

MODERN SLAVERY STATEMENT FOR AUCTION TECHNOLOGY GROUP PLC

FINANCIAL YEAR ENDING 30 SEPTEMBER 2025

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 475 employees and offices in four separate jurisdictions (the UK, the USA, Mexico and Germany). We operate online marketplaces on which auctioneers list their auctions and take on-line bids, as well as traditional online marketplaces that connect sellers with buyers. 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
- Auction Mobility LLC
- Live Auctioneers LLC
- Vintage Software, LLC – trading as estatesales.net
- Chairish, Inc.
- Pamono GmbH

- Pamono Ltd
- Pamono, Inc.
- Auction Technology Group Mexico, S.A. DE C.V.

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;
- professional and 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 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:

- 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, human trafficking, and child or forced labour.

As an online marketplace and technology business, our supply chain primarily comprises large technology providers, professional services firms and other corporate service providers. We do not operate manufacturing facilities and we have a relatively limited exposure to high-risk physical supply chains.

We expect our suppliers and business partners to operate in accordance with applicable laws, including the UK Modern Slavery Act 2015 and equivalent legislation in the jurisdictions in which they operate. Our standard contractual terms require suppliers to comply with all applicable laws, and we may conduct proportionate due diligence where appropriate based on risk.

Where concerns are identified, we will investigate and, where necessary, take appropriate action, which may include requiring remediation or terminating the relationship.

Responsibility for overseeing compliance with this policy sits with our Human Resources and Legal functions, with periodic reporting to the Board as appropriate.

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:

- an external training provider provides specific training on slavery and human trafficking to certain colleagues working within HR and other relevant functions (as we consider that, if there were any potential slavery or human trafficking within our business or supply chains, they would be the individuals most likely to encounter it); and
- we will continue to promote internal and external communication of this issue throughout our business.

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 during the financial year against the following key performance indicators:

- **Incidence.** The number of incidents of slavery or human trafficking in our supply chain of which we are aware in the past year (i.e. zero).
- **Whistleblowing.** The number of reported breaches in the past year (i.e. zero).
- **Remedial action.** The instances of remedial action being needed in the past year (i.e. zero).

Going forward, we will use the following additional 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:

- **Supplier/Contractor Certifications.** The number or percentage of existing and prospective suppliers and contractors that have provided slavery and human trafficking certifications.
- **Training.** The number or percentage of colleagues within the organisation who have received specific training on modern slavery and human trafficking.

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 2025. It was approved by our board on 19 March 2026.

JOHN-PAUL SAVANT (Director)
CHIEF EXECUTIVE OFFICER

Date: 19 March 2026