## SDU SAFE guide regarding international partners who require special consideration



## INTRODUCTION

The URIS guidelines recommend that universities be aware of the risks associated with collaborating with international partners in relation to espionage and unwanted knowledge transfer. <a href="URIS-guidelines">URIS-guidelines</a> do not specify a list of countries or specific partners that pose a risk of espionage or unwanted knowledge transfer, and there is no official positive or negative list of specific partners.

Danish Security and Intelligence Service assesses in "<u>Vurdering af spionagetruslen mod Danmark</u>, <u>Færøerne og Grønland</u>" from 2023 that China, Russia and Iran as potential countries<sup>1</sup>, which may pose a risk of "unwanted knowledge transfer". Global or national geopolitical changes may also influence whether Danish universities should collaborate with specific institutions or countries.

## CONTENT

SDU SAFE has prepared this guide<sup>2</sup> to help SDU researchers and employees make an initial assessment of which partners<sup>3</sup>:

- SDU SAFE does not recommend collaboration with.
- Employees should seek advice from SDU SAFE in relation to.
- Does not entail further action.

In general, special attention should be paid if the collaboration involves "critical research" or defence technologies (defence/NATO-funded). SDU SAFE is aware that there may be grey areas in these contexts, such as:

- Ongoing projects involving "critical research" with partners from URIS countries.
- Unclear whether it is "critical research," including, for example, robot or Al technologies for use in the green transition, which only in some instances is covered by "critical research."
- EU-funded projects involving "critical research" that have been in development for several years and include partners from URIS countries.
- Varying SDU involvement or access to international projects involving "critical research" and including partners from URIS countries.
- Ftc.

The head of department must always be informed and has an obligation to assess the risk of "unwanted knowledge transfer" when entering cooperation with institutions from URIS countries. SDU SAFE is available for advice regarding "undesirable knowledge transfer."

It is recommended that SDU employees also be aware of the risk of transferring unwanted knowledge to other countries or partners.

SDU RIO must be informed of cooperation agreements at <u>contracts@sdu.dk</u> if the cooperation includes agreements on research collaboration, agreements on commissioned research, Material Transfer Agreements (MTA) or Non-Disclosure Agreements (NDA).<sup>5</sup>.

<sup>&</sup>lt;sup>1</sup> The URIS project group at SDU has decided that Belarus, Iran, China, and Russia are "URIS countries" at SDU. However, partners requiring special consideration may also come from other countries.

<sup>&</sup>lt;sup>2</sup> The guide is based on Danish universities' approach to the area, includes OFAC's and the EU's sanctions lists, and considers the practices of other Danish universities in this area, including AAU, AU, DTU, and KU.

<sup>&</sup>lt;sup>3</sup> Partners include institutions or organizations. The guide does not cover employment or affiliation of guests, including researchers or TAP. See, if applicable. <a href="https://sdunet.dk/da/servicesider/uris/sdu-safe/sdu-safe-nyheder/baggrundstjek-af-kommende-medarbejdere">https://sdunet.dk/da/servicesider/uris/sdu-safe/sdu-safe/sdu-safe-nyheder/baggrundstjek-af-kommende-medarbejdere</a>.

<sup>4</sup> See SDU's definition of "critical research" here: <a href="https://sdunet.dk/-/media/sdunet/filer/servicesider/sdu-safe/kritisk-forskning/definition-af-kritisk-forskning-paa-sdu-(1).pdf">https://sdunet.dk/-/media/sdunet/filer/servicesider/sdu-safe/kritisk-forskning/definition-af-kritisk-forskning-paa-sdu-(1).pdf</a>

<sup>&</sup>lt;sup>5</sup> For more take a look at: https://sdunet.dk/en/research/legal-services/researchportal\_legal\_contracts.



## SDU SAFE – overview of international partners requiring special consideration – updated 12.06.25 **NO LIMITATIONS** SHOULD SEEK ADVICE FROM SDU SAFE SDU DOES NOT COOPERATE WITH Chinese military Chinese – "Critical research" projects Chinese – other Chinese – other with other Chinese organizations 8 universities Chinese universities -Chinese universities. Research in: climate not critical research Chinese – 7 sons Chinese – Chinese organizations<sup>8</sup> as listed change, universities<sup>6</sup> in the EU or OFAC sanctions lists environmental Chinese - China protection. Chinese - Zhejiang Scholarship Council (CSC) sustainable University (ZJU) agriculture and food, Chinese and global health Chinese - Southern University of - Private companies with ties to Science Technology (SUSTECH) the Chinese military (PLA) Other ongoing projects with organizations from URIS Chinese Chinese countries dealing with "critical research" - Hikvision - BGI<sup>7</sup> Other ongoing projects, such as those funded by the Branches on the West Bank Chinese EU, etc., that deal with "critical research" and include of Israeli organizations - Huawei partners from URIS countries Iranian - "critical research" Iranian - Shahid Other upcoming projects, such as those funded by the projects with other Iranian Russian Beheshti University EU, etc., that deal with "critical research" and include universities organizations partners from URIS countries Iranian - Malek Ashtar Iranian organizations – University Belarussian Iranian companies that Iranian - other Iranian organizations appear on the EU or OFAC universities - not Iranian - Sharif sanctions lists critical research University of Technology Belarussian organizations<sup>8</sup> Iranian organizations Chinese organizations Russian organizations<sup>8</sup>

Beijing Genome Institute (BGI), including all subsidiaries such as BGI Research, BGI Tech Solutions, Forensic Genomics International, etc.

<sup>&</sup>lt;sup>6</sup> "7 sons"-universities: "Beihang Universitet", "Beijing Institute of Technology", "Harbin Engineering University", "Harbin Institute of Technology", "Nanjing University of Aeronautics and Astronautics", "Nanjing University of Science and Technology" and "Northwestern Polytechnical University".

<sup>&</sup>quot;Organizations" covers universities, think tanks, foundations, companies, authorities, etc. The employment of individuals at SDU is not covered in this context, and they should undergo a background check" in connection with any employment, cf. the guidelines for background checks at SDU.

Denmark's general approach to educational and research cooperation with Israel is to cooperate exclusively with departments of Israeli institutions located in Israel based on the pre-1967 borders. This means that there no cooperation is allowed with departments of institutions in the illegal settlements on the West Bank, including East Jerusalem.