

# AML / KYC Policy

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**Owner:** Compliance — LIMITLESS SKY & SEA LLC **Effective:** on issue · Reviewed at least annually.

## 1. Purpose and scope

LIMITLESS SKY & SEA LLC ("Limitless Sky") is not currently a listed obliged entity under the US Bank Secrecy Act regulations covering Money Services Businesses (31 CFR § 1010.100(ff)) and is not currently an obliged entity under the EU 4th/5th AMLD framework. From 10 July 2027 the EU AMLR (Regulation (EU) 2024/1624) extends reporting obligations to traders in aircraft sold for >€7.5 million; pure charter brokerage is not within the listed obliged-entity categories of that Regulation.

Limitless Sky nevertheless applies a voluntary anti-money laundering and know-your-customer programme because (a) banking partners require it, (b) private aviation is regularly used as a vector by sanctioned and high-risk parties, and (c) cash and crypto-equivalent payments at private-aviation price points routinely trigger reporting under 26 USC § 6050I (Form 8300).

## 2. Customer Due Diligence (CDD)

For every new charterer we collect, before confirming the first flight:

- 1 Full legal name, principal address, date of birth (individual) or registered office and registration number (entity).
- 2 Government-issued photo ID (passport or national ID) for the contracting individual, the entity's authorised signatory, and — where the entity is privately held — for each beneficial owner of 25% or more.
- 3 Source of funds confirmation: signed statement plus, for payments over USD 100,000, evidence (bank statement, accountant letter, transaction proof).
- 4 List of intended passengers with date of birth and nationality.
- 5 Sanctions screening per the Sanctions Compliance Policy (doc 04).

For returning charterers we refresh ID at least every two years and re-screen on every booking.

## 3. Enhanced Due Diligence (EDD) triggers

EDD is applied when one or more of the following is present:

- Politically Exposed Persons (PEP), their immediate family or close associates (current or within the prior twelve months).
- Charterers, beneficial owners, payers or destinations linked to FATF grey/blacklisted jurisdictions or to jurisdictions under sectoral EU/OFAC sanctions.

- Transactions paid in cash or cash-equivalent instruments, or paid by a third party who is not the charterer.
- Routes with one leg into or out of a sanctioned jurisdiction.
- Any unusual pattern (e.g., last-minute large bookings, frequent re-routing, requests to split invoices).

EDD includes: senior approval from the Compliance Officer before booking, adverse-media screening, written source-of-funds and source-of-wealth justification, and (where applicable) advance written legal sign-off.

## 4. Cash payments and Form 8300

Cash, cashier's checks, money orders and similar instruments aggregating over USD 10,000 in a single transaction or related transactions trigger an IRS / FinCEN Form 8300 filing within 15 days of receipt (26 USC § 6050I; 31 USC § 5331). Charterer is notified in writing per § 6050I(e). Structuring transactions to evade the threshold is a separate federal offence under 31 USC § 5324; staff who suspect structuring escalate to the Compliance Officer and refuse the booking.

## 5. Record keeping

All CDD/EDD documentation is retained for:

- **US:** minimum 5 years from the end of the customer relationship (Bank Secrecy Act guidance baseline).
- **EU:** 5 years from the end of the business relationship, extendable by national law up to 10 years (Art. 56 Dir. (EU) 2024/1640).

Records are stored encrypted at rest, access logged.

## 6. Suspicious activity escalation

Any staff member who suspects a transaction is connected to money laundering, terrorist financing, sanctions evasion, fraud, or other criminal activity escalates immediately and confidentially to the Compliance Officer. The Compliance Officer assesses, documents the decision, and where appropriate (a) declines the booking, (b) files Form 8300 / a Suspicious Activity Report with the relevant FIU, (c) freezes already-received funds pending guidance, and (d) instructs counsel.

Tipping-off is strictly prohibited.

## 7. Training and oversight

All client-facing staff complete annual training covering CDD/EDD triggers, sanctions, cash reporting, tipping-off prohibition, data protection, and escalation. The Compliance Officer maintains the training register.

## 8. Contact

Compliance Officer — [compliance@thelimitlessky.com](mailto:compliance@thelimitlessky.com).

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