

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR 2019

This statement is made by **CHRISTIE'S INTERNATIONAL PLC** on behalf of itself and its wholly owned subsidiary **CHRISTIE MANSON & WOODS LIMITED** (together, "Christie's") pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2019.

Each of the above-mentioned group undertakings have in the 2019 financial year an annual turnover in excess of the threshold of £36 million set by the Modern Slavery Act 2015.

Introduction

Christie's takes the issue of slavery and human trafficking seriously and we understand our responsibility to ensure all risks in our business and supply chains are identified and managed appropriately.

This statement sets out the steps Christie's has taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business, including those of our subsidiary companies.

Christie's Business

Christie's is a world leading art business, offering around 350 auctions annually in over 80 categories, including all areas of fine and decorative arts, jewellery, photographs, collectibles, wine, and more. Christie's also has a long and successful history conducting private sales for its clients in all categories, with emphasis on Post-War & Contemporary, Impressionist & Modern, Old Masters and Jewellery.

Christie's has a global presence in 46 countries, with 10 sale rooms around the world in 2019 including in London, New York, Paris, Geneva, Milan, Amsterdam, Dubai, Zurich, Hong Kong and Shanghai. Further details of our locations of operation can be found on our [website](#).

Christie's additionally operates a number of subsidiary businesses, primarily from New York and London, such as Christie's Education, Christie's International Real Estate and Christie's Fine Art Storage Services.

Christie's Policies on Slavery and Human Trafficking

Christie's is committed to ensuring that our business relationships and supply chains are free from slavery and human trafficking. We have implemented an Anti-Slavery Policy to demonstrate our commitment to this serious issue, which is available on our internal intranet to all staff members.

We have a zero-tolerance approach to slavery and human trafficking and as such, we expect our employees, suppliers and contractors to comply with our values as set out in our Anti-Slavery Policy.

Supply Chain Due Diligence Processes

In order to operate our businesses, we engage external suppliers to provide us with a range of required services. For instance, in the group's primary business of facilitating sales for clients in the global art market, we are supported by a number of both multi-national and locally engaged suppliers providing services to Christie's including, among others, shipping, storage, security, publishing, printing, distribution and IT services.

At Christie's we recognise our role as a customer to play an active role in supplier conduct and have adopted various means to clearly communicate our expectations to suppliers and to guard against the risk of involvement in modern slavery.

In order to do so, we undertake the following practices:

- where possible, we build long standing relationships with local suppliers and contractors and make clear our expectations of business behaviour;
- with regards to either large global supply contracts for the business or contracts involving supply chains determined to present a risk, departments are required to consult and utilise the due diligence and procurement guidelines when selecting a supplier;
- our procurement and due diligence guidelines include a requirement to ask suppliers to confirm, by signing up to our supplier code of conduct, that they have appropriate measures in place to address anti-slavery and human trafficking;
- our Anti-Slavery Policy encourages employees to report any concerns under Christie's Whistleblowing Policy;
- our third-party procurement consultants are aware of our policy and the need for suppliers that they may be involved in procuring services from on our behalf to comply with our policy, procedures and due diligence; and

- as part of our risk reporting framework, identify and manage key risks which will include due consideration of any supply chains that may be at risk on a regular basis.

Mindful of the need to ensure that Christie's continues to maintain the best possible standards, we keep under review our practices and procedures in selecting and onboarding our suppliers and work to address any areas of risk or concern that arise.

What we have done

During 2019, in conjunction with the relevant business teams, Christie's Legal and Risk teams conducted an annual review and continued to monitor categories of services and departments within the business that were identified as potentially being at risk of exposure to modern slavery and human trafficking. As in previous years, this involved taking into account the types of work undertaken and the potential complexity of supply chains. They concluded none are at high risk, but that Operations must remain diligent and alert as they are the supply chains most likely to be at risk, though we note it is a low risk likelihood.

As part of our ongoing review to adhere to best practice in selecting and onboarding our suppliers, Christie's implemented updated diligence and onboarding processes with our suppliers via a Supplier Code of Conduct to formalise the minimum expected behaviours of our suppliers. The new Code, required to be signed by all new suppliers and in the process of being rolled out to all existing suppliers, requires suppliers to confirm their adherence to fair working practices, including compliance with the Modern Slavery Act and commitment to ensuring that their supply chains are free from human trafficking, child and forced labour.

More recently, from the emergence of the COVID-19 virus outbreak and on a continuing basis, Christie's has monitored all global developments related to the outbreak, including adherence to the recommendations from the World Health Organisation (WHO) and local government guidelines in each of its locations. Christie's undertook a review of its global auction calendar in light of precautionary closures and travel restrictions, and took steps to reduce non-essential business activities. Our teams have worked closely with our suppliers to ensure that the continuing operations are in compliance with applicable guidelines and regulation. The health and well-being of our employees, our clients and our suppliers has throughout remained our highest priority. These changes to our ways of working has resulted in some disruption to usual operations, as our teams had to focus on swiftly implementing changes to address the outbreak's impact upon our business

in priority to other matters. This has unfortunately resulted in the late completion this year of our Modern Slavery risk assessment and annual statement publication.

Monitoring Compliance

We ensure that any (i) large global contracts; or (ii) contracts for departments that are identified as being at risk, are assessed using our updated due diligence and procurement guidance. This requires, amongst other matters, that departments ask suppliers to confirm that they engage in ethical business practices, that they are compliant with the Modern Slavery Act, and to give proper consideration to any exposure as part of the risk reporting framework.

Where any issues are identified during the due diligence and procurement process, for example if a supplier is unable to confirm its compliance with the Modern Slavery Act or is deemed to have inadequate policies or measures in place, or if the supplier is unwilling or unable to sign up to our supplier code of conduct, an escalation procedure has been established that will require sign off or approval from a senior manager and notification to a senior committee if the Legal team have concerns about a Supplier's compliance.

As is our established practice, we continue to work with existing suppliers as part of any contract reviews, renewals or tenders to investigate and make any necessary changes where possible and appropriate, where those contracts are deemed at risk.

We have not to date found any evidence of practices that violate our values relating to those contained within our Anti-Slavery Policy. However, we have internal measures in place that would enable us to deal with a breach of our values that relate to slavery and human trafficking appropriately (e.g. whistleblowing mechanism) and we periodically reassess whether these principles need to be refined or further developed to deal with any non-compliance that may arise.

Staff Training

Christie's provides key members of staff identified as managing supply chains within Christie's business areas that may be at risk with relevant training, and on an annual basis assesses the need for further roll out or refresher training.

This statement has been approved by a resolution of the Board of Directors dated 28th July 2020.

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Signed for and on behalf of

Christie's International plc

By its director, Guillaume Cerutti

Date of Signature: 09 August 2020 | 03:52 PDT