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## MEMORANDUM

TO: South Dakota Investment Council

FROM: Samantha Rains, CPA  
Senior Investment Accountant

Matthew L. Clark, CFA  
State Investment Officer

DATE: July 19, 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 June 22, 2022. 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 does not currently have any externally-managed pooled funds that would be invested in any companies on the list.

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 August 23, 2022 Council meeting.*

MLC/smr  
Attachment

## Iran Scrutinized Companies List

### South Dakota Investment Council - 08/23/2022

(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

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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

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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

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

Mosenergo

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

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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 08/23/2022:**

none

### Florida State Board of Administration - 06/22/2022

(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

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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

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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

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

Mosenergo

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

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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 06/22/2022:**

none