Vinmar Prohibited and Restricted Countries Policy

1. Screen Every Transaction

All Vinmar transactions must undergo sanctions and restricted party screening, regardless of country. Screening applies to all relevant parties: customers, suppliers, end users, ship-to parties, shippers, agents, brokers, freight forwarders, financial institutions, vessel owners/operators, carriers, and vessels. Screening includes review of sanctions risks associated with ownership and control of relevant parties.

Additional due diligence may be required based on country risk, transaction risk, ownership structure, product risk, or potential diversion concerns.

2. Prohibited Countries — Do Not Proceed Without Prior Compliance and Legal Approval

Except as authorized by applicable law and approved in advance by Compliance and Legal, Vinmar personnel may not directly or indirectly engage in business involving the following jurisdictions:

Prohibited Countries / Regions

Crimea Region of Ukraine | Cuba | Donetsk Region of Ukraine | Iran | Luhansk Region of Ukraine | North Korea

This restriction applies to governments, entities, individuals, entities owned or controlled by such parties, and any related parties connected to these jurisdictions.

3. Shipping & Vessel Restrictions

Do Not Use / Do Not Route Without Approval:

- Route, tranship, deliver, or discharge Vinmar cargo through a Prohibited Country without prior Compliance and Legal approval.
- Use vessels listed on applicable sanctions lists.
- Use vessels owned, controlled, or operated by sanctioned parties.
- Use vessels flying the flag of a Prohibited Country.

Enhanced Due Diligence and Compliance Approval Required:

Vessels with recent, frequent, or unexplained port calls in Prohibited Countries must be escalated to Compliance and approved prior to use. Compliance will determine any additional due diligence or approvals required before the vessel may be used.

4. High-Risk Jurisdictions — Enhanced Due Diligence and Prior Compliance Approval Required

Transactions involving the following jurisdictions require enhanced due diligence and prior Compliance approval:

High-Risk Jurisdictions

Belarus | Burundi | Democratic Republic of Congo (DRC) | Iraq | Lebanon | Libya | Myanmar (Burma) | Russia | Somalia | South Sudan | Venezuela | Yemen | Zimbabwe

Additional Elevated-Risk Jurisdictions (Compliance Review Required)

Transactions involving elevated-risk jurisdictions, including the UAE, Hong Kong, Singapore, Kazakhstan, Turkey, or other jurisdictions identified by Compliance, must be reviewed and approved by Compliance before proceeding.

Enhanced due diligence may include, as determined by Compliance, completion of the Vinmar Due Diligence Form, Compliance Representations & Warranties Certificate, beneficial ownership review, end-use/end-user verification, source of funds review, vessel ownership review, and any additional documentation requested by Compliance.

Policy Owner: Compliance | **Version:** 2.0 | **Last Reviewed:** July 2026