LORI INTERNATIONAL

Registered legal name: Lori International, Inc. — Florida Profit Corporation

GLOBAL TRADE, ENERGY, MARITIME TRANSPORT AND LOGISTICS

COMPLIANCE PLAN MANUAL

CORPORATE REGULATORY COMPLIANCE AND BUSINESS ETHICS PROGRAM

OFAC Sanctions, Export Controls, Anti-Money Laundering, Anti-Corruption, and Commercial Due Diligence

DOCUMENT NO.	LORI-CMP-001
VERSION	3.0 — Expansion of Business Lines
ISSUE DATE	July 2026
NEXT SCHEDULED REVIEW	July 2027, or sooner in the event of significant legal changes
CLASSIFICATION	Confidential — Internal Use
DOCUMENT OWNER	Compliance Office

ISSUANCE APPROVAL

This signature certifies administrative approval of the issuance of this version of the document. Substantive certification of its content, responsibilities, and effective term is set out in Chapter 20 (Plan Approval, Certification and Effective Term).

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Richard González
Chief Executive Officer (CEO)
Lori International, Inc.
Date: ______ / ______ / ____________

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Compliance Officer
Lori International, Inc.
Date: ______ / ______ / ____________

LORI INTERNATIONAL — COMPLIANCE PLAN MANUAL

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CHAPTER 1

Message from Leadership and Corporate Commitment (Tone from the Top)

To all personnel, officers, contractors, suppliers, business partners, and other stakeholders of Lori International, Inc., doing business as “Lori Internacional” (hereinafter, “the Company”):

At Lori Internacional we understand that our integrity is our most valuable asset. In a complex and constantly evolving operating environment, transparency, ethics, and strict compliance with applicable legal regulations are not merely business requirements: they are the foundation on which we build trust with our customers, suppliers, and business partners.

The Leadership of Lori Internacional expresses its unwavering commitment to full compliance with applicable laws, including the economic sanctions administered by the Office of Foreign Assets Control (OFAC), United States export controls, the prevention of money laundering, and the fight against corruption. This commitment begins at the senior management level and is a shared responsibility that must permeate every level of our organization.

1.1. Statement of Commitment

1.1.1 Non-negotiable integrity. Our policy is clear: integrity is non-negotiable. The Company will not seek shortcuts that compromise its reputation or the legality of its operations, regardless of commercial pressure or the urgency of a business opportunity.

1.1.2 Duties of every member of the organization. Every member of this organization, without exception, has the duty to: act with honesty and transparency in all commercial, administrative, and logistical transactions; know and abide by the internal compliance policies detailed in this Manual; and report any situation that may represent a compliance risk to the Company.

1.1.3 Allocation of resources. Leadership commits to providing the Compliance Office with the human, technological, and budgetary resources reasonably necessary for the effective execution of this Manual.

1.1.4 Duty to report and non-retaliation. Leadership guarantees the existence of a confidential reporting channel (Chapter 14) and formally commits that no employee, officer, or collaborator will suffer any retaliation for reporting, in good faith, a concern or suspicion of non-compliance.

1.2. The Roadmap

This Compliance Plan Manual is the roadmap that guides our actions. We expect every member of Lori Internacional to embrace this commitment with the same rigor and seriousness as Leadership. Together, we will ensure the sustainability and ethical success of our activities over the long term.

Richard González

Chief Executive Officer (CEO)

Lori International, Inc.

CHAPTER 2

Introduction, Purpose, and Scope of the Manual

2.1. Introduction

This Compliance Plan Manual has been prepared by Lori Internacional for the purpose of establishing, documenting, and systematizing the comprehensive framework of policies, procedures, internal controls, and oversight mechanisms that govern the Company's activities. This document reflects the organization's commitment to operational transparency and strict adherence to the compliance regulations applicable to its commercial, logistical, and administrative service activities.

This Manual functions as the governing instrument of Lori Internacional's Compliance Program, integrating internationally recognized standards in the field — in particular, the guidelines of the Financial Action Task Force (FATF) on the prevention of money laundering, and the framework of essential sanctions-compliance components published by the U.S. Office of Foreign Assets Control (OFAC) — adapted specifically to the nature and scope of the Company's operations.

2.2. Purpose

This Manual is intended to:

- Institutionalize a formal corporate compliance policy applicable to the entirety of the Company's operations.
- Define the organizational structure, roles, and responsibilities within the Compliance Program.
- Document the legal and regulatory basis for Lori Internacional's activities, including its status as a U.S. person subject to OFAC sanctions and U.S. export controls.
- Implement due diligence procedures (KYC/KYCC) for the secure management of customers, suppliers, counterparties, and agents abroad.
- Establish monitoring, audit, whistleblower-channel, and training mechanisms that guarantee the effectiveness and continuity of the Program.

2.3. Scope

2.3.1 Personal scope. This Manual is mandatory for all officers, employees, independent contractors, agents, representatives, and consultants of Lori Internacional, as well as for any third party acting on behalf of, or providing services to, the Company.

2.3.2 Material scope. The Manual governs Lori Internacional's commercial activities relating to: (i) administrative management and bookkeeping; (ii) support logistics; (iii) registration and representation processes before public and private entities; and (iv) the other business lines identified in Chapter 5.

2.3.3 Operational autonomy and related entities. It is hereby stated that Lori Internacional constitutes an independent operating entity with its own legal personality. The policies and procedures contained in this Manual are for the exclusive use of this Company's activities and are not extendable to, nor do they substitute, the policies of other business entities with which Leadership or its shareholders may have a corporate, common-management, or shared-domicile relationship. Section 4.4 of this Manual develops the procedure for identifying and managing conflicts of interest arising from such relationships.

2.3.4 Temporal scope. This Manual takes effect on the date indicated on the Cover Page and shall remain in force until its review, update, or formal replacement in accordance with the procedure set out in Chapter 18.

2.4. Interpretation

In the event of any doubt regarding the interpretation of the scope or application of the provisions of this Manual, Lori Internacional's Compliance Office shall be the competent body to issue the corresponding interpretive criterion, always favoring the most conservative standard that best protects regulatory compliance.

CHAPTER 3

Legal and Regulatory Framework and Operational Basis

This chapter precisely identifies the Company's jurisdiction of incorporation and the specific legal framework applicable to it, moving beyond a generic reference to “national laws,” so that this Manual constitutes a verifiable instrument before banks, counterparties, and authorities.

3.1. Jurisdictional Identification and Registration Data

Lori Internacional operates through the legal entity Lori International, Inc., a company incorporated under the laws of the State of Florida, United States of America (Florida Profit Corporation), whose registration data with the Florida Department of State, Division of Corporations, is as follows:

Field	Data
Registered legal name	LORI INTERNATIONAL, INC.
Corporate type	Florida Profit Corporation
Document Number	P22000025803
Federal Employer Identification Number (FEI/EIN)	92-0866945
Date Filed	04/05/2022
Company status	ACTIVE
Principal and mailing address	11231 NW 20th St, Ste 140-337, Miami, FL 33172

3.1.1 U.S.-person status. As a company incorporated under the laws of a U.S. state, Lori Internacional is, for all purposes, a “U.S. Person” under U.S. sanctions and export-control legislation, and is therefore subject to compliance with such regulations across the entirety of its operations, regardless of the country in which they are materially carried out.

3.1.2 Maintenance of good corporate standing. The Compliance Office, in coordination with the administrative area, will verify annually that Lori International, Inc. maintains its “ACTIVE” status with the Florida Division of Corporations, including the timely filing of the Annual Report required by section 607.1622 of the Florida Statutes, in order to prevent the administrative dissolution of the company.

3.2. U.S. Federal Legal Framework

Given its status as a U.S. company, Lori Internacional's Compliance Program is primarily grounded in the following federal legal framework:

3.2.1 Economic sanctions (OFAC/IEEPA). Compliance with the economic sanctions programs administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), issued pursuant to the International Emergency Economic Powers Act (IEEPA) and the corresponding Executive Orders. No employee, agent, or counterparty of Lori Internacional may involve the Company in a transaction with a blocked person (SDN) or with a country subject to a comprehensive U.S. embargo, absent express OFAC authorization.

3.2.2 Export controls (EAR/BIS). Compliance with the Export Administration Regulations (EAR), administered by the U.S. Department of Commerce's Bureau of Industry and Security (BIS), applicable to the export, re-export, and transfer of the industrial, technical, and medical supplies that constitute one of the Company's areas of exposure under Chapter 5.

3.2.3 Foreign Corrupt Practices Act (FCPA). Compliance with the Foreign Corrupt Practices Act (FCPA), which prohibits offering, promising, or giving anything of value to a foreign public official for the purpose of obtaining or retaining business, regardless of whether the conduct occurs within or outside U.S. territory.

3.2.4 Anti-money-laundering (BSA/USA PATRIOT Act). Adoption, as a corporate best practice, of the principles of the Bank Secrecy Act and Title III of the USA PATRIOT Act regarding customer identification and suspicious-activity reporting, notwithstanding that Lori Internacional is not formally a “financial institution” covered by that regime.

3.2.5 Beneficial-ownership transparency (Corporate Transparency Act). Compliance with the Corporate Transparency Act and its Beneficial Ownership Information (BOI) rule issued by the Financial Crimes Enforcement Network (FinCEN), in accordance with the reporting procedure described in section 12.6 of this Manual.

3.3. State (Florida) Legal Framework

3.3.1 Florida corporate law. Compliance with the Florida Business Corporation Act (Chapter 607 of the Florida Statutes), including the obligations to maintain a registered agent, file annual reports, and keep corporate information updated with the Division of Corporations (Sunbiz.org).

3.3.2 Data protection and data-breach notification. Compliance with the Florida Information Protection Act (FIPA), which requires timely notification to the owners of personal data and, where applicable, to the Florida Attorney General, in the event of a security breach compromising personally identifiable information in the Company's possession, in accordance with the data-protection policy in section 6.5.

3.4. International Due-Diligence Standards

In addition to the federal and state framework described above, Lori Internacional adopts international best practices for the prevention of money laundering and the financing of unlawful activity, based on the guidelines of the Financial Action Task Force (FATF), to the extent relevant to its counterparties and agents abroad.

3.5. Operational Basis

Lori Internacional's operational legitimacy rests on the correct execution of its administrative and logistical processes. To ensure this basis, the Company commits to:

3.5.1 Proper documentation. Keeping all of the company's legal records up to date, including the certificate of incorporation, corporate minutes, annual reports filed with Sunbiz.org, and federal and state tax documentation, ensuring their availability for any audit or request from a competent authority.

3.5.2 Data transparency. Ensuring the accuracy and currency of corporate information, both on Sunbiz.org and in private records, avoiding any inconsistency that could compromise the entity's reputation or lead to its administrative dissolution.

3.5.3 Regulatory monitoring. The Compliance Office will maintain active oversight of any change in federal, state, or international legislation that could affect Lori Internacional's operations, immediately updating internal protocols when necessary, in accordance with Chapter 18.

3.6. Applicability and Dynamic Nature

The legal framework described herein is not static: it is subject to continuous review to ensure that Lori Internacional not only complies with the law today but proactively adapts to changes in the national and international regulatory environment, thereby mitigating any risk of legal, administrative, or reputational exposure for the Company and its representatives.

3.7. Note on Sector-Specific Licenses

It is hereby noted that this Manual governs Lori Internacional's general Compliance Program but does not, by itself, constitute the legal basis authorizing a specific operation in a sector subject to particular OFAC licensing requirements. In particular, no provision of this Manual should be interpreted as a blanket authorization to conduct operations involving oil or petrochemical products of Venezuelan origin, or any other jurisdiction subject to comprehensive U.S. sanctions. Any operation of that nature requires the prior, documented, case-by-case determination of the OFAC general or specific license that covers it — analogous to the analysis developed for OFAC General License 46C within the framework of other entities in the sector — in accordance with the procedure in section 5.7 of this Manual.

CHAPTER 4

Organizational Structure of the Compliance Program

4.1. Corporate Governance Philosophy

Lori Internacional's organizational structure is designed to ensure accountability, segregation of duties, and informed decision-making. The Compliance Program does not depend on external agents for its day-to-day operation; rather, it is embedded within the Company's own hierarchical structure, without prejudice to the independence of the audit function described in section 4.5.

4.2. Levels of Responsibility

4.2.1 Executive Leadership (CEO). Bears ultimate responsibility for institutional support of the Compliance Program. Their role is to ensure that the resources necessary for compliance are available and to foster a culture of ethics throughout the organization.

4.2.2 Compliance Office. The body responsible for the implementation, oversight, and ongoing updating of this Manual. Its functions include monitoring compliance with internal policies and legal regulations, managing the whistleblower channel and coordinating internal investigations, and advising Executive Leadership on the management of reputational and legal risks.

4.2.3 Administrative and Operations Area. Responsible for the day-to-day execution of due-diligence processes. It constitutes the first filter in the verification of counterparties and suppliers, ensuring that every operation complies with the protocols established in this Manual.

4.2.4 Personnel and collaborators. All Company personnel, regardless of hierarchical level, are obligated to know the content of this Manual and to report any deviation or possible irregularity to the Compliance Office.

4.3. Compliance Committee

4.3.1 Composition. The Compliance Committee shall be composed, at minimum, of the CEO and the Compliance Officer, and may incorporate external legal counsel on a permanent or ad hoc basis when the complexity of an operation so requires.

4.3.2 Frequency and functions. The Committee shall meet quarterly, and on an extraordinary basis in the event of critical findings, to: (i) review the current risk assessment (Chapter 7); (ii) decide on high-risk operations or counterparties escalated under Chapter 8; (iii) review the status of the reporting obligations of Chapter 12; and (iv) decide on updates to this Manual pursuant to Chapter 18. The existence of this Committee ensures that higher-risk decisions do not depend on a single individual.

4.4. Identification and Management of Conflicts of Interest with Related Entities

Lori Internacional recognizes that its Leadership, shareholders, or corporate domicile may coincide with, or be related to, those of other distinct legal entities. To protect the integrity of its business decisions, the Company establishes:

4.4.1 Duty to disclose. Any officer, employee, or shareholder holding a control or management position in another legal entity that is, or may become, a customer, supplier, or counterparty of Lori Internacional must formally disclose this to the Compliance Office before the corresponding transaction is finalized.

4.4.2 Independent evaluation of the transaction. Any transaction between Lori Internacional and a related entity under the preceding paragraph must be evaluated under the same due-diligence standards, reasonable commercial terms, and documentation required for any independent third party, without exception or preferential treatment, and must have the express approval of the Compliance Committee.

4.4.3 Prohibition on structuring between related entities. Lori Internacional is expressly prohibited from executing, on its own behalf, a transaction that another related entity could not execute directly because it lacks the required license, authorization, or specific legal basis (including, without limitation, general or specific OFAC licenses applicable to the oil sector). Any overlap in business line between Lori Internacional and a related entity — in particular, regarding parts, additives, and supplies for the oil sector under section 5.5 — must be documented before the Compliance Committee, which will verify that each entity operates under its own independent legal basis and that there is no purpose of evading, diluting, or circumventing the limits of a license or authorization applicable to the other.

4.4.4 Register of related parties. The Compliance Office will maintain an up-to-date register of the legal entities related to Lori Internacional's Leadership or shareholders, to facilitate the timely identification of potential conflicts of interest in future transactions.

4.5. Segregation of Duties and Audit Independence

To avoid conflicts of interest and ensure the integrity of controls, Lori Internacional establishes a clear separation between commercial execution functions (sales and logistics), control and oversight functions (Compliance Office), and the audit function. No individual or office may hold total control over a critical process — for example, approving a supplier and executing the corresponding payment — without proper cross-review or authorization.

In particular, and in order to remedy any risk of self-review, the internal audit function described in Chapter 13 shall be performed by a person or body other than the one who manages the day-to-day administration of the Compliance Program, and may fall to an officer not involved in the audited operations or, preferably, to an independent certified public accountant or external advisor, in accordance with the procedure in section 13.3.

CHAPTER 5

Authorized Products, Services, and Operations (Areas of Exposure)

5.1. Nature of Operations

Lori Internacional carries out its activities under a multifaceted global-trade model. The Company acts as a logistics and commercial facilitator, managing the supply, procurement, transport, and intermediation of a wide range of goods and services aimed at meeting the demands of domestic and international markets. As of this Version 3.0, the Company formally expands its operational purpose to incorporate international maritime transport, energy trading, large-scale food supply, and the supply of spare parts and additives for the oil sector, as detailed in the following sections.

5.2. Areas of Commercial Exposure

The Company is authorized to manage operations related to, but not limited to, the following sectors:

Sector	Description of Activity	Risk
Industrial Supplies and Inputs	Procurement and management of spare parts, machinery, equipment, and technical components required for third parties' operations.	Medium
Consumer Goods	Marketing and logistics of finished goods and mass-consumption products, complying with applicable quality standards and health regulations.	Low
Medical Supplies and Equipment	Management and distribution of hospital supplies and health products, under strict handling protocols, origin certifications, and quality control.	Medium
Administrative and Logistics Services	Advisory services for corporate registration processes, customs documentation management, and administrative support for companies in expansion or operational consolidation.	Low
International Maritime Transport	Chartering and coordination of cargo transport via ships and shipping lines worldwide, including procurement of marine insurance and port services.	High
Energy Trading	Intermediation, purchase and sale, and logistics of energy products internationally, including hydrocarbons and their derivatives, subject to the suspensive condition in section 5.7.	High
Large-Scale Food Supply	Purchase, sale, and logistics of food and food-related supplies for corporate, governmental, or institutional customers, subject to the suspensive condition in section 5.7 when the counterparty is a government or state entity.	High
Spare Parts, Additives, and Supplies for the Oil Sector	Marketing of spare parts, specialized additives, and technical supplies for the oil industry, subject to the suspensive condition in section 5.7.	High

5.3. Supply-Chain Integrity Policy

Given the breadth of its corporate purpose, Lori Internacional applies a "Due Diligence by Type of Good" methodology. Before adding a new product line or beginning operations in a different sector, the Compliance Office must:

5.3.1 Validate legality. Confirm that the marketing of the good in question does not violate any applicable regulation.

5.3.2 Verify suppliers. Ensure that manufacturers or distributors hold the certifications and permits necessary to operate in their respective jurisdictions.

5.3.3 Analyze specific risk. Assess whether the new sector or product presents particular (reputational, security, or regulatory) risks and establish the corresponding mitigation measures, in accordance with the methodology of Chapter 7.

5.4. Export Controls and Dual-Use Goods

Because the industrial supplies, technical components, medical supplies, energy, and oil-sector spare-parts business lines may involve goods subject to the Export Administration Regulations (EAR) — including, in certain cases, "dual-use" (civil and military) goods — the Company applies the following additional controls:

5.4.1 Export Control Classification (ECCN). Before exporting or re-exporting a technical or industrial good, the commercial area, with the support of the Compliance Office, will determine whether that good has an Export Control Classification Number (ECCN) under the EAR, or whether it qualifies as "EAR99" (a low-sensitivity, unlisted good).

5.4.2 Screening against restricted-trade lists. Every counterparty, end recipient, and destination country of an export will be screened against the U.S. Department of Commerce's trade-restriction lists, including the Entity List, the Denied Persons List, and the Unverified List administered by the Bureau of Industry and Security (BIS), in addition to the sanctions lists described in section 9.3.1.

5.4.3 End-use statement. For goods of greater technical sensitivity, the Compliance Office may require the buyer to provide an end-use statement confirming that the good will not be put to military, nuclear, or weapons-proliferation use, nor redirected to an unauthorized recipient or country.

5.5. International Maritime Transport

The incorporation of international maritime transport as a business line requires the application of the enhanced maritime-counterparty due-diligence protocol developed in section 9.6 of this Manual — vessel identification, ownership chain, P&I coverage, AIS history, and port-call history — prior to entering into any charter agreement, without exception.

5.6. Spare Parts, Additives, and Supplies for the Oil Sector

Lori Internacional may market spare parts, specialized additives, and technical supplies for the oil industry. This business line overlaps, in its sector-specific nature, with the activity of other entities related to the Company's Leadership (section 4.4). Accordingly, and without prejudice to this Manual's general controls, any transaction under this business line will be subject to the suspensive condition developed in section 5.7.

5.7. Suspensive Condition: Energy, Oil, and Government Food-Supply Operations with a Nexus to Sanctioned Jurisdictions

In order to protect the Company against the risk of economic sanctions and improper structuring between related entities, no energy-trading transaction (section 5.2), oil spare-parts/additives transaction (section 5.6), or food-supply transaction to a government, state entity, or state-owned enterprise (section 5.2), may be executed without prior compliance with the following conditions:

5.7.1 Determination of nexus to a sanctioned jurisdiction. The Compliance Office will determine, prior to accepting the transaction, whether it directly or indirectly involves Venezuela, Cuba, Iran, North Korea, Russia, or any other jurisdiction subject to comprehensive or sectoral OFAC sanctions, or blocked persons under section 9.3.1.

5.7.2 Determination of specific legal basis. If such a nexus exists, the transaction may not be executed unless the Compliance Office identifies and documents, in writing, the general or specific OFAC license, or any other applicable legal authorization, that covers the specific transaction, following a methodology equivalent to that developed for OFAC General License 46C in the oil sector.

5.7.3 Compliance Committee approval. No transaction covered by this section may be executed without the express, documented approval of the Compliance Committee (section 4.3), which will additionally assess whether the transaction overlaps with the activity of a related entity and, if so, will apply the procedure in clause 4.4.3.

5.7.4 Absence of a sanctioned nexus. When the Compliance Office determines that the transaction does not involve any sanctioned jurisdiction or person, it may be processed under this Manual's ordinary due-diligence procedures, with a written record of that determination.

This suspensive condition is mandatory and non-delegable, and its breach shall constitute a very serious offense under Chapter 16.

5.8. Operational Flexibility

Lori Internacional retains the authority to expand or restrict its areas of operation as determined by Executive Leadership, always within the legal framework defined in Chapter 3 and under the oversight of the Compliance Office. This flexibility is an essential component of the Company's competitive capacity in the global market, without this implying, under any circumstances, a relaxation of the due-diligence standards, export controls, or the suspensive condition in section 5.7.

CHAPTER 6

General Policy and Compliance Commitment

6.1. Statement of Principles

Lori Internacional's policy is one of zero tolerance for any illegal or unethical practice, or any practice that contravenes international economic sanctions regulations. The Company's compliance commitment is based on integrity, transparency, and strict adherence to the laws of every jurisdiction in which it operates.

6.2. Policy Against Unlawful Practices

The Company strictly prohibits all of its employees, contractors, and business partners from engaging in:

6.2.1 Money laundering and financing of unlawful activity. Any attempt to conceal the origin of funds or assets.

6.2.2 Corruption and bribery. It is prohibited to offer, promise, give, or accept any improper benefit to obtain or retain business, or to obtain any unfair advantage, in accordance with the Foreign Corrupt Practices Act referenced in section 3.2.3.

6.2.3 Evasion of sanctions and export controls. It is prohibited to circumvent, directly or indirectly, any international sanctions regime or export-control regime applicable to the Company's operations.

6.3. Commitment to Transparency

Every member of Lori Internacional must:

- **Keep accurate records:** Record every transaction accurately, completely, and promptly in the Company's books and accounting records.
- **Communicate openly:** Immediately inform the Compliance Office of any doubt or suspicion regarding an activity that is not aligned with this commitment.

- **Maintain professional conduct:** Represent the Company with high standards of professional ethics, avoiding any situation that could give rise to an undisclosed conflict of interest under section 4.4.

6.4. Compliance Culture

The compliance commitment is not a static document but a culture that Executive Leadership actively fosters. The Company ensures that this commitment is communicated and understood at every level, reinforcing the idea that commercial success must never take precedence over the organization's integrity.

6.5. Protection of Personal Data

In the course of its operations, Lori Internacional collects and processes personal information of customers, suppliers, and collaborators. The Company commits to:

6.5.1 Minimization and purpose limitation. Collecting only the personal data necessary for the stated commercial, administrative, or due-diligence purpose, and not using it for other purposes without corresponding consent.

6.5.2 Information security. Implementing reasonable technical and organizational measures to protect personal data in its custody against unauthorized access, loss, or improper disclosure, in accordance with the digital controls described in section 8.3.

6.5.3 Notification of security breaches. In the event of a security breach compromising personally identifiable information, the Compliance Office will assess the applicable notification obligation under the Florida Information Protection Act (section 3.3.2) and, where applicable, will promptly notify data owners and the competent authorities.

CHAPTER 7

Risk Assessment (Methodology and Identification of Risk Factors)

7.1. Assessment Methodology

Lori Internacional adopts a risk-assessment methodology based on the “Inherent and Residual Risk” approach. This is a dynamic process that is updated periodically to ensure the Company's defenses against legal, reputational, and operational risks remain effective. The process follows three steps:

7.1.1 Identification. Detection of possible threats within the Company's commercial operations.

7.1.2 Analysis. Assessment of the likelihood of occurrence and the potential impact of each threat.

7.1.3 Mitigation. Implementation of controls to reduce risk to levels acceptable to the Company, in accordance with Chapter 8.

7.2. Identified Risk Factors

Risk Factor	Description
Counterparty Risk	The possibility that customers, suppliers, or agents abroad are involved in unlawful activities or subject to international sanctions.
Geographic Risk	Exposure arising from operating in, or trading with, jurisdictions subject to OFAC sanctions or complex or unstable regulatory environments.
Product/Service Risk	Complexity inherent to certain supplies (medical, technical, energy, oil-related, or dual-use) requiring rigorous certifications, export-control classification, and specialized handling.
Maritime Risk	Exposure arising from chartering vessels of unverified ownership or origin, flags of convenience, or routes involving sanctioned jurisdictions, in accordance with section 9.6.
Governmental Counterparty Risk	FCPA liability exposure (section 3.2.3) arising from food- or energy-supply contracts with governments or state-owned enterprises.
Related-Entity Risk	The possibility that a Lori Internacional transaction is interpreted as an unauthorized extension of the licensed activity of a related entity, in accordance with section 4.4.
Operational Risk	Possible failures in document management, accounting reports, or registration processes before public bodies that could result in administrative penalties or the dissolution of the company.

7.3. Risk Management in Practice

Executive Leadership, with the support of the Compliance Office, commits to:

- Conduct periodic reviews of the risk map.
- Adjust internal controls upon entry into new markets, products, or counterparties.
- Document all risk-management decisions, justifying the acceptance or mitigation of each identified factor.

7.4. Proactive Risk Management

At Lori Internacional, identifying a risk is not viewed as a barrier to doing business, but as a signal to establish appropriate controls. The Company's policy is proactive prevention, ensuring that every business opportunity passes through the assessment filter before being executed.

CHAPTER 8

Internal Mitigating Controls (Mitigation of Inherent Risk)

8.1. Objective of Internal Controls

Lori Internacional implements a set of internal controls designed to mitigate the inherent risks identified in Chapter 7. These controls operate preventively and detectively, ensuring that every stage of the Company's commercial operations is supervised and auditable.

8.2. Types of Controls

8.2.1 Hierarchical approval controls. Any transaction involving new suppliers, significant financial commitments, or expansion into new sectors must have the validation of Executive Leadership and the sign-off of the Compliance Office.

8.2.2 Segregation of duties (dual-process control). No transaction may be initiated, executed, and reconciled by the same person.

8.2.3 Cross-document verification. Before processing any purchase or service order, a cross-check of the documentation submitted (invoices, certifications, records) must be performed. Discrepancies must be resolved before proceeding.

8.2.4 Record-keeping and traceability. Every transaction must generate a complete documentary trail, including contracts, communications, proof of payment, and authorizations, stored in an organized manner to allow for immediate consultation.

8.3. Digital Controls

To optimize efficiency and reduce human risk, Lori Internacional relies on digital tools (management systems, accounting platforms, and document repositories) that restrict access to information according to each collaborator's level of responsibility, generate automatic alerts for transactions that fail to meet established parameters, and maintain a backup of documentation to ensure operational continuity and legal compliance.

8.4. Escalation Procedure and Timeframes

Every red flag identified by any employee must be escalated within the following maximum timeframes, so that the control system remains verifiable and auditable:

Step	Action	Maximum Timeframe
1	Identification and notification of the red flag to the Compliance Office	Immediate / same business day
2	Preliminary assessment and decision to suspend or continue the transaction	2 business days
3	Escalation to the Compliance Committee if the flag is high-risk	5 business days
4	Committee's final decision and communication to the commercial area	10 business days from identification

8.5. Continuous Improvement

The Compliance Office will assess the effectiveness of these controls at least every six (6) months. If a control proves insufficient or excessively bureaucratic, it will be adjusted to ensure that the mitigation system is both secure and efficient.

CHAPTER 9

Due Diligence — Know Your Customer / Know Your Counterparty (KYC / KYCC)

9.1. Definition and Scope

Due Diligence (KYC, Know Your Customer) is Lori Internacional's preventive pillar. It consists of the set of procedures necessary to identify, verify, and understand the customers, suppliers, agents, and business partners with whom the Company enters into relationships. This policy applies to all counterparties, without exception.

9.2. Levels of Due Diligence

9.2.1 Simplified diligence. For counterparties with a low risk profile, recurring transactions, or well-established companies. Focuses on validating basic identity and good-standing documents.

9.2.2 Standard diligence. Applicable to most commercial transactions. Includes collecting articles of incorporation, tax records, financial statements, and verification of business references.

9.2.3 Enhanced Due Diligence (EDD). Reserved for counterparties presenting elevated risks (for example, highly complex geographic locations, sensitive sectors, dual-use goods under section 5.4, or opaque corporate structures). Requires in-depth investigation, beneficial-owner analysis, and express approval from the Compliance Committee.

9.3. Verification Procedures

9.3.1 Screening against sanctions and restricted-trade lists. Every counterparty, and its beneficial owner(s), will be screened against: (i) OFAC's Specially Designated Nationals and Blocked Persons List (SDN List); (ii) OFAC's Sectoral Sanctions Identifications List (SSI List); (iii) the Entity List, the Denied Persons List, and the Unverified List maintained by the Bureau of Industry and Security (BIS); (iv) the United Nations Security Council Consolidated Sanctions List; and (v) the European Union Consolidated Sanctions List, when the counterparty operates in that jurisdiction.

9.3.2 Identification of the ultimate beneficial owner (UBO). Every natural person who holds, directly or indirectly, an interest equal to or greater than twenty-five percent (25%) of the capital or voting rights of the counterparty, or who exercises effective control over it, will be identified, in line with the threshold used under FinCEN's Beneficial Ownership Information rule (section 12.6). That beneficial owner will, in turn, be screened against the lists in clause 9.3.1.

9.3.3 Understanding the business. Documenting the nature of the business relationship and the purpose of the transactions to be carried out with the counterparty, including the final destination of the goods where relevant under section 5.4.

9.4. Due Diligence on Agents and Representatives Abroad

Because Lori Internacional may rely on agents, representatives, or local intermediaries to operate in international markets, such third parties will be subject, at a minimum, to standard diligence under clause 9.2.2, and to enhanced diligence when operating in high-risk jurisdictions. Every agent must sign the contractual sanctions- and anti-corruption-compliance representations described in Chapter 10 before acting on the Company's behalf.

9.5. Due Diligence on Governmental Counterparties

Every food- or energy-supply transaction directed to a government, state entity, or state-owned enterprise will be subject, without exception, to enhanced diligence under clause 9.2.3, requiring additional documentation of: (i) the identity and position of the public officials involved in negotiating or approving the contract; (ii) the absence of undisclosed commissions, intermediaries, or atypical payments linked to the award; and (iii) the determination of a nexus to a sanctioned jurisdiction required by section 5.7 of this Manual, prior to accepting the transaction.

9.6. Due Diligence on Maritime Counterparties (Shipping KYCC)

Given the incorporation of international maritime transport as a business line under section 5.5, the Compliance Office will apply an enhanced due-diligence protocol to every vessel involved in a transaction, prior to entering into the corresponding charter agreement.

9.6.1 Vessel identification. Verification of the vessel's IMO number, current and historical name, and current and historical flag of registry, paying particular attention to recent name or flag changes.

9.6.2 Ownership and management chain. Identification of the registered owner, beneficial owner, commercial operator, and ship manager of the vessel, screened against the sanctions lists in clause 9.3.1 and against OFAC's list of blocked vessels.

9.6.3 Insurance-coverage verification (P&I). Verification that the vessel holds current hull and Protection & Indemnity (P&I) insurance coverage issued by an insurer not subject to sanctions.

9.6.4 AIS-history and port-call review. Review of the vessel's AIS positioning and port-call history for the preceding twelve (12) months, identifying signal gaps, undeclared ship-to-ship transfers, or calls at ports in sanctioned jurisdictions.

9.7. Ongoing Monitoring (KYCC — Know Your Customer's Customer)

Due diligence does not end when the relationship begins. Lori Internacional conducts periodic monitoring of its counterparties — including a fresh screening against the lists in clause 9.3.1 no less frequently than every twelve (12) months, or immediately upon a relevant update to those lists — to identify significant changes in their structure, activity, or reputation. If a counterparty ceases to meet the Company's ethical or legal standards, the Compliance Office will order the immediate suspension of any transaction.

CHAPTER 10

Contract Management and Mandatory Clauses

10.1. Objective of Contract Management

Every business commitment undertaken by Lori Internacional must be duly documented. Contract management is the legal mechanism that formalizes the Company's relationships, defines responsibilities, and establishes safeguards against potential breaches, regulatory risks, or disputes.

10.2. Contract Requirements

10.2.1 Clear identification of the parties. Complete legal information, good standing, and duly authorized legal representation.

10.2.2 Definition of subject matter. Precise description of the goods or services, delivery timeframes, and payment terms.

10.2.3 Regulatory-compliance clauses. Provisions obligating both parties to act in accordance with the law and to avoid unlawful practices.

10.3. Mandatory Clauses (Safeguards)

To protect the Company's integrity, all Lori Internacional contracts must include, where applicable, the following clauses:

10.3.1 Sanctions- and export-control-compliance clause. A representation by which the counterparty warrants that it is not subject to OFAC sanctions or BIS restrictions under section 9.3.1, and undertakes not to engage in acts of corruption or in the diversion of goods to unauthorized destinations or end users.

10.3.2 Governing law and jurisdiction. A clear definition of the legal framework governing the contract — with preference given to the law of the State of Florida, the Company's jurisdiction of incorporation — and the competent courts or dispute-resolution mechanisms.

10.3.3 Unilateral termination clause. Lori Internacional's right to terminate the contract immediately if the counterparty breaches compliance policies, is designated on a sanctions list after signing, or if the business relationship represents a legal or reputational risk to the Company.

10.3.4 Confidentiality. Protection of all sensitive information exchanged during the term of the relationship.

10.4. Legal Oversight

The Compliance Office, together with external legal counsel when required, is responsible for reviewing and approving the content of every contract before signing. No officer or employee has the authority to bind the Company through verbal agreements or documents that have not been validated under this procedure.

CHAPTER 11

Authorized Payment Protocols and Channels

11.1. Principle of Financial Transparency

Lori Internacional operates under a policy of total financial transparency. All payments made or received by the Company must be duly justified, recorded, and carried out through formal, verifiable banking or financial channels.

11.2. Authorized Payment Channels

11.2.1 Corporate accounts. Transactions must be carried out exclusively through bank accounts legally established in the name of Lori International, Inc. The use of personal accounts belonging to employees or third parties for the Company's commercial purposes is strictly prohibited.

11.2.2 Payment platforms. The use of financial-management platforms or digital payment gateways is authorized, provided such platforms meet due-diligence standards, are duly regulated, and allow for full traceability of funds.

11.2.3 International payments and correspondent banking. For international wire transfers, the finance area will verify the identity and sanctions-free status of the correspondent bank involved, and will confirm that the country of origin or destination of the funds is not subject to a comprehensive OFAC embargo.

11.2.4 Supporting documentation. No payment will be processed without the proper invoice, contract, purchase order, or supporting document justifying the commercial transaction.

11.3. Prohibitions in Payment Protocols

11.3.1 Prohibition on cash payments. To ensure transparency, the handling of significant amounts of cash in commercial transactions is prohibited. Every transaction must leave an electronic or banking trail.

11.3.2 Payments to unrelated third parties. Payments to entities or persons other than the commercial counterparty defined in the contract are prohibited, unless there is documented legal justification and express approval from the Compliance Office.

11.3.3 Anonymous payments. Lori Internacional does not accept or make payments through channels that prevent full identification of the sender or recipient of funds.

11.4. Transaction Monitoring

The finance area, together with the Compliance Office, will conduct periodic reviews to detect unusual patterns, duplicate payments, or transactions inconsistent with a counterparty's usual line of business. Any irregularity detected will result in the immediate withholding of payment until the situation is clarified.

CHAPTER 12

Reporting Obligations to Competent Agencies

12.1. Commitment to Cooperation

Lori Internacional recognizes its responsibility to cooperate with national authorities and international bodies in the prevention and detection of financial crimes and unlawful activities. The Company will maintain an open-door policy of full transparency in response to legitimate information requests.

12.2. Suspicious Activity Reporting (SAR)

The Compliance Office is the sole body authorized to assess and manage the reporting of any suspicious activity to competent authorities. A report will be considered necessary when there is a reasonable basis to suspect that a transaction:

- Is linked to unlawful activity or funds of unknown origin.
- Attempts to circumvent the due-diligence controls established in this Manual.
- Involves persons or entities subject to international sanctions, or listed by the BIS under section 5.4.

12.3. Tax and Registration Obligations

12.3.1 Tax compliance. The Company commits to filing all federal and state tax returns within established deadlines, ensuring that the information reported is consistent with the company's actual operations.

12.3.2 Annual Report to the Florida Division of Corporations. The administrative area will file the Annual Report required by section 607.1622 of the Florida Statutes within the legal deadline (no later than May 1 of each year), in order to maintain Lori International, Inc.'s “ACTIVE” status and prevent its administrative dissolution, in accordance with clause 3.1.2.

12.3.3 Record updates. It is the responsibility of the administrative area to keep information current with Sunbiz.org and other competent bodies, ensuring that contact information, legal representatives, registered agent, and corporate purpose are always up to date.

12.4. Beneficial Ownership Information Reporting (FinCEN BOI)

Pursuant to the Corporate Transparency Act and its Beneficial Ownership Information rule, the Compliance Office will verify whether Lori International, Inc. is required to file, and keep updated, a beneficial ownership information report with the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN), and will coordinate its timely filing, including any update required within thirty (30) days following a change to the reported information, unless one of the exemptions under that regulation applies.

12.5. Confidentiality of Reports

Every report filed with authorities will be handled with due confidentiality, protecting the integrity of Lori Internacional's commercial information. An internal record will also be kept of all communications and reports sent to competent bodies for control and audit purposes.

12.6. Response to Requests

In response to any information request from a competent authority, the Compliance Office will coordinate the Company's official response, ensuring that the information provided is accurate, relevant, and delivered in a timely manner.

CHAPTER 13

Ongoing Monitoring, Auditing, and Compliance Testing

13.1. Objective of Monitoring

Ongoing monitoring is intended to verify that the controls established in this Manual are effectively implemented in daily practice. Lori Internacional does not assume that its policies work on their own: it systematically tests and evaluates them.

13.2. Monitoring Programs

13.2.1 Monthly operational review. Random verification of customer and supplier files to ensure that due-diligence documentation is complete and current.

13.2.2 Transaction reconciliation. Quarterly review of financial movements against corresponding supporting documentation (invoices, contracts) to detect inconsistencies.

13.2.3 List validation. Automated or manual verification of the customer and supplier database against the sanctions and restricted-trade lists described in section 9.3.1.

13.3. Internal and External Audits: Principle of Independence

To avoid self-review and to honor the segregation-of-duties principle in section 4.5, the audit of the Compliance Program will be conducted in accordance with the following rules:

13.3.1 Independent internal audit. At least once a year, a person or body organizationally independent of the day-to-day administration of the Compliance Office — who may be an officer not involved in the audited operations, or preferably a certified public accountant or external advisor — will conduct a comprehensive review of this Compliance Program, reporting directly to the CEO and the Compliance Committee.

13.3.2 External audit. Lori Internacional reserves the right to engage external auditors to conduct additional independent assessments, thereby providing a greater level of transparency and credibility to third parties, banking partners, or authorities.

13.4. Compliance Testing

To measure the effectiveness of the system, periodic exercises will be conducted, including:

- **Reporting drills:** Assessing how quickly and accurately the team can respond to a hypothetical information request or the detection of an alert, measured against the timeframes in section 8.4.
- **Access testing:** Verifying that digital security controls and access to sensitive information are functioning according to the responsibility levels defined in Chapter 4.

13.5. Corrective Actions

Any negative finding arising from monitoring or audit activities must give rise to a Corrective Action Plan. This plan must clearly document the problem, the root cause, the corrective measure, and the person responsible for its execution, ensuring the error does not recur.

CHAPTER 14

Whistleblower Channel and Internal Investigations

14.1. The Whistleblower Channel System

Lori Internacional establishes a Whistleblower Channel as its primary tool for early detection. This channel is universally accessible to employees, suppliers, and customers. It guarantees:

14.1.1 Absolute confidentiality. The identity of the whistleblower will be protected at all times, limiting access to the information to only those Compliance Office personnel who strictly need it.

14.1.2 Non-retaliation policy. The Company strictly prohibits any disciplinary action, harassment, or discrimination against anyone who makes a good-faith report, even if the subsequent investigation determines that no violation occurred.

14.2. Investigation Protocol and Timeframes

Stage	Action	Maximum Timeframe
1. Receipt and classification	Receipt of the report and preliminary admissibility assessment	3 business days
2. Evidence gathering	Review of financial records, emails, contracts, and confidential interviews	Depending on case complexity
3. Right to a defense	Notification to the person under investigation and opportunity to respond	10 business days from initiation
4. Final determination	Conclusive report and recommendation of measures to Executive Leadership	30 business days from receipt

When a report involves the Compliance Officer or a member of Executive Leadership, the investigation will be conducted by independent external legal counsel, reporting directly to the members of the Compliance Committee not involved in the matter.

CHAPTER 15

Training, Coaching, and Staff Awareness

15.1. Comprehensive Training Program

Compliance training is not optional. Lori Internacional structures its training program around three core pillars:

15.1.1 Program induction. Every new collaborator must complete the reading and acceptance of this Manual as a prerequisite to beginning their duties.

15.1.2 Topic-based training. Mandatory annual sessions focused on critical topics: OFAC sanctions and export controls, anti-money laundering, corporate ethics, identification of suspicious transactions, and conflict-of-interest management.

15.1.3 Continuous updates. Short workshops in response to significant regulatory changes or entry into new market sectors, ensuring the team knows the new rules of the game.

15.2. Knowledge Assessment

To ensure effectiveness, each training session will include a practical assessment. The results of these assessments will form part of the employee's compliance file and will be reviewed by Executive Leadership to ensure the ethical culture is understood at every level.

15.3. Records and Documentation

The Compliance Office will maintain an individualized record of the training received by each employee, including date, content, and assessment result, in accordance with the record-retention policy in Chapter 17.

CHAPTER 16

Disciplinary Regime and Consequences of Non-Compliance

16.1. Classification of Offenses

To ensure proportionality of measures, violations are categorized as follows:

Category	Examples	Consequence
Minor Offenses	Minor administrative non-compliance or negligence in completing forms, with no financial or reputational impact.	Written warning and mandatory retraining.
Serious Offenses	Intentional omission of controls, minor document falsification, or failure to comply with due-diligence policies.	Temporary unpaid suspension and possible termination of contract.
Very Serious Offenses	Involvement in acts of corruption, bribery, evasion of OFAC sanctions or export controls, facilitation of unlawful activity, or concealment of crimes.	Immediate termination of the employment/commercial relationship and reporting to competent authorities.

16.2. Zero Tolerance

Senior leadership is held to the same standards as the rest of the personnel. Hierarchical position does not excuse responsibility; on the contrary, it is considered an aggravating factor in the event of a violation, given the leadership position and the example it sets within the organization.

16.3. Disciplinary Procedure

The disciplinary procedure will be initiated based on findings from an internal investigation under Chapter 14, an audit under Chapter 13, or the direct observation of a violation by a supervisor. No person will be sanctioned without having had a reasonable opportunity to know the facts alleged against them and to present their version of events, except in cases of immediate precautionary suspension reasonably warranted by the severity of the situation.

CHAPTER 17

Record Retention and Documentation (File Retention)

This chapter establishes Lori Internacional's document-retention policy, referenced throughout this Manual, which constitutes the primary evidence of the effective operation of the Compliance Program.

17.1. General Retention Period

17.1.1 General rule. Every record related to a transaction, business relationship, or compliance activity will be retained for a minimum period of five (5) years, counted from the date the corresponding transaction or business relationship ends, or from the minimum period required under applicable federal, state, and commercial tax regulations, whichever is longer.

17.1.2 Extended-retention exceptions. Records linked to an ongoing internal investigation (Chapter 14), a disciplinary proceeding (Chapter 16), or a suspicious activity report filed with a competent authority (Chapter 12), will be retained until the definitive conclusion of the corresponding proceeding, regardless of whether that period exceeds the general five (5) years.

17.2. Categories of Records Subject to Retention

Record Category	Manual Reference
Corporate documentation (incorporation, annual reports, BOI)	Chapter 3, §12.4
Due-diligence files (KYC/KYCC) and agent files	Chapter 9
Contracts and their mandatory clauses	Chapter 10
Proof of payment and financial supporting documentation	Chapter 11
Suspicious activity reports and communications with authorities	Chapter 12
Internal and external audit reports	Chapter 13
Records of reports and internal investigations	Chapter 14
Staff training records	Chapter 15
Disciplinary files	Chapter 16

17.3. Format, Security, and Custody

Records may be kept in physical or electronic format, provided the medium used guarantees their integrity, availability, and legibility for the entirety of the retention period. Access to records will be restricted to Compliance Office personnel and to those individuals who, by reason of their function, require such access; records of a particularly sensitive nature — in particular, those relating to reports and internal investigations and to disciplinary files — will be subject to an enhanced access-restriction level. The Compliance Office acts as the institutional custodian of all records described in this chapter.

17.4. Destruction of Records

Once the applicable retention period has expired, and provided there is no ongoing proceeding that justifies extended retention under clause 17.1.2, records may be destroyed in accordance with the Company's internal document-management procedure, with a record kept of the date and the person responsible for such destruction.

CHAPTER 18

Updates and Revisions to the Compliance Plan

This chapter establishes the formal procedure by which this Manual will be reviewed and updated, recognizing that the regulatory environment in which Lori Internacional operates is subject to frequent change.

18.1. Ordinary Review

This document will be reviewed in full every twelve (12) months, coinciding with the risk-assessment cycle of Chapter 7 and the internal-audit cycle of Chapter 13, in order to incorporate any adjustments arising from those processes.

18.2. Extraordinary Review

The Manual will be subject to extraordinary review upon any of the following events:

- Significant legal or regulatory changes in the jurisdictions where the Company operates, including modifications to OFAC sanctions programs or the EAR.
- Internal restructurings of the Company, including changes to its organizational or governance structure, or to its relationship with related entities under section 4.4.
- Addition of a new business line or geographic market under Chapter 5.
- Identification of a critical finding in an internal or external audit, or in an investigation arising from the whistleblower channel.

18.3. Update Procedure and Version Control

Every modification must be approved by the Compliance Committee, recorded in this Manual's version-control log, and formally communicated to all members of the Company, who must confirm receipt and understanding by digital or physical signature.

Version	Date	Summary of Changes	Approved by
1.0	July 2026	Original issuance of the Compliance Plan Manual	Richard González (CEO)
2.0	July 2026	Enhanced edition: jurisdictional identification (Florida, Doc. No. P22000025803); specific legal framework (OFAC/IEEPA, EAR/BIS, FCPA, BSA, Corporate Transparency Act, Florida Business Corporation Act, FIPA); Compliance Committee; management of conflicts of interest with related entities; export controls and dual-use goods; personal-data protection; specific sanctions lists and UBO threshold; due diligence on foreign agents; escalation and investigation SLAs; internal-audit independence; and BOI reporting to FinCEN.	Richard González (CEO)
3.0	July 2026	Expansion of business lines: international maritime transport (with shipping KYCC due diligence, §9.6); energy trading; large-scale food supply; and spare parts/additives for the oil sector. Incorporates the suspensive condition in section 5.7 (mandatory determination of a nexus to a sanctioned jurisdiction and of a specific legal basis,	Richard González (CEO)

Version	Date	Summary of Changes	Approved by
		with Compliance Committee approval, prior to executing energy, oil, or government food-supply transactions) and reinforces the prohibition on structuring between related entities (§4.4.3).	

This version-history table shall be completed by the Compliance Office with each successive update to the Manual.

CHAPTER 19

Definitions, Glossary of Terms and Acronyms

This chapter consolidates, for quick reference, the technical terms and acronyms used throughout this Manual.

19.1. Glossary of Terms

Term	Definition
Ultimate Beneficial Owner (UBO)	A natural person who owns or controls, directly or indirectly, 25% or more of a counterparty, or who exercises effective control over it (§9.3.2).
Dual-Use Goods	Goods with both civil and military applications, subject to export control under the EAR (§5.4).
Compliance Committee	A collegiate body composed, at minimum, of the CEO and the Compliance Officer, responsible for deciding on high-risk transactions and findings (§4.3).
Enhanced Due Diligence (EDD)	An intensified verification procedure applicable to elevated-risk counterparties (§9.2.3).
Related Entity	A legal entity that shares management, shareholders, or a domicile with Lori Internacional (§4.4).
KYC (Know Your Customer)	Procedures for identifying and verifying counterparties (Chapter 9).
KYCC (Know Your Customer's Customer)	Ongoing monitoring of a counterparty throughout the business relationship (§9.5).
Corrective Action Plan	A document recording an audit or monitoring finding, its root cause, the corrective measure, and the person responsible for its execution (§13.5).
Suspicious Activity Report (SAR)	A formal communication to a competent authority upon reasonable suspicion of a transaction linked to unlawful activity (§12.2).
Inherent / Residual Risk	The level of risk before and after, respectively, the application of the internal controls in Chapter 8.
Red Flag	An objective indicator of a possible violation that triggers the duty to report to the Compliance Office.
U.S. Person	A U.S. person for purposes of sanctions and export-control law, a category that includes any company incorporated under the laws of a U.S. state (§3.1.1).

19.2. Glossary of Acronyms

Acronym	Meaning
BIS	Bureau of Industry and Security (U.S. Department of Commerce)
BOI	Beneficial Ownership Information
BSA	Bank Secrecy Act
CEO	Chief Executive Officer
EAR	Export Administration Regulations
ECCN	Export Control Classification Number
EDD	Enhanced Due Diligence
FCPA	Foreign Corrupt Practices Act
FinCEN	Financial Crimes Enforcement Network (U.S. Department of the Treasury)
FIPA	Florida Information Protection Act
FATF	Financial Action Task Force
IEEPA	International Emergency Economic Powers Act
IMO	International Maritime Organization (a vessel's unique identification number)
KYC / KYCC	Know Your Customer / Know Your Customer's Customer
OFAC	Office of Foreign Assets Control (U.S. Department of the Treasury)
P&I	Protection and Indemnity (insurance)
SAR	Suspicious Activity Report
SDN List	Specially Designated Nationals and Blocked Persons List
SSI List	Sectoral Sanctions Identifications List
UBO	Ultimate Beneficial Owner

This glossary will be updated by the Compliance Office in accordance with the procedure in Chapter 18.

CHAPTER 20

Plan Approval, Certification, and Effective Term

This chapter constitutes the formal closing of Lori Internacional's Compliance Plan Manual, through the express certification of its approval by Leadership and the Compliance Office, and the declaration of its effective term in accordance with the terms set out on the Cover Page of this document.

20.1. Statement of Document Integrity

It is hereby recorded that this document, identified as LORI-CMP-001, Version 3.0, comprising the twenty (20) preceding chapters, constitutes the complete and consolidated version of Lori International, Inc.'s Compliance Plan Manual, entirely superseding Versions 1.0 and 2.0, and any draft, memorandum, or preliminary version previously circulated.

20.2. Certification by the Chief Executive Officer

The undersigned, in their capacity as Chief Executive Officer of Lori Internacional, certifies: (i) that they have fully reviewed the content of this Manual; (ii) that they formally approve its implementation across the entirety of the Company's operations; (iii) that they reaffirm the commitment of Leadership stated in Chapter 1; and (iv) that they commit to providing the Compliance Office with the resources necessary for its effective execution.

20.3. Certification by the Compliance Officer

The undersigned, in their capacity as Compliance Officer of Lori Internacional, certifies: (i) that this Manual has been prepared in accordance with a reasonable analysis of the Company's operational, legal, and regulatory risks, including its status as a U.S. person subject to OFAC sanctions and export controls; (ii) that they assume responsibility for its implementation, monitoring, and updating under Chapters 4, 13, and 18; and (iii) that they will report to the Compliance Committee, at the frequency established in this Manual, on the status of the Program's compliance.

20.4. Effective Term

20.4.1 Entry into force. This Manual takes effect upon signature by Lori Internacional's Executive Leadership, on the date indicated on the Cover Page.

20.4.2 Indefinite term subject to update. This Manual will remain in effect indefinitely, without prejudice to its annual ordinary review and to any extraordinary reviews under Chapter 18.

20.4.3 Termination of prior versions. As of the effective date of this Version 3.0, Versions 1.0 and 2.0, and any other internal Lori Internacional compliance policy, manual, or procedure inconsistent with the content of this Manual, are hereby superseded.

20.5. Substantive Closing Certification Signatures

Unlike the administrative issuance approval recorded on the Cover Page of this document, the signatures set out below certify the substantive review of the Manual's entire content and the express assumption of the responsibilities described in sections 20.2 and 20.3, constituting the formal closing act of this document.

Richard González

Chief Executive Officer (CEO)

Lori International, Inc.

Date: ______ / ______ / ____________

____

Compliance Officer

Lori International, Inc.

Date: ______ / ______ / ____________

Corporate Information

Legal Name:

Lori Internacional INC.

Principal Address:

11231 NW 20th St Suite 140-337, Miami, FL 33172 USA

Main Phone:

+1 (786) 929-9393

Corporate Email:

info@lorinternacional.com

Website:

https://lorinternacional.com/

Document LORI-CMP-001 — Version 3.0 — Lori International, Inc. — End of the Compliance Plan Manual.