



Modern Slavery Act Statement for Pulsant Limited

For Financial Year Ending 31st December 2023

This statement has been reviewed and approved by the Board of Directors of Pulsant Limited on 27 February 2024.

Our structure, business and supply chain

This statement is in relation to Pulsant Limited as our sole trading entity. We provide colocation, network and infrastructure services to mid and large-sized organisations across the UK. We own and operate twelve regional enterprise-class data centres across the UK from which we deliver colocation, connectivity and cloud services to our clients. We may also provide services to our clients from third party data centres.

Our supply chain primarily consists of the procurement of power, facilities services, software licencing, other services and IT equipment and peripherals.

Our policies

We have a zero-tolerance approach to modern slavery and human trafficking and are fully committed to acting ethically and with integrity in all business relationships. We recognise our responsibility as a business to promote just and equitable treatment of people that work for us, both directly and within our supply chain and ensure that there is no modern slavery either in our own operations or through our supply chain.

We have policies in place to safeguard the working environment for our people, including a staff handbook and grievance and disciplinary policies.

To protect people working in our supply chain, we set out our expectations in our Corporate and Social Responsibility policy and our Supplier Code of Conduct.

Our risk profile

We have re-assessed our risk of engaging with Modern Slavery and Exploitation and identify four key areas of focus:

- **Temporary labour** – whilst the majority of our temporary roles are of a high skill level, we will occasionally engage lower skilled temporary labour to support our facilities management, where there is a higher risk of exploitative employment practices.
- **Construction, Security & Cleaning Services** – these are higher risk sectors that we engage with directly in relation to the operation of our UK facilities.
- **Technology products (hardware, peripherals and consumables)** – whilst 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.
- **Apparel** – whilst this is a very small area of spend for us, apparel manufacturing is a high-risk sector for Modern Slavery.

Given the control and policies we have in place to safeguard the working conditions of our own people, we no longer consider this to be a risk area.



Due diligence and redress

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's 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.

Training

For the last two years, the focus of our Modern Slavery awareness and prevention training has been on three teams; those engaged in the management of our facilities who select and manage the service suppliers which we have identified as working in higher slavery risk industries, our procurement team and our assurance team, who check the effectiveness of our controls.

For the year ahead, we will also train our People team members working in procurement to ensure they can spot signs of modern slavery in temporary employees.

Goals and KPIs

We are pleased to have achieved our commitments in 2023:

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

In 2024 we aim to deliver against the following goals:

- Completion of Modern Slavery Awareness and Prevention Training for all members of the Procurement, Assurance, Data Centre Management and People teams
- Assessment of approaches to modern slavery of 100% of suppliers in high-risk service categories (construction, security, cleaning services)
- Assessment of approaches to modern slavery for all lower tier suppliers in high-risk manufacturing categories (apparel and technology hardware and peripherals supply)

Signed:

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Brad Petzer
 Chief Financial Officer

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