

## Employee Grievance Procedure

SDC Designs LLC, SDC Created, LLC, SHR Jewelry Group, A Link Jewelry Co., LLC, Penny Preville Holding Co., LLC & Super Diamond (noted in this document as **SDC**) has established this employee grievance procedure to hear concerns about Employee & Corporate Human Rights violations, circumstances in its workplace, operations, statements, supply chain procedures or OECD supply chain involving diamonds, colored gemstones and precious metals from conflict-affected and high-risk areas.

Mr. J. Gregory Brannan is responsible for implementing and reviewing this procedure.

Concerns can be raised by interested parties via email or telephone to:

Greg Brannan

Tel: 212-599-4240

Email: HYPERLINK "mailto:jgbrannan@sdcdesigns.com" [jgbrannan@sdcdesigns.com](mailto:jgbrannan@sdcdesigns.com)

On receiving a complaint, we will aim to:

- get an accurate report of the complaint;
- Senior management will review complaint and consult (via web or attorney) how to implement corrective actions;
- explain our complaints procedure;
- find out how the complainant would like it handled;
- decide who is the appropriate person internally to handle the complaint, or help redirect the complaint to another entity, such as the relevant supplier, or a relevant industry body;
- where the issue can be handled internally, seek further information where possible and appropriate;
- identify any actions we should take, or monitor the situation;
- If corrective actions are required, they will be implemented in policies and procedures;
- advise the complainant of any decisions or outcomes; and
- keep records on complaints received, and the internal process followed, for at least five years.

SDC ensures that the person filing this grievance shall do so without fear of blowback, retaliation, dismissal or harassment. The grievance can be filed anonymously by company employees via anonymous email or phone accounts. The grievance filed shall remain confidential.

Grievance procedures shall be reviewed with company employees annually as part of the employee policies annual review.

This grievance procedure has been approved by senior management and is included in the employee handbook, is available online and is posted in the office.

J. Gregory Brannan  
Operations & Chief Compliance Officer

May 22, 2025

SDC Designs, LLC    529 Fifth Avenue    16<sup>th</sup> Floor    New York, NY 10017    +1  
212-599-4240