MINNESOTA STATE BOARD OF INVESTMENT

OF THE COLUMN THE COLU

Board Members:

Governor Mark Dayton

State Auditor Rebecca Otto

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DATE:

January 15, 2014

TO:

Senator Tom Saxhaug, Chair, Senate Committee on

State Departments and Veterans Division

Senator Roger C. Chamberlain, Senate Committee on State

Departments and Veterans Division

Senator Richard Cohen, Chair, Senate Committee on Finance Senator Michelle L. Fischbach, Senate Committee on Finance

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Government Operations

Representative Joyce Peppin, House Committee on Government

Operations

Representative Lyndon Carlson, Sr., Chair, House Committee

on Ways and Means

Representative Mary Liz Holberg, House Committee on Ways

and Means

Representative Mary Murphy, Chair, House Committee on

State Government Finance and Veterans Affairs

Representative Bob Dettmer, House Committee on State

Government Finance and Veterans Affairs

FROM:

Mansco Perry III, Executive Director MP 3

SUBJECT:

Report on Iran Required by Minnesota Statutes, Section 11A.244.

Minnesota Statutes, section 11A.244, requires the State Board of Investment (SBI) to submit a report to the chairs of the legislative committees and divisions with jurisdiction over the SBI concerning the SBI's identification of, communication with and discontinuance of investment in certain companies with operations in Iran.

Section 11A.244, subdivision 9 specifies that the SBI include in the report:

- 1. a list of scrutinized companies;
- 2. summary of correspondence with companies;
- 3. a list of investments divested;
- 4. a list of prohibited investments;
- 5. a description of any progress in having investment management firms create investment funds that exclude Iran companies.

As provided for in Section 11A.244, subdivision 2, the SBI purchases Iran research services regarding companies with business operations in Iran from IW Financial through Glass Lewis.

Attachment 1 is the list of scrutinized companies.

The SBI did not send out any letters to additional companies in 2013.

The law calls for divestment of securities of companies which do not publicly announce substantial action specific to Iran within 90 days of the SBI correspondence. The SBI divested 519,308 shares of stock of five companies in 2013.

Attachment 2 is the list of restricted companies sent to SBI equity and bond managers. The managers are explicitly instructed to refrain from purchasing securities of companies on this list.

Enclosures

ATTACHMENT 1 RESTRICTED IRAN COMPANIES SECURITIES OF COMPANIES MAY NOT BE PURCHASED FOR PORTFOLIO

COMPANY NAME Bharat Petroleum Corporation Ltd. China Petroleum & Chemical Corp Daelim Industrial Gail (India) Ltd. Gazprom GS Engineering & Construction Corp GS Holdings Gubre Fabrikalari T.A.S. Ina-Industrija Nafte DD Indian Oil Corporation Ltd. Liquefied Natural Gas Ltd Marie Tecnimont S.p.A. Mitsui & Co. Ltd Nagarjuna Fertilizers & Chemicals Ltd. Oil & Natural Gas Corporation Ltd.	COUNTRY India China South Korea India Russia South Korea South Korea Turkey Croatia India Australia Italy Japan India India
Oil & Natural Gas Corporation Ltd.	India
PetroChina Co. Ltd. Punj Lloyd Ltd. Toyota Tsusho Corporation	China India Japan

Effective Date: December 17, 2013

ATTACHMENT 2 RESTRICTED IRAN COMPANIES SECURITIES OF COMPANIES MAY NOT BE PURCHASED FOR PORTFOLIO

COMPANY NAME Bharat Petroleum Corporation Ltd. China Petroleum & Chemical Corp Daelim Industrial Gail (India) Ltd. Gazprom GS Engineering & Construction Corp	COUNTRY India China South Korea India Russia South Korea
GS Holdings	South Korea
Gubre Fabrikalari T.A.S. Ina-Industrija Nafte DD	Turkey Croatia
Indian Oil Corporation Ltd. Liquefied Natural Gas Ltd	India Australia
Marie Tecnimont S.p.A. Mitsui & Co. Ltd	Italy Japan
Nagarjuna Fertilizers & Chemicals Ltd.	India India
Oil & Natural Gas Corporation Ltd. PetroChina Co. Ltd. Punj Lloyd Ltd.	China India
Toyota Tsusho Corporation	Japan

Effective Date: December 17, 2013