

SHAWN T. WOODEN
TREASURER

DARRELL V. HILL DEPUTY TREASURER

July 1, 2022

Re: Connecticut Retirement Plans and Trust Funds - Restricted Investments List

## Dear Partners:

Primary among the Treasurer's considerations for the investment of the assets of the Connecticut Retirement Plans and Trust Funds ("CRPTF") is the long-term economic benefit of plan participants and beneficiaries. Toward this end, the Treasurer may divest, decide to not further invest state funds, or not enter into any future investment -- consistent with Connecticut statute, the CRPTF's Investment Policy Statement and common law standards of fiduciary duty. These frameworks provide direction and guidance to the Treasurer when making investment decisions, have been embedded into the investment processes, and are incorporated in all contracts under which CRPTF assets are invested.

Consistent with this discretion, attached please find Connecticut's **Restricted Investments List**, which identifies the companies in which CRPTF assets may <u>not</u> be invested. These include certain companies doing business in Iran and Sudan, Russia-domiciled companies and securities, as well as companies engaged in the manufacture of civilian firearms. The restrictions described in this List are in addition to any restrictions or other sanctions that may be promulgated by the U.S. Office of Foreign Assets Control, other federal entity, or as may be required by contract with the Office of the Treasurer.

We ask that you ensure Connecticut's assets are divested within 90 days of this notice, and not further invested, in any of the companies and/or securities set forth in the attached List. Our investment officers will seek confirmation of this during forthcoming quarterly and annual performance reviews. In addition, our compliance team will request certifications of compliance as part of our annual global risk assessment certification process.

We appreciate your attention to this matter. If you have any questions, please contact Christine Shaw, Principal Investment Officer for Corporate Governance & Sustainable Investment (<a href="mailto:christine.shaw@ct.gov">christine.shaw@ct.gov</a>) or Ginny Kim, Chief Compliance & Diversity Officer (<a href="mailto:ginny.kim@ct.gov">ginny.kim@ct.gov</a>).

Sincerely,

Ted Wright

Chief Investment Officer
Office of the Treasurer

Attachment

## **Connecticut Retirement Plans & Trust Funds' Restricted Investments List**

No CRPTF assets may be invested in any securities issued or guaranteed by the companies on this list, including without limitation the securities specifically listed below.

Effective 7/1/2022

|    | ISSUER_NAME                             | ISSUER_TICKER | ISSUER_ISIN  | Iran | Sudan | Russia | Firearms<br>Manufacturers |
|----|---|---------------|--------------|------|-------|--------|---------------------------|
| 1  | Al-Enmaa Real Estate Company KSCP       | ERESCO        | KW0EQ0400717 |      | х     |        |                           |
| 2  | American Outdoor Brands Inc             | AOUT          | US02875D1090 |      |       |        | Х                         |
| 3  | AMMO, INC.                              | POWW          | US00175J1079 |      |       |        | Х                         |
| 4  | AREVA SA                                | ARVCF         | FR0011027143 | Х    |       |        |                           |
| 5  | BHARAT HEAVY ELECTRICALS LIMITED        | BHEL          | INE257A01026 |      | х     |        |                           |
| 6  | Bilfinger SE                            | GBF           | DE0005909006 | Х    |       |        |                           |
| 7  | China BlueChemical Ltd                  | 3983          | CNE1000002D0 | Х    |       |        |                           |
| 8  | China National Offshore Oil Corporation |               |              | Х    |       |        |                           |
| 9  | China National Petroleum Corporation    | SASAC         | CND100002XJ6 | Х    | Х     |        |                           |
| 10 | China Oilfield Services Limited         | 601808        | CNE100000759 | х    |       |        |                           |
| 11 | CHINA PETROCHEMICAL CORPORATION         | SASAC         | CND100046TP8 | х    | Х     |        |                           |
| 12 | China Petroleum & Chemical Corporation  | 600028        | CNE0000018G1 | х    | Х     |        |                           |
| 13 | China Petroleum Engineering Corporation | 600339        | CNE000001642 | х    | х     |        |                           |
| 14 | CLARUS CORPORATION                      | CLAR          | US18270P1093 |      |       |        | х                         |
| 15 | CNOOC CURTIS FUNDING NO.1 PTY LTD       |               | US12626HAA95 | х    |       |        |                           |
| 16 | CNOOC Finance (2003) Limited            | CNOOC         | US12615TAB44 | х    |       |        |                           |
| 17 | CNOOC Finance (2011) Limited            | CNOOC         | US12621VAB18 | х    |       |        |                           |
| 18 | CNOOC Finance (2012) Limited            | CNOOC         | US12623UAA34 | Х    |       |        |                           |
| 19 | CNOOC Finance (2013) Limited            | CNOOC         | US12625GAC87 | х    |       |        |                           |
| 20 | CNOOC Finance (2014) ULC                |               | US12591DAC56 | х    |       |        |                           |
| 21 | CNOOC FINANCE (2015) AUSTRALIA PTY LTD  |               | US12634GAC78 | Х    |       |        |                           |
| 22 | CNOOC FINANCE (2015) U.S.A. LLC         |               | US12634MAB63 | Х    |       |        |                           |
| 23 | CNOOC LIMITED                           | 883           | HK0883013259 | Х    |       |        |                           |
| 24 | CNPC (HK) Overseas Capital Ltd          |               | US12622NAC65 | x    | х     |        |                           |
| 25 | CNPC Capital Company Limited            | 000617        | CNE000000MS3 | X    | X     |        |                           |
| 26 | CNPC General Capital Limited            |               | US12623TAE82 | X    | X     |        |                           |
| 27 | CNPC Global Capital Limited             |               | XS2179917906 | X    | х     |        |                           |
| 28 | Colt CZ Group SE                        |               | CZ0009008942 |      |       |        | х                         |
| 29 | COLT DEFENSE LLC                        | COESE         |              |      |       |        | X                         |
| 30 | COMPAGNIE FINANCIERE RICHEMONT SA       | CFR           | CH0210483332 |      |       |        | X                         |
| 31 | COSL SINGAPORE CAPITAL LTD.             |               | XS1267602305 | х    |       |        |                           |
| 32 | Daicel Corporation                      | 4202          | JP3485800001 |      |       |        | х                         |
| 33 | Daging Huake Company Limited            | 000985        | CNE000001402 | х    | х     |        |                           |
| 34 | El Sewedy Electric Co SAE               | SWDY          | EGS3G0Z1C014 | ~    | X     |        |                           |
| 35 | Gaz Capital S.A.                        | GAZCA         | US368266AH50 | х    | ,     |        |                           |
| 36 | GAZ FINANCE PLC                         |               | XS2124187571 | X    |       |        |                           |
| 37 | GAZPROM CAPITAL OOO                     |               | RU000A1039A8 | X    |       |        |                           |
| 38 | GAZPROM GAZORASPREDELENIYE SEVER AO     |               | RU000A0JPXX7 | X    |       |        |                           |
| 39 | GAZPROM NEFT' PAO                       | SIBN          | RU0009062467 | x    |       |        |                           |
| 40 | GAZPROM PAO                             | GAZP          | RU0007661625 | X    |       |        |                           |

## **Connecticut Retirement Plans & Trust Funds' Restricted Investments List**

No CRPTF assets may be invested in any securities issued or guaranteed by the companies on this list, including without limitation the securities specifically listed below.

Effective 7/1/2022

|    |   |               |               |      |       |        | Ejjettive 7/1/2022        |
|----|---|---------------|---------------|------|-------|--------|---------------------------|
|    | ISSUER_NAME   | ISSUER_TICKER | ISSUER_ISIN   | Iran | Sudan | Russia | Firearms<br>Manufacturers |
| 41 | Gazprom Promgaz AO                                      |               | RU000A0JRE61  | х    |       |        |                           |
| 42 | GPN Capital S.A.  | STGPN         | US36192NAA90  | Х    |       |        |                           |
| 43 | H&K AG  |               | DE000A11Q133  |      |       |        | Х                         |
| 44 | Harbin Electric Company Limited                         | 1133          | CNE1000003C0  |      | Х     |        |                           |
| 45 | Heckler & Koch GmbH                                     |               |               |      |       |        | Х                         |
| 46 | HINDUSTAN PETROLEUM CORPORATION LIMITED                 | HINDPETRO     | INE094A01015  |      | Х     |        |                           |
| 47 | Howa Machinery, Ltd.                                    | 6203          | JP3840600005  |      |       |        | Х                         |
| 48 | IMITER (STE METALLURGIQUE D') SA                        | SMI           | MA0000010068  |      | х     |        |                           |
| 49 | IMPERATORSKIY TUL'SKIY ORUZHEYNYI ZAVOD PAO             | tozz          | RU0007661203  |      |       |        | Х                         |
| 50 | IZHEVSKIY MASHZAVOD OAO                                 | ROSTE         |               |      |       |        | х                         |
| 51 | KUWAIT FINANCE HOUSE K.S.C.P                            | KFH           | KW0EQ0100085  |      | х     |        |                           |
| 52 | MANAGEM S.A.  | MNG           | MA0000011058  |      | х     |        |                           |
| 53 | MANGALORE REFINERY AND PETROCHEMICALS LIMITED           | MRPL          | INE103A01014  |      | х     |        |                           |
| 54 | Miroku Corporation                                      | 7983          | JP3910800006  |      |       |        | х                         |
| 55 | MISC BERHAD   | MISC          | MYL3816OO005  | Х    | Х     |        |                           |
| 56 | NOF CORPORATION   | 4403          | JP3753400005  |      |       |        | Х                         |
| 57 | OIL AND NATURAL GAS CORPORATION LIMITED                 | ONGC          | INE213A01029  |      | х     |        |                           |
| 58 | OIL INDIA INTERNATIONAL PTE. LTD.                       |               | XS1565437487  |      | х     |        |                           |
| 59 | OIL INDIA LIMITED                                       | OIL           | INE274J01014  |      | Х     |        |                           |
| 60 | Olin Corporation  | OLN           | US6806652052  |      |       |        | Х                         |
| 61 | ONGC VIDESH LIMITED                                     | ONGC          | XS1079848369  |      | Х     |        |                           |
| 62 | Orca Gold Inc   | ORG           | CA68558N1024  |      | Х     |        |                           |
| 63 | PetroChina Company Limited                              | 601857        | CNE1000007Q1  | Х    | Х     |        |                           |
| 64 | PETROLIAM NASIONAL BERHAD (PETRONAS)                    | PTOIM         | US716708AF90  |      | X     |        |                           |
| 65 | PETRONAS Capital Limited                                | PTOIM         | US716743AR02  |      | X     |        |                           |
| 66 | PETRONAS CHEMICALS GROUP BERHAD                         | PCHEM         | MYL5183OO008  | Х    | Х     |        |                           |
| 67 | PETRONAS DAGANGAN BERHAD                                | PETDAG        | MYL5681OO001  | Х    | Х     |        |                           |
| 68 | PETRONAS GAS BERHAD                                     | PETGAS        | MYL6033OO004  | Х    | Х     |        |                           |
| 69 | POONGSAN CORPORATION                                    | 103140        | KR7103140000  |      |       |        | Х                         |
| 70 | Public securities issued by Russian-domiciled companies |               |               |      |       | Х      |                           |
| 71 | Raizen Energia S.A.                                     | RAIZE         | BRRESADBS039  | Х    |       |        |                           |
| 72 | Raizen Fuels Finance S.A.                               |               | US75102XAA46  | X    |       |        |                           |
| 73 | REMINGTON ARMS COMPANY, INC.                            | REMIG         |               | ,    |       |        | х                         |
| 74 | Russian sovereign debt                                  | -             |               |      |       | х      |                           |
| 75 | Securities or instruments issued by government of Iran  |               |               | х    |       | ,      |                           |
| 76 | Securities or instruments issued by government of Sudan |               |               | ,    | х     |        |                           |
| 77 | SIG SAUER INC.  | SIGSR         |               |      | ,     |        | х                         |
| 78 | Sinopec Capital (2013) Limited                          | CPACC         | US82937TAA07  | Х    | х     |        | ~                         |
| 79 | SINOPEC ENGINEERING (GROUP) CO., LTD.                   | 2386          | CNE100001NV2  | X    | X     |        |                           |
| 80 | Sinopec Group Overseas Development (2012) Limited       |               | US82937JAB08  | X    | X     |        |                           |
| 50 | 1   | L .           | 0002707371000 | ^    | ^     |        |                           |

## **Connecticut Retirement Plans & Trust Funds' Restricted Investments List**

No CRPTF assets may be invested in any securities issued or guaranteed by the companies on this list, including without limitation the securities specifically listed below.

Effective 7/1/2022

|     | ISSUER_NAME   | ISSUER_TICKER | ISSUER_ISIN  | Iran | Sudan | Russia | Firearms<br>Manufacturers |
|-----|---|---------------|--------------|------|-------|--------|---------------------------|
| 81  | Sinopec Group Overseas Development (2013) Limited           |               | US82937VAB36 | X    | X     |        | ivianulacturers           |
| 82  | Sinopec Group Overseas Development (2014) Limited           |               | US82937WAE57 | X    | X     |        |                           |
| 83  | Sinopec Group Overseas Development (2015) Limited           |               | USG8201JAC56 | X    | X     |        |                           |
| 84  | Sinopec Group Overseas Development (2016) Limited           |               | USG8200TAD21 | X    | X     |        |                           |
| 85  | Sinopec Group Overseas Development (2017) Limited           |               | USG8201NAG72 | X    | X     |        |                           |
| 86  | Sinopec Group Overseas Development (2018) Limited           |               | US82939GAP37 | X    | X     |        |                           |
| 87  | Sinopec Oilfield Equipment Corporation                      | 000852        | CNE000000XK7 | X    |       |        |                           |
| 88  | Sinopec Oilfield Service Corporation                        | 600871        | CNE0000000K7 |      | X     |        |                           |
| 89  | SMITH & WESSON BRANDS, INC.                                 | SWBI          | US8317541063 | Х    | X     |        |                           |
|     | SNT MOTIV CO.,LTD   | 064960        | KR7064960008 |      |       |        | X                         |
| 90  |   |               |              |      |       |        | Х                         |
| 91  | STURM, RUGER & COMPANY, INC.                                | RGR           | US8641591081 |      |       |        | Х                         |
| 92  | Sudatel Telecom Group Limited                               | SUDATEL       | SD000A0F5KV7 |      | X     |        |                           |
| 93  | TAURUS ARMAS S.A.   | TASA3         | BRTASAACNOR7 |      |       |        | Х                         |
| 94  | The Energy House Holding Company K.S.C.P.                   | ENERGYH       | KW0EQ0601801 |      | Х     |        |                           |
| 95  | TONG CONG TY CO PHAN DICH VU KY THUAT DAU KHI VIET NAM      | PVS           | VN000000PVS0 | X    |       |        |                           |
| 96  | TONG CONG TY CO PHAN KHOAN VA DICH VU KHOAN DAU KHI         | PVD           | VN000000PVD2 | X    |       |        |                           |
| 97  | TONG CONG TY DIEN LUC DAU KHI VIET NAM - CONG TY CO PHAN    |               | VN000000POW7 | Х    |       |        |                           |
| 98  | Tong Cong ty Phan bon va Hoa chat Dau khi - Cong ty Co phan | DPM           | VN00000DPM1  | Х    |       |        |                           |
| 99  | Verney Carron SA  | MLVER         | FR0006174496 |      |       |        | х                         |
| 100 | VISTA OUTDOOR INC.  | VSTO          | US9283771007 |      |       |        | Х                         |
|     | TOTAL   |               |              | 55   | 44    | 2      | 24                        |