



Partner Housing Australasia (Building) Incorporated  
ABN 88 722 057 429 CFN: 15429  
Web: [www.partnerhousing.org](http://www.partnerhousing.org)  
Pro-bono professional services and funding for South Pacific  
village infrastructure, housing, water, sanitation and training.

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Partner Housing is a signatory to the ACFID Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability and integrity.

## Anti-terrorism



### Basis

These policies and procedures set out the means of complying with the requirements of the "Constitution, Policies & Code of Conduct" of Partner Housing Australasia (Building) Incorporated.

### Signed

Rod Johnston  
President / CEO / Public Officer  
Partner Housing Australasia (Building) Incorporated

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## Revisions

P21010119-1 1 February 2022

Correction of minor typographical errors and minor modifications  
Change of name throughout to “Partner Housing Australasia”

## **Policy**

### **94. Anti-terrorism**

- (a) Partner Housing Australasia shall ensure that its activities do not contribute in any way to, either directly or indirectly, to the spread of terrorism.
- (b) Partner Housing Australasia shall not participate in political activism or terrorism.
- (c) Partner Housing Australasia shall not participate with organisations involved in political activities or the like, or any organisation that could be that could be associated directly or indirectly with terrorism.
- (d) The implementation, reporting and monitoring compliance with this policy shall be as set out in the “Procedures”.

## **Procedures**

### **Policy**

1. The Organisation shall ensure that its activities do not contribute in any way to, either directly or indirectly, to the spread of terrorism.
2. The Organisation shall not participate in political activism or terrorism.
3. The Organisation shall not participate with organisations involved in political activities or the like, or any organisation that could be that could be associated directly or indirectly with terrorism.
4. The implementation, reporting and monitoring compliance with this policy shall be as set below and the “Constitution, Policies & Code of Conduct” and “Procedures”.

### **Responsible Personnel**

All personnel have a responsibility to ensure that the Policy and Procedures are observed.

The personnel with specific tasks designated in the position descriptions, and/or most likely to be involved in implementation are Chief Executive Officer, Resource Development Manager, Regional Managers and Project Managers.

### **Context**

Partner Housing Australasia’s principal mission is in designing and building "simple, decent, affordable" housing and those minor buildings and infrastructure that relate directly to the improvement of the daily lives of poor people in villages in developing countries. This includes:

- Houses
- Village community centres
- Village schools
- Village clinics
- Access roads to the above
- Water collection (e.g. wells & tanks) and reticulation to the above
- Septic systems and latrines to the above
- Hospitals

### **Client Organisations**

The pro-bono design & documentation work, and building work, undertaken by Partner Housing Australasia, is provided to well-established non-government organisations that are involved only in humanitarian activities listed in “Scope”.

### **Risk of Contact with Terrorists**

The normal Partner Housing Australasia activities are unlikely to bring the organisation or its members and volunteers into contact with terrorists or terrorist organisations.

### **Procedures to Eliminate Contact with Terrorists**

The procedures for implementing and managing this policy include:

- Only contract with, or provide funds to, organisations; and not to individuals.
- Ensure Partner Organisations are well-known and are reputable, and have key development goals and terrorism policies in alignment with Partner Housing Australasia and its policies.

- When establishing working arrangements, Contracts and/or Memoranda of Understanding with client NGOs, obtain and assurance and a copy of their Terrorism Policy.
- Accounts shall be audited by Australian Auditors and records shall be available for review. All donations shall be listed in financial statements provided at Annual General Meetings, including bank account name. Ensure that finances are not being directed towards individuals or organisations known to be involved in terrorism.
- Be cognisant during review of on-site evidence (whether in person or through emails, photographs etc) to be aware of the existence of terrorism, and report any suspicious behaviour as appropriate.

The Senior Volunteer shall be alert for and report noncompliance or terrorism activity.

The means of reporting shall be in the format set out in Project File (see sample in Appendix 4 of these Procedures).

If an instance of terrorism is detected, the Senior Volunteer shall raise it with the Regional Manager and Chief Executive Officer, who shall notify DFAT and, if appropriate, implement procedures to terminate the MOU.

- Use the internet to search the DFAT and Asian Development Bank registers of proscribed and terrorist organisations.

The Anti-terrorism Policy shall be distributed to all Directors and Regional Managers and reviewed in the context of this and other projects at each February Board Meeting. A report on DFAT and Internet searches of Terrorism in the context of the Partner Organisation and any known noncompliance shall be presented to the February Board Meeting.

#### Proscribed Lists

- [DFAT Consolidated List \(DCL\)](#)
- [Asian Development Bank Sanctions List \(ADB\).](#)

#### Other Relevant Lists

- [World Bank Listing of Ineligible Firms and Individuals \(WBL\)](#)
- [List of Terrorist Organisations \(LTO\)](#)

[http://www.dfat.gov.au/divs/ild/download\\_lms.html](http://www.dfat.gov.au/divs/ild/download_lms.html)

<http://www.dfat.gov.au/international-relations/security/counter-terrorism/Pages/dealings-with-terrorists-information-for-australians-and-australian-businesses.aspx>

To carry out the DFAT check, use Link Match Lite program  
C:\Users\user\Downloads\LinkMatchLite (2).zip



- A Memorandum of Understanding, including the relevant policy, shall be signed by each Partner Organisation.
- An Australian Federal Police check of each overseas volunteer shall be obtained.

### ACFID Advice on behalf of DFAT

#### **1. What are the sanctions and other lists to be checked and which individuals and organisations need to be checked?**

The four lists to be checked are:

- [Asian Development Bank Sanctions List;](#)
- [World Bank Listing of Ineligible Firms and Individuals;](#)
- [The Australian Government's Listed Terrorist Organisations; and](#)
- [The DFAT Consolidated List.](#)

Grant recipients are responsible for identifying and checking the following individuals and organisations directly involved in the Friendship Grant Activity against the four lists:

- [grant recipient's staff and volunteers;](#)

- *in-country partner(s);*
- *in-country partner(s) staff and volunteers;*
- *in-country partner(s) main suppliers\*;* and
- *any other organisations or individuals directly involved in the delivery of the Friendship Grant Activity.*

*\*It is the organisation's responsibility to determine main suppliers. Organisations may wish to consider main suppliers as those third parties regularly involved in the organisation's operations and activities.*

*Should a direct match on any of the lists be identified, then the grant recipient must immediately notify DFAT. Organisations, staff and volunteers should be checked against the lists before they engage in the delivery of the Friendship Grant Activity.*

*DFAT recommends all organisations and individuals be rechecked against all four lists every 12 months at a minimum.*

## **2. What record should be kept when checking the lists?**

*Grant recipients are required to maintain a record of all organisations and individuals checked against the four lists. The record should include:*

- *name of individual;*
- *date of birth;*
- *name of organisation;*
- *which list(s) checked; and*
- *date checked.*

*A simple template to record these details is attached to the email.*

## **3. How do we know what countries are at a higher risk than others for managing terrorism financing?**

*The open-source resources [Global Terrorism Database \(GTD\)](#) and the [Global Terrorism Index](#) can be used as to provide further context and to identify countries which are at higher risk in terms of managing terrorism financing.*

*For further information about understanding and managing terrorism financing risks, we have attached the DFAT produced [Disrupting Terrorism Financing Quick Reference Guide](#).*

*A further Q&A resource produced by the Attorney General Department on [Australia's counter-terrorism laws](#) is also recommended.*

## **4. What parts of the agreement are you responsible for ensuring your downstream or in-country partners abide by?**

*If any DFAT provided Friendship Grant funds are to be expended in conjunction with, or by, an in-country partner or third-party entity, then all parties are obliged to expend these funds in accordance with all relevant clauses of the signed Friendship Grant agreement.*

*To formalise this arrangement, the relevant clauses from the Friendship Grants agreement could be included as an addendum to any written arrangements your organisation has in place with an in-country partner(s) or other entities.*

*Relevant clauses include those listed under Clause 3 Recipient Obligations as well as any clauses which provide for compliance by the agents and subcontractors of the recipients, such as those obligations detailed in Clause 11 Counter Terrorism, Clause 12 Anti-Corruption and Clause 13 Child Protection.*

## **5. What checks should be done when recruiting in-country?**

*DFAT expects grant recipients and their in-country implementing partners to have appropriate staff recruitment policies and procedures in place. When recruiting in-country, referee and police checks are required, just as they would be in Australia.*

*DFAT acknowledges there may be situations where it may not be appropriate or possible to undertake formal police checks of potential staff. In those situations, DFAT recommends the potential employee or volunteer be requested to provide a wide range of personal referees and thorough checks are undertaken. It is important to document referee checks and maintain on file.*

## [DFAT Advice 22/12/2021](#)

[Australia and sanctions](#) | Australian Government Department of Foreign Affairs and Trade ([dfat.gov.au](#)).

### [Australia and sanctions](#)

#### News

- [LinkMatchLite: Technical issues resolved](#)

*An updated version of the LinkMatchLite software is now available for download.*

22 December 2021

#### **Category**

*International relations*

[Read more](#)

- [Autonomous Sanctions Amendment \(Magnitsky-style and Other Thematic Sanctions\) Regulations 2021](#)

*The Autonomous Sanctions Amendment (Magnitsky-style and Other Thematic Sanctions) Regulations 2021 (the Regulations) came into force on 21 December 2021, following the Autonomous Sanctions Amendment (Magnitsky-style and Other Thematic Sanctions) Act 2021 commencing on 8 December 2021.*

21 December 2021

#### **Category**

*International relations*

[Read more](#)

- [Autonomous Sanctions Amendment \(Magnitsky-style and Other Thematic Sanctions\) Act 2021](#)

*The Autonomous Sanctions Amendment (Magnitsky-style and Other Thematic Sanctions) Act 2021 (the Act) commenced on 8 December 2021.*

8 December 2021

#### **Category**

*International relations*

[Read more](#)

- [United Nations sanctions updates](#)

*United Nations sanctions updates on the implementation of new United Nations Security Council Resolutions and updates on Lebanon, Mail and Somalia.*

8 October 2021

#### **Category**

*International relations*

[Read more](#)

***As of 1 January 2020, DFAT established the Australian Sanctions Office (ASO). As part of this establishment, we have rolled out changes to the website and launched our new sanctions platform, [Pax](#).***

### **Who we are**

*What we do, the approach we take and our partners.*

### **Who we are**

### **What you need to know**

*What are sanctions, who must comply and details of our sanction regimes.*

### **What you need to know**

### **What you need to do**

*Your responsibilities and a checklist to assist you.*

### **What you need to do**

### **What we can do to help**

*Services we provide, sanctions permits and helpful information.*

### **What we can do to help**

## **Training**

Members, Directors, Volunteers and Partner organisations shall be made aware of this policy and these procedures, by:

- Tabling and discussing them at the AGM;
- Tabling and discussing them at the February Board Meeting (as part of the training package);
- Including them with any brief provided to volunteers, contractors or other personnel working on behalf of the organisation. (Partner Housing Australasia is a voluntary organisation and does not employ staff); and
- Including them with any Memorandum of Understanding with Partner Organisations.

### **Review of Policies and Procedure**

This policy, and the associated procedures, shall be reviewed annually at the February Board Meeting, as part of the scheduled general policy review.

## **Record of Check**

Name of Individual	Date of Birth	Name of Organisation	Lists Checked					Date Checked	Name of Checking Officer
			(1) DCL	(2) LTO	(3) WBL	(4) ADB	DFAT MatchLit		
Herrick Bruce Ragoso		Nil	No match	No match	Could not run	No match	No match	29/01/2020	Rod Johnston
Peter Woperies		Nil	No match	No match	Could not run	No match	No match	29/01/2020	Rod Johnston
Stanley Rumae		Nil	No match	No match	Could not run	No match	No match	29/01/2020	Rod Johnston
Isana Bruce		Nil	No match	No match	Could not run	No match	No match	29/01/2020	Rod Johnston
Ambrose Runi		Nil	No match	No match	Could not run	No match	No match	29/01/2020	Rod Johnston
Anthony Brad Ohoau		Nil	No match	No match	Could not run	No match	No match	29/01/2020	Rod Johnston



## Additional Information

<https://dfat.gov.au/international-relations/security/sanctions/pages/consolidated-list.aspx#reporting>

### Consolidated List

The Consolidated List is a list of all persons and entities who are subject to targeted financial sanctions or travel bans under Australian sanctions laws. We maintain the Consolidated List and update it regularly.

ON THIS PAGE

[The Consolidated List](#)

[Receiving updates to the Consolidated List](#)

[Implementation of Targeted Financial Sanctions](#)

[LinkMatchLite](#)

[Reporting to the Australian Federal Police](#)

[Australian Federal Police assistance to find a match](#)

[Application to use or deal with frozen assets](#)

[Wrongly frozen assets](#)

### The Consolidated List

Updated 7 January 2020

The Consolidated List includes all persons and entities to which the Charter of the United Nations Act 1945 and the Autonomous Sanctions Act 2011 currently applies. This follows the transition of Australia's targeted financial sanctions from the Banking (Foreign Exchange) Regulations 1959 to the Autonomous Sanctions Regulations 2011.

### Download

[Consolidated List \[XLS 2 MB\]](#)

### Receiving updates to the Consolidated List

We maintain a mailing list for people interested in receiving updates on Australian sanction laws, including updates to the Consolidated List.

Email address:

Your name (optional):

Your organisation (optional):

If you are already subscribed to the mailing list you can [unsubscribe](#).

Your email address will only be used for the purpose of receiving updates to Australian sanction laws. We will not use your email address for any other purpose or share it without your consent. For more information see our [privacy statement](#).

### Implementation of Targeted Financial Sanctions

A number of sanctions regimes make it a criminal offence to, among other things:

use or deal with the assets of a designated person or entity; or

make an asset available to, or for the benefit of, a designated person or entity.

The penalty for these offences is:

for individuals, a maximum 10 years' imprisonment and a fine the greater of \$425,000 or three times the transaction value; and

for bodies corporate, a fine the greater of \$1.7 million or three times the transaction value (the offence is a strict liability offence for bodies corporate)

## **LinkMatchLite**

The LinkMatchLite (LML) software is designed to assist asset holders in finding possible matches between their clients' names and names on the Consolidated List.

LML does not indicate whether there are any relationships between the name provided and any name on the Consolidated List. It is only designed to provide an indication of how similar the name provided is to any name on the Consolidated List to mitigate the difficulties faced by subtle name variations and aliases.

Before using this software, users should note:

the important licence information in the manual;

that this is only one method and will miss some variations;

that it requires input data in a specific format;

that the internal lists are only valid until superseded; and

that users must agree to the conditions of use.

If you want a copy of this software, email us at [asset.freezing@dfat.gov.au](mailto:asset.freezing@dfat.gov.au) and we will direct you to the download site.

## **Reporting to the Australian Federal Police**

Regulation 42 of the Charter of the United Nations (Dealing with Assets) Regulations 2008 and regulation 24 of the Autonomous Sanctions Regulations 2011 require asset holders to provide the Australian Federal Police with specific information about freezable or controlled assets, as defined under that legislation.

Please see the following legislation:

[Autonomous Sanctions Regulations](#)

[Charter of the United Nations \(Dealing with Assets\) Regulations](#)

## **Australian Federal Police assistance to find a match**

As it may not always be clear whether there is a match between the name provided and any name on the Consolidated List, asset holders may request the assistance of the Australian Federal Police (AFP) to determine whether or not an asset is owned or controlled by a person or entity on the Consolidated List.

To facilitate this process, a referral process has been agreed between DFAT, the AFP and asset holders represented by the Australian Bankers' Association and the major banks

The relevant [referral form to the AFP](#) can be downloaded, printed and filled out with:

as much information about the asset, including information about its owner or controller, as is known to the asset holder, and

the asset holder's contact details.

The referral form should be sent to the AFP at the following address:

AFP Operations Coordination Centre

e-mail: [A OCC-Client-Liaison@afp.gov.au](mailto:A OCC-Client-Liaison@afp.gov.au)

Fax: (02) 6126 7900

Phone: (02) 6126 7133

## **Application to use or deal with frozen assets**

Applications to use or deal with frozen assets, or to make assets available to designated persons or entities, must be made using the [Online Sanctions Administration System \(OSAS\)](#).

## **Wrongly frozen assets**

The responsibility to freeze an asset subject to targeted financial sanctions rests with the person or entity that holds the asset, for example the financial institution that holds the funds.

If you consider that an asset that you directly or indirectly own or control has been frozen in error, please contact the asset holder in the first instance. If, following contact with the asset holder, you continue to consider that the asset has been frozen in error, please contact:

Director

Sanctions Section

R G Casey Building  
John McEwen Crescent  
Barton ACT 0221  
Australia

or e-mail [sanctions@dfat.gov.au](mailto:sanctions@dfat.gov.au) providing:

*your full name and contact details;*

*the details of the asset and asset holder, including details of your legal or other interest in the asset);*

*details of your contact with the asset holder; and*

*the reasons for your belief that the asset has been frozen in error*



## Disrupting Financing Terrorism Quick Reference Guide

The Department of Foreign Affairs and Trade (DFAT) is committed to disrupting terrorism financing. For more information on DFAT's position, see [Financing of Terrorism Risk Management Statement](#) at [www.dfat.gov.au](http://www.dfat.gov.au). This factsheet is for funding recipients seeking guidance on managing terrorism financing risks. Funding recipients are any person or organisation in receipt of DFAT funds. For example, contractors, grant recipients, subcontractors, sub-grantees, suppliers and implementing partners.

Terrorism financing is any form of support conducted by persons who, or organisations that, encourage, plan or engage in terrorism. It includes providing assets to a person or organisation associated with terrorism. Terrorism financing means supporting any costs associated with terrorist acts. For example, travel expenses, explosive materials, weapons or vehicles. It also means supporting the less obvious parts of a terrorist organisation's operations. For example, paying for terrorists' living expenses, training or propaganda activities.

Terrorists use many means to finance their operations. This includes legitimate means, such as charities and donations, or illegitimate means, such as fraud, money-laundering, kidnapping for ransom and extortion. It can be difficult to detect terrorism financing because it is covert in nature. Many organisations are not aware that their assets are being misused by terrorists.

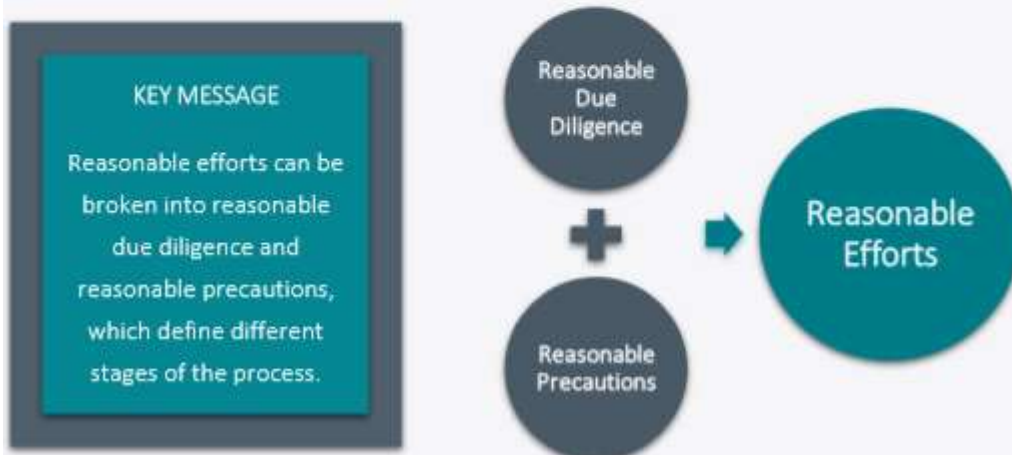
The terrorism financing process usually involves the following three stages.





## Reasonable Efforts

Funding recipients should use reasonable efforts to manage terrorism financing risks. Reasonable efforts can be broken into two stages: due diligence and precautions. Due diligence is done before employing a person or entering into an agreement with a person or organisation. For countries susceptible to terrorism, due diligence is done more regularly (for example, annually). Reasonable precautions are controls that manage risks, and apply throughout the lifespan of any agreement.



'Reasonableness' is often defined with a framework of adequately identifying risks, and responding proportionately to those risks. In other words, reasonable efforts are the level of investment needed to manage the risks. The lower the risk, the less controls are needed to manage the risk. The higher the risk, a stronger control environment is needed to manage the risk. While the risk management approach is unique to each organisation, risk management generally involves the following six stages.



## Reasonable Due Diligence



Terrorism financing risks differ depending on the context. Context means where the activity is taking place, and the type of activity. Funding recipients should identify the context before deciding on the types of risks, and the level of risk. In general, terrorism financing risks increase in places of conflicts. To establish the context, some key questions to ask are:

- What are the main terrorist organisations?
- What are the main methods for financing terrorism?
- How are funds and assets used?
- Who are the associates?
- Who is the end beneficiary?

To help identify the context, see:

- Global Terrorism Database  
<http://www.start-dev.umd.edu/gtd/>
- Global Terrorism Index  
<http://visionofhumanity.org/app/uploads/2018/12/Global-Terrorism-Index-2018-1.pdf>

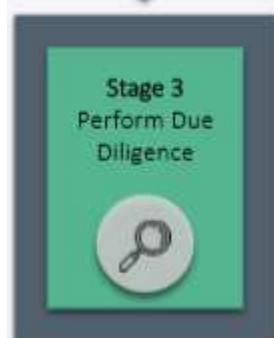


After identifying the context, funding recipients should identify the unique terrorism financing risks resulting from the context. Funding recipients may complete a supply chain risk map to identify the risks resulting from downward funding. Funding recipients should ensure their terrorism financing risks, including the risk event, sources, impacts and risk rating, remain current.

Funding recipients must conduct due diligence checks in proportion to the risks before entering into an agreement with another person or organisation. At a minimum, funding recipients must crosscheck persons or organisations against the proscribed lists:

- [List of Terrorist Organisations](#)
- [DFAT Consolidated List](#)

Funding recipients may check these lists directly or use a third party screening tool. The LinkMatchLite software may help funding recipients find matches to names on the DFAT Consolidated List. To obtain this software, email [asset.freezing@dfat.gov.au](mailto:asset.freezing@dfat.gov.au). For more information, see the DFAT's website (search Australia and Sanctions).



These lists may not represent every person or organisation associated with terrorism. For countries susceptible to terrorism, the proscribed lists should not promote complacency towards persons or organisations who do not appear on the list. Funding recipients should consider additional due diligence measures to establish if a person or organisation poses a risk of financing terrorism.

Funding recipients can also subscribe to the DFAT alert list. This may help funding recipients check any new alerts against existing persons or organisations. For more information, email [asset.freezing@dfat.gov.au](mailto:asset.freezing@dfat.gov.au).



## Reasonable Precautions

### Stage 4 Implement Controls



After identifying the risks, funding recipients should implement controls proportionate to the risks. Countries operating in countries susceptible to terrorism need to more controls to manage the risk. Controls vary from cultural controls, such as training to promote an environment that does not tolerate terrorism, to financial controls, such as reconciling funds.

Funding recipients should refer to their agreement clauses for specific controls relevant to their activity. This is because DFAT officers assess the types of risks, and implement specific agreement clauses to help manage the risks before entering into an agreement with a funding recipient.

Assurance means providing necessary oversight of the controls and treatments used to manage the risks. After implementing the controls, funding recipients should continuously provide oversight for, and test the effectiveness of, their controls. DFAT may also conduct reviews to ensure funding recipients have sufficient controls in place.

### Stage 5 Implement Assurance



Funding recipients operating in countries susceptible to terrorism must ensure they have increased levels of oversight of the controls. This includes ensuring they have oversight of any person or organisation they have an agreement with.

Funding recipients can review the controls when reviewing the risk register, but should also test the controls through formal assurance or auditing mechanisms. Charities and not-for-profits should also refer to the Australian Charities and Not-for-profits Commission's guidance on financial reporting and assurance requirements.

### Stage 6 Perform Improvements



As part of standard business, funding recipients should improve any controls if they are insufficient. This is important because the characteristics of risks constantly change. Continuously reviewing risks helps an organisation remain in tune to the changing environment, and adapt their approach in response.

#### KEY MESSAGE

All funding recipients must check the proscribed lists before entering into an agreement or employing a person. Report any exact matches of either lists to DFAT for help.

## Reporting Lines

Funding recipients should report any persons or organisations that are an exact match to a person or organisation on the List of Terrorist Organisations or the DFAT Consolidated List. This way, DFAT can help funding recipients manage sensitive situations. Please send any reports to [counter-terrorism.financing@dfat.gov.au](mailto:counter-terrorism.financing@dfat.gov.au).

Funding recipients should have reporting processes in place. Funding recipients must immediately report any suspected or actual acts of diverting DFAT funds to terrorism financing. Funding recipients should send their report to [counter-terrorism.financing@dfat.gov.au](mailto:counter-terrorism.financing@dfat.gov.au).

To report a suspicious activity that may compromise Australia's national security, call 1800 123 400 (inside Australia) or +61 1300 123 401 (outside Australia).

Funding recipients must not discuss or investigate any suspected or actual cases of terrorism financing. This could compromise the integrity of an investigation and place a person or organisation at risk.

The *Public Interest Disclosure Act 2013* (PID Act) provides protection for current or former public officials who report 'disclosable conduct'. A public official means a Commonwealth public servant. For the purposes of the PID Act, public servants include persons and organisations that provide goods or services under a Commonwealth agreement, such as funding recipients (including any sub-recipients).

DFAT's [Procedures for Handling Public Interest Disclosures](#) provides information on how to make a disclosure under the PID Act.

### KEY MESSAGE

Report any actual or suspected acts of terrorism financing to DFAT. Do not investigate as this may compromise a person or organisation's safety.

### MORE INFORMATION

- [Financing of Terrorism Risk Management Statement](https://dfat.gov.au/international-relations/security/counter-terrorism/Pages/terrorism-financing-risk-management-statement.aspx)  
<https://dfat.gov.au/international-relations/security/counter-terrorism/Pages/terrorism-financing-risk-management-statement.aspx>
- [Fraud Control Toolkit for Funding Recipients](https://dfat.gov.au/about-us/business-opportunities/Pages/dfats-new-fraud-control-toolkit.aspx)  
<https://dfat.gov.au/about-us/business-opportunities/Pages/dfats-new-fraud-control-toolkit.aspx>
- [List of Terrorist Organisations](https://www.nationalsecurity.gov.au/listedterroristorganisations/pages/default.aspx)  
<https://www.nationalsecurity.gov.au/listedterroristorganisations/pages/default.aspx>
- [DFAT Consolidated List](https://dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list.aspx)  
<https://dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list.aspx>
- The agreement (contract or grant).