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Wiley appreciates the Office of the United Nations High Commissioner for Human Rights' invitation to comment on the publication of scholarly articles by authors in sanctioned countries.

Wiley takes compliance with the sanctions regulations, including those applied by the United States Government and as administered and enforced by the Office of Foreign Assets Control (OFAC), very seriously. At the same time, we are careful to avoid what you have termed "overcompliance," guided by our core values and our unwavering belief that knowledge sharing plays a critical role in solving the greatest challenges facing humankind. Wiley believes the global scientific and academic community is a powerful force for progress and that the free flow of ideas, perspectives, and insights must continue, even during geopolitical and humanitarian crises.

We carefully assess the requirements of all sanctions regimes, taking particular note of any exceptions that may apply to international publishing activities. With an eye towards academic freedom and the free flow of global knowledge, we endeavour to interpret such exceptions as generously as possible while remaining within the bounds of the relevant regulations. Screening to ensure compliance with sanctions regulations is performed within the Editorial Office for each journal, which may be internal to Wiley or handled by an external editor engaged by Wiley or one of our many publishing partners, primarily societies, on whose behalf Wiley publishes. Wiley produces guidance to enable each Editorial Office to check and implement the sanctions regulations in place and, if required, to escalate queries to Wiley's Legal Department for final review. Wiley assuredly does not summarily reject submissions from authors located in sanctioned countries or territories.

The general guidance from OFAC has not changed since its issue in October 2016, even though the United States Government has since imposed additional sanctions on certain countries, territories, and organizations. Wiley has not sought additional clarification on the implementation of the sanctions regulations either from OFAC or another competent authority within the United States Government.