



Slavery and Human Trafficking Statement of BlueStar Europe Distribution BV

For 2025

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 where it has its 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, as well as a wholly owned trading entity in Dubai, U.A.E. (all collectively referred to hereafter as “BlueStar”).

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

BlueStar supplies from its Distribution Centre in Eindhoven, The Netherlands, top-tier, vetted specialty hardware and software solutions exclusively to Value-Added Resellers (VARs), managed service providers, system integrators, and independent software vendors in over 120 countries almost exclusively in the EMEA region.

Our global customer base supports businesses and organizations worldwide in industries such as retail, hospitality, warehousing, transportation, logistics, healthcare, and public safety by helping them track high-value assets, accept credit card payments, manage warehouse operations, care for patients, keep communities safe and much more.

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

BlueStar Policies.

Code of Business Conduct and Ethics of BlueStar Europe Distribution BV



From our origins in 1923 through to the present day, BlueStar has been guided by our mission of serving and exceeding expectations of all our business partners, whilst keeping people safe, connected, and informed. BlueStar Europe adheres to the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, aiming to contribute positively to economic, environmental, and social progress through sustainable business practices. BlueStar Europe is committed to maintaining the highest standards of ethical conduct and integrity in all our business activities and to combatting bribery and other forms of corruption. To this end, we have established in our **Code of Business Conduct and Ethics** available at <https://www.bluestarinc.com/en-gb/bluestar-code-of-business-conduct-and-ethics>. This Code applies to all employees, officers, and directors of BlueStar Europe and is shared with all relevant personnel. BlueStar Europe will, and expects our business partners to also, implement effective anti-corruption measures to avoid adverse impacts and we encourage our business partners to join us in observing to the fullest extent possible the guidelines we have established, including respecting human rights, ensuring fair employment practices and contributing to the effective abolition of child labour and the elimination of forced labour.

Internal Code of Conduct

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.

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.

Whistleblowing Portal

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 and is available at [https://whistleblowersoftware.com/secure/BlueStar Whistleblowing Portal](https://whistleblowersoftware.com/secure/BlueStar_Whistleblowing_Portal).

Customers, suppliers, and other stakeholders can raise a complaint through the General Complaints Channel at <https://www.bluestarinc.com/en-gb/bluestar-general-complaints-channel>.



Assessment, processes, and management.

33% of the products sold by BlueStar originate from Europe, 24% from China, 20% from the U.S. and 23% from the rest of the world.

86% of the suppliers we purchase from are established in Europe (E.U., U.K., Norway and Switzerland), 8% from the U.S.A. and 6% from Asia.

Over 85% of our purchases by value are made from suppliers who have implemented declarations and policies against modern slavery.

89% of our purchases by value are made from suppliers who have implemented a Human Rights declaration and policy.

BlueStar uses a risk-based approach to assess modern slavery risks across its global supply chain. This approach draws on data from the Global Slavery Index and focuses on three key factors: the prevalence of modern slavery in each country, the vulnerability of the population, and the government's response. By analysing these factors, BlueStar can identify high-risk countries where the risk of modern slavery is greatest.

These high-risk countries are characterized by high levels of modern slavery and vulnerability, coupled with inadequate government responses. Identifying them enables BlueStar to direct enhanced due diligence efforts to where they are needed most. The company also works proactively with suppliers and customers in these regions to ensure compliance with its ethical standards, thus reducing the risk of modern slavery in its supply chain.

None of the products sold in 2025 originated from countries in which the population is at a high risk of being vulnerable to modern slavery.

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 2025.

This statement has been approved by the BlueStar Board of Directors on 29th of May 2026, 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: 27th of May 2026

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. NUF
- 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

Subsidiary

- UAE - BlueStar Trading MEA DWC-LLC