action plan and owners.

**Template fields / structure:**

Field	Fill
Meeting date	
Attendees	
Key updates (laws/authority changes)	
Overdue items summary	
Notices/inspections summary	
Audit findings summary	
Decisions and approvals	
Action list (owner + target date)	
Next review date	

### COMP FMT-17: Compliance Handover Checklist (Project Close-out)

**Use:** Use at completion/handover to ensure all compliance documents are transferred and indexed.

**Template fields / structure:**

Field	Fill
Project name/code	
Approvals/OC/BU documents file complete (Y/N)	
Statutory registers closed and archived (Y/N)	
Notices/cases status (open/closed)	
Warranty/AMC documents filed	
Society handover package prepared	
Handover date and sign-off	

### COMP FMT-18: Vendor Compliance Scorecard Format

**Use:** Quarterly scorecard to rank vendors/contractors on compliance and discipline.

**Template fields / structure:**

Field	Fill
Vendor/Contractor	
Document completeness (%)	
On-time submissions	
PF/ESIC/insurance compliance	
Safety/compliance incidents	
Audit findings count	
Overall rating	
Decision (continue/hold/blacklist)	

# Appendix A: Quick Reference - Authority limits & escalation triggers

Use this section as your default escalation discipline. Always attach evidence and ask for a clear decision.

**Non-negotiable rule:** If approval is not in writing (ERP/email/WhatsApp screenshot attached), it is treated as NOT approved.

## A1. Common compliance escalation triggers

- Statutory certificate expiring within 7 days with no renewal action started.
- Any statutory notice, show cause, audit objection, inspection memo or penalty hint.
- Any fatal/major accident with potential statutory reporting and insurance claim impact.
- Wage non-payment complaint or labour unrest signal on site.
- Repeated non-compliance by contractor (documents missing despite reminders).

## A2. Escalation ladder (typical)

- Site issue -> PM-S (same day) + Compliance Officer logs and supports.
- Compliance risk -> PM-HO within 48 hrs (same day for notice/penalty risk).
- Critical compliance/legal risk -> OWN within 48 hrs through PM-HO (or same day if severe).

## A3. Mandatory escalation message format (copy-paste)

- **Subject:** [COMPLIANCE] Site/Project - Issue - Decision required by (date/time)
- **1) What happened:** (facts only, 3-5 lines)
- **2) Risk/impact:** (penalty / stop-work / cost / timeline / reputation)
- **3) Evidence attached:** (photos / notice copy / challans / registers ref)
- **4) Options:** (Option A/B with time & cost)
- **5) My recommendation:** (clear recommendation)
- **6) Decision required:** (approve action / budget / advocate / stop-work etc.)

## Appendix B: 30-60-90 day onboarding plan (COMP)

Use this plan when a new Compliance Officer joins or when a project starts fresh.

### First 30 days (Foundation)

- Collect all existing compliance documents and create master index (COMP-REG-20).
- Set up compliance calendar (COMP-REG-01) and statutory register master (COMP-REG-02).
- Baseline vendor/contractor compliance packs and identify missing/expired documents.
- Run first site compliance walk with PM-S + SAFE; start weekly checklist (COMP-FMT-02).
- Create notice register and escalation discipline - no hidden issues.

### Day 31-60 (Stabilize)

- Implement payment compliance gate checks with Accounts and Purchase (POL-05).
- Run first internal compliance audit and start closure register (COMP-REG-12/17).
- Standardize statutory display boards and evidence photos across sites (COMP-REG-09).
- Launch monthly training and awareness sessions; record attendance (COMP-REG-13).

### Day 61-90 (Mature & Improve)

- Publish monthly MIS and compliance scorecard trend; drive improvements site-wise.
- Do quarterly compliance review with PM-HO/ACC-H/HR/Legal; update SOPs with version control.
- Vendor scorecard and blacklisting process for repeat non-compliance (FMT-18).
- Close all high-severity observations; keep project inspection-ready always.