

With reference to Section 54 of the Modern Slavery Act (2015) Pulsar Measurement (henceforth referred to as PM) has a zero-tolerance approach to any form of modern slavery taking place within its business or supply chains. Modern slavery can take the form of servitude, human trafficking and forced labour. PM is committed to acting ethically, transparently and with integrity in all its business dealings.

### **Organisation & supply chains**

PM consists of facilities based in the UK located at Malvern, Worcestershire, and Earls Colne, Essex, with further facilities located in Largo, Florida, USA and Long Sault, Ontario, Canada. The Malvern and Long Sault facility designs, manufactures, commissions, and supports process measurement & control products and the Essex facility is an Electronic Manufacturing site. The Largo facility commissions and supports process measurement & control products. PM sells either direct to the end user or via global distributors into Water & Wastewater, Industrial, Environmental, M&M, O&G, Marine, and agricultural industries. PM is part of the TASI Group who in turn are owned by the Berwind Corporation. The Malvern, Long Sault and Essex facilities are Original Equipment Manufacturers, the Essex facility is a tier 1 supplier for other internal Tasi businesses and external business entities. The Malvern, Essex and Long Sault facilities use Tier 1, Tier 2 and Tier 3 suppliers during procurement.

### **Our policies**

PM employees are encouraged to report any serious business irregularities to the Managing Director or to the Berwind Corp. third-party 24-hour reporting service.

The PM company handbook includes policies covering equal opportunities, discrimination, harassment, anti-bribery, trade union recognition & trade union membership.

PM Human Resources implements a thorough recruitment policy to ensure eligibility to work in their respective countries which results in the safeguarding of employees against forced labour or human trafficking.

### **Due diligence and risks in supply chain**

PM will do everything it practically can to reduce the risk of modern slavery in its supply chains even though its current annual turn-over is less than the criteria set out in UK law.

PM use established suppliers which are selected via an in-house evaluation process. Supplier modern slavery statements are requested, where possible, as part of the evaluation process. Starting with its critical vendors PM will check its supply chain to establish any risks regarding compliance to the Modern Slavery Act.

**Effective action taken to address modern slavery**

PM will disclose any identified instances of modern slavery and the results of corrective actions taken to address such occurrences annually.

**Training on modern slavery**

PM will implement general awareness training to ensure that employees know the signs of modern slavery, are aware of relevant company HR policies and know the mechanism for raising complaints or concerns. Training will be carried out annually or when there are significant changes to legislation or policies. If suppliers do not have a modern slavery statement themselves, then they will be encouraged to sign up to Pulsar's zero tolerance approach to this offence.

**Signed:**



**Date:** 06/02/21

**Georgina Perkins, Managing Director**

Financial year ending 31/12/2021.