



## Prohibited and Restricted Countries

### ● PROHIBITED COUNTRIES

Vinmar Group personnel globally are **strictly prohibited** from conducting any business, directly or indirectly, with:

- Governments, entities, or individuals in prohibited countries
- Any associated parties including (but not limited to): corporations, suppliers, customers, ship-to parties, end users, shippers, vessels, carriers, agents, brokers, freight forwarders, banks, etc.
- Any entity registered in or operating from the listed countries below

**Prohibited Countries:** Cuba, Syria, Iran (e.g., IRISL), North Korea, Sudan & Darfur Region, Crimea, Luhansk & Donetsk regions of Ukraine

### ADDITIONAL STRICT RESTRICTIONS (Shipping & Sanctions Compliance)

It is **strictly prohibited** to:

- Load Vinmar Group cargo on vessels that:
  - Fly the flag of a prohibited country
  - Call at or tranship through ports in prohibited countries
- Use any person, entity, or vessel listed on the U.S. Department of the Treasury **SDN (Specially Designated Nationals) List**

### ● RESTRICTED COUNTRIES

Any business involving entities in Restricted Countries must undergo **full Compliance Due Diligence approval**.

This includes (but is not limited to):

- |                   |               |                      |           |
|-------------------|---------------|----------------------|-----------|
| • Customers       | • End users   | • Agents             | • Brokers |
| • Suppliers       | • Individuals | • Freight forwarders | • Banks   |
| • Ship-to parties | • Shippers    |                      |           |

All such engagements must complete the Vinmar Due Diligence Form, include the Compliance Representations & Warranties Certificate, and receive prior approval from the Compliance Department.

### Restricted Countries:

- |                            |                                |               |
|----------------------------|--------------------------------|---------------|
| • Albania                  | • Democratic Republic of Congo | • Russia      |
| • Belarus                  | • Iraq                         | • Serbia      |
| • Burma / Myanmar          | • Lebanon                      | • Somalia     |
| • Bosnia & Herzegovina     | • Libya                        | • South Sudan |
| • Burundi                  | • Macedonia                    | • Ukraine     |
| • Croatia                  | • Montenegro                   | • Venezuela   |
| • Central African Republic | • Pakistan                     | • Yemen       |
|                            |                                | • Zimbabwe    |