

SOP-02 — Sanctions Screening

Trigger: Every booking, before payment is accepted and before the charter agreement is countersigned. Re-run on any change of charterer, passengers, payer, Operator or aircraft. **Owner:** Booking owner (with Compliance Officer for matches).

Lists screened

- OFAC SDN + all consolidated programmes.
- EU Consolidated Financial Sanctions List (CFSP).
- UK OFSI Consolidated List.
- UN Security Council Consolidated List.
- Sectoral aviation prohibitions under Reg. (EU) 833/2014 (Art. 3d).

Steps

- 1 Capture in the booking record: charterer legal name, signatory, beneficial owners $\geq 25\%$ (entity / trust), every named passenger, the payer, the Operator legal name and ICAO/IATA, the aircraft tail number and registered owner, departure / destination / overflight states.
- 2 Run each name through the sanctions database. Save the report (PDF or screenshot with timestamp) to the booking file, including "no hit" results.
- 3 Verify the aircraft beneficial-ownership chain. If the registered owner is an SPV, request from the Operator a written confirmation of the ultimate beneficial owner and screen that too.
- 4 Russia / Belarus check: refuse if the charterer, any beneficial owner or any passenger is ordinarily resident in Russia or a sanctioned Belarusian person, regardless of nationality.
- 5 If clean: mark the booking "Sanctions cleared — <screeener initials> — <timestamp>". Proceed.

On a potential hit

- 1 Put the booking on hold immediately. Quarantine any funds already received. Do not tell the customer the reason for the hold (tipping-off prohibition).
- 2 Notify Compliance Officer within 1 hour.
- 3 Compliance documents a match-analysis memo (true match / false positive) with sources.
- 4 True match: refuse, block funds if required, consider OFAC voluntary self-disclosure or EU/UK competent-authority report, instruct counsel.
- 5 False positive: archive the memo, release the booking.

Records

5 years (US baseline). EU national law may require up to 10 — store all sanctions records for 10 years to be safe.

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