ATHENE
National Research Center
for Applied Cybersecurity

Research and Knowledge Security

Living Appendix – Operational Lists
Companion to the Best Practice

ATHENE — National Research Center for Applied Cybersecurity

ATHENE Public, July 28, 2026

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This document is the living operational register. It is maintained by the Chief Research Security Officer (CRSO) and updated on a fixed cycle; every table carries a "reviewed" date. It is the single, regularly-updated home for the specifics — the partner tiers, the source lists, the routing and contact register, the maintenance log, and the effectiveness dashboard.

Each table below is one of the lists named in the best practice. The short note before each table says what the columns hold and how the CRSO fills it. Cells shown as *[tbd]* or *[like this]* are specifics the ATHENE office has yet to confirm; named individual contacts are not printed here but kept in the CRSO's working copy. Every table carries the date it was last reviewed.

1 Country and region partner tiers

Scheme. The partner tiers are split by *how the tier is set*. Table 1 holds the tiers that follow directly from an external authority — EU, EEA, and NATO membership, and the EU sanctions and embargo regimes. Table 2 holds the tiers ATHENE sets by its own case-by-case judgment — the like-minded countries it treats as trusted, the systemic-rival tier, and the residual "assess on indicators" category. Both tables share the columns: the starting tier (the four tiers — trusted circle, systemic rival, high risk, embargoed or sanctioned — are defined in the best practice's risk-and-chance method), the documented basis (source and edition), and the date last reviewed. Each country sits in exactly one row, taking the most specific category first (EU → EEA → other NATO → other like-minded).

Country / region	Starting tier	Documented basis	Reviewed
EU member states (the 27)	Trusted circle	EU membership (europa.eu)	2026-07
EEA, non-EU: Iceland, Liechtenstein, Norway	Trusted circle	EEA Agreement	2026-07
All other NATO members not already above	Trusted circle	NATO membership (nato.int)	2026-07
States subject to broad EU restrictive measures or arms embargoes (e.g. Belarus, Iran, North Korea, Russia, Syria)	Embargoed or sanctioned (mandatory legal review): cooperation prohibited only where a specific sanctions, embargo, or export-control restriction reaches the partner, end-use, item, funding, or activity	EU restrictive-measures regimes; export-control catch-all [3] (live list `https://www.sanctionsmap.eu/`)	2026-07

Table 1: *Externally defined partner tiers.* Set directly by EU/EEA/NATO membership or by a binding EU sanctions or embargo regime. Cooperation is a settled legal "no" only where a binding sanction, embargo, or export control actually reaches the activity.

Country / region	Starting tier	Documented basis	Reviewed
Australia	Trusted circle	Individual decision	2026-07
Israel	Trusted circle	Individual decision	2026-07
Japan	Trusted circle	Individual decision	2026-07
New Zealand	Trusted circle	Individual decision	2026-07
South Korea	Trusted circle	Individual decision	2026-07
People's Republic of China	Systemic rival	HRK differentiated China guidance [4]; current federal/EU research-security framework [1, 2]	2026-07
Any state not separately listed	Assess on indicators (high-risk tier where the indicators warrant)	Per the best-practice method (no blanket tier)	—

Table 2: *Case-by-case partner tiers.* Set by ATHENE's own judgment rather than an external list. The starting tier sets where scrutiny begins; it never substitutes for the case-by-case method.

2 Named-organization watch sources

Scheme. Public sources screened for sanctioned or restricted organizations. *What a listing triggers depends on the source.* An **EU sanctions or embargo** listing is **legally binding**: cooperation or a transaction is prohibited to the extent the listing reaches the partner, the end-use, the funds, or the activity. A **US** listing (Entity List, SDN) is **not binding under German law**; it is a **risk indicator** that raises scrutiny and feeds the case-by-case judgment, and becomes binding only where US jurisdiction applies (US-origin items or software, US persons, or US-dollar clearing). Each source is consulted in its live online version: the EU consolidated sanctions list through the EU Sanctions Map (`https://www.sanctionsmap.eu/`), the US Entity List from the Bureau of Industry and Security (`https://www.bis.gov/entity-list`), and the OFAC Specially Designated Nationals list (`https://ofac.treasury.gov/sanctions-list-service`).

Named-organization source	Maintained by	What a listing triggers	Checked
EU consolidated list of sanctioned persons and entities	EU / EEAS	**Legally binding**: cooperation or transaction prohibited where the listing reaches the partner, end-use, funds, or activity	2026-07
US Entity List	US BIS	**Not binding under German law**: a risk indicator that raises scrutiny; binding where US-origin items, software, or technology under the EAR are involved	2026-07
OFAC SDN list	US OFAC	**Not binding under German law**: a risk indicator that raises scrutiny; binding where a US nexus exists (US persons, US-dollar clearing, US-origin goods)	2026-07

Table 3: *Named-organization watch sources.* What a listing on each actually triggers — a binding legal prohibition (EU) versus a risk indicator (US).

3 Indicator sources

Scheme. For states and partners not settled by a sanctions listing, the tier and risk assessment rest on documented indicators rather than a static blacklist. The CRSO records which source and edition fed a given tier — this is what keeps the list auditable and stops it ossifying into an outdated verdict. The standing inputs mirror the red-flag indicator set ATHENE adopts from the Max Planck guideline [6], each consulted in its live online version.

Indicator domain	Source (live)
Academic freedom & human rights	Academic Freedom Index (https://academic-freedom-index.net/); Freedom House, Freedom in the World (https://freedomhouse.org/countries/freedom-world/scores)
Democracy & rule of law	V-Dem indices (https://www.v-dem.net/)
Corruption	Transparency International, Corruption Perceptions Index (https://www.transparency.org/en/cpi)
Sanctions & export-control status	The source lists of Table 3
Military / defence-industry ties (esp. systemic rivals)	ASPI China Defence Universities Tracker [5] (https://unitracker.aspi.org.au/) — rates institutions by defence ties; institutional evidence, not nationality
Espionage / coercion history	Documented, case-specific

Table 4: *Indicator sources for the risk assessment.*

4 Routing register: functions by participating organization

Scheme. One row per participating organization; the columns name the office that holds each statutory function. Where an organization has no ethics organ of its own, the case routes to the Research Review Board (defined in the best practice). Named individual contacts are not printed here; they are held in the CRSO's working copy.

Participating organization	Export control (Ausfuhrverant-wortliche/r)	Ethics organ for security-relevant research	Data-protection controller	Information security
Fraunhofer SIT	Exportkontroll-beauftragte/r des Instituts	ATHENE Research Review Board	Fraunhofer DPO, datenschutz@zv.fraunhofer.de	isb@sit.fraunhofer.de
Fraunhofer IGD	Exportkontroll-beauftragte/r des Instituts	ATHENE Research Review Board	Fraunhofer DPO, datenschutz@zv.fraunhofer.de	isb@igd.fraunhofer.de
TU Darmstadt	Kanzler; operativ: Stabsstelle III S2 – Außenwirtschaft / Exportkontrolle	Ethikkommission (consulted); Präsidium decides via cross-Dezernat task force	TU Darmstadt DPO, datenschutz@tu-darmstadt.de	ciso@tu-darmstadt.de
Goethe-Universität Frankfurt	Kanzler; operativ: Dezernat für Forschung, Transfer und Internationales	ATHENE Research Review Board	Goethe DPO, dsb@uni-frankfurt.de	it-sicherheit@uni-frankfurt.de
Hochschule Darmstadt	Kanzler & Justitiariat; operativ: Servicezentrum Forschung und Transfer (SFT)	ATHENE Research Review Board; Ethikkommission (ab 2027)	h_da DPO, datenschutz@h-da.de	it-sec.itda@h-da.de

Table 5: *Routing register.* The participating organizations' functions.

Other research-security functions. Beyond the statutory functions of Table 5, research security also involves vetting people (guest researchers, doctoral candidates) and clearing cooperations and projects. Table 6 records who owns these per organization. The baseline sanctions-screening of personnel runs through the export-control function above; the entries here are the additional, organization-specific processes the CRSO confirms.

Participating organization	Personnel & guest-researcher vetting	Cooperation & project clearing
Fraunhofer SIT	Institute Directorate	Institute Directorate
Fraunhofer IGD	Institute Directorate	Institute Directorate
TU Darmstadt	Präsidium-endorsed guest-researcher vetting (Dez. VIII), with the export-control function and the Ethikkommission	Cooperation-vetting process (Dez. VIII "Informationspool"); Präsidium decides
Goethe-Universität Frankfurt	Personalabteilung, https://www.uni-frankfurt.de/45699737/Abteilung_Personalservices, personalabteilung@uni-frankfurt.de	Cooperation-vetting process (Research Support); Präsidium decides, https://www.uni-frankfurt.de/102672447/Research_Support, research-support@uni-frankfurt.de
Hochschule Darmstadt	HR (Ressort K, K.2): Sanctions list screening in the recruitment process	SFT & Justitiariat: Standard templates for cooperation agreements, including guidance notes, are provided

Table 6: *Other process owners.* Research-security owners beyond the statutory functions of Table 5.

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Imprint

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Notes

This document was supported by funding from the Federal Ministry of Research, Technology and Space (BMFTR) and the Hessian Ministry of Science and Research, the Arts and Culture (HMWK) within their joint funding of the National Research Center for Applied Cybersecurity ATHENE.