

PULSAR\*GROUP

# Anti-Slavery Policy

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## Purpose

The term modern slavery encompasses human trafficking; forced work through mental or physical threat; people being treated as a commodity to be bought or sold, and people being physically constrained or having restrictions placed on freedom of movement. It is a crime and a violation of fundamental human rights.

The purpose of this policy is to outline Pulsar Group Plc (formerly Access Intelligence) and its subsidiaries (including its subsidiaries operating the Isentia, Pulsar and Vuelio brands globally) (Pulsar Group) commitment to acting ethically and with integrity in all its business dealings and relationships and to implement effective systems and controls to ensure modern slavery is not taking place in its business or its supply chain.

## Scope

This policy applies to everyone working for the Pulsar Group or on its behalf in any capacity across its global business, including team members at all levels, directors, officers, employees, agency workers, seconded workers, volunteers, agents, contractors, external consultants, third-party representatives and business partners. This policy does not form part of any team member's contract of employment and it may be amended at any time.

## Statement of Commitments

The Pulsar Group is committed to:




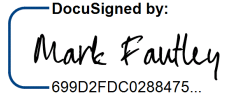
- supporting the objectives of the Modern Slavery Act 2015 in the UK and similar legislation in all other countries in which it or its suppliers operate;
- ensuring there is transparency in its own business and that no labour used directly in the provision of services to clients of the Pulsar Group is obtained by means of slavery or human trafficking;

- most team members working directly within the Pulsar Group's business having employee status and being employed on terms in full compliance with all local employment laws and regulations;
- not knowingly entering into business with any other organisation which supports or involves itself in slavery, servitude or forced or trafficked labour;
- the assessment of risk of modern slavery in ALL procurement of goods or services;
- the communication of Pulsar Group's zero-tolerance approach to modern slavery to suppliers during the procurement process;
- the acknowledgement and confirmation by all key suppliers of the Pulsar Group Supplier Code of Conduct;
- regular review of the Pulsar Group supplier list for modern slavery risk including in-depth supplier checks should a potential risk area be flagged;
- the building of long standing relationships with suppliers based on trust and understanding of shared values and standards including the standards set out in this policy;
- terminating relationships with suppliers who breach this policy or the Pulsar Group Supplier Code of Conduct;
- the education and training of its employees to increase awareness of the risks around modern slavery and the actions required by Pulsar Group to ensure the prevention of modern slavery in the Pulsar Group supply chain;
- ensuring processes are in place to facilitate the raising of concerns about any suspicion of modern slavery in any parts of the Pulsar Group business or the supply chains of any supplier to the Pulsar Group;
- encouraging openness and supporting anyone who raises genuine concerns in good faith under this policy or Whistleblowing Policy, even if they turn out to be mistaken; and
- taking disciplinary action (including dismissal for misconduct) against employees who are found in breach this policy.

## Document Version Control

This policy shall be reviewed if required changes are identified to address an identified weakness, a change in business activities which may affect the validity of this document.

The current version of this policy, together with its previous versions, shall be recorded below:

Version	Change	Author	Approver	Signature
1.0	Creation	Kate Fraser VP of HR 01/03/2019	Mark Fautley CFO 01/03/2019	
2.0	New branding	Kate Fraser VP of HR 11/11/2019	Mark Fautley CFO 11/11/2019	
3.0	Reviewed to reflect size and global structure of the Group and the introduction of a Group-wide Supplier Code of Conduct	Kate Fraser VP of HR 04/05/2023	Mark Fautley CFO 31/05/2023	
4.0	New branding	Kate Fraser VP of HR 23/04/2024	Mark Fautley CFO 21/5/2024	<div>DocuSigned by:</div>  <div>699D2FDC0288475...</div>