

# REPORTING REQUIREMENTS

FOR COPs  
6 & 7

ITALRECYCLING &  
INVESTMENT SRL



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

### Contact Information

COMPANY NAME: **ITALRECYCLING AND INVESTMENT SRL**  
DATE: **02.03.2026**  
REPORTING PERIOD: **2025**  
CONTACT: [rjc@italrecycling.com](mailto:rjc@italrecycling.com)

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### COMPANY MANAGEMENT SYSTEMS

ITALRECYCLING AND INVESTMENT SRL have the following policies in own website (<https://italrecycling.it/certificazioni/>), detailing our commitment to respect human rights throughout our supply chain and our supply chain due diligence on the following minerals gold, palladium, silver, platinum originating from conflict-affected and high-risk areas. ITALRECYCLING AND INVESTMENT SRL endorse these policies to our suppliers and stakeholders by distributing them via e-mail and website, these policies can also be accessed by our internal stakeholders via company public board and externally via and externally via website.

To support the KYC process, the company carries out appropriate checks on all business partners in accordance with internal procedures.

The senior manager responsible for overseeing supply chain due diligence is Ethics Committee.

To aid us in identifying our human rights impacts we have developed and implemented the follow systems:

- RJC\_Human\_Rights\_Due\_Diligence\_Toolkit
- Human rights risk analysis
- Human resources management procedures
- Internal audits

During these analysis no HIGH risks has been rilevated.

We have the human rights policy *POL.RJC rev. 26/02/2026* published in own website <https://italrecycling.it/certificazioni/>

The senior manager responsible for overseeing our human rights impacts is Ethics Committee.

ITALRECYCLING AND INVESTMENT SRL 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 and products with appropriate checks on all business partners in accordance with internal procedures. These methods have strengthened our due diligence efforts by through a direct and indirect approach with the supplier.

As a company we communicate our expectations regarding human rights and supply chain due diligence by sharing our company policy and asking all suppliers to sign the RJC commitment, through which they commit to uphold the company values in accordance with RJC standards.

In addition to this, we also maintain continuous and long-lasting relationships with our suppliers, creating a stable collaboration based on mutual knowledge and trust.

Our grievance mechanism for internal stakeholders can be accessed via signal box and dedicated email ([ric@italrecycling.com](mailto:ric@italrecycling.com)), our external grievance mechanism is available via web site by writing to the dedicated e-mail address. No grievances were received during the reporting period in question. The responsible for these grievance mechanism is Ethics Committee.

### IDENTIFIED & ASSESSED RISKS

We assess our own and supplier's due diligence practices and those relating to human rights by applying the corporate code of ethics and sharing it with all our clients and suppliers.

During the evaluation of our and our suppliers' due diligence and human rights practices, we identified potential and actual risks within our supply chain:

- Risk of unlawful acts
- Sourcing from conflict-prone areas
- Financing of unlawful acts, conflicts or terrorism
- Corruption or the use of facilitation payments

To respond to eventual risks identified within our supply chain, we use our Risk Management Plan as described in our *RJC manual*. Our risk management plan consists of :

- Immediately suspend or stop purchasing from the suppliers involved. Mitigate where possible.
- Immediately suspend or discontinue purchasing from affected suppliers. Mitigate where possible.
- Continue or temporarily suspend trade with suppliers but implement measurable mitigation actions. Suspend or discontinue if mitigation measures are ineffective.

However, during the evaluation of our and our suppliers' due diligence and human rights practices, we did not identify any risks that resulted in a supplier permanently losing its qualification.

Our partners have always shown themselves to be willing to collaborate in the management of the NC detected and prepared for continuous improvement.

### STRATEGY

Our risk assessment findings are received by Ethics Committee.

To respond to the risks identified within our supply chain, we took the following steps to design and implement a risk management plan with appropriate periodic checks:

To implement our risk management plan we have taken the following risk mitigation steps:

- Identify the risk
- To monitor and track the effectiveness of these risk mitigation measures by appropriate periodic checks

ITALRECYCLING AND INVESTMENT SRL provided the training regarding human rights to our employees via email, public boards and training; this training included information on:

- Standard RJC-COP-2024
- Responsible supply chain
- Human Rights and Working Conditions
- Health, Safety and Environment
- Corporate Policy
- Social and Human Rights
- Commercial, Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy
- Security

We have also provided training regarding our due diligence activities to all of our employees via email, public boards and training; this training included information on our code of practice and anti-corruption code. Once a year, the company organizes a training day for all employees on topics related to all certifications held by Italrecycling & Investment srl.

ITALRECYCLING AND INVESTMENT srl communicate to our stakeholders regarding our due diligence activities and efforts to prevent human rights risks. This communication is in the form of signed commitment. 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.

#### CARRY OUT A THIRD PARTY AUDIT (OPTIONAL INFORMATION)

ITALRECYCLING AND INVESTMENT SRL has joined the RJC in 2022 and has since achieved 3 years certifications.

In support of our continuous improvement journey, our latest third-party RJC audit took place within our organisation against the RJC COP 2024 and RJC COC 2024 on 13-14/02/2023 and a surveillance audit on 06/11/2024.