



Anti-Boycott Policy

Vinmar is committed to conducting business ethically, lawfully, and in compliance with all applicable anti-boycott, trade control, and anti-discrimination laws globally. Participation in unsanctioned foreign boycotts or discriminatory trade practices is strictly prohibited for all employees, contractors, subsidiaries, and third parties acting on Vinmar's behalf.

Key Principles

No Participation in Unsanctioned Boycotts

Employees may not:

- Participate in, agree to, or facilitate any foreign boycott.
- Refuse to do business with countries, entities, or individuals based on boycott-related restrictions or blacklist criteria.
- Discriminate in employment or business relationships based on race, religion, sex, nationality, or national origin.
- Provide information regarding personal characteristics of individuals or entities for boycott-related purposes.

Escalation and Compliance Review

All boycott-related requests—written or oral, including contracts, tenders, letters of credit, questionnaires, or other communications—must be escalated to Compliance before taking any action. No transaction may proceed until prohibited language is removed or approved.

Responsible Third-Party Conduct

Suppliers, distributors, agents, and consultants must comply with Vinmar's Anti-Boycott standards. Contractual obligations, audit rights, and due diligence measures are implemented where needed to mitigate boycott-related risks.

Reporting Concerns / Speak-Up

Employees and partners are encouraged to report potential violations to Compliance or via the Vinmar Speak-Up Hotline. Retaliation against good-faith reporters is strictly prohibited. Compliance will ensure timely reporting to authorities where required by law.

Training and Awareness

Anti-boycott compliance is included in Vinmar's global training programs, with role-based focus where appropriate. Policies, guidance, and updates are accessible on the company intranet to ensure awareness across all operations.

Why This Matters

Following these standards prevents discriminatory practices, ensures compliance with global anti-boycott laws, and protects Vinmar's legal, regulatory, and reputational standing. Acting responsibly fosters trust with customers, partners, and regulators worldwide.