POLICY

Sanctions and due diligence policy

SOLVENTARA S.L. (in formation). Version 1.0, 2026-09-29. Due diligence means checking who a client really is before working with them.

1. Purpose and scope

This policy explains how SOLVENTARA S.L. (in formation) avoids doing business with sanctioned or high risk people, companies, sectors or sources of payment. It applies to every sale, purchase, payment and shipment, and to the company's partners and collaborators.

2. Legal framework

Spanish and EU law: Union Customs Code (Reg. 952/2013), VAT Law 37/1992, dual use Reg. (EU) 2021/821, Reg. (EC) 2271/96 and GDPR. Cuban law applicable to the buyer: DL 133/2026, MINCEX Res. 126/2026, MEP Res. 103/2026 and BCC Res. 102/2026. As a risk we manage, not as law we are bound by: US Executive Order 14404, OFAC FAQs 1251, 1256, 1258, 1262, 1264 and 1265, and 15 CFR 734.4.

3. Position on the Blocking Statute

The company does not comply with the laws listed in the annex to Reg. (EC) 2271/96. When we turn away someone who appears on a non EU country's list, it is our own commercial decision, based on the risk to our banking, our logistics and our reputation. If any authority or business partner demands compliance with a law in that annex, we will notify the European Commission within 30 days.

4. Who we do not work with

Cuban state entities and their subsidiaries. Also GAESA, CIMEX, GECOMEX, Transimport, Consumimport, CORATUR, DUNA, Tecnoimport, GEMAR, Banco Exterior de Cuba, RAFIN, BFI and any entity 50 % or more owned by GAESA, MININT or MINFAR. And any person or company on the EU, UN, OFAC SDN or Cuba Restricted List lists, or controlled by one.

5. Excluded products

Dual use goods (goods that could also have a military use), energy, telecoms or defence equipment, and any product with more than 10 % US origin content.

6. Payments

EUR only, by bank transfer, 100 % in advance, from accounts outside Cuba whose owner we have identified. Never USD, cash, crypto assets or banks on sanctions lists. Someone else may pay for the client only with a signed agreement to pay on its behalf and proof of where the money comes from.

7. Due diligence (checking the client)

Before the first order we collect and file: the mipyme's incorporation papers and tax ID (NIT), its import authorisation, its owners and its beneficial owner (the person who really owns or controls it), the account that will pay and a signed statement that it has no link to state or sanctioned entities. We apply the standards of Law 10/2010 voluntarily.

8. List checks and records

On every order we check the client, its owners, the payer, the supplier, the freight agent and the shipping line against the EU, UN, OFAC SDN and Cuba Restricted List lists. We file the result with its date and keep it for 5 years.

9. Logistics

Delivery FCA Valencia (handed over in Valencia) or FOB port of origin (loaded on the ship at origin), under Incoterms 2020, the standard international delivery terms. We export with our own export declaration and our own EORI (EU customs ID). Cargo insurance with a sanctions clause where applicable.

10. Red flags

Payments from accounts that have nothing to do with the client, unexplained rush, changes of destination or of the person receiving the goods, refusal to say who really owns the business, or prices that make no commercial sense. Any of these stops the order until it is cleared up.

11. Owner and review

Owners: the company's directors. We review this policy every three months and whenever the law changes. Version 1.0, approved 2026-09-29.

Signature and date	Compliance contact
[Nombre y NIF de cada socio fundador]	**info@solventara.com**