



Slavery and Human Trafficking Statement of BlueStar Europe Distribution BV

For 2023

BlueStar is committed to combating in all its forms the risk of modern slavery and human trafficking, both in our own business and within our supply chains, as part of our commitment to conduct all aspects of our business ethically and with integrity.

Our Business and supply chain.

BlueStar Europe Distribution BV is established in The Netherlands with a registered office and distribution centre and is a wholly owned subsidiary of United Radio Incorporated dba BlueStar established in Kentucky USA. BlueStar Europe Distribution BV has Branch offices established in numerous countries in the EMEA region as listed at the end of this statement (all collectively referred to hereafter as “BlueStar”).

BlueStar is the leading global distributor of solutions-based Digital Identification, Mobility, Point-of-Sale, RFID, IoT, AI, AR, M2M, Digital Signage, Networking, Blockchain, and Security technology solutions which are sourced from manufacturers and software solution partners in Europe, USA and Asia.

BlueStar distributes exclusively to Value-Added Resellers (VARs) in over 100 countries almost exclusively in the EMEA region.

BlueStar’s own labour force is mostly contracted employees supplemented by agency workers depending on work levels.

BlueStar Policies.

BlueStar has an internal Code of Conduct which applies to all BlueStar officers and employees, temporary staff, interns, subcontractors, and anyone who supplies services to BlueStar. All persons subject to the Code must behave ethically and with integrity upholding the company’s own principles of respect and trust, transparency, integrity, equality, commitment and compliance with all laws, regulations and BlueStar’s internal rules applicable to our business. All employees have access to the Code on our web based Human Resources portal and must sign their acceptance of and adherence to our Code and any non-compliance may result in penalties or dismissal.



As part of our commitment to upholding the highest standards of ethics, integrity, and transparency, BlueStar has established a Whistleblowing Portal, a secure platform where any employee who has information about any wrongdoing, misconduct, or ethical concerns can submit a secure report. We fully understand the importance of confidentiality in whistleblowing matters, and we are fully committed to protecting whistleblowers, whose identity and the details of their report will be handled with the utmost discretion. Whistleblowers can also choose to report 100% anonymously.

The whistleblowing reporting procedure can be used by all employees (regardless of the type of employment) in BlueStar. Customers, suppliers, and other stakeholders can raise a complaint through the General Complaints Channel.

BlueStar employees found to be in violation of BlueStar's internal policies or any laws or regulations applicable to BlueStar's business may be subject to disciplinary actions which can include penalties or dismissal.

Assessment, processes, and management.

31% of the products sold by BlueStar originate from the European Union or the United Kingdom, 37% from China, 9% from the U.S. and 23% from the rest of the world.

86% of the suppliers we purchase from are established in the European Union or the United Kingdom, and 9% from the U.S.A. and 4% from Asia.

Over 80% of our purchases by value are made from suppliers who have implemented policies against modern slavery.

BlueStar uses the Global Slavery Index to gather information on likely risks by country regarding product manufacture, supplier or customer country.

BlueStar is committed to combatting risks of modern slavery within our business and supply chain and we plan to develop specific policies and processes related to modern slavery as part of our Corporate Social Responsibility (CSR) and our Environment, Social, and Governance (ESG) programmes, as we understand the actions we need to take in identifying and addressing modern slavery risks within our operations and throughout our supply chain will be constantly ongoing and evolving and must be embedded in a framework to assess their effectiveness through key performance indicators.

Training and education.

All new employees of BlueStar receive training on our Code of Conduct and training sessions are given to certain employees periodically for specialized areas of compliance with laws and regulations related



to BlueStar's business activities. BlueStar will create and implement an educational and training programme for employees specifically related to modern slavery.

BlueStar approval.

This statement is issued for all BlueStar companies, including BlueStar Europe Distribution BV UK Branch for whom this statement is made pursuant section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2023.

This statement has been approved by the BlueStar Bord of Directors on 24th of May 2024, and is signed by Manel Baranera, Chief Operating Officer on behalf of BlueStar Europe Distribution BV:

Signature:

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Manel Baranera
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Date: 24th of May 2024

Registered office:

- The Netherlands - BLUESTAR EUROPE DISTRIBUTION B.V.

List of Branches:

- Belgium - BlueStar Europe Distribution BV
- Czech Republic - BlueStar Europe Distribution B.V., organizační složka
- Denmark - BlueStar Denmark, Filial af BlueStar Europe B.V., Holland
- Finland - BlueStar Europe Distribution B.V. sivuliike Suomessa
- France - BlueStar Europe Distribution B.V
- Germany - BlueStar Europe Distribution B.V., Zweigniederlassung Deutschland
- Hungary - BlueStar Europe Distribution B.V. Magyarországi Fióktelepe
- Ireland - BlueStar Europe Distribution B.V.
- Italy - BlueStar Europe Distribution B.V.
- Norway - BlueStar Europe Distribution B.V. Norwegian Branch
- Poland - BLUESTAR EUROPE DISTRIBUTION B.V. Spółka z ograniczoną odpowiedzialnością Oddział w Polsce
- Portugal - BlueStar Europe Distribution B.V. sucursal em Portugal
- Spain - BlueStar Europe Distribution B.V. sucursal en España
- Sweden - BS Europe Distribution B.V. Sweden filial
- UK - BlueStar Europe Distribution B.V. UK Branch