



MAHAVIR BULLION & REFINERY PRIVATE LIMITED

GSTIN : 27AALCM6691F1Z0 | CIN : U36999MH2018PTC306148

- Grievance, investigation, corrective-action and remediation records, subject to confidentiality.
- Audit, inspection and monitoring records.
- Management review and policy review records.

Records supporting applicable RJC COP requirements shall be retained in accordance with the Company's document-retention controls and applicable law; RJC COP 2024 COP 2.5 requires records to be retained for at least five years unless a longer period is required.

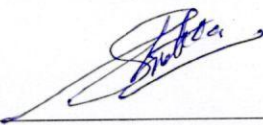
22. Monitoring, Review and Continuous Improvement

- Human-rights risks and the effectiveness of controls shall be monitored periodically.
- Material incidents, grievances, audit findings, supplier concerns and regulatory changes shall be reviewed and used to improve controls.
- This Policy shall be reviewed at least annually.
- Additional review shall be performed following material changes to operations, significant incidents or allegations, major changes in supply chains, legal/regulatory changes, audit findings or other relevant triggers.
- Changes shall be approved through the Company's document-control and governance process.

23. Related Controlled Documents

- Supply Chain Policy
- AML/CFT Policy
- KYC / Due Diligence SOP
- Risk Mitigation Plan
- Non-Discrimination Policy
- POSH Policy
- Whistleblower Policy
- Grievance Redressal Policy
- Health & Safety Risk Assessment Policy
- Staff Safety & Training Policy
- Security Risk Assessment Policy

For Mahavir Bullion & Refinery Private Limited

Prepared By	Reviewed & Approved By
	
Compliance Officer	Director
Shrutika Vishvajeet Deshmukh	Jitendra Panditrao Deshmukh

Mahavir Bullion & Refinery Private Limited | Human Rights Policy | RJC COP 2024



Corporate Office Add.: Office No. 1,
Gr. Floor, S.N.K. Plaza 1, 23/25, Nasta Galli,
3rd Agyary Lane, Mumbai - 400 003.



Reg. Office Add.: W-154-MIDC, TTC
Industrial Area, Thane - Belapur Road, Pawane,
Opp. Krishna Steel, Navi Mumbai - 400 614.



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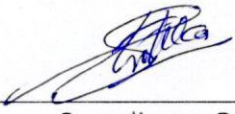
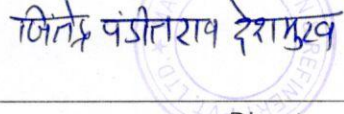
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Changes shall be documented through the Company's document-control process and approved by the Board or other authorised approving body.

23. Related Controlled Documents

- AML/CFT Policy.
- Supply Chain Policy
- KYC / Due Diligence SOP.
- Risk Mitigation Plan.
- Human Rights Policy.
- Grievance Redressal Policy.
- Whistleblower Policy.
- Security Risk Assessment Policy.
- Supplier / Business Partner Code, when approved.
- Product Integrity / Claims & Disclosure Policy, when approved.

For Mahavir Bullion & Refinery Private Limited

Prepared By	Reviewed & Approved By
	
Compliance Officer	Director
Shrutika Vishvajeet Deshmukh	Jitendra Panditrao Deshmukh

Mahavir Bullion & Refinery Private Limited | Anti-Bribery & Anti-Corruption (ABC) Policy | RJC COP 2024

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18. Monitoring, Review and Assurance

- HR / Compliance shall periodically verify that reporting channels are functional and Committee appointments remain valid.
- Required training and awareness shall be monitored.
- Statutory reporting obligations shall be tracked.
- Internal or external audit findings shall be documented and corrective actions tracked to closure.
- The Policy shall be reviewed at least annually and additionally after legal changes, significant incidents, audit findings, organisational changes or material changes in risk.

19. Related Controlled Documents

- Human Rights Policy – RJC COP 2024
- Non-Discrimination Policy and SOP – RJC COP 2024
- Grievance Redressal Policy – RJC COP 2024
- Whistle Blower Policy
- Staff Safety and Training Policy

For Mahavir Bullion & Refinery Private Limited

Prepared By	Reviewed & Approved By
	
Compliance Officer	Director
Shrutika Vishvajeet Deshmukh	Jitendra Panditrao Deshmukh

Mahavir Bullion & Refinery Private Limited | POSH Policy | RJC COP 2024

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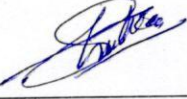


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- Non-Discrimination Policy.
- POSH Policy.
- Health & Safety Risk Assessment Policy.
- Risk Mitigation Plan.

For Mahavir Bullion & Refinery Private Limited

Prepared By	Reviewed & Approved By
	
Compliance Officer	Director
Shrutika Vishvajeet Deshmukh	Jitendra Panditrao Deshmukh

Mahavir Bullion & Refinery Private Limited | Grievance Redressal Policy | RJC COP 2024

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- Conduct internal reviews and support external audits/assessments.
- Evaluate initiatives such as solar/renewable energy, recycling, rainwater harvesting and process-efficiency improvements where feasible.
- Encourage employee suggestions for conservation and pollution prevention.
- Use monitoring, incidents, complaints and audit findings to improve controls.

23. Policy Review and Approval

- This Policy shall be reviewed at least annually.
- Additional review shall occur when operations, processes, equipment or significant resource use changes; environmental incidents occur; applicable laws/consent conditions change; RJC requirements change; audit findings identify gaps; or other material environmental risks arise.
- Changes shall be approved through the Company's document-control and governance process.

24. Related Controlled Documents

- Health & Safety Risk Assessment Policy
- Staff Safety & Training Policy
- Emergency Evacuation Plan
- Risk Mitigation Plan
- Responsible Gold, Silver & PGM Sourcing Policy
- Chemical / Hazardous Substance procedures
- Waste Management / Hazardous Waste procedures

For Mahavir Bullion & Refinery Private Limited

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Retention shall follow applicable law and the Company's controlled-record retention requirements. Any period stated in an individual legal or contractual requirement shall be followed where longer.

19. Policy Violations & Disciplinary Action

Failure to comply with safety requirements may result in corrective action, retraining, removal from safety-critical tasks, suspension or other disciplinary action consistent with company policy, employment terms and applicable law. Serious intentional or reckless violations may be escalated for legal action where appropriate.

20. Policy Review & Continuous Improvement

This Policy shall be reviewed at least annually and additionally following changes in law, significant new risks, incidents, process/equipment changes, RJC updates or internal/external audit findings.

The Company shall use worker feedback, training performance, incidents, near misses, inspections, risk assessments and audit findings to improve the effectiveness of the safety and training programme.

21. Related Controlled Documents

- Health & Safety Risk Assessment Policy – RJC COP 2024
- Emergency Evacuation Plan – RJC COP 2024
- Natural Resources Use & Environmental Management Policy – RJC COP 2024
- Security Risk Assessment & Management Policy – RJC COP 2024
- Grievance Redressal Policy – RJC COP 2024
- Human Rights Policy – RJC COP 2024
- Applicable safety SOPs, JSAs/JHAs, training matrix and emergency procedures

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Mahavir Bullion & Refinery Private Limited | Staff Safety & Training Policy | RJC COP 2024



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21. Policy Review

This Policy shall be reviewed at least annually and additionally following changes in law or RJC requirements, significant cases, audit findings, material process changes, changes to reporting channels or other events that may affect the effectiveness of the mechanism.

22. Related Controlled Documents

- Grievance Redressal Policy – RJC COP 2024
- Anti-Bribery & Anti-Corruption Policy – RJC COP 2024
- Human Rights Policy – RJC COP 2024
- Non-Discrimination Policy & SOP – RJC COP 2024
- POSH Policy – RJC COP 2024
- AML/CFT Policy – RJC COP 2024
- Supply Chain Policy – RJC COP 2024
- Risk Mitigation Plan – RJC COP 2024

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Compliance Officer	Director
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Mahavir Bullion & Refinery Private Limited | Whistleblower & Ethics Reporting Policy | RJC COP 2024

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Mahavir Bullion & Refinery Private Limited | Non-Discrimination Policy & SOP | RJC COP 2024

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