

**Maryland State Retirement and Pension System**  
**Implementation of the 2008 Divestiture from Iran and Sudan Act**  
**(Annotated Code of Maryland, State Personnel and Pensions Article, § 21-123.1)**  
**As of April 1, 2024**

The 2008 Divestiture from Iran and Sudan Act (the “Act”) requires the Board of Trustees of the Maryland State Retirement and Pension System (the “Retirement System”) to submit semi-annual reports to the Senate Budget and Taxation and House Appropriations Committees as well as the Joint Committee on Pensions regarding the Retirement System’s implementation of the Act, which is codified at SPP § 21-123.1 of the Annotated Code of Maryland.

The Act requires that the Board of Trustees of the Retirement System (the “Board of Trustees”) review its investments to determine “the extent to which funds in eligible accounts are invested in companies doing business in Iran or Sudan.” An “eligible account” is an actively managed separate account. The Act states that the Board of Trustees shall divest itself of any company doing business in Iran or Sudan, or in any security issued by Iran or Sudan, and may not make any new investments in any company that is doing business in Iran or Sudan; provided, however, that the Act does not require the Board of Trustees to take action unless the Board of Trustees determines, in good faith, that the action is consistent with the fiduciary responsibilities of the Board of Trustees as described in the State pension article.

This is the required semi-annual report for the period commencing October 1, 2023 and ending March 31, 2024 (the “Reporting Period”), and includes the following:

- 1) A summary of correspondence with companies engaged by the Board of Trustees during the Reporting Period;
- 2) All divestment actions taken by the Board of Trustees in accordance with the Act during the Reporting Period;
- 3) A list of companies doing business in Iran or Sudan which the Board of Trustees has determined during the Reporting Period to be ineligible for investments of net new funds under the terms of the Act; and
- 4) Other developments relevant to investment in companies doing business in Iran or Sudan.

**1. A summary of correspondence with companies engaged by the Board of Trustees during the Reporting Period.**

The Retirement System has engaged MSCI ESG Research Inc. (“MSCI ESG”) to periodically provide a list of companies doing business in Iran and/or Sudan (“Focus List”), and to manage the engagement process for the Retirement System. MSCI ESG provided a Focus List dated as of January 1, 2024.

As of the end of the Reporting Period, the Retirement System has not engaged with any companies regarding divestment as no new companies were listed as doing business in Iran or Sudan.

**2. All divestment actions taken by the Board of Trustees during the Reporting Period.**

During the Reporting Period, the Board of Trustees removed the following companies from the list of restricted securities:

- Kontrolmatik Teknoloji Enerji ve Muhendislik AS
- CNOOC CURTIS FUNDING NO.1 PTY LTD

**3. Companies doing business in Iran or Sudan, which the Board of Trustees has determined during the Reporting Period to be ineligible for investments of net new funds under the terms of the Act.**

At its meeting on March 19, 2024, the Board of Trustees determined that the following 31 companies are not eligible for investment and directed that managers of eligible accounts be notified of the restriction.

<u>OPERATING IN SUDAN OR IRAN</u>	<u>COMPANY NAME</u>	<u>BUSINESS ACTIVITY as defined in SPP 21- 123.1</u>	<u>COUNTRY</u>
Sudan	Bharat Heavy Electricals Limited	Oil related	India
Iran and Sudan	China National Petroleum Corporation	Oil related	China
Iran and Sudan	China Petrochemical Corporation	Oil related	China
Iran, Sudan	CNPC Global Capital Limited	Oil related	China
Iran and Sudan	CNPC (HK) Overseas Capital Ltd	Oil related	British Virgin Islands
Iran and Sudan	CNPC General Capital Limited	Oil related	British Virgin Islands
Sudan	El Sewedy Electric Company	Oil related	Egypt
Iran	Gaz Capital S.A.	Oil related	Luxembourg
Iran	Gaz Finance PLC	Oil related	United Kingdom
Iran	Gazprom Capital OOO	Oil related	Russia
Iran	Gazprom PAO	Oil related	Russia
Iran	Gazprom Gazoraspredeleniye Server AO	Oil Related	Russia
Sudan	Harbin Power Equipment Company Limited	Oil related	China
Sudan	Managem S.A.	Mineral extraction activities	Morocco

<b><u>OPERATING IN SUDAN OR IRAN</u></b>	<b><u>COMPANY NAME</u></b>	<b><u>BUSINESS ACTIVITY as defined in SPP 21- 123.1</u></b>	<b><u>COUNTRY</u></b>
Sudan	Oil and Natural Gas Corporation Limited	Oil related	India
Sudan	Oil India International PTE. LTD	Oil related	Singapore
Sudan	Oil India Limited	Oil related	India
Sudan	ONGC Videsh Limited	Oil related	India
Sudan	Perseus Mining Limit	Mineral extraction activities	Australia
Sudan	Petroliam Nasional Berhad	Oil related	Malaysia
Sudan	Petronas Capital Limited	Oil related	Malaysia
Sudan	Siemens Aktiengesellschaft	Power production	Germany
Sudan	Siemens Energy	Power production	Germany
Sudan	Siemens Financieringsmaatschappij N.V.	Power production	Netherlands
Iran and Sudan	Sinopec Group Overseas Development (2012) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2013) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2014) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2015) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2016) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2017) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2018) Limited	Oil related	British Virgin Islands

**4. Other developments relevant to investments in companies doing business in Iran or Sudan.**

- A. In discharging their responsibilities under the Act, the Board of Trustees and its Corporate Governance and Securities Litigation Committee (“Corporate Governance Committee”) receive and review information gathered through the engagement process, as well as input from (i) the System’s external investment managers, (ii) Meketa Investment Group, Inc., the System’s general investment consultant, (iii) legal counsel and, (iv) staff of the Investment Division.

The information presented to the Board of Trustees and its Corporate Governance Committee considers a wide array of factors, including:

1. Explicit/initial and implicit/ongoing divestment costs on both an individual and aggregate level;
  2. Company impact on aggregate, fund-level returns and managers; and
  3. Representation of companies in the relevant investment benchmarks, including:
    - i. Representation of companies in sectors and industries; and
    - ii. Representation of companies in various investment benchmarks.
- B. The Board of Trustees recognizes that it has a continuing monitoring and reporting obligation. MSCI ESG is providing ongoing monitoring services, and the general investment consultant, State Retirement Agency staff, and legal counsel will continue to assist the Corporate Governance Committee in reviewing matters regarding the Act.