**Business:**

**WIRE TRANSFER POLICY**

##### Responsible Owner:

**Version 1.0**

# Wire Transfer Policy

### Assigned Responsibility:

## History

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| **Revision: Approved By Date** |
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### Purpose

To specify for the **[Organization Name]** (“**ORG**” or the “**Organization**”) policy for protecting **electronic payments** from all threats and to ensure continuity of key processes, minimize disruption and damage, as well as maximize all return on investments and opportunities.

### Applicability/Scope

This policy applies to all employees, associates, and independent contractors of ORG. ORG reserves the right to change, modify, add, or remove portions of this policy at any time. Federal laws, state laws, or other regulatory requirements may preempt this policy.

### Roles and Responsibilities

**Financial Coordinator:**

* Obtain wire transfer instructions, including the wire instructions from the payee’s bank.  If payee’s bank has multiple wire transfer choices, confirm the correct choice with the payee.
* Complete the Wire Transfer Form (please type for clarity).
* Attach the completed Wire Transfer Form and payee’s bank instructions to the supplier invoice.  Attach each document as a separate attachment.
* Complete and submit the supplier invoice.

**Chief Financial Officer or Equivalent:**

* Review Supplier Invoice and the wire transfer form for completeness
* Process wire transfer request in compliance with the Organization’s security procedures

### Enforcement

Failure to comply with wire transfer security policies shall result in sanctions as determined by the appropriate disciplinary procedure. For enforcement questions or clarification on any of the information contained in this policy, please contact the Organization’s Chief Financial Officer or the individual with responsibility for this policy as indicated on the policy cover page.

**Security Procedures**

This sets forth the Security Procedures agreed upon by the Organization and the Bank with respect to all wire funds transfers (or amendments or cancellations thereto).

**Use of User ID and Password**

The Security Procedures agreed upon by the parties for verifying the authenticity of Wire Transfers is the use of a log-in identification code (“User ID”), unique authentication code(s) (“Password”) and

Secure Access Code. Except as otherwise provided herein, the Organization agrees to use the User ID, Password and Secure Access Code to authenticate all Transfers and related messages transmitted through The Bank’s Online Banking.

The Bank shall provide the terms and procedures for using the User ID, Password and Secure Access Code including any other additional documents and correspondence relating to the User ID and Password (collectively referred to as “Online Banking Access”) only to an officer or other authorized person(s) of the Organization as being authorized to use and receive the same (“Organization Administrator”). The Organization Administrator shall issue and disseminate the Online Banking Access only to those individuals who are authorized by the Organization to initiate and transmit Entries to the Bank on behalf of the Organization (“Authorized User”). Each Organization Administrator shall also be deemed to be an Authorized User.

The Organization shall ensure that only Authorized Users who have been authorized by the Organization may use the Wire Transfer services. The Organization shall be solely responsible for controlling and monitoring the use of the Password and User ID and maintaining the confidentiality of such procedures and any other Online Banking Access and documentation. The Organization shall instruct all Organization Administrators and Authorized Users to treat the security procedures with extreme care. The Organization shall notify the Bank immediately of any unauthorized disclosure or use of the User ID and Password, including without limitation, if an Authorized User is no longer employed by the Organization, by telephone with a confirmation followed in writing. The occurrence of unauthorized access will not affect any transfers the Bank makes in good faith prior to receipt of such notifications and within a reasonable time period thereafter to prevent unauthorized transfers.

The Organization shall utilize the Organization’s User ID and Password to access the Online Banking service to transmit Wire Transfers. The Bank may act upon any Transfer upon verification of the Organization’s User ID and Password. The Organization agrees that the use of these Security Procedures constitute commercially reasonable methods of providing security against unauthorized Transfers. The Bank will have no obligation to act upon any Transfer unless and until such Transfer is verified in accordance with the agreed upon Security Procedures, and the Organization shall indemnify and hold the Bank harmless from any loss suffered or liability incurred by the Bank in refraining from executing any Transfer after all reasonable efforts to verify the same in accordance with the Security Procedures have failed or in delaying execution until such verification is obtained. A Wire Transfer received by the Bank shall be effective upon the Organization, whether or not authorized and regardless of the actual identity of the transmitter thereof, if such instruction is sent using the Security Procedures set forth herein. If a Wire Transfer entry (Transfer) received by the Bank was transmitted or authorized by the Organization, the Organization shall pay the Bank the amount of the Transfer, whether or not the Bank complied with the Security Procedures and whether or not that Transfer was erroneous in any respect or that error would have been detected if the Bank had complied with such procedures.

**Verification of Payment Orders**

Test Codes

• Each Transfer request must include a test code specifically issued to the Organization from the Banking Operations department. Test codes are unique identifiers and serve as additional Organization identification and authentication. Test codes are required for online and offline wire transfer requests. Organization is responsible for maintaining the security of test codes.

Call Back Verification

• Wire Transfer requests originated offline must be delivered to the Banking Operations department by phone, facsimile transmission or email and appropriate test codes utilized.

• All offline Wire requests will be verified by phone with the initiator via contact information provided by the Organization in the Online Banking agreement.

Transaction Authorization Codes (TAC’s)

• TAC’s are required for all online wire transfer requests. TAC’s may be delivered via mobile text message or verbal telephone receipt.

**Telephonic, Facsimile and Other Written Instructions**

The Organization providing the Bank a telephonic, facsimile transmission or by any other writing shall transmit the Wire Transfer order to the Bank at the telephone or fax number or location designated from time to time by the Bank for that purpose. The person shall represent herself or himself as an Authorized User by supplying the Bank the name and signature of an Authorized User on the facsimile or written instruction.

The Bank shall then:

1. Obtain from that person the Code assigned to that Authorized User

2. Obtain the wire transfer order from the Authorized User

3. Place a telephone call to the Authorized User at the telephone number designated by the Organization for such person

4. Request to speak to the Authorized User

5. Obtain the Code assigned to that Authorized User from the person purporting to be the Authorized User and then confirm the wire transfer order by obtaining from that person data regarding the amount of the wire transfer, the beneficiary and beneficiary's account.

6. Any other measures as we may deem appropriate or necessary

Organization acknowledges that the Security Procedures are commercially reasonable in the context of the Organization’s operation, requirements and internal procedures. The Security Procedures set forth above are approved by the Organization.

**Definitions**

**Wire Transfer:**Electronic transfer of funds through the networks that unite the world's banking system.

**ACH (Automated Clearing House):**An Electronic network for financial transactions in the United States.  ACH transactions are processed in batches and funds are typically available in the payee account the next business day.  ACH transfers are less expensive than wire transfers.

**Bank ABA Number:** The bank routing number

**BIC (Swift Code)** : A unique alphanumeric identifying code used to identify an institution among members of the SWIFT network (Society for Worldwide Interbank Financial Telecommunication).

**IBAN:**International Banking Account Number

**Sort Code (UK Only):**identifies both the bank and the branch where the account is held.

**Intermediary Bank:**The bank that processes a wire transfer after initiation by the Organization but prior to receipt by the payee’s bank.