



Modern Slavery Act Statement for Pulsant Limited

For Financial Year Ending 31st December 2025

This statement has been reviewed and approved by the Board of Directors of Pulsant Limited on 24th February 2026.

Our structure, business and supply chain

This statement is in relation to Pulsant Limited as our sole trading entity. The oversight and management of the Modern Slavery risk in our business sits with the CFO, who sits on and reports to the Board.

We provide colocation, network and infrastructure services to mid and large-sized organisations across and exclusively in the UK. We own and operate fourteen regional enterprise-class data centres across the UK from and at which we deliver colocation, connectivity and cloud services to around 1,500 clients. During 2025, we added two further data centre sites. We may also provide services to our clients from third party data centres.

The main areas of spend in our supply chain are:

- Electricity – procured for our UK operations from UK utilities providers
- Facilities services e.g. equipment maintenance and installation– delivered at our sites in the UK by UK-based providers
- Software licencing – procured from mainly US-based providers
- IT equipment and peripherals – procured either through UK-based distributors or directly from the equipment manufacturers
- Other services – these comprise a variety of different services, the majority are delivered by local suppliers in the UK
- Mechanical and Electrical equipment and parts – procured through the UK-subsiidiaries of either distributors or directly from the equipment manufacturers.

In order to understand the layers of our supply chain beyond our first tier suppliers, we have engaged with our tier one suppliers directly or consulted publicly available due diligence materials available from NGOs such as "KnowTheChain".

Our supply chain analysis in 2025 has primarily focussed on tier 1 suppliers. In 2026, we plan to more formally map our supply chain beyond tier 1.

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 to 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 the Pulsant People Handbook and Grievance and Disciplinary policies. These are available to everybody working at Pulsant on our intranet.

To protect people working in our supply chain, we set out our expectations in our Business Ethics Policy and our Supplier Code of Conduct, which all new suppliers are required to sign. These include prohibiting forced labour, child labour, recruitment fees for workers, compulsory overtime and confiscation of worker's documents alongside insisting on fair wages, freedom of movement, workplace equality, humane treatment and established grievance procedures.



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 in the UK, 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.
- **IT 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 at higher-risk of modern slavery, in particular in the tier 2 and 3 supply chain located in China and Taiwan (based on KnowTheChain analysis).
- **Apparel** – whilst this is a very small area of spend for us, apparel manufacturing is a high-risk sector for Modern Slavery, in particular in the tier 2 and 3 supply chain in Bangladesh (based on KnowTheChain analysis).

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 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

We have focussed our mandatory Modern Slavery awareness and prevention training on four 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 who screen and review suppliers, members of our People Team, who manage the recruitment of permanent team members, contractors and temporary team members and our Assurance Team, who check the effectiveness of our controls.

We deliver the training through our companywide e-learning platform and are delighted to see that several team members outside of the targeted departments have also chosen to voluntarily take the training.



Goals and KPIs

We are pleased to have achieved our commitments in 2025:

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

In 2026 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, Marketing and People recruitment 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 IT hardware and peripherals supply)

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Brad Petzer
Chief Financial Officer