



#### ■ Only after you've taken the following "due diligence" steps

##### Step 1

Is the "hit" or "match" against OFAC's SDN list or targeted countries, or is it "hitting" for some other reason (i.e., "Control List" or "PEP," "CIA," "Non-Cooperative Countries and Territories," "Canadian Consolidated List (OSFI)," "World Bank Debarred Parties," "Blocked Officials File," or "government official of a designated country"), or can you not tell what the "hit" is?

- If it's hitting against OFAC's SDN list or targeted countries, continue to 2 below.
- If it's hitting for some other reason, you should contact the "keeper" of whichever other list the match is hitting against. For questions about:
  - The Denied Persons List and the Entities List, please contact the Bureau of Industry and Security at the U.S. Department of Commerce at 202-482-4811.
  - The FBI's Most Wanted List or any other FBI-issued watch list, please contact the Federal Bureau of Investigation (<http://www.fbi.gov/contact/fo/fo.htm>).
  - The Debarred Parties list, please contact the Office of Defense Trade Controls at the U.S. Department of State, 202-663-2700.
  - The Bank Secrecy Act and the USA PATRIOT Act, please contact the Financial Crimes Enforcement Network FinCEN), 1-800-949-2732.
- If you are unsure whom to contact, please contact your interdict software provider which told you there was a "hit."
- If you can't tell what the "hit" is, you should contact your interdict software provider which told you there was a "hit."

##### Step 2

Now that you've established that the hit is against OFAC's SDN list or targeted countries, you must evaluate the quality of the hit. Compare the name in your transactions with the name on the SDN list. Is the name in your transaction an individual while the name on the SDN list is a vessel, organization or company (or vice-versa)?

- If yes, you do not have a valid match.\*
- If no, please continue to 3 below.

##### Step 3

How much of the SDN's name is matching against the name in your transaction? Is just one of two or more names matching (i.e., just the last name)?

- If yes, you do not have a valid match.\*
- If no, please continue to 4 below.

##### Step 4

Compare the complete SDN entry with all of the information you have on the matching name in your transaction. An SDN entry often will have, for example, a full name, address, nationality, passport, tax ID or cedula number, place of birth, date of birth, former names and aliases. Are you missing a lot of this information for the name in your transaction?

- If yes, go back and get more information and then compare your complete information against the SDN entry.
- If no, please continue to 5 below.

##### Step 5

Are there a number of similarities or exact matches?

- If yes, please call the hotline at 1-800-540-6322.
- If no, you do not have a valid match.\*

## If you are calling about an customer or consumer

### Step 1

Is the “hit” or “match” against OFAC’s SDN list or targeted countries, or is it “hitting” for some other reason (i.e., “Control List” or “PEP,” “CIA,” “Non-Cooperative Countries and Territories,” “Canadian Consolidated List (OSFI),” “World Bank Debarred Parties,” or “government official of a designated country”), or can you not tell what the “hit” is?

- If it’s hitting against OFAC’s SDN list or targeted countries, continue to 2 below.
- If it’s hitting for some other reason, you should contact the “keeper” of whichever other list the match is hitting against. For questions about:
  - The Denied Persons List and the Entities List, please contact the Bureau of Industry and Security at the U.S. Department of Commerce at 202-482-4811.
  - The FBI’s Most Wanted List or any other FBI-issued watch list, please contact the Federal Bureau of Investigation (<http://www.fbi.gov/contact/fo/fo.htm>).
  - The Debarred Parties list, please contact the Office of Defense Trade Controls at the U.S. Department of State, 202-663-2700.
  - The Bank Secrecy Act and the USA PATRIOT Act, please contact the Financial Crimes Enforcement Network (FinCEN), 1-800-949-2732.
- If you are unsure whom to contact, you should contact your interdict software provider which told you there was a “hit.”
- If you can’t tell what the “hit” is, you should contact your interdict software provider which told you there was a “hit.”

### Step 2

Now that you’ve established that the hit is against OFAC’s SDN list or targeted countries, you must evaluate the quality of the hit. Compare the name of your accountholder with the name on the SDN list. Is the name of your accountholder an individual while the name on the SDN list is a vessel, organization or company (or vice-versa)?

- If yes, you do not have a valid match.\*
- If no, please continue to 3 below.

### Step 3

How much of the SDN’s name is matching against the name of your accountholder? Is just one of two or more names matching (i.e., just the last name)?

- If yes, you do not have a valid match.\*
- If no, please continue to 4 below.

### Step 4

Compare the complete SDN entry with all of the information you have on the matching name of your accountholder. An SDN entry often will have, for example, a full name, address, nationality, passport, tax ID or cedula number, place of birth, date of birth, former names and aliases. Are you missing a lot of this information for the name of your accountholder?

- If yes, go back and get more information and then compare your complete information against the SDN entry.
- If no, please continue to 5 below.

### Step 5

Are there a number of similarities or exact matches?

- If yes, please call the hotline at 1-800-540-6322.
- If no, you do not have a valid match.\*

***\* If you have reason to know or believe that processing this transfer or operating this account would violate any of the Regulations, you must call the hotline and explain this knowledge or belief.***