



## **ADM-108: Global Operations – 15 April 2021**

### **Purpose & Scope:**

This policy defines the framework for INCOSE Global Operations, including considerations for compliance with sanctions, export control, personal information protection and other requirements that result from the location of incorporation of INCOSE as an organization, in this case in the State of California in the United States of America. The policy also addresses compliance with requirements that result from being a global organization, where these requirements are beyond those that result from the location of incorporation of INCOSE.

This policy applies to the INCOSE Board of Directors, the Boards of Directors of INCOSE Chapters globally, all institutional members of INCOSE, all individual members and associate members of INCOSE and the INCOSE central and local administrative offices.

### **Authority & Responsibility:**

The Board of Directors of INCOSE shall take the necessary action to comply with the requirements defined in this policy. They shall also ensure that Chapters of INCOSE, institutional members, full individual members, associate members and administrative offices, globally, comply with these policies.

### **Requirements - Sanctions:**

As a US domiciled organization, INCOSE is legally bound to uphold US law governing international actions/transactions. INCOSE shall publish a [document](#) that outlines INCOSE's screening for compliance, and the actions and constraints on any dealings with any non-US parties. INCOSE Central, individual INCOSE Leaders, and all Chapters must follow this guidance. In this context, "Chapters" here includes those national chapters represented by Memorandum of Agreement (MOA) organizations. The current MOA Chapters are indicated in the MOA Chapter List. In addition, individual INCOSE Leaders and Chapters are also responsible for ensuring compliance with all applicable laws and regulations. The guidance in the published 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 resolution.

INCOSE shall publish a [matrix](#) that categorizes these country interactions as follows:

- Red - 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.



- Yellow - 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.
- Green - Under US law, INCOSE generally is not prohibited from doing business involving these countries or regions, or nationals thereof.

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 of INCOSE business with an entity in the red zone is strictly prohibited. INCOSE MOA chapters in countries with different sanctions requirements shall consult with INCOSE Central before engaging with any parties that are sanctioned by the USA but not by their country.

### **Requirements – Export Control**

The requirement to protect export-controlled information is an individual responsibility. All INCOSE members and associate members shall respect export control requirements and shall not share or publish export-controlled information in INCOSE meetings, websites or other collaborative spaces.

All INCOSE members submitting work, papers, products or other materials that will be shared and could be published shall be asked to indicate the absence of Export Control information as part of their IP release consent.

### **Requirements – Personal Information Protection**

Many countries have strict controls on what information may be held on individuals, including the right for that information to be removed when the individual ceases to be a member of the organization. INCOSE shall respect these requirements and as a global organization shall comply with the most restrictive requirements consistent with membership demographics. Please see CIO-101 for the policy for INCOSE compliance with these Personal Information Protection requirements.

### **Requirements – Other**

INCOSE shall review any other controls that impact the global nature of the organization and shall update this policy to address these controls.

The INCOSE Chief of Staff shall conduct a review of the matrix of country interactions annually.

### **Related Policies**

None

### **Related Procedures, Templates and Forms**

None



**SUPERSEDES: ADM-108 dated 20 April 2018**

**APPROVED BY: INCOSE Board of Directors, Virtual Q2, 15 April 2021**

**POLICY OWNER (RACI Responsible R): Chief of Staff / Operations Manager**

**MAINTAINED BY (RACI Accountable A): Secretary**