



OS EXPRESS

OS Express Sanctions Compliance Policy

Revision 2

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1. Introduction & Statement of Policy

OS Express is committed to full compliance with international sanctions laws and regulations, including those issued by the European Union (EU), United Nations (UN), United States (OFAC), United Kingdom (OFSI), Switzerland (SECO), and other relevant authorities. This policy defines the framework through which OS Express ensures sanctions compliance across all operations, partnerships, and transactions.

We adopt a risk-based approach and maintain internal controls to prevent dealings with sanctioned individuals, entities, vessels, and jurisdictions. This policy is publicly available and may be presented to financial institutions, insurers, regulators, and clients.

2. Scope of Application

This policy applies to:

- All OS Express employees, contractors, and agents
- All subsidiaries, affiliates, and business units
- All third parties acting on behalf of OS Express (e.g., service providers, vendors, logistics partners)

It governs all activities conducted globally, including transport, trade, insurance, and documentation, regardless of local regulatory leniency. OS Express may apply stricter sanctions standards than those required locally to ensure global compliance.

3. Legal Framework

OS Express complies with:

- EU Sanctions: Autonomous and UN-transposed regimes, asset freezes, trade restrictions, and sectoral bans
- [EU Sanctions Map](#)
- [EUR-Lex Sanctions Portal](#)
- [European Commission Sanctions Page](#)
- OFAC (U.S.) Sanctions: SDN List, country-based embargoes, and activity-based restrictions
- [OFAC Sanctions List Search](#)
- [U.S. Treasury Sanctions Programs](#)
- UK Sanctions: Designations under the Sanctions and Anti-Money Laundering Act 2018
- [UK Sanctions List](#)
- UN Sanctions: Security Council measures implemented by member states [UN Sanctions Portal](#)
- Latvian National Sanctions Register: For local enforcement and listings
-  [ITVS.gov.lv – Latvian Sanctions Database](#)

4. Prohibited Activities

OS Express prohibits:

- Business with Sanctioned Territories (e.g., Crimea, Iran, North Korea, Syria)
- Dealings with Sanctioned Targets (individuals/entities on official sanctions lists)
- Transactions involving Red Flags (e.g., suspicious routing, shell entities, PEPs)
- Use of company resources for activities that violate sanctions laws

5. Preventive Measures & Screening

5.1 Know Your Counterparty (KYC)

All clients, suppliers, and vessels are screened against:

- OFAC SDN List
- EU Consolidated List
- UN Sanctions List
- UK Sanctions List
- Swiss SECO database
- Latvian ITVS database
- Refinitiv World-Check (where applicable)

Screening occurs:

- Before onboarding
- Upon detection of Red Flags
- Annually for all active relationships

5.2 Contractual Controls

- All contracts exceeding €5,000 must include sanctions compliance clauses
- Legal review is mandatory for high-risk jurisdictions or sensitive sectors

6. Training & Awareness

- All staff receive sanctions compliance training at onboarding and annually
- Specialized training is provided to teams handling finance, customs, and documentation
- Training covers sanctions risks, screening procedures, and reporting obligations

7. Reporting & Enforcement

- Suspected violations must be reported immediately to the Compliance Department
- OS Express enforces zero tolerance for retaliation against whistleblowers
- Violations may result in disciplinary action, termination, and legal consequences

8. Recordkeeping & Audit

- All screening records, approvals, and compliance decisions are retained for 5 years
- Records are securely stored and available for audit or regulatory review
- Compliance maintains logs of all Sanction Screening activities

9. Policy Maintenance and Revision Tracking

- This policy is reviewed and updated continuously to reflect evolving sanctions regimes
- Revision System: Each version corresponds to the number of EU sanctions packages adopted since OS Express's founding on 17 April 2025
- Current Revision: 17, reflecting the latest EU sanctions package adopted on 18 July 2025
- The policy is aligned with the latest EU measures, including asset freezes, vessel designations, and price cap adjustments

10. Questions & Contact

For questions, concerns, or to report a potential violation, contact:

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