

# Code of Conduct

of

TimeLine Auctions Limited, The Court House, 363 Main Road, Harwich, Essex, CO12 4DN, UK, also called the Company

## ACCORDING TO THE PREMISES THAT

- TimeLine Auctions Limited [TimeLine] is a business company working in the field of the ancient art and coins, generating its income (principally) by auctioning items belonging to private and corporate owners;
- TimeLine is a member of AIAD (Association of International Antiquities Dealers) and as such wants to create its own code of conduct.

## THEREFORE

In consideration of the premises outlined herein

- TimeLine decides to adopt the following code of conduct based on the highest trade standards, being a company in an important position of trust in relation to its audiences, owners, local communities, donors, source communities, partner organisations, sponsors and funders;
- the code will support those who work in the company in recognising and resolving ethical issues and conflicts. It sets out the key principles and the supporting actions that TimeLine aims to achieve to ensure an ethical approach to its work;
- the code is fixed according to the following points and articles:

## SECTION 1: GENERAL PRINCIPLES

1. As an AIAD member, TimeLine promotes the lawful trade in antiquities and opposes any illegal or unethical trading and the illegal removal of antiquities from their countries of origin, as a key principle and cornerstone of its activity;
2. The code applies when dealing with authorities, to those who work for TimeLine, paid or unpaid, to consultants and those who work freelance, and to those who work for governing organisations that support, advise or provide services to TimeLine. Those working in associated sectors may also choose to adopt this code. They should observe the spirit, as well as the letter, of the code, demonstrating the serious commitment of this company and its employees, helping to prevent unlawful trading in antiquities;
3. TimeLine aims to act proactively to champion ethical behaviour. All staff, volunteers and consultants should be introduced to this code in order to integrate its principles into their daily work. TimeLine will set up its own internal structure to ensure ethical oversight, and will use this code as a reference for decision-making;
4. All of TimeLine's staff and internal and external collaborators are required to read and be familiar with this code of conduct and to use it to guide them in all aspects of their work. It is the responsibility of each individual to adhere to the Code of Conduct. If any doubt on the application of the code arises, it is important to speak out whenever a question or concern emerges;
5. TimeLine promotes the present code and its wider application within its structure so that all of its employees, consultants and any involved personnel should be able to demonstrate awareness of it and the ways in which it should be used.

## SECTION 2: PUBLIC ENGAGEMENT

6. TimeLine and those who work for and with it should:

- a. actively engage and work in partnership with existing audiences and reach out to new and diverse audiences;
  - b. treat everyone equally, with honesty and respect;
  - c. provide and generate accurate information for and with the public;
  - d. support freedom of speech and debate;
  - e. facilitate the use of objects also for public benefit - learning, scholarship, inspiration and enjoyment.
7. All those who are working in the company should:
- a. provide public access to, and meaningful engagement with, museums, collections, scholars and information about collections and items without discrimination, having respect for the activity of the company and privacy of clients;
  - b. conduct business with integrity and in keeping with the central values of this code; TimeLine, along with its employees and collaborators, is committed to operate with clear and firm ethical standards every day in every transaction;
  - c. support free speech and freedom of expression. Respect the right of all to express different views within the company unless prohibited by law;
  - d. take reasonable steps to ensure that information and research presented or generated by the company, about collections and items, is accurate. Take reasonable steps to minimise or balance bias in research undertaken on its behalf;
  - e. conduct its business in such a way as to bring no discredit to the AIAD or its members or the trade in general and to co-operate with international and national law enforcement agencies whenever applicable;
  - f. work in partnership with communities, audiences, potential audiences and supporters of the company;
  - g. ensure that everyone has the opportunity for a meaningful participation in the work of the company, according to their position inside it or towards it;

### SECTION 3: LEGAL MOVEMENT AND SALE OF PROPERTY

8. TimeLine and those who work for and with it should comply with all applicable laws, regulations and restrictions in the import or export of art, cultural objects, property, services, information or technology, wherever they operate in the world; therefore they should:
- a. acquire and care for the items and objects with transparency and competency in order to generate knowledge and, if appropriate, engage the public and the international scientific community with the cultural content of the objects, even when the objects are only temporarily held by TimeLine on behalf of the owners;
  - b. if TimeLine is not normally engaged in the shipping of antiquities, but if and when it is required to do so, it will abide by the export laws of the country from which the antiquities are shipped;
  - c. TimeLine must ensure compliance with all other national laws affecting the movement of goods - including (but not limited to) rules governing the movement of cultural heritage and other culturally sensitive materials, and the movement of the items to, from, or originating in countries subject to trade embargoes or sanctions;
9. If TimeLine is involved in the movement of property across international borders all those who are working for the Company should comply with:

- a) all applicable export control requirements including licensing requirements for art and cultural property;
- b) all legally imposed restrictions on conducting business with other countries, including economic sanctions and prohibitions;
- c) the trade laws and regulations associated with the countries in which they conduct business;
- d) the obligation to declare items honestly and accurately for customs purposes;
- e) balance the company's role in safeguarding the documentation of the items for the benefit of future audiences with its obligation to optimise access for present audiences.

#### SECTION 4: DUE DILIGENCE IN PROPERTY SALE

##### 10. TimeLine should:

- a) conduct due diligence to verify the ownership of any item prior to accepting it, and to ensure that the current holder is legitimately able to transfer title. Apply the same strict criteria to gifts and bequests;
- b) reject any item if there is any suspicion that it was wrongfully acquired during a time of conflict; stolen; illicitly exported or illicitly traded, unless explicitly allowed by treaties or other agreements, or where the company is co-operating with attempts to establish the identity of the rightful owner(s) of any item;
- c) discuss expectations and clarify in writing the precise terms on which all parties are accepting transfer of title. Exercise sensitivity towards vendors when accepting or declining material;
- d) deal sensitively and promptly with requests for repatriation both within the UK and from abroad;
- e) ensure transparency and carry out any duty openly, according to unambiguous, generally accepted procedures;
- f) conduct auctions in an honest, fair, ethical and transparent manner, in accordance with laws applicable in the jurisdiction in which they are held.

##### 11. Before offering property for sale, TimeLine should have conducted the level of due diligence required to establish that the property is authentic and that there are no known legal obstacles for selling and passing titles, according to any domestic and international laws that govern the markets for archaeological and cultural property; therefore TimeLine should:

- a) be in good faith throughout all transactions;
- b) record each transaction with diligence and keep records for a minimum of 7 years.

##### 12. When TimeLine acquires objects from auction houses or dealers, it should record the transaction and note the provenance as provided.

##### 13. When TimeLine is acquiring or receiving items it has to establish the identity of the vendor and proof of address. TimeLine should request photographic identification and retain a copy of it. TimeLine should establish:

- a. the name and address of the vendor;
- b. a warranty that the vendor has good title to the objects;
- c. confirmation of where, when and how the objects were acquired, as can be provided by the vendor;
- d. where the vendor acquired the objects outside the United Kingdom, confirmation that the item has been exported or imported in conformity with local laws.

#### SECTION 5: LAWFUL TRADING

##### 14. TimeLine should undertake to carry out due diligence to ensure, as far as it will be able to, that objects are not stolen from excavations, architectural monuments, public institutions or private property and are lawfully on the market for sale;

15. TimeLine will make all reasonable enquiries to ascertain earlier ownership history of any object it is considering for auction, mindful that the illicit removal of archaeological objects from their original context is damaging to the general knowledge and understanding of the past;
16. TimeLine will perform the duty to record and preserve relevant prior ownership history of any given object along with any supplied evidence;
17. TimeLine has to record the full details of each and every business transaction, in a complete, reliable and accurate way, and never make any false or artificial entries in its books and records.

#### SECTION 6: OTHER DUTIES

18. TimeLine and those who work with or for it should:
  - a. not dismantle or sell separate parts of one complete object;
  - b. record all repair or restoration works carried out on any item and keep, as appropriate, photographic records of objects prior to repair and restoration;
  - c. to keep together objects that were originally meant to be kept together;
  - d. seek to verify the authenticity of all objects offered for sale;
  - e. adhere to the principles of the Hague Convention and pay particular attention to items that may have originated from conflict zones: in these instances further assurances and/or documentation should be sought from the seller to ensure that the objects have been in circulation outside the conflict zone prior to the conflict;
  - f. TimeLine shall comply with local laws wherever they operate and ensure it is familiar with the relevant legislation;
  - g. TimeLine will comply with the discipline for code violations of AIAD.

#### SECTION 7: ANTI-MONEY LAUNDERING AND TERRORIST FINANCING, IMPROPER PAYMENTS

19. TimeLine and those who work in and with it should:
  - a) assist in fighting against money laundering and terrorist financing, which continues to be the focus of considerable attention by governments, international organisations and law enforcement agencies around the world;
  - b) comply with all the applicable laws regarding anti-money laundering and combating terrorist financing;
  - c) not engage in any form of bribery, including offering, soliciting or accepting anything of value, directly or indirectly, that is given with the intent of obtaining or retaining business or securing services, independently from the amount;
  - d) maintain accurate books and records and not hide or obscure or disguise the nature or purpose of a payment or source of funds;
  - e) TimeLine must be cautious to avoid bribery when dealing with government officials, including officials of international organisations and political parties, as well as employees of state-owned companies. This can include employees of companies and joint venture partners that have been nationalised, or have significant government ownership stakes;
  - f) TimeLine should not offer or promise anything of value to influence the actions or decisions of, or to obtain any improper advantage with, government employees or government bodies.

#### SECTION 8: INDIVIDUAL AND INSTITUTIONAL INTEGRITY

20. TimeLine and those who work for and with them should:
  - a) uphold the highest level of institutional integrity and personal conduct at all times;
  - b) build respectful and transparent relationships with private owners, partner organisations, governing bodies, staff and volunteers to ensure public trust in the company's activities;
  - c) avoid any private activity or pursuit of a personal interest that may conflict or be perceived to conflict with the public interest without impacting on the main activity of the company, which is the selling of ancient artefacts;
  - d) consider the effect of activities conducted in private life on the reputation of the company;
  - e) make clear when communicating personally or on behalf of another organisation that views expressed do not necessarily represent those of TimeLine.

## SECTION 9: CONCLUSIONS

21. This Code cannot contain all the answers to the ethical issues that TimeLine will face. Some actions that constitute a breach of the code will be more clearly distinguishable than others. However, in all cases, TimeLine should conduct a process of careful reflection, reasoning, and consultation with others, as well as consulting further detailed guidance on key areas of practice prepared by the AIAD and other bodies, related to obligations arising from any contractual relationship there may be with an employee or client.
22. The Code of Conduct set out here defines standards that are often higher than those required by law. However, the code cannot override the legal obligations and rights of those who work in or for the company, including those arising from any contractual relationship there may be with an employee or client. This Code of Conduct must be subordinate to the legal powers and obligations of governing bodies and the legal powers and obligations of individual members of such bodies.

Approved in Harwich on 29.07.2020

For and on behalf of TimeLine Auctions Limited