

# PORTMEIRIONGROUP

Portmeirion Group PLC

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## **Transparency Statement on Human Trafficking and Modern Slavery (the “Statement”) (in compliance with Section 54(1) of the Modern Slavery Act 2015)**

***Portmeirion Group is a purpose-driven business with heritage and family at our core. We have a responsibility to our employees, customers, communities and the people that bring our products into their homes, and we work hard to reflect this in everything we do.***

***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.*** While we are confident that the risk of slavery and trafficking within our Group and supply chain is low, we recognise that modern slavery can take many forms and so we continue to regularly evaluate and, where necessary, try to reduce the nature and extent of our exposure to the risk within our business. We aim to operate in a sustainable and ethical way for our people and communities as we believe this is not only the right thing to do but it is also critical to the long-term health of our business and the world we operate in.

This Statement details the measures taken by Portmeirion Group PLC, which includes our U.K. 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 2024. This is our seventh Modern Slavery Act Statement.

### **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 661 people worldwide and sell into over 60 markets. Our largest operations are in the U.K. where we employ around 537 people and in the US and Canada where we employ around 117 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. There have been no structural changes since our last statement.

### **2. Our policies**

Our vision to be a leading force in the global homewares 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 all other stakeholders. We promote an open culture in the business achieved from effective employee engagement, people development and diligent resource management. We are a caring employer with an

excellent health and safety record, fair and balanced equality policies, a wide diversity in our workforce and management structures and a consultative approach with our people.

The Group has policies which set out our expectations and requirements and support our commitment to combat modern slavery and human trafficking; these include those on diversity and inclusion, harassment and bullying, recruitment, anti-bribery, whistleblowing, work-life balance and flexible hybrid working.

### **3. Due diligence processes**

Our procedures are designed to establish and assess areas of potential risk, monitor potential risk areas and reduce the risk of slavery and human trafficking occurring in our business and supply chains, whilst providing adequate protection for whistleblowers.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring, we have the following due diligence procedures:

#### **3.1 Supply chain**

We have a Supplier Code of Conduct ("Code of Conduct") which requires that employment should be freely chosen and that forced, bonded or child labour cannot be used. Our Code of Conduct 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 ("ILO"). Our product supplier contracts contain, as standard, binding clauses enforcing our Code of Conduct and retaining our right of audit and inspection of our product suppliers' premises and records. Our Code of Conduct aims to ensure that international human rights standards are respected at all our suppliers' sites. If issues are found in supplier audits, our initial goal is to work with the suppliers to bring their practices into compliance.

Compliance with the Code of Conduct is reviewed using a tailored questionnaire that complements the Code, and is supplemented with visits to suppliers' premises by our staff or representatives. We continue to have external SMETA 4 pillar audits on all of our product suppliers to ensure they are working within ETI guidelines. These audits are carried out every two years. Sedex Members Ethical Trade Audit ("SMETA") is the audit procedure created by the Sedex membership, which is a compilation of good practice in ethical audit technique. The Supplier Ethical Data Exchange ("Sedex") is a not-for-profit, membership organisation that leads work with buyers and suppliers to deliver improvements in responsible and ethical business practices in global supply chains. The SMETA 4 pillar audit consists of four key pillars: Labour Standards, Health & Safety, Environment and Business Ethics and is based on both international standards and ILO conventions.

#### **3.2 Employment practices and training**

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

- due diligence checks on U.K. 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.

#### **4. Risk assessment and management**

Portmeirion Group regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its business and supply chain through a review of its due diligence processes.

We recognise that some of the geographical areas in which our suppliers are located may be regarded as high risk locations but where this is so, we believe that we have mitigated those risks through the due diligence processes outlined above.

**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.**

#### **5. Grievance mechanisms, reporting & effectiveness**

Whistleblowing is an effective way of identifying risks of modern slavery. 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 is made, we would conduct such investigations that we could reasonably do including, where required, liaising with law enforcement officials. Our Global HR Director and Group Company Secretary are available for all employees, contractors, suppliers and other stakeholders to confidentially raise concerns in relation to improper, unethical or illegal practices and can be reached at [whistleblowing@portmeiriongroup.com](mailto:whistleblowing@portmeiriongroup.com). We are committed to dealing with all whistleblowing reports and ensure those who raise concerns are protected from retaliation.

No instances of modern slavery were identified or reported in 2024.

#### **6. Training**

We invest in educating our employees to recognise the risks of modern slavery and human trafficking in our business and supply chains, and to understand the appropriate actions to take if they suspect a case of modern slavery or human trafficking.

During 2024, we continued our employee training and awareness programme. Training is conducted formally through online training and assessments, as well as through on-the-job mentoring.

#### **7. Looking Ahead**

Whilst we are proud of our continued efforts to support and protect the human rights of every person involved in our operations and our supply chain, we are not complacent to the risks and look to highlight awareness as far as practical. This year, we intend to again mark Anti-Slavery Day in October 2025, sending out tailored communications to employees and sourced product suppliers to help them understand and spot the signs of modern slavery and human trafficking. We also intend to enhance the training provided to key departments within the business by providing interactive training based upon case studies of actual modern slavery incidents.

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.

**This statement was approved by the Board of Directors on 25 March 2025.**

A handwritten signature in black ink, appearing to read 'm raybould', with a long horizontal flourish extending to the right.

**Mike Raybould**  
**Chief Executive**  
Portmeirion Group PLC  
25 March 2025