

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 (in compliance with the Modern Slavery Act 2015 (the "Act"))

Portmeirion Group PLC and its subsidiary companies are committed to preventing acts of modern slavery and human trafficking within its businesses and supply chains, and expects the same high standards from its suppliers. We have used a Supplier Code of Conduct for a number of years now, both within our group and with our commercial partners. While we are confident that the risk of slavery and trafficking within our group and supply chain is low, we acknowledge that there are further steps that we can take to ensure that the risk is as low as possible.

1. About Portmeirion

We are a publically limited company with a global presence in the homewares sector. We are the ultimate parent company of the Portmeirion Group, which includes the UK operating subsidiaries Portmeirion Group UK Limited and Wax Lyrical Limited. At the time of writing, we directly employ around 800 people worldwide and have business operations in over 60 countries.

2. Recognising the Risk

Modern slavery can take many forms and can extend to poor working practices and conditions. We recognise this and 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.

3. Managing the Risk

3.1 Supply Chain Management

Together with the products that we produce in our own factories, we work with a range of suppliers to design, manufacture, package, transport and sell our products around the world. As part of our commitment to ethical business practices, including combating modern slavery, we require our product suppliers to comply with a Supplier Code of Conduct, or to at least have a code of their own which is substantially similar.

Our Code of Conduct states 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"), an organisation which brings corporate, trade union and Non-Governmental Organisations together in a unique alliance to tackle ethical issues. The ETI's Base Code is itself based on the standards of the International Labour Organization.

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.

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3.2 Employment Practices

With respect to the global recruitment and employment of our own people we have implemented a number of measures as part of our commitment to ensuring there is no forced labour. These measures include operating due diligence checks on the UK recruitment agencies we work with and undertaking background checks in relation to new starters to our business relevant to the jurisdiction they will be working in.

We encourage our employees to remain vigilant to the risks and signs of modern slavery and human trafficking and to report any instances or suspicions to our Human Resources Director as soon as they arise. If such a report was made, we would conduct such investigations that we could reasonably do including, where required, liaising with law enforcement officials. Our Whistleblowing Policy applies to employees, contractors and anyone else acting on Portmeirion Group's behalf.

Taken altogether, our procedures seek to:

- establish and assess areas of potential risk in our business and supply chains;
- monitor potential risk areas in our business and supply chains;
- reduce the risk of slavery and human trafficking occurring in our business and supply chains; and
- provide adequate protection for whistleblowers.

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

Following our latest review of our policies and procedures we have identified the following further action to take over the next financial year:

- ensure all subsidiary companies insert binding clauses as standard into product supplier contracts enforcing our Code of Conduct;
- retain rights of audit and inspection of our product supplier's premises and records to ensure compliance with our Code of Conduct; and
- update and renew staff training on ethical business practices, including modern slavery and human trafficking, for those employees who may be affected.

We believe that Portmeirion Group is effective in combating forced labour within our businesses and their supply chains through our approach to supply chain management and in promoting a transparent culture with our employees.

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



Lawrence Bryan
Chief Executive
Portmeirion Group PLC
7 March 2017