

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

Reporting Period: [2026]

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 fulfil our reporting requirements under RJC COP Provision 3.1.

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 (If applicable):** All diamonds purchased and sold during this period were accompanied by the World Diamond Council System of Warranties statement on every commercial invoice.
- **Grievances:** Our public contact channel remains open for any stakeholder or worker to raise concerns. We received zero complaints during the past 12 months.

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 accreditation, our carbon footprint has been calculated at 112.73 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 account for our full impact. As such we have purchased 113 tonnes of GSVERs to offset all of our 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 maintain isolated, secure inventory storage and perform routine risk-based testing to guarantee that undisclosed laboratory-grown gemstones are never inadvertently mixed into our natural product parcels.

Public Inquiries

For questions or to request a copy of our underlying policies, please contact:

- Email: Peter@sharman-d-neill.com
- Phone: +44 28 9024 0339
- Postal: SDN, PO Box 2118, Belfast, BT1 9RN.