

# BLUE STAR MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

## PURPOSE

Blue Star Group (New Zealand) Limited engages a workforce made up of many individuals with diverse skills, values, backgrounds and experiences. Blue Star recognises that people are our key resource, they are doers and we, at Blue Star, have policies and processes in place to ensure that slavery or human trafficking is not taking place in any part of our business or our supply chain.

## COVERAGE

Blue Star Group (New Zealand) Limited has a number of trading divisions throughout New Zealand which are covered by this policy and statement. These include the following business units: -

- Blue Star Print & Packaging (Auckland)
- Blue Star Constellation (Auckland)
- Blue Star Swanson (Auckland)
- Blue Star Parnell (Auckland)
- Brebner Print (Napier)
- Blue Star Jackson (Wellington)
- Blue Star Promote (Auckland and Wellington)
- Blue Star Gracefield (Wellington)
- Spectrum Print (Christchurch)
- Webstar (Auckland)

## MEANING OF SLAVERY AND HUMAN TRAFFICKING

We recognise that slavery and human trafficking can occur in many forms, such as forced labour, child labour, domestic servitude, sex trafficking and workplace abuse and it can include the restriction of a person's freedom of movement whether that be physical, or non- physical.

## OUR SUPPLY CHAINS

Given the diverse nature of our business, we have third party product suppliers and service providers throughout the world who supply goods and services to the Group for the various different business units listed above. Many of our suppliers vary in both the size of their organisations and the amount that we spend with them. Our most significant and material purchase is paper, which we effectively convert during the printing process. All paper that Blue Star business units converts, is imported into New Zealand market.

Blue Star has a mature and robust supply chain and its supply partners have all been vetted over a number of years. Blue Star operates a centralised procurement function and all material sourcing is controlled through Head Office.

In all instances, material contracts are implemented, managed and reported upon at Head Office by the Procurement Manager. Centralised management of the supply chain greatly enhances the vetting process of our suppliers and has also enabled the organisation to conduct site audits of overseas production facilities.

## RISK ASSESSMENT

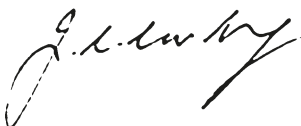
The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of strict policies and procedures, the New Zealand market place, as well as the management structure built into our business operations and the knowledge and skills of our employees.

In relation to the risk of slavery and human trafficking within any of our supply chains, we continuously review the supplier network to consider how to:

- Identify and prioritise potential risk areas across our supply chains, such assessment based upon geography, the product or service we are being provided with and the nature of the business transaction.
- Incorporate this issue into our existing compliance risk assessments, which are carried out annually;
- Mitigate the risk of slavery and human trafficking occurring in the high risk areas identified, more specifically by:
  - Evaluating whether to issue questionnaires to high risk suppliers and service providers requesting information regarding due diligence procedures within their own supply chains;
  - Implementing action plans based on such responses, which seek to work with suppliers to resolve areas of risk and/or modify our supply relationships in order to mitigate or remove risks; and
  - Conducting site visits, where appropriate.

## RESPONSIBILITY FOR OUR POLICY

Although the board retains ultimate accountability for this policy, the board has delegated responsibility for the implementation of the policy to the Group Chief Executive Officer. In turn, the Group Chief Executive Officer has delegated to the Shared Services Manager the administration of this policy, including its reporting.



Jill Cowling  
**Group Chief Executive Officer**  
**Blue Star and Webstar**

Effective from January 2020

Reviewed 01 September 2024