

Modern Slavery Act Statement: Pulsant Limited

Year Ending 31st December 2022

Our commitment:

As a technology company operating in the UK, Pulsant has a zero-tolerance approach to modern slavery and human trafficking and is fully committed to acting with integrity and ethically in all business relationships. We recognise responsibility as a business to promote just and equitable treatment of people within our supply chain and ensure that there is no business involvement in modern slavery either directly through our own operations or indirectly by association through the supply chain.

Our processes:

Pulsant deploys systems and controls to prevent modern slavery from presenting itself anywhere within the business or the supply chain. Modern slavery risk is reviewed at onboarding for all new suppliers as well as through routine review. Our Supplier Code of Conduct outlines our expectations in relation to human rights issues in sourcing, working conditions, welfare and ethical business conduct. In addition, we review the approach of technology hardware brands as part of our vendor sustainability strategy, using publicly available information such as KnowTheChain Information and Communications Technology benchmarking data set.

Pulsant encourages any individuals to raise any concerns that they may have about risk of modern slavery or human trafficking through our whistleblowing policy. Reporting details are provided of escalation routes, including to our third-party confidential hotline, and to external authorities. Anyone who makes a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure. Any matters raised are investigated thoroughly, promptly, and confidentially, and the outcome of the investigation reported back to the individual who raised the issue.

Our risk profile:

As a technology company operating in the UK, we have assessed our risk of engaging with slavery and exploitation and identify three key areas of focus:

- **Our people** – because we have direct control and responsibility in relation to working conditions.
- **Technology procurement** – because while we predominantly source from big-name vendors, this represents the most significant element of manufactured goods purchased, and technology manufacturing in several countries is considered high-risk.
- **Construction, security & cleaning services** – because these are higher risk sectors that we engage with directly in relation to the operation of our UK facilities.

Our KPIs in 2022:

KPI	Result
100% training completion for procurement & assurance teams in relation to modern slavery risk management.	100% completion
100% training completion for facilities management in recognising and actioning signs of labour abuse.	78% completion <small>(achieved 100% as of Jan 2023)</small>
Assessment supplier approaches to modern slavery covering at least 75% spend and 100% of high-risk supplier categories.	85% of spend

Low-spend providers in cleaning, construction & security sectors were assessed and engaged in 2021. Re-engagement deferred until 2023.

Going forwards:

In 2023 we aim to continue monitoring against the following Key Performance Indicators:

- 100% training completion for procurement & assurance teams in relation to modern slavery risk management.
- 100% awareness completion for facilities management in recognising and actioning signs of labour abuse.
- Assessment supplier approaches to modern slavery covering at least 75% spend and 100% of high-risk supplier categories.

The CFO has responsibility for ensuring this statement complies with all legal and ethical obligations.

This statement has been reviewed and approved by the legal directors on 11th May 2023.

Signed

Brad Petzer
Chief Financial Officer