



**State of Connecticut**  
**Office of the Treasurer**

July 1, 2024

**Re: Connecticut Retirement Plans and Trust Funds – 2024 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 **2024 Restricted Investments List**, which identifies the companies in which CRPTF assets may not be invested. The restrictions described in this List are in addition to any restrictions or sanctions 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.

**Iran and Sudan Investment Restrictions:** Pursuant to Section 3-13g (Iran) and 3-21e (Sudan) of the Connecticut General Statutes, the Office of the Treasurer prohibits direct investment in the companies identified under the "Iran" and "Sudan" columns, respectively.

**Russia Investment Restrictions:** Pursuant to the Treasurer's fiduciary responsibilities and discretionary investment authority under Connecticut law, since March 1, 2022, the CRPTF has prohibited new CRPTF holdings in Russian-domiciled companies as well as Russian sovereign debt.

**Gun Policy Investment Restrictions:** Pursuant to the Treasurer's fiduciary responsibilities and discretionary investment authority under Connecticut law, since December 3, 2019, the CRPTF has prohibited new CRPTF holdings in certain companies engaged in the manufacture of civilian firearms.

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 Jessica Weaver, Deputy Director - Corporate Governance and Sustainable Investments ([jessica.d.weaver@ct.gov](mailto:jessica.d.weaver@ct.gov)) or Ginny Kim, Chief Compliance Officer ([ginny.kim@ct.gov](mailto:ginny.kim@ct.gov)).

Sincerely,

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Ted Wright  
Chief Investment Officer, Office of the Treasurer

## 2024 Restricted Investments List

Effective July 1, 2024

### 2024 Restricted Investments List - *Effective 7/1/2024*

#### Connecticut Retirement Plans & Trust Funds (CRPTF)

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.

	ISSUER_NAME	ISSUER_TICKER	ISSUER_ISIN	Iran	Sudan	Russia	Firearms Manufacturers
1	<del>Al-Enmaa Real Estate Company KSCP</del> <i>(REMOVED EFF 7/1/24)</i>	<del>ERESCO</del>	<del>KW0EQ0400717</del>		<del>REMOVED</del>		
2	American Outdoor Brands Inc	AOUT	US02875D1090				X
3	AMMO, INC.	POWW	US00175J1079				X
4	<del>BHARAT HEAVY ELECTRICALS LIMITED</del> <i>(REMOVED eff 7/1/24)</i>	<del>BHEL</del>	<del>INE257A01026</del>		<del>REMOVED</del>		
5	Bilfinger SE	GBF	DE0005909006	X			
6	China BlueChemical Ltd	3983	CNE1000002D0	X			
7	China National Offshore Oil Corporation			X			
8	China National Petroleum Corporation	SASAC	CND100002XJ6	X	X		
9	China Oilfield Services Limited	601808	CNE100000759	X			
10	CHINA PETROCHEMICAL CORPORATION	SASAC	CND100046TP8	X	X		
11	China Petroleum & Chemical Corporation	600028	CNE0000018G1	X	X		
12	China Petroleum Engineering Corporation	600339	CNE000001642	X	X		
13	CLARUS CORPORATION	CLAR	US18270P1093				X
14	CNOOC CURTIS FUNDING NO.1 PTY LTD		US12626HAA95	X			
15	CNOOC Energy Technology & Services Limited	600968	CNE100003L78	X			
16	CNOOC Finance (2003) Limited	CNOOC	US12615TAB44	X			
17	CNOOC Finance (2011) Limited	CNOOC	US12621VAB18	X			
18	CNOOC Finance (2012) Limited	CNOOC	US12623UAA34	X			
19	CNOOC Finance (2013) Limited	CNOOC	US12625GAC87	X			
20	CNOOC Finance (2014) ULC		US12591DAC56	X			
21	CNOOC FINANCE (2015) AUSTRALIA PTY LTD		US12634GAC78	X			
22	CNOOC FINANCE (2015) U.S.A. LLC		US12634MAB63	X			
23	CNOOC LIMITED	883	HK0883013259	X			
24	CNPC (HK) Overseas Capital Ltd		US12622NAC65	X	X		
25	CNPC Capital Company Limited	000617	CNE000000MS3	X	X		
26	CNPC General Capital Limited		US12623TAE82	X	X		
27	CNPC Global Capital Limited		XS2179917906	X	X		
28	Colt CZ Group SE		CZ0009008942				X
29	COLT DEFENSE LLC	COESE					X
30	COMPAGNIE FINANCIERE RICHEMONT SA	CFR	CH0210483332				X
31	COSL SINGAPORE CAPITAL LTD.		XS1267602305	X			
32	Daicel Corporation	4202	JP3485800001				X
33	Daqing Huake Company Limited	000985	CNE000001402	X	X		
34	El Sewedy Electric Co SAE	SWDY	EGS3G0Z1C014		X		
35	Gaz Capital S.A.	GAZCA	US368266AH50	X			
36	GAZ FINANCE PLC		XS2124187571	X			
37	GAZPROM CAPITAL OOO		RU000A1039A8	X			
38	GAZPROM GAZORASPREDELENIYE SEVER AO		RU000A0JPXX7	X			

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39	GAZPROM NEFT' PAO	SIBN	RU0009062467	x			
40	GAZPROM PAO	GAZP	RU0007661625	x			
41	Gazprom Promgaz AO		RU000A0JRE61	x			
42	GPN Capital S.A.	STGPN	US36192NAA90	x			
43	H&K AG		DE000A11Q133				x
44	Harbin Electric Company Limited	1133	CNE1000003C0		x		
45	Heckler & Koch GmbH						x
46	HINDUSTAN PETROLEUM CORPORATION LIMITED	HINDPETRO	INE094A01015		x		
47	Howa Machinery, Ltd.	6203	JP3840600005				x
48	IMITER (STE METALLURGIQUE D') SA	SMI	MA0000010068		x		
49	IMPERATORSKIY TUL'SKIY ORUZHEYNYI ZAVOD PAO	tozz	RU0007661203				x
50	IZHEVSKIY MASHZAVOD OAO	ROSTE					x
51	MANAGEM S.A.	MNG	MA0000011058		x		
52	MANGALORE REFINERY AND PETROCHEMICALS LIMITED	MRPL	INE103A01014		x		
53	Miroku Corporation	7983	JP3910800006				x
54	MISC BERHAD	MISC	MYL381600005	x	x		
55	NOF CORPORATION	4403	JP3753400005				x
56	OIL AND NATURAL GAS CORPORATION LIMITED	ONGC	INE213A01029		x		
57	OIL INDIA INTERNATIONAL PTE. LTD.		XS1565437487		x		
58	OIL INDIA LIMITED	OIL	INE274J01014		x		
59	Olin Corporation	OLN	US6806652052				x
60	ONGC VIDESH LIMITED	ONGC	XS1079848369		x		
61	PetroChina Company Limited	601857	CNE1000007Q1	x	x		
62	PETROLIAM NASIONAL BERHAD (PETRONAS)	PTOIM	US716708AF90		x		
63	PETRONAS Capital Limited	PTOIM	US716743AR02		x		
64	PETRONAS CHEMICALS GROUP BERHAD	PCHEM	MYL518300008	x	x		
65	PETRONAS DAGANGAN BERHAD	PETDAG	MYL568100001	x	x		
66	PETRONAS GAS BERHAD	PETGAS	MYL603300004	x	x		
67	POONGSAN CORPORATION	103140	KR7103140000				x
68	Public securities issued by Russian-domiciled companies					x	
69	<del>Raizen Energia S.A. (REMOVED EFF 7/1/24)</del>	<del>RAIZE</del>	<del>BRRESADBS039</del>	<del>REMOVED</del>			
70	<del>Raizen Fuels Finance S.A. (REMOVED EFF 7/1/24)</del>		<del>US75102XAA46</del>	<del>REMOVED</del>			
71	REMINGTON ARMS COMPANY, INC.	REMIG					x
72	Russian sovereign debt					x	
73	Securities or instruments issued by government of Iran			x			
74	Securities or instruments issued by government of Sudan				x		
75	SIG SAUER INC.	SIGSR					x
76	Sinopec Capital (2013) Limited	CPACC	US82937TAA07	x	x		

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77	SINOPEC ENGINEERING (GROUP) CO., LTD.	2386	CNE100001NV2	x	x		
78	Sinopec Group Overseas Development (2012) Limited		US82937JAB08	x	x		
79	Sinopec Group Overseas Development (2013) Limited		US82937VAB36	x	x		
80	Sinopec Group Overseas Development (2014) Limited		US82937WAE57	x	x		
81	Sinopec Group Overseas Development (2015) Limited		USG8201JAC56	x	x		
82	Sinopec Group Overseas Development (2016) Limited		USG8200TAD21	x	x		
83	Sinopec Group Overseas Development (2017) Limited		USG8201NAG72	x	x		
84	Sinopec Group Overseas Development (2018) Limited		US82939GAP37	x	x		
85	Sinopec Oilfield Equipment Corporation	000852	CNE000000XK7	x	x		
86	Sinopec Oilfield Service Corporation	600871	CNE000000HS3	x	x		
87	SMITH & WESSON BRANDS, INC.	SWBI	US8317541063				x
88	SNT MOTIV CO.,LTD	064960	KR7064960008				x
89	STURM, RUGER & COMPANY, INC.	RGR	US8641591081				x
90	Sudatel Telecom Group Limited	SUDATEL	SD000A0F5KV7		x		
91	TAURUS ARMAS S.A.	TASA3	BRTASAACNOR7				x
92	TONG CONG TY CO PHAN DICH VU KY THUAT DAU KHI VIET NAM	PVS	VN000000PVS0	x			
93	TONG CONG TY CO PHAN KHOAN VA DICH VU KHOAN DAU KHI	PVD	VN000000PVD2	x			
94	TONG CONG TY DIEN LUC DAU KHI VIET NAM - CONG TY CO PHAN		VN000000POW7	x			
95	Tong Cong ty Phan bon va Hoa chat Dau khi - Cong ty Co phan	DPM	VN000000DPM1	x			
96	Verney Carron SA	MLVER	FR0006174496				x
97	VISTA OUTDOOR INC.	VSTO	US9283771007				x
	<b>TOTAL</b>			<b>53</b>	<b>39</b>	<b>2</b>	<b>24</b>