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DATE: January 29, 2024
TO: Minnesota Legislative Reference Library
FROM: Jill E. Schurtz
Executive Director and Chief Investment Officer

SUBJECT: Report on Investment in 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. Summary of correspondence with companies engaged by the SBI as outlined in statute.
2. Recent list of scrutinized companies that are unauthorized for purchase. The SBI's scrutinized companies list is the same list used for companies prohibited for purchase.
3. List of all companies removed from the portfolio to comply with statute.
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 retains Institutional Shareholder Services, Inc. (ISS) to provide Iran research services regarding companies with business operations in Iran.

During the 2023 calendar year, the SBI added one company to the unauthorized holdings list and 17 companies were removed.

Attachment 1 displays the summary of correspondence by the SBI to the scrutinized Iran companies in which the SBI has direct holdings. For the 2023 calendar year, the SBI had holdings in two scrutinized Iran companies.

Attachment 2 displays the unauthorized (i.e. scrutinized) list of Iran companies sent to the SBI's equity and bond investment managers. The managers are explicitly instructed to refrain from purchasing securities of companies on this list.

Attachment 3 displays the current list of Iran 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 2023 calendar year, at the end of the fourth quarter, there were two companies on the SBI's Iran restricted list held in the Combined Funds portfolio, the Russian company Gazprom PJSC and the Chinese company PetroChina Co LTD.

Gazprom PJSC was scheduled for divestment to commence December 31, 2022; however, no market currently exists because Russian securities are restricted from trading due to sanctions imposed by the United States, Russia, or other governments. Despite continued efforts, the liquidation manager was unable to find a market to sell this security during the quarter. As a result, no shares of restricted companies held in the portfolio were sold during the fourth quarter.

PetroChina Co. LTD is scheduled for 50% divestment by March 31, 2024.

Enclosures

ATTACHMENT 1

**Minnesota State Board of Investment
Summary of Correspondence with Iran Scrutinized Companies
2023 Calendar Year Quarterly Activity**

Scrutinized Company Name	Country (Company Location)	Quarter	Date of Letter Sent by the SBI	Response Received from Scrutinized Company
PetroChina Company Ltd.	China	2Q2023	6/26/2023	No response received.

ATTACHMENT 2

**Minnesota State Board of Investment
List of Unauthorized (Scrutinized) Iran Companies
As of December 31, 2023
4Q 2023**

Company Name	Country
China Petroleum & Chemical Corporation	China
Gaz Capital SA*	Luxembourg
Gaz Finance Plc*	United Kingdom
Gazprom Capital OOO*	Russia
Gazprom Gazoraspredelenie Rostov-na-Donu OJSC*	Russia
Gazprom International SA*	Luxembourg
Gazprom Neft PJSC*	Russia
Gazprom Neftekhim Salavat JSC*	Russia
Gazprom PJSC*	Russia
Gazpromneft Yaroslavl*	Russia
Gazstream SA*	Luxembourg
Gubre Fabrikalari TAS	Turkey
Mezhregionteplosetenergozemont PJSC*	Russia
Moscow Integrated Power Co.*	Russia
Mosenergo OAO*	Russia
Penzagazifikatsiya OAO*	Russia
PetroChina Company Limited	China
SINOPEC Engineering (Group) Co., Ltd.	China
Territorial Generating Co. No 1 PJSC*	Russia
Toyo Engineering Corp.	Japan
Volgogazoapparat OAO*	Russia

***Currently also on the SBI's Russian/Belarus restricted list**

ATTACHMENT 3

**Minnesota State Board of Investment
List of Iran Companies Requiring Divestment
Calendar Year 2023**

Company Name	Country
PetroChina Company Limited	China
Gazprom PJSC*	Russia

***Currently also on the SBI's Russian/Belarus restricted list**