



Global Anti-Slavery & Human Trafficking Policy

Vinmar is committed to conducting business ethically and ensuring that modern slavery, human trafficking, forced labor, and child labor are not tolerated in any operations or supply chains globally.

“Respecting human rights and eradicating modern slavery is central to our commitment to ethical business practices and responsible global operations.”

— Vinmar Board of Directors

Who This Applies To

This policy applies globally to all employees, contractors, agents, interns, consultants, volunteers, business partners, suppliers, and other third parties. It includes all Vinmar subsidiaries and operations worldwide, including entities subject to jurisdiction-specific reporting requirements (e.g., Australian Modern Slavery Act 2018).

Key Principles

1. Integrity & Human Rights

- Zero tolerance for slavery, servitude, forced labor, human trafficking, or child labor
- Compliance with all applicable US and foreign anti-slavery laws, including UK Modern Slavery Act 2015 and Australian Modern Slavery Act 2018
- Expectation that all suppliers and partners uphold the same standards

2. Responsible Operations & Supply Chains

- Multi-tiered global supply chains require risk-based monitoring, including onboarding, contractual anti-slavery clauses, and sustainability requirements
- Suppliers operating in high-risk geographies or sectors may undergo enhanced due diligence and audits
- Corrective actions, remediation plans, or termination may be enforced if non-compliance is identified

3. Raising Concerns / Speak-Up

- Employees and partners must report suspected modern slavery to management, HR, Compliance, or the Vinmar Speak-Up Hotline
- Good-faith reporters are fully protected from retaliation, dismissal, or disciplinary action

4. Due Diligence & Risk Assessment

- Suppliers are assessed based on geography, sector, and compliance history
- High-risk suppliers are subject to additional scrutiny and site audits
- Findings inform corrective actions, continuous improvement, and statutory reporting requirements



5. Training & Awareness

- Annual global compliance training covers anti-slavery, human rights, Code of Conduct, and related compliance topics
- Updates, guidance, and lessons learned are communicated across the organization

6. Monitoring, Effectiveness & Continuous Improvement

- Regular audits, questionnaires, and inspections ensure compliance
- Key Performance Indicators (KPIs) include:
 - Number of suppliers assessed and audited
 - Non-compliance incidents identified and remediated
 - Training completion and engagement metrics
 - Improvement in supplier risk ratings over time
- Lessons learned update policies, procedures, and training programs globally

Why This Matters

Following this policy:

- Protects Vinmar's reputation and supports responsible global commerce
- Promotes transparency, accountability, and measurable progress in combating modern slavery
- Strengthens partnerships and reinforces a culture of integrity across all operations

Full Policy

Vinmar maintains a comprehensive Global Anti-Slavery & Human Trafficking Policy covering governance, due diligence, risk assessment, training, and statutory reporting. The full policy is available upon request and provides detailed guidance supporting Vinmar's commitment to ethical and responsible business practices worldwide.