



PULSAR*GROUP

Modern Slavery Statement 2025

1. INTRODUCTION

This Modern Slavery Statement ("**Statement**") for Pulsar Group PLC and its subsidiaries, including its subsidiaries operating the Isentia, Pulsar and Vuelio brands globally ("**Pulsar Group**", "**the Group**", "**we**" and "**our**"), is made in respect of the year ended 30 November 2024. We have combined our efforts across key geographies to highlight our global approach to ensuring safe and sustainable operations and compliance with evolving modern slavery regulatory requirements.

The purpose of this Statement is to outline our approach to ensuring that we have robust frameworks and processes in place to minimise the risk of modern slavery in our business operations and supply chain.

2. ABOUT PULSAR GROUP

Pulsar Group is an AIM-listed innovator, pioneering an audience-first approach to the marketing, communications and media industries. Our SaaS products and services help thousands of organisations – from leading consumer brands and blue-chip enterprise companies, to marketing agencies and public sector organisations – understand their audiences and stay relevant in an increasingly noisy world.

Pulsar Group's Modern Slavery Statement is submitted by Pulsar Group Plc in accordance with section 54 of the UK Modern Slavery Act 2015, and by Isentia Pty Ltd ABN 002 533 851 in accordance with the Australian Modern Slavery Act 2018 (Cth). It covers the actions that Pulsar Group has taken and outlines our intent to take further action throughout our next financial year ending November 2025. It was prepared jointly by Pulsar Group's UK, Australia, finance, legal, and human resources teams.

Globally, Pulsar Group has over 900 employees across 11 countries.

3. CHIEF EXECUTIVE OFFICER REMARKS

We conduct our business with honesty, in good faith, and in compliance with the law. We set ourselves high standards in our business practices, from our approach to corporate social responsibility, to establishing sound business ethics, including compliance with all applicable laws and regulations. We expect businesses we work with to meet the same level of business ethics.



We are committed to undertaking our business in a manner which respects the rights of individuals in the communities in which we operate and to not tolerating any form of modern slavery or human trafficking in our business and supply chain.

The Board of Directors of Pulsar Group plc (“the Board”), assisted by the Audit Committee, is responsible for the overall strategic direction of the Pulsar Group including ensuring robust systems are in place for identification and management of risk, including the risk of slavery and human trafficking in our business or supply chain. We have taken, and are continuing to take, steps to ensure that our businesses identify risk areas in their supply chains and to implement policies and procedures to eliminate those risks.

We recognise that slavery can occur in many forms, as considered in the Act. This can include slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

We are publishing this global modern slavery statement to address both required regional regulations and to set a high standard for human rights in all countries where we operate.

4. MODERN SLAVERY RISKS

Our Supply Chain

Pulsar Group’s supply chain covers 11 primary countries in which the Group has offices and/or employees:

- Australia
- Canada
- Indonesia
- Malaysia
- New Zealand
- Philippines
- Singapore
- Thailand
- United Kingdom
- United States of America
- Vietnam

We have identified that key expenditure within our supply chain relates to the procurement of goods and services primarily relating to the supply and conversion of media content and data and technology hosting. Software development and IT equipment are key inputs. As a technology company, we do not manufacture goods nor handle raw materials or commodities. Ancillary expenditure within the supply chain includes professional services and office supplies and services.



Modern Slavery Risks

For a company like Pulsar Group, the risk of modern slavery resides primarily in its upstream supply chain, where the Group's internal policies and practices can be challenging to implement and sustain. Media content for example is provided by a multitude of organisations across the countries in which the Group operates and visibility of some suppliers' practices can be limited.

Within our APAC operations a FY20 review of potential risks of modern slavery practices across its operations and supply chains considered risks linked to modern slavery practices such as types of services and geographic locations with a higher risk of having modern slavery practices. As a consequence, through liaison with our offices in South East Asia, particular attention was given to their direct arrangements relating to office cleaning and to their supply chains. Within our EMEA&NA operations the suppliers we use for general office equipment and services are based in the UK.

We have identified as areas with no or low risk those operational activities that are directly undertaken by our employees as all of our businesses have comprehensive employment policies and practices, including flexible working, diversity and equal opportunities and grievance policies which help to minimise the risk of modern slavery.

Areas of higher risk, in particular geographical areas known as having higher risk, will inform the prioritisation of our supplier engagement activities.

5. ASSESSING AND ADDRESSING THE RISK OF MODERN SLAVERY PRACTICES

The recent focus of our activity to address the risk of modern slavery practices on an ongoing basis across our operations and supply chain has been related to developing global policies; engaging with any higher-risk suppliers, and reducing our total number of suppliers.

Our finance and legal team members, who have significant awareness of modern slavery risk, control the process for finalising supplier contacts and our terms require compliance with applicable laws.

A Supplier Code of Conduct has been developed in all regions as a Pulsar Group-wide policy. This articulates the ethical and legal standards the business expects of its suppliers and notes Pulsar Group's zero tolerance for modern slavery abuses.

Additionally, we have updated the Pulsar Group's Anti-Slavery Policy which outlines our commitment to the raising awareness of and the prevention of modern slavery. The Anti-Slavery Policy was adopted across the Pulsar Group in 2023 and we will run refresher sessions in 2025 on the Anti-Slavery Policy and use of the Supplier Code of Conduct to ensure staff remain aware of, and familiar with, the principles.



If a supplier is found to be in violation of the Group's Supplier Code of Conduct, Pulsar Group can take a variety of actions, including limiting or excluding suppliers from future business relationships.

Key corporate governance policies are under review or have been updated in order to reflect the expansion of the Pulsar Group and to apply similar rules and approaches globally. We have a Whistleblowing Policy that allows employees to report violations of law and other misconduct, and prohibits retaliation against a person who acts in good faith.

We are actively engaged in seeking to reduce the number of suppliers from which we purchase goods and services globally and to introduce measures to remove suppliers from the supply chain if these have not been used in a specified period. This will enable us to have greater understanding of and control over our supply chain.

Pulsar Group will continue to refine these practices and policies over the course of several years. The Group is implementing the fundamentals now and for the future to ensure we follow good practice and address our mandatory reporting requirements.

As part of our plan to continuously improve our efforts to mitigate modern slavery, Pulsar Group's ESG Strategy has been developed in alignment with the UN Sustainable Development Goals (UN SDGs), in particular SDG8 'Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all'. This ESG strategy aligned to the UN SDGs will underpin our anti modern-slavery activities.

6. MEASURING THE EFFECTIVENESS OF OUR ACTIONS

Pulsar Group intends to conduct an annual supplier review to determine the effectiveness of its controls to mitigate exposure to modern slavery and to report any outcomes to its Board.

The Pulsar Group Board will review the Group's actions in respect of addressing the risk of modern slavery practices and will take ultimate responsibility for ensuring they are effective and appropriate.

7. CONCLUSION

Pulsar Group considers suppliers to be important partners in its business activities and our Supplier Code of Conduct is designed to develop mutually beneficial trusting relationships with our suppliers based on the concepts of fairness, coexistence, transparency and co-prosperity.



Pulsar Group believes its responsibility for products and services goes beyond just ensuring high quality software and insights products for the market. We also believe that we are responsible for ensuring that our entire supply chain upholds appropriate standards in respect to human rights, labour and the environment.

This Statement was approved by the Pulsar Group plc Board of Directors on 23 June 2025.

Joanna Arnold
Chief Executive Officer