

## Origination of IAT Entries

- ◆ Company is responsible for ensuring that all parties to international transactions, as well as the underlying purpose of the transactions, are **not** in violation of OFAC regulations and that appropriate steps are needed to investigate, suspend, reject, block, and report on transactions.
- ◆ Company is responsible for compliance with foreign payment system rules, regarding the authorization of the entry, of receiving country(s) involved with the international payments they originate.
- ◆ Company is obligated to use the SEC code IAT for debit or credit entries are part of a payment transaction involving a financial agency's office that is not located in the territorial jurisdiction of the United States.
- ◆ Company has the obligation to include the specific data elements defined within the Bank Secrecy Act's (BSA) Travel Rule.
- ◆ Company is required to provide seven mandatory Addenda Records to accompany each IAT entry in order to convey the information listed above.
- ◆ Company is permitted a maximum of five additional addenda records to accompany an IAT entry.
- ◆ Company and financial institution must agree to specific terms and conditions for the allocation of gains, losses, and the assumption of risk for foreign exchange.
- ◆ Company understands their requirements to comply with OFAC obligations and that the penalties for ignoring those obligations can be both criminal and civil.
- ◆ Company is responsible for understanding the foreign law or payments system rules that prohibit the processing of certain transactions.