

Response to GDC Case No. 20260716000000572 – Compliance Information

Dear Compliance Team,

With reference to the payment currently under compliance review, please find below the requested information.

Payment details:

Remitter: SEA RIVER PRODUTOS NAUTICOS LTDA

Beneficiary: QINGDAO BETTER AND BETTER ROPE CO., LTD.

Amount: USD 5,636.58

Remittance Reference: 071346848732026

Foreign Exchange Contract: No. 26297884, dated 10 July 2026

Brazilian Foreign Exchange Transaction Registration: 000611879005

Electronic Dossier: No. 280

GDC Process: 20260716000000572

1. Full name, address, place of registration and business line of the remitter

Legal name: **SEA RIVER PRODUTOS NAUTICOS LTDA**

Brazilian Taxpayer Identification Number – CNPJ: **82.322.348/0001-60**

Registered address: Avenida Juscelino Kubitschek de Oliveira – Ld, No. 651, Cidade Industrial de Curitiba – CIC, Curitiba, State of Paraná, ZIP Code 81280-140, Brazil.

Place and jurisdiction of registration: Curitiba, State of Paraná, Federative Republic of Brazil.

Business line: The company operates in the manufacture, importation, wholesale distribution and sale of nautical and marine products, offshore equipment, ropes and related products, personal and professional safety equipment, and other related industrial and commercial products.



2. Ownership and control of the remitter

SEA RIVER PRODUTOS NAUTICOS LTDA is a privately held Brazilian limited liability company.

Its direct shareholders and ultimate individual beneficial owners are:

- **Rosa Maria de Lima Simioni** – Brazilian national – **52%** – Shareholder and CEO; - Brazilian People Registracion Number (CPF): 358.825.819-15
- **Jefferson Luiz Bietkoski** – Brazilian national – **20%** – Shareholder; Brazilian People Registracion Number (CPF): 024.408.719-90
- **Andre Felipe Bietkoski** – Brazilian national – **1%** – Shareholder; Brazilian People Registracion Number (CPF): 064.760.399-38
- **Mauricio Alexandre Froder** – Brazilian national – **1%** – Shareholder; Brazilian People Registracion Number (CPF): 011.472.790-20
- **Rodrigo Simioni** – Brazilian national – **26%** – Shareholder. Brazilian People Registracion Number (CPF): 007.426.899-64

Total shareholding: 100.00%.

The company's management and legal representation are exercised by **Rosa Maria de Lima Simioni**, in her capacity as Shareholder and Managing Director, in accordance with the company's Articles of Association.

All shareholders are individuals based in Brazil. The company has no Russian shareholder, beneficial owner, manager or controller.

3. Whether the remitter has any affiliate in Russia

No.

SEA RIVER PRODUTOS NAUTICOS LTDA does not have any branch, subsidiary, affiliate, representative office, joint venture, controlled company or other corporate presence in Russia.

The company is not directly or indirectly owned or controlled by any Russian individual or legal entity.



4. Whether the remitter has any connection with SEA RIVER SERVICE

No.

SEA RIVER PRODUTOS NAUTICOS LTDA has no direct or indirect corporate, ownership, control, management, commercial, contractual, financial, operational or other relationship with:

- SEA RIVER SERVICE LIMITED LIABILITY COMPANY;
- SEA RIVER SERVICE LLC;
- any other similarly named Russian entity.

For the avoidance of doubt, the Brazilian remitter **SEA RIVER PRODUTOS NAUTICOS LTDA, CNPJ 82.322.348/0001-60**, is an entirely independent Brazilian company and is not, and has never been, part of the same corporate or economic group as SEA RIVER SERVICE.

There is no common ownership, management, control, financing, payment flow, commercial relationship or operational connection between the companies. Any similarity between their names is purely coincidental.

5. Whether the remitter or the transaction involves a sanctioned jurisdiction, entity, individual or activity

No.

Based on our corporate and transaction records and to the best of our knowledge, neither SEA RIVER PRODUTOS NAUTICOS LTDA nor the transaction under review directly or indirectly involves any sanctioned jurisdiction, sanctioned entity, sanctioned individual or prohibited activity.

The payment is a regular commercial payment to **QINGDAO BETTER AND BETTER ROPE CO., LTD.** relating to the purchase and importation of **ROPES**, supported by Commercial Invoice No. BABSEA-260709-135-XQ, dated **july, 9 of 2026**.

The payment is not being made on behalf of, or for the benefit of, SEA RIVER SERVICE or any other sanctioned individual or entity.



The transaction has no connection with Russia, SEA RIVER SERVICE, MORE REKA SERVIS or any sanctioned party, intermediary or prohibited activity.

We hereby confirm that the information provided above is true and accurate to the best of our knowledge and according to the company's current corporate and transaction records.

We remain available to provide any additional information or supporting documentation that may be required.

REPÚBLICA FEDERATIVA DO BRASIL			
CADASTRO NACIONAL DA PESSOA JURÍDICA			
NUMERO DE INSCRIÇÃO 82.322.348/0001-60 MATRIZ	COMPROVANTE DE INSCRIÇÃO E DE SITUAÇÃO CADASTRAL		DATA DE ABERTURA 08/11/1990
NOME EMPRESARIAL SEA RIVER PRODUTOS NAUTICOS LTDA			
TÍTULO DO ESTABELECIMENTO (NOME DE FANTASIA) SEA RIVER			PORTE EPP
CÓDIGO E DESCRIÇÃO DA ATIVIDADE ECONÔMICA PRINCIPAL 32.92-2-02 - Fabricação de equipamentos e acessórios para segurança pessoal e profissional			
CÓDIGO E DESCRIÇÃO DAS ATIVIDADES ECONÔMICAS SECUNDÁRIAS 33.19-8-00 - Manutenção e reparação de equipamentos e produtos não especificados anteriormente 46.42-7-02 - Comércio atacadista de roupas e acessórios para uso profissional e de segurança do trabalho 46.69-9-99 - Comércio atacadista de outras máquinas e equipamentos não especificados anteriormente; partes e peças 46.93-1-00 - Comércio atacadista de mercadorias em geral, sem predominância de alimentos ou de insumos agropecuários 47.73-3-00 - Comércio varejista de artigos médicos e ortopédicos			
CÓDIGO E DESCRIÇÃO DA NATUREZA JURÍDICA 206-2 - Sociedade Empresária Limitada			
LOGRADOURO AV JUSCELINO KUBITSCHKE DE OLIVEIRA	NUMERO 651	COMPLEMENTO *****	
CEP 81.280-140	BAIRRO/DISTRITO CIDADE INDUSTRIAL	MUNICÍPIO CURITIBA	UF PR
ENDEREÇO ELETRÔNICO ROSAMARIA@SEARIVER.COM.BR		TELEFONE (41) 3071-0130 / (41) 9860-9930	
ENTE FEDERATIVO RESPONSÁVEL (EFR) *****			
SITUAÇÃO CADASTRAL ATIVA		DATA DA SITUAÇÃO CADASTRAL 10/09/2005	
MOTIVO DE SITUAÇÃO CADASTRAL			
SITUAÇÃO ESPECIAL *****		DATA DA SITUAÇÃO ESPECIAL *****	

Aprovado pela Instrução Normativa RFB nº 2.119, de 06 de dezembro de 2022.

Emitido no dia 16/07/2026 às 16:39:07 (data e hora de Brasília).

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Rosa Maria de Lima Simioni

Founder and CEO

Sea River Produtos Nauticos Ltda.

