



Statement of Senior Management Commitment to Leadership and Culture of Compliance in the Control of Sanctions and Trade in Dual-Use Products

We, the senior management of BlueStar Europe Distribution BV, recognise the critical importance of complying with all laws and regulations related to sanctions and the trade in dual-use products. We understand that our company, as an industry leader, has an ethical and legal responsibility to operate transparently, ethically and in accordance with international and local laws. In this context, we are committed to leading by example and fostering a strong and sustainable corporate compliance culture throughout the organisation.

OUR COMMITMENT

Exemplary Leadership:

We are committed to acting as role models for all employees, demonstrating an unwavering commitment to compliance with sanctions and dual-use laws in all our business interactions.

Compliance Culture:

We will actively work to foster a culture of compliance in the company, where legal compliance is both valued and prioritized in all business activities.

We will support and promote ongoing awareness and education among our employees to ensure they are all informed about dual-use laws and sanctions regulations and related internal policies.

Due diligence:

We will implement rigorous due diligence processes into our business operations to evaluate our partners and suppliers, ensuring they comply with all applicable laws and regulations.

Transparency and Communication:

We will maintain open and transparent communication about compliance policies, encouraging employees to raise questions and concerns about dual-use products and sanctions compliance.

We will inform all employees about progress and challenges in compliance with sanctions and dual-use laws.

Supervision and Accountability:

We will establish effective internal oversight systems to ensure the proper implementation of our compliance policies throughout the company.



We will hold each other and our stakeholders accountable for effective compliance with sanctions and dual-use laws, and we will act quickly to address any issues that arise.

Continuous Improvement:

We are committed to continuous improvement of our compliance policies and processes. We will strive to learn from past experiences, adapt our policies as necessary, and adopt best practices in the industry.

By signing this pledge, we solemnly commit to leading our company with integrity and responsibility, ensuring that compliance with sanctions and dual-use laws is a fundamental pillar of all our operations. We recognize that this commitment is essential to protect our company's reputation, maintain the trust of our customers and stakeholders, and contribute positively to the global community in which we operate.

Date: 15/05/2025

Signature:

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Manel Baranera
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Manel Baranera
Chief Operating Officer
BlueStar Europe Distribution BV