

# OFAC<sup>1</sup> Compliance Policy

## Background

### Purpose

The purpose of this policy is ensure that the IETF Administration LLC (IETF LLC) complies with the requirements of the Code of Conduct relating to the US Office of Foreign Assets Control<sup>2</sup> (OFAC). This policy provides guidance to the IETF LLC board, staff and contractors regarding the management of contracts and the processing of financial transactions.

### Legal and Policy Compliance

As a US registered corporation, the IETF LLC is obliged to comply with OFAC requirements.

The Code of Conduct requires that we screen all persons and companies that we are proposing to enter into a contract or transaction with, against the publicly accessible OFAC lists.

This policy details when and how to conduct such screening.

## Screening Requirements

### General Process

The general process is for the name and address details of any persons and companies that we are proposing to enter into a contract or transaction with, to be checked in two ways:

1. If an associated country is Belarus, Crimea region of Ukraine, Cuba, Iran, Myanmar, North Korea, Russia or Syria, then the IETF Executive Director must be alerted.

---

<sup>1</sup> US Office of Foreign Assets Control

<sup>2</sup>

<https://home.treasury.gov/policy-issues/office-of-foreign-assets-control-sanctions-programs-and-information>

2. The name (and if needed, the address and country details) must be checked against the OFAC sanctions list search<sup>3</sup> which includes its list of Specially Designated Nationals and Blocked Persons and other sanctions lists administered by OFAC. OFAC's web-based search allows users to search by name, address, or ID number. If any matches, or near matches are identified, then the IETF Executive Director must be alerted.

## Meeting Registrations

The current automated meeting registration system can continue, but at regular intervals, and no later than 30 days before the meeting begins, the list of registered participants and financial institutions associated with payment of registration fees must be checked (both for individual names and country of domicile and residence).

## Other Contractual Relationships

For all proposed contractual relationships (a services agreement, partnership, sponsorship, etc) except meeting registrations, the full name, address and country of residence or domicile of the counterparty must be identified and checked against the OFAC sanctions list search.

In the event of a match or near match, the IETF Executive Director must be alerted and the contractual relationship must not be entered into until the IETF Executive Director gives explicit permission.

## Action

The IETF Executive Director will work with IETF LLC counsel to determine what action to take in each individual case. This may include not pursuing the contractual relationship, revoking the meeting registration, canceling any existing contract or other action.

---

<sup>3</sup> <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>