

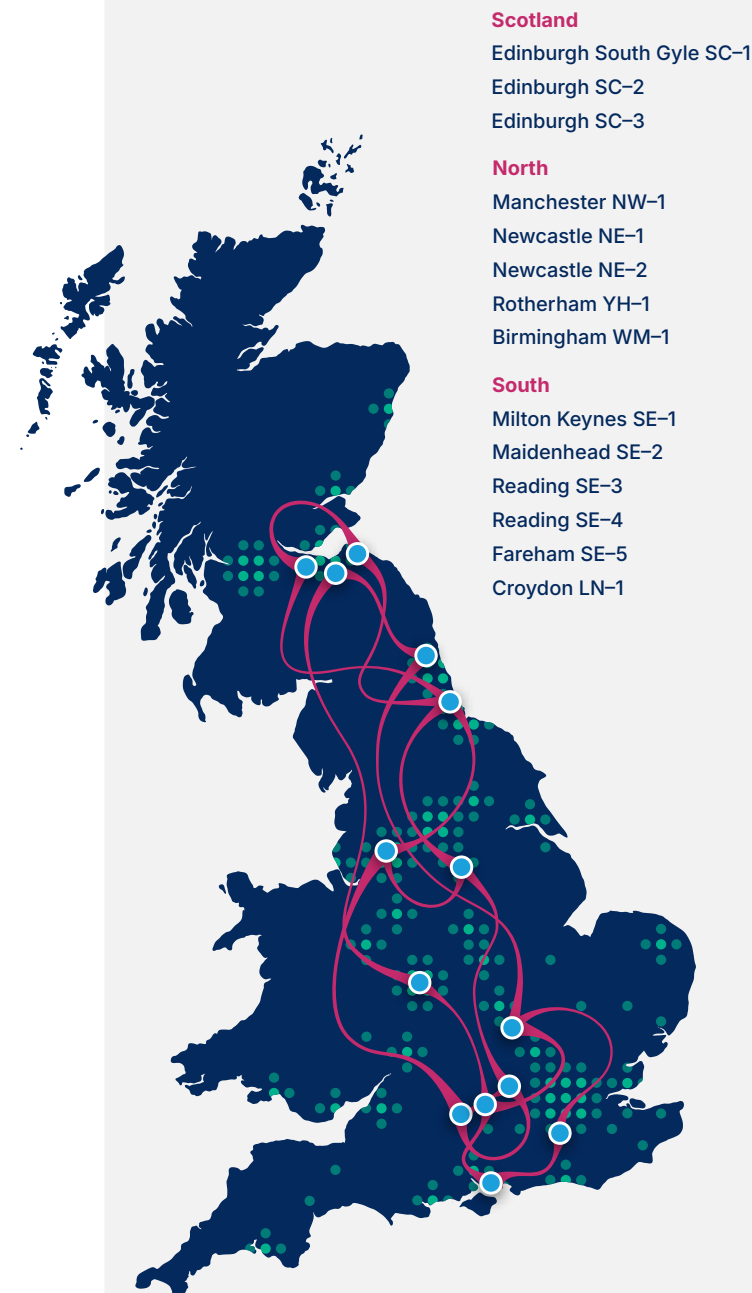
2024



Environmental, social and governance report

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Statement from our CEO

As a UK-owned and operated edge infrastructure provider with a truly regional presence, Pulsant recognises the significant impact we have—not only on the environment but on the people, communities, and businesses we serve across the country. The data centre industry is increasingly under the spotlight as our reliance on technologies like AI grows—bringing with it significant implications. At the same time, macroeconomic pressures and the growing urgency of the climate crisis continue to shape the landscape in which we operate.

Balancing performance, sustainability, and the wellbeing of our people is a responsibility we take seriously. Over the past year, we've continued to invest significantly in our estate to ensure that Pulsant delivers not just the most geographically diverse data centre footprint in the UK—but one that is also sustainable and efficient. Our proactive infrastructure replacement programme has helped us reduce electricity usage, and we remain committed to transparency, encouraging clients to be more conscious of how digital services impact the planet. This reflects our core value of 'Own It'—taking responsibility for driving meaningful change.

Beyond our own operations, we are actively supporting the wider supply chain on the journey to net zero. In 2024, we brought together a group of our SME suppliers for in-person decarbonisation workshops. These sessions empowered participants—from infrastructure and maintenance firms to consultancies and distributors—to better

understand their carbon footprints and develop action plans to reduce them. All have committed to implementing those plans, creating positive momentum across our ecosystem.

People remain at the heart of our success. Our aim is to ensure Pulsant is a welcoming and nurturing environment where our people feel valued, supported and able to thrive. From expanding our wellbeing initiatives and mental health support to launching new training programmes and early careers opportunities, we're committed to helping our teams grow and thrive. A highlight this year was the opening of our new Maidenhead office—an attractive, modern workspace designed to foster collaboration, flexibility, and wellbeing.

We also continued to strengthen our community engagement through volunteering, fundraising, and local impact programmes, and enhanced our focus on workplace safety through ongoing training and improved governance structures.

With new regulatory changes, including the classification of data centres as Critical National Infrastructure and those outlined in the forthcoming Cyber Security & Resilience Bill, it's never been more important for data centre providers to operate with integrity, resilience, and compliance. I'm confident in the frameworks we have in place and optimistic about the opportunities these changes will bring—for our clients, our people, and the communities we proudly support.



Rob Coupland
Chief Executive Officer

Pulsant recognises the significant impact we have—not only on the environment but on the people, communities, and businesses we serve across the country

Working towards a sustainable planet

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:

- Pulsant commits to achieve Net Zero by 2050 at the very latest in accordance with the Science Based Targets initiative's Net Zero Standard, which means:
 - reducing our carbon emissions across all scopes by 50% by 2030 on an absolute basis from a 2019 baseline,
 - then continue to drive reductions across all scopes to achieve at least 90% reduction by 2050 and balance any remainder through supporting carbon removals.
- Offset 100% of our scope 1 greenhouse gas emissions through certified, 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 PUE target of 1.3 by 2030.
- Fully and transparently manage the lifecycle impact of each product and service by 2025.

Chain:

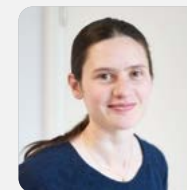
- Make resource efficiency, disposal and carbon impact key considerations in procurement, and be an active participant in the circular economy.

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.



Helen Munro
Head of Environment & Sustainability



As a society, we are finding hope in the transformative abilities of information to solve problems and replace resource-intensive systems. Yet the impacts of granular digital choices are not well understood, and as they condense in data centres, the consolidated impact of these choices emerge. As a challenge of shared responsibilities, there are thousands of parties contributing to the resource effectiveness through Pulsant's business.

Our services are immensely powerful, but we must integrate a sense of respect for the resources on which we depend. Looking internally, Pulsant is progressively eliminating energy waste through improving PUE, but this is only a part of the picture. Resource consumption must not be obscured by service providers, to enable the entire system to foster innovation and be the best it can be.

Not only should we be prepared to talk in numbers; we should also be able to bring the numbers to life by understanding and explaining their dynamics. The last part is being able to support a vision of what digital infrastructure can be in the future. In 2025, we also have a commitment to greater transparency over our services.



Our impact and approach

2024 results show progress towards decarbonisation and efficiency goals, in the context of a stronger focus on our core value as a business and having matured our understanding of how we consume finite resources.

In delivering our services in 2024, we:

- were responsible for emissions of 31,360 tCO₂e, a 31% reduction since 2019
- saved over 1,139MWh of electricity through our data centre efficiency program, equivalent to turning off about 130 domestic ovens
- delivered an SME decarbonisation engagement cohort with a number of our key suppliers
- retained our EcoVadis Silver rating with an improved score, as well as CDP disclosure 'B' rating, and ISO14001 and ISO50001 certifications

Looking towards 2025 we target saving an additional 2,000 MWh through efficiencies including power system upgrades, airflow and containment strategies, and cooling investments.



Greenhouse gas emissions since baseline 2019 against 2030 target trajectory

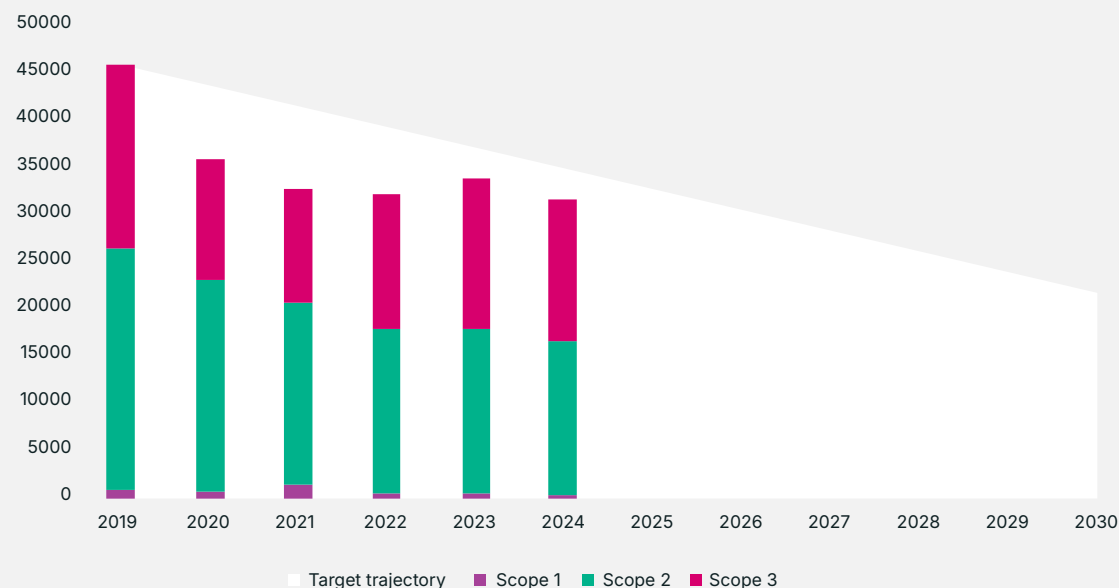


Figure 1. Greenhouse Gas emissions since baseline 2019 against 2030 target trajectory, with electricity reported using the location-based method based on UK average emissions intensity.

Events since end of 2024:

Eliminating HFC-227ea – In early 2025, an amount of HFC-227ea (FM200) gas in our fire suppression system was inadvertently released during routine testing by our certified contractor. HFC-227ea is an effective fire suppressant and widely used but has a very significant global warming potential. Pulsant are actively phasing out HFC-227ea from our systems by 2030 and will be escalating the progress towards this goal.

Acquisition of WM-1 Birmingham and SE-5 Fareham data centres was completed in Q2 2025; adding around 35% to our data centre capacity. According to principles of the GHG Accounting and Reporting Protocol 2015, we intend to re-calculate the baselines for emissions and efficiency targets in our next ESG report and update our decarbonisation strategy accordingly.



2024 emissions by source and category

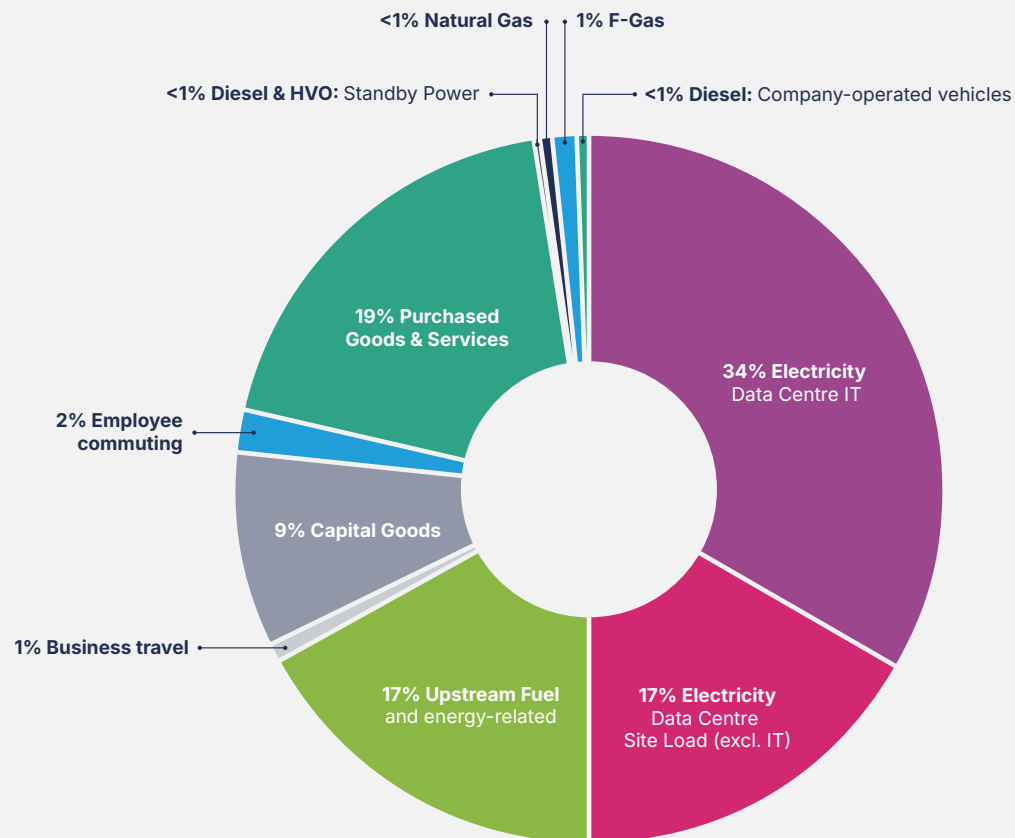


Figure 2. 2024 emissions by source and category.
Refer to [Appendix 1](#) for full data and methodology notes.

In our data centres

Across our estate, we have data centre managers and mechanical, electrical and IT services teams, supported by regional and central experts in infrastructure and operational excellence. They have a critical role in looking after our data centres. Their experience, engagement and diligence is immensely powerful in delivering the maximum value for our clients while operating as efficiently and effectively as possible.

Our sites are well-established, and we have an ongoing programme to manage lifecycle replacements of infrastructure. We also have proactive infrastructure replacements planned where there is a clear energy efficiency improvement.



Alan Mitchell
Data Centre Manager (North East)



We are always exploring new ways to improve how we deliver power and cooling for our data halls. Efficiency is at the heart of every infrastructure decision, and meeting our targets takes collaborative effort across the business.



By the end of 2024, the estate aggregated PUE reached 1.501; improved from 1.523 in 2023. The clearest efficiency improvements came from updated power infrastructure at Edinburgh SC-1 and Newcastle NE-2 sites installed late 2023, various works at Manchester NW-1 and cooling upgrades at Maidenhead SE-2. Site teams across locations also progressed our airflow management with further segregation of hot and cold aisles and temperature optimisation.

We acknowledge growing water scarcity within the UK, particularly South-East England. While most of our sites' cooling systems do not consume water, evaporative water systems support avoidance of electrical power consumption and deliver low PUEs.

As part of our business, infrastructure and network services, we work with vendors and asset recovery services to ensure decommissioned hardware re-enters the supply chain where possible and otherwise is recycled responsibly.

Estate-Average Power Usage Effectiveness (PUE) v 2030 Target Trajectory

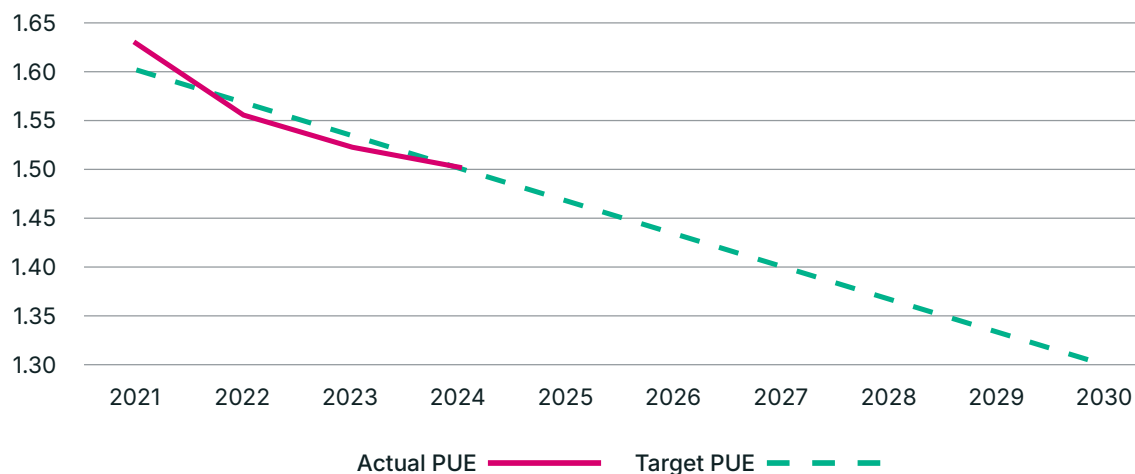


Figure 3. Data Centre Estate Power Usage Effectiveness (PUE)

Renewable power

Buying renewable energy is an expectation for many of our clients; and we have for many years supported our energy procurement through renewable energy guarantees of origin (REGOs) that link our consumption volumes to units of renewable generation on an annual basis. However, there are power procurement options that have a clearer environmental benefit.

We have for many years supported our energy procurement through renewable energy guarantees of origin (REGOs)

The energy market is changing as we see increasingly volatile availability of renewable power on an hourly basis and in accordance with the transmission capabilities of local electricity grids. Renewable power generation directly connected to a data centre is highly attractive, although physical constraints limit the scale of these types of opportunities.

Directly supporting additional renewable capacity feeding the power grid through long-term contracts is also an option with strong benefit; these approaches are under exploration.



Everyone's enthusiasm has been infectious and helped to drive that acceleration of planning and implementation with ideas we wouldn't have otherwise considered.



2024 SME decarbonisation cohort participant feedback

Value chain engagement

Our supplier and vendor engagement programme is designed to deliver meaningful change in addressing environmental impacts. While we continually evaluate and engage with many vendors with a mature level of sustainability governance, there are smaller businesses within our supply chain without a clear strategy to understand and address greenhouse gas emissions. In 2024, we tackled this through facilitating a supplier cohort through a series of workshops aimed to educate and empower smaller organisations to create an appropriate environmental action plan and collaborate more effectively to accelerate progress.



Climate-related risks and opportunities

We have screened climate-related physical and transition risks based on near and long-term projections, including RCP8.5 where data is available. Physical considerations include:

- Extreme heat days
- Subsidence
- Wildfire
- Extreme rainfall
- Drought & water stress
- Coastal erosion/sea level rise
- Humidity changes
- Second-order physical risks such as critical supply failures

Our response to physical risks includes requiring higher ambient temperature ratings for new cooling infrastructure, making improvements to site

infrastructure drainage management and building fabric monitoring, as well as ensuring climate-related risk is fully considered as part of strategic development and acquisition.

We also assess the potential for transitional risks and opportunities to arise from climate-related changes in:

- Regulation & taxes
- Electricity infrastructure and pricing models
- Operational cost changes
- Reputation & performance expectations
- Environmental legal disputes/violations

Any identified risks are subject to oversight at operational and executive-level risk committees.



Our 'Sort-it September' engagement month was created to reintegrate a sense of respect for material resources, involving broadening our peoples' awareness of risks and opportunities around our consumption habits.

We recycled 1670 drinks cans in our offices during September, raising £501 from Macmillan Cancer Support, and participated in the Marine Conservation Society's Great British Beach Clean, collecting 654 items from beaches in Newcastle and Edinburgh.



Resource-Intensity of our services – A Guide for Our Clients

In 2025 we are working on stepping up our transparency to provide clients with service-specific insights, based on our observations, to enable a realistic understanding of resource-intensities and scale of environmental impacts;



Colocation in our Data Centres

Every kilowatt used by client hardware relates to **on average 4.42 tCO2e emissions per year**, similar to driving from Edinburgh to Cape Town – and back again.

Per kW of IT energy:

Electricity:	13,149kWh / 3.62 tCO2e (location-based including upstream and data centre energy)
Infrastructure:	0.3 tCO2e
Operational services:	0.51 tCO2e

Clients are responsible for IT energy use and impacts, determined by

- Hardware selection
- Systems design, including virtualisation
- Choice of locations considering regional emissions profiles*
- Adhering to installation standards

Pulsant manages

- Reducing facility energy (PUE)
- Renewable power purchasing strategy
- Responsible future planning & infrastructure investment choices



Infrastructure-as-a-Service

Virtualised infrastructure is designed to be significantly more resource-effective than dedicated physical hardware.

As an example, a recent measure of Pulsant Cloud indicated:

Per allocated vCPU with average 4.5GB RAM:	8.6 W
Per TB SSD Storage:	7.4W
Per TB HDD Storage:	10.7W

We aim to develop our understanding of these energy characteristics further, enabling a fuller explanation.

Clients can further:

- Optimise resource requirements, in particular RAM allocations and usage profile
- Locate on greener energy grids*

Pulsant manages:

- Optimal hardware utilisation
- Data centre (see colocation)
- Hardware longevity and lifecycle management



Network Fabric

Our next generation Edge network delivers secure connectivity across our footprint. It uses hardware in our data centres as well as physical fibre links provided by Zayo. During 2025 we are decommissioning legacy devices to cut our core networking energy by an estimated 40%.

Clients:

- Optimise bandwidth allocation to match usage needs
- Embrace virtual connections via the Edge Fabric to increase energy and hardware efficiencies

Pulsant will:

- Use of energy efficient hardware, with lifecycle upgrades to maintain efficiency
- Optimising network traffic, improving virtual connections and transmission without the need for increased hardware
- Engage with connectivity providers to encourage sustainable relationships and utilisation

* www.carbonintensity.org.uk/#regional illustrates regional variety in grid dependence on non-renewable energy sources as currently determined by the local of renewables and national grid transmission restrictions. Global energy data is available from app.electricitymaps.com/map/12mo/monthly.

Supporting our people and communities



April Clark
Chief People Officer



At the heart of our ESG strategy is a firm belief that our people are our greatest strength. The 'Social' element reflects our commitment to creating an inclusive, supportive, and engaging environment, where every individual feels valued, respected, and empowered to be their authentic selves.

By fostering and trying to enhance levels of engagement, wellbeing, and belonging, we not only strengthen our culture but also drive sustainable success. We are focused on ensuring that every voice is heard, every contribution is recognised, and every individual has the opportunity to thrive. Our values are at the heart of our success, and by consistently bringing them to life every day, we will achieve even greater success.



Health and wellbeing

We recognise the integral role that health and wellbeing play in helping our people thrive. In our People First culture, we champion the benefits of an environment where our people can be themselves, and can prioritise their physical, mental, emotional, and social health, with access to a range of benefits to support them.

Our Wellbeing Programme continues to be highly rated by our people and provides a growing range of resources and workshops, covering mental, physical, and financial wellbeing.

In 2024, we launched a new Champion Health platform, which included an anonymous health diagnostic. This data, alongside input from our Health Champions, enables us to tailor our wellbeing programme to the specific needs of our people, ensuring we offer relevant and timely support.

Our data told us our people wanted to prioritise their physical and mental health, so we introduced a team-based Pacer Step Challenge, which focused on everyone improving their daily steps to help their team walk the wild Atlantic Way. We encouraged walk and talk meetings, and regular lunchtime strolls to help us meet the target.

We continued to invest in our Mental Health First Aiders programme, recruiting and developing more qualified First Aiders. These individuals are trained to recognise, actively engage, and support our people facing mental health challenges and work alongside our People Leaders, who also received training on helping them recognise signs and support their teams. We encouraged our people to make time for the webinars we offered on core mental health topics and with guest speakers, such as Andy's Man Club.

Beyond our targeted efforts, the Champion Health platform also provides our people with the option to choose the wellbeing resources that are best suited for them, from an array of resources and virtual sessions. Last year they covered topics such as healthy eating, achieving better sleep, financial management, and supporting your mental health

We champion the benefits of an environment where our people can be themselves



**Better Health
at Work Award**

Recognising that our physical environment is a key factor in our people's wellbeing we opened our new Maidenhead office this year. This energy efficient building is designed as an open space, creating opportunities for collaboration and conveniently located in the heart of Maidenhead, with public transport access, and facilities enabling our people to cycle to work, or to charge their electric vehicle. There's also a wellness room providing our people with a private area where they can escape from the hustle of the office to prioritise their well-being or a quiet place to pray.

We are also continuing to invest in the experience of our people working in our Data Centres, implementing a Data Centre Experience programme across all our sites to enhance the working environment of our people, and clients who access our Data Centres.

Once again, our people enjoyed the benefit of a Company Wellbeing Day; an occasion giving as many individuals as possible across Pulsant time through an extended weekend and the chance to disconnect and prioritise self-care. Several people shared photos of how they spent their day on our internal Life at Pulsant Teams Channel, including lots of walks, massages, crafting and even moving into a new home!

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

Safety

Part of bringing our “People First” value to life is making sure that our People and everybody we work with is kept safe, above any other priorities. Health and Safety sits alongside quality, environment, information security and energy management inside the integrated management system we use to set priorities for the company.

Our management team regularly review our policy and arrangements in relation to health and safety. During 2024 we further strengthened the governance around Health and Safety by forming an Executive Health and Safety committee, which provides increased senior level oversight of our safety arrangements.

We have defibrillators available at all our sites to make sure the best help is available should the worst happen

All our sites have dedicated Health and Safety Representatives who acts as the eyes and ears around safety for the site and the people based there and form part of the main Health and Safety Committee which is one of the channels we use to engage with our people on Safety. We also engage with our team on safety through internal communication messages, targeted mandatory training and reference documentation available to everybody. Individuals can also raise concerns directly via our set of Speak-up channels, which includes an anonymous whistleblowing helpline.

Health and Safety checks are included in our due diligence and engagement with suppliers. We demand and review to check that supplier's risk assessments and method statements are suitable for all activities third parties carry out on our sites and operate a work permit system.

During 2024, we are pleased that we have not seen any serious accidents or injuries amongst our team or visitors to our site.

In the last year the number of first aid injuries dropped considerably compared to the prior year.

To help us drive accidents down, our people are encouraged to report near misses and safety concerns so that the root causes can be investigated and addressed, with the aim to proactively prevent more serious harm. We are encouraged by a continued and significant increase in these reports and aim to drive this higher to ensure more concerns are addressed.

During 2024 we added additional server lifts to our sites to ensure there is one available by each data hall to reduce manual handling for our team and clients

Our Health and Safety Performance

	2022	2023	2024
Fatalities	0	0	0
RIDDOR reportable injuries	0	0	0
Lost time injuries	1	0	0
First aid Injuries	5	12	5
Near misses/Safety concerns reported	5	7	19

Inclusion and belonging

Our Values reflect what we expect of ourselves and each other and inclusion and belonging are integral to them. We want Pulsant to be a place where every individual feels valued, respected and empowered to share their perspective, with equal opportunities for growth and success. We believe that diversity of backgrounds and perspectives enhances Pulsant and we strive to be a place where everyone can bring their authentic selves to work.

Following our initial anonymous DE&I survey in 2023, we regularly ask our people if 'I can be myself at work', with a consistently positive NPS, most recently of 68%. In 2024 we conducted independent, and confidential focus groups to test our Inclusion and Belonging Strategy to ensure

our actions are aligned with the priorities of our people. These highlighted positive feedback for our Neurodiversity Awareness Training, our use of Career Stories, which allow people from all backgrounds to showcase their career backgrounds on our all-hands company call, and our flexible working policy, ensuring people can find balance in the way they work.

We're using the insight gained from these sessions to guide our ongoing actions, including supporting additional upskilling for our People Leaders to ensure they are skilled in supporting the different needs of their team and working with external partners to ensure we widen our reach, and our jobs are advertised to as diverse a population as possible.

We believe that diversity of backgrounds and perspectives enhances Pulsant and we strive to be a place where everyone can bring their authentic selves to work



Training and development

During 2024, we significantly expanded our development offering as part of our continued commitment to investing in our people's professional and personal growth, with the aim that Pulsant is a career highlight for everyone who works here. This ongoing dedication is showcased by continually high levels of positions filled through internal mobility, 36% in 2024.

In the last year we've placed considerable emphasis on expanding the quality of what is offered to our people and making it easier for them to access that learning. We launched an internal Learning System – making it easier for people complete and book their learning in one place and ensured everyone at Pulsant received a personalised communication to confirm the outcomes of their development conversations and details of their learning plan.

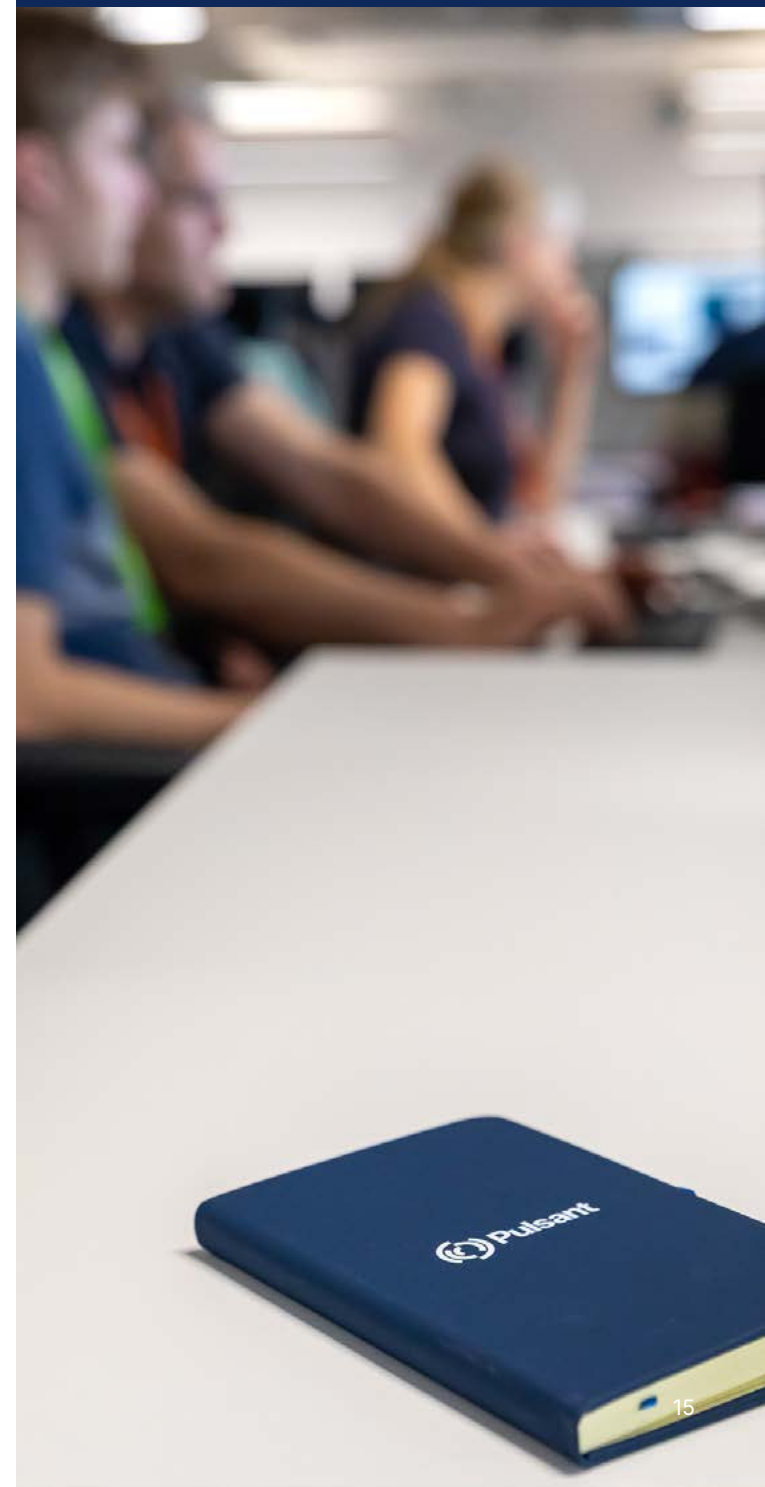
We extended our learning offering by giving everyone access to an eLearning Business License with Udemy, providing high quality eLearning, and launched a new Leading Self curriculum, with a range of interactive workshops on core skill topics, such as Presentation and Communication Skills, Problem Solving, and Influencing.

Recognising the importance our People Leaders have in our organisation, we also launched a new Leading Others Programme. This blended programme contains core and optional elements, ensuring all leaders are skilled in coaching their teams, are well networked, and can build the specific skills that are relevant to them.

Our people have responded positively to the changes in the curriculum, increasing our NPS score on the Survey question 'The training and development at Pulsant is of great benefit to me' by 22%. Ongoing Learning Needs Analysis with our business areas, and feedback surveys are being used to ensure this remains a high priority for us.

Bringing through fresh, new talent into the organisation and the industry is also a key priority for us. In 2024 we expanded our early careers programme by launching our apprenticeship campaign. Hiring five apprentices into our Data Centres represented a significant expansion in our apprenticeship approach and provides the next generation of talent the chance to gain valuable practical experience, whilst also gaining a relevant formal qualification. Our apprentices have been making a meaningful impact since Day 1 and are learning valuable skills from their mentors on site, as well as through their formal training. Following the success of this cohort, we will be expanding this programme with further apprentice hiring in 2025.

Our people show great commitment to their development and their dedication is recognised through our VIP Awards, which celebrates our Values in action. We saw many great examples of our 'Nurture & Grow' value awarded, recognising the personal commitment to development and the support and encouragement for others to do the same.



Our social and community empowerment

In 2024, we relaunched our volunteering programme, evolving from Giving Something Back, to Make an Impact. This refreshed approach places greater emphasis on volunteering and social action, empowering our people to engage with and support their communities through initiatives that drive positive social, environmental, and economic change in the communities where we operate.

We believe that there are many ways to make a meaningful impact whether through volunteering, charity giving, community engagement programmes or supporting teammates. To support these efforts, we continue to offer our People two charity days each year, allowing them to dedicate time to the causes that matter most to them, either individually as part of a team or a Pulsant organised event.

In March 2024 we held an international Women's Day networking lunch, providing an opportunity for team members across Pulsant to connect, share experiences, and build meaningful relationships. Alongside this, we held an engaging quiz, bringing people together both in our offices and remotely to celebrate the day.

In May four groups from across Pulsant came together to take part in our Walk and Talk event, embracing the opportunity to get moving for our mental health while supporting the vital work of Mind. Everyone's generosity helped us raise an impressive £515 a total that was matched by Pulsant, bringing our final donation to an amazing £1030 for Mind.

In August 2024, the North Sales Team dedicated one of their charity days to take on an incredible physical challenge: the Yorkshire Three Peaks all in support of a fantastic cause, the Rainbow Trust Children's Charity. Everyone's generosity helped us raise £1053, a total that was matched by Pulsant, bringing our final donation to an amazing £2106 helping the Rainbow Trust continue their invaluable work supporting families across the UK.

During September 2024, we promoted activities to build awareness of the problems caused by material waste and how we could work together to do better. People could sign up for a beach clean, bring in clothes to donate or swap, or simply make sure to get their recycling right; it all made a difference.

We believe that there are many ways to make a meaningful impact whether through volunteering, charity giving, community engagement programmes or supporting teammates



Throughout November and December our annual Christmas fundraising efforts of Christmas Jumper Day for Save the Children, Mission Christmas supporting Cash for Kids and Food Bank collections and volunteering across the regions provided us with the perfect opportunity to come together and make a meaningful impact on the lives of those who need it most. It wasn't just about raising funds; it was about spreading warmth, kindness, and holiday cheer throughout our local communities. Through these efforts, we were able to create moments of joy and hope for families and individuals facing hardship during the festive season.

Our workplace fundraising efforts have been a way to come together as a team while supporting important causes like Macmillan Cancer Support and Comic Relief, raising money to contribute to these vital charities.

Baking enthusiasts and sweet tooths alike joined in the fun, bringing in delicious homemade treats to share with their teams, all in the spirit of supporting those facing difficult challenges.

Beyond our company wide initiatives, our people dedicated their time, skills, and resources to causes close to their hearts and are passionate about. A few examples included; volunteering at school career days, a charity parachute jump, volunteering at the Liver Patients PPI group and Group Ride for Blood Bikes Scotland.

**Our people dedicated
their time, skills, and
resources to causes close
to their hearts and are
passionate about**



Be a trustworthy business

Good governance

Being a responsible and trustworthy business starts with the accountability at the top of the company. Our board includes an independent chairperson who provide independent input and oversight into the strategic running of the company. The board sets the company's strategic goals and receives regular reports on company performance and risk, including views of stakeholders.

The board delegates day-to-day running of the company to the Senior Leadership team, which includes the CEO, CFO and CPO who are also board directors.

Our ISO 9001, 14001, 27001 and 50001 certified Integrated Management System guides us on the standards against which we measure ourselves. Expectations of company standards and behaviours of the Pulsant team and partners are clearly set out in a set of company policies which are maintained and reviewed regularly to ensure that all legal and regulatory requirements are incorporated

Assurance

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

To provide assurance around the controls we aim to apply, we run an internal audit programme as part of the management system to help support compliance against our standards and identify improvement opportunities.

This is complemented by a programme of external certification audits against a number of recognised standards, including ISO 9001, 14001, 27001 and 50001 and PCI-DSS physical security standards



Sabine Heine-Bickle
Head of Risk and Assurance



Our clients trust us to provide a secure and reliable service that is key to helping them be successful and delivering for the clients that rely on them. We never take this trust for granted.

We are in a unique position as purely UK-based business to be able to offer UK-sovereign data services and a stable legal environment.

Aligning and testing ourselves against internationally recognised standards to ensure the quality and security of our operation and services is a central part to our assurance programme.



Accreditations available per site

	ISO 9001	ISO27001	ISO14001	ISO5001	PCI-DSS
Croydon LN-1	✓	✓	✓	✓	✓
Edinburgh South Gyle SC-1	✓	✓	✓	✓	✓
Edinburgh SC-2	✓	✓	✓	✓	✓
Edinburgh SC-3	✓	✓	✓	✓	
Manchester NW-1	✓	✓	✓	✓	✓
Newcastle NE-1	✓	✓	✓	✓	✓
Newcastle NE-2	✓	✓	✓	✓	
Milton Keynes SE-1	✓	✓	✓	✓	✓
Maidenhead SE-2	✓	✓	✓	✓	✓
Reading SE-3	✓	✓	✓	✓	✓
Reading SE-4	✓	✓	✓	✓	✓
Rotherham YH-1	✓	✓	✓	✓	✓
Our Offices	✓	✓	✓	✓	



Ethical business behaviour

We take seriously our obligations to not facilitate illegal activity including tax avoidance, competition law breaches, money laundering, bribery, or corruption. During 2024 we introduced a comprehensive Ethics Policy covering these topics and completed some specialist training with our commercial team. We have client due diligence controls in place which are fully supported by executive leadership. Sanctions list checks and corporate criminal offence risk assessments are embedded into our operations.

Supply chain diligence

A significant component of our impact on the world around us is via our supply chain and we have aligned our supply chain diligence process aligns with this fact. Our procurement process for major infrastructure components includes a sustainability review that considers the environmental impact of the sourcing and operation of the equipment.

We review all new suppliers before onboarding them, which includes a review of how the company addresses risks in relation to the products we intend to purchase from them. Our Supplier Code of Conduct outlines our expectations around business ethics and sustainability, and we review the performance of our suppliers on a regular basis.

In line with our commitment to combat Modern Slavery in our supply chain, we train the relevant teams in spotting the signs of modern slavery and carry out an annual review of the Modern Slavery approach of suppliers who operate in high-risk sectors.

Speak up channels and whistleblowing

To ensure that issues and concerns are raised, our people and partners have access to several speak up channels. These are regularly communicated to our people and include an independently run whistleblowing helpline, which allows anonymous reporting of concerns for management review.

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 our business is run. Details are also provided of escalation routes, including external authorities. Any matters raised are investigated thoroughly, promptly and in confidence, with the outcome of the investigation reported back to the individual who raised the issue.

Our Supplier Code of Conduct outlines our expectations around business ethics and sustainability



Managing risk

We operate a company-wide risk management programme that incorporates regular reviews of changes to the external business context, as well as internal performance data to ensure risks to the business are identified and required action plans agreed and tracked. Regular reviews take place both at a company-wide as well as at an operational level.

Emerging risks in our supply chain are pro-actively managed through our supplier management programme. This includes due diligence checks of new suppliers prior to any commercial engagement, segmenting suppliers by criticality and risk and carrying out regular reviews of our suppliers' performance and compliance in alignment with their risk and criticality rating.

Protecting data and information

Protecting our clients and our own data and information is a key component of the service we provide. We have in place physical and cyber security controls to protect our sites and our services, which are regularly assessed as part of our integrated management system and aligned with ISO 27001, PCI-DSS physical security controls and NIST cybersecurity framework.

We take protecting the personal data of our people, clients and partners seriously. Our in-house Cyber Security team continuously monitors and evaluates our systems ensuring client data remains secure and confidential.

Details of the controls we apply across our business around security are available in the latest version of our "Security and Trust" document, which forms part of our client assurance pack. We suffered no data breaches during 2024.

During 2024, the UK government designated Data Centres as National Critical Infrastructure. We expect this to result in additional regulation and security requirements which are to be clarified further during 2025. A major advantage of the designation is additional support around security provided to us from the National Cyber Security Centre (NCSC) and also the National Protective Security Authority (NPSA).

Our in-house Cyber Security team continuously monitors and evaluates our systems ensuring client data remains secure and confidential

Providing a reliable service

We operate an ITIL-aligned service management processes, with a focus on robust change and risk management, incident response and problem management.

Our dedicated Major Incident management team focuses on leading the resolution of any client or business impacting major incidents, including the communication to affected parties and the root cause analysis following the incident. This has supported our continuing low levels of service-impacting major incidents.

We operate our data centre sites with the resilience of the service we provide in mind. This includes the assessment and mitigation of any environmental risks of each site. All sites are also equipped with infrastructure that provides resilience against grid power cuts, and failures of single instances of key equipment such as cooling and power backup. We run a programme of planned maintenance including specialist partners to keep our data centres in the best condition and level of service resilience.

Our dedicated Major Incident management team focuses on leading the resolution of any client or business impacting major incidents

Two-way communication

The trust of our clients is never taken for granted and we aim to be transparent about our performance, both with our clients and wider stakeholders. To help our clients track the performance of our services, we provide a public status page for our service uptime and outages (status.pulsant.com).

We operate a client experience survey programme consisting of interaction-specific spot checks and in-depth surveys that gives us insight into how we can add more value for our clients and helped to shape our plans going forward.



Appendix 1:

2024 environmental data table and methodology

	2019 (Baseline)	2022	2023	2024
Electrical power consumption (kWh)	91,982,927	88,482,503	83,399,621	78,144,241
Greenhouse gas emissions (TCO2E)				
Scope 1	899	551	523	354*
Diesel/gas-oil	137	108	101	85*
Fugitive emissions of F-gas	608	380	368	234*
Natural Gas	154	63	54	36*
Scope 2				
Electricity (location-based)	25,462	17,193	17,330	16,180*
Electricity (market-based)	4,739	2,475	81	24*
Scope 3	19,263	14,190	15,777	14,826*
Business travel	233	92	168	158*
Capital Goods	4,587	2,413	3,566	2,925*
Employee Commuting	452	501	477	493*
Fuel- and Energy-Related Activities	6,034	6,097	5,374	5,355*
Purchased Goods & Services	7,957	4,436	6,362	5,894*
Waste Generated in Operations	-	2	2	1*
Total Scopes 1, 2, 3 (location-based)	45,625	31,934	33,630	31,360*
Total Scopes 1, 2, 3 (location-based) emissions kgCO2e per £ revenue	0.457²	0.353	0.333	0.313

* Data verified in accordance with Verification Opinion Statement

² Intensity ratio excludes operations acquired by Pulsant post-2019, otherwise included in baseline GHG emissions

Methodology

Scope and Boundaries

Pulsant sets boundaries based on financial and operational control.

Reporting protocols

This report has been prepared in accordance with the requirements of ISO14064-1.

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. Base year recalculation was completed in 2024 in order to apply improved emissions factor set in relation to sectoral emissions intensities (see 'Restatements').

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's UK full dataset 1990 - 2021, including conversion factors by SIC code.

Information on renewable electricity

Pulsant secured power fully backed by Renewable Energy Guarantees of Origin (REGOs) for all sites where Pulsant is responsible for power procurement, including all data centres, throughout 2024. From 01/01/2024 to 30/09/2024, renewable energy was procured through SSE Green Electricity tariff independently verified by EcoAct, an Atos company (CDP Accredited Provider). From 30/09/2024 to 31/12/2024, energy backed by Renewable Energy Guarantees of Origin has been certified from Brook Green Supply.

Using the GHG Protocol Corporate Standards' market-based approach the above enables us to report "0" emissions under Scope 2 with the exception of occupation of premises whose power is procured by a third-party landlord.

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.

Reason for the intensity measurement choice

Based on the nature of our business, as well as following the recommendations of the SECR legislation we chose sales revenue as it reflects the growth in our business performance.

Estimation

This report contains estimations covering 1.3% of scope 1 and of 0% the total reported tCO₂e value. Estimations have been required to present a complete picture where source data is unavailable and were calculated in line with the best available methods in reference to the GHG Protocol Accounting and Reporting Standard 2015. 30% of our total reported tCO₂e value is subject to high qualitative uncertainty due to the use of spend-based industry carbon intensity factors in relation to Capital Goods, and Purchased Goods and Services.

Data from Suppliers

Pulsant have endeavoured to use supplier-specific data where feasible. Data provided by suppliers data represents 14% of combined footprint in relation to purchased goods and services, and capital goods categories.

Biogenic (outside of scopes) emissions

Biogenic emissions are calculated to be 9001 tCO₂e in 2024, of which use of HVO biofuel contributed 10 tonnes and UK electricity consumption contributed 8991 tCO₂e.



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