

MODERN SLAVERY STATEMENT FOR AUCTION TECHNOLOGY GROUP PLC

FINANCIAL YEAR ENDING 30 SEPTEMBER 2020

INTRODUCTION

We are committed to improving our practices to ensure slavery and human trafficking are not taking place in any part of our business or our supply chain, and this statement sets out the steps we have taken during the financial year.

We expect the same commitment from our suppliers, contractors and business partners.

ORGANISATIONAL STRUCTURE

We are a public limited company headquartered in London with approximately 250 employees and offices in three separate jurisdictions (the UK, the USA and Germany). We operate online marketplaces on which auctioneers list their auctions and take on-line bids. The items auctioned include:

- art, antiques and collectables;
- industrial machinery, construction and farm equipment; and
- consumer surplus and retail returns.

We also provide software as a service to auctioneers (for example, white label live bidding for their own websites and back office systems).

This statement applies to each company within our corporate group, including our trading companies:

- Metropress Limited - trading as Auction Technology Group
- Auction Technology Group Germany GmbH
- Proxibid Inc
- Bidspotter Inc
- Auction Mobility LLC

OUR SUPPLY CHAINS

Our key supply chains comprise:

- technology service providers – including outsourced software development, managed hosting services, cloud solutions, software licenses and hardware supply;

- people services - including recruitment agencies, professional service advisors and benefits providers; and
- facilities management – including building maintenance, refreshment providers and office consumable suppliers, transport and logistics.

Although we mainly operate in the UK and USA, we appreciate that some of our suppliers operate in jurisdictions where there is potentially a greater risk from slavery and/or human trafficking issues (including Southern and South East Asia). However, our suppliers in these potentially higher-risk jurisdictions are generally highly-skilled technical specialists, so the actual risk associated with engaging them is low. Nevertheless, the level of management control required for these sources is regularly monitored.

OUR SLAVERY AND HUMAN TRAFFICKING POLICY

Given the sector that we operate in and the nature of our supply chain, we have assessed the risk to our business and supply chains from slavery and human trafficking as being low.

Nevertheless, we are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We act ethically and with integrity in all our business relationships, and this statement reflects our commitment to implementing and enforcing proportionate and effective systems to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We engage in business partnerships with established and reputable business partners/clients, with whom we aim to build long-term partnerships.

As part of our initiative to identify and mitigate risk, we have systems in place to:

- identify and assess potential risk areas in our supply chain;
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chain; and
- protect whistle-blowers.

THIRD PARTY ADHERENCE TO COMPANY VALUES

We have a zero-tolerance approach to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values, we have in place a supply chain compliance programme. This consists of carrying out the due diligence referred to above as to the potential level of risk of slavery and human trafficking for any new suppliers or business partners/clients. Should we discover that any of our suppliers or business partners/clients tolerate or turn a blind eye to modern slavery, we would take steps to terminate our business relationships with them at the earliest practical opportunity.

Our Human Resources department is responsible for monitoring and reviewing compliance with the law and periodically reporting to the board on this area.

TRAINING AND COMMUNICATION

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have published this statement on our website and we will:

- introduce staff training; and
- promote internal and external communication of this issue.

Our standard terms and conditions require those parties that we contract with to comply with all applicable laws.

KEY PERFORMANCE INDICATORS

We have measured our performance by the number of incidences of slavery or human trafficking in our supply chain of which we are aware (i.e. zero). Going forward, we will use the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- **Vetting procedures.** The number or percentage of existing and prospective suppliers and business partners/clients that have been vetted for ethical labour practices.
- **Due diligence.** The number and type of issues identified in due diligence of suppliers and sub-contractors.
- **Whistleblowing.** The number of reported breaches in the past year.
- **Training.** The number or percentage of staff trained.
- **Remedial action.** The instances of remedial action being needed.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 30 September 2020. It was approved by our board on 21 April 2021.



John-Paul Savant (Chief Executive Officer)

Date: 21 April 2021