

# Control Policy On Sanctions And Embargoes In Trade Relations, Exports, And Dual-Use Goods



## OBJECTIVE

The purpose of this Policy is to **detail the principles of action in the knowledge of the third parties with whom we relate and analysis of**

**compliance risks in commercial operations.** Control policy on sanctions and embargoes in trade relations, exports, and dual-use goods



## OUR COMMITMENTS

- **Comply with the laws that regulate international trade,** as well as the regulations applicable to imports, exports and the international sanctions legitimately imposed by the States or organizations that are in accordance with the legislation of the EU and the United States, mainly.
- **Not to carry out transactions, directly or indirectly, with countries, third parties or economic sectors sanctioned or embargoed** by international trade regulations.
- **Avoid any collaboration with persons and/or entities that evidence unethical behavior;** that may be aimed at illicit activities, money laundering or financing of terrorism, that are subject to sanctions or any other illegal action.
- **Demand the highest levels of ethics and transparency** in our processes of selection, approval, negotiation and formalization of relationships with third parties.
- **To act and require third parties that have business relationships with our Company to act in accordance with our ethical principles,** safety and environmental policies and respect for human rights, ensuring a long-term sustainable relationship.
- Perform the necessary actions, within reason, to **identify and know (due diligence) the third parties with whom our Company is going to establish business relationships,** including the identification of the ultimate beneficial owner (UBO), determining who it is, how it acts, places where it operates and how it makes use of our products.
- Use **economic funds from legitimate sources** and **comply with the regulations on money laundering and terrorist funding** in force in the countries where we operate.
- **Control payments** from/to tax havens and Politically Exposed Persons (PEP).
- **Collaborate with international organizations** that ensure compliance with international trade regulations, export control, sanctions and embargoes, as well as the prevention of money laundering and the financing of terrorism, alerting the relevant authorities in the event that transactions suspected of non-compliance with regulations are identified.
- Cooperate in good faith and proactively with **investigations and audits** that are carried out.
- **Report any suspected or actual non-compliance** with trade laws, regulations or restrictions that may result in sanctions to the Office of Ethics and Compliance. To this end, Cepsa has internal channels developed for this purpose to facilitate the communication of possible irregularities with the Audit, Compliance, and Ethics Committee of the Board of Directors, including the Ethics and Compliance Channel ([canaletica@cepsa.com](mailto:canaletica@cepsa.com)).

## Scope de application

**This Policy applies to Cepsa, the Group's subsidiaries where effective control is exercised, their directors and employees, and to third parties with whom there are legal relationships and who have adhered to it.**

Additionally, persons acting as representatives of the Group in companies and entities not belonging to the Group, or where our Company does not have effective control, shall promote, to the extent possible, the implementation of principles and guidelines consistent with those set forth in this Policy.