



Global PAYplus

# Compliance FATF AML

Business Guide

Product Version: 4.5  
Catalog ID: GPP4.5-00-B09-03-201511

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## Version Control

Version	Date	Summary of Changes
1.0		Document creation
2.0	November 2015	Updated for rebranding
3.0	Sept 2018	Document updated to Finastra template

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# 1 Overview

## 1.1 Introduction

Compliance with the laws, rules and standards that govern banking activities helps maintain a financial institution's reputation with its shareholders, customers, employees and the investment community.

Compliance laws, rules and standards include the prevention of money laundering and terrorist financing. A financial institution that knowingly participates in transactions intended by customers to avoid regulatory or financial reporting requirements, evade tax liabilities or facilitate illegal conduct exposes itself to serious compliance risk.

The Office of Foreign Assets Control (OFAC) administers and enforces sanctions against countries and groups of individuals, such as terrorists and narcotics traffickers. These sanctions include the blocking of assets and trade restrictions to accomplish foreign policy and national security goals.

The GPP compliance feature enhances a financial institution's ability to implement the requirements of OFAC and similar regulatory bodies in other countries.

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Note: This document describes the compliance functionality for the High Value offering, where the Mass Payment Compliance functionality is different.

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## 1.2 Target Audience

This document describes the compliance check workflow. It is designed for business analysts and system administrators who need to set up and configure the compliance feature. It is also of value to anyone who wants to know more about how this feature is implemented.

## 2 Processing

### 2.1 Compliance Process

GPP provides a mechanism to ensure that relevant payment attributes are not listed in any of the OFAC lists of specially designated nationals (SDNs). This is accomplished by comparing SWIFT message tags (20, 21, 50, 52, 53, 56, 57, 58/9, 70 and 72) and the equivalent ISO2022 pain/pacs fields with all of the OFAC SDN lists.

The Compliance interface checks for a possible hit (i.e., the content of any designated field matches SDN data). If a possible hit occurs, the payment is sent to a manual queue for investigation.

When examining a possible hit in the manual status, the user can:

- Cancel the payment.
- Determine that the possible hit is not an actual hit and continue payment processing flow
- Determine that an actual hit occurred and send the payment to credit a suspense credit account instead of the original account the payment was supposed to credit.

The GPP Compliance interface invokes an interface (whether it is a real-time, immediate response interface or an asynchronous interface where the payment is parking before an answer is received) for compliance & fraud checking. This interface can be invoked either right after the payment was received into GPP, or later in the processing flow (after the full identification of the credit chain and balance Inquiry). The interface examines the OFAC SDN lists and returns with a list of possible hits.

This Compliance interface builds and sends an XML structure with the OFAC list name (taken from the business rule action) and multiple occurrences (occurrence per payment attribute that is marked to be checked per this functionality) of:

- Field name
- Field value

The response is an XML structure with

- OFAC status - optional
- Multiple occurrences of
  - Field name
  - Hit text
  - Hit type (compliance, fraud or both)

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Note: The message attributes that are available for compliance check are the ones marked by the special GI\_CHECK indicator on the logical field level.

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### 2.2 Compliance Check Invocation

1. The message is subjected to a specific work flow selected by Business Flow Selection rules.
  - High value work flow triggers the evaluation of Compliance Validation rules twice:
    - i. First evaluation - After the payment enters the system and basic properties are set.
    - ii. Second evaluation - after the full identification of the credit chain and just before the posting phase.
2. The Compliance Validation business rules are evaluated to determine whether a compliance check is required, and if it is – which check should be performed.
  - a. The rule may instruct to bypass the compliance check which results in the message continuing the rest of the flow.

- b. If the message is subjected to a compliance check, then the service/interface is invoked, and an XML structure with the list name and a set of Field Name/Value pairs of message attributes is sent to the external check.
3. In a-synchronic mode, the message waits until a response is received in the Compliance Wait status/queue.

## 2.3 Compliance Response Handling

When a response is returned, these analysis steps are performed:

1. If no possible hits are found, or previously found possible hits were overridden (i.e., identified in the previous check but was found to be a false hit), the message is released to continue processing.
2. If at least one possible hit is found:
  - a. In a-synchronic mode the message waits for the compliance check response in the Compliance Wait queue.
  - b. When a response is received:
    - i. If no hits were found – the message continues the processing.
    - ii. If hits were found and manual investigation and handling is required:
      - o The generic behavior is - the message is routed to the Compliance Exception queue
      - o If the name of the next queue is specified in the compliance check response – the message is routed to the specified queue. The separation of messages to different queues is done according to the specific nature of the check performed and hit found.

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Note: Hit checking continues until all possible hits are processed. Therefore, a hit check can cause more than one possible hit entry.

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## 3 Manual Handling of Possible Compliance Hits

### 3.1 Compliance/Fraud Hits Window

The message audit contains compliance data. The lists of possible hits are displayed by selecting (clicking) the compliance and fraud audit lines within the Audit Trail tab that each represents hits that were found on this message (See section Error! Reference source not found..) which results in the opening of the Compliance/Fraud Hits window. The following information is displayed in the window:

- Field Name – the name of the field that a possible hit was detected on.
- Field Value – the value of the field in the message.
- Hit Text – The matching text that was found in the compliance lists.

The field in the message screen for which a possible hit was found is highlighted in a color that indicates the type of hit:

- Compliance hits are highlighted in blue (see system parameter GUIC\_COMPL).
- Fraud hits are highlighted in yellow (see system parameter GUIC\_FRAUD).
- Hits for both compliance and fraud are highlighted in red (see system parameter GUICFRCOMP).

### 3.2 User Handling of a Possible Hit

The user must review possible hits, usually in the Compliance Exception queue, and take one of the following actions:

1. Confirm – click Accept - all possible hits are false hits and continue with payment processing. This causes the payment to go to the [Compliance Exception Approve](#) queue.
2. For a true hit, block the payment – click Block – and by this action, divert the funds from the original credit account to a special block account (payment reaches completion crediting the block account). The block account is defined by system parameter BLOCKACCOUNT and the account currency is taken from the payment Sttlm Ccy (X\_STTLM\_CCY) (i.e., concatenate the account number from the system parameter with the settlement currency from message).
3. Cancel - click Cancel - the payment is canceled (including all the relevant cancelation processing required such as reverse posting, if posting was already performed).
4. Send the payment to the Repair queue for manual repair – click Send to repair.

If the payment is confirmed from the [Compliance Exception](#) queue, it is sent to the [Compliance Exception Approve](#) queue for an additional review by a different user. Messages in this queue must be confirmed again to continue processing, but previous marking as 'not a hit' can also be refused by the second user, and message can also be canceled in this queue.



## 4 System Configuration and Business Setup

This section describes the system building blocks that are part of the compliance functionality, and are used during the message processing.

### 4.1 Business Setup

#### 4.1.1 System Parameters (N/A)

#### 4.1.2 Profiles

##### 4.1.2.1 Accounts

Create multiple accounts for the account that is specified in system parameter BLOCKACCOUNT (i.e., create a USD account for this account number as well as AUD, GBP, EUR, etc.)  
Message Attributes

The compliance check is performed on every payment attribute that is specified as LOGICAL\_FIELDS.GI\_CHECK = 1. These fields are the ones sent in the Compliance Request. To examine the currently defined attributes, use the following query:

Select T.GI\_CHECK from LOGICAL\_FIELDS t where T.GI\_CHECK =1

#### 4.1.3 Business Rules

##### 4.1.3.1 Compliance Validation

Description: The purpose of this business rule is to define whether the payment requires compliance check validation, and if it does, what type of check.

Rule Attachment: The Error! Reference source not found. rare attached to the local office. Multiple rules may be attached. The first rule that matches is the one selected and applied.

Rule Action: Bypass or a definition of the relevant check that needs to be done (whether it is a fraud check or compliance check). Possible values are defined in Fields\_Values (Field\_Type=COMPLIANCE\_CHECK).

**Rule Invocation and Evaluation:** The evaluation of this rule type is invoked twice in the High Value flow:

The first optional point - right after the payment was received into GPP

The second optional point - later in the processing flow (after the full identification of the credit chain and balance Inquiry)

**Usage:** According to the payment orchestration flow, payments undergo compliance check validation – once – either on the first invocation or the second one, or twice – on both invocations. If a matching rule is found, an interface is triggered and it sends a predefined list of payment details to the compliance check system to be checked against a 'black list'. The name of the check (the Action of the rule) is passed to that system to allow different types of checks (compliance/fraud). If a possible match is found, the payment is sent to the [Compliance Exception](#) queue, or to the queue specified in the response (only in synchronous mode).

To define a compliance validation invocation:

1. Create a Compliance Validation business rule that selects the either Bypass or the required validation check value
2. Attach the rules to a local office
3. Apply changes

#### Examples:

- To skip the first Compliance check which happens at the beginning of the processing, define a rule:

If Compliance validation sts (MF\_COMPLIANCE\_VALIDATION\_STS) is EMPTY  
OR Compliance validation sts (MF\_COMPLIANCE\_VALIDATION\_STS) = X  
then select Action = Bypass

- To perform the second Compliance check which happens at the end of the flow just before posting, define a rule:

If Compliance validation sts (MF\_COMPLIANCE\_VALIDATION\_STS) is NOT empty  
AND Compliance validation sts (MF\_COMPLIANCE\_VALIDATION\_STS) <> X  
then select Action = [OFAC Value]

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Note: OFAC Predebit sts (MI\_OFAC\_PREDBIT\_STS) and OFAC Preposting sts (MI\_OFAC\_PREPOSTING\_STS) can also be used in the rules to distinguish between the first and second invocation.

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## 4.2 System Setup

### 4.2.1 System Parameters

Term	Description	Value
GUIC_COMPL	HEX Color coding for message GUI fields that failed the GI compliance check. This option can be used only at the *** level.	3366FF
GUIC_FRAUD	HEX Color coding for message GUI fields that failed the GI fraud check. This option can be used only at the *** level.	FFFF00
GUICFRCOMP	HEX Color coding for message GUI fields that failed both the GI fraud and compliance checks. This option can be used only at the ***level.	008000
BLOCKACCOUNT	Specifies a suspense credit account (e.g., account number 12345678) that replaces the original credit account when an actual compliance hit occurs. The suspense account should reside in GPP SP and should not be currency specific – the specific account will be selected using the payment currency. Ensure this account exists for USD, EUR, AUD, etc.	99999999

### 4.2.2 System Rules

#### 4.2.2.1 Message Workflow Determination – STP

According to the payment orchestration flow, payments automatically undergo compliance checks. On receipt of a compliance response - if a possible match is found, the payment is routed, via this type of rule, to the Compliance Exception queue.

#### 4.2.2.2 Message Workflow Determination – Manual

- A rule that routes the message to the [Compliance Exception Approve](#) queue if the message was 'confirmed' in the Compliance Exception queue. Conditions of the rule should be:
  - Compliance validation sts (MF\_COMPLIANCE\_VALIDATION\_STS) = H  
AND
  - Force compliance (MU\_COMPLIANCE\_FORCE\_STS) <> F

- A rule that routes the message to continue processing if the message was 'approved' in the Compliance Exception Approve queue. Conditions of the rule should be:
  - Msg sts (P\_MSG\_STS) = APPROVE\_COMPEX  
AND
  - Button Id (D\_BUTTON\_ID) = Accept
- A rule that routes the message to return to the Compliance Exception queue if the message was 'refused' in the Compliance Exception Approve queue. Conditions of the rule should be:
  - Msg sts (P\_MSG\_STS) = APPROVE\_COMPEX  
AND
  - Button Id (D\_BUTTON\_ID) = Refuse

#### 4.2.2.3 Dual Control

Ensure the compliance exception user is added to the dual control user lists so the same user cannot approve the message again.

### 4.3 Statuses

#### 4.3.1 Compliance Exception

The Compliance Exception queue is the generic behavior queue for messages that failed to pass compliance interface checks for OFAC or AML.

Available compliance related buttons for Compliance Exception

Action	Description
Accept	Confirms message should continue normal processing even though it contains possible Compliance matches
Block	Blocks / holds funds of a payment that is approved as a compliance exception. The funds are diverted from the credit account to a special block account (payment reaches completion crediting the block account). The block account is defined by system parameter BLOCKACCOUNT
Resend	Resend payment to the compliance interface
Send to Repair	Routes the message to the Repair queue for modifying payment details. Payment status is set to REPAIR and previous postings, if already done, are reversed.
Cancel	Initiates the cancelation of the payment

#### 4.3.2 Compliance Exception Approve

The Compliance Exception Approve queue contains messages that require a second approval or refusal for the compliance exception dismissal action.

Available compliance related buttons for Compliance Exception Approve

Action	Description
Approve	Approve a compliance exception is not a hit. The decision in this queue is by a second user
Refuse	Refuse dismissal by the previous user (compliance exception is not a hit). The decision in this queue is by a second user
Cancel	Initiates the cancelation of the payment.

### 4.3.3 Compliance Wait

The Compliance Wait Approve queue contains messages that compliance request was sent for and are each waiting for the compliance response.

Available compliance related buttons for Compliance Wait

Action	Description
Force	Force the payment out of the Compliance Wait status and continue processing as if a no hit response was received.
Resend	Resend payment to the compliance interface
Send to Repair	Routes the message to the Repair queue for modifying payment details. Payment status is set to REPAIR and previous postings, if already done, are reversed.

### 4.3.4 Compliance Inactive

The Compliance Inactive queue contains messages that compliance request while the compliance interface is inactive, and are waiting for it to become active.

No buttons available in Compliance Inactive

## 4.4 Access Class Entitlements

Ensure proper access is provided to the relevant system users for the compliance exception queues as well as permission to act (action buttons) in these queues.

The user can select (click) this audit line to display a [Error! Reference source not found.](#) pop-up window that shows the Field Name, Field Value, and Hit Text that triggered the message.

## 5 Message Data

### 5.1 Message Attributes

#### 5.1.1 MINF - Compliance Related Parameters

Field ID	Name	Description
MF_COMPLIANCE_VALIDATION_STS	Compliance validation sts	Compliance validation status. Values: X – default (before compliance was invoked once) B – bypass of the check was performed W – waiting for a response H – a hit was found N – no hit was found S – payment seized
MU_COMPLIANCE_FORCE_STS	User force from ACK Compliance	Force compliance. Values indicates that the message was forced by a user. X – default
MI_OFAC_PREDBIT_STS	OFAC Predebit sts	Interface monitor status: OFAC Predebit Status. Set to P (for Pending) to indicate the 1st phase/point in flow in which the compliance check is triggered
MI_OFAC_PREPOSTING_STS	OFAC Preposting sts	Interface monitor status: OFAC Preposting Status Set to P (for Pending) to indicate the 2nd phase/point in flow in which the compliance check is triggered

### 5.2 Errors and Audit Trail

#### 5.2.1 Message Error

The following are the compliance related error codes logged in the Errors tab:

Code	Description
40137	Compliance validation failure
40142	Invalid setup - no compliance validation rule is defined

#### 5.2.2 Audit Trail

When a potential compliance and/or fraud hits are detected, these are logged in the Audit Trail tab.

The following are the possible audit lines:

Code	Description
40138	Compliance hits were found
40139	Fraud hits were found
40140	Compliance and fraud hits were found

## Appendix A: Fields to Check for Compliance

This table lists the ISO 20022 fields (and their SWIFT tag equivalents) that are checked when compliance checks are performed.

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
Cdtr account IBAN	Creditor IBAN	58/59	Beneficiary Customer
Cdtr acct BBAN	Creditor BBAN	58/59	Beneficiary Customer
Cdtr acct ID	Creditor account number (group)	58/59	Beneficiary Customer
Cdtr acct name	Creditor account name (group)	58/59	Beneficiary Customer
Cdtr adrline	Creditor address	58/59	Beneficiary Customer
Cdtr agt acct BBAN	Creditor agent BBAI	57	
Cdtr agt acct IBAN	Creditor agent IBAN	57	
Cdtr agt acct ID	Creditor agent account number	57	
Cdtr agt acct name	Creditor agent account number	57	
Cdtr agt adrline	Creditor agent address	57	
Cdtr agt BIC	Creditor agent BIC	57	
Cdtr agt CC	Creditor agent country code	57	
Cdtr agt ID	Creditor agent Nat'l Clearing Code	57	
Cdtr agt nm	Creditor agent name	57	
Cdtr agt prtry ID	Creditor agent Proprietary ID	57	
Cdtr BIC	Creditor BIC	58/59	Beneficiary Customer
Cdtr nm	Creditor name	58/59	Beneficiary Customer
Cov cdtr acct BBAN	Cover Creditor BBAN	58/59	Beneficiary Customer
Cov cdtr acct IBAN	Cover Creditor IBAN	58/59	Beneficiary Customer
Cov cdtr acct ID	Cover Creditor acc't num (group)	58/59	Beneficiary Customer
Cov cdtr acct name	Cover Creditor acc't name (group)	58/59	Beneficiary Customer
Cov cdtr adrline	Cover Creditor address	58/59	Beneficiary Customer
Cov cdtr agt acct IBAN	Cover Creditor agent IBAN	57	Account with Institution
Cov cdtr agt acct ID	Cover Creditor agent acc't number	57	Account with Institution
Cov cdtr agt acct nm	Cover Creditor agent acc't number	57	Account with Institution
Cov cdtr agt adrline	Cover creditor agent address	57	Account with Institution
Cov cdtr agt BIC	Cover creditor agent BIC	57	Account with Institution
Cov cdtr agt nm	Cover creditor agent name	57	Account with Institution
Cov Cdtr BIC	Cover Creditor BIC	58/59	Beneficiary Customer
Cov Cdtr Country	Cover Creditor country	58/59	Beneficiary Customer
Cov Cdtr nm	Cover Creditor name	58/59	Beneficiary Customer

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
Cov dbtr acct BBAN	BBAN of cover debtor acc't group	n/a	
Cov dbtr acct IBAN	Cover debtor account group IBAN	n/a	
Cov dbtr acct ID	Acc't ID of cover debtor acc't group	n/a	
Cov dbtr acct nm	Acc't name of cover debtor acc't grp	n/a	
Cov dbtr adrline	Cover debtor address	50	Ordering Customer
Cov dbtr agt acct IBAN	IBAN of the debtor agent account	n/a	
Cov dbtr agt acct ID	Account ID of debtor agent account	n/a	
Cov dbtr agt acct nm	Acc't name of debtor agent account	n/a	
Cov Dbtr agt adrline	Cover debtor agent address	52	Ordering Institution
Cov dbtr agt adrline1	Cover debtor agent address	52	Ordering Institution
Cov dbtr agt BIC	Cover debtor agent BIC	52	Ordering Institution
Cov dbtr agt BIC1	Cover debtor agent BIC	52	Ordering Institution
Cov dbtr agt ID	Cover debtor agent NCC	52	Ordering Institution
Cov dbtr agt ID1	Cover debtor agent NCC	52	Ordering Institution
Cov Dbtr agt nm	Cover debtor agent name	52	Ordering Institution
Cov dbtr agt nm1	Cover debtor agent name	52	Ordering Institution
Cov Dbtr BIC	Cover debtor BIC	50	Ordering Customer
Cov Dbtr Country	Cover debtor country	50	Ordering Customer
Cov dbtr nm	Cover debtor name	50	Ordering Customer
Cov intrmy agt acct IBAN	Cover intermediary agent 1 IBAN	56	Intermediary Institution
Cov intrmy agt acct ID	Cover intermediary agt 1 acc't num	56	Intermediary Institution
Cov intrmy agt acct name	Cover intermediary agt 1 acc't name	56	Intermediary Institution
Cov intrmy agt adrline	Cover Intermediary agent 1 address	56	Intermediary Institution
Cov intrmy agt adrline1	Cover Intermediary agent 1 address	56	Intermediary Institution
Cov intrmy agt BIC	Cover intermediary agent 1 BIC	56	Intermediary Institution
Cov intrmy agt BIC1	Cover intermediary agent 1 BIC1	56	Intermediary Institution
Cov intrmy agt ID	Cover intermediary agent 1 NCC	56	Intermediary Institution
Cov intrmy agt nm	Cover intermediary agent 1 name	56	Intermediary Institution
Cov intrmy agt nm1	Cover intermediary agent 1 name	56	Intermediary Institution

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
Cov Prev Instructing agt BIC	BIC of last agt before instructing agt	72	codeword INS
Cov Prev Instructing agt nm	Name of last agt before instruct. agt	72	codeword INS
Cov Unstructured rmt info	Remittance data to enable matching the payment at the beneficiary end	70	For INV, IPI, RFB, TSU and proprietary codewords
Dbtr acct BBAN	BBAN of the debtor account group	n/a	
Dbtr acct ccy	debtor account currency	n/a	
Dbtr acct IBAN	IBAN of the debtor account group	n/a	
Dbtr acct ID	Debtor account account ID	50	SWIFT originator
Dbtr acct nm	Acc't name of the debtor acc't group	n/a	
Dbtr adrline	Debtor address	50	Ordering Customer
Dbtr agt acct BBAN	BBAN of the debtor agent account	n/a	
Dbtr agt acct IBAN	IBAN of the debtor agent account	n/a	
Dbtr agt acct ID	Acc't ID of the debtor agent account	n/a	
Dbtr agt acct nm	Acc't name of the debtor agent acc't	n/a	
Dbtr agt address 1 Removal Group	Debtor agent address (group)	52	Ordering Institution
Dbtr agt address 2 Removal Group	Debtor agent address	52	Ordering Institution
Dbtr agt adrline	Debtor agent address	52	Ordering Institution
Dbtr agt BIC	Debtor agent BIC	52	Ordering Institution
Dbtr agt CC	Debtor agent country code	52	Ordering Institution
Dbtr agt ID	Debtor agent NCC	52	Ordering Institution
Dbtr agt nm	Debtor agent name	52	Ordering Institution
Dbtr cov agt CC	Debtor agent country code	52	Ordering Institution
dbtr ctry sub division	debtor country sub division	n/a	
Dbtr nm	Debtor name	50	Ordering Customer
dbtr pstl cd	debtor postal code	n/a	
End To End ID	End To End ID	21	Related Reference
eqvt amt	equiv amount	n/a	
eqvt amt ccy	equiv amount currency	n/a	
eqvt amt ccy of transfer	equiv amount currency of transfer	n/a	
Init oty country	Init party country	n/a	
Init pty adrline	Init party address	n/a	
Initg pty city	Initiating Party Address – City	n/a	



ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
Initg pty ID issr	Initiating Party – ID Issuer	n/a	
Initg pty postal cd	Initiating Party Address Postal Code	n/a	
Initg pty sub div	Initiating Party Address – State	n/a	
Instd agt BIC	Instructed agent BIC	Receiver	
Instd rmbrsmnt agt	Receivers Correspondent	54	
Instd rmbrsmnt agt acct	Receivers Correspondent account	54	
Instd rmbrsmnt agt address 1 Removal Group	Receivers Correspondent Address – Removal Group	54	
Instd rmbrsmnt agt address 2 Removal Group	Receivers Correspondent Address – Removal Group	54	
Instd rmbrsmnt agt adrline	Receivers Correspondent Address	54	
Instd rmbrsmnt agt adrline 1	Receivers Correspondent Address	54	
Instd rmbrsmnt agt BIC	Receivers Correspondent BIC	54	
Instd rmbrsmnt agt BIC 1	Receivers Correspondent BIC	54	
Instd rmbrsmnt agt CC	Receivers Correspondent Cntry code	54	
Instd rmbrsmnt agt CC 1	Receivers Correspondent Cntry code	54	
Instd rmbrsmnt agt ID	Receivers Correspondent NCC	54	
Instd rmbrsmnt agt ID 1	Receivers Correspondent NCC	54	
Instd rmbrsmnt agt nm	Receivers Correspondent Name	54	
Instd rmbrsmnt agt nm 1	Receivers Correspondent Name	54	
Instg agt BIC	Instructing agent BIC	Sender	
Instg rmbrsmnt agt	Instructing reimbursement agent	53	Senders Correspondent
Instg rmbrsmnt agt acct	Instructing reimbursem't agent acc't	53	Senders Correspondent
Instg rmbrsmnt agt acct IBAN	Instructing reimbursement agt IBAN	53	Senders Correspondent
Instg rmbrsmnt agt address 1 Removal Group	Instructing reimbursement agent address 1	53	Senders Correspondent
Instg rmbrsmnt agt address 2 Removal Group	Instructing reimbursement agent address 2	53	Senders Correspondent
Instg rmbrsmnt agt adrline	Instructing reimbursement agt addr	53	Senders Correspondent
Instg rmbrsmnt agt adrline 1	Instructing reimbursement agt addr 1	53	Senders Correspondent

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
Instg rmbasmnt agt BIC	Instructing reimbursement agt BIC	53	Senders Correspondent
Instg rmbasmnt agt BIC 1	Instructing reimbursement agt BIC1	53	Senders Correspondent
Instg rmbasmnt agt CC	Instructing reimbursement agent Country code	53	Senders Correspondent
Instg rmbasmnt agt CC 1	Instructing reimbursement agent Country code 1	53	Senders Correspondent
Instg rmbasmnt agt ID	Instructing reimbursement agt NCC	53	Senders Correspondent
Instg rmbasmnt agt ID 1	Instructing reimbursement agt NCC1	53	Senders Correspondent
Instg rmbasmnt agt nm	Instructing reimbursement agt name	53	Senders Correspondent
Instg rmbasmnt agt nm 1	Instructing reimbursement agt name1	53	Senders Correspondent
Instr ID	Instruction ID	20	Sender's Reference
Instr ID X	Instruction ID	20	Sender's Reference
Intrmy agnt nm	Intermediary agent 1 name	56	Intermediary Institution
Intrmy agt 2 acct	Intermediary agent 2 account	56	Intermediary Institution
Intrmy agt 2 acct BBAN	Intermediary agent 2 BBAN	56	Intermediary Institution
Intrmy agt 2 acct IBAN	Intermediary agent 2 IBAN	56	Intermediary Institution
Intrmy agt acct	Intermediary agent 1 account	56	Intermediary Institution
Intrmy agt acct BBAN	Intermediary agent 1 BBAN	56	Intermediary Institution
Intrmy agt acct IBAN	Intermediary agent 1 IBAN	56	Intermediary Institution
Intrmy agt acct ID	Intermediary agent 1 acc't number	56	Intermediary Institution
Intrmy agt acct name	Intermediary agent 1 acc't number	56	Intermediary Institution
Intrmy agt address 1 Removal Group	Intermediary agent 1 address Removal Group	56	Intermediary Institution
Intrmy agt address 2 Removal Group	Intermediary agent 1 address Removal Group	56	Intermediary Institution
Intrmy agt adrline	Intermediary agent 1 address	56	Intermediary Institution
Intrmy agt adrline 1	Intermediary agent 1 address	56	Intermediary Institution
Intrmy agt BIC	Intermediary agent 1 BIC	56	Intermediary Institution
Intrmy agt BIC 1	Intermediary agent 1 BIC	56	Intermediary Institution
Intrmy agt CC	Intermediary agent 1 country code	56	Intermediary Institution
Intrmy agt ID	Intermediary agent 1 NCC	56	Intermediary Institution
Intrmy agt2 acct ID	Intermediary agent 2 acc't number	56	PAIN 001 Intermediary Inst
Intrmy agt2 acct name	Intermediary agent 2 acc't number	56	PAIN 001 Intermediary Inst
Intrmy agt2 address	Intermediary agent 2 address	56	PAIN 001 Intermediary

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
			Inst
Intrmy agt2 address 1	Intermediary agent 2 address	56	PAIN 001 Intermediary Inst
Intrmy agt2 address 1 Removal Group	Intermediary agent 2 address Removal Group	56	PAIN 001 Intermediary Inst
Intrmy agt2 BIC	Intermediary agent 2 BIC	56	PAIN 001 Intermediary Inst
Intrmy agt2 BIC 1	Intermediary agent 2 BIC	56	PAIN 001 Intermediary Inst
Intrmy agt2 CC	Intermediary agent 2 country code	56	PAIN 001 Intermediary Inst
Intrmy agt2 ID	Intermediary agent 2 NCC	56	PAIN 001 Intermediary Inst
Intrmy agt2 NCC cd	NCC of agent2	n/a	
Intrmy agt2 nm	Intermediary agent 2 name	56	PAIN 001 Intermediary Inst
Narrative F77A	Narrative F77A	n/a	
NCC code	NCC code copy field	n/a	
Orgnl cdtr account IBAN	Original Creditor IBAN	58/59	Beneficiary Customer
Orgnl cdtr acct name	Original Creditor acc't name (group)	58/59	Beneficiary Customer
Orgnl cdtr adrline	Original Creditor address	58/59	Beneficiary Customer
Orgnl cdtr agt address Removal Group	Original Creditor agent address – Removal Group	57	Account with Institution
Orgnl cdtr agt adrline	Original Creditor agent address	57	Account with Institution
Orgnl cdtr agt BIC	Original Creditor agent BIC	57	Account with Institution
Orgnl cdtr agt CC	Original Creditor agent country code	57	Account with Institution
Orgnl cdtr agt ID	Original Creditor agent NCC	57	Account with Institution
Orgnl cdtr agt ID 1	Original Creditor agent NCC	57	Account with Institution
Orgnl cdtr agt ID 2	Original Creditor NCC	57	Account with Institution
Orgnl cdtr agt nm	Original Creditor agent name	57	Account with Institution
Orgnl cdtr agt prtry ID	Original Creditor agent Proprietary ID	57	Account with Institution
Orgnl cdtr BIC	Original Creditor BIC	58/59	Beneficiary Customer
Orgnl cdtr nm	Original Creditor name	58/59	Beneficiary Customer
Orgnl cov cdtr acct BBAN	Cover Creditor BBAN	58/59	Beneficiary Customer
Orgnl cov cdtr acct IBAN	Cover Creditor IBAN	58/59	Beneficiary Customer
Orgnl cov cdtr acct ID	Cover Creditor acc't number (group)	58/59	Beneficiary Customer
Orgnl cov cdtr acct name	Cover Creditor account name (group)	58/59	Beneficiary Customer
Orgnl cov cdtr adrline	Cover Creditor address	58/59	Beneficiary Customer
Orgnl cov cdtr agt acct	Original Cover creditor agent	57	Account with Institution

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
IBAN	IBAN		
Orgnl cov cdtr agt acct ID	Original Cover creditor agt acc't num	57	Account with Institution
Orgnl cov cdtr agt acct nm	Original Cover creditor agt acc't name	57	Account with Institution
Orgnl cov cdtr agt adrline	Original Cover creditor agent address	57	Account with Institution
Orgnl cov cdtr agt BIC	Original Cover creditor agent BIC	57	Account with Institution
Orgnl cov cdtr agt ID	Original Cover Creditor agent NCC	57	Account with Institution
Orgnl cov cdtr agt nm	Original Cover creditor agent name	57	Account with Institution
Orgnl cov cdtr BIC	Cover Creditor BIC	58/59	Beneficiary Customer
Orgnl cov cdtr Country	Cover Creditor country	58/59	Beneficiary Customer
Orgnl cov cdtr nm	Cover Creditor name	58/59	Beneficiary Customer
Orgnl cov dbtr adrline	Cover debtor address	50	Ordering Customer
Orgnl cov dbtr agt acct IBAN	IBAN of the debtor agent account	n/a	
Orgnl cov dbtr agt acct ID	Account ID of the debtor agent acc't	n/a	
Orgnl cov dbtr agt acct nm	Account name of the debtor ag't acc't	n/a	
Orgnl cov dbtr agt adrline	Original Cover debtor agent address	52	Ordering Institution
Orgnl cov dbtr agt BIC	Original Cover debtor BIC	52	Ordering Institution
Orgnl cov dbtr agt ID	Original Cover debtor agent NCC	52	Ordering Institution
Orgnl cov dbtr agt nm	Original Cover debtor agent name	52	Ordering Institution
Orgnl cov fbtr acct BBAN	BBAN of the cover debtor acc't group	n/a	
Orgnl cov fbtr acct IBAN	IBAN of the cover debtor acc't group	n/a	
Orgnl cov fbtr acct ID	Acc't ID of cover debtor acct group	n/a	
Orgnl cov fbtr acct nm	Acc't name of cover debtor acc't grp	n/a	
Orgnl cov fbtr BIC	Cover debtor BIC	50	Ordering Customer
Orgnl cov fbtr Country	Cover debtor country	50	Ordering Customer
Orgnl cov fbtr nm	Cover debtor name	50	Ordering Customer
Orgnl cov intrmy agt acct IBAN	Original Cover intermediary agt1 IBAN	56	Intermediary Institution
Orgnl cov intrmy agt acct ID	Cover intermediary agent 1 acct num	56	Intermediary Institution
Orgnl cov intrmy agt acct	Cover intermediary agent 1	56	Intermediary Institution

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
nm	acc't num		
Orgnl cov Intrmy agt adrline	Original Cover Intermediary agent addr	56	Intermediary Institution
Orgnl cov intrmy agt BIC	Original Cover intermediary agent BIC	56	Intermediary Institution
Orgnl cov intrmy agt ID	Cover intermediary agent 1 NCC	56	Intermediary Institution
Orgnl cov intrmy agt nm	Original Cover intermediary agent name	56	Intermediary Institution
Orgnl cov unstructured rmt info	Remittance data to enable matching the payment at the beneficiary end	70	For INV,IPI,RFB,TSU and proprietary codewords
Orgnl dbtr acc ccy	Orig debtor account currency	n/a	
Orgnl dbtr adrline	Original Debtor address	50	Ordering Customer
Orgnl dbtr agt address Removal Group	Original Debtor agent address	52	Ordering Institution
Orgnl dbtr agt adrline	Original Debtor agent address	52	Ordering Institution
Orgnl dbtr agt BIC	Original Debtor agent BIC	52	Ordering Institution
Orgnl dbtr agt CC	Original Debtor agent country code	52	Ordering Institution
Orgnl dbtr agt ID	Original Debtor agent NCC	52	Ordering Institution
Orgnl dbtr agt nm	Original Debtor agent name	52	Ordering Institution
Orgnl dbtr ctry sub division	Orig debtor country sub division	n/a	
Orgnl dbtr pstl cd	Orig debtor postal code	n/a	
Orgnl eqvt amt	Orig equiv amount	n/a	
Orgnl eqvt amt ccy	Orig equiv amount currency	n/a	
Orgnl eqvt amt ccy of transfer	Orig equiv amount ccy of transfer	n/a	
Orgnl Init oty country	Orig Init party country	n/a	
Orgnl Init pty adrline	Orig Init party address	n/a	
Orgnl Initg pty city	Initiating Party Address – City	n/a	
Orgnl Initg pty ID issr	Initiating Party – Identification Issuer	n/a	
Orgnl Initg pty postal cd	Initiating Party Address – Postal Code	n/a	
Orgnl Initg pty sub div	Initiating Party Address – State	n/a	
Orgnl instd agt adrline	Original Instructed agent address	Receiver	
Orgnl instd agt BIC	Original Instructed agent BIC	Receiver	
Orgnl instd agt CC	Original Instructed agent country code	Receiver	
Orgnl instd agt ID	Original Instructed agent NCC	Receiver	
Orgnl instd agt nm	Original Instructed agent	Receiver	

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
	name		
Orgnl instd rmbrsmnt agt	Original Receivers Correspondent	54	
Orgnl instd rmbrsmnt agt acct	Receivers Correspondent account	54	
Orgnl instd rmbrsmnt agt address Removal Group	Original Receivers Correspondent Address - Removal Group	54	
Orgnl instd rmbrsmnt agt address 1 Removal Group	Original Receivers Correspondent Address – Removal Group	54	
Orgnl instd rmbrsmnt agt address 2 Removal Group	Original Receivers Correspondent Address – Removal Group	54	
Orgnl instd rmbrsmnt agt adrline	Original Receivers Correspondent Address	54	
Orgnl instd rmbrsmnt agt adrline 1	Original Receivers Correspondent Address	54	
Orgnl instd rmbrsmnt agt adrline 2	Original Receivers Correspondent Address	54	
Orgnl instd rmbrsmnt agt BIC	Original Receivers Correspondent BIC	54	
Orgnl instd rmbrsmnt agt BIC 1	Original Rec Correspondent BIC 1	54	
Orgnl instd rmbrsmnt agt BIC 2	Original Rec Correspondent BIC 2	54	
Orgnl instd rmbrsmnt agt CC	Original Rec Corresp Country code	54	
Orgnl instd rmbrsmnt agt CC 1	Original Rec Corresp Country code 1	54	
Orgnl instd rmbrsmnt agt CC 2	Original Rec Corresp Country code 2	54	
Orgnl instd rmbrsmnt agt ID	Original Rec Correspondent NCC	54	
Orgnl instd rmbrsmnt agt ID 1	Original Rec Correspondent NCC 1	54	
Orgnl instd rmbrsmnt agt ID 2	Original Rec Correspondent NCC 2	54	
Orgnl instd rmbrsmnt agt nm	Original Rec Correspondent Name	54	
Orgnl instd rmbrsmnt agt nm 1	Original Rec Correspondent Name 1	54	
Orgnl instd rmbrsmnt agt nm 2	Original Rec Correspondent Name 2	54	
Orgnl Instg agt address Removal Group	Original Instructing agent address- Removal Group	Sender	
Orgnl instg agt address 1 Removal Group	Original Instructing agent address- Removal Group	Sender	

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
Orgnl instg agt address 2 Removal Group	Original Instructing agent address- Removal Group	Sender	
Orgnl Instg agt adrline	Original Instructing agent address	Sender	
Orgnl Instg agt BIC	Original Instructing agent BIC	Sender	
Orgnl instg agt CC	Original Instructing agt country code	Sender	
Orgnl Instg agt ID	Original Instructing agent NCC	Sender	
Orgnl Instg agt nm	Original Instructing agent name	Sender	
Orgnl instg rmbrsmnt agt	Original Senders Correspondent	53	
Orgnl instg rmbrsmnt agt address 1 Removal Group	Original Senders Correspondent Address- Removal group	53	
Orgnl instg rmbrsmnt agt address 2 Removal Group	Original Senders Correspondent Address - Removal Group	53	
Orgnl Instg rmbrsmnt agt address Removal Group	Original Senders Correspondent Address - Removal Group	53	
Orgnl instg rmbrsmnt agt adrline	Original Senders Correspondent Addr	53	
Orgnl instg rmbrsmnt agt adrline 1	Original Senders Corresp Addr 1	53	
Orgnl instg rmbrsmnt agt adrline 2	Original Senders Corresp Addr 2	53	
Orgnl instg rmbrsmnt agt BIC	Original Senders Correspondent BIC	53	
Orgnl instg rmbrsmnt agt BIC 1	Original Senders Correspondent BIC 1	53	
Orgnl instg rmbrsmnt agt BIC 2	Original Senders Correspondent BIC 2	53	
Orgnl instg rmbrsmnt agt CC	Orig Senders Corresp Country code	53	
Orgnl instg rmbrsmnt agt CC 1	Orig Senders Corresp Country code	53	
Orgnl instg rmbrsmnt agt ID	Original Senders Correspondent NCC	53	
Orgnl instg rmbrsmnt agt ID 1	Orig NCC – Instructing Rmbrsmnt Agt	n/a	
Orgnl instg rmbrsmnt agt nm	Original Senders CorrespName	53	
Orgnl Instg Rmbrsmnt agt nm1	Orig name Instructing Rmbrsmnt Agt	n/a	
Orgnl intrmy agt address	Original Intermediary agent 1 address	56	Intermediary Institution

ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
Orgnl intrmy agt BIC	Original Intermediary agent BIC	56	Intermediary Institution
Orgnl intrmy agt CC	Orig Intermediary agt 1 country code	56	Intermediary Institution
Orgnl intrmy agt ID	Original Intermediary agent 1 NCC	56	Intermediary Institution
Orgnl intrmy agt nm	Original Intermediary agent name	56	Intermediary Institution
Orgnl intrmy agt2 NCC cd	Orig NCC of agent2	n/a	
Orgnl sttlm time	Payment orig settlement time request	n/a	
Orgnl thrd rmbrsmnt agt adrline	Original 3rd Rmbrsmnt Agent Address	55	
Orgnl thrd rmbrsmnt agt BIC	Original 3rd Rmbrsmnt Agent BIC	55	
Orgnl thrd rmbrsmnt agt CC	Orig 3rd Rmbrsmnt Agt Country code	55	
Orgnl thrd rmbrsmnt agt ID	Original 3rd Rmbrsmnt Agent NCC	55	
Orgnl thrd rmbrsmnt agt nm	Original 3d Rmbrsmnt Agent Name	55	
Orgnl unstructured rmt info	Remittance data to enable matching the payment at the beneficiary end	70	For INV,IPI,RFB,TSU and proprietary codewords
Prev Instructing agt BIC	Agent BIC immediately prior to the instructing agent (for codeword INS)	72	
Prev Instructing agt nm	Agent name immediately prior to the instructing agent (for codeword INS)	72	
Prtry msg	Proprietary Message	n/a	
Std instr nxt agt cd	Standard instruction for next agent	72	For codewords INT & REC
Std instr nxt agt inf	Standard instruction for next agent	72, 23E	For codewords INT, PHON, TELE, PHOI and TELI
Sttlm acct IBAN	IBAN of the settlement account group	n/a	
Sttlm acct ID	Account ID of the Settlement account	n/a	
Sttlm time request	Payment settlement time request	n/a	
Thrd rmbrsmnt agt adrline	3rd Reimbursement Inst Address	55	
Thrd rmbrsmnt agt CC	3rd Reimbursement Inst Cntry code	55	
Thrd rmbrsmnt agt nm	3rd Reimbursement Institution Name	55	



ISO 20022 Field Name	ISO Description	SWIFT	Swift Description
Unstructured rmt info	Remittance data to enable matching the payment at the beneficiary end	55	For INV,IPI,RFB,TSU and proprietary codewords

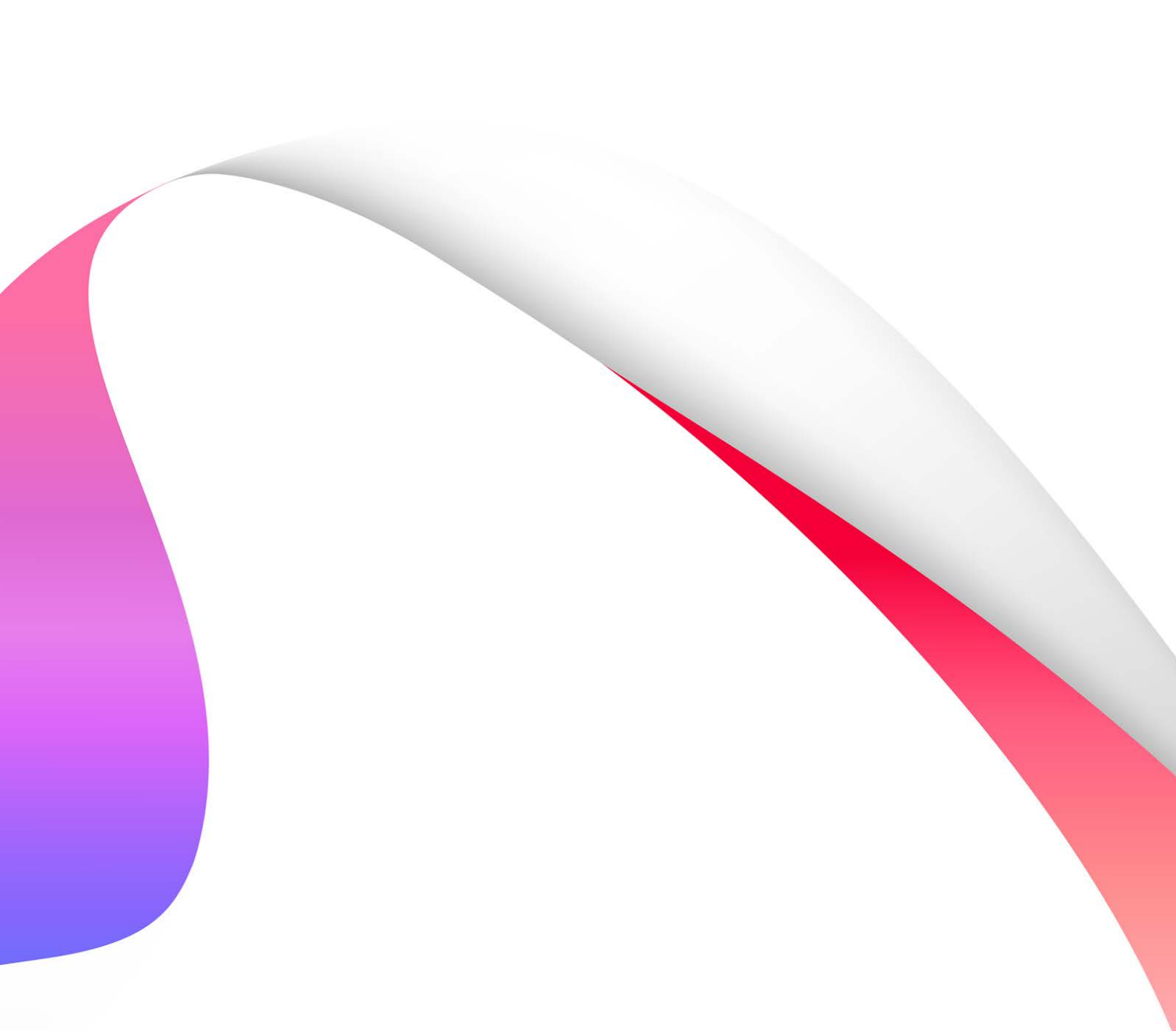
## Appendix B: Example of a Compliance Request

```
-- Webpage Dialog
<?xml version="1.0" encoding="UTF-8" ?>
<DATA xmlns="http://www.nbg.gr/Online/LEGACY/">
  - <OFAC_REQUEST LIST_NAME="OFAC_1" MID="13C5H13231DX0A30" EXIT_POINT="PREPOSTING">
    <FIELDS NAME="X_DBTR_AGT_BIC_2AND" VALUE="BKCHCNBJ44A" />
    <FIELDS NAME="X_CDTR_AGT_BIC_2AND" VALUE="WPACAU2FXXX" />
    <FIELDS NAME="X_CDTR_AGT_CTRY_2AND" VALUE="AU" />
    <FIELDS NAME="X_CDTR_AGT_ID_2AND" VALUE="032938" />
    <FIELDS NAME="X_CDTR_ACCT_ID" VALUE="10353521" />
    <FIELDS NAME="X_CDTR_ACCT_NM" VALUE="SISI WAN" />
    <FIELDS NAME="X_DBTR_NM" VALUE="CHEN GUOLAN" />
    <FIELDS NAME="OC_DBTR_AGT_BIC" VALUE="BKCHCNBJ44A" />
    <FIELDS NAME="X_INSTG_RMB_AGT_BIC_2AND" VALUE="BKCHCNBJXXX" />
    <FIELDS NAME="X_F72_EXIST" VALUE="TRUE" />
    <FIELDS NAME="X_DBTR_ACCT_ID" VALUE="649657559260" />
    <FIELDS NAME="X_INSTG_AGT_BIC_2AND" VALUE="BKCHAU2SXXX" />
    <FIELDS NAME="OC_INSTG_RMB_AGT_BIC" VALUE="BKCHCNBJXXX" />
    <FIELDS NAME="X_CDTR_NM" VALUE="SISI WAN" />
    <FIELDS NAME="P_CDT_ACCT_CCY" VALUE="AUD" />
    <FIELDS NAME="P_CDT_MOP" VALUE="PDS" />
    <FIELDS NAME="P_DBT_ACCT_CCY" VALUE="AUD" />
    <FIELDS NAME="P_DBT_MOP" VALUE="SWIFT" />
    <FIELDS NAME="P_DEPARTMENT" VALUE="AUD" />
    <FIELDS NAME="P_MID" VALUE="13C5H13231DX0A30" />
    <FIELDS NAME="P_MSG_TYPE" VALUE="SWIFT_103" />
    <FIELDS NAME="P_OFFICE" VALUE="AU1" />
    <FIELDS NAME="P_PROC_DT" VALUE="2012-09-15" />
    <FIELDS NAME="P_PRODUCT_CD" VALUE="DEF" />
    <FIELDS NAME="P_INSTR_ID" VALUE="kuku1251" />
    <FIELDS NAME="OC_CDTR_AGT_BIC" VALUE="WPACAU2FXXX" />
    <FIELDS NAME="OC_CDTR_AGT_CTRY" VALUE="AU" />
    <FIELDS NAME="OC_CDTR_AGT_ID" VALUE="032938" />
    <FIELDS NAME="OC_INSTD_AGT_BIC" VALUE="BKCHAU2SXXX" />
    <FIELDS NAME="OC_INSTG_AGT_BIC" VALUE="BKCHCNBJ400" />
    <FIELDS NAME="X_MSG_USER_REF" VALUE="BOCIPAY-RT" />
    <FIELDS NAME="P_ORIG_INSTR_ID" VALUE="kuku1251" />
    <FIELDS NAME="X_STTLM_AMT" VALUE="10000.00" />
    <FIELDS NAME="X_STTLM_CCY" VALUE="AUD" />
    <FIELDS NAME="X_STTLM_DT_1B" VALUE="2012-09-15" />
    <FIELDS NAME="X_INSTR_NXT_AGT" VALUE="ID 360121196503285228 概概概概" />
    <FIELDS NAME="X_INSTR_ID" VALUE="kuku1251" />
    <FIELDS NAME="X_DBTR_ADRLINE" VALUE="ZHONGSHAN GONGYUAN YOULECHANG" />
  </OFAC_REQUEST>
</DATA>
```

## Appendix C: Glossary of Terms

The table below provides a glossary of terms used in this document.

Term	Description
AML	Anti-Money Laundering
GI	Global Interdict
GPP	Global PAYplus
Office of Foreign Assets Control (OFAC)	For information about the OFAC and its functions, see: <a href="http://www.ustreas.gov/offices/enforcement/ofac/">http://www.ustreas.gov/offices/enforcement/ofac/</a>
SDN	Specially designated nationals
Specially Designated Nationals (SDN) List	For information about the SDN list, see: <a href="http://www.ustreas.gov/offices/enforcement/ofac/sdn/">http://www.ustreas.gov/offices/enforcement/ofac/sdn/</a> Specially designated nationals
STP	Straight through processing. Automated processing where operator intervention is not required from the time the payment drops into the system until payment processing is completed.



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**Registered in England & Wales**  
No. 01360027

**Registered Office**  
4 Kingdom Street Paddington  
London W2 6BD

