

**MINNESOTA
STATE
BOARD OF
INVESTMENT**



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**Governor
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**State Auditor
Julie Blaha**

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Steve Simon**

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Keith Ellison**

**Executive Director
& Chief Investment
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Mansco Perry

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DATE: January 31, 2019

TO: Minnesota Legislative Reference Library

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 specifies that the SBI include in the report a:

1. Correspondence with companies:
 - Summary of individual, parent and subsidiary companies with active business operations in Iran; and
 - SBI letters (templates) sent to Iran scrutinized companies by type of company with active business operations as well as correspondence received from the company.
2. List of prohibited investments.
3. List of all investments divested.
4. 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 Institutional Shareholder Services, Inc. (ISS).

During the 2018 calendar year, there were 66 companies added to the restricted list, 29 companies removed from the restricted list, and 7 companies added to the divestment list.

Attachment 1 displays a list of restricted (i.e. scrutinized) Iran companies sent to SBI equity and bond managers. The managers are explicitly instructed to refrain from purchasing securities of companies on this list.

Attachment 2 displays the current list of companies requiring divestment. 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. For the 2018 calendar year, there was a total of 1,118,241 shares liquidated and a total of 11 companies in the divestment process.

Enclosures

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State Board of Investment (SBI)

Minnesota Statutes 11A.244

Investment in Iran

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11A.244 INVESTMENT IN IRAN.

Subdivision 1. **Definitions.** (a) For the purposes of this section, the following terms have the meanings given them in this subdivision.

(b) "Active business operations" means all business operations that are not inactive business operations.

(c) "Company" means any sole proprietorship, organization, association, corporation, partnership, joint venture, limited partnership, limited liability partnership, limited liability company, or other entity or business association, including all wholly owned subsidiaries, majority-owned subsidiaries, parent companies, or affiliates of such entities or business associations, that exists for profit-making purposes.

(d) "Direct holdings" means all publicly traded debt and equity securities of a company that are held directly by the State Board of Investment or held in an account or fund in which the State Board of Investment owns all shares or interests.

(e) "Government of Iran" means the government of the Islamic Republic of Iran or its instrumentalities or political subdivisions and companies owned or controlled by the Islamic Republic of Iran.

(f) "Inactive business operations" means the continued holding or renewal of rights to property previously operated for the purpose of generating revenues but not presently deployed for such a purpose.

(g) "Indirect holdings" means all investments held in an account or fund, including a mutual fund, a real estate fund, a private equity fund, or a commingled fund, managed by one or more persons who are not employed by the State Board of Investment, in which the public funds own shares or interests together with other investors who are not subject to this section.

(h) "Scrutinized company" means any company engaging in scrutinized business operations.

(i) "Scrutinized business operations" means any and all active business operations that are subject or liable to sanctions under Public Law 104-172, as amended, the Iran Sanctions Act of 1996, and that involve the maintenance of a company's existing assets or investments in Iran, or the deployment of new investments to Iran that meet or exceed the \$20,000,000 threshold referred to in Public Law 104-172, as amended, the Iran Sanctions Act of 1996. "Scrutinized business operations" does not include the retail sale of gasoline and related products.

(j) "Substantial action specific to Iran" means adopting, publicizing, and implementing a formal plan to cease scrutinized business operations within one year and to refrain from any such new business operations.

Subd. 2. **Identification of scrutinized companies.** (a) Within 90 days following August 1, 2009, the State Board of Investment shall make its best efforts to identify all scrutinized companies in which it has direct holdings. These efforts shall include, as appropriate:

(1) reviewing and relying, as appropriate, on publicly available information regarding companies with business operations in Iran, including information provided by nonprofit organizations, research firms, international organizations, and government entities;

(2) contacting asset managers contracting with the State Board of Investment who invest in companies with business operations in Iran; and

(3) contacting other institutional investors that have divested from or engaged with companies with business operations in Iran.

(b) At the first meeting of the State Board of Investment after it has completed the requirements of paragraph (a), the State Board of Investment shall assemble a list of scrutinized companies in which it has direct holdings.

(c) The State Board of Investment shall update the scrutinized companies list each quarter based on continuing information, including but not limited to information from sources identified in paragraph (a).

Subd. 3. **Engagement of scrutinized companies.** The State Board of Investment shall use the following procedures with respect to companies on the scrutinized companies list:

(1) for each company newly identified in subdivision 2 with scrutinized business operations, the State Board of Investment shall, within 90 days following its assembly of the scrutinized companies list, send a written notice informing the company of its scrutinized company status and that it may become subject to divestment by the State Board of Investment. The notice shall offer the company the opportunity to clarify its scrutinized business operations and shall encourage the company to cease, within 90 days of the date of the notice, its scrutinized business operations, or to convert them to inactive business operations in order to avoid divestment by the State Board of Investment; and

(2) if, within 90 days following the State Board of Investment's first engagement with a company under clause (1), that company publicly announces its commitment to substantial action specific to Iran, that company shall be removed from the scrutinized companies list and the provisions of this section shall cease to apply to it unless it resumes active business operations in Iran.

Subd. 4. **Divestment.** (a) If, after 90 days following the State Board of Investment's first engagement with a company under subdivision 3, clause (1), the company continues to have scrutinized business operations, and only while the company continues to have scrutinized business operations, the State Board of Investment shall sell, redeem, divest, or withdraw all publicly traded securities of the company, according to the following schedule:

(1) at least 50 percent of the holdings in the company shall be removed from the State Board of Investment's assets under management by nine months after the company's initial appearance on the scrutinized companies list; and

(2) 100 percent of the holdings in the company shall be removed from the State Board of Investment's assets under management within 15 months after the company's initial appearance on the scrutinized companies list.

(b) If a company that ceased scrutinized business operations following engagement under subdivision 3, clause (1), resumes such operations, paragraph (a) immediately applies to the company and the State Board of Investment shall send a written notice to the company. The company shall also be immediately reintroduced onto the scrutinized companies list.

Subd. 5. **Prohibition on new acquisitions.** The State Board of Investment may not acquire securities of companies on the scrutinized companies list that have scrutinized business operations, except as provided in this section.

Subd. 6. **Relation to federal action.** If the federal government excludes a company from its present or any future federal sanctions relating to Iran, that company is exempt from the divestment requirements and the investment prohibitions in this section.

Subd. 7. **Exemptions.** Subdivisions 4 and 5 do not apply to any of the following:

(1) investments in a company that is primarily engaged in supplying goods or services intended to relieve human suffering in Iran;

(2) investments in a company that is primarily engaged in promoting health, education, or journalistic, religious, or welfare activities in Iran; and

(3) investments in a United States company that is authorized by the federal government to have active business operations in Iran.

Subd. 8. **Excluded securities.** Subdivisions 4 and 5 do not apply to indirect holdings in actively managed investment funds. The State Board of Investment shall submit letters to the managers of investment funds containing companies with scrutinized active business operations requesting the managers to consider removing such companies from the fund or to create a similar actively managed fund with indirect holdings that do not include the companies. If a manager creates a similar fund, the State Board of Investment shall promptly replace all applicable investments with investments in the similar fund consistent with prudent investing standards. For the purposes of this section, "private equity" funds shall be deemed to be actively managed investment funds.

Subd. 9. **Reporting.** By January 15 of each calendar year, the State Board of Investment shall submit a report to the chairs and ranking minority members of the legislative committees and divisions with jurisdiction over the State Board of Investment. The report must include:

(1) a copy of the most recent list of scrutinized companies;

(2) a summary of correspondence with companies engaged by the State Board of Investment under subdivision 3;

(3) a list of all investments sold, redeemed, divested, or withdrawn in compliance with subdivision 4;

(4) a list of all prohibited investments under subdivision 5; and

(5) a description of any progress made under subdivision 8.

Subd. 10. **Expiration.** This section ceases to be operative if either of the following apply:

(1) Iran is removed from the United States Department of State's list of countries that have been determined to repeatedly provide support for acts of international terrorism; or

(2) the president of the United States determines and certifies that state legislation similar to this section interferes with the conduct of United States foreign policy.

Subd. 11. **Other legal obligations.** The State Board of Investment is exempt from any statutory or common law obligations that conflict with actions taken in compliance with this section, including all good faith determinations regarding companies as required by this section, including any obligations regarding the choice of asset managers, investment funds, or investments for the State Board of Investment's securities portfolios.

Subd. 12. **Severability.** The provisions of this section are severable. If any provision of this section or its application is held invalid, that invalidity does not affect other provisions or applications that can be given effect without the invalid provision or application.

History: 2009 c 90 s 1

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State Board of Investment (SBI)

2018

**Summary of Correspondence
with Iran Scrutinized Companies**

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**Minnesota State Board of Investment
Correspondence with Iran Scrutinized Companies
2018 Calendar Year Quarterly Activity**

Scrutinized Company Name	Country (Company Location)	Quarter	Date of Letter Sent by the SBI	Type of Letter Sent (parent/subsidiary/individual)	Response Received from Scrutinized Company
Hyundai Engineering & Construction	South Korea	4Q 2017	1/5/2018	Individual Company Letter	No response received as of 1/18/2019.
Hyundai Motor Group	South Korea	4Q 2017	1/5/2018	Individual Company Letter	Yes, letter received on 4/2/2018.
Indian Oil Company (parent company)	India	2Q 2018	9/19/2018	Parent Company Letter	No response received as of 1/18/2019.
Chennai Petroleum Corporation Ltd. (subsidiary of Indian Oil Company)	India	2Q 2018	9/19/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Lanka Ioc Limited (subsidiary of Indian Oil Company)	Sri Lanka	2Q 2018	9/19/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Daelim Industrial (parent company)	South Korea	2Q 2018	9/19/2018	Parent Company Letter	Yes, letter received on 11/2/2018.
Daelim C&S Co. Ltd (subsidiary of Daelim Industrial)	South Korea	2Q 2018	9/20/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Korea Development Corporation (subsidiary of Daelim Industrial)	South Korea	2Q 2018	9/18/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Samho International Co. Ltd. (subsidiary of Daelim Industrial)	South Korea	2Q 2018	9/19/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Total S.A. (parent company)	France	2Q 2018	9/19/2018	Parent Company Letter	Yes, letter received on 10/12/2018.
Total Petroleum Ghana (subsidiary of Total S.A.)	Ghana	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).
Total Gabon (subsidiary of Total S.A.)	Gabon	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company) and Total Gabon on 10/22/2018.
Total Cote d'Ivoire SA (subsidiary of Total S.A.)	Ivory Coast	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).
Total Maroc S. A. (subsidiary of Total S.A.)	Morocco	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).
Total Nigeria Plc (subsidiary of Total S.A.)	Nigeria	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).

**Minnesota State Board of Investment
Correspondence with Iran Scrutinized Companies
2018 Calendar Year Quarterly Activity**

Scrutinized Company Name	Country (Company Location)	Quarter	Date of Letter Sent by the SBI	Type of Letter Sent (parent/subsidiary/individual)	Response Received from Scrutinized Company
SunPower Corporation (subsidiary of Total S.A.)	United States	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from SunPower Corporation and letter received on 10/12/2018 from Total SA (parent company).
PJSC Tatneft (parent company)	Russia	2Q 2018	9/19/2018	Parent Company Letter	No response received as of 1/18/2019.
Bank Zenit (subsidiary of PJSC Tatneft)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
PetroChina Company Ltd. (parent company)	China	2Q 2018	9/19/2018	Parent Company Letter	No response received as of 1/18/2019.
Kunlun Energy Co Ltd. (subsidiary of PetroChina Company Ltd)	China	2Q 2018	9/19/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
LG International (parent company)	South Korea	2Q 2018	9/19/2018	Parent Company Letter	No response received as of 1/18/2019.
LG Corp (subsidiary of LG International)	South Korea	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/2/2018.
Hyundai Mobis	South Korea	2Q 2018	9/19/2018	Individual Company Letter	No response received as of 1/18/2019.
Toyota Motor Corporation	Japan	2Q 2018	9/19/2018	Individual Company Letter	Yes, letter received on 12/18/2018.
Gazprom OAO (parent company)	Russia	2Q 2018	9/19/2018	Parent Company Letter	Yes, letter received on 10/11/2018.
Gaz Capital SA (subsidiary of Gazprom OAO)	Luxembourg	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Centerenergyholding JSC (subsidiary of Gazprom OAO)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Energetiki I Elektrifikacii Mosenergo (subsidiary of Gazprom OAO)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Gazprom Neft (subsidiary of Gazprom OAO)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Miejregiontoplosetenergomont (subsidiary of Gazprom OAO)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
OJSC Gazprom Gas Distribution Belorod (subsidiary of Gazprom OAO)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).

**Minnesota State Board of Investment
Correspondence with Iran Scrutinized Companies
2018 Calendar Year Quarterly Activity**

Scrutinized Company Name	Country (Company Location)	Quarter	Date of Letter Sent by the SBI	Type of Letter Sent (parent/subsidiary/individual)	Response Received from Scrutinized Company
Second Generating Co Wholesale Power Market (subsidiary of Gazprom OAO)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Territorial Generating Company 1 (subsidiary of Gazprom OAO)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Wholesale Generating Company 2 (subsidiary of Gazprom OAO)	Russia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
NIS a.d. Novi Sad (subsidiary of Gazprom OAO)	Serbia	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Daewoo Engineering & Construction (parent company)	South Korea	2Q 2018	9/19/2018	Parent Company Letter	No response received as of 1/18/2019.
Korea Development Bank (subsidiary of Daewoo & Engineering & Construction)	South Korea	2Q 2018	9/19/2018	Subsidiary Company Letter	Yes, letter received on 12/14/2018.
China Petroleum & Chemical Corp (parent company)	China	2Q 2018	9/20/2018	Parent Company Letter	No response received as of 1/18/2019.
Sinopec Kantons Holding Ltd. (subsidiary of China Petroleum & Chemical Corp)	Hong Kong	2Q 2018	9/20/2018	Subsidiary Company Letter	Yes, letter received on 12/19/2018.
Sinopec Shanghai Petrochemical Co. Ltd. (subsidiary of China Petroleum & Chemical Corp)	China	2Q 2018	9/20/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Bharat Petroleum Corp Ltd (parent company)	India	3Q 2018	10/12/2018	Parent Company Letter	No response received as of 1/18/2019.
BPRL International Singapore Ltd. (subsidiary of Bharat Petroleum Corp Ltd)	Singapore	3Q 2018	10/12/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
China Petroleum & Chemical Corp (parent company)	China	3Q 2018	10/12/2018	Parent Company Letter	No response received as of 1/18/2019.
Sinopec Capital Ltd (subsidiary of China Petroleum & Chemical Corp)	Hong Kong	3Q 2018	10/12/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Sinopec Engineering (Group) Co. Ltd.	China	3Q 2018	10/12/2018	Individual Company Letter	No response received as of 1/18/2019.
Norinco Intl Cooperation Ltd.	China	3Q 2018	10/12/2018	Individual Company Letter	No response received as of 1/18/2019.
Toyota Industries Corp.	Japan	3Q 2018	10/22/2018	Individual Company Letter	Yes, letter received on 12/27/2018.

**Minnesota State Board of Investment
Correspondence with Iran Scrutinized Companies
2018 Calendar Year Quarterly Activity**

Scrutinized Company Name	Country (Company Location)	Quarter	Date of Letter Sent by the SBI	Type of Letter Sent (parent/subsidiary/individual)	Response Received from Scrutinized Company
Gazprom OAO (parent company)	Russia	3Q 2018	10/15/2018	Parent Company Letter	Yes, letter received on 10/11/2018.
Gazpromneft-Tyumen OAO (subsidiary of Gazprom)	Russia	3Q 2018	10/15/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Gazpromneft-Yaroslavl (subsidiary of Gazprom)	Russia	3Q 2018	10/15/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Mosneftprodukt JSC (subsidiary of Gazprom)	Russia	3Q 2018	10/15/2018	Subsidiary Company Letter	Yes, letter received on 10/11/2018 from Gazprom OAO (parent company).
Total S.A. (parent company)	France	3Q 2018	10/22/2018	Parent Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).
Direct Energie (subsidiary of Total SA)	France	3Q 2018	10/22/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).
Total Capital Canada Ltd. (subsidiary of Total SA)	Canada	3Q 2018	10/22/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).
Total Capital International SA (subsidiary of Total SA)	France	3Q 2018	10/22/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).
Total Capital SA (subsidiary of Total SA)	France	3Q 2018	10/22/2018	Subsidiary Company Letter	Yes, letter received on 10/12/2018 from Total SA (parent company).
Bharat Petroleum Corp Ltd (parent company)	India	4Q 2018	12/31/2018	Parent Company Letter	No response received as of 1/18/2019.
Kochi Refineries Ltd. (subsidiary of Bharat Petroleum Corp Ltd)	India	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
China Petroleum & Chemical Corp (parent company)	China	4Q 2018	12/31/2018	Parent Company Letter	No response received as of 1/18/2019.
Caspian Investment Resources (subsidiary of China Petroleum & Chemical Corp)	Kazakhstan	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Pan-Ocean Energy Corporation Limited (subsidiary of China Petroleum & Chemical Corp)	Jersey	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Addax Petroleum (subsidiary of China Petroleum & Chemical Corp)	Switzerland	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Sinopec Yangzhi Petrochemical Company Limited (subsidiary of China Petroleum & Chemical Corp)	China	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.

**Minnesota State Board of Investment
Correspondence with Iran Scrutinized Companies
2018 Calendar Year Quarterly Activity**

Scrutinized Company Name	Country (Company Location)	Quarter	Date of Letter Sent by the SBI	Type of Letter Sent (parent/subsidiary/individual)	Response Received from Scrutinized Company
Sinopec Beijing Yanhua Petrochemical Company Limited (subsidiary of China Petroleum & Chemical Corp)	China	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Sinopec Zhenghai Refining & Chemical Co. Ltd. (subsidiary of China Petroleum & Chemical Corp)	China	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
PetroChina Company Ltd. (parent company)	China	4Q 2018	12/31/2018	Parent Company Letter	No response received as of 1/18/2019.
Singapore Petroleum Company Limited (subsidiary of PetroChina Company)	Singapore	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Jilin Chemical Industrial Company Limited (subsidiary of PetroChina Company)	China	4Q 2018	12/31/2018	Subsidiary Company Letter	No response received as of 1/18/2019.
Odfjell Drilling Ltd. (parent company)	Norway	4Q 2018	1/2/2019	Parent Company Letter	No response received as of 1/18/2019.
Odfjell Invest Ltd. (subsidiary of Odfjell Drilling Ltd.)	Norway	4Q 2018	1/2/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Gazprom OAO (parent company)	Russia	4Q 2018	1/4/2019	Parent Company Letter	No response received as of 1/18/2019.
Gazprom International SA (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Gazstream (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Gazprom gazoraspredeleenie Bryansk (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Gazprom gazoraspredeleenie Penza (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Gazprom gazoraspredeleenie Rostov-na-Donu (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Gazprom gazoraspredeleenie Smolensk (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Gazprom Neftekhim Salavat JSC (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Sibneft Omsknefteproduct OAO (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.

Minnesota State Board of Investment
Correspondence with Iran Scrutinized Companies
2018 Calendar Year Quarterly Activity

Scrutinized Company Name	Country (Company Location)	Quarter	Date of Letter Sent by the SBI	Type of Letter Sent (parent/subsidiary/individual)	Response Received from Scrutinized Company
SOYUZ Bank JSC (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Volgogzoapparat OAO (subsidiary of Gazprom)	Russia	4Q 2018	1/4/2019	Subsidiary Company Letter	No response received as of 1/18/2019.
Linde Plc	Ireland	4Q 2018	1/2/2019	Individual Company Letter	Yes, letter received on 1/9/2019.

State Board of Investment (SBI)

Examples of Letters sent to Iran Scrutinized Companies

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Example of Individual Company Letter Sent to Iran Scrutinized Companies

**MINNESOTA
STATE
BOARD OF
INVESTMENT**



Board Members:

Governor
Mark Dayton

State Auditor
Rebecca Otto

Secretary of State
Steve Simon

Attorney General
Lori Swanson

**Executive Director
& Chief Investment
Officer**

Mansco Perry

*60 Empire Drive
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*E-mail:
minn.sbi@state.mn.us*

*Website:
<http://mn.gov/sbi>*

*An Equal Opportunity
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[Date]

[Chairman or CEO Name]
[Company Name]
[Address]
[City, State or Country, Postal Code]

Dear [Contact Name]:

The Minnesota State Board of Investment (MSBI) is writing to you as required by provisions of Minnesota Statutes, section 11A.244, which concerns investments in companies with business operations in Iran.

The law of Minnesota Statute, section 11A.244, attached, requires the MSBI to identify and engage with all "scrutinized companies" in which the MSBI has direct investments. The Board utilizes the Institutional Shareholder Services (ISS) as its source for this information.

[Company Name] has been identified by ISS as a company with active business operations in Iran. The MSBI encourages [Company Name] to either cease its scrutinized business operations or convert such operations to inactive business operations. The MSBI requests that you clarify to us in writing, by [Due Date – 90 days from date of letter], your current Iran-related business operations.

If [Company Name] chooses not to comply with our request, the legislation clearly calls for a phased divestment of any securities related to your company that the MSBI owns.

Please note that the investment restrictions of the Minnesota law do not apply if your company is authorized by the U.S. government to do business in Iran.

Please send a written response to:

LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN 55103-3555

Please contact our office at (651) 296-3328 or minn.sbi@state.mn.us if you have any questions.

Sincerely,

LeaAnn M. Stagg
Assistant Executive Director and
Chief Operating Officer

Enclosure

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Example of Parent Company Letter Sent to Iran Scrutinized Companies

**MINNESOTA
STATE
BOARD OF
INVESTMENT**



Board Members:

Governor
Mark Dayton

State Auditor
Rebecca Otto

Secretary of State
Steve Simon

Attorney General
Lori Swanson

**Executive Director
& Chief Investment
Officer**

Mansco Perry

*60 Empire Drive
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minn.sbi@state.mn.us*

*Website:
<http://mn.gov/sbi>*

*An Equal Opportunity
Employer*

[Date]

[Chairman or CEO Name]
[Parent Company Name]
[Address]
[City, State or Country, Postal Code]

Dear [Contact Name]:

The Minnesota State Board of Investment (MSBI) is writing to you as required by provisions of Minnesota Statutes, section 11A.244, which concerns investments in companies with business operations in Iran.

The law of Minnesota Statute, section 11A.243, attached, requires the MSBI to identify and engage with all “scrutinized companies” in which the MSBI has direct investments. The Board utilizes the Institutional Shareholder Services (ISS) as its source for this information.

[Parent Company Name] and its subsidiaries mentioned below have been identified by ISS as companies with active business operations in Iran.

Companies Identified by ISS as Scrutinized Companies:

Parent Company: [Parent Company Name] [Country]

Subsidiary Companies:

- [Subsidiary Company Name] [Country]
- [Subsidiary Company Name] [Country]

Please note that a letter will be sent to each subsidiary company listed above. A copy of the subsidiary company letters are attached.

The MSBI encourages **[Parent Company Name]** and its subsidiaries to either cease their scrutinized business operations or convert to inactive business operations. The MSBI requests that you clarify to us in writing, by **[Due Date- 90 day from letter date]**, your current Iran-related business operations and any future plans the company may have relating to your Iran operations.

If **[Parent Company Name]** chooses not to comply with our request, the legislation clearly calls for a phased divestment of any securities related to your company that the MSBI owns.

Please send a written response to:

LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN 55103-3555

Please contact me at (651) 296-3328 if you have any questions.

Sincerely,

LeaAnn M. Stagg
Assistant Executive Director and
Chief Operating Officer

Enclosures

Example of Subsidiary Company Letter Sent to Iran Scrutinized Companies

**MINNESOTA
STATE
BOARD OF
INVESTMENT**



Board Members:

Governor
Mark Dayton

State Auditor
Rebecca Otto

Secretary of State
Steve Simon

Attorney General
Lori Swanson

**Executive Director
& Chief Investment
Officer**

Mansco Perry

*60 Empire Drive
Suite 355
St. Paul, MN 55103
(651) 296-3328*

Fax: (651) 296-9572

*E-mail:
minn.sbi@state.mn.us*

*Website:
<http://mn.gov/sbi>*

*An Equal Opportunity
Employer*

[Date]

[Chairman or CEO Name]
[Company Name]
[Address]
[City, State or Country, Postal Code]

Dear [Contact Name]:

The Minnesota State Board of Investment (MSBI) is writing to you as required by provisions of Minnesota Statutes, section 11A.244, which concerns investments in companies with business operations in Iran.

The law of Minnesota Statute, section 11A.244, attached, requires the MSBI to identify and engage with all "scrutinized companies" in which the MSBI has direct investment. The Board utilizes the Institutional Shareholder Services (ISS) as its source for this information.

As a subsidiary of [Parent Company Name], a "scrutinized" company under the targeted Iran divestment legislative model, [Subsidiary Company Name] has been added to ISS's Iran Company Report as a scrutinized company.

The MSBI encourages [Parent Company Name] and its subsidiaries to cease their scrutinized business operations or convert to inactive business operations. The MSBI requests that you clarify to us in writing, by [Due Date – 90 day from letter date], your or your parent company's current Iran-related business operations.

If [Parent Company Name]/[Subsidiary Company Name] chooses not to comply with our request, the legislation clearly calls for a phased divestment of any securities related to your company that the MSBI may own.

Please note that the investment restrictions of the Minnesota law do not apply if your company is authorized by the U.S. government to do business in Iran.

Please send a written response to:

LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN 55103-3555

Please contact our office at (651) 296-3328 or minn.sbi@state.mn.us if you have any questions.

Sincerely,

LeaAnn M. Stagg
Assistant Executive Director and
Chief Operating Officer

Enclosure

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State Board of Investment (SBI)

Response Letters Received from Iran Scrutinized Companies

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October 31, 2018

VIA EMAIL: minn.sbi@state.mn.us

Ms. LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, Minnesota, 55103
Attn: Iran Divestment

Subject: Response to Letter and Request for Delisting

Dear Ms. Stagg:

I am writing in response to your September 18, 2018 letter concerning Daelim Industrial Co., Ltd.'s ("Daelim") previous business operations in Iran. Because Daelim has ceased scrutinized business operations in Iran and has implemented a formal plan to refrain from any such new business operations in Iran, Daelim requests that the Minnesota State Board of Investment ("MSBI") remove Daelim from its list of companies engaged in scrutinized business operations in Iran ("Scrutinized Companies List") pursuant to Minnesota Statutes, section 11A.244, Investment in Iran. Daelim also requests that its subsidiary Korea Development Corporation not be added to the Scrutinized Companies List. Neither Daelim nor Korea Development Corporation engages in scrutinized business operations in Iran. Daelim and its subsidiaries are committed to complying with U.S. federal and Minnesota sanctions. Because neither Daelim nor Korea Development Corporation meets the criteria for listing under Minnesota's Investment in Iran statute, Daelim respectfully requests that MSBI not include Daelim or Korea Development Corporation on its Scrutinized Companies List.

Daelim is engaging in a state-by-state effort to correct the record that Daelim does not engage in business activities in Iran and to request delisting under state sanctions laws. The State of New York recently conducted an independent review of Daelim's cessation of business activities in Iran and decided to delist Daelim. As of September 26, 2018, Daelim is no longer listed as a scrutinized company in New York.¹

No Scrutinized Business Operations

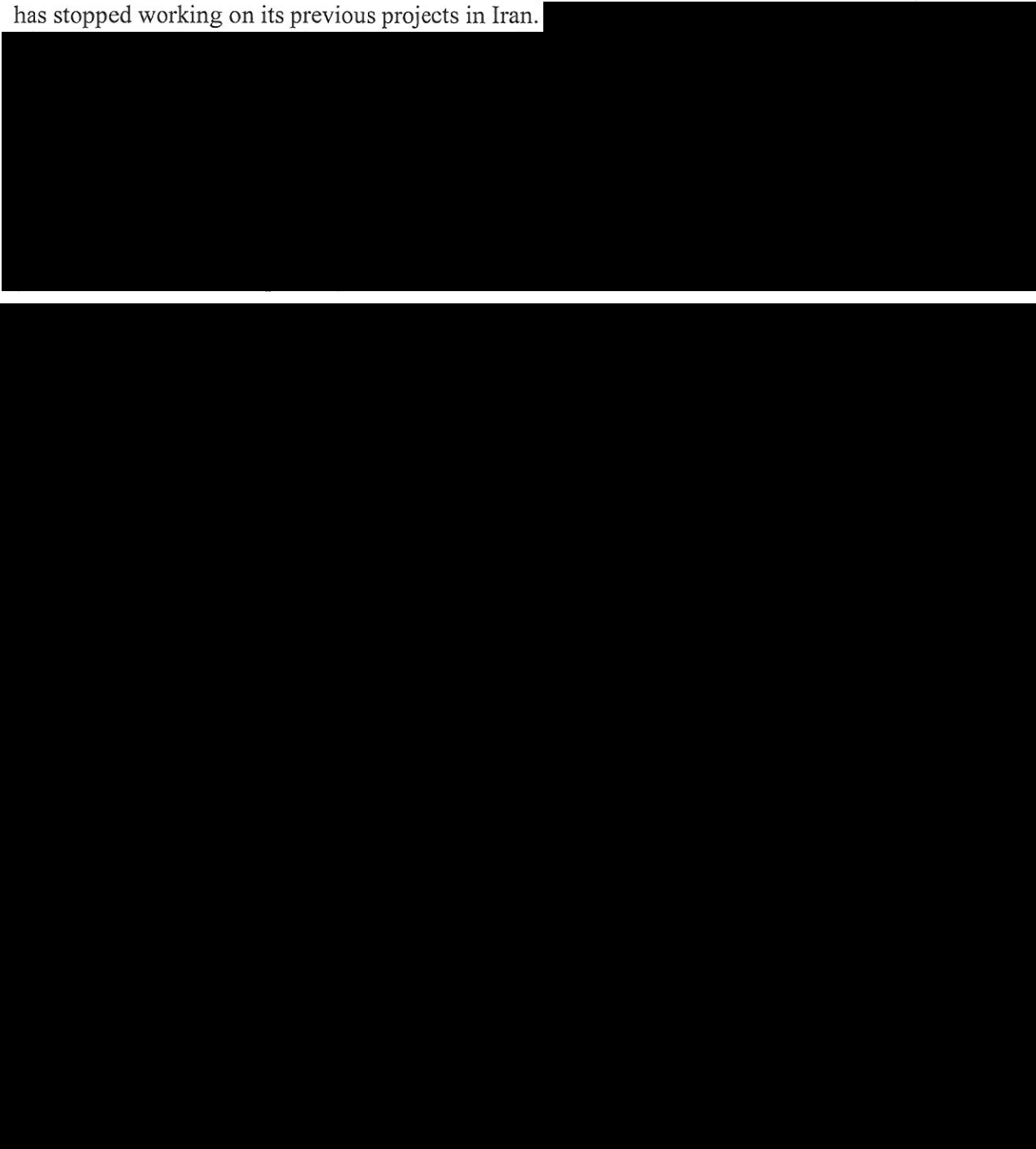
¹ State of New York, Executive Department Office of General Services, *Entities determined to be non-responsive bidders/offers pursuant to The New York State Iran Divestment Act of 2012* (Sept. 26, 2018), <https://www.ogs.ny.gov/about/regs/docs/ListofEntities.pdf>.

CONTAINS DAELIM BUSINESS CONFIDENTIAL AND PROPRIETARY INFORMATION

This letter and its attachments are exempt from public disclosure pursuant to the Minnesota Data Practices Act (Minn. Stat. §§ 13.01 *et seq.*) and the Minnesota Uniform Trade Secrets Act (Minn. Stat. §§ 325C.01). This letter and its attachments are also exempt from release under the federal Freedom of Information Act (5 U.S.C. § 552(b)(4)) and the Trade Secrets Act (18 U.S.C. § 1905). Daelim requests that this disclosure and its attachments be withheld in the event of a demand for disclosure and that, in the event of such a demand, we request prompt notice of such a request and an opportunity to be heard prior to taking any action to disclose.

This section is exempt from disclosure because it contains trade secrets, including under Minnesota's Uniform Trade Secrets Act, chapter 3205.01.

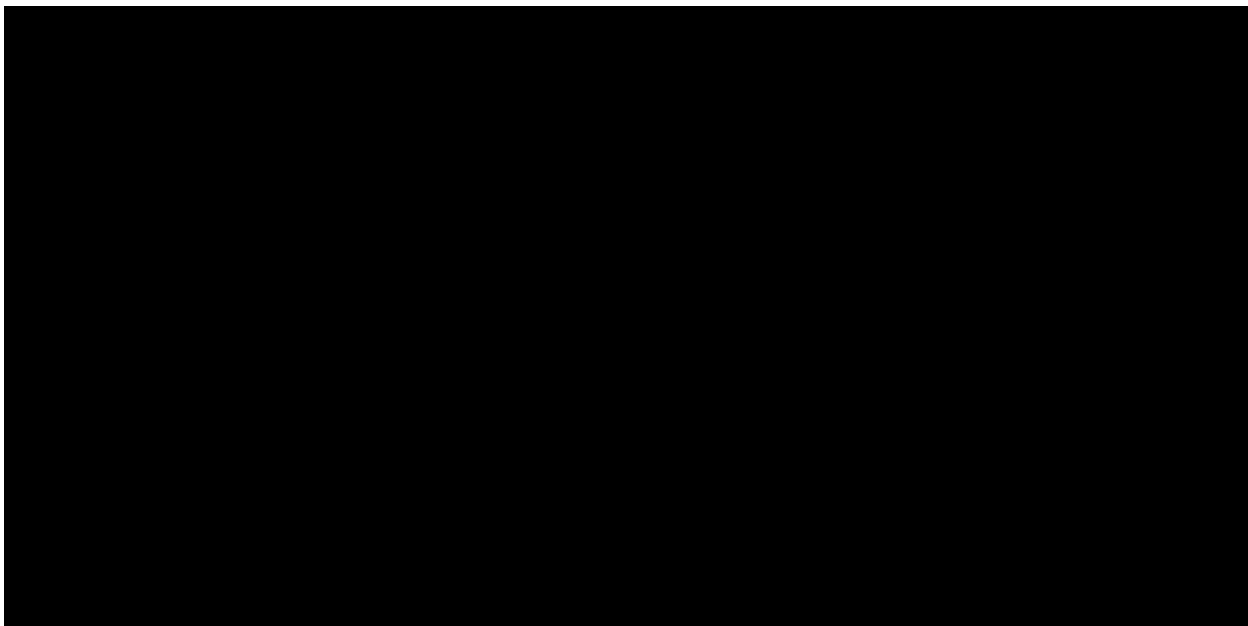
Daelim has ceased all scrutinized business operations in Iran. As detailed below, Daelim has stopped working on its previous projects in Iran.



² Daelim's submission to the Financial Supervisory Service on the Data Analysis, Retrieval and Transfer System, notifying South Korean authorities of the Esfahan project's cessation, is available at <http://dart.fss.or.kr/dsaf001/main.do?rcpNo=20180601800611>. Because this government submission is only available in Korean, we have enclosed a translated version.

Based on the activities described above, Daelim does not meet the criteria for listing under Minnesota law and respectfully requests that it be removed from the Scrutinized Companies List.

Substantial Action Specific to Iran



Daelim also has publicized its cessation of business operations in Iran. As stated above, Daelim notified the South Korean government that it had cancelled the new Esfahan project's contract, which had not yet entered into force due to lack of financing and concerns of renewed U.S. sanctions on Iran. Daelim's cessation of business operations in Iran also has received media coverage, with articles discussing Daelim's public announcement that it ceased business activities in Iran.³

Similar Delisting Activities

In recognition of Daelim's cessation of business operations in Iran and plan to refrain from new business operations in Iran, the State of New York removed Daelim from its list of scrutinized companies on September 26, 2018. New York's Iran sanctions statute is similar to Minnesota's statute. New York conducted an independent review, determined that Daelim no longer engages in scrutinized business operations in Iran, and removed Daelim from New York's list of scrutinized companies. Daelim is contacting other states and third-party research companies to correct the

³ Yonhap News, *Daelim revokes 2.2-tln-won deal with Iranian oil company in wake of reinstated U.S. sanctions* (June 1, 2018), <http://english.yonhapnews.co.kr/business/2018/06/01/0502000000AEN20180601012800315.html>; Mehr News, *S Korea's Daelim cancels \$2.08bn order from Iran for fear of sanctions* (June 2, 2018), <https://en.mehrnews.com/news/134503/S-Korea-s-Daelim-cancels-2-08bn-order-from-Iran-for-fear-of>; Reuters, *South Korea's Daelim industrial says \$2.08 billion order from Iran canceled* (June 1, 2018), <https://www.reuters.com/article/us-daelim-ind-iran/south-koreas-daelim-industrial-says-2-08-billion-order-from-iran-canceled-idUSKCN1IX44G>.

October 31, 2018
Page 4 of 4

record that Daelim does not engage in business activities in Iran, and hopes that other states will delist Daelim soon.

Daelim is committed to full compliance with U.S. and Minnesota sanctions laws. Daelim has ceased scrutinized business operations in Iran and has implemented a policy prohibiting it and its subsidiaries from engaging in any scrutinized business operations in Iran. Because Daelim and Korea Development Corporation do not meet the criteria for listing under Minnesota's sanctions law, Daelim respectfully requests that MSBI not include Daelim or Korea Development Corporation on its Scrutinized Companies List.

If you have any questions or need additional information, please contact us at +82 (0)2-2011-7499 or hjchoi@daelim.co.kr or our U.S. outside counsel at Arnold & Porter, John B. Bellinger III (202-942-6599 or John.Bellinger@arnoldporter.com), Emma K. Dinan (202.942.5485 or Emma.Dinan@arnoldporter.com), or Alexandra Barbee-Garrett (202-942-5291 or Alexandra.Barbee-Garrett@arnoldporter.com).

Sincerely,



Hyuk Joon Choi

*Vice President & General Counsel
Legal and Compliance Office
Daelim Industrial Co., Ltd.*

Enclosure

CONTAINS DAELIM BUSINESS CONFIDENTIAL AND PROPRIETARY INFORMATION

Cancellation of Single Sale/Supply Contract

1. Category of Sale/Supply Contract Cancellation		Construction Order
- Name of the Cancelled Contract		Iran Esfahan Refinery Upgrading Project
2. Breakdown of Cancellation	Cancelled Amount (Won)	2,233,401,291,044
	Recent Revenue (Won)	9,513,673,300,027
	In Relation to Revenue (%)	23.48
	Large Corporation	Applicable
3. Contract Counterpart		Esfahan Oil Refining Company
- Relationship to the Company		-
4. Contract Period	Start Date	-
	End Date	-
5. Primary Reason(s) for Cancellation		Contract was invalidated due to failure to complete financing, which is the precondition to effecting the contract, as a result of worsening external conditions including economic sanctions against Iran.
6. Date of Cancellation		May 31, 2018
7. Details Relating to Deferral of Public Notice	Reason(s) for Deferral	-
	Period of Deferral	-
8. Other Important Detail(s) Relating to Investment Decisions		<p>* Above cancelled amount is the total contract amount that was translated into Won. - Contract amount: EUR 1,827,152,258 - Applied exchange rate: EUR 1 = 1,222.34 Won (The first official basic rate of exchange on March 10, 2017)</p> <p>* Above cancelled amount includes provisional contract price EUR 150,000,000.</p> <p>* Above recent revenue is according to the 2015 consolidated financial statements.</p> <p>* Above contract period is 48 months from the effective date.</p> <p>* The construction was to promote increased production of high value products by installing additional facilities to the refinery facilities operating in Esfahan, Iran, and the company</p>

	<p>was expected to perform designing, material purchasing, construction and financing assistance functions.</p> <p>* Above date of cancellation is the deadline for financing, which is the precondition to effecting the contract.</p>	
	<p>Related Public Notice(s)</p>	<p>December 29, 2016 Important Management Matters Relating to Investment Decisions March 13, 2017 Conclusion of a Single Sale/Supply Contract</p>



**Публичное акционерное общество
«Газпром»**

(ПАО «Газпром»)

ул. Напеткина, д. 16, Москва, ГСП-7, 117997
тел.: (495) 719-30-01, факс: (495) 719-83-33, телекс: 411467 GAZ RU
e-mail: gazprom@gazprom.ru, www.gazprom.ru

**Public Joint Stock Company
Gazprom**

(PJSC Gazprom)

Nametkina st., 16, Moscow, GSP-7, Russia, 117997
tel.: +7 (495) 719-30-01, fax: +7 (495) 719-83-33, telex: 411467 GAZ RU
e-mail: gazprom@gazprom.ru, www.gazprom.ru

«10» October 2018 г.

№ 05-1059



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№ 05-1059

**Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN 55103-3555**

Dear Mr. Stagg,

Please find below information in response to your letter dd. September 19, 2018 regarding Gazprom Group current Iran-related business operations.

We participated in a project to develop the second and third phases of the South Pars field, located in the Iranian segment of the Persian Gulf with a total investment of more than U.S. \$2 billion. We held a 30% interest in the project. The other participants in this project were Total, which held a 40% interest, and Petronas, a Malaysian company, which held a 30% interest. In 1998, the U.S. Department of State waived otherwise applicable sanctions with respect to the investment made by our partners and us in Iran's South Pars field under Section 9(c) of the Iran and Libya Sanctions Act of 1996 (the «Sanctions Act»). The waiver continues to apply to our activities in the South Pars field only, and not to any other activities that we may conduct. The National Iranian Oil Company («NIOC») was making payments to the project participants for construction works from 2002 through 2010. However, in 2010, the settlement payments were suspended because of the strengthening of the sanctions regime against Iran. In January 2016, some of the U.S. and the EU sanctions with respect to Iran have been suspended or lifted, and we have collected the debt from NIOC in 2017.

In January 2016, the U.S. and the EU amended their respective sanctions regimes against Iran. As a result, portions of the U.S. and the EU sanctions programs with respect to Iran have been suspended or lifted. However, the remaining sanctions continue to prohibit certain transactions with Iran.

In March 2006, we entered into a 25-year agreement with the Armenian government. In 2009, pursuant to the agreement, CJSC Gazprom Armenia (formerly CJSC ArmRosGazprom), which is currently our wholly owned

subsidiary, completed the construction and refurbishment of the approximately 188 km long second section of the Iran-Armenia pipeline. CJSC Gazprom Armenia («Gazprom Armenia») owns this section of the pipeline. In 2009, the Armenian government, the owner of the approximately 40 km long first section of the pipeline, leased the first section of the pipeline to Gazprom Armenia. Currently, Gazprom Armenia transports gas through the pipeline that the Armenian state-owned company obtains from Iran in exchange for electricity supplies. In addition, Gazprom Armenia uses a portion of this gas at its power generation facilities (Razdan-5) to produce electricity, which is subsequently supplied to the Armenian state-owned company.

In 2009, Gazprom Neft entered into a Memorandum of understanding with NIOC, providing for potential participation of Gazprom Neft in the development of certain fields in Iran. Gazprom Neft has not performed any work in relation to implementation of any projects contemplated by the Memorandum.

In December 2016, Gazprom Neft signed a Memorandum of understanding with NIOC, which, among other things, envisages that Gazprom Neft will conduct a study of certain data to assess the prospects of possible cooperation in the development of the oil fields in Iran. Gazprom Neft is currently performing analysis of data received from NIOC.

In December 2016, Gazprom signed with National Iranian Gas Company («NIGC») a Memorandum of understanding outlining possible areas of cooperation. In addition, in March 2017, Gazprom signed with NIOC a Memorandum of understanding pursuant to which the parties intend to assess the prospects of cooperation in exploration and production of hydrocarbons in Iran.

In June 2017, Gazprom Neft signed with OMV a Memorandum of understanding outlining mutual interest to cooperate in Iran. In particular, the cooperation may include preliminary analysis, assessment and study of oil fields and cooperation on other business opportunities in Iran.

In July 2017, Gazprom Neft signed with Iranian Oil Industries Engineering & Construction Company (OIEC) a Memorandum of understanding confirming the mutual interest for preliminary assessment and study of the geological potential of oil fields in Iran. The Memorandum doesn't grant Gazprom Neft any exclusive rights and doesn't restrict Gazprom Neft from conducting negotiations with third parties.

In November 2017, Gazprom signed with the Islamic Republic of Iran Ministry of Petroleum a Memorandum of understanding on strategic cooperation and inked with NIOC a Memorandum of understanding for cooperation in upstream, gas transportation and processing. Besides that Gazprom and NIOC concluded a Memorandum of understanding to collaborate on the construction project for the Iran — Pakistan — India gas pipeline. The Memorandum is based on the Memorandum of understanding signed by the Russian Ministry of Energy and the Iranian Petroleum Ministry as part of the state support for the pipeline construction project. In addition, Gazprom and Industrial Development and Renovation Organization of Iran (IDRO) at the same day signed a Memorandum of

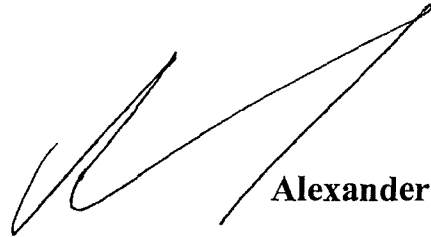
understanding on cooperation in deep gas processing, gas chemistry and liquefaction.

In December 2017, Gazprom and NIOC signed a Roadmap Protocol aimed at implementation of the abovementioned memoranda of understanding inked with Iranian Petroleum Ministry and NIOC in November 2017. Besides that Gazprom, NIOC and Oil Industry Pension, Saving and Staff Welfare Fund (Iran) signed a Memorandum of understanding for the project of construction of LNG plan in Iran.

We believe that this letter contains a full and accurate summary of our business activities in Iran.

Yours sincerely,

**Deputy Chairman
of the Management Committee**

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized representation of the name Alexander Medvedev.

Alexander Medvedev

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Ms. LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
Suite 355, 60 Empire Drive
St. Paul, MN 55103

March 27, 2018

Dear Ms. Stagg,

We appreciate your taking an interest in our company, and having gone so far as to include our shares in your investment portfolio. As a corporation we always have, and will continue to work in the best interest of our investors. Your concerns are very important to us.

We received your letter dated January 5th, 2018, and would like to take this opportunity to try and address your concerns and clarify any misunderstandings that may exist. As an initial matter, we note that your letter was addressed to Hyundai Motor Group; however, no legal entity exists under that name. We expect that you intended to address the letter to Hyundai Motor Company and we are responding to your letter on behalf of Hyundai Motor Company.

It seems to us that, as per the “Minnesota Statutes, section 11A.244” that you were kind enough to attach, “scrutinized business operations” are business operations that are: (1) “subject or liable to sanctions under... the Iran Sanctions Act of 1996 [(“ISA”)]” of the United States of America, and (2) involve investments or asset-maintenance activities that meet or exceed the \$20,000,000 threshold referred to in the ISA.

We would like to clarify two points in this regard. First, due to the U.S. implementation of the Joint Comprehensive Plan of Action in January 2016, many U.S. secondary sanctions have been waived.¹ In particular, the U.S. government has stated that “the following activities by non-U.S. persons are no longer sanctionable: ... Investment, including participation in joint ventures, goods, services, information, technology and technical expertise and support for Iran’s oil, gas, and petrochemical sectors...,” and to that end has “[w]aived the imposition of menu-based sanctions under...Section 5(a) of ISA...”² Section 5(a) of the ISA had previously subjected to secondary sanctions an investment of \$20 million or more which “directly and significantly contributes to the enhancement of Iran’s ability to develop petroleum resources.” Given that the second prong of the definition in the Minnesota Statutes section 11A.244 only includes as “scrutinized business operations” investments or asset-maintenance activities that meet or exceed the \$20 million threshold in the ISA Section 5(a), and the ISA Section 5(a) has been waived, it seems to us that such investments no longer trigger the definition of the Minnesota statute. In

¹ See U.S. Department of State and Treasury, Guidance Relating to the Lifting of Certain U.S. Sanctions Pursuant to the Joint Comprehensive Plan of Action on Implementation Day (January 16, 2016), *available at* https://www.treasury.gov/resource-center/sanctions/Programs/Documents/implement_guide_jcpoa.pdf.

² See *id.*, at pp. 13 and 15.



other words, the 2016 waiver of the ISA Section 5(a) appears to preclude the application of the second prong of the definition in the Minnesota statute. In any case, we do not believe that the sale and provision of automotive products and related services by Hyundai Motor Company can be categorized as investments that directly and significantly contribute to the enhancement of Iran's ability to develop petroleum resources.

Second, we understand that the relevant business operations that continue to be subject to secondary sanctions under the ISA -- and hence which could trigger the first prong of the Minnesota statute's definition of "scrutinized business operation" -- are only those business activities that involve dealing with the Islamic Revolutionary Guard Corps ("IRGC") or another Specially Designated National ("SDN") of Iran.³ Hyundai Motor Company is not engaged in dealings with any such parties.

If you nonetheless believe that any activities of Hyundai Motor Company could constitute "scrutinized business operations" under the Minnesota statute, we would greatly appreciate it if you could explain your understanding of the current application of this statute after the waiver of many U.S. secondary sanctions in 2016 (including ISA Section 5(a)), and how any specific activities of Hyundai Motor Company may be subject to such current application of the statute.

In addition, for your background information, we inform you that the concept of a Group in Korea comes from the designation of a "Group" by the Korea Fair Trade Commission of certain affiliated companies with assets exceeding certain threshold amounts. As stated above, no legal entity under the name of "Hyundai Motor Group" exists and all affiliate companies of Hyundai Motor Company are legally separate and independent companies. If your understanding, however, is that another affiliate company of Hyundai Motor Company may be engaged in any "scrutinized business operations" under the Minnesota statute, Hyundai Motor Company is willing, solely as a special courtesy to you although no such duty exists, to assist you in your communications with such affiliated companies. In this regard, we would greatly appreciate if you let us know the names of such affiliate companies and the nature of the specific activities that you consider may be subject to the statute.

Thank you again for your interest, and we look forward to hearing back from you soon.

Sincerely,

A handwritten signature in black ink that reads "Dong Wook Kim".

Kim, Dong Wook

Senior Vice President

Hyundai Motor Company

³ *Id.* at p. 41.

December 13, 2018

LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN 55103-3555

Dear LeaAnn M. Stagg,

This letter is in reference to your letter dated September 19, 2018, which concerns business operations of Daewoo Engineering & Construction (“DEC”) in Iran.

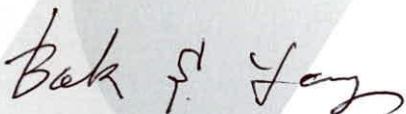
DEC is one of the affiliate companies of The Korea Development Bank (“KDB”), not KDB’s parent company. KDB currently owns 50.7% of equity interest in DEC through “KDB Value PEF VI”, one of its subsidiaries.

DEC has clarified to KDB in writing that it has ended its business operations in Iran in order to avoid possible sanctions by the U.S. Department of State under the Iran Sanctions Act or other potentially applicable federal sanctions. DEC also stated that it has terminated all the MOUs for the projects related to Iran and has determined not to engage in any sanctionable activity as long as the Iran Sanctions Act is in effect, and that it has closed down its representative office located in Iran to keep its business operations in compliance with the sanctions.

Note that KDB is well aware of applicable sanctions (including U.S. secondary sanctions) and regulations or policies adopted by governmental entities in the U.S. and by U.S. institutions (such as universities and pension funds) prohibiting transactions with or investment in entities doing business with Iran, and KDB carefully screens transactions to ensure that any transaction will not result in a breach of UN and US OFAC sanctions.

Sincerely,

For and on behalf of The Korea Development Bank



Bok Seung Yang
General Manager
Treasury Department
The Korea Development Bank

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From: 양수하/책임
To: [MN_SBI_Minn_SBI](#)
Subject: LG Corp. (Re. MSBI's letter dated 9/19)
Date: Tuesday, October 02, 2018 3:06:23 AM
Attachments: [semi-annual report excerpt LG International.pdf](#)

Dear Ms. Stagg,

This is Sue Yang and I am an in-house counsel at LG Corp.

I write this email in response to MSBI's letter dated September 19, 2018, regarding a matter related to Minnesota Statutes on Investment in Iran (11A.244).

Please allow me to take this opportunity to clarify some of the facts. First of all, LG Corp. is a holding company without any independent business operations, including any Iran-related operations. Secondly, LG Corp. is not a subsidiary of LG International. Rather, LG International is one of the companies LG Corp. holds shares of. Currently, LG Corp. holds 25% of LG International's shares. Importantly, LG International is a listed company, independent from LG Corp.

For your information, I've attached an excerpt (unfortunately, only available in Korean) from LG International's semi-annual report dated August 14, 2018, which can be found at the Korea's official site called DART (Data Analysis, Retrieval and Transfer System) at <http://dart.fss.or.kr>. Please find below translation of the first paragraph under VII. 1. (1).

"On the day of submitting this report, the largest shareholder of the Company [LG International] is LG Corp. having 9,571,336 shares(24.69%). Including shares of the affiliated persons, the shares are 10,199,290(26.31%)."

I hope the presented information is helpful to MSBI's assessment of this matter. Please let us know if there are any other clarifications LG Corp. should make in regard to the issues MSBI raised within the September letter.

Thanks.

Sue

양수하 | Sue Yang
책임/미국 변호사 | Legal Counsel (Admitted in NY)
LG Corp. 법무/준법지원팀 | Legal/Compliance Team
LG Twin Towers, 128 Yeoui-daero, Yeongdeungpo-gu
Seoul 07336, Korea
T. +82-2-3773-2351

상기 메시지의 첨부파일 내에는 비밀정보가 포함되어 있을 수 있으며, 지정된 수신자 및 참조자에 한하여 조회 및 사용될 수 있습니다. 만약 송신자의 실수로 인하여 상기메시지를 수신하였다면, 송신자에게 메시지를 반송해 주시고, 원본메시지와 모든 사본을 폐기해 주시기 바랍니다. 상기 메시지의 전체 또는 일부에 대해 무단 열람, 사용, 공개, 배포하는 것은 금지되어 있습니다. (주)LG

NOTICE : This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. If you have received this communication in error, please contact the sender immediately, and delete this communication from any computer or network system. LG Corp.

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Making our world more productive



The Priestley Centre
10 Priestley Road
The Surrey Research Park
Guildford, Surrey GU2 7XY
United Kingdom

January 9, 2019

LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN 55103-3555

Re: Letter dated January 2, 2019

Dear Ms. Stagg:

Thank you for your letter dated January 2, 2019. This is to confirm that Linde plc complies with all applicable laws and regulations regarding the imposition of economic and trade sanctions on countries and entities.

As of November 4, 2018, Linde AG, a subsidiary of Linde plc, has wound down all operations in Iran and do not contemplate any new business in or with Iran. Consequently, Linde plc currently has no active business operation in or with Iran and has no plans for any new business operations in Iran in the future.

We trust above information will serve its purpose. Should you require any further information please feel free to reach out directly to me at Fabricio_nunes@praxair.com or at (203) 837-2311.

Sincerely,


Fabricio S. Nunes
Chief Compliance Officer

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中石化冠德控股有限公司

SINOPEC KANTONS HOLDINGS LIMITED

INCORPORATED IN BERMUDA WITH LIMITED LIABILITY

December 19, 2018

Ms. LeaAnn M. Stagg
Assistant Executive Director and
Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive
Suite 355
St. Paul, MN 55103

Dear Ms. Stagg,

We refer to your letter dated 20 September, 2018 addressed to Sinopec Kantons Holdings Limited (Sinopec Kantons).

Under applicable law of Minnesota's statute, section 11A.244, Minnesota State Board of Investment reviews "scrutinized companies," defined as companies engaging in "scrutinized business activities." Scrutinized business activities are active business operations which are subject to sanctions under Public Law 104-172, as amended, the Iran Sanctions Act of 1996 and involve investments or maintenance of existing assets in Iran meeting or exceeding the USD20,000,000 threshold. We affirm our position we have not been engaged in any scrutinized business activities in Iran. We respectfully request that Sinopec Kantons be removed forthwith from ISS's Iran Company Report as a scrutinized company.

Sinopec Kantons is an independent legal and listed entity conducting its own business activities despite its ultimate connection with China Petroleum & Chemical Corporation (Sinopec Corp), that is., a subsidiary of Sinopec Corp. It would be a tall order for Sinopec Kantons to be fully aware of all business operations of Sinopec Corp as its controlling shareholder. Regarding business of Sinopec Corp, we suggest you access to annual report of Sinopec Corp on Form 20-F for the year ended 31 December, 2017 via website of <http://www.sinopec.com/listco/en/Resource/Pdf/2018042802.pdf>.



中石化冠德控股有限公司

SINOPEC KANTONS HOLDINGS LIMITED

INCORPORATED IN BERMUDA WITH LIMITED LIABILITY

Should you have any further enquiries, we are pleased to elaborate and dispel misunderstandings you may have.

Sincerely,

.....
Mr. Ye Zhijun
Managing Director
Sinopec Kantons Holdings Limited

SUNPOWER®

October 4, 2018

Via Federal Express:

LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN 55103-3555

Dear Ms. Stagg:

In reference to the Minnesota State Board of Investment's letter to SunPower Corporation (the "Company"), dated as of September 19, 2018, please refer to the Company's public filings with regard to the items requested therein.

Please contact me with any questions.

Sincerely,



Kenneth Mahaffey
Executive Vice President and General Counsel

RECEIVED OCT 12 2018

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Paris, October 10, 2018

MINNESOTA STATE BOARD of INVESTMENT

Mrs. LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
60 Empire Drive – Suite 355
Saint Paul, MN 55103
USA
Email: minn.sbi@state.mn.us

Dear Mrs. Stagg,

We received your letter dated September 19, 2018, sent to Total S.A. regarding activities in Iran. We hereby provide a consolidated response for TOTAL S.A. and its subsidiaries and affiliates (collectively, "TOTAL" or the "Group"). TOTAL continually monitors its activities to ensure full compliance with applicable laws and regulations, including international economic sanctions.

Information concerning certain limited activities of the Group in Iran is reported in TOTAL S.A.'s annual report on Form 20-F filed with the SEC. For TOTAL's most recent disclosure, refer to pages 83-86 of Exhibit 15.1 to the 2017 Form 20-F filed on March 16, 2018.

TOTAL's main source of revenue linked to Iran has been the purchase of Iranian crude, which started in February 2016, until June 2018. These purchases started following the suspension of certain international economic sanctions against Iran on January 16, 2016.

On July 3, 2017, TOTAL, together with its partners CNPC and Petropars, executed the contract related to the proposed South Pars 11 gas development project, in full compliance with UN resolutions and US, EU and French legislations applicable at the time.

On May 8, 2018, US President Donald Trump announced the United States' decision to withdraw from the JCPOA and reinstated some secondary US sanctions that were in force before the JCPOA's implementation, subject to certain wind-down periods. Total has always been very clear that it cannot afford to be exposed to US secondary sanctions.

Accordingly, TOTAL is currently in the process of winding down all its business operations in Iran by November 4, 2018.



We hope this letter provides you with a better understanding of TOTAL's position in Iran, and we are available to further discuss these points and respond to any additional questions you may have. Please do not hesitate to contact me should you have any questions.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "M. Sangster".

Mike Sangster
SVP, Investor Relations

LeeAnn M Stagg
Assistant Executive Director and
Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive - Suite 355
ST Paul, MN 55103-3555
USA

Libreville, October 19, 2018

Ref : **DAS/2018-197/PG**
RE: **MSBI Iran divestment legislative model**

Dear Mrs. Stagg,

We are in receipt of your letter dated 19 September 2018 regarding the issue of Total Gabon's inclusion in the Institutional Shareholder Services (ISS) Iran Company Report as a "scrutinized" company.

Total Gabon does not have any business operations, contracts, revenues or assets linked to the government of Iran, or companies or projects owned by the government of Iran.

The company's activities consist of the exploration, development and production of oil & gas within the Republic of Gabon. Our production is sold to our sister company TOTSA or to the SOGARA refinery located in Port-Gentil. Our partners, contractors and service providers do not include companies with a material link to Iran. Further information on Total Gabon can be found on our website or in our annual report, on this link:

<http://www.total.ga/lentreprise/rapports-financiers/rapport-financier-annuel-2017>.

As you know, Total Gabon is a company listed in Paris on the Euronext stock exchange, owned by the Total Group (58.28%), the Gabonese Republic (25%) and other shareholders (16.72%). With regards to our majority investor Total SA and its inclusion as a "scrutinized" company, please contact the Investor Relations team at Total SA directly at ir@total.com.

We hope this clarifies Total Gabon's position vis-a-vis the MSBI's statues 2017. We are at your disposal should you have any further questions.

Yours sincerely,

Chief Executive Officer



Henri-Max NDONG-NZUE

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December 26, 2018

Ms. LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN 55103-3555
U.S.A.

Dear Ms. LeaAnn M. Stagg:

On behalf of Toyota Industries Corporation (“TICO”), I am writing to acknowledge TICO’s receipt of the letter from the Minnesota State Board of Investment (“MSBI”) (dated October 12th, 2018) and to respond to the questions contained therein. According to the letter, MSBI is seeking information regarding whether TICO maintains “active business operations in Iran.”

Under the definition provided in section 11A.244, TICO does not maintain operations that meet the definition of “scrutinized business operations.” According to the definition found in section 11A.244, Subdivision 1 (i), a “scrutinized business operation” means activities that are prohibited by the Iran Sanctions Act of 1996 “that involve the maintenance of a company’s existing assets or investments in Iran, or the deployment of new investments to Iran that meet or exceed the \$20,000,000 threshold referred to in Public Law 104-172.”

TICO’s Iran-related activities do not meet this requirements. TICO’s involvement with Iran is only tangential, and involves the sale of goods – entirely consistent with all U.S. laws, including the Iran Sanctions Act of 1996 – by a non-U.S. affiliate, Uster Technologies AG. (“Uster”). Uster is TICO’s non-U.S. subsidiary, separately incorporated in Switzerland, which does not maintain any assets or investments in Iran. The sole involvement of Uster with Iran is a limited number of exports of Yarn Testing Instruments, Yarn Clearers and Fiber Cleaning Instruments and spare parts to Iran. These goods are produced outside of Iran and do not require the maintenance of any assets or investments to support these sales. Further, these limited sales occupy only a small part of the consolidated sales in TICO group companies (approximately 0.007 percent of TICO group sales).

TICO stresses that all Uster exports are in complete compliance with U.S. sanction laws related to Iran, including the full list of sanctions maintained by the Office of Foreign Assets Control, the May 8th, 2018 National Security Presidential Memorandum Relating to the Joint Comprehensive Plan of Action (“JCPOA”) and the “snapback” of all U.S. sanctions against Iran, and all secondary sanctions maintained by the Department of State in the wake of the withdrawal from the JCPOA. More specifically, the small amount of Uster Iran-related sales involve non-U.S.-origin goods, which are sold without the involvement of any U.S. persons, any use of the U.S. financial system, or any support or facilitation from any U.S. person. None of the Uster sales involve any Specially Designated Nationals or other designated persons, the Government of Iran, any Iranian military, intelligence, or police interests, or any business sector targeted for secondary sanctions.

Under section 11A.244, Subdivision 4, divestment only occurs for companies that maintain “scrutinized business operations.” Since neither TICO nor any of its affiliates meet this definition, there are no grounds for divestment of TICO or any of its affiliated companies.

If you have any questions, please let us know.

Respectfully submitted



Hiroshi Fukagawa

Managing Officer

Toyota Industries Corporation

TOYOTA

HEAD OFFICE
1, TOYOTA-CHO, TOYOTA,
AICHI, 471-8571, JAPAN
TEL : +81-565-28-2121

TOYOTA MOTOR CORPORATION

TOKYO HEAD OFFICE
4-18, KORAKU 1-CHOME, BUNKYO-KU,
TOKYO, 112-8701, JAPAN
TEL : +81-3-3817-7111

BUSINESS CONFIDENTIAL

BY EXPRESS COURIER AND ELECTRONIC MAIL

December 14, 2018

LeaAnn M. Stagg
Assistant Executive Director and Chief Operating Officer
Minnesota State Board of Investment
60 Empire Drive, Suite 355
St. Paul, MN
55103-3555
United States of America
E-mail: minn.sbi@state.mn.us

Re: Letter to Toyota Motor Corporation Dated September 19, 2018

Dear Ms. Stagg:

Thank you for your letter of September 19, 2018 on behalf of the Minnesota State Board of Investment ("MSBI") in which the MSBI requests written clarification from Toyota Motor Corporation ("TMC" or "Toyota") regarding Toyota's current Iran-related business operations pursuant to Minnesota Statutes section 11A.244 ("the Act"). On behalf of TMC, I am pleased to respond to your letter regarding the Act and to provide the below information, which I believe responds fully to your inquiry. This letter is timely submitted by December 18, 2018.

As described in more detail below, TMC respectfully submits that it should not be considered a "scrutinized company" because it does not engage in "scrutinized business activities" as these terms are defined in the Act.

I. OVERVIEW OF TOYOTA MOTOR CORPORATION

As you are aware, Toyota is a global automotive company which also is active in finance and other industries. Toyota's automotive operations include the design, manufacture, assembly and sale of passenger cars, trucks and vans and commercial vehicles and related parts and accessories. Toyota's financial services business consists primarily of providing financing to dealers and their customers for the purchase or lease of Toyota vehicles. Toyota sells its vehicles in approximately 190 countries and regions. Toyota's primary markets for its automobiles are Japan, North America, Europe and Asia. Toyota sold over 8.9 million vehicles in fiscal year 2018.

Toyota and its U.S. affiliate companies are a major U.S. auto producer with 10 U.S. plants and over 33,000 direct U.S. employees producing over 1 million vehicles a year in the United States. Toyota has 17 independently owned Minnesota dealerships and 2 Lexus dealerships employing just under 2,000 of Minnesota employees selling our vehicles to Minnesota customers.

In March 2011, Toyota unveiled its "Toyota Global Vision" corporate outline for the future, which serves to give direction to Toyota employees, distributors, and dealers around the world. Toyota has implemented a number of policies intended to further the realization of this vision. This includes the fulfillment of Toyota's global responsibilities which the company believes can only be achieved through full observance of corporate ethics and compliance with applicable laws and regulations. To this end, Toyota is committed to compliance with all applicable laws, including U.S. and non-U.S. economic sanctions against Iran and other countries. Toyota has procedures and contractual commitments in place to help prevent unauthorized sales.

II. ANALYSIS OF DIVESTMENT CRITERIA SET FORTH IN THE ACT

As described in more detail below, Toyota has reviewed the specific criteria for divestment set forth in the Act as outlined in the above-referenced letter dated September 18, 2018, and respectfully submits that Toyota does not conduct any activities that subject it to divestment action by the MSBI under the Act or that warrant identifying Toyota as a "scrutinized company" for purposes of the Act.

First, separate from an assessment of the specific criteria for divestment set forth in the Act, TMC does not have any subsidiaries or affiliates of any kind in Iran and does not maintain any offices, facilities or employees in Iran. Toyota does not export any products or technology to Iran and has not made any capital investment in Iran. And, needless to say, the government of Iran does not have any equity share in any Toyota entity.

Second, and with respect to the specific criteria set forth in the Act, Toyota understands that the MSBI is required to divest from companies that continue to engage in scrutinized business operations after engagement by the MSBI. TMC does not conduct any such operations. Subdivision 1(i) of the Act defines "scrutinized business operations" to mean, in relevant part:

"any and all active business operations that are subject or liable to sanctions under Public Law 104-172, as amended, the Iran Sanctions Act of 1996, and that involve the maintenance of a company's existing assets or investments in Iran, or the deployment of new investments to Iran that meet or exceed the \$20,000,000 threshold referred to in Public Law 104-172, as amended, the Iran Sanctions Act of 1996."

The Iran Sanctions Act of 1996, as amended ("the ISA," Pub. L. 104-172), imposes sanctions for a variety of activities, primarily those involving Iran's energy sector or its development of weapons of mass destruction. To summarize, the activities targeted by the ISA include:

- Section 5(a):
 - Development of petroleum resources of Iran
 - Production of refined petroleum products
 - Exportation of refined petroleum products to Iran
 - Joint ventures with Iran relating to developing petroleum resources
 - Support for the development of petroleum resources and refined petroleum products in Iran
 - Development and purchase of petrochemical products from Iran
 - Transportation of crude oil from Iran
 - Concealing Iranian origin of crude oil and refined petroleum products
- Section 5(b):
 - Exports, transfers, and transshipments of specified goods, services, or technology relating to Iran's ability to acquire or develop chemical, biological, or nuclear weapons, or destabilizing numbers and types of advanced conventional weapons
 - Joint ventures relating to the mining, production, or transportation of uranium
 - Specified activities relating to the transfer of nuclear technology

Toyota does not conduct any of the types of activities described above in relation to Iran. TMC also does not have any existing assets or investments in Iran and is not deploying any new investments to Iran.

Third, contrary to the statements in the letter received from the MSBI, TMC does not have any "business operations in Iran." As disclosed to the U.S. Securities and Exchange Commission ("SEC") in accordance with applicable law, certain Toyota subsidiaries have conducted very limited activities related to Iran in third countries (i.e., outside of Iran). For example, during the fiscal year ended March 31, 2018, Toyota Kirloskar Motor Private Limited, a majority-owned subsidiary of Toyota, sold one Toyota vehicle to the Iranian Embassy in India. TMC did not have any Iran-related activities requiring disclosure in its annual report to the SEC for fiscal years 2016 or 2017. Toyota is of the view that this type of limited sale of a commercial vehicle to the Iranian Embassy in India should not be considered as "business operations in Iran."

Based on the foregoing, Toyota respectfully submits that it does not engage in "scrutinized business operations" and therefore should neither be considered a "scrutinized company" nor be subject to divestment under the Act.

III. REQUEST FOR ACTION

Therefore, Toyota respectfully submits that requiring divestment from TMC would be inconsistent with the specific criteria set forth in the Act, contrary to any policy objective served by the Act, and wholly contrary to Toyota's role as a major U.S. company and employer.

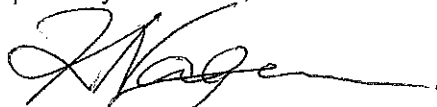
As such, Toyota respectfully requests that the MSBI confirm that: (i) it is not required to divest its publicly traded securities in TMC; and (ii) TMC is not a "scrutinized company" for purposes of the Act.

...

Toyota looks forward to continuing this constructive engagement with your office. Please contact us at the following address if you require any additional information on this matter.

Attention: Takao Nakagawa
Project General Manager
External & Public Affairs Div.
Toyota Motor Corporation
4-18, Koraku 1-chome, Bunkyo-ku, Tokyo
112-8701 Japan
TEL:
+81-(0)565-23-0651
+81-(0)3-3817-9920
Fax: +81-3-3817-9017
Email: takao_n@mail.toyota.co.jp

Respectfully submitted,



Kazuo Naganuma
General Manager
General Manager, Global Relation Dept.
External & Public Affairs Div.
Toyota Motor Corporation

State Board of Investment (SBI)

List of Iran Prohibited (Restricted) Investments

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ATTACHMENT 1

RESTRICTED IRAN COMPANIES

Securities of companies may not be purchased for portfolio

COMPANY NAME	COUNTRY
Sinopec Kantons Holdings Ltd.	Bermuda
China Petroleum & Chemical Corp	China
Jilin Chemical Industrial Co., Ltd.	China
Norinco Intl Cooperation Ltd	China
PetroChina Co. Ltd.	China
SINOPEC Beijing Yanhua Petrochemical Co. Ltd.	China
Sinopec Engineering (Group) Co Ltd	China
Sinopec Shanghai Petrochemical Co. Ltd.	China
Sinopec Yangzi Petrochemical Co., Ltd.	China
Sinopec Zhenhai Refining & Chemical Co. Ltd.	China
Linde AG	Germany
Sinopec Capital Ltd.	Hong Kong
Bharat Petroleum Corporation Ltd.	India
Chennai Petroleum Corporation Ltd.	India
Indian Oil Corporation Ltd.	India
Kochi Refineries Ltd.	India
Kunlun Energy Co Ltd.	India
Oil & Natural Gas Corporation Ltd.	India
Linde Plc	Ireland
Maire Tecnimont S.p.A.	Italy
Mitsui & Co. Ltd	Japan
Toyo Engineering Corporation	Japan
Toyota Industries Corp.	Japan
Toyota Motor Corporation	Japan
Toyota Tsusho Corporation	Japan
Pan-Ocean Energy Corp. Ltd.	Jersey
Caspian Investments Resources Ltd.	Kazakhstan
Daewoo Engineering & Construction	Korea South
GS Engineering & Construction Corp	Korea South
Hyundai Engineering & Construction	Korea South
Hyundai Mobis	Korea South
Hyundai Motor	Korea South
Gaz Capital SA	Luxembourg
Gazprom International SA	Luxembourg
Gazstream SA	Luxembourg
Odfjell Drilling Ltd	Norway

RESTRICTED IRAN COMPANIES

Securities of companies may not be purchased for portfolio

COMPANY NAME	COUNTRY
Odfjell Invest Ltd.	Norway
Centerenergyholding	Russia
Energetiki I Elektrifikacii Mosenergo	Russia
Gazprom gazoraspredelenie Bryansk	Russia
Gazprom gazoraspredelenie Penza	Russia
Gazprom gazoraspredelenie Rostov-na-Donu	Russia
Gazprom gazoraspredelenie Smolensk	Russia
Gazprom Neftekhim Salavat JSC	Russia
Gazprom OAO	Russia
Second Generating Co. Wholesale Power Market PJSC	Russia
Sibneft Omsknefteproduct OAO	Russia
SOYUZ Bank JSC	Russia
Territorial Generating Company No.1	Russia
Volgogazoapparat OAO	Russia
Wholesale Generation Co.-2	Russia
BPRL International Singapore Pte Ltd.	Singapore
Singapore Petroleum Co. Ltd.	Singapore
The Korea Development Bank	South Korea
Lanka Ioc Limited	Sri Lanka
Addax Petroleum Corp.	Switzerland
Gubre Fabrikalari T.A.S.	Turkey

Revised: January 24, 2019

Effective Date:

January 24, 2019

Source: Institutional Shareholder Services/ISS

State Board of Investment (SBI)

List of Iran Companies Requiring Divestment

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ATTACHMENT 2

LIST OF IRAN COMPANIES REQUIRING DIVESTMENT

Company Name	Country of Origin	Divest 50 Percent by this Date	Divest 100 Percent by this Date
Hyundai Engineering & Construction	South Korea	9/30/2018	3/31/2019
Hyundai Motor	South Korea	9/30/2018	3/31/2019
Toyota Motor Corp.	Japan	3/31/2019	9/30/2019
Hyundai Mobis Co	South Korea	3/31/2019	9/30/2019
Toyota Industries Corp.	Japan	6/30/2019	12/31/2019

Effective Date: December 31, 2018