

# Prohibited Countries

Vinmar personnel globally are **ABSOLUTELY PROHIBITED** from conducting any business, **including transshipment**, directly or indirectly, with the government of or any entity (corporation, individual, shipper, vessel, carrier, agent, broker, banks, etc.) of, or associated with, or flying the flag of, any of the following sanctioned and embargoed countries:

1. CUBA
2. SUDAN
3. IRAN (e.g., IRISL)
4. SYRIA
5. NORTH KOREA
6. CRIMEA & SEVASTOPOL REGION

Transshipment through port of a Prohibited Country is **STRICTLY PROHIBITED.**

# Restricted Countries

Vinmar companies and its personnel may commence\* business with a counter party (i.e., customer, supplier, corporation, individual, shipper, vessel, agent, broker, banks, etc.) involving the following countries only after conducting proper screening for “blocked parties” and performing end-use due diligence):

- CONGO, DEMOCRATIC REPUBLIC
- COTE D’IVOIRE (IVORY COAST)
- KAZAKHSTAN
- IRAQ
- BURMA/MYANMAR
- BALKANS (Albania, Bosnia-Herzegovina, Serbia, Montenegro, Croatia, Macedonia)
- LIBERIA
- BELARUS
- OMAN
- ZIMBABWE
- YEMEN
- LIBYA
- PAKISTAN
- UKRAINE
- RUSSIA

Note: Proper due diligence requires the Vinmar Due Diligence Form for Prospective Counter Parties to be completed in its entirety and screened through Visual Compliance and then approved by the Legal/Compliance Department. As advised by the Legal/Compliance Department, The Counterparty Compliance Representations and Warranties Certificate must be signed by the counter party prior to commencing a business relationship (i.e., issuing a pro forma invoice or entering the counter party into SAP).

\*Vinmar companies, its personnel and its authorized agents may initiate discussions with a counterparty in the restricted country only after first screening such party’s contact information (i.e., name of the company, its principle officer (CEO, Owner, Director) and the individual who will be contacted) through Visual Compliance to confirm that the party is not a Prohibited Party.

Transshipment through port of a Restricted Country is permitted.