

# **REPORTING REQUIREMENTS**

**FOR COPs 6 & 7**

**ATTERO RECYCLING PRIVATE  
LIMITED**

## **COP 6 & 7: HUMAN RIGHTS & DUE DILIGENCE**

### **CONTACT INFORMATION**

**COMPANY NAME:** ATTERO RECYCLING PRIVATE LIMITED

**DATE:** 04.04.2025

**REPORTING PERIOD:** April 24 to March 25

**CONTACT:** info@attero.in

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### **COMPANY MANAGEMENT SYSTEMS**

ATTERO RECYCLING PRIVATE LIMITED have the following policies in place, detailing our commitment to respect human rights throughout our supply chain and our supply chain due diligence on the following minerals [Gold, Silver and other Pricious Metals] originating from conflict-affected and high-risk areas. ATTERO RECYCLING PRIVATE LIMITED endorse these policies to our suppliers and stakeholders by distributing them via Email, these policies can also be accessed by our internal stakeholders via notice board display & contact compliance manager and externally via Email & Website.

#### **Reference Document:**

RESPONSIBLE PERSON NAME & DESIGNATION		Mr. Pawandeep Singh (Vice President)		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	ARPL-POL-16	Policy Statement of RJC Compliance	Jan-2025	Jan-2026
2	ARPL-POL-07	Policy Statement of Human Rights	Jan-2025	July-2025
3	ARPL-POL-15	Policy Statement of Supply Chain	Jan-2025	Jan-2026

## COMPANY IMPLEMENTED SYSTEM

### A. Supply Chain Due diligence:

To support supply chain due diligence, we have implemented the following internal measures:

1. Appointment of Senior Manager – Mr. Pawandeep Singh (Vice President) is responsible for overseeing supply chain due diligence.
2. Establishment and implementation of Human rights and Supply chain policy.
3. Mrs. Anushree, Senior manager is responsible for the same.
4. Conducting Human right due diligence review once in six months to identify and mitigate human rights risk in our products and services.
5. Communication of human rights system to stakeholders and suppliers through Email.

#### **Reference Document:**

RESPONSIBLE PERSON NAME & DESIGNATION		Mr. Pawandeep Singh (Vice President)		
S. N O	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	ARPL-AML-01	Appointment order of Senior Manager	Jan-2025	-
2	ARPL-POL-07	Policy Statement of Human Rights	Jan-2025	July-2025
3	ARPL-POL-15	Policy Statement of Supply Chain	Jan-2025	Jan-2026
4	ARPL-HRT-08	Human rights Due diligence	Jan-2025	July-2025

## B. Supply Chain Transparency Control

**ATTERO RECYCLING PRIVATE LIMITED** have established a system of controls and transparency over our supply chain, which include our approach for identifying suppliers and identifying sources of our materials.

1. The company shall deal in sales of Gold, Silver and other Pricious Metlas that are fully compliant with Legal Requirements.
2. The company shall ensure that all of its respective activities are in line with the OECD Due Diligence Guidelines, The Responsible Jewellery Council Standard and as per Universal Declaration on Human Rights laid down by United Nations.
3. Relevant Employees shall be trained on the Supply Chain & Due Diligence Requirement and OECD guideline at regular interval. We shall also provide support to our business partners and stakeholder for the same.
4. The company shall carry out risk assessment for its supply chain and shall not enter into any business relationship or if may require then shall suspend/discontinue the engagement with any such supplier involved in dealing with Conflict-Affected and High-Risk areas.
5. The company shall verify counterparty details, including the Know Your Supplier (KYS) for any precious metals supplying Counterparties at regular interval.
6. As a company we communicate our expectations regarding human rights and supply chain due diligence by through Email at frequent intervals. In addition to this, we also take following steps to strengthen our engagement with suppliers; Conducting due diligence on human rights at 6 months once to achieve continual improvement.

### **Reference Document:**

RESPONSIBLE PERSON NAME & DESIGNATION		Mr. Pawandeep Singh (Vice President)		
S. NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	ARPL-CRA-001	Due Diligence procedure	Jan-2025	Jan-2026
2	ARPL-CRA-003	Due diligence Responsible sourcing	Jan-2025	Jan-2026
3	ARPL-ARN-001	Annual reporting Responsible sourcing	April-2025	April-2026

### C. Grievance Mechanism

Our grievance mechanism for internal stakeholders can be accessed via contacting senior manager, grievance register and suggestion box. Our external grievance mechanism is available via Email to [info@attero.in](mailto:info@attero.in) . 0 grievances received in the year April 2024 to March-2025. The employee responsible for these grievance mechanism(s) is Mr. Pawandeep Singh (Vice President).

The purpose of this Grievance mechanism is to outline a process through which any stakeholder can understand due diligence and supply chain integrity policy of the organization. The identity of the person who so ever has registered a concern shall be kept confidential and no retaliatory action shall be taken against any whistle blower. For anonymous submissions, you may refrain to provide your contact information.

Please share your Complaint/Grievance/Suggestion on [info@attero.in](mailto:info@attero.in)

**MR. PAWANDEEP SINGH** is responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via email or telephone to:

<b>Name</b>	MR. PAWANDEEP SINGH
<b>Mobile phone</b>	+91 9930547498
<b>Email address</b>	info@attero.in

#### **Reference Document:**

RESPONSIBLE PERSON NAME & DESIGNATION		Mr. Pawandeep Singh (Vice President)		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	ARPL-POL-15	Policy Statement of Supply Chain	Jan-2025	Jan-2026
2	ARPL-CRA-12	CAHRA Grievance register	Monthly	-

#### D. IDENTIFIED & ASSESSED RISKS

We assess our own and supplier's due diligence practices and those relating to human rights by conducting due diligence for Human rights process.

During our assessment of our own and our supplier's due diligence practices and those relating to human rights, we identified the low risks within our supply chain. So, there is no further action required. Next assessment should be done on April-2026

**Reference Document:**

RESPONSIBLE PERSON NAME & DESIGNATION		Mr. Pawandeep Singh (Vice President)		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	ARPL-HRT-08	Human rights Due diligence	Jan-2025	July-2025
2	ARPL-HRT-007	Human rights Breach incidents register	Monthly	-

As a result of these risks being identified we have also taken the following steps to enhance our internal systems and controls:

1. Mitigation control plan is established and implemented
2. Monitoring documents is established and implemented.
3. Appointment of Responsible person for monitoring.

### E. Strategy:

Our risk assessment findings are received by Director of ATTERO RECYCLING PRIVATE LIMITED.

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan. Our risk management plan consists of the following: mitigation plan, monitoring document, responsible person for monitoring and next review date. In addition to this, we evaluated improvement of this risk after six months through due diligence process.

RESPONSIBLE PERSON NAME & DESIGNATION		Mr. Pawandeep Singh (Vice President)		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	ARPL-HRT-08	Human rights Due diligence	Jan-2025	July-2025
2	ARPL-HRT-007	Human rights Breach incidents register	Monthly	-
3	ARPL-CRA-001	Due diligence Responsible sourcing	Jan-2025	Jan-2026
4	ARPL-ARN-001	Annual reporting Responsible sourcing	April-2025	April-2026

### F. Training and Capacity Building:

ATTERO RECYCLING PRIVATE LIMITED have provided the training regarding human rights and other RJC requirements to our employees on Feb-2025 this training included information on human rights process in our organization. We have also provided training regarding our due diligence activities to all of our employees on same date; this training included information on due diligence process in our organization.

RESPONSIBLE PERSON NAME & DESIGNATION		Mr. Pawandeep Singh (Vice President)		
S.NO	REF .NO	DOCUMENT NAME	TRAINING DATE	NEXT TRAINING DATE
1	ARPL-TRN-002	Training records	Feb-2025	Aug-2025

### G. Due diligence communication:

**ATTERO RECYCLING PRIVATE LIMITED** communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of Email. When a human rights risk is identified we communicate the risk and how we are addressing it to potentially affected stakeholders by Email.

Since our last report no grievances have been raised regarding human rights risks or our supply chain due diligence:

RESPONSIBLE PERSON NAME & DESIGNATION		Mr. Pawandeep Singh (Vice President)		
S.NO	REF .NO	DOCUMENT NAME	ISSUE DATE	NEXT REVIEW DATE
1	ARPL-HRT-08	Human rights Due diligence	Jan-2025	July-2025
2	ARPL-HRT-007	Human rights Breach incidents register	Monthly	-
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4	ARPL-ARN-001	Annual reporting Responsible sourcing	April-2025	April-2026

### H. Carry out a third party audit (optional information)

**ATTERO RECYCLING PRIVATE LIMITED** has joined the RJC in 2025 and has been planning to achieve certifications.

In support of our continuous improvement journey, our latest third-party RJC audit planned on within our organisation against the RJC COP 2024 on April-2025.