



## LST-105 INCOSE COUNTRIES OF CONCERN CHART (V1)

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*Last updated: 15th March 2022*

### **Instructions for using this document:**

As a US domiciled organization, INCOSE is legally bound to uphold US law governing international actions/transactions. The guidance in this document outlines INCOSE's policy on any dealings with any non-US parties. INCOSE Central, individual INCOSE Leaders, and all Chapters<sup>1</sup> must follow this guidance. In addition, individual INCOSE Leaders and Chapters are also responsible for ensuring compliance with all applicable laws in their jurisdiction. The guidance in this document is based on US law only. Any conflicts identified between the requirements herein and the local laws must be raised to the INCOSE Central officers for appropriate action.

All financial transactions must be in accordance with INCOSE policies. Pre-approval is required for any financial transaction involving entities in the yellow zone of the matrix. Any transaction with entities in the red zone are strictly prohibited.

The header of this document lists the last updated date. Please ensure you are always referring to the most recent version which is stored in Connect ([INCOSE Connect Landing Page - Documents - Sanctions](#)). If the last updated date is more than 6 months prior to your use of this guidance, please check with the INCOSE Board of Directors via the [sanctions@incose.org](mailto:sanctions@incose.org) email account for the latest guidance.

If there is a query about a resident of any country not listed in the matrix then the correct procedure is to contact [sanctions@incose.org](mailto:sanctions@incose.org) for advice.

	These countries or regions are subject to comprehensive US sanctions or broad export restrictions. INCOSE is advised to consult with counsel and shall not do business with these countries or regions, or nationals thereof, unless licensed, authorized, or otherwise approved under US law.
	These countries or regions are subject to targeted or more limited US sanctions or export restrictions. INCOSE is advised to consult with counsel before doing business involving these countries or regions, or nationals thereof.
	Under US law, INCOSE generally is not prohibited from doing business involving these countries or regions, or nationals thereof.

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<sup>1</sup> Chapters here includes those national chapters represented by MOA organisations. The MOA Chapters are Australia (SESA), France (AFIS), Germany (GfSE), Israel, Italy, The Netherlands, South Africa, Sweden, United Kingdom.



**There may be Specially Designated Nationals and Blocked Persons (“SDNs”) and other prohibited parties residing in countries anywhere in the world; and, therefore, it is prudent to screen even those prospective parties in “green” countries, particularly where there have been no prior dealings with the party.<sup>2</sup>**

Country	Risk Level	INCOSE Policy
<ul style="list-style-type: none"> <li>• Cuba</li> <li>• Iran</li> <li>• North Korea</li> <li>• Russia</li> <li>• Syria</li> <li>• Regions of Ukraine: Crimea, Donetsk &amp; Luhansk</li> </ul>		<p><i><b>INCOSE Policy: no transactions are permitted.</b></i></p> <p>No transactions are permitted absent a license or other approval from the US government.</p> <p>Other than the free INCOSE Promotional Materials, eNote, and eNewsletter that are available to the public on INCOSE’s website, no other materials, products, or services may be provided absent a license or other approval from the US government.</p> <p>No INCOSE Chapters may be formed in these countries absent a license or other approval from the US government.</p> <p>No members from these countries are permitted absent a license or other approval from the US government.</p> <p>Note: INCOSE periodicals may accept papers from authors resident in certain countries in the Red and Yellow lists, subject to constraints. Refer to John Wiley &amp; Sons Inc. (publisher of the Systems Engineering Journal), and Taylor and Francis Ltd. (publisher of the Journal of Enterprise Transformation) for more information.</p>

<sup>2</sup> INCOSE is developing procedures to streamline the screening process. For reference, the consolidated screening list is available at: [http://2016.export.gov/ecr/eg\\_main\\_023148.asp](http://2016.export.gov/ecr/eg_main_023148.asp) and the list of OFAC sanctions programs is available at: <https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>.  
**SANCTIONED Countries of Concern Chart**



Country	Risk Level	INCOSE Policy
<ul style="list-style-type: none"> <li>• Balkans</li> <li>• Belarus</li> <li>• Burma</li> <li>• Central African Republic</li> <li>• Democratic Republic of the Congo</li> <li>• Ethiopia</li> <li>• Hong Kong</li> <li>• Iraq</li> <li>• Lebanon</li> <li>• Libya</li> <li>• Sudan</li> <li>• Venezuela</li> <li>• Yemen</li> <li>• Zimbabwe</li> </ul>		<p><b><i>INCOSE Policy: limited transactions are permitted, but prior permission from INCOSE Executive Committee is required.</i></b></p> <p>Confirm that the transaction does not involve an individual or entity on any of the US prohibited party lists, including the SDN or SSI lists (or any entities owned 50% or more by one or more SDNs). A license or other approval from the US government for such transactions is required.</p> <p>INCOSE Chapters may be formed in these countries, but consultation with counsel is advised.</p> <p>Members from these countries are permitted only after individual members and any financial institutions involved in payment of dues are screened against the SDN and SSI lists.</p> <p>Note: INCOSE periodicals may accept papers from authors resident in certain countries in the Red and Yellow lists, subject to constraints. Refer to John Wiley &amp; Sons Inc. (publisher of the Systems Engineering Journal), and Taylor and Francis Ltd. (publisher of the Journal of Enterprise Transformation) for more information.</p>
<ul style="list-style-type: none"> <li>• Argentina</li> <li>• Australia</li> <li>• Austria</li> <li>• Azerbaijan</li> <li>• Bahrain</li> <li>• Belgium</li> <li>• Brazil</li> <li>• Bulgaria</li> <li>• Canada</li> <li>• Chad</li> <li>• Chile</li> <li>• China (People’s Republic of China)</li> <li>• Colombia</li> <li>• Denmark</li> <li>• Egypt</li> <li>• Finland</li> </ul>		<p><b><i>INCOSE Policy: transactions are permitted without prior approval, but procedure listed below must be followed.</i></b></p> <p>INCOSE is permitted to conduct transactions with these countries, including accepting members from and forming chapters in these countries without special prior approval.</p> <p>INCOSE is permitted to accept members who are nationals of countries listed in the Red and Yellow lists who are legally resident in the US for the purpose of employment or study in systems engineering or related fields.</p>



Country	Risk Level	INCOSE Policy
<ul style="list-style-type: none"> <li>• France</li> <li>• Germany</li> <li>• Ghana</li> <li>• Greece</li> <li>• Hungary</li> <li>• India</li> <li>• Indonesia</li> <li>• Ireland</li> <li>• Israel</li> <li>• Italy</li> <li>• Japan</li> <li>• Jordan</li> <li>• Kazakhstan</li> <li>• Lithuania</li> <li>• Malaysia</li> <li>• Mexico</li> <li>• Morocco</li> <li>• Netherlands</li> <li>• New Zealand</li> <li>• Nigeria</li> <li>• Norway</li> <li>• Pakistan</li> <li>• Peru</li> <li>• Philippines</li> <li>• Poland</li> <li>• Portugal</li> <li>• Qatar</li> <li>• Romania</li> <li>• Rwanda</li> <li>• Saudi Arabia</li> <li>• Singapore</li> <li>• South Africa</li> <li>• South Korea (Republic of Korea)</li> <li>• Spain</li> <li>• Sweden</li> <li>• Switzerland</li> <li>• Taiwan (Republic of China)</li> <li>• Thailand</li> <li>• Tunisia</li> </ul>		<p>INCOSE MOA Chapters<sup>3</sup> are permitted to accept members who are nationals of countries listed in the Red and Yellow lists who are legally resident in the MOA Chapter country for the purpose of employment or study in systems engineering or related fields.</p> <p>All new members must be screened against the US prohibited party lists, including the SDN list, prior to confirming membership and accepting dues or other payment.</p>

<sup>3</sup> MOA Chapters are Australia (SESA), France (AFIS), Germany (GfSE), Israel, Italy, The Netherlands, South Africa, Sweden, United Kingdom.



Country	Risk Level	INCOSE Policy
<ul style="list-style-type: none"><li>• Turkey</li><li>• Uganda</li><li>• United Arab Emirates</li><li>• United Kingdom</li><li>• United States of America</li><li>• Vietnam</li></ul>		