

IS YOUR BUSINESS MAKING THESE 10 OFAC COMPLIANCE MISTAKES?

In an appendix to its framework of compliance commitments, the Office of Foreign Assets Control (OFAC) offers a list of 10 common violations that have led to enforcement actions over the years. Could your business be exposed to sanctions risk?



1. Lacking a formal OFAC sanctions compliance program



2. Failing to understand the applicability of OFAC's regulations



3. Facilitating transactions by non-U.S. persons, especially by overseas subsidiaries or affiliates



4. Exporting or re-exporting U.S.-origin goods, technology or services to OFAC-sanctioned people or countries



5. Processing payments through U.S. financial institutions for commercial transactions involving OFAC-sanctioned people or countries



6. Neglecting to update sanctions screening software and filters



7. Conducting improper due diligence on customers/clients (e.g., ownership, business dealings, etc.)



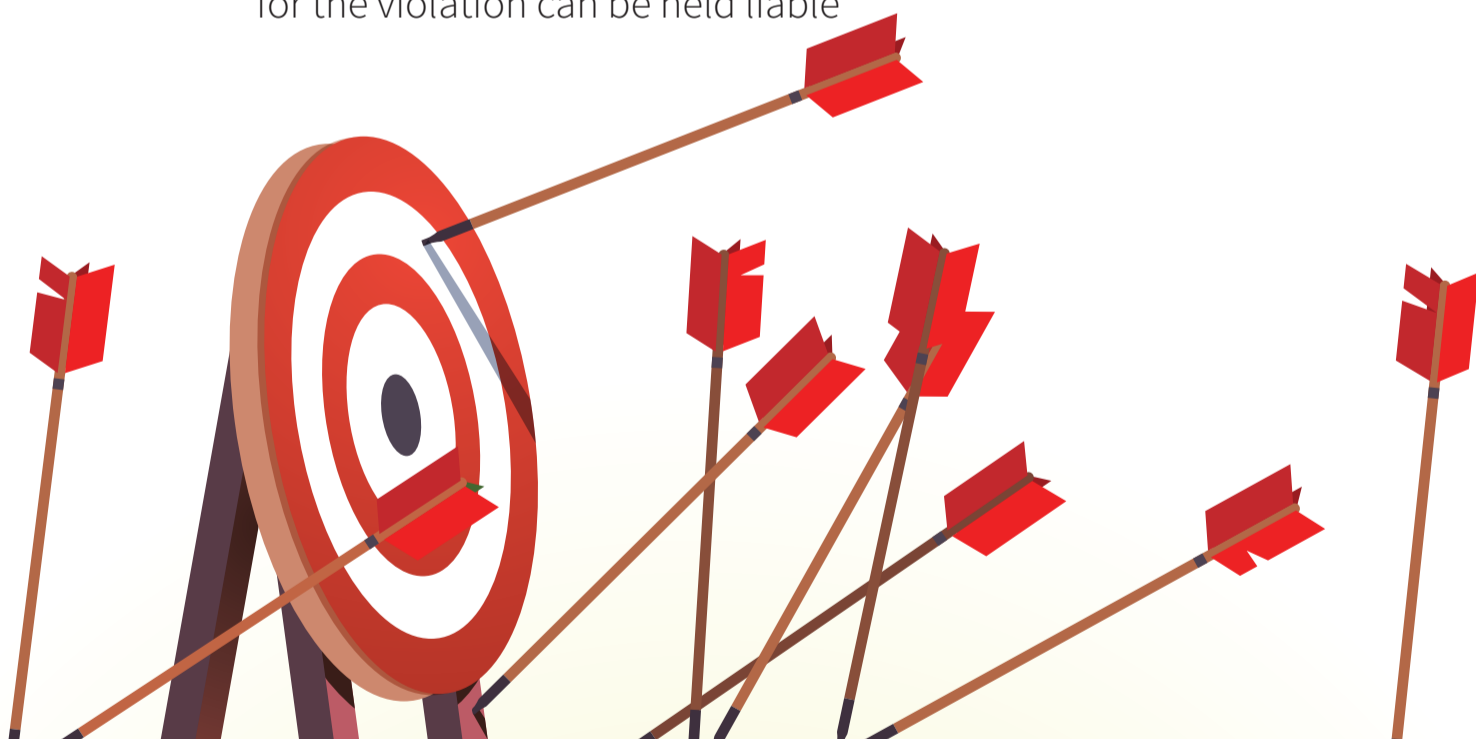
8. Decentralized compliance functions and inconsistent application of a sanctions compliance program throughout an organization



9. Using non-standard payment or commercial practices



10. Individual liability of managers, supervisors and senior management. OFAC states that both entities in violation and the people responsible for the violation can be held liable



As the penalties for OFAC enforcement actions continue to increase and impact organizations across every industry, no business can risk being complacent. Let us help you achieve a strong OFAC compliance program that coexists with your core business objectives.

Call 800-658-5638 or visit
risk.lexisnexis.com/watchlist-screening

