



# Corporate Governance & Sustainability Report

2022

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# Statement from our CEO

As the creator of the UK's edge platform infrastructure, providing access to secure and scalable distributed cloud, colocation and networking solutions to businesses in every region of the UK, we are trusted to deliver by about 2000 organisations across the private and public sectors. We have extensive experience in delivering to many industry sectors subject to heavy regulation, which means we set high expectations internally and with partners and suppliers in relation to security, service availability and quality of support. Our governance structures exist to ensure that while we are driving service excellence, we are connected with our impacts and act in accordance with our Values.

I take pride in the progress made by Pulsant during 2022 as we developed our business. We have taken stock and focussed on our identity as the UK's edge platform, as well as our impact on our people and our planet, and our vision of where we are going in the future. Our people have really made things happen; in welcoming our new team members and sites in Manchester and Reading South we have taken on new skills and perspectives. We have seen huge activity led by our Talent team to promote our wellbeing, such as the health checks programme, and once again our people have driven a programme of charitable work and fundraising activities. While we position ourselves for growth, we

must understand our wider impact, not least environmental challenges. In committing to Net Zero and our Science-Based targets, Pulsant affirms that we must drive rapid efficiencies, phase out greenhouse gas emissions, and recognise the true value of natural resources, while using our wider influence positively.

We are fully committed to meeting our responsibilities to our clients, but also to our people, investors, and the wider community. Connectivity and technological innovations have a key part to play in the drive to decarbonise and protect our natural resources for future generations. Along with my executive and senior leadership teams, I believe in delivering for our clients, while also maintaining ethical and regulatory compliance, supporting our people and communities, and working towards a sustainable planet.

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**We are fully committed to meeting our responsibilities to our clients, but also to our people, investors, and the wider community**



**Rob Coupland**  
Chief Executive Officer

# Supporting Our People & Communities

## Wellbeing

We believe that actively supporting the wellbeing and happiness of our people is critical to our success. As part of our wellbeing program, we provide access to a range of resources covering mental, physical, and financial aspects, including webinars and workshops with external speakers and support helplines. We currently have 16 qualified Mental Health First Aiders that actively engage and support our people. Wellbeing is actively monitored by our leadership teams across Pulsant through our people surveys.

The wellbeing of our people is of key importance to us. Hearing what is on their minds and how we can best support them helps us scope our wellbeing programme for the year. Based on feedback, we had a number of initiatives and awareness sessions on health and we partnered with a Third party, 'We are Wellbeing' to support us with this. This included Health Check's in person on our various sites where people had the opportunity for a physical check-up, as well as educational sessions on men's health, the menopause, healthy eating, better sleep, understanding stress and a number of more physical opportunities. From 'Walk and Talk' opportunities, weekly HIIT classes that are open to all and run virtually to

the much larger and more competitive physical challenges such as travelling "Around the World" where teams joined together virtually to travel the distance and achieve a collective goal.

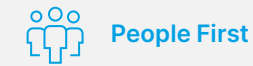
We had a Company Wellbeing Day; a day where we continued to support our clients and our data centre running as normal, however as many people as possible were off across Pulsant allowing for a long weekend and time away from laptops and phones. We were able to review our benefits and made the decision to extend a few within 2022. We have a company Cash Plan, which allows our people to access an 'Employee Assistance Programme' and also money off health support such as physiotherapy, optical and dental and we made the decision to extend this to include 8 face-to-face counselling sessions for everyone and know this has been beneficial to some. Our private healthcare also was expanded to include a full personal health check every 2 years for all.

With the cost-of-living crisis and financial pressures being felt across our teams, we were keen to do all we could for our people. We introduced a hybrid working contribution allowance for the second half of 2022 to help people with travel to our offices and Data

Centres. We also had various financial webinars, such as 'Financial Health', 'Budget Planning' and 'My Pulsant Rewards' to help people gain maximum discounts and efficiencies from the assigned Pulsant Platform, as well as simple things like a webinar on 'Understanding your Payslip'.

## Our Values

Our Values framework reflects how we want to work together in order to continue to build an even better place to work and deliver great service to our clients. Everyone is provided with guidance and examples on how the values can be applied, as well as training and further resources, and challenged to consider their own behaviours as part of the bi-annual performance review cycle. We recognise those who have shown strong examples of living our values.



People First



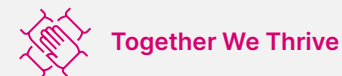
Own It



Make it Happen



Nurture & Grow



Together We Thrive

## Diversity & Equality

We are committed to providing equal opportunities in employment and to avoiding unlawful discrimination in employment and against clients. We have a working party across the organisation to focus on Diversity and Inclusion which throughout 2022 has been more focused on gender and women in Technology and to help to develop initiatives and drive awareness across the wider business. For further information, please refer to our Gender Pay Gap report on [www.pulsant.com](http://www.pulsant.com)

Ensuring Pulsant is a welcome place to be, where everyone feels they can be themselves and they are supported and treated fairly is something that is very important to us. Whilst our aim is to attract diverse talent to join our Pulsant team, this is about making sure we are sharing information on what it is like to be within Pulsant widely and trying to attract diverse talent to join our team. We review our job adverts via a tool to assess language to help improve our reach.

Throughout 2023, we will focus on trying to expand our reach and appeal in relation to gender and a focus on neurodiversity and how we can best support our people, with a plan to cover other areas such as Multiculturalism. As we continue to focus on gender and diversity, our ambition for 2023 is to increase diversity to 18%, with the ambition to achieve 20% of females and ethnic mix aligned to geographies by 2024. We look to build on the Women in Technology initiatives and continue to celebrate events such as International Women's Day and attend events such as Women in Technology Festival.

## Training & Development

First impressions are a key element of the culture of an organisation, so we manage our induction program to embed a warm welcome and strong initial understanding of Pulsant's values and the fundamental policies that support them. Ongoing development is managed at an organisation and individual level, through periodic performance appraisals, role-specific needs, and annual awareness programmes.

Developing upon our learning and development culture has been a real focus for us within 2022. We recruited a Talent Manager to join our team who has been key to driving the focus on training and development and there were a number of really positive examples of us driving this forward within 2022. We established a new leadership development programme with various modules and opportunity for the various cohorts to come together in person and cover topics such as "Your Best Self" and "High Performing Teams." There were career anchor sessions which provided an opportunity for personal review, as well as a focused 'Personal

Development Week' which offered a variety of different workshops and sessions as well as leadership reviews to identify their 'top talent' and opportunities developed to support these people with their career journeys.

'Career Conversations' were introduced to allow our people to share their journeys both within and outside of Pulsant. Several people have been with Pulsant for a long period of time; some commencing as apprentices and progressing into management positions in more specialised areas such as Cloud. Through short interviews, they share their journeys and allows people to hear of varying approaches and opportunities.

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**Developing upon our learning and development culture has been a real focus for us within 2022**





## Health & Safety

Pulsant governs health and safety through our management system across all sites and functions, which is aligned with OHSAS45001. Comprehensive health and safety policies are in place and endorsed by our CEO, who is ultimately accountable for safety throughout the organisation. We maintain external consultancy to provide expert advice and carry out audits across all of our locations.

Site inductions are provided to all clients and contractors unless fully escorted, including awareness of welfare facilities and relevant emergency procedures. Contractors undertaking works on site are subject to permit-to-work requirements and submission of risk assessments / method statements.

Our people are made aware of their and the company's obligations for health and safety on induction and thereafter training is provided periodically and in accordance with their job role. Our safety committee ensure everyone is fairly represented and consulted on matters concerning their health and safety. Where high risk activities take place, risk assessments and documented safe working procedures are in place.

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**Comprehensive health and safety policies are in place and endorsed by our CEO**



## Giving Something Back

As part of our commitment to the wider community and our Giving Something Back programme, Pulsant increased the annual paid charity days available to our people to 2 days per year, allowing them to help with a charity that was personal to them, or to take part in a day that was arranged by Pulsant. In 2022 we contributed over £15,000 to worthy causes such as MacMillan; Children in Need, with a number of activities such as baking, and we matched our people's donations for Cash for Kids with

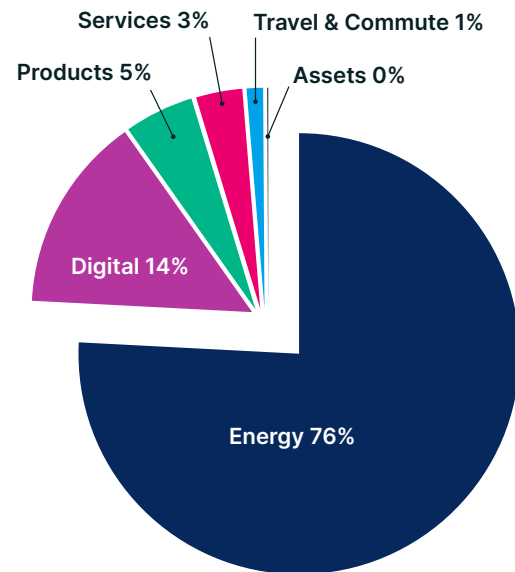
presents for children who would otherwise do without and where we could help make Christmas morning a happier time. We also had some groups in various geographies helping out in local foodbanks. Many were keen to raise funds for the people of Ukraine, and we were also able to donate some technical equipment in the form of laptops and desktops. Some used laptops made it as far as schools in Bangladesh, thanks to one of our colleagues' travels.

# Working Towards a Sustainable Planet

## Headlines

The protection of the planet is increasingly paramount in how we plan for the future. In 2022, we have made our commitment to Net Zero by 2050. During the year, we continued to develop our decarbonisation program while challenging ourselves to improve our operations' impact on the local and wider environment. We:

- Kept ahead of our emissions reduction trajectory; having reduced already by 29% of the 50% needed by 2030.
- Improved the efficiency of our data centre estate by 11% to reach a PUE of 1.56 and improved our planning for future targets
- Operated with zero environmental pollution incidents
- Commenced sustainability engagement program with our people and vendors
- Continued to offset direct emissions



2022 Carbon Emissions by Category

## Our Impact & Approach

As a major data centre provider, Pulsant is a large user of electrical power. While we procure renewable electricity, our carbon accounting uses the UK grid average emissions and includes fuel-and-energy-related (scope 3) categories, and therefore the power consumption represents by far (76%) the greatest source of greenhouse gas emissions.

We work to run as efficiently as possible, both in order to minimise the carbon footprint and to deliver cost-effective services to customers. We have set ambitious direct and indirect emissions reductions goals aligned with the Science-Based Targets initiative Net Zero Standard as a first and urgent step towards the net zero economy and limiting climate change to 1.5°C.

While we focus on our climate goals, and especially power usage, we also employ a robust ISO14001-accredited management system to ensure our wider environmental impact is understood and that we can operate our sites in line with industry best practices.



# Our Commitments

We have defined the following set of commitments as a framework for our objectives and future disclosures. We are committed to achieve Net Zero by 2050 as defined by the Science-Based Target's initiative Net Zero Standard, including through:

### Emissions:

- Reduce our carbon emissions across all scopes by 50% by 2030 (from 2019) on an absolute basis. In the long term, continue to drive reductions to achieve at least 90% reduction by 2050 and balance any remainder through supporting carbon removals.
- Offset 100% of our direct greenhouse gas emissions through assured, good quality projects.
- Maintain our supply of 100% renewable electricity. In addition, actively exercise our buying power to support sustainable UK grid infrastructure and innovative power technologies.

### Efficiency:

- Meet or exceed annual Power Usage Effectiveness (PUE) target of 1.3 by 2030.

### Value Chain:

- Fully and transparently manage the lifecycle impact of each product and service by 2025.
- Make resource efficiency, disposal, and carbon impact key considerations in procurement, and be an active participant in the circular economy.

### Culture:

- Together, make a positive difference to our environment and challenge ourselves to come up with creative solutions and outcomes to achieve enhanced sustainability.

### Governance:

- Hold ourselves accountable for meeting our environmental commitments. Deliver accountability through progressive improvement of our ISO14001-accredited management system and transparency of reporting.





## In our Data Centres

### Energy supply

In 2022, our twelve data centre sites consumed 88,906,263 kWh of electrical power, up from 72,144,345 kWh across ten sites during 2021. The increase was entirely due to the acquisition of two data centres in early 2022. 87% of power consumption was covered by Pulsant's renewable power agreement. The remaining non-renewable power purchased resulted from a continuing arrangement tied to a new acquisition and as of 2023, the power mix has returned to 100% renewable. We are further exploring our purchasing strategy and the potential for risk mitigation and additionality in renewable infrastructure.

# 2.5%

reduction in like-for-like  
power consumption

### Efficient operating infrastructure

Our twelve data centre locations present a range of operating efficiencies, as measured through PUE (Power Usage Effectiveness). While some locations have already met our target of 1.3, others still have a significant gap to close that will require structured investments. Throughout the year, we have focussed on making sure we have the best processes for systematically planning and managing our efficiency improvement, and now have a role dedicated to Data Centre Standards & Efficiency. We have the target of PUE 1.3 by the year 2030, which is in alignment to the Climate Neutral Data Centre Pact.

Our sites combined PUE in 2022 was 1.56; an improvement from 1.63 in 2021, which is in part due to the acquisition of the highly efficient Reading South Data Centre. In the rest of the estate, we achieved a 2.5% reduction in power consumption. One significant change was the consolidation of the Maidenhead site from two buildings into one: ensuring better infrastructure utilisation and a more resilient service for our clients. The biggest efficiency gains of our existing sites have been seen at our Milton Keynes and Newcastle Central locations following cooling infrastructure modernisations. All locations have commenced a program of temperature optimisation to reduce overall power demand and have individual site action plans to achieve the required improvements. Throughout 2023 we aim to continue infrastructure works while strengthening site team skills and processes.

### Direct emissions

Aside from power usage, we are looking towards cleaner technologies to minimise impacts around cooling, fire suppression, and standby power generation. We are progressing towards an elimination of FM200 fire suppressant gas by 2030. Despite preparations for grid blackouts during the winter, our standby generators were not required to support our sites in 2022 and so their impact was relatively low. Cooling refrigerant loss continues to be managed through frequent maintenance by our trusted service providers, and we have introduced our Cooling Procurement Standard to ensure early adoption of low-GWP systems when appropriate and available.

### Waste and the circular economy

We recognise it is becoming increasingly important to make efficient use of hardware resources and engage with the circular economy. Our security policy has been revised to allow for the secure erasure and re-use of data-bearing devices in line with industry standards, removing the need to physically shred the hardware unless contractually required. We have been engaging with a provider of refurbished and remanufactured technologies; and although in 2022 this represented less than 1% of hardware purchases, there is potential to engage further. End-of-life considerations are now included in the sustainability review of all business cases, as well as the sustainability evaluation of all hardware vendors.



## In our Services

Technology platform upgrades have been developed in 2022, resulting in the launch of platformEDGE™. Underlying this is a layer of upgraded technology that is expected to result in significant efficiency gains in relation to legacy platforms that are under decommissioning through 2023.

### Cloud sustainability

Cloud sustainability is a growing area of interest for clients. In a like-for-like comparison, shared cloud infrastructure makes more efficient use of the hardware and energy than dedicated infrastructure. However, the methodology reporting of cloud energy consumption and carbon footprint is not yet well-aligned in the industry, to allow for consistent, user-specific reporting. While we monitor the reporting and attribution developments, we aim to develop our technologies on platforms that demonstrate operating efficiencies relative to their predecessors and grow our understanding of their operating data.

## Our wider influence

Our people are powerful in embedding sustainability into the way we operate. They are in the position to hold us to account for our performance. They are also required to drive positive change. Throughout 2022 we have aimed to increase transparency of our environmental performance through news bulletins and updates. We held a '5S week' with a focus on eliminating waste in various forms, and we shared the sustainability journeys of some of our team members. We convene a regular call with data centre site leaders to review environmental issues and practices and have included environmental performance in our all-hands call. In 2023 we aim to develop environmental engagement further with more opportunities to get involved across the business and regional green forums, and strategies to promote decarbonised travel.

Our core vendors and suppliers vary in relation to their size and maturity. During the year, we developed an engagement framework to analyse the high-impact sectors and then

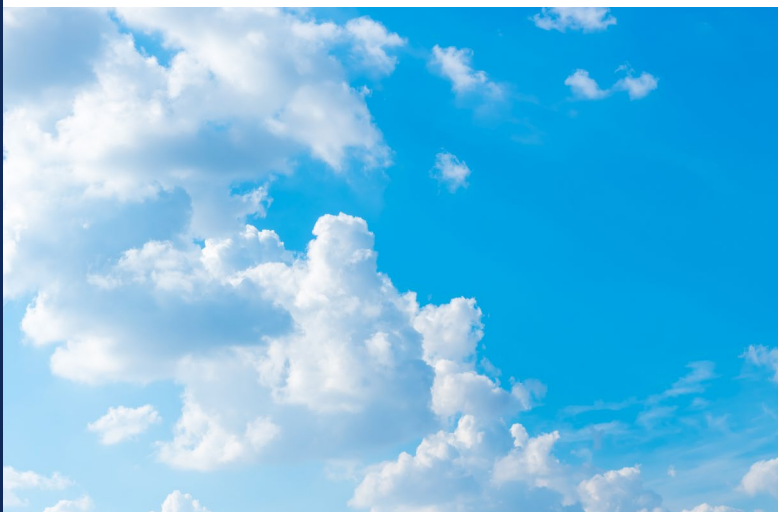
identify vendors who we can best influence in their maturity. We established positive engagement with 55% of targeted vendors and are pursuing this strategy in 2023 to develop direct relationships and drive meaningful improvements.

### Carbon Offsetting

We continue to engage with Climate Impact Partners, a specialist in carbon market solutions for climate action, through to offset 100% of Scope 1 emissions. Climate Impact Partners helps us ensure that our offsetting program is of the highest quality and delivers real impact, and projects are independently verified to assure emission reductions are occurring. In 2022, we supported a project supplying affordable water filters to families and schools in Kenya, as well as a global portfolio of renewable energy development projects.

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**We held a '5S week' with a focus on eliminating waste in various forms, and we shared the sustainability journeys of some of our team members**



## Climate-Related Risks & Opportunities

**Physically**, we foresee hotter periods and must prepare our cooling systems to cope without falling back on emergency measures. More frequent winds and storms present increased demand on building fabric, and network and power resiliency is increasingly important.

**Transition risks** include sourcing difficulties in relation to critical raw materials for information technology, electricity pricing volatility, and increasing statutory reporting. We work with third parties to monitor upcoming changes and ensure early awareness, as well as actively participate in TechUK's Data Centre Council, which gives us a voice in relation to emerging regulation.

**We also have enormous opportunities** to support technologies that do more with less, which benefits our society and planet.

Our platformEDGE™ infrastructure is uniquely placed to deliver the **UK's smart cities**. We support technologies that apply automation to building management and public services in order to help cities run more effectively while consuming fewer natural resources.

We also enable clients to access cloud computing that is local to them, thereby decommissioning legacy dedicated hardware and realising the efficiencies available through shared hardware models.

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**We also have enormous opportunities to support technologies that do more with less, which benefits our society and planet**





# Delivering on Security & Trust

## Accountability & Governance

The CEO is ultimately accountable and responsible for health & safety, quality, environmental, and security performance across the business. For current profiles of the executive leadership team please visit: Meet the Pulsant Team.

Further executive and business-wide accountabilities are outlined in our policies related to health & safety, quality, the environment, and information security, which are embedded throughout our operations by our integrated management system.

Pulsant operates a dedicated assurance team who report directly to the CFO. The Head of Risk and Assurance maintains oversight of governance systems throughout the business. Our specialist Cyber Security team, led by our Director of Cyber Security, provides technical expertise. The Head of Environment & Sustainability has specific responsibilities to oversee environmental performance and to drive our sustainability strategy throughout the business. Pulsant also engages with specialist third party health & safety support services.

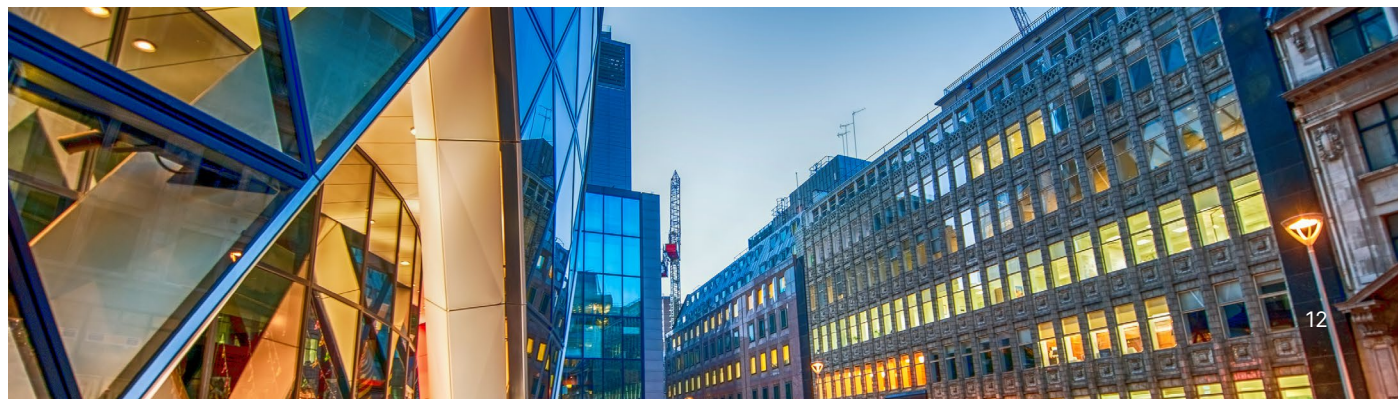
## Legal & Regulatory Compliance

Regular reviews and updates on applicable legislation and standards frameworks take place to ensure compliance across the business. Pulsant subscribes to and monitors a number of legal and industry information sources to maintain currency with compliance issues and changes and engages with specialist support as required.

We take seriously our obligations to not facilitate illegal activity including tax avoidance, money laundering, bribery, or corruption. To this end Pulsant has comprehensive Anti-Bribery and Corruption policies and supplier and client controls in place which are fully supported by executive leadership. Sanctions list checks and corporate criminal offence risk assessments are embedded into our operations.

## Whistleblowing

Pulsant maintains and communicates our Whistleblowing Policy and provides a whistleblowing facility via a third party. This encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run. Reporting details are also provided of escalation routes, including external authorities. A worker 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 worker who raised the issue.



## Modern Slavery

Pulsant recognises its obligations to prevent modern slavery and adheres to applicable employment legislation and principles of fair pay. We aim to maintain awareness in the relevant position to enable identification and management of human rights risk within our operations and supply chain. Our annual Modern Slavery Statement is published on [www.pulsant.com](http://www.pulsant.com)

## Client Experience

During 2022 we continued to operate our ITIL-aligned management processes, with a focus on robust change and risk management, incident response and problem management. Our client experience survey in Q3 gave us insight into how we can add more value for our clients and helped to shape our plans for 2023.

**4%**

**reduction of Infrastructure  
Major Incidents**

**98%**

**infrastructure change  
success rate**



## Information & Cyber Security

Pulsant prioritise the safety and security of our clients' assets, data, and operations. We are fully committed to implementing robust physical, information and cyber security measures, adhering to industry leading standards such as the NIST Cyber Security Framework, ISO 27001:2013 and PCI-DSS.

Pulsant's comprehensive approach ensures that sensitive information is protected at all levels. Our in-house Cyber Security team continuously monitors and evaluates our systems ensuring client data remains secure and confidential.

Cyber Security is important, but we recognise the need to ensure stringent physical controls to safeguard our facilities and infrastructure,

preventing unauthorised access and mitigation of potential risk. This includes, but is not exclusive to; restricted access, CCTV surveillance, biometric authentication, 24/7 security personnel and environmental monitoring.

We are committed to providing peace of mind, ensuring that assets, data, and operations are protected by state-of-the-art security measures. Our alignment to industry best practices provides confidence of effective controls to protect, detect, respond to, and recover from any potential threats or incidents.

## Assurance

A programme of internal audit is in place against management system requirements, with the output being reviewed by senior stakeholders and feeding to the continuous improvement processes. The results of risk assessments, post incident reviews and client and staff sentiment are also inputs into the continuous improvement process.

Our management system is further supported by external audit as part of our third-party accreditations, including ISO9001:2015, ISO14001:2015 and ISO27001:2013. Our program of external audits is planned across all data centre and office locations to cover in relation to the relevant aspects. For all independent accreditations and certificates held by Pulsant, please visit:

[www.pulsant.com/why-us/accreditations/](http://www.pulsant.com/why-us/accreditations/)

	ISO27001	ISO14001	ISO9001	PCI-DSS
South London	✓	✓	✓	✓
Edinburgh Newbridge	✓	✓	✓	
Edinburgh South Gyle	✓	✓	✓	✓
Edinburgh Sirius (Office)	✓		✓	
Edinburgh Medway	✓	✓	✓	✓
Gateshead Axis (Office)	✓		✓	
Manchester	✓	✓	✓	
Maidenhead	✓	✓	✓	✓
Milton Keynes	✓	✓	✓	✓
Newcastle Central	✓	✓	✓	✓
Newcastle East	✓	✓	✓	
Reading South	✓	✓	✓	
Reading TVHC	✓	✓	✓	✓
Sheffield	✓	✓	✓	✓





## Risk & Operational Resilience

We engage with our risk management framework in relation to supply continuity at both the operational and executive level. Risks are assessed in relation to continuity of supply of physical goods. Control measures are identified as appropriate and may include maintenance of multiple vendors, maintaining site critical spare stocks and hardware support contracts. For example, concerns about grid outages requiring extended generator operations during winter 2022 were mitigated in advance through purchasing additional fuel and ensuring appropriate emergency replenishment contracts were in place.

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### **Risks are assessed in relation to continuity of supply of physical goods**

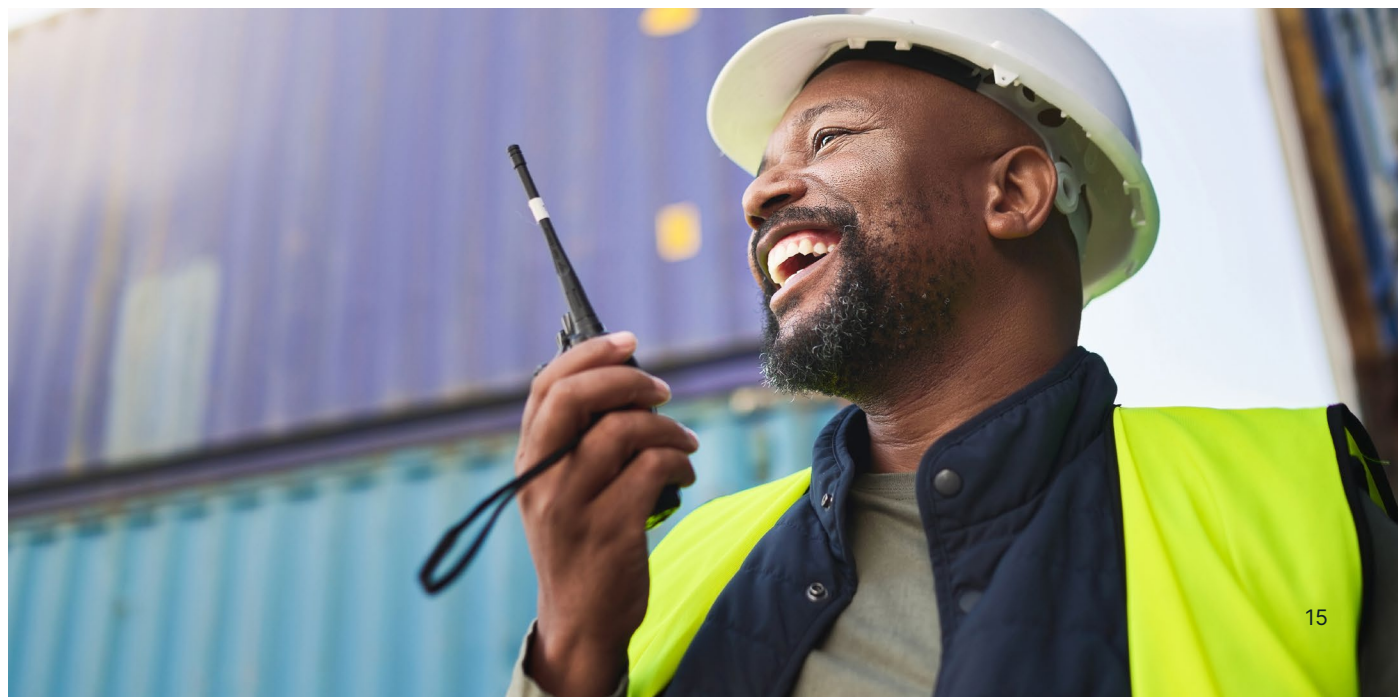
## Supply Chain

Alongside our own technology, solutions and consultancy services, we've formed valuable collaborations with leading industry experts — from hardware and software to networking and security. Our aim is simple: to deliver a secure, compliant, and high performing set of platforms and solutions that are matched to our clients' business requirements. Where a 3rd party partner is used to deliver products and services directly, this will be indicated in the appropriate Service Schedule or service design, as an inherent feature of the service taken, or reflected in the Client Contract.

We recognise that we have a responsibility to engage with our suppliers to support social and environmental benefits, while continuing to ensure we can deliver for our clients.

Pulsant formal supplier management framework involves risk-assessment in relation to sustainability, safety, security, modern slavery and quality elements, both as part of the selection criteria and on an ongoing basis. The review cycle requires supplier managers to establish any performance concerns and take appropriate action to mitigate any resulting risk to our operations.

We maintain and circulate our Supplier Code of Conduct in order to outline our expectations around business ethics and sustainability issues, and where there are areas of concern identified, we primarily seek to collaborate with our supply base in order to encourage improvement.



## Appendix 1: 2022 Environmental Data Table & Methodology

Environmental Data	2019	2022
Electrical power consumption (KWH)	99,617,190*	88,906,263*

\* Includes consumption of sites acquired during reporting period prior to the date of acquisition

	Carbon Emissions (TCO2E)	2019 (Re-calculated baseline)	2022 (Reduction % - Target 50% by 2030)
<b>Scope 1</b>		<b>899</b>	<b>551 (39%)</b>
	Diesel/gas-oil	137	108
	Fugitive emissions of F-gas	608	380
	Natural Gas	154	63
<b>Scope 2</b>	Electricity (location-based)	25,462	17,193 (32%)
	Electricity (market-based)	4,739	2,475
<b>Scope 3</b>		<b>17,336</b>	<b>13,336 (23%)</b>
	Business travel	233	92
	Capital Goods	3,736	2,413
	Employee commuting	452	296
	Fuel- and energy-related activities	6,034	6,097
	Purchased Goods & Services	6,881	4,436
	Waste generated in operations		2
<b>Total</b>		<b>43,698</b>	<b>31,080 (29%)</b>

## Methodology

### Changes to Methodology

There have been no material changes to methodology compared to previous reporting years. However, in particular the data quality around scope 3 spend-based calculations is an area that may be subject to improvement and change.

### Acquisitions

Pulsant have included in these accounts the full-year carbon emissions from the acquisition completed 1st March 2022, in order to best reflect performance against the baseline year, which has been re-calculated to include the acquired site.

### Base Year Selection

Pulsant has selected 2019 as base year for the purposes of target-setting across scopes 1, 2 and 3, in order to avoid the impact of the COVID-19 pandemic in 2020 and 2021.

### Base Year Emissions Recalculation Policy

Pulsant shall recalculate base year emissions in line with the GHG Protocol Corporate Accounting & Reporting Standard in the case of acquisition or divestment resulting in a significant change to the organisational structure, i.e greater than 5% impact on base year footprint. Gross base year emissions shall not be recalculated in case of outsourcing, since a common base year is used for scopes 1, 2 and 3.

### Emissions Factors Used

Where available and in relation to UK operations, UK Government Conversion Factors are used for the relevant year. Supplementary factors used include Defra Table 13 Indirect Emissions from the Supply Chain (as adjusted for inflation), supplier-specific calculated emissions factors.

### Information on renewable electricity

Pulsant uses SSE Green Electricity that is 100% renewable electricity generated by wind and hydro assets in 2022 in the UK. It is fully backed by Renewable Energy Guarantees of Origin (REGOs) and independently verified by EcoAct, an Atos company (CDP Accredited Provider). One site acquired during 2022 continued to be powered through an existing non-renewable tariff, which has ended as of 31st Dec 2022 and the site is now onboarded into Pulsant's primary power agreement. Using the GHG Protocol Corporate Standards' market-based approach the above enables us to report "0" emissions under Scope 2 for all sites powered through our SSE Green Electricity contract.

### Information on electricity consumption of co-location clients

Pulsant includes power consumed by client devices within leased colocation areas within Scope 2 power consumption data. This comprises an estimated 45,854,508kWh, estimated based on the occupation of building area and relative consumption.

### Estimation

This report contains estimations covering 7% of Scope 1 and less than 1% of Scopes 2 and 3 tCO<sub>2</sub>e values. Estimations have been required to account for missing gas and power consumption invoices and were calculated on the basis of average data from similarly invoiced period.

### Data from Suppliers

Pulsant have endeavoured to use supplier-specific data where feasible. Data provided by suppliers data represents 9% of combined footprint in relation to purchased goods and services, and capital goods categories.

### Exclusions

The following Scope 3 categories have excluded from the inventory based on a screening that estimates their impact as less than 5% of total Scope 3 emissions:

- Upstream Transportation & Distribution
- Upstream Leased Assets
- Downstream Transportation & Distribution
- Processing of Sold Products
- Use of Sold Products
- End-of-Life of Sold Products
- Downstream Leased Assets
- Franchises
- Investments

Scope 3 materiality screening has last been completed in 2021 and will be reviewed on a 2-yearly basis.



## Verification Opinion Statement

### Verification process

Auditel is a management consultancy that is suitably qualified in carbon emissions measurement and verification.

Auditel has been engaged by Pulsant Ltd to conduct a verification of direct and indirect anthropogenic greenhouse gas (GHG) emissions as provided by Pulsant Ltd, BlueSquare House, Priors Way, Maidenhead SL6 2HP in their GHG / CO<sub>2</sub>e Assertion - Corporate Governance & Sustainability Report 2022 Appendix 1: 2022 Environmental Data Table and Methodology

The management of Pulsant Ltd is responsible for the organisation's GHG information system, the development, maintenance and accuracy of such records and all reporting procedures related to that system. For the avoidance of doubt, this includes the measurement of GHG emissions and the calculation of any CO<sub>2</sub>e thereon.

Auditel have undertaken to express an independent verification opinion on Pulsant Ltd's GHG / CO<sub>2</sub>e Assertion for the period 1/1/2022 – 31/12/2022 based on the requirements set out in ISO 14064-3.

This assessment takes the form of a desk review of the above GHG / CO<sub>2</sub>e Assertion along with supporting data for the period 1/1/2022 – 31/12/2022 and is based on the Pulsant Carbon Reporting Standard, Pulsant Scope 3 Emissions Initial Screening Methodology and supporting data.

### Level of Assurance

The level of assurance agreed for this assignment is a limited level of assurance.

### Scope

Auditel's engagement covers verification of GHG emissions included within the organisation's defined boundary (see below) and meets the requirements of WRI/WBCSD GHG Protocol and its amendments.

- The organisational boundary was defined by following the operational control approach.

### Objective

The purposes of this verification exercise are to give a third-party opinion on, within the bounds of the agreed materiality threshold and level of assurance:

- Whether the CO<sub>2</sub>e emissions defined in Pulsant Ltd's GHG / CO<sub>2</sub>e Assertion are accurate;
- Whether the data upon which that Assertion is based is transparent, accurate, complete, consistent and reliable.

### Materiality

The materiality required of the verification was considered by Auditel to be below 5%, based on our understanding of Pulsant Ltd's intended use of their GHG / CO<sub>2</sub>e Assertion.

## Verification Opinion Statement

### Conclusion

The GHG / CO<sub>2</sub>e Assertion provided by Pulsant Ltd has been based on the requirements of WRI/WBCSD GHG Protocol and its amendments and data related to the period 1/1/2022 – 31/12/2022 disclosing gross emissions of 31,080 tCO<sub>2</sub>e (metric tonnes of CO<sub>2</sub> equivalent) are verified by Auditel to a limited level of assurance, consistent with the agreed verification scope, objectives and criteria:

- Scope 1 Emissions 551 tCO<sub>2</sub>e
- Scope 2 Emissions (location-based) 17,193 tCO<sub>2</sub>e
- Scope 3 Emissions 13,336 tCO<sub>2</sub>e

Auditel adopted a risk-based sample assessment of the supplied data, along with any calculations based thereon.

The following Reporting Principles have been met - Completeness, Consistency, Accuracy, Transparency, Relevance. Materiality level applied for verification is 5%.

Auditel concludes with limited assurance that no evidence has been found that the presented GHG/ CO<sub>2</sub>e Assertion:

- is not materially correct;
- is not a fair representation of the supplied GHG emissions data and information;
- is not prepared in accordance with the criteria listed above.

We planned and performed our work to obtain the information, explanations and evidence that we considered necessary to provide a limited level of assurance that the CO<sub>2</sub>e emissions for the period 1/1/2022 –31/12/2022 are fairly stated.

This statement shall be interpreted with the GHG/CO<sub>2</sub>e Assertion - Corporate Governance & Sustainability Report 0 Appendix 1: 2022 Environmental Data Table and Methodology, of Pulsant Ltd.

DocuSigned by:  
*Brad Petzer*  
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**Brad Petzer**  
Chief Financial Officer

DocuSigned by:  
*Mark Miller*  
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**Mark Miller**  
Lead Verifier



**Note:** This Statement is issued on behalf of Pulsant Ltd, by Auditel (Beneve Ltd) Mintlyn Cottage, Mintlyn Farm, Queen Elizabeth Way, Kings Lynn PE32 1EZ based upon an audit performed by Auditel. To our knowledge, no member of the verification team has a business relationship with Pulsant Ltd beyond the requirements of this statement. Requests for a full copy of this statement and related GHG Assertion is available on request from Pulsant Ltd, BlueSquare House, Priors Way, Maidenhead SL6 2HP. This Statement does not relieve Pulsant Ltd from compliance with any bylaws, federal, national or regional acts and/or directives/regulations or with any guidelines issued pursuant to such regulations. Stipulations to the contrary are not binding on Auditel and Auditel shall have no responsibility to parties other than Pulsant Ltd.

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