

# Sanctions Compliance Policy

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

## 1. Programmes we follow

As a US-incorporated company contracting with US and international clients and operators, Limitless Sky complies with sanctions administered by:

- **OFAC (US):** SDN List and all consolidated sanctions programmes (50 USC §§ 1701-1707; 50 USC § 4305).
- **EU:** Council Regulations (EU) 833/2014 (Russia sectoral, including aircraft-related prohibitions in Art. 3d), (EU) 269/2014 (asset freezes), and the EU Consolidated Financial Sanctions List.
- **UK:** OFSI Consolidated List under the Sanctions and Anti-Money Laundering Act 2018.
- **UN Security Council** consolidated list.
- Any other competent authority where a flight touches its jurisdiction.

## 2. Pre-booking screening

Before any booking is confirmed and before any payment is accepted, the booking owner screens against the lists above:

- 1 Contracting charterer (entity and authorised signatory).
- 2 All beneficial owners holding 25% or more of a corporate charterer; for trusts and foundations, the settlor, trustees, protector and named beneficiaries.
- 3 Each named passenger.
- 4 The payer, if different from the charterer.
- 5 The Operator and the registered owner of the aircraft (cross-checked against the national registry and the ICAO 24-bit address).
- 6 The departure, destination and overflight states.

Screening uses a commercial sanctions database with daily updates; results — including no-hit results — are saved to the booking file.

## 3. Aircraft beneficial ownership look-through

Private-aviation assets are routinely held through SPVs in Cayman, Bermuda, Aruba (AWR), Guernsey and the Isle of Man. The EU 14th sanctions package (Reg. (EU) 2024/1469) tightened the look-through requirement. Compliance looks beyond the registered owner to the beneficial owner of the aircraft and asks the Operator for written confirmation of no sanctions linkage. A booking on an aircraft whose

beneficial-ownership chain cannot be evidenced is refused.

## **4. Russia-specific aviation prohibitions**

Art. 3d of Reg. (EU) 833/2014 prohibits the sale, supply, transfer or export of aircraft and aircraft components, and the provision of insurance, maintenance, repair and brokering services, to any person in Russia or for use in Russia. Limitless Sky will not arrange flights into, out of, or for the benefit of any person ordinarily resident in Russia or any sanctioned Belarusian person, regardless of the flag of the aircraft.

## **5. Match handling**

A potential match is treated as a true match until the booking owner and Compliance can document otherwise. While the review is pending:

- The booking is on hold.
- No funds are accepted; if funds have arrived, they are quarantined.
- No information about the review is disclosed to the customer (tipping-off prohibition).

If a true match is confirmed, the booking is refused, the funds are reported and (where required by US, EU or UK law) blocked, and an OFAC voluntary self-disclosure or equivalent EU/UK competent-authority report is considered.

## **6. Record keeping**

Screening records, match-analysis memos and decision logs are retained for 5 years (US) and the longer of 5 or 10 years under EU national law (Art. 56 Dir. (EU) 2024/1640).

## **7. Training, testing and governance**

All client-facing staff complete annual sanctions training. Compliance runs a quarterly sample test of completed bookings. Material changes to sanctions lists are circulated to the team within one business day.

## **8. Contact**

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

This document is part of the Limitless Sky compliance library. It is a working draft compiled from primary sources. Review with qualified counsel before signing, publishing or otherwise relying on it.