

# EURABELT FUELS GROUP

Compliance Division

## CERTIFICATE INTEGRITY POLICY

### *Sanctions Screening Certificates*

Document Reference: EFG-COMP-CIP-002

### 1. PURPOSE

This Certificate Integrity Policy establishes the principles governing Sanctions Screening Certificates issued by Eurabelt Fuels Group - Compliance Division. These certificates are designed to be **authoritative proof of screening** — secure, verifiable, and tamper-proof documents that organisations can rely upon for their compliance records.

### 2. THE VALUE OF EURABELT FUELS GROUP CERTIFICATES

Eurabelt Fuels Group has invested significantly in creating a certification system that provides **genuine value** to organisations conducting sanctions screening. Our certificates are not merely records of a search — they are authoritative documents backed by rigorous security measures and permanent verification systems.

#### 2.1 Data Sourced Exclusively from Government Authorities

Every certificate is backed by screening against data sourced **EXCLUSIVELY** from the six official governmental sanctions authorities:

1. United States — OFAC (Office of Foreign Assets Control)
2. European Union — EU Council CFSP Consolidated List
3. United Kingdom — OFSI (Office of Financial Sanctions Implementation)
4. Canada — Global Affairs Canada SEMA List
5. United Nations — Security Council Consolidated List
6. Australia — DFAT Consolidated List

No third-party data aggregators or commercial databases are used. This means our certificates represent screening against the same official data that governments themselves publish.

#### 2.2 Cryptographic Data Integrity

The underlying sanctions data is cryptographically verified using SHA-256 hashing. Every source file is authenticated, every import is verified, and every record maintains an unbroken chain of custody from governmental source to search result.

### 3. CERTIFICATE SECURITY FEATURES

Eurabelt Fuels Group certificates incorporate multiple security features that make them **impossible to forge or falsify**:

#### 3.1 Unique Reference Number

Each certificate receives a unique reference number that is permanently recorded in the Eurabelt Fuels Group database. This reference can be verified at any time through the official verification portal.

#### 3.2 QR Code Verification

Every certificate includes a QR code that links directly to the verification portal. Scanning the QR code instantly confirms the certificate's authenticity and displays the original screening details. This QR code is cryptographically linked to the certificate data.

#### 3.3 Countdown Timer / Timestamp Validation

Original certificates include time-sensitive elements that cannot be reproduced after the fact. The precise timestamp of issuance is permanently recorded and displayed, creating a temporal fingerprint that cannot be forged.

#### 3.4 Central Verification Database

All certificate data is stored in the central Eurabelt Fuels Group verification database. Any certificate can be verified against this authoritative record. A forged certificate would fail verification instantly.

#### FORGERY IS IMPOSSIBLE

The combination of unique reference numbers, cryptographic QR codes, timestamp validation, and central database verification makes it impossible to create a fraudulent certificate that would pass verification. No matter how sophisticated the attempt, a forged certificate will fail when checked against the official Eurabelt Fuels Group verification system.

### 4. CERTIFICATE IMMUTABILITY

Certificates issued by Eurabelt Fuels Group are **PERMANENT AND IMMUTABLE**. This is a fundamental principle of our system, not a policy choice.

#### 4.1 Certificates Cannot Be Deleted

Once a certificate is issued, it **cannot be deleted, removed, or expunged** from the Eurabelt Fuels Group system. This applies regardless of:

- Requests from the screened party
- Requests from the party who conducted the screening
- Payment or financial inducement
- Legal demands (except as provided in Section 4.3)
- Any other form of pressure or request

## 4.2 The Principle of Immutability

Just as a sanctioned person cannot simply request removal from an official sanctions list, a certificate recording a screening result cannot simply be deleted. The certificate is a historical record of a screening performed at a specific moment in time. That historical fact cannot be erased.

This immutability is **essential to the integrity of the entire system**. If certificates could be deleted upon request, the system would have no credibility. Users could not trust that records were complete. The value of every certificate would be undermined.

Eurabelt Fuels Group will not compromise this principle for any consideration. We are building a 100-year legacy, and that legacy depends on absolute integrity.

## 4.3 The Only Exception: Issuing Authority Request

The **only** circumstance under which a certificate could be revoked or annotated is upon formal request from one of the six issuing governmental authorities (OFAC, OFSI, EU Council, Global Affairs Canada, UN Security Council, or DFAT).

This exception exists because the certificate reflects information published by these authorities. If an authority determines that its published information was in error, a formal request from that authority may result in annotation of affected certificates to reflect the correction.

Even in this case, the original certificate record is not deleted. An annotation is added noting the correction, preserving the historical record while acknowledging the updated information.

### STATEMENT OF PERMANENCE

Eurabelt Fuels Group will NOT delete, remove, or expunge certificate records upon request from any party other than the six issuing governmental authorities. This is not negotiable. The integrity of our system — and the value of every certificate we issue — depends on this absolute commitment to permanence.

## 5. WHAT CERTIFICATES REPRESENT

A Sanctions Screening Certificate issued by Eurabelt Fuels Group is **authoritative proof** that:

7. A screening query was submitted to the Eurabelt Fuels Group Sanctions Portal
8. The query was processed against official governmental sanctions data from the six authoritative sources

9. The result (match or no match) was accurately recorded
10. The certificate was issued with tamper-proof security features
11. The certificate is permanently verifiable through the official verification portal

Our certificates are designed to be relied upon. They are not merely informational — they are **evidentiary documents** suitable for compliance records, audit trails, and due diligence documentation.

## 6. APPROPRIATE CONTEXT

While our certificates are authoritative proof of screening, users should understand the appropriate context:

- Certificates reflect the state of the sanctions databases at the time of screening
- Sanctions lists are updated by issuing authorities; new designations may occur after screening
- For ongoing relationships, periodic re-screening is recommended
- Users with complex regulatory requirements should seek appropriate legal advice

These points do not diminish the value of our certificates. They are standard considerations for any sanctions screening, regardless of provider. Within these parameters, Eurabelt Fuels Group certificates provide reliable, verifiable, authoritative proof of screening.

## 7. 100-YEAR LEGACY

Eurabelt Fuels Group is building a certification system designed to operate for the next 100 years. This long-term vision shapes every aspect of our approach:

- Permanent records that outlast any individual
- Immutable integrity that cannot be compromised
- Verification systems designed for long-term operation
- Governance structures ensuring continuity across generations

When you receive a certificate from Eurabelt Fuels Group, you receive a document backed by an organisation committed to being here — maintaining the same standards of integrity — for the next century.

## 8. CERTIFICATE VERIFICATION

Any certificate can be verified through the official Eurabelt Fuels Group verification portal at:

<https://sanctions.eurabeltfuels.eu/verify-certificate.php>

Verification confirms the certificate's authenticity and displays the original screening details. Certificates that cannot be verified should not be relied upon.

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**EURABELT FUELS GROUP**

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*Building Integrity Through Transparency*