



## **Ethics & Compliance**

Vinmar is committed to conducting business with integrity, transparency, and respect for the laws and regulations that govern our global operations. Our compliance framework supports responsible business practices and reflects the principles set out in the Vinmar Global Code of Conduct.

Operating across international markets requires adherence to a wide range of legal and regulatory requirements. Vinmar maintains policies, internal controls, and training programs designed to promote ethical decision-making and ensure compliance across all areas of our business.

### **Our Compliance Commitments**

#### **Integrity in Business Dealings**

Vinmar maintains zero tolerance for bribery and corruption. Employees and third parties must comply with all anti-corruption laws and company policies.

#### **Fair and Lawful Competition**

We compete fairly in every market. Employees must not engage in agreements or coordination with competitors that restrict competition.

#### **International Trade Compliance**

All trade activities comply with applicable sanctions, export controls, and customs requirements. Internal procedures ensure compliance across all jurisdictions.

#### **Anti-Boycott Compliance**

Participation in unsanctioned foreign boycotts is prohibited. Any related requests must be reported to Compliance.

#### **Financial Integrity and Responsible Partnerships**

Accurate record-keeping, strong internal controls, and partner due diligence help prevent money laundering, fraud, and other illicit activity.

#### **Reporting Concerns / Speak-Up**

Employees and partners are encouraged to raise concerns through management, Compliance, or the Vinmar Speak-Up Hotline. Retaliation against good-faith reporting is strictly prohibited.

#### **Supporting Policies**

Learn more about our approach by reviewing the Code of Conduct, Anti-Slavery & Human Trafficking, Health, Safety & Environment (HSE), Anti-Boycott, Anti-Bribery & Anti-Corruption (ABAC), and Speak-Up/Whistleblower resources.

#### **Why This Matters**

These commitments protect Vinmar's reputation, ensure compliance with laws, and support responsible global commerce. Every individual plays a role in upholding our standards by following procedures and using available resources.