

# 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. 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 2018.

### **1. About Portmeirion Group PLC**

We are a publically limited company with a global presence in the homewares sector. We are the ultimate parent company of the Portmeirion Group, and at the time of writing, we directly employ around 800 people worldwide and have business operations in over 60 countries.

### **2. Recognising the Risk**

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.

### **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 and transport 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.

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 supplier's premises and records. 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.

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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 using the procedures set out in our Whistleblowing Policy 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:

- review our Code of Conduct and accompanying questionnaire to ensure these are suitably robust; and
- update and renew staff training on modern slavery and human trafficking for those employees who may be affected.

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.**



Lawrence Bryan  
Chief Executive  
Portmeirion Group PLC  
15 January 2019