

Opera Gallery Group Limited (“OGGL”) Modern Slavery Act Statement

Modern Slavery Act 2015

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

OGGL is committed to improving its practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes OGGL's slavery and human trafficking statement the operations based in the United Kingdom.

Organisational structure

OGGL was founded on 20 April 2001 and is a private limited company. Through its subsidiaries, it operates a network of art galleries specializing in modern and contemporary art and located in the USA, Europe, Asia, and Dubai.

In the financial year 2023 the group employed 91 staff with a global annual revenue of €147.5mil.

Supply chain

OGGL is committed to ensuring modern slavery does not exist in its organisation or supply chains. We constantly strive to develop policy and procedures to manage the way we obtain our goods and services to keep our supply chains robust.

OGGL continues to assess the modern slavery standards of its key suppliers having implemented a more formal, automated, risk-based supplier due diligence process.

We are diligent on assessing on whether we have any high risk spend areas and on raising awareness across all staff, from the Executive team through to everyone at our places of work to ensure all products and services are sourced and supplied responsibly and ethically.

Procedures

OGGL has a clear framework of rules and behaviours and encourages the reporting of any concerns or breaches so that they can be dealt with appropriately in accordance with its policies and procedures.

We have reviewed and revised our safeguarding instruction, procedures and framework to ensure we recognise, report and respond to all concerns or incidents of safeguarding. We are committed to keeping all our people safe from harm and abuse; this includes children, adults at risk and anyone who comes into contact with OGGL.

OGGL encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the group. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking.

We offer an independent and confidential whistleblowing hotline where staff and volunteers can raise concerns confidentially and anonymously if they wish. We also provide staff with a

secure way of seeking advice about any modern slavery or human trafficking issues personally affecting them or their families.

OGGL makes clear to employees the actions and behaviour expected of them when representing OGGL. It strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing the group's supply chain.

OGGL checks that staff can demonstrate their eligibility to work in the UK and requires all contractors and agency staff to undergo an eligibility check before commencing work with OGGL.

This statement has been approved by OGGL's board of directors, who will review and update it annually.

Date: 10 September 2024