

External Grievance Procedure

Applicability: Sharman D Neill Ltd and B&S D Ltd

For: External Stakeholders (Suppliers, Customers, Business Partners, Affected Individuals, and Communities)

1. Purpose & Principles

Sharman D Neill Ltd and B&S D Ltd are committed to promoting trust, ethical business practices, and respect for human rights across our supply chains. In compliance with the Responsible Jewellery Council (RJC) Code of Practices (COP 2.6, 6.1e, and 7.1e), this procedure establishes a legitimate, rights-compatible mechanism for external stakeholders to raise concerns, requests for information, or disputes regarding our business practices, human rights impacts, or mineral supply chains free from fears of retaliation.

2. Scope of Grievances

This procedure applies to all external concerns regarding the operations of Sharman D Neill Ltd and B&S D Ltd and their supply chains, including:

- **Human Rights & Labour Abuses:** Torture, forced/compulsory labour, child labour, widespread sexual violence, or gross discrimination.
- **Supply Chain & Sourcing Risks:** Direct/indirect support to non-state armed groups, illegal extortion by public/private security forces, bribery, money laundering, or misrepresentation of mineral origins.
- **Environmental & Community Impacts:** Severe environmental damage, non-payment of local taxes/royalties, or negative impacts on community health and safety.

3. Grievance Submission Channels

Grievances can be submitted free of charge through multiple channels. Upstream actors, communities, or whistleblowers may submit complaints anonymously if preferred.

- Email: Jonathan@sharman-d-neill.com
- Postal Mail / Written Form:

Attn: Compliance Officer, Sharman D Neill Ltd / B&S D Ltd

P O Box 2118, Belfast, BT1 9RN

- Telephone: +44 (0) 28 9028 0339



DIAMOND BY
APPOINTMENT

B & S

B & S D Ltd

PO Box 2118
BELFAST BT1 9RN
NORTHERN IRELAND
TELEPHONE: (028) 9024 0339
E-Mail: jonathan@sharman-d-neill.com

SDN

Sharman D Neill Ltd

PO Box 2118
BELFAST BT1 9RN
NORTHERN IRELAND
TELEPHONE: (028) 9024 0339
E-Mail: jonathan@sharman-d-neill.com

- Face-to-Face / Verbal: Grievances can be raised directly with company representatives during supplier assessments or stakeholder meetings. Local translators or independent facilitators will be provided free of charge if requested to overcome language barriers.

Procedure Upon Receipt of a Complaint

Upon receiving a complaint, we will:

- Obtain a clear and accurate account of the concern raised.
- Explain the steps involved in our grievance-handling process.
- Clarify how the complainant wishes the matter to be addressed or resolved.
- Assess the eligibility and relevance of the complaint and determine the appropriate internal handler.

- If the issue cannot be effectively addressed internally (for example, if we are too far removed from the source of the concern) we may refer the matter to a more appropriate party, such as the relevant supplier or an appropriate industry body.

- Where the matter can be addressed internally, gather additional information as necessary and appropriate.
- Determine any required actions, which may include engaging relevant parties, reviewing evidence, and monitoring ongoing developments.
- Communicate our findings, decisions, or resolutions to the complainant.
- Maintain written records of all complaints received and the internal process followed for a minimum period of five years.