

Module	SANCTIONS
Jurisdictions	CTH, NSW, VIC, SA, TAS, WA, NT, QLD, ACT
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Module Scope

Does the organisation conduct global activities that are subject to global sanctions regimes and measures?

Does the organisation perform the due diligence necessary to avoid breaching any applicable sanctions regime and measures?

Has the organisation established systems, processes or procedures to ensure sanctions compliance and monitor for changes in sanctions regimes?

Module Application

The SANCTIONS module informs organisations that do business with people and companies outside of Australia how sanctions regimes and measures work and intersect, what their legal obligations are, and what procedures and processes they should have in place to ensure sanctions compliance.

In particular, the *SANCTIONS* module describes the due diligence obligations at the heart of sanctions compliance. These obligations are especially relevant to importers and exporters, logistics companies, and financial institutions that take custody of the assets of their customers.

The SANCTIONS module breaks these obligations of the organisation into the following topics:

- United Nations Security Council sanctions
- > Australian autonomous sanctions
- > International sanctions regimes and measures
- Australian export control laws
- Sanctions and anti-money laundering/counter-terrorism financing
- > Sanctions reporting, notification and information sharing
- > Sanctions enforcement and monitoring



The specific questions and answers covered by the module are:

- > What are the legal obligations under specific sanctions regimes and measures?
- > How do the legal obligations apply to organisations that do business outside of Australia?
- ▶ How do organisations comply with national and international restrictions and limitations on action?
- > What processes or procedures should be in place to ensure sanctions compliance?
- > What are the consequences for contravention?

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