

Important Note to User: This sample policy is not a “one-size-fits-all” and should not be used by any organization without review and modification to fit the needs of such organization. Organizations should cross-reference with relevant existing policies where appropriate, comparing against relevant policies (e.g. mobile device and acceptable use policies), ensuring terms are defined consistently across policies. Additional changes to this policy may be necessary to account for varying organizational security needs and user privacy expectations. In addition, while efforts have been made to ensure that the terms of this policy comply with employee rights under the National Labor Relations Act, this is a contentious and ever-changing area of the law, and therefore total compliance cannot be guaranteed. **Delete this note before publishing.**

Sample Wire Fraud Reduction Policy

Establishment date, effective date, and revision procedure

This policy was established and approved by [Law Firm Name] on [mm,dd,yyyy]. The [Law Firm Name] shall review this policy at least once a year, and at any additional time when there are changes that may affect firm operation..

Table of revision history

Version	Date	Details of change	Issued by	Approved by

Purpose

The purpose of this policy is to establish procedures related to wire transfers originating from and depositing into [Law Firm Name] operating and Client Trust bank accounts. These procedures are designed to reduce or eliminate the risk of wire transfer fraud and the losses suffered as a result of being a wire transfer fraud victim.

Scope

This policy applies to all [Law Firm Name] employees.

Definition:

Wire-transfer fraud is when [Law Firm Name] employees are deceived and wire money to a bank account controlled by persons other than the intended recipients.

Policy

This policy requires that procedures be established for outgoing and incoming wire payments to reduce the likelihood that wire transfer fraud is perpetuated on *[Law Firm Name]* employees.

These procedures must include the following.

- Establish specific wire instructions with any new business partner who may receive wire payments from *[Law Firm Name]*. These instructions must include the contact information of a designated individual or department at the business partner that can be reached to confirm a wire or a wire transfer change request. At the same time, *[Law Firm Name]* shall provide the business partner with similar contact information.
- Independently verify over the phone all wire transfer requests and changes to wire instructions using a known and trusted phone number — not one from the current wire transfer request. The contact information provided in the request must not be used to verify the request.
- Consummate (?) all wire transfers and any new instructions or changes to existing wire instructions with dual control (e.g. two employees).
- Designate employees who are authorized to send wire transfers. All other employees are prohibited from wiring payments.
- Treat all changes to wire instructions and urgent requests to wire funds with skepticism and presume them fraudulent until verified for authenticity.
- Establish procedures for reporting suspected fraudulent wire transfer requests so that other employees may be alerted to the scam.
- Verify with *[Law Firm Name]* bank to confirm both the account number and the name on the account before sending a wire.
- Establish internal procedures for any internal requests to wire funds or change wire instructions and train employees accordingly.

WIRE FRAUD TRAINING AND AWARENESS PROGRAM

This policy requires that an employee wire fraud education and awareness training program be established. This training shall include periodic training so that employees can understand and detect wire transfer scams.

The training shall include instructions on:

- How to closely inspect all emails related to wire transfers for signs of fraud;
- The relevant procedures created as a result of this policy;
- How to report suspected wire fraud requests;
- How and when (immediately) to report any fraudulent payments; and

- Any other items that [Law Firm Name] determines will help reduce the risk of [Law Firm Name] being victimized by wire fraud.

The program shall also include periodic reminders to employees of the ongoing risk of wire fraud and ensure employees are following proper procedures.

REPORTING PROCEDURES

This policy requires that procedures be established and followed if [Law Firm Name] has been the victim of wire fraud.

These procedures may include:

- Notify the receiving bank and request that a freeze be placed on any remaining funds.
- Notify [Law Firm Name]'s cyber insurance carrier.
- Notify [Law Firm Name]'s Professional Liability insurance carrier.
- Notify law enforcement after seeking advice of counsel.
- Investigate whether [Law Firm Name] email system may have been compromised.
- Ask business partners to investigate whether their email systems may have been compromised.
- Any other items that [Law Firm Name] determines will help reduce the risk of [Law Firm Name] being victimized by wire fraud.

Policy Compliance

Compliance Measurement

Compliance with this policy will be verified by the [Law Firm Name] through various methods, including but not limited to, business tool reports, internal and external audits, and feedback to the [Policy Owner].

Exceptions

Any exception to the policy must be approved by the [Policy Owner] in advance.

Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

By signing below, I acknowledge that I have read and fully understand my obligations under this Policy and hereby agree to abide by its terms.

Name

Date