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MEMORANDUM

TO: South Dakota Investment Council

FROM: Tammy V. Otten, CPA CFA *TVO*
Assistant Investment Officer Fixed Income/Derivative

Matthew L. Clark, CFA *MLC*
State Investment Officer

DATE: January 18, 2022

RE: Iran Scrutinized Companies List

The Iran divestment law (SDCL 4-5-48 to 4-5-60) went into effect on July 1, 2010. The Council utilizes a public list provided by Florida to determine the South Dakota list of Iran scrutinized companies.

Florida updated their Iran scrutinized companies list on December 20, 2021. There were no additions or deletions from the prior list.

SDCL 4-5-57 allows SDRS to invest indirectly in companies on the list through pooled funds. SDRS has about 0.5% of total fund assets invested in a pooled fund managed by Dimensional Fund Advisors (DFA) which at times has held companies on the list. DFA has been informed of the law and their response is on file. SDRS is less than 1% of the DFA pooled fund.

Staff continues to monitor changes to the Federal sanctions law, or its application, to determine the effect on the South Dakota Iran scrutinized companies list.

STAFF RECOMMENDATION: *Staff recommends no changes to the South Dakota Iran scrutinized companies list (attached) during the February 3, 2022 Council virtual meeting.*

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Attachment

Iran Scrutinized Companies List

South Dakota Investment Council - 02/03/2022

(additions denoted by ^)

China National Petroleum Corporation (CNPC)
Bank of Kunlun Co Ltd
China Petroleum Engineering Corp
CNPC Capital Company Ltd
CNPC General Capital Ltd
CNPC Global Capital Ltd
CNPC HK Overseas Capital Ltd
Kunlun Energy Company Ltd
Kunlun Financial Leasing Co Ltd
PetroChina

China National Offshore Oil Corp Ltd (CNOOC)
China BlueChemical Ltd
China Oilfield Services Ltd (COSL)
CNOOC Curtis Funding No.1 Pty Ltd
CNOOC Energy Technology & Services Ltd
CNOOC Finance Limited
CNOOC Nexen Finance
COSL Finance (BVI) Limited
COSL Singapore Capital Ltd

China Petrochemical Corporation (Sinopec Group)
China Petroleum & Chemical Corp (CPCC) Sinopec
Sinopec Capital 2013 Ltd
Sinopec Century Bright Capital Investment Ltd
Sinopec Engineering Group Co Ltd
Sinopec Group Overseas Development 2012-2018
Sinopec Kantons Holdings Ltd
Sinopec Oilfield Equipment Corp
Sinopec Oilfield Service Corp
Sinopec Shanghai Petrochemical

Gazprom
Gazprom Neft
Gazprom Promgaz
GPN Capital SA
Territorial Generating Company No 1
Indian Oil Corp Ltd (IOCL)
Mosenergo

Oil & Natural Gas Corp (ONGC)
Hindustan Petroleum Corp Ltd
Mangalore Refinery & Petrochemicals Ltd
ONGC Videsh Limited (OVL)

Petroliam Nasional (Petronas)
Engen Botswana
Gas District Cooling Putrajaya Sdn Bhd
KLCC Property Holdings Bhd
Malaysia Marine & Heavy Engineering Holdings Bhd
MISC Berhad
Petronas Capital Limited
Petronas Chemicals Bhd
Petronas Dagangan Bhd
Petronas Gas Berhad
Petronas Global Sukuk
Putrajaya Management Sdn Bhd

Removed effective 02/03/2022:

none

Florida State Board of Administration - 12/20/2021

(additions denoted by *)

China National Petroleum Corporation (CNPC)
Bank of Kunlun Co Ltd
China Petroleum Engineering Corp
CNPC Capital Company Ltd
CNPC General Capital Ltd
CNPC Global Capital Ltd
CNPC HK Overseas Capital Ltd
Kunlun Energy Company Ltd
Kunlun Financial Leasing Co Ltd
PetroChina

China National Offshore Oil Corp Ltd (CNOOC)
China BlueChemical Ltd
China Oilfield Services Ltd (COSL)
CNOOC Curtis Funding No.1 Pty Ltd
CNOOC Energy Technology & Services Ltd
CNOOC Finance Limited
CNOOC Nexen Finance
COSL Finance (BVI) Limited
COSL Singapore Capital Ltd

China Petrochemical Corporation (Sinopec Group)
China Petroleum & Chemical Corp (CPCC) Sinopec
Sinopec Capital 2013 Ltd
Sinopec Century Bright Capital Investment Ltd
Sinopec Engineering Group Co Ltd
Sinopec Group Overseas Development 2012-2018
Sinopec Kantons Holdings Ltd
Sinopec Oilfield Equipment Corp
Sinopec Oilfield Service Corp
Sinopec Shanghai Petrochemical

Gazprom
Gazprom Neft
Gazprom Promgaz
GPN Capital SA
Territorial Generating Company No 1
Indian Oil Corp Ltd (IOCL)
Mosenergo

Oil & Natural Gas Corp (ONGC)
Hindustan Petroleum Corp Ltd
Mangalore Refinery & Petrochemicals Ltd
ONGC Videsh Limited (OVL)

Petroliam Nasional (Petronas)
Engen Botswana
Gas District Cooling Putrajaya Sdn Bhd
KLCC Property Holdings Bhd
Malaysia Marine & Heavy Engineering Holdings Bhd
MISC Berhad
Petronas Capital Limited
Petronas Chemicals Bhd
Petronas Dagangan Bhd
Petronas Gas Berhad
Petronas Global Sukuk
Putrajaya Management Sdn Bhd

Removed effective 12/20/2021:

none