

# SOP-05 — KYC Onboarding for New Charterers

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**Trigger:** First booking by a new charterer; refresh every 24 months for returning charterers. **Owner:** Booking owner; Compliance Officer for EDD sign-off.

## Steps

- 1 Collect on the booking form:
- 2 Charterer legal name (individual or entity), address, DOB / registration number.
- 3 For entities: authorised signatory + beneficial owners  $\geq 25\%$ .
- 4 Contact phone (verified by callback) and email.
- 5 Passenger list with DOB and nationality.
- 6 Source of funds statement (free text).
- 7 Collect identity evidence:
- 8 Government-issued photo ID for the signatory and beneficial owners.
- 9 For entities: certificate of incorporation + register of beneficial owners (or equivalent).
- 10 Source of funds evidence:
- 11  $< \text{USD } 100\text{k}$  booking: signed statement sufficient.
- 12  $\geq \text{USD } 100\text{k}$ : also supporting evidence (bank statement, accountant letter, sale-of-business proof).
- 13 PEP and adverse-media screening on the signatory and on each beneficial owner  $\geq 25\%$ .
- 14 Sanctions screening per SOP-02.
- 15 If any EDD trigger (PEP, FATF grey-list nexus, cash payment, third-party payer, sanctioned-jurisdiction routing): assemble the EDD pack and route to Compliance Officer for written sign-off **before** the booking is confirmed.
- 16 Save everything in the charterer's CDD file. Mark the file with the next-review date (24 months).

## Refresh

At month 23, the system emails the booking owner to re-verify ID and re-run screening before the next booking.

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