

## **CHRISTIE'S MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2022**

This statement is made by **CHRISTIE'S INTERNATIONAL PLC**, as the holding company of the Christie's Group of Companies (the "**Group**"), on behalf of itself and its wholly owned subsidiary **CHRISTIE MANSON & WOODS LIMITED**, as the main operating, employment and treasury company of the Group in England & Wales, (together, "**Christie's**") pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 (the "**Act**") in respect of the financial year ended 31 December 2022 (the "**Financial Year 2022**").

Christie's can be defined as a body corporate operating in the United Kingdom, providing goods and services and has achieved an annual turnover in excess of £36 million during the Financial Year 2022. Therefore, the business meets the reporting requirement threshold as set by the Act to produce and publish a Modern Slavery Statement for the Financial Year 2022.

### **Introduction**

Modern slavery remains a significant and growing global issue which we recognise as a crime and a violation of fundamental human rights that takes many forms, all of which involve deprivation of personal liberty and exploitation for personal or commercial gain. As a global business, Christie's has a zero-tolerance approach to all forms of slavery and human trafficking and remains committed to playing our part with the eradication of modern slavery which includes our responsibility to ensure that modern slavery risks in our business and supply chains are identified and managed appropriately. In line with the Act, we have set out in this document the steps that Christie's is taking to identify and minimise modern slavery risks. No evidence of modern slavery or forced labour was found in our operations or supply chain during 2022.

### **1. Business Structure**

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

Christie's has a global presence throughout the Americas, Europe, Middle East, and Asia Pacific, with flagship international sales hubs in New York, London, Hong Kong, Paris and Geneva. Christie's operates its auctions out of 10 salesrooms around the world in London, New York, Paris, Geneva, Milan, Amsterdam, Dubai, Zurich, Hong Kong and Shanghai, as well as on our advanced online bidding platform.

Further details on our locations of operation can be found on our [website](#).

Additionally, Christie's provides a number of services across the Group that are ancillary to its primary auction and sale activities, such as our fine art and wine storage services, and our continuing education business.

## 2. Policies on Slavery and Human Trafficking and approach to Fair Working Conditions

Christie's is committed to ensuring that our business, relationships and supply chains are free from slavery and human trafficking across our global regions. We have implemented an Anti-Slavery and Trafficking Policy (the "**Anti-Slavery Policy**") to demonstrate our zero-tolerance approach to slavery and human trafficking and commitment to this serious issue. The Anti-Slavery Policy is available on our internal intranet to all staff members and we expect full compliance by our employees and suppliers with our company values and our process for escalating human rights concerns as set out in this Policy.

We emphasise the necessity for adherence to our Anti-Slavery Policy in our Employee Code of Conduct (the "**Employee Code**"), which reiterates Christie's' commitment to ensuring fair working conditions and freedom from slavery and human trafficking in our workplaces and supply chains. At Christie's, we recognise that our employees are a key component of our success and through our policies we set out clear parameters for employee behaviour including the expectation for all employees to apply a zero-tolerance approach to slavery and human trafficking, regardless of their role. In addition, the Employee Code draws the attention of employees responsible for procuring services to the Supplier Selection and Management Process that they must follow, which encompasses the due diligence processes set out below in section 3.

Our Supplier Code of Conduct (the "**Supplier Code**") sets out Christie's' values, including Integrity and Respect, which we endeavour to embody in how we operate our business and how we interact with others. We expect the same standards of behaviour from our suppliers in how they conduct their business whilst working on behalf of Christie's. We state that Christie's reserves the right to audit suppliers in compliance with our Supplier Code and to terminate our relationship with suppliers in the event of non-compliance with the Code, and non-compliance of the relevant laws referred to including the UK's modern slavery and fair working practice legislation.

In 2022, the Supplier Due Diligence Questionnaire and Procurement Policy were reviewed to better manage any risk of modern slavery posed by potential suppliers and to ensure all successful suppliers' compliance with the Supplier Code. The Supplier Code is available in English, French and Chinese (being the languages identified as most widely spoken amongst our global suppliers) to ensure accessibility and complete comprehension of the Supplier Code by our suppliers in order to enhance compliance across our global regions, and we will continue to monitor where our key supplier relationships are geographically and prepare further translations as we think is appropriate and proportionate.

In addition, to support fair and safe working conditions of our employees, contractors, suppliers and our clients, we have an established Global Health, Safety and Security Policy which was reviewed and updated in June 2022 and sets out our reporting and escalation process of health, safety and security risks within the business. Furthermore, anyone who is employed by Christie's on a permanent or fixed term basis, on secondment, and/or on a temporary contract such as agency workers or an independent consultant to Christie's, is able to raise any concerns that they have about any wrongdoing or malpractice by following the process set out in our Whistleblowing Policy, without fear of discrimination, retaliation or harassment.

### 3. Supply Chain Due Diligence Process

In order to operate our business, Christie's engage multi-national and local external suppliers to provide us with a range of required services including, among others, shipping, storage, security, publishing, printing, distribution and IT services, as well as catering, cleaning, and hospitality services (our "**Third Party Services**").

We acknowledge that we do not have complete oversight over the operations and working practices of the providers of our Third Party Services as Christie's relies on the expertise of third parties to support various services that we provide to our client base. As a result, we regard our supply chain relationships as a potential exposure to modern slavery risks in our business and we recognise that Christie's has a responsibility to seek reassurance that our contractors are compliant with the Act and operate fair working practices, and take steps to manage this exposure. At Christie's we recognise our role as a customer to play an active part in supplier conduct and we 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 minimise our risks as a business, we undertake the following Supply Chain Due Diligence Process steps and practices:

- our new suppliers are evaluated through our Supplier Selection and Procurement Management Process, which includes the completion of our Vendor Due Diligence Questionnaire;
- our Supplier Selection and Procurement Management Process includes a requirement to ask suppliers to confirm, by signing up to our Supplier Code, their adherence to fair working and ethical business practices, including compliance with the Act and commitment to ensuring that their supply chains are free from human trafficking, child and forced labour;
- on an exceptional basis, if our Supplier Code is not accepted by a potential new supplier, and instead the other party requires Christie's to agree and adhere to their own Code of Conduct, the Legal team will accept this on the basis that the supplier's own Code covers the same topics as our own, such as anti-bribery and modern slavery;
- our Legal team ensure that contracts that we enter into with our suppliers reflect key standards around ethical behaviour, and that our contracts with third parties include clauses on modern slavery and anti-bribery, and wherever possible request that the contract adheres to the laws and regulations of England & Wales;
- where possible, we build long standing relationships with local suppliers and contractors and make our expectations clear on what we regard to be ethical and good business behaviour;
- our Anti-Slavery Policy and Employee Code encourages employees to report any concerns under our Whistleblowing Policy and/or by using the "Speak Up" tool (see further below); and to ensure that contractor and supplier health and safety risk assessment processes are in place.

Christie's are mindful of the need to ensure that our business continues to maintain the best possible standards and as such, our practices and procedures in selecting and onboarding our suppliers are under continual review.

#### **4. Our Annual Risk Assessment**

During 2022, in conjunction with the relevant business teams, the Christie's Legal team conducted an annual review and continued to monitor categories of services and departments within the business that have been identified as potentially being at risk of exposure to modern slavery and human trafficking (the “**Annual Risk Assessment**”). These higher risk categories include areas where we outsource services, such as Our Third Party Services, and our internal practices around recruitment of staff and our handling of precious stones in the Jewellery department.

##### **A) Our Third Party Services**

As in previous years, the Annual Risk Assessment involved taking into account the types of work undertaken on behalf of Christie's by our Third Party Services providers such as shipping, art transport, facilities, storage, security, publishing, printing, distribution and IT services, as well as catering, cleaning, and hospitality services and the potential complexity of supply chains. Employees of the business who interact with our suppliers and have responsibility for supplier relationships have collaborated with the Legal team to provide their annual confirmation that they have undertaken the Supply Chain Due Diligence Process steps as set out in section 3 above.

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 Act, 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, an escalation procedure has been established that requires sign off or approval from the General Counsel and notification to our Executive Committees if the Legal team has concerns about a Supplier's compliance (our “**Risk Reporting Framework**”). As part of any contract reviews, renewals or tenders, we make an assessment on whether to continue to work with existing suppliers and whether to make any necessary changes where possible and appropriate, particularly where those contracts are deemed at risk.

During the year, we have identified the Third Party Services of IT, Facilities, Security and Shipping as the areas of our supply chain which hold the greatest exposure to modern slavery risks. We have made this assessment on the basis that these services typically use temporary workers, often in lower paid professions, potentially whom have come from abroad on temporary work visas, and may be more vulnerable to unfair working practices such as long work hours without breaks and being paid under the local minimum wage. While we take a holistic approach to engaging with suppliers in all areas across our business, we remain particularly focused on the compliance of the suppliers of these Third Party Services with our Supplier Code.

##### **B) Jewellery**

We acknowledge that handling and being custodians of luxury products, such as jewellery, comes with the responsibility to rigorously check the provenance of such precious jewels to ensure their journey prior to being received by Christie's does not have any links to modern slavery, child labour or unfair working practices.

Our Jewellery Specialists across Christie's global regions undertake several checks to eliminate this risk and practices are embedded in the way we handle precious jewels on behalf of our clients including, but not limited to, requesting provenance documentation and Know Your Client information from our clients,

maintaining strong and transparent relationships with those within the precious stones and jewellery trade to attest the provenance of jewellery, and keeping an updated list of stolen jewels. In addition, Christie's have a strict approach to only dealing with cut and polished diamonds, and not dealing with 'rough' diamonds in any circumstances.

### **C) Recruitment of Staff and Temporary Workers**

Christie's offer market-relevant pay and reward, have a globally consistent approach to reviewing pay regularly, and understand our pay and benefits obligations in each jurisdiction in which we employ staff or engage people through third parties. Additionally, we implement controls to ensure that any legal obligations in respect of pay are complied with and our Human Resources ("HR") department uses market data to set salaries at competitive levels with a view to attract and retain talent and to ensure fair treatment for all our staff.

Our HR team confirmed as part of the Annual Risk Assessment that certain processes are followed to ensure that fair working practices are in place. These processes include ensuring that the rate of pay is discussed and agreed in advance when Christie's engages with temporary work agencies to ensure minimum wage is received. This is reviewed across all temporary roles when the minimum wage is adjusted by the government and then communicated back to the agency. Christie's continues to cultivate long-standing business relationships and therefore has the preference of using agencies that we have worked with in the past. In the case that it is necessary to use new agencies, we pay great attention to this appointment. Our agencies hold the responsibility for ensuring all temporary workers have the relevant right to work.

Professional HR teams are in place in all key jurisdictions with dedicated personnel responsible for compensation alongside the compensation team situated in London which exercises global remit and responsibility. The HR team in London ensures it is up to date with relevant local legislation including changes to minimum wage, and engages with local experts when required in particular jurisdictions. In respect of calculating wages of our workers, market data is used to determine salary bandings that is targeted to be in the median to upper quartile. Reviews on the London 'living wage' and the global statutory minimum wage are performed on an annual basis.

In addition, Christie's have internal measures in place that would enable us to be informed of and deal with a breach of our values that relates to slavery and human trafficking appropriately through the "Speak Up" tool. Speak Up is a whistleblowing and grievance reporting tool available for all employees and is easily accessible via the Christie's Intranet. This is a confidential third party provided mechanism through which employees can make known any concerns in the event that a colleague, client, supplier or any other person is acting inappropriately.

### **D) Findings**

Through the completion of our Annual Risk Assessment we have not to date found any evidence of practices of our existing suppliers that violate our values relating to those contained within our Anti-Slavery Policy internally and no issues relating to Modern Slavery which have been reported externally in relation to suppliers of our Third Party Services. Additionally, no issues were raised internally through the Speak Up tool either. The Assessment concluded none of the areas of Christie's business are at high risk of exposure to modern

slavery, however, it is reiterated that IT, Facilities, Shipping and Operations and other departments (including Jewellery and HR) must remain diligent and alert to the potential risks in these areas, and wherever necessary to take action to raise any concerns regarding our supply chains, and our internal recruitment practices and handling of jewellery.

## 5. Effectiveness – Key Performance Indicators

In the financial year which ended 31 December 2021, we identified and formulated performance indicators against which we now measure our effectiveness in ensuring that slavery and human trafficking is not taking place within our business or supply chain. The following sets out our performance against these indicators for the Financial Year 2022:

- (i) **Targeting zero Modern Slavery issues to be flagged through the Speak Up reporting tool, and for any reported allegations in this area to be followed up using the escalation procedure:** In 2022 no Modern Slavery issues were flagged through the Speak Up reporting tool.
- (ii) **Targeting 100% sign up to our Supplier Code of Conduct by our new suppliers and existing suppliers on renewal of contracts across the globe:** We have imbedded our Procurement and Onboarding process for all new suppliers and in 2022 all new suppliers engaged through our procurement function signed up to our Supplier Code of Conduct and/or are bound by their own supplier code of conduct which Christie's legal team review to ensure it aligns with our Supplier Code of Conduct. We continue to work with our existing supplier base to encourage adherence to our Supplier Code of Conduct when contracts are up for renewal and ensure that appropriate business teams who may conduct smaller engagements outside of the formal procurement function are aware of and compliant with the due diligence processes (including Code of Conduct compliance). Furthermore, we have recently implemented a contract management system which (as data is incorporated onto this system) will enable us to track this data across our suppliers.
- (iii) **Targeting 90% sign up to our Supplier Code of Conduct by suppliers in relation to legacy contracts in respect of Facilities, Security and IT, which we have identified as the high risk areas of our supply chain:** Following review, our gathered data suggests that as at the date of preparation of this statement, in excess of 90% of suppliers in the IT space have signed up to our Supplier Code of Conduct (or have provided their own, that our legal team have reviewed for alignment with Christie's), in excess of 90% of our shipping suppliers, in excess of 80% of key global and regional facilities' suppliers, and in excess of 90% of our key security within EMEA and Americas have signed up. As flagged above, it is expected that the supplier management database when fully implemented will enable us to establish and track this data more accurately.
- (iv) **All staff to be provided with access to training on Modern Slavery in accordance with the implementation of the 2022 Training Plan:** We provided specialised training for

Christie's employees with responsibilities for managing our contractor and supply chain relationships, including Procurement, Operations, Security, Facilities, Human Resources and IT departments and teams, in September 2022 (see below) , and all materials have been filed for review for future training requirements.

We will continue to investigate further steps that we can take by reviewing best practice and benchmark Christie's against our peers in our industry, the appropriateness for our KPIs in the event that our risk assessments indicate changing key risks, and review and update our KPIs informed by what we learn.

## 6. Staff Training

Christie's assesses the need for training across the business on an annual basis and provides key members of staff identified as managing supply chains with relevant training on modern slavery risks. In September 2022, we provided training to employees with responsibilities for managing our contractor and supply chain relationships, including Procurement, Operations, Security, Facilities, Human Resources and IT departments, to explain and emphasise the importance of taking steps to mitigate modern slavery in our supply chains and the responsibility that employees have in following our Vendor Due Diligence process. Information was provided on what they should look out for in terms of identifying potential flags of modern slavery for within the supply chain relationships that they are responsible for.

Christie's recognise the necessity for staff to have access to training on modern slavery risks and the steps that they can take in their particular roles to identify and assess risks in this area. We continue to look for opportunities to raise awareness of the relevant issues with business teams and the wider cohort of staff.

This statement has been approved by a resolution of the Directors of the following Boards:

<p><b>Christie's International plc on 19<sup>th</sup> June 2023</b></p> <p>DocuSigned by:    C526F88261534C7...</p> <hr/> <p>Signed for and on behalf of Christie's International plc by its director and Chairman, <b>Guillaume Cerruti</b></p> <p>Date of Signature: 20 June 2023   04:31 PDT</p>	<p><b>Christie Manson &amp; Woods Limited on 20<sup>th</sup> June 2023</b></p> <p>DocuSigned by:    9EB199FC968C411...</p> <hr/> <p>Signed for and on behalf of Christie Manson &amp; Woods Limited by its director, <b>Sophie Carter</b></p> <p>Date of Signature: 20 June 2023   05:53 PDT</p>
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