

## Modern Slavery Act Statement

Year Ending 31st December 2021

### Our commitment

As a technology company operating in the UK, Pulsant has a zero-tolerance approach to modern slavery and human trafficking and is fully committed to acting with integrity and ethically in all business relationships. Pulsant recognises responsibility as a business to ensure that there is no business involvement directly in modern slavery through its own operations or indirectly by association through the supply chain. Pulsant deploys systems and controls in order to prevent modern slavery from presenting itself anywhere within the business or the supply chain.

### Our risk profile

As a technology company operating in the UK, we have assessed our risk of engaging with slavery and exploitation and identified three key areas of focus;

- **Our people** – because we have direct control and responsibility in relation to working conditions.
- **Electronics procurement** – because while 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.
- **Construction, security & cleaning services** – because these are higher risk sectors that we engage with directly in relation to the operation of our UK facilities.

### Our actions

In year ending 31<sup>st</sup> December 2021, we have:

- Reviewed our overall modern slavery risk assessment in relation to high-risk sectors, countries, and reconfirmed the key areas of focus.
- Strengthened due diligence processes in relation to supplier onboarding to improve effectiveness of modern slavery risk assessment for each new supplier.
- Assessed the approach of 69 suppliers, covering 75% of spend.
- Trained everyone in the procurement and assurance teams on modern slavery and how to address risk.
- Rolled out our Supply Chain Code of Conduct to clarify expectations of suppliers, including in relation to treatment of workers in their operations and supply chains.

### **Our people**

- Reviewed our policies and their deployment including but not limited to those in relation to equality, working conditions and living wage.
- Improved our Whistleblowing Policy to clarify how to handle suspected labour abuse.

### **Electronics procurement**

- Assessed the approaches of our technology vendors to modern slavery and conflict minerals.
- Identified two vendors with whom improvements in their approach were felt necessary, then either engaged in follow-up actions or confirmed off-boarding decisions.

### **Construction, security & cleaning services**

- Trained our facilities management team on recognising and actioning signs of labour abuse.
- Approached our contractors in these sectors who do not publish slavery statements, confirming their approach to managing the risks, and collaborating to support their awareness as needed.

### **Going forwards**

In 2022 we aim to continue monitoring against the following Key Performance Indicators;

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

The CFO has responsibility for ensuring this policy complies with all legal and ethical obligations.

Signed

**Bradley Petzer**  
**Chief Financial Officer**

13 January 2022