

Modern Slavery and Human Trafficking Statement

Introduction

This statement is made by The Halcyon Gallery Limited.

The Modern Slavery Act 2015 requires larger commercial organisation operating in the UK to produce and publish an annual slavery and human trafficking statement.

This statement sets out our commitment to combating slavery and human trafficking in all aspects of our business. We recognise that forced labour, slavery and human trafficking are global problems affecting every industry and every sector. We have a zero tolerance approach to these issues, and work to ensure that they have no presence in any of our supply chains, or indeed any part of our business.

Our business

We are a private art gallery specialising in modern and contemporary art work. We work with artists from around the world, including in the UK, America, Colombia, Spain and Italy.

We have three galleries in Central London and a storage facility in North London. We employ 90 people across our four sites. We have an annual turnover of c. £100,000,000.

Our supply chains

Most of our works of art are purchased from the UK and America. All purchases are subject to a thorough provenance search to establish their authenticity and current owners.

We also work closely with contemporary artists and their own teams.

Finally, we also work with other suppliers and our supply chains include transport companies, framers etc.

We will ensure all incumbent and potential suppliers are treated fairly and professionally and that the principles of ethical and sustainable procurement are upheld at all times when identifying and selecting suppliers.

Our policies

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

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Our internal policies and employment procedures are reviewed regularly to ensure compliance with the legislation. Particular policies relevant to the combating of modern slavery and human trafficking include our suppliers relationships.

Our Due Diligence

In terms of recruitment, our processes are transparent and reviewed regularly. We communicate directly with UK established agents and candidates to discuss job opportunities and to confirm the

details of any offer made and work only with reputable recruitment businesses. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account.

We work closely with individual artists and their teams across the world but we have limited outsourcing and other supplier relationships. However when we do outsource work, or utilise any suppliers within our Galleries or warehouse, whether for installations, transport or otherwise we carefully consider these prior to engagement. We ensure that all on-site contractors, who provide staff to work at our Galleries or storage facilities, are highly reputable.

We will not work with any artist or supplier organisation that has been found to have been knowingly involved in either human trafficking or modern slavery.

Our commitment to constantly improve

Our Board of Directors take responsibility for implementing this policy statement and its objectives and provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation or within its supply chains.

We will continue to monitor and review our policies relating to slavery and human trafficking. If we become aware of any breaches, we will investigate and take such steps as are necessary to ensure that the risk of further breaches occurring is minimised.

This statement is made pursuant to section 54 of the Act and constitutes our slavery and human trafficking statement for the financial year ending 2020. It was approved by the Board of directors in March 2026.

Eran Akerman

C.E.O

Halcyon Gallery Limited

Date: 31/3/2026