

WAIVER

Use of Anatel Homologation Certificate issued in the name of a third party

EUROSUL FORNECEDORA DE NAVIOS LTDA | CNPJ: 03.178.524/0001-65

Internal use document

Issue date: 25/09/2026
Requesting department: Quality
Person in charge: Marcelo Pinheiro

1. Purpose of the waiver

Approval of the use of Anatel Homologation Certificate No. **04350-23-07588** as the conformity document for the **Jotron TR-910** product, for:

- a) inclusion on Eurosul's corporate website;
- b) registration in the Hardness system;
- c) **sale of the product** by Eurosul within Brazilian territory;

even though the certificate is **non-transferable** and issued in the name of a third party.

The **validation** of this waiver is the responsibility of **Jotron AS**, manufacturer of the product. **MG Certification Holder Ltda.**, the applicant for the certificate before Anatel, only **authorizes** Eurosul to use its Homologation Certificate for the purposes above.

2. Certificate data

- **Certificate owner:** Jotron AS (manufacturer)
- **Applicant before Anatel:** MG Certification Holder Ltda. – CNPJ 42.510.809/0001-03
- **Manufacturer:** Jotron AS – Norway
- **Model:** TR-910
- **Type/Category:** Mobile Transceiver – Category III
- **Characteristics:** 118.0 to 136.975 MHz; 10 W; emissions 6K00A3E and 5K60A3E
- **Application:** Airband VHF radio for the Aeronautical Limited Mobile Service (search and rescue)
- **Issue date:** 29/04/2026
- **Expiry date:** 29/04/2029

3. Description of the deviation

The TR-910 certificate is valid, but it was issued in the name of MG Certification Holder Ltda. (applicant), and not Eurosul. Pursuant to Anatel Resolution No. 715/2019, the homologation certificate cannot be transferred. This waiver approves its use by Eurosul for the promotion and sale of the product.

4. Justification

- The certificate is valid, in force, and can be publicly consulted in the SCH/Anatel system.
- The homologation refers to the product (model TR-910), and the product supplied by Eurosul is identical to the homologated one.
- Eurosul acts as a distributor/reseller of the product, without altering its technical characteristics.
- As informed by Jotron AS, the homologation process was carried out with the support of an outsourced company, MG Certification Holder Ltda., which appears as the applicant on the certificate. Ownership of the

certificate, however, belongs to Jotron AS, manufacturer of the product.

- MG Certification Holder Ltda. authorizes Eurosul to use Homologation Certificate No. 04350-23-07588, without this implying a transfer of the homologation.
- Jotron AS, as manufacturer, validates this waiver and confirms that the product sold by Eurosul corresponds to the homologated one.

5. Risk analysis

- **Risk:** interpretation that Eurosul (CNPJ 03.178.524/0001-65) is the holder of the homologation. **Mitigation:** promotional materials and commercial documents must clearly identify the owner (Jotron AS) and the applicant of the certificate (MG Certification Holder Ltda. – CNPJ 42.510.809/0001-03).
- **Risk:** expiry or cancellation of the certificate. **Mitigation:** periodic consultation in SCH/Anatel by certificate number and by the applicant's CNPJ (42.510.809/0001-03), and validity control in Hardness.
- **Risk:** change in the registration status of the applicant (CNPJ 42.510.809/0001-03) or in its link to the certificate. **Mitigation:** verify in SCH/Anatel whether the certificate remains linked to this CNPJ and monitor its registration status with the Brazilian Federal Revenue Service (Receita Federal).
- **Risk:** sale of a product that differs from the homologated one. **Mitigation:** check of the model, technical characteristics and Anatel identification upon receipt of each batch.
- **Risk:** sale of units without homologation identification. **Mitigation:** blocking the sale of units without the Anatel seal/code.
- **Risk:** use of the radio by the customer outside the authorized conditions. **Mitigation:** inform the customer, in the proposal or in the manual, that the equipment must operate on the frequencies and power levels authorized by the competent authority.

6. Conditions for approval

1. On the website and in Hardness, the certificate must be presented as "product homologation", stating the owner (Jotron AS), the applicant (MG Certification Holder Ltda.), the number and the expiry date, without indicating Eurosul as the holder.
2. The document must be published in full, without edits.
3. Only TR-910 model units manufactured by Jotron AS, identical to the homologated ones and bearing the Anatel identification, may be sold.
4. Commercial proposals, invoices and sales documents must cite the certificate number (04350-23-07588) and the owner (Jotron AS).
5. Quality must verify the status of the certificate in SCH/Anatel at the frequency below and before each sale to a public agency, recording the verification.

Verification frequency: Every 6 months

6. In the event of cancellation, suspension or expiry, sales must be suspended and the certificate removed from the website and from Hardness immediately.
7. Before the first sale, the validation signed by Jotron AS and the authorization from MG Certification Holder Ltda. for the use of the certificate by Eurosul must be attached to this waiver.

7. Validity of the waiver

Until **29/04/2029** (certificate expiry date), or until revocation, whichever occurs first.

8. Attachments

- Anatel Homologation Certificate No. 04350-23-07588
- Authorization from MG Certification Holder Ltda. for the use of the certificate by Eurosul
- SCH/Anatel consultation

9. Signature method

This document must be signed by the legal representative of Jotron AS either electronically, through the **gov.br** platform, or physically, with a **notarized signature (firma reconhecida em cartório)**. In either case, the signature must be valid and verifiable. Digitized signatures, signatures pasted as images or signatures without legal validity will not be accepted.

10. Validation

I declare, in my capacity as legal representative of Jotron AS, manufacturer of the product, that I have reviewed this waiver, including the described deviation, the justification, the risk analysis and the established conditions, and I **validate** the use of Anatel Homologation Certificate No. 04350-23-07588 for inclusion on the corporate website, registration in the Hardness system and sale of the Jotron TR-910 product by Eurosul Fornecedora de Navios Ltda., under the terms of this document, subject to the authorization of use granted by MG Certification Holder Ltda. (CNPJ 42.510.809/0001-03), applicant for the certificate.

Place and date:

  **JOTRON**
FRANK LOKE CERTIFICATION MANAGER

Legal Representative
JOTRON AS
Ringdalskogen 8, 3270 – Norway