

CHRISTIE'S

CHRISTIE'S INTERNATIONAL PLC ("Christie's") – Slavery and Human Trafficking Statement for the Financial Year 2016

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act 2015 and 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.

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.

Christie's business

Christie's is a global auction business, offering around 300 auctions annually in over 80 categories, including all areas of fine and decorative arts, jewellery, photographs, collectibles, wine, and more. Christie's has a global presence in 46 countries, with sale rooms in Amsterdam, Dubai, Geneva, Hong Kong, London, Milan, New York, Paris, Shanghai and Zurich. Christie's also operates a number of subsidiary businesses, such as Christie's Education, Christie's International Real Estate, Christie's Fine Art Storage Services and Collectrium.

Christie's business has an annual turnover in excess of the threshold of £36 million set by the Modern Slavery Act 2015.

Supply Chain Overview

In order to operate our businesses, we engage external suppliers to provide us with a range of required 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 and Anti-Slavery Policy.

Due Diligence Processes

Respecting human rights and environmental issues in the supply chain is ultimately our suppliers' responsibility. As customers however, we play an active role in supplier conduct and have adopted various means to clearly communicate our expectations to suppliers.

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;

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- we have added a new stage in the due diligence and procurement guidelines so departments are now required to ask such suppliers to confirm that they have appropriate measures in place to address anti-slavery and human trafficking;
- our new Anti-Slavery Policy encourages employees and contractors to report any concerns under Christie's Whistleblowing Policy;
- we have engaged with our third party procurement consultants and ensured they are aware of our new 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.

Key Risks

What we have done during the financial year

Christie's Risk team have reviewed and identified categories of services and departments within the business that may be at risk of exposure to modern slavery and human trafficking. 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.

In order to minimise the risk of modern slavery and human trafficking in our supply chains, where we have engaged with new suppliers on suppliers' terms, we have required the inclusion of provisions confirming (i) their compliance with the Modern Slavery Act and (ii) that they have adequate and appropriate measures in place. Further, we have updated our supplier terms and conditions to require compliance with the Modern Slavery Act. In each case, failure to comply provides us with a right to terminate the contractual relationship with immediate effect.

What we discovered

We have not found any evidence of practices that violate our values relating to those contained within our Anti-Slavery Policy.

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 will periodically reassess whether these principles need to be refined or further developed to deal with any non-compliance that may arise.

Monitoring Compliance

We will ensure that any (i) large global contracts; or (ii) contracts for departments that are identified as being at higher risk, are assessed using the due diligence and procurement guidance. This requires, amongst other things, 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, we will develop an escalation procedure that will require sign

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off or approval from a senior manager in order to proceed. This escalation procedure will include the required steps in the event of a breach of a supplier's obligations to comply with the Modern Slavery Act and such breach will be notified at a senior committee meeting.

We will also work with existing suppliers as part of any contract reviews to investigate and make any necessary changes where possible and appropriate, where those contracts are deemed to be at risk.

Staff Training

Christie's requires each of its members of staff identified as managing the supply chains within Christie's business areas that may be at risk to have relevant training.



For and on behalf of Christie's International plc

Date: 19/6/2017