

PORTMEIRIONGROUP

Portmeirion Group PLC

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Transparency Statement on Human Trafficking and Modern Slavery (the "Statement") (in compliance with the Modern Slavery Act 2015)

Portmeirion Group PLC and its subsidiary companies are committed to preventing acts of modern slavery and human trafficking within its business and supply chains, and expects the same high standards from its suppliers. We recognise that modern slavery can take many forms and so regularly evaluate and, where necessary, try to reduce the nature and extent of our exposure to the risk of modern slavery and human trafficking within our business. While we are confident that the risk of slavery and trafficking within our group and supply chain is low, we continue to evaluate and, where necessary, improve our policies and procedures to ensure that the risk is as low as possible.

This Statement details the measures taken by Portmeirion Group PLC, which includes our UK operating subsidiaries Portmeirion Group UK Limited and Wax Lyrical Limited, to prevent modern slavery within our business and supply chains for the financial year ending 31 December 2019.

1. Our business and supply chains

We are a U.K. public limited company with a global presence in the homewares sector. We are the ultimate parent company of the Portmeirion Group, directly employ around 900 people worldwide and sell into over 70 countries. Our largest operations are in the U.K. where we employ around 770 people. Together with the products that we produce in our own factories within the U.K, we work with a range of suppliers to design, manufacture, package and transport our products around the world.

2. Managing the risk

2.1 Supply chain

We have a Supplier Code of Conduct which states that employment should be freely chosen and that forced, bonded or child labour cannot be used. Our Code is based on the Base Code of Labour Practice of the Ethical Trading Initiative ("ETI") which itself is based on the standards of the International Labour Organization. Our product supplier contracts contain, as standard, binding clauses enforcing our Supplier Code of Conduct and retaining our right of audit and inspection of our product supplier's premises and records. Our Code aims to ensure that international human rights standards are respected at all our suppliers' sites.

Compliance with the Code of Conduct is reviewed by using a tailored questionnaire that complements our Code and by regular visits to suppliers' premises by our staff. Our product suppliers are also required to complete an ethical audit every two years. Representatives from our U.K. sourcing team visit supplier's premises at least annually where we perceive those suppliers to be at a higher risk of instances of modern slavery.

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2.2 Employment practices

Our global recruitment and employment practices contain measures to ensure there is no forced labour. These measures include:

- due diligence checks on UK recruitment agencies;
- background checks in relation to new starters to our business relevant to the jurisdiction they will be working in;
- encouraging employee vigilance to the risks and signs of modern slavery and human trafficking and to report any instances or suspicions using the procedures set out in our Whistleblowing Policy as soon as they arise; and
- training of relevant colleagues, particularly in HR functions, to ensure they are equipped to identify and recognise any potential instances of modern slavery. Training is conducted formerly through online training and assessments as well as through on the job mentoring.

Our Group Whistleblowing Policy applies to employees, contractors and anyone else acting on Portmeirion Group's behalf. If a report of actual or suspected modern slavery was made, we would conduct such investigations that we could reasonably do including, where required, liaising with law enforcement officials.

We do not tolerate any slavery or human trafficking within our business. If we find evidence of slavery and/or human trafficking in our supply chain, we will immediately seek to terminate our relationship with the relevant supplier and will liaise with law enforcement as required.

3. Further Action

In the next 12 months we will continue to strengthen our approach to raising awareness, and managing the risk, of modern slavery within our business and supply chain and ensure our strategy is responsive to changing risks.

We know that identifying potential and actual cases requires understanding of the drivers of modern slavery as well as the possible indicators. During 2020, we will extend our employee training and awareness programme to ensure the high standards we expect are consistently applied outside the U.K. This will involve closer liaison with our Chinese subsidiary and newly acquired subsidiary in the US, Nambé LLC. As part of our other good corporate governance reminders, such as on anti-bribery, we will remind suppliers of our expectations and direct access to our Group Company Secretary to confidentially report or discuss any concerns in respect of modern slavery or human trafficking through our whistleblowing procedures.

We believe that Portmeirion Group is effective in combating modern slavery and human trafficking within our business and supply chains through our approach to supply chain management and in promoting awareness of the issue and a transparent culture with our employees.

The contents of this statement are approved by the Board of Directors.



Mike Raybould
Chief Executive
Portmeirion Group PLC
14 January 2020