

## Human Rights Policy

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### Document Update Summary

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V 1.0	NA	New Document	31-December-2025
V 1.1	31 July 2025	Grievance Officer Updated	31- July - 2026

### 1. Objective

At Attero Recycling Private Limited (“**Attero/Company**”), Attero is committed to respecting, protecting, and promoting human rights in all aspects of our operations and business relationships in accordance with the Constitution of India, the latest labor laws, and international human rights standards, including the Universal Declaration of Human Rights (UDHR) and the International Labour Organization (ILO) Conventions. This human rights policy (“**policy**”) reflects Attero’s dedication to respecting the dignity, equality, and rights of all individuals impacted by its business, including employees, contractors, suppliers, and the communities they serve.

### 2. Applicability and Scope

This policy applies to all employees, contractors, suppliers, business partners, and stakeholders associated with Attero. The policy encompasses all business activities, including recruitment, operations, procurement, tie-ups and partnerships, across all geographies where Attero operates.

### 3. Eligibility

The following are eligible and responsible for adherence to this policy:

- 3.1. **Employees:** To act in accordance with the principles of this policy and report any human rights concerns.
- 3.2. **Suppliers and Contractors:** To comply with Attero's Supplier Code of Conduct, ensuring that their practices align with this policy.
- 3.3. **Management:** To implement, monitor, and ensure compliance with the policy.
- 3.4. **Stakeholders:** To engage respectfully and responsibly with Attero in projects and initiatives.

#### 4. Policy Framework

##### 4.1. Respect for Human Rights

- Attero respects and supports fundamental human rights as defined by the **National Human Rights Commission (NHRC)** and **State Human Rights Commissions, UDHR** and **UNGPs**.
- We prohibit all forms of forced labor, child labor, discrimination, and harassment.
- We ensure that employees work in safe and healthy environments. We value and respect the unique individuality and cultural backgrounds of all our employees. We expect all team members, including managers, to foster an inclusive and respectful environment where everyone feels comfortable and valued, regardless of their personal or cultural differences.

##### 4.2. Non-Discrimination and Equal Opportunity

- We promote diversity and inclusivity in our workforce, ensuring equal opportunity for all irrespective of race, color, gender, religion, age, disability, or any legally protected characteristic.
- Recruitment, promotions, and all employment practices are based solely on merit and qualifications.
- We adhere to the **Equal Remuneration Act, 1976** and **Code on Wages, 2019** for fair and equal pay practices.

##### 4.3. Freedom from Forced and Child Labor

- We prohibit all forms of forced labor, bonded labor, and child labor in line with the **Child Labour (Prohibition and Regulation) Act, 1986** and international conventions.
- Company does not employ minors or children in any part of its business and strives to ensure that it does not practice child labor in any form in their supply chains and business operations.

##### 4.4. Fair Wages and Working Conditions

- We guarantee fair wages, working hours, and a safe and healthy working environment as mandated by the **Code on Wages, 2019** and the **Factories Act, 1948**. The Company ensures that all employees receive equal pay for equal work, regardless of gender, race, ethnicity, religion, or any other protected characteristic.

#### 4.5. **Freedom of Association and Collective Bargaining**

- We recognize and respect the rights of employees to associate freely and to bargain collectively, in compliance with applicable laws.

#### 4.6. **Diversity and Inclusion**

- We promote a culture of inclusion by implementing the **Equal Opportunity Policy** for individuals with disabilities as per the **Rights of Persons with Disabilities Act, 2016**.
- We foster gender equality and prevent workplace discrimination. The Company has a zero-tolerance policy for all forms of gender-based discrimination and harassment, including sexual harassment

#### 4.7. **Workplace Safety and Well-being**

- We are committed to maintaining a safe, healthy, and secure workplace.
- We provide adequate training, equipment, and protocols to ensure the safety of all employees.
- We provide a workplace free from hazards, in compliance with the **Occupational Safety, Health, and Working Conditions Code, 2020**.
- Ensure access to grievance mechanisms for workplace safety concerns.

#### 4.8. **Grievance Mechanisms**

- Attero provides a confidential and accessible grievance mechanism to enable individuals, including employees, stakeholders, and members of the affected communities, to raise concerns related to potential or actual human rights impacts arising from Attero's operations.

#### 4.9. **Community Engagement**

- Attero respects the rights and culture of communities impacted by its operations.
- Attero actively engages with local stakeholders to address concerns and contribute positively to community development.

#### 4.10. **Monitoring and Reporting**

- The HR and Compliance teams will regularly monitor human rights performance and report findings to senior management.
- Annual reviews will ensure the policy remains relevant and effective.

#### 4.11. **Grievance Reporting Mechanism**

Employees and stakeholders can report concerns to:

**Grievance Officer:** Purna Sharma at [grievance@attero.in](mailto:grievance@attero.in)

Reports will be handled promptly and confidentially, with appropriate action taken to address substantiated claims.