

# Atlassian Foundation Policy

## Anti-terrorism, Anti-Fraud and Safeguarding Against Funds Misuse

### 1. Purpose of Policy

Atlassian Foundation International Limited (“AFIL”) is committed to taking all reasonable efforts to ensure that any funds or in-kind support we provide to our partners and third parties is not being directed towards Terrorist Activities (defined below) and to mitigate against fraud, theft, misappropriation, money laundering and the misuse of funds and corruption in the transfer of funds from AFIL.

### 2. Scope of Policy

This policy applies to:

- all programs and projects that AFIL funds or provides in-kind support in Australia and overseas.
- all AFIL personnel (being AFIL Board members, employees, volunteers, contractors and consultants); and
- all partner organizations involved in implementing our projects and programs, including international partners.
- For the purposes of this Policy, Terrorist Activities relates to activities of: a person, group or organization who is listed as a terrorist in a list published by the [Australian government](#), the [World Bank](#) and any government list of the relevant country in which a program or project is located; and
- organizations and individuals for whom Australia has imposed sanctions under the Charter of the United Nations Act 1945 (Cth) and regulations made under the Act, the Anti Terrorism Act 2001 (Cth), the Autonomous Sanctions Act 2011 (Cth) or Criminal Code Act 1995 (Cth).

### 3. Policy Principles

- We will use its best endeavors to ensure that partner organizations and parties that receive AFIL funds or in-kind support and implement AFIL program and project activities will not breach any Australian laws, including laws relating to anti-terrorism financing, money laundering or funds misuse.
- We will use best efforts to promote and implement best practice principles and practices to safeguard against funds misuse.
- We will embed this policy within our organizational culture and create awareness in relation to counter-terrorism by distributing and explaining this policy to AFIL personnel.
- AFIL will take all reasonable steps to understand the level of risk it may be exposed to in relation to terrorism financing or money laundering and, where risk is evident, ensure that appropriate precautions are in place.

## 4. Policy in Practice

### a) Due diligence of International Partners

- Each assessment and approval of an International Partner and approval of project funding shall involve an assessment of the risk of terrorism financing.
- AFIL will take all reasonable steps to undertake due diligence on each of our prospective International Partners, including:
  - confirming their identity, credentials and good standing,
  - checking the organization name and names of their key personnel and management against relevant lists of terrorist organizations and sanctioned individuals and organizations published by the Australian Government, World Bank and by the relevant country in which the program or project is located, and
  - regular project visits and reviews by AFIL staff members.
- We will keep records of due diligence checks and re-appraise all partners on an annual basis where our partnership has a term of over a year.

### b) Anti-terrorism financing practices of approved International Partners

- AFIL will require all International Partners to comply with the laws of the countries in which they are operating relating to anti-terrorism financing or money laundering.
- We will require our International Partners to have written policies and practices in relation to the avoidance of terrorism financing and funds misuse that are consistent with our policy principles. If our International Partner does not have such a policy or to the extent that its policy is less stringent or inconsistent with AFIL's, we will require the International Partner to adopt AFIL's policy.

### c) Payments and transfer of funds

- All AFIL grant payments shall be made through regulated financial institutions to known beneficiaries or approved partners.
- We will maintain detailed records of all payments of all fund transfers to third parties and International Partners.

### d) Monitoring and Reporting

- AFIL shall monitor and evaluate the activities carried out by International Partners to ensure that grants are expended on the purpose for which they are given.
- Where the Board of AFIL has assessed an International Partner at high risk of Terrorism Financing, extra precautions will be put in place by the Board.
- Any suspicious activity will be notified to the Directors of AFIL immediately.

## 5. Policy Revision History

Initial Policy adopted by the AFIL Board on October 2017.

