



A Non-Profit, Mutual-Benefit Corporation

Requirements of Membership Policy

Adopted by the SDA Board on

MAY 27, 2026

SD CARD ASSOCIATION

REQUIREMENTS OF MEMBERSHIP POLICY

The SD Card Association (“SDA”) is committed to adhering to the laws and regulations of the state and country where SDA is incorporated and does business. The Requirements of Membership Policy aims to document additional “Conditions of Membership” above and beyond those stated in the SDA Bylaws that are required by the rules and regulations of the SDA’s state (California, U.S.) and country of incorporation.

Statement of Policy

Membership of Companies from Embargoed Countries:

SDA will not allow membership from companies that are based in export restricted Block List countries or from companies that are on the following U.S. sanctions lists (“Sanctions Lists”), which can be found on the Consolidated Screening List (“CSL”)¹:

- Department of Commerce’s Bureau of Industry and Security (“BIS”) – Denied Persons List
- BIS – Unverified List
- BIS – Military End User (MEU) List
- Department of State’s Bureau of International Security and Non-proliferation – Nonproliferation Sanctions List
- Department of State’s Directorate of Defense Trade Controls – AECA Debarred List
- Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) – Specially Designated Nationals and Blocked Persons List (“SDN List”)
- OFAC – Foreign Sanctions Evaders (“FSE”) List
- OFAC – Sectoral Sanctions Identifications (“SSI”) List
- OFAC – Palestinian Legislative Council (“PLC”) List
- OFAC – Correspondent Account or Payable-Through Account Sanctions (“CAPTA”) List
- OFAC – Non-SDN Menu-Based Sanctions List (“NS-MBS List”)

Note the BIS Entity List is part of the CSL, but per the BIS Interim Final rule issued on July 18, 2024², the SDA qualifies as engaging in “standards related activities” for an exception to the BIS Entity List prohibition of participation from companies on the BIS Entity List.

Additionally, SDA will carefully screen and consult with SDA legal counsel before allowing membership from companies that are based in export restricted Grey List countries or regions.

Further, the fact that an applicant company has affiliated companies in any of the below listed countries does not imply that such company’s application for membership should be declined. However, if SDA has any knowledge that the affiliated companies are established in any of the Block List Countries, SDA will treat the applying company according to the proposed procedures for applicants from Grey List countries.

As of August 27th, 2024:

¹ The Consolidated Screening List can be found at <https://www.trade.gov/consolidated-screening-list>.

² See Federal Register Vol. 89, No. 138, 58265, available at 2024-15810.pdf (govinfo.gov).

“Block List” countries or regions are defined as: Cuba, Iran, Syria, North Korea, and the Crimea, Donetsk and Luhansk Regions of Ukraine/Russia.

“Grey List” countries or regions are defined as: Afghanistan, Balkans (including Albania, Bosnia and Herzegovina, Croatia, Kosovo, Montenegro, North Macedonia, and Serbia), Belarus, Burma/Myanmar, Burundi, Central African Republic, China, Cyprus, Democratic Republic of Congo, Eritrea, Ethiopia, Haiti, Hong Kong, Iraq, Lebanon, Libya, Mali, Nicaragua, Russia, Somalia, South Sudan, Sudan, Ukraine, Venezuela, Yemen and Zimbabwe.

The Block List and Grey List will need to be updated from time to time, as countries and regions subject to embargoes and export restrictions may change over time.

Procedure

Process for Updating Country Lists:

The original Block List and Grey List are derived from United States (“U.S.”) regulations and sanctions regarding embargoed and sanctioned countries and regions as documented at <https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>.

From time to time SDA will consult with the appropriate experts to revise the Block List and Grey List based on updates to U.S. sanctions and regulations. This policy will be updated with any changes to the country lists.

Process for Accepting New Members:

The SDA Executive Director (“ED”) will review applications for membership on at least a monthly basis. Applicants from countries or regions on the Block List or Sanctions Lists will be immediately rejected. For applicants from countries or regions on the Grey List, the ED will request the SDA Office to send the applicant an ownership screening questionnaire, and then after it is returned, to then consult with SDA Legal Counsel for a recommendation on whether to accept the application for membership. The ED will relay the Legal Counsel’s response to the SDA Board, who will decide accordingly.

Process for Reviewing Status of Existing Members:

From time to time and/or after the Block List, Sanctions Lists, or Grey List are updated (as described above), the Executive Director shall review the list of members and the countries each is from. If a company is from a country on the Block List, then the Board should be notified and then that company’s membership should be immediately terminated with a pro-rated refund of any membership dues. If a company is on the Grey List, then the Executive Director shall notify the Board of that company (that is from a Grey List country) and the Board shall carefully consider if that company should remain a member. If a company is on any of the Sanctions Lists, then the SDA will restrict their access to SDA members-only information and participation in any SDA members-only activities and notify the Board and the member of that action.

To the extent the SDA believes or determines that continued membership may cause SDA or any of its members to be in violation of applicable US sanctions, SDA has the right to immediately terminate membership without a refund.

Consent to Sharing of Member's Information

As part of its review processes described above for both new and existing members, SDA may use London Stock Exchange Group plc, LCH Limited or such other companies as may be approved by the SDA Board to conduct sanctions screening. By agreeing to this Requirements of Membership Policy, member acknowledges and consents to the use of such third party companies to conduct such screenings and understands that this screening may include checks of the entity and, in some limited cases, the personal information of the member's owners, representatives, or shareholders against various databases and watchlists to ensure compliance with applicable laws and regulations. To the extent that a member submits such personal information on behalf of its owners, representatives, or shareholders, member represents that it has obtained informed consent from these individuals for this disclosure. Where the SDA intends to disclose personal information of individuals affiliated with a member company (including employees, representatives, or shareholders) to a third-party service provider in connection with sanctions screening or similar procedures, SDA shall, to the extent practicable, provide prior notice to the member company regarding the scope and purpose of such disclosure. SDA will take into reasonable consideration applicable local data protection requirements when handling personal information of individuals subject to enhanced screening processes, where such individuals are clearly identifiable and limited in number.

The SDA reserves the right to modify or amend this policy at any time.