

PULSAR*GROUP

Supplier Code of Conduct

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Purpose

Introduction

Pulsar Group Plc (formerly Access Intelligence) and its subsidiaries (including its subsidiaries operating the Isentia, Pulsar and Vuelio brands globally) (Group, Company or Pulsar Group) are committed to implementing and adhering to the highest levels of transparency, integrity and law-abiding behaviour in all business operations. The Pulsar Group consistently endeavours to create and maintain long lasting relationships with suppliers who share these values and commitment to doing the right thing.

In support of this commitment, Pulsar Group strongly encourages all of our suppliers to promote the requirements detailed within this Supplier Code of Conduct (the "Code") within their own supply chain.

Purpose of this Code

The Pulsar Group wants to ensure that Suppliers have a clear understanding of, and are motivated to act in a manner consistent with, our commitment to our values. This Code allows for full transparency through the negotiation process, from the beginning of our relationship.

Suppliers should comply with the requirements detailed within this Code at all times, and ensure that all subcontractors and vendors who they work with also abide by these terms.

Pulsar Group strictly enforces a policy that all Suppliers must act in compliance with relevant laws, including Anti-Bribery and Corruption; the reporting of suspected instances of bribery, corruption or fraud is encouraged and disclosers shall not be subject to any disadvantage for doing so.

This Code is not intended to modify or conflict with any terms and conditions of an existing contract, or contract under negotiation. In the event of a conflict between the regulations set out herein and the terms of a contract, the latter will take precedence.

Scope

This Supplier Code of Conduct (“Code”) applies to all Pulsar Group suppliers, business partners, contractors, consultants, subcontractors and their workers, group and affiliates and applies to all services and products that Pulsar Group purchases, on a global basis.

The Supplier agrees that:

1. It will comply with the requirements in this Code; and
2. It has appropriate systems in place to ensure continuous compliance and to demonstrate such compliance.

By trading with the Pulsar Group the Supplier agrees, and ensures to procure that its supply chain agrees, to adhere to this Code in order to enforce and promote sound social, ethical, environmental and economic practices.

Principles

Pulsar Group expects all Suppliers to abide by all applicable laws, regulations and industry standards. As well as this, all Suppliers should conduct their business and operations in an ethical and honest manner, in accordance with the following principles:

Conflicts of Interest

Suppliers should not act for any personal interests or benefits, but with the benefit of the business in mind. A conflict of interest arises where personal interests interfere with the ability to make objective decisions on behalf of the company.

If such an occurrence arises, and the Supplier believes that an actual or potential conflict of interest exists, they should contact their relevant business partner to disclose such conflict to AI.

High Standards of Ethical Practice and Good Governance

Pulsar Group’s Suppliers must adhere to all laws and regulations applicable to international business transactions, including the following:

- Anti-boycott laws;
- Anti-money laundering laws;
- Controls on exports and re-exports of products, services and technology;
- Customs and import regulations; and
- Economic trade sanctions and embargoes.

Suppliers should abide by the relevant legislation in relation to bribery and corruption, including (but not limited to) the U.K Bribery Act, the U.S. Foreign Corrupt Practices Act and any similar legislation in all countries in which the Pulsar Group conducts business. Suppliers must maintain the integrity of their books and records. The Supplier should have relevant policies and procedures and training in place to assist their workers to comply with the relevant laws in this area.

Accordingly, Suppliers should not, nor should they attempt to offer, or authorise any kind of bribe, kickback or promise in order to obtain or retain an improper business advantage. Bribes include anything of value, such as money or gifts, that would influence a party to give any kind of improper advantage in exchange for such bribe.

On the other hand, Suppliers should also ensure that when giving business gifts, entertainment or hospitality of any kind, these should not be lavish or too frequent and should not be made for any improper purpose. Giving cash of any amount is not acceptable.

The Supplier shall make available to Pulsar Group any information relevant to their compliance with this section of the Code, and co-operate with any reasonable audit requests in relation to this

Working Environment

Pulsar Group is built on a foundation of respect and valuing other's contributions and creating a safe and collaborative environment. Our Suppliers therefore must reflect our values and minimise the risk to the health and safety of its team members and anyone authorised to be on the premises. They have a responsibility to treat others respectfully in the workplace at all times, maintaining a workplace that is inclusive and free from unlawful discrimination and harassment.

Likewise, the Supplier has a duty to comply with the applicable laws and regulations in relation to wages, hours of work, overtime, health & safety and other benefits.

It is integral that Suppliers uphold human rights and have zero tolerance towards any kind of Modern Slavery abuses – this includes human trafficking, slavery, servitude and forced labour. Suppliers must also abide by child labour laws and ensure that workers' decision to work is made freely and that they receive fair pay for their work, equal or exceeding the level required by applicable laws and regulations.

Pulsar Group expects its Suppliers to have in place and implement relevant policies and procedures to promote education and awareness of Modern Slavery, and to ensure that human rights are respected.

Diversity and Inclusion

Diversity and inclusion are at the heart of our business and apply across all levels. Pulsar Group is an equal opportunities employer, and we endeavour to maintain an open, inclusive working environment where collaboration is the central focus and diverse ideas and perspectives are welcomed.

Pulsar Group strives to work with Suppliers who add to these values, perform at high levels and thrive on diversity and a range of perspectives. Our Suppliers should integrate diversity and inclusion into their own processes via relevant policies and procedures and training on the topic, particularly in relation to the hiring process.

Suppliers must not discriminate against any team member, or candidate, on the basis of race, colour, age, national origin, physical or mental disability, history of disability, ancestry, citizenship status, political belief or affiliation, religion, gender, transgender, gender identity, marital status, status as a parent, sexual orientation, veteran status, genetic information, or other basis that has the effect of substantially affecting an individual's performance at work or creating an intimidating, harassing or hostile working environment for them.

Information and Assets Security

As a corporation renowned for dealing with data frequently, one of Pulsar Group's core values is that privacy is respected and that we, along with Suppliers, comply with all laws relevant to the collection, use and protection of information not generally available to the public. This includes personal information, confidential and proprietary information, trademarks and other rights (whether or not subject to copyright or patent protections). Suppliers are expected to exercise care and implement the relevant precautions when handling such information to ensure compliance with all applicable laws governing intellectual property rights, including protection against disclosure, patents, copyrights, and trademarks.

We highly value the security of personal information obtained from our business partners, team members and customers. As such, when handling any such personal information, Suppliers should comply with the relevant legislation and regulations (including, but not limited to, the General Data Protection Regulation and UK Data Protection Act 2018 and any similar legislation in all countries in which the Pulsar Group conducts business), and are expected to exercise care when handling such data.

As a result of their engagement with Pulsar Group, Suppliers may come into contact with certain information about Pulsar Group, its team members and customers (including customers of Pulsar Group's customers), which is protected information (proprietary and confidential information) and may not be disclosed. Suppliers must comply with the confidentiality and non-disclosure terms in their agreements with Pulsar Group as well as all applicable privacy laws and data protection laws, to the extent they apply to protected information and the services provided to Pulsar Group.

Moreover, Pulsar Group suppliers should not seek to access protected information unless they have authorisation to do so. Suppliers must only use protected information for the purposes provided in

their agreement with Pulsar Group. Such information is never to be shared to third parties or anyone else not authorised to receive it, or where there is no legitimate business reason to be sharing it.

Where Suppliers have any access to Pulsar Group assets, such as facilities, equipment or funds, this property must be appropriately safeguarded by Suppliers and only used for the purpose for which it was provided. Suppliers have a responsibility under this Code to protect any such property they have access to against any theft, misuse, damage or loss.

Pulsar Group Suppliers must at all times comply with Pulsar Group's Information Security Management Policy which includes Supplier Security Controls. All policies are available in the Trust Centre.

Environmental Responsibility

Pulsar Group is committed to environmental responsibility. We seek to make a positive environmental impact through our actions, and we expect our Pulsar Group Suppliers to share these responsibilities.

Pulsar Group Suppliers are expected to comply with all local and national environmental laws, regulations and directives of the countries they are working in, manufacturing in or trading with, as applicable. The Supplier shall ensure that the goods or services it provides and its operations comply with all applicable environmental laws and treaties relating to waste disposal, emissions, discharges and the handling of hazardous and toxic materials.

The Supplier will actively push to develop more environmentally friendly products/service solutions and takes manufacture, use and disposal into consideration, including the possibility of circular supply chains.

The Supplier will have a business plan in place, and be acting on it, to minimise their environmental impact continually and adopting or working towards internationally recognised environmental standards and/or behaviours.

The Supplier measures and monitors its environmental impacts, and measures are in place to effectively reduce identified environmental impacts (e.g. recycling, single use packaging, general plastic usage, energy efficiency measures).

Monitoring

To facilitate the monitoring of suppliers' compliance with this Code of Conduct, Pulsar Group expects suppliers to:

- (i) develop and maintain all necessary documentation to support compliance with the described standards; such documentation must be accurate and complete;
- (ii) provide Pulsar Group's representatives with access to relevant records demonstrating Supplier's compliance with this Code, upon request;

(iii) Respond promptly to reasonable inquiries from Pulsar Group's representatives in relation to the implementation of the Code of Conduct.

Sanctions

Breach of the Code may result in actions being invoked against that Supplier, in addition to any contractual or legal remedies. The actions applied will depend on the nature and seriousness of the breach and on the degree of commitment shown by the supplier in breach to its obligations under the Code. The range of actions available to be imposed on the Supplier includes but is not restricted to the following:

- Formal warnings – that the continued non-compliance will lead to more severe actions;
- Disclosure of nature of breach to all Pulsar Group subsidiaries and associate companies;
- Immediate termination of contract, without recourse.

Raising a Concern

We thank you in advance for your cooperation with this Code.

Pulsar Group operates in a responsible and ethical manner, and therefore expects any actual or suspected breach of this Code to be brought to the attention of Pulsar Group's Legal Team (legal@pulsargroup.com) or Pulsar Group's Information Security Team (infosec@pulsargroup.com) without undue delay.

Individuals should feel empowered to act in accordance with this Code and report something that does not feel right. Pulsar Group treats all disclosures seriously and confidentially, and any further investigation undertaken or authorised by Pulsar Group would not be disclosed to anyone other than those who have a legitimate need to know. Pulsar Group would never tolerate any retribution against an individual raising a concern under this Code in good faith.

Document Version Control

This policy shall be reviewed annually as an absolute minimum, or 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	Original version	Stephanie Faghiri Commercial Contracts Manager 09/09/2023	Mark Fautley CFO 05/12/2023	
2.0	New branding	Stephanie Faghiri Commercial Contracts Manager 23/04/2024	Mark Fautley CFO 13/5/2024	DocuSigned by:  699D2FDC0288475...