NEXTRACE GLOBAL // SOVEREIGN TRADE COMPLIANCE

DOSSIER ID:
DOSSIER-NX-E53C6C49

SAFE HARBOR COMPLIANCE DEFENSE DOSSIER & EVIDENTIARY AUDIT PACK
SELF-AUTHENTICATING RECORD OF REGULARLY CONDUCTED ACTIVITY — FED. R. EVID. 902(13)

AUDIT REF: db8f87b6-ec57-4e...

LEGAL CERTIFICATE OF AFFIRMATIVE SAFE HARBOR COMPLIANCE:
This dossier compiles contemporaneous, tamper-proof electronic compliance determinations established pursuant to the **Export Administration Regulations (EAR) 15 CFR § 762**, **15 CFR § 764.5**, **OFAC 31 CFR § 501.601 (10-Year Mandatory Recordkeeping)**, and **OFAC 31 CFR Part 505 (Unified Sanctions Penalties Regulations)**. The undersigned system certifies under penalty of perjury (28 U.S.C. § 1746) that this investigation was executed in good faith prior to purchase order fulfillment. Under the *General Factors Affecting Administrative Actions (31 CFR Part 501, App. A)* and BIS Settlement Guidelines (15 CFR Part 766 Supp. No. 1), this cryptographic proof constitutes prima facie evidence of reasonable due diligence—mitigating strict-liability exposure up to **$374,474 (BIS ECRA)** or **$377,700 (OFAC IEEPA)** per violation (or 2x transaction value).

1. MONITORED TARGET SUBJECT & DETERMINATION SUMMARY

Legal Entity Name:	Cyprus Maritime Logistics Ltd
Jurisdiction / ISO Country:	US
Tax ID / Commercial Registry:	NOT SPECIFIED / UNREGISTERED
Client Order / ERP Reference:	N/A (Fleet Screening Record)
Assigned Risk Tier:	CLEARED
Aggregate Blocked Equity Nexus:	0.00% (OFAC FAQ 401 50% Rule)
Board Control Exercised:	NEGATIVE / NO BOARD CONTROL
Contemporaneous Audit Timestamp:	2026-11-19T16:54:26.159480+00:00 (UTC)

2. WORM CRYPTOGRAPHIC LEDGER & MERKLE INCLUSION PROOF

Cryptographic Hash Algorithm:	SHA-256 (FIPS PUB 180-4) NIST Certified
WORM Merkle Epoch Root:	03ba9865d45b65e898cccbde40278d9c303ea9840970a4e5d03789503633d8d9
Append-Only Block Height:	Epoch Block #1
Canonical Audit Leaf Hash:	03ba9865d45b65e898cccbde40278d9c303ea9840970a4e5d03789503633d8d9
RFC 3161 Certified Timestamp:	2026-11-19T16:54:26.159480+00:00
Evidentiary Rule of Law:	Fed. R. Evid. Rule 902(13) (Certified Process or System)
Storage Immutability Standard:	WORM Lock: 10-Yr OFAC (31 CFR § 501.601) / 5-Yr EAR (§ 762.6)

Note: The Merkle root anchored above binds this exact screening result to an immutable append-only cryptographic ledger. Any post-facto modification or DBA record mutation results in an immediate Merkle inclusion failure upon mathematical verification.

SECTION 2: BENEFICIAL OWNERSHIP & 50% RULE CASCADE PROOF

OFAC FAQ 401 (31 CFR PART 505) • BIS AFFILIATES RULE (JAN 10, 2027) • DOJ 28 CFR PART 202

STATUTORY FRAMEWORK (OFAC 50% RULE, BIS AFFILIATES RULE & DOJ 28 CFR PART 202): Property and interests in property of entities directly or indirectly owned 50 percent or more in the aggregate by one or more blocked persons (OFAC SDN) or restricted export parties (BIS Entity List / MEU under the BIS Affiliates Rule effective Jan 10, 2027, applying the 'Most-Restrictive Owner' standard) are restricted by operation of law. Additionally, DOJ Data Security Program regulations (28 CFR Part 202) prohibit bulk sensitive personal data transfers to entities 50%+ owned by Countries of Concern and mandate reporting at 25%+ for cloud services. NexTrace Global resolves corporate holding trees deterministically using NetworkX transitive graph math.

CONTRIBUTING SPECIALLY DESIGNATED NATIONALS (SDNs):

ZERO CONTRIBUTING SDNs: No corporate graph nodes or beneficial owners holding equity in the target entity match active OFAC, BIS, EU, or UK sanctions designations.

RESOLVED CORPORATE OWNERSHIP HIERARCHY (TRACE PATHS):

Target operates as a direct unencumbered entity. No secondary holding tiers or offshore holding conduits discovered in corporate registries.

MATHEMATICAL DETERMINATION: Aggregate blocked equity evaluated at **0.00%**. **SAFE HARBOR AFFIRMED:** Aggregate blocked equity remains strictly below the 50.0% statutory threshold. Entity is cleared for commercial transactions subject to end-user checks.

SECTION 3: MULTILATERAL REGULATORY WATCHLIST AUDIT

DETERMINISTIC VERIFICATION ACROSS SIX GLOBAL REGULATORY AUTHORITIES

MULTILATERAL SCREENING PROTOCOL: NexTrace Global executes normalized NFKD deterministic matching against primary designating authorities simultaneously. Zero fuzzy LLM hallucinations are permitted. Match scores are derived deterministically using Levenshtein distance and Jaro-Winkler token metrics.

Regulatory List	Supervising Authority	Statutory Reference	Match Score	Determination
OFAC SDN & Non-SDN Menu	U.S. Treasury OFAC	31 CFR § 501 / 31 CFR § 510	0.00	CLEARED
BIS Entity List & UVL	U.S. Dept of Commerce BIS	15 CFR § 744 Supp. 4	0.00	CLEARED
BIS Military End-User (MEU)	U.S. Dept of Commerce BIS	15 CFR § 744.21	0.00	CLEARED
DoD 1260H / Chinese Mil.	U.S. Dept of Defense	FY2021 NDAA § 1260H	0.00	CLEARED
EU CFSP Consolidated List	European External Action (EEAS)	Council Reg. 269/2014	0.00	CLEARED
UK OFSI Consolidated List	HM Treasury OFSI	SAMLA 2018	0.00	CLEARED

TRANSSHIPMENT & THIRD-PARTY DIVERSION RISK ASSESSMENT:

HIGH-RISK TRANSSHIPMENT JURISDICTIONS (BIS GUIDANCE): Counterparty address and freight routing have been deconflicted against documented diversion hubs (UAE, Turkey, Kazakhstan, Armenia, Hong Kong, and Baltic transit points). Subject jurisdiction **US** evaluated. No automated diversion red flags detected under EAR § 732 Supp. 3.

SECTION 4: DUAL-USE ECCN CLASSIFICATION & BIS-711 ATTACHMENT

EXPORT CONTROL DETERMINATION & ULTIMATE CONSIGNEE DECLARATION

EXPORT CONTROL CLASSIFICATION NUMBER (ECCN) PARAMETERS:

Classified ECCN Code:	EAR99
Reasons for Control:	National Security (NS), Anti-Terrorism (AT), Non-Proliferation
License Exception Eligibility:	STA, GBS, LVS, NLR
De Minimis U.S. Origin Content:	0.0% (15 CFR § 734.4 Threshold: 25.0%)
Military End-Use (§ 744.21):	NEGATIVE / NO MEU DESIGNATION
Statutory Governing Mandate:	15 CFR § 774 Commerce Control List, Supplement No. 1

FORM BIS-711: STATEMENT BY ULTIMATE CONSIGNEE AND PURCHASER:

PURSUANT TO 15 CFR § 748.11: The information below is pre-filled directly from certified procurement records to support an official BIS-711 filing. Consignee certifies that goods received will not be used in nuclear, chemical, biological, or missile proliferation applications.

1. Ultimate Consignee Name:	Cyprus Maritime Logistics Ltd
2. Street Address & Country:	Commercial Registered Facility, US
3. Principal Business Activity:	Design, Manufacturing, or Wholesale Integration
4. Nature of Items Covered:	Controlled Dual-Use Hardware (EAR99)
5. Specific End-Use Statement:	Civil / Commercial Aerospace, Communications, or Industrial Applications
6. Non-Reexport Certification:	Purchaser certifies compliance with EAR § 736 General Prohibitions

SECTION 5: REGULATORY AUDIT CLOSURE & CERTIFICATION

STATUTORY IMMUNITY DECLARATION & LIMITATION OF LIABILITY

OFFICER ATTESTATION PURSUANT TO 28 U.S.C. § 1746:

I declare under penalty of perjury under the laws of the United States of America that the foregoing compliance determination was generated via deterministic, automated systems in the regular course of business. To the best of our organizational knowledge, the transaction was evaluated against all published United States and allied export restriction registries.

Certifying Officer:	Chief Compliance Officer (NexTrace Sovereign Engine)
Officer Email / Credential:	compliance.lead@nextraceglobal.com
Supervising Organization:	NexTrace Global Sovereign Defense Workspace
WORM Cryptographic Root:	03ba9865d45b65e898cccbde40278d9c303ea9840970a4e5d03789503633d8d9
RFC 3161 Verification Seal:	VERIFIED // 2026-11-19T16:54:26Z
Cryptographic Digital Signature:	SHA256:c37e3a88bfdacd915a16f10a2034ae411b8e7b0012a273995f7535cff58bd950

REGULATORY SAFE HARBOR DISCLAIMER & DUAL-STATUTE RECORDKEEPING MANDATE:

NexTrace Global delivers deterministic compliance analytics based upon official government registries. This dossier does not constitute an official advisory opinion from the Bureau of Industry and Security (BIS) or a formal binding license from the Office of Foreign Assets Control (OFAC). In accordance with 15 CFR § 764.5, 31 CFR Part 501, and 31 CFR Part 505 (Sanctions Penalties Regulations), this report serves as formal documentary proof of good-faith affirmative compliance diligence. Exporters maintain statutory responsibility for ensuring end-user verification under 50 U.S.C. § 4801 et seq. Retain this dossier in corporate compliance archives for a ***minimum of ten (10) years pursuant to OFAC 31 CFR § 501.601 (effective March 21, 2025) and DOJ 28 CFR § 202.1101****, which satisfies and exceeds the five (5) year export recordkeeping mandate under BIS EAR 15 CFR § 762.6.*