

Sharman D Neill LTD, B & S D LTD – Annual Business Practices Memo

Reporting Period: [2025]

Rationale: This memorandum serves as our annual public communication so that those with a stake in our business can understand our practices this past year and to highlight our compliance with the RJC standards.

1. Management Commitment & Business Profile

Sharman D Neill LTD is a certified member of the Responsible Jewellery Council operating in Belfast.

- **Management Endorsement:** Senior management has reviewed our operating policies this year to ensure they match the expectations of the RJC Code of Practices.
- **Legal & Financial Compliance:** We confirm full compliance with all local laws and permits. No legal fines, penalties, or sanctions were issued to our business during this reporting period. Our annual financial tax filings have been reviewed by our independent accountant.

2. Supply Chain Due Diligence & Human Rights

- **Our Sourcing Policy:** We strictly maintain a responsible supply chain policy that explicitly prohibits any association with conflict, serious human rights abuses, child labour, or forced labour.
- **Supplier Engagement:** We request Know Your Counterparty (KYC) details and business registration data from our significant commercial partners to ensure they are legitimate operators.
- **For Diamonds & Gemstones:** All diamonds purchased and sold during this period were accompanied by the World Diamond Council System of Warranties statement on every commercial invoice.
- **Russia Declaration:** In recognition of the sanctions, we ensure that no diamonds are sourced from Russia.

3. Labour Rights & Workplace Environment

- **Fair Employment:** All members of our workforce have clear, written contracts outlining their hours and fair wages. We strictly operate an equal-opportunity workplace free from any direct or indirect discrimination.

- Workplace Safety & Dignity: Regular health, safety, and fire safety checks are conducted across our facility. We maintain a strict zero-tolerance policy for any form of verbal, physical, or online harassment.

4. Basic Environmental Impact & Carbon Footprint

- Waste Reduction: We actively sort and minimize our office and packaging waste, recycling cardboard and avoiding single-use plastics wherever feasible.

Our Carbon Footprint: As part of our CFree certification, our carbon footprint has been calculated at 79.3 tonnes of CO₂e. The majority of which came from our Scope 3 (indirect) emissions. While the reporting of scope 3 emissions is voluntary for UK companies we endeavour to have a more accurate account of our impact. As such we have purchased GSVERs to offset these emissions. You can read more about our footprint and our plans to mitigate it in our CFree report on the website.

5. Product Integrity

- Truthful Descriptions: We guarantee that all material characteristics—including gold/metal fineness stamps, gemstone identification, and any applicable colour/clarity treatments—are truthfully disclosed to our clients.
- Anti-Mixing Protocols: We continue to ensure our anti-mixing protocols are sufficient to ensure that customers can have confidence in our diamonds.

Public Inquiries

If you have any further interest in our practices this past year, please contact:

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