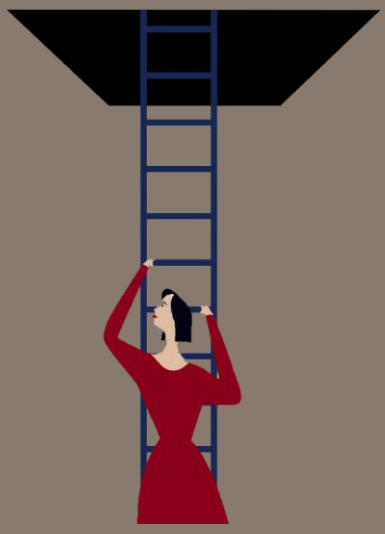
Supplier Code of Conduct



CHRISTIE'S



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CHRISTIE'S



Introduction

Christie's is committed to conducting its business responsibly. We see our suppliers as an extension of our business and we expect the same high standards that we hold ourselves to.

This Supplier Code of Conduct (our "Code") describes the minimum standards of behaviour we expect from our suppliers. It is based on our core values of:

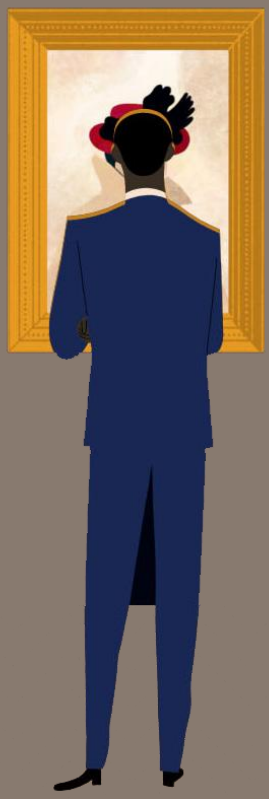
- Integrity
- Excellence
- Innovation
- Responsibility
- Relationships

Scope and Application of Code

This Code applies to providers of goods and services to Christie's, as well as to those providers' employees, directors, agents, consultants, contractors, sub-contractors and representatives.

As such a provider, we expect you to comply with all applicable laws and regulations and with this Code when providing goods or services to us, even if it sets a higher standard than local law or your standard terms and conditions. If you believe that the Code conflicts with local laws then please inform your Christie's contact or Christie's Legal & Risk Department at legalryderst@christies.com.

We may update this Code of Conduct from time to time.



Audit and Non-Compliance with Code

You are required to ensure that your operations, and those of any sub-contractors engaged by you, comply with all applicable laws, regulations, and industry standards or best practices relevant to your business activities. Any non-compliance identified must be effectively remedied without delay and at the supplier's sole cost.

If you discover that you are not compliant with this Code, relevant industry standards and/or applicable law, then you must inform your Christie's contact or Christie's Legal & Risk Department at legalryderst@christies.com without delay.

Christie's reserves the right to audit your compliance with the requirements of this Code. Christie's will provide reasonable written notice ahead of any audit. You must cooperate with us by making available people, information and systems (including those of your sub-contractors) as requested, in a timely manner and at no cost to Christie's. Any non-compliance identified must be effectively remedied without delay and at the supplier's cost. In the event of serious or persistent non-compliance, we reserve the right to automatically terminate our relationship with you with no further notice.

Reporting Non-Compliance or Other Concerns

Christie's also has a Speak Up service which is available to report any wrongdoing in the workplace. This service is run by EthicsPoint, which is an independent organisation, 24/7, 365 days a year, and operates on a confidential basis to report issues such as: fraud, security, health and safety, data breaches, bullying, bribery, corruption, dishonesty, harassment (including sexual harassment), victimisation or any other issue that you feel is unacceptable in the workplace. If you wish to raise a concern confidentially, please visit the Speak Up website at https://secure.ethicspoint.eu/domain/media/en/gui/104866/index.html where you can make a report online. For data breaches specifically, please contact the data protection team at Christie's via email address databreach@christies.com.



1. Fair Working Conditions

Christie's is committed to ensuring that our workplaces and supply chains offer fair working conditions and are free from slavery and human trafficking.

What does this mean for you?

- You must ensure that working conditions, hours, wages and benefits for persons working on our projects, in our workplaces and in our supply chain comply with applicable laws.
- You must fully comply with the provisions of global anti-slavery legislation (including but not limited to the UK Modern Slavery Act 2015 and any other applicable anti-slavery provisions) and have in place robust and adequate internal procedures (including but not limited to appropriate policies, approval processes, training and monitoring) to ensure that human trafficking, child and forced or hidden labour are not taking part in any part of your business or supply chain, and you must disclose to Christie's any reports of the foregoing that are made in respect of your business or supply chains. It is never acceptable for workers to be required to surrender their passports.
- You have a zero tolerance approach to bullying, harassment (including sexual harassment), or unlawful discrimination. You have clear and accessible policies to help prevent unlawful discrimination, bullying and harassment (including sexual harassment) in your organisation.

2. Health, Safety and Environment

Christie's is committed to providing a safe working environment for all employees, suppliers, contractors, visitors and the public.

What does this mean for you?

- Access to Christie's workplaces will only be permitted if it is necessary to enable you to provide services to us.
- When visiting Christie's workplaces your teams must observe all health and safety rules and regulations, Christie's health and safety policies and arrangements as well as Christie's Code of Conduct, Christie's Global Respect and Inclusion Policy and any applicable anti-harassment or prevention of sexual harassment policies, and the instructions of our security team.
- If we require you to do so, you must provide documented risk assessments and safe systems of working in writing in advance of work commencing or as activities progress.
- We reserve the right to refuse access to anyone if we have any outstanding questions or concerns about their compliance with our standards or policies.
- You ensure that your teams are appropriately trained and have the proper equipment to do their jobs.
- Your team members who visit our workplaces must provide formal photo identification when requested. A copy may be taken for our records.
- You must report all health and safety incidents, and any incidents involving the behaviour of your staff (including any complaint relating to sexual harassment), in our workplaces or involving our staff to us without delay. You also will make your staff aware of our Speak Up hotline which they can use to notify us of any concerns.



3. Confidentiality and Data Protection

When Christie's clients entrust us with their confidential information, they expect us to treat it with the greatest of care and utmost confidentiality. Christie's takes this responsibility seriously and is firmly committed to protecting client confidential information and personal data. As part of Christie's commitment, Christie's has put in place policies and processes to ensure that its clients' personal data is processed and secured in accordance with the General Data Protection Regulation ("GDPR") regardless of where they are based as well as any applicable local personal data protection laws.

What does this mean for you?

- You must keep in strict confidence, and store securely, all information of a confidential nature shared with you by Christie's or our clients or suppliers.
- You will not use any confidential information shared with you, directly or indirectly, or inadvertently disclosed by Christie's or discovered by you, by any means whatsoever, for your own purposes and you will, to the extent possible, destroy/delete all information of this kind when we ask you to do so.
- You must have in place robust and adequate internal procedures, training and security measures to ensure your compliance with GDPR and all other applicable data protection laws and regulations when collecting, storing, processing, and transferring Christie's personal data and the personal data of our clients or suppliers.
- You will enter into our confidentiality agreement, which protects proprietary information of Christie's and its clients and suppliers if we ask you to do so.

4. Artificial Intelligence ("AI")

Christie's is committed to ethical, secure and safe use of AI, ensuring that human-centric values are respected, and discrimination and bias avoided.

What does this mean for you?

- If you plan to use AI (including, but not limited: to AI tools, features and systems) when delivering goods or services to Christie's, you must provide us with full details as to how these will be used and obtain our prior written consent. Please note that free-to-use AI are not suitable for use when handling Christie's' data as the terms for such are insufficient in protecting confidential information and/or Christie's data from use for AI training.
- You must comply with all applicable laws, industry standards, guidance and codes of practice in relation to AI, including our AI policies.
- You must ensure that any AI developed or used in the fulfilment of your obligations to Christie's (i) are robust, secure, and safe throughout their life cycle, (ii) respect human rights and human-centric values, including fairness, equality, diversity, privacy, data protection, and avoid unlawful discrimination and bias.
- You must implement responsible AI governance and ethics policies.
- You must ensure transparency in AI usage, maintain explainability and traceability of AI systems, and provide mechanisms for contesting AI-generated decisions.
- You must never use Christie's data for AI training without Christie's prior written consent.
- You must implement appropriate risk management and supervision measures to ensure that third-party providers (if engaged) adhere to Christie's standards.



5. Bribery and Corruption

Christie's is committed to conducting business with integrity, honesty, fairness and transparency. As such we operate a zero-tolerance approach to any acts of bribery and corruption.

What does this mean for you?

- You must have no tolerance for bribery and corruption in your workplace, supply chain or dealings.
- You must be fully aware of, and comply with, the provisions of global and local anti-bribery and anti-corruption legislation (including but not limited to the UK Bribery Act 2010, the US Foreign Corrupt Practices Act, the Hong Kong Prevention of Bribery Ordinance and French Law No. 2016-1691 on Transparency, Fighting Corruption, and Modernising Economic Life (also known as "Sapin II")) and must have in place robust and adequate internal policies, procedures and training to ensure that your teams and contractors also have this awareness.
- You must never request, offer, accept or authorise any bribe or facilitation payment or attempt to improperly influence any person (including members of Christie's staff) through inappropriate gifts, hospitality or other incentives.

6. Protection of Assets, Property and Equipment

Christie's business and reputation depend on us safeguarding our clients' property and our own property and assets. Assets include tangible assets (for example, real estate, equipment, money) and intangible assets (for example, our brand, patents, trademarks, know-how, trade secrets, copyright, data, etc.).

What does this mean for you?

- You respect our clients' property and Christie's property and assets and you do not tolerate theft of property or assets.
- You ensure that your teams comply with our access control procedures and rules. We reserve the right to search all individuals on arrival and when leaving our workplaces.
- You ensure that your teams comply with directions given by the Christie's Security team.
- You must not use Christie's name or marks without our written permission.
- You must at all times maintain appropriate insurance at an appropriate level with a reputable insurance company to cover your obligations to us, your teams and the public. As a minimum this means public liability insurance and employer liability insurance and any other insurances required by applicable law. We may also require you to maintain professional indemnity insurance, property damage insurance, cyber risk insurance and/or product liability insurance, if relevant. You must produce relevant insurance certificates to us evidencing details of the insurance cover and where required, list Christie's as an additional insured. The policies should not be cancelled during the term.



7. Sanctions and the Prevention of Money Laundering, Terrorism Financing, Fraud and Facilitation of Tax Evasion

Christie's is committed to complying with all applicable international sanctions, and all applicable laws relating to anti-money laundering, counter-terrorism financing, the prevention of fraud and the non-facilitation of tax evasion. We do not tolerate the use of our business for illegal activity of any kind and expect our suppliers to take an equally rigorous approach.

What does this mean for you?

- **Sanctions Compliance:** You must be aware of and comply with all international sanctions, including financial sanctions, trade embargoes, and any other relevant import/export restrictions that apply to your business and the goods or services you supply to Christie's.
- **Due Diligence:** You should take reasonable steps to identify and assess external parties you engage with (including beneficial owners of companies). You must ensure they are not listed on any sanctions lists, or suspected of involvement in criminal activity, terrorist financing, or fraud.
- **Anti-Money Laundering and Counter-Terrorism Financing:** You must comply with all applicable laws and regulations related to anti-money laundering (AML), and counter-terrorism financing (CTF), and take all other reasonable steps to ensure that your operations are not used to launder money or finance terrorism.
- **Non-Facilitation of Tax Evasion and Prevention of Fraud:** You must implement robust internal procedures, approval processes, training, and monitoring to ensure your teams do not facilitate tax evasion or engage in fraudulent conduct in connection with the goods or services you supply to Christie's. You should comply with all relevant anti-tax evasion legislation, such as the UK Criminal Finances Act 2017 and all relevant prevention of fraud legislation, such as the Economic Crime and Corporate Transparency Act 2024.

8. Fair Competition

Free competition is important as it encourages efficiency, better prices and innovation in products and services. Christie's is committed to fair competition and does not tolerate any violation of competition or antitrust laws.

What does this mean for you?

- You do not engage with your competitors in activities such as bid rigging, fixing of prices, discounts or other key commercial terms, division of territories markets or customers, limits or controls on production or supply or other types of illegal anti-competitive agreements.
- Where relevant, you do not abuse a dominant position in the market by engaging in practices such as tying, refusal to supply, excessive discriminatory or predatory pricing, or unfair exclusivity restrictions.
- You do not pass information to any of Christie's competitors about our business while you are engaged to provide goods or services, or after our arrangements with you have terminated.



9. Transparency, Responsibility and Personnel

Christie's strives to operate its business with integrity and expects the same of its suppliers.

What does this mean for you?

- You act with honesty and integrity in your dealings with us and when visiting our workplaces.
- You supply honest, accurate and timely invoices. You do not incur expenses without appropriate authorisation.
- You avoid any conflict of interest situations in your business dealings with Christie's and inform us straight away if any actual or perceived conflict arises.
- You shall maintain complete, accurate, and up-to-date records relating to your business dealings with Christie's and your compliance with all applicable laws, regulations, and the requirements of this Code. Such records shall be retained for the period required by law and made available to Christie's upon request. You shall promptly provide Christie's with all information reasonably necessary to support Christie's legal, regulatory, compliance, and reporting obligations. This information must be delivered in a timely manner, in the format and detail agreed between the parties, and at no additional cost to Christie's.
- You are responsible for undertaking proper assessments of the employment status of any individual deployed on Christie's sites in the provision of the relevant services to Christie's on your organisation's behalf. In the UK, you must (i) not engage or deploy any individuals on Christie's sites who fall within off-payroll working rules, commonly referred to as IR35, without informing us in writing in advance and providing us in a timely manner with all necessary information and support to enable us to provide a Status Determination Statement to you to pass down the supply chain as required by law; and (ii) also carry out appropriate due diligence on any intermediaries involved in the supply of individuals deployed on Christie's sites such as umbrella companies.
- You will ensure that all persons deployed to provide services to us on your behalf (e.g. your employees but also any consultants, contractors, sub-contractors and so forth) are legally entitled to work in the relevant territory (for example, you have carried out thorough right to work checks to verify that they have all necessary visas and permits to enable them to work in the relevant jurisdiction) and are suitably qualified, skilled and experienced to perform the tasks assigned to them.



10. Sustainability

Christie's is committed to working towards a more sustainable art industry and strives to build a sustainable art business. We were the first international auction house to set ambitious and important goals and our global sustainability strategy is guided by three key pillars: commit, communicate and collaborate.

What does this mean for you?

- You comply with all applicable environmental laws and regulations.
- You work towards implementing practices to reduce carbon emissions, waste, and water usage.
- You use reasonable efforts to use ethical and sustainable materials and energy sources such as recycling, optimising resource use, and promoting the use of procuring renewable energy sources.
- You are working towards setting, establishing and communicating clear sustainability goals aligned with global standards. Where possible and appropriate, it is considered best practice for such goals to be validated by a recognised external body such as the Science-Based Targets initiative (SBTi).
- You work towards reporting on sustainability metrics and progress towards environmental goals.
- You commit to continuous improvement in sustainability practices.

We _____ confirm our agreement to and acceptance of the requirements set out in this Supplier Code of Conduct.

Signature: _____

Name: _____

Title: _____

Date: _____

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Annex for IT Suppliers

This annex is only applicable if you supply IT goods or services to Christie's.

1. Sustainability

In addition to section 10. Sustainability in the Supplier Code of Conduct, specific requirements apply to certain suppliers based on standards within their industry. Christie's set ambitious and important goals in 2021 (expanded in 2024) to become a more sustainable business, the first major auction house to do so and therefore expects industry standards to be met by its suppliers.

What does this mean for you?

- You continuously monitor and report on sustainability performance, including progress towards emissions reduction and compliance with regional targets, focussing on energy efficient data-centres, minimisation of e-waste and recycling of IT components.
- You maintain transparency in reporting and provide supporting evidence for all sustainability claims and achievements such as certifications for green technology and renewable energy usage in IT operations.



Annex for Shippers

This annex is only applicable if you supply goods or services related to shipping to Christie's.

1. Sustainability

In addition to section 10. Sustainability in the Supplier Code of Conduct, specific requirements apply to certain suppliers based on standards within their industry. Christie's set ambitious and important goals in 2021 (expanded in 2024) to become a more sustainable business, the first major auction house to do so and therefore expects industry standards to be met by its suppliers.

What does this mean for you?

- You will take reasonable steps to provide reporting on carbon emissions per shipment where data is available and systems allow.
- You proactively offer alternatives to air freight journeys (e.g., road or sea), where feasible; and help raise awareness of the relative emissions intensity level of different transport modes (e.g., air freight is often more carbon intensive than sea freight).
- You take reasonable steps to optimise and consolidate routing to improve fuel efficiency, including route optimisation and consolidation where practicable and allowed.
- You maintain or are working towards initiatives to reduce vehicle-related emissions, such transitioning your fleet to hybrid or electric vehicles (including those that use renewable fuels). Where diesel vehicles are used, you aim to meet appropriate emissions standards and implement regular maintenance to support efficient operation.
- You have (or are working towards) a packaging reuse and recycling programme within your operations and with your key packaging contractors.
- Where possible, you seek to use packaging materials with sustainability benefits and recognised credentials.



Annex for Shippers *continued*

2. Standards

We are committed to providing the best service to our clients and ensuring that our clients' property is safely and securely managed and that this is done in full compliance with local and/or international rules and regulations.

What does this mean for you?

- You comply with all applicable laws and regulations and perform all services with the highest level of care, skill and diligence, and in line with best practice in your industry, profession and trade.
- You have all consents, licences and permissions required to perform the services.
- You cooperate with and comply with all reasonable instructions from Christie's in relation to the provision of the services, including if there is physical loss or damage to the property and you notify Christie's of such as soon as possible.
- You ensure that all premises used to store property as part of the services are of a standard expected of a professional logistics company for secure and safe storage.
- You ensure that the services conform with all descriptions and specifications agreed upon.
- You accept responsibility for any property seized, confiscated, removed and/or damaged by any import/export authority due to you or your team's failure to comply with import/export formalities, including failures to properly complete required documentation, permits, declarations and payment of duties, tariffs and other taxes.
- You acknowledge and accept that Christie's does not grant you, and that you have no, legal rights to or over the property (including retaining or selling property) stored as part of the services.
- Christie's may have security interests in property stored with you. For such interests, Christie's directs you to hold such property to the order of Christie's and to deal with it only as directed by Christie's; and you confirm that you will hold such property in your possession to the order of Christie's and deal with it only as directed by Christie's.