

Supply Chain Code of Conduct

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Policy Statement

Pulsant is committed to operating in a responsible and sustainable manner, as well as in compliance with applicable laws and regulations. While we run our business in line with the expectations of diverse stakeholders, we also see corporate and social responsibility as a discipline that helps us manage risks and maximise opportunities.

Pulsant expects all suppliers to adhere to the following code of conduct and to engage their own supply chain to embed standards of ethical business practices. Pulsant invites suppliers to disclose any aspect of this code of conduct which they feel is not fully complied with, and reserves the right to audit suppliers against their adherence to this code of conduct.

Where non-compliance is reported or identified, Pulsant will engage with the supplier to implement remediation plans where appropriate. Regulatory breach, or failure to engage with Pulsant in remediation may result in immediate suspension of the supplier relationship.

For any further queries please contact Pulsant's Assurance team: business.assurance@pulsant.com.

Health & Safety

Suppliers shall demonstrate commitment to protecting the health and safety of all individuals affected by their activities. They should actively promote responsible practices and attitudes and implement continuous improvement.

Where relevant to their activities, the supplier is should seek external assurance of their management of health & safety.

Any supplier personnel attending a Pulsant location, shall have received appropriate training to carry out their duties in a safe manner with full consideration of risk to themselves and others.

Any personnel carrying out works on a Pulsant site within confined spaces, areas subject to gaseous fire suppression, excavations, or undertaking hot works, work at height, on electrical system or in the vicinity of asbestos shall only do so based on a permit-to-work authorised by Pulsant.

Environment & Sustainability

Suppliers shall demonstrate commitment to environmental protection and stewardship. This should include clear action to pursue energy efficiency, manage and mitigate the impact of harmful substances, re-use and recycle waste materials where possible and minimise landfill waste from business operations.

Suppliers shall:

- Keep informed of environmental issues which apply to their business and maintain their people's awareness of their environmental impacts and responsibilities.
- Manage and develop operations in an environmentally sensitive manner.
- Minimise their waste to landfill by reducing our waste generation and by segregating and recycling waste wherever economically and operationally feasible.
- Prevent pollution by active risk management of any hazardous substances used

- Co-ordinate business transport to reduce fossil fuel consumption.
- Ensure that the environment is considered in the procurement of goods and services and set appropriate goals to achieve sustainability across their value chain.
- Continuously improve the effectiveness of the environmental management within their organisation.
- Meet all necessary legislative, regulatory and consent requirements which relate to their business.
- Assist Pulsant on their continuous improvement endeavours (with mutual agreement) to further develop their processes and procedures by means of direction, innovation and best in class recommendations.

Business Ethics & Transparency

Suppliers shall demonstrate commitment to maintaining the highest standards of integrity and corporate governance. Suppliers shall conduct their business in an open, honest, and ethical manner always and take a zero-tolerance approach to bribery and corruption. Suppliers shall not offer any gifts or entertainment to Pulsant employees which may be interpreted as a bribe or kickback.

Pulsant does not make, and will, not accept, facilitation payment or “kickbacks” of any kind.

“Facilitation payments”, also known as “back-handers” or “grease payments”, are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by government official). They are not common in the UK but are common in some other jurisdictions in which the Company may operate.

“Kickbacks” are typical payments made in return for a business favour or advantage (To improve a supplier’s bidding position in a Tender process or to secure a contract offer from a supplier).

Suppliers must not engage in any such activity with Pulsant employees and Pulsant employees must not engage in any activity that may lead to a facilitation payment or kickback being made or accepted by the Company or on the Company’s behalf, or that may suggest that such a payment will be made or accepted.

All business awards will be fair, aligned to competition laws, and the decision will be made based on best overall value and managed risk for Pulsant activity.

Pulsant maintains an Anti-Bribery and Corruption Policy, through which we outline our commitment to acting professionally, fairly and with integrity in all of its business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption. Any known or suspected bribe in the course of doing business with Pulsant shall be reported to Pulsant’s Assurance team, through business.assurance@pulsant.com.

Entertainment and Gifts

Although it is customary in many companies to entertain customers and to exchange gifts, such entertainment and gift exchanges can be interpreted as a conflict of interest. Gifts may need to be reported or returned pursuant to the code of conduct applicable to Pulsant employees. Approval is required from a Company Director for gifts over £50 and hospitality of a value greater than £250 per individual. Please check with the Pulsant employee before submitting any gifts or incentives.

The giving & accepting of gifts and business entertainment is permitted if the following requirements are met:

- It is given in the Company's name, not the individual's name;
- It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- It is appropriate in the circumstances, taking account the reason for the gift, its timing and value. For example, in the UK it is customary for small gifts to be given at Christmas;
- It is openly, not secretly; and
- It complies with any applicable local law.

Pulsant will only approve business entertainment proposals that demonstrate a clear business objective and that are appropriate for the nature of the business relationship. Pulsant will not approve business entertainment where it considers that a conflict of interest may arise or where it could be perceived that under influence, or a particular business benefit is being sought (for example, prior or during a tender exercise).

Reimbursing a third party's expense or accepting an offer to reimburse Company expense (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) is not acceptable without this being agreed in advance by a Company Director.

Pulsant appreciates that practise varies between countries and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all circumstances the gift, hospitality or payment is reasonable or justifiable. The intention behind it should always be considered, further guidance can be obtained from the CFO. Please check on policy applicable to you.

Record Keeping

The company must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

All gifts and the hospitality of a value greater than "£250 must be notified to the CFO and be recorded in the benefits register which will be maintained by the Finance Director. This register will be subject to management review. Please do not send in gifts or deliver hospitality greater than this value without prior consent.

All accounts, invoices, and other records relating to dealing with third parties including suppliers should be prepared and maintained with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Whistleblowing Policy

As part of our commitment to being an ethical and open company; whilst we very much promote internal and informal lines of communication in the first instance, as well as having a formal whistleblowing and grievance policy in place we are committed to enhancing this open and transparent communication further and are now introducing a confidential whistleblowing hotline.

The whistleblowing hotline service allows our people, their direct families, third-party suppliers and clients, in fact any interested party to report concerns about any suspected malpractice or unlawful or unethical conduct within Pulsant.

Whistleblowing legislation protects anyone who reports a concern who has the reasonable belief that:

- a criminal offence.
- a miscarriage of justice.
- an act creating risk to health and safety.
- an act causing damage to the environment.
- a breach of any other legal obligation; or
- concealment of any of the above.

is being, has been, or is likely to be committed.

The whistleblowing hotline service is run by a third party provider and is totally confidential. Concerns may be reported using an online portal or a 24/7/365 telephone line.

Using either the portal or phone, anyone reporting a concern can choose to remain anonymous. Using the online portal, a two way dialogue between the reporter and Pulsant can take place, where further information may be requested and responses to a concern may be provided.

Web <https://pulsant.integrityline.com/>

Confidential Phone; 0333 2423759

Further details on the policy and associated process can be found on our internal [Whistleblowing Policy](#)

Information Security & Continuity

Any information, personal or otherwise, provided to the supplier by Pulsant in the course of doing business must be treated as confidential unless marked otherwise, and appropriate technical and organisational controls shall be applied.

Where handling information provided by Pulsant is central to the services provided, suppliers should obtain external assurance of their management of information security. Pulsant may also request further specific evidence of information security management policies and practices, in order to evaluate whether information security risk is appropriately controlled.

Suppliers shall maintain and test business continuity arrangements in order to meet service commitments.

Human Rights & Modern Slavery

Forced or involuntary labour

Workers shall not be subject to any form of forced, compulsory, bonded, indentured or prison labour. All work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, given notice of reasonable length.

Young Workers

Child labour is not to be used in any stage within Pulsant's supply chain. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. Suppliers shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labour is identified, assistance/remediation is provided.

Recruitment fees

Workers shall not be charged any fees or costs for recruitment, directly or indirectly, in whole or in part, including costs associated with travel, processing official documents and work visas in both home and host countries.

Contracts of employment

Written contracts of employment shall be provided to migrant workers in a language they understand, clearly indicating their rights and responsibilities with regard to wages, working hours and other working and employment conditions. Migrant workers shall be provided with their employment contract prior to deployment. The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

Document Retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation (e.g. passports), is strictly prohibited. The retention of personal documents shall not be used as a means to bind workers to employment or to restrict their freedom of movement.

Deposits

Migrant workers shall not be required to lodge deposits or security payments at any time.

Humane Treatment

The workplace shall be free of any form of harsh or inhumane treatment. Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour. The

use or threat of physical or sexual violence, harassment and intimidation against a worker, his or her family, or close associates, is strictly prohibited.

Workplace Equality

All workers, irrespective of their nationality or legal status, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work (including but not limited to wages, benefits, and accommodations) no less favourable than those available to country nationals. Migrant workers (or their family members) shall not be threatened with denunciation to authorities to coerce them into taking up or maintaining employment.

Wages and benefits

All workers shall be paid at least the minimum wage required by applicable laws, and shall be provided all legally mandated benefits. Wage payments shall be made at regular intervals and directly to workers, in accordance with national law, and shall not be delayed, deferred, or withheld. Only deductions, advances, and loans authorized by national law are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers. Clear and transparent information shall be provided to workers about hours worked, rates of pay, and the calculation of legal deductions. All workers must retain full and complete control over their earnings. Wage deductions must not be used as a disciplinary measure, or to keep workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work in order to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

Working hours

Workers shall not be forced to work more than the number of hours permitted in national law. Where the law is silent, normal working hours shall not exceed eight per day and forty-eight per week, and total working hours including overtime shall not exceed sixty. All overtime shall be purely voluntary, unless part of a legally recognized collective bargaining agreement. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

Freedom of movement and personal freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer- or recruiter-operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom. Mandatory residence in employer-operated facilities shall not be made a condition of employment.

Grievance procedure

An effective grievance procedure shall be established to ensure that any migrant worker, acting individually or with other workers, can submit a grievance without suffering any prejudice or retaliation of any kind.

Private employment agencies and labour recruiters

Companies should hire migrant workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, companies shall ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

Supplier's Responsibilities

Suppliers must ensure that they read, understand, and comply with this policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for your business or under your business's control. Suppliers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Suppliers must contact the appropriate Pulsant contact or contact our Head of Procurement or CFO if they believe or suspect that a conflict of interest has occurred or may occur in the future. For example, if a Pulsant employee has received something to gain business advantage with the company he is conducting a tender review with or indicated to the supplier that a gift or payment is required in return to secure and win business.

Monitoring & Review

The company will periodically review the implementation of this policy in respect to its suitability, adequacy and effectiveness and is committed to making improvements where appropriate. Internal control systems and procedures will be subject regular audits to provide assurance that they are effective in countering bribery & corruption. The CFO will report the results of this review process to our Board of Directors.

All suppliers who are obliged to comply with his policy will be notified of any changes periodically.

Supplier's acceptance of this policy

The supplier agrees to fully adhere to the detail and content provided above and report any wrongdoing to Pulsant Head of Procurement or CFO in a live time basis with supporting factual evidence supporting the claim made.

Pulsant agreed to fully support any investigation of any claim in a professional and timely manner.

Supplier Name	Enter SUPPLIER NAME here

Contact Name:	Enter Individual's NAME here
Position:	Enter POSITION here
Date:	Enter DATE here