

PORTMEIRIONGROUP

Portmeirion Group PLC
Registered Office: London Road, Stoke-on-Trent, ST4 7QQ, England
Tel: +44 (0) 1782 744721 Fax: +44 (0)1782 744061

www.portmeiriongroup.com

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 2020. This is our third Modern Slavery Act Statement. It builds on our prior statements to demonstrate our continued commitment to address modern slavery and other human rights risks throughout our global operations and value chain.

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 810 people worldwide and sell into over 70 countries. Our largest operations are in the U.K. where we employ around 680 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 Our policies

The Group's established values underpin everything we do. Our vision to be a leading force in the global homeware sector will only be achieved through a culture of honesty, integrity and openness and by respecting human rights and the interests of our employees, customers and stakeholders. The Group has policies which support its commitment to combat modern slavery; these include those on diversity and inclusion, harassment and bullying, recruitment, anti-bribery, whistle-blowing and work-life balance.

2.2 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 supplier's sites. If issues are found in supplier audits, our initial goal is to work with the suppliers to bring their practices into compliance.

PORTMEIRIONGROUP

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

2.3 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 and management functions, to ensure they are equipped to identify and recognise any potential instances of modern slavery. Training is conducted formally through online training and assessments as well as through on-the-job mentoring.

2.4 Impact of the Coronavirus pandemic

Throughout the Covid-19 pandemic we have endeavoured to identify and address any additional risk to our operations and supply chains. The health and safety of our employees, contractors and visitors to our sites has, as ever, been paramount. We have kept in close contact with our sourced product suppliers to identify any fluctuations in demand that could lead to new or increased risks of labour exploitation. Unfortunately our sourcing team have not been able to make supplier visits during 2020 due to travel restrictions. We have paid all suppliers within agreed terms, enabling them to pay their employees in a timely manner. At each Board meeting, the Directors review the significant risks and mitigants to the Group. As part of this review, emerging or heightened risks are identified, including those related to the pandemic and modern slavery generally.

3. Reporting & Action

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. Our subsidiary company HR Directors and Group Company Secretary are available for all employees, contractors and other stakeholders to confidentially report or discuss any concerns in respect of modern slavery or human trafficking through our whistleblowing procedures.

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.

4. Further Action

We want to ensure that our high standards are applied consistently within and outside the UK. We are developing a formal process to be consistently adopted in all our subsidiary companies, to raise awareness, identify and manage the risk of modern slavery

PORTMEIRIONGROUP

within our business and supply chain, highlight clear access to confidential reporting and ensure our strategy is responsive to changing risks.

During 2020, we continued our employee training and awareness programme. No instances of modern slavery were identified or reported.

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

12 January 2021