



Roby Smith  
Treasurer of State

Capitol Building  
1007 E Grand Avenue  
Des Moines, IA 50319

September 30, 2025

Honorable W. Charles Smithson,  
Secretary of the Senate  
Honorable Meghan Nelson,  
Chief Clerk of the House  
General Assembly of the State of Iowa  
State Capitol Building  
Des Moines, IA 50319

Dear Mr. Smithson and Ms. Nelson:

I respectfully submit to you the annual reports from the Treasurer of State regarding fiscal year 2025 investment activity related to Iowa Code 12H – Restrictions on Iran-Related Investments. Attached are reports for the State Operating Fund, the Iowa Judicial Retirement System, and the Iowa Peace Officers' Retirement, Accident and Disability System.

Respectfully Yours,

A handwritten signature in cursive script that reads "Roby Smith".

Roby Smith  
Treasurer of State

Enclosures

**Iowa Judicial Retirement System  
Annual Report  
On Iran Divestment  
For The Fiscal Year Ended June 30, 2025**

**Purpose**

This is the fourteenth annual report required by Iowa Code Chapter 12H regarding restrictions on Iran-related investments by the Iowa Judicial Retirement System (JRS). In response to the support that Iran has provided for acts of international terrorism, the General Assembly passed HF484, which places restrictions on investments in certain companies that have active business operations in Iran. Effective beginning March 1, 2012, this law intends for state funds not to be invested in companies that provide power production-related services, mineral extraction activities, oil-related activities, or military equipment to the government of Iran.

Chapter 12H applies to JRS in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies, which have active or inactive business operations in Iran. JRS uses the research services of ISS ESG to assist in developing the list of scrutinized companies to comply with this requirement.

JRS is prohibited from directly investing in scrutinized companies with active business operations listed on the most current quarterly list. The fund was required to divest from any company with active business operations that were directly held by the fund as of March 1, 2012, after sending written notification to the company.

Any company owned indirectly through a fund is not subject to divestment, but still requires that JRS send written notification. Further, JRS is required to send written correspondence to the investment managers of funds with scrutinized company holdings urging the managers to divest of the scrutinized companies or start a separate fund free of Iran-related holdings.

**Scrutinized Companies List**

JRS' FY 2025 quarterly scrutinized company list is attached. As of June 30, 2025, JRS did not hold, either directly or indirectly, any companies on the list of scrutinized companies.

**Written Notices**

During the fiscal year, no companies on the scrutinized company list were held either directly or indirectly by JRS.

**Divestment**

As JRS did not have any direct or indirect holdings of scrutinized companies, no divestment was required.

**Report Availability**

This report, along with any other quarterly scrutinized company list can be obtained by contacting the Treasurer's office at 515-281-5644 or [karen.kulisky@tos.iowa.gov](mailto:karen.kulisky@tos.iowa.gov).

**Iowa Peace Officers' Retirement, Accident and Disability System  
Annual Report  
On Iran Divestment  
For The Fiscal Year Ended June 30, 2025**

**Purpose**

This is the fourteenth annual report required by Iowa Code Chapter 12H regarding restrictions on Iran-related investments by the Iowa Peace Officers' Retirement, Accident and Disability System (PORS). In response to the support that Iran has provided for acts of international terrorism, the General Assembly passed HF484, which places restrictions on investments in certain companies that have active business operations in Iran. Effective beginning March 1, 2012, this law intends for state funds not to be invested in companies that provide power production-related services, mineral extraction activities, oil-related activities, or military equipment to the government of Iran.

Chapter 12H applies to PORS in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies, which have active or inactive business operations in Iran. PORS uses the research services of ISS ESG to assist in developing the list of scrutinized companies to comply with this requirement.

PORS is prohibited from directly investing in scrutinized companies with active business operations listed on the most current quarterly list. The fund was required to divest from any company with active business operations that were directly held by the fund as of March 1, 2012, after sending written notification to the company.

Any company owned indirectly through a fund is not subject to divestment, but still requires that PORS send written notification. Further, PORS is required to send written correspondence to the investment managers of funds with scrutinized company holdings urging the managers to divest of the scrutinized companies or start a separate fund free of Iran-related holdings.

**Scrutinized Companies List**

PORS' FY 2025 quarterly scrutinized company list is attached. As of June 30, 2025, PORS did not hold, either directly or indirectly, any companies on the list of scrutinized companies.

**Written Notices**

During the fiscal year, no companies on the scrutinized company list were held either directly or indirectly by PORS.

**Divestment**

As PORS did not have any direct or indirect holdings of scrutinized companies, no divestment was required.

**Report Availability**

This report, along with any other quarterly scrutinized company list can be obtained by contacting the Treasurer's office at 515-281-5644 or [karen.kulisky@tos.iowa.gov](mailto:karen.kulisky@tos.iowa.gov).

**Iowa State Operating Fund  
Annual Report  
On Iran Divestment  
For The Fiscal Year Ended June 30, 2025**

**Purpose**

This is the fourteenth annual report required by Iowa Code Chapter 12H regarding restrictions on Iran-related investments by the Iowa State Operating Fund (SOF). In response to the support that Iran has provided for acts of international terrorism, the General Assembly passed HF484, which places restrictions on investments in certain companies that have active business operations in Iran. Effective beginning March 1, 2012, this law intends for state funds not to be invested in companies that provide power production-related services, mineral extraction activities, oil-related activities, or military equipment to the government of Iran.

Chapter 12H applies to SOF in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies, which have active or inactive business operations in Iran. SOF uses the research services of ISS ESG to assist in developing the list of scrutinized companies to comply with this requirement.

SOF is prohibited from directly investing in scrutinized companies with active business operations listed on the most current quarterly list. The fund was required to divest from any company with active business operations that were directly held by the fund as of March 1, 2012, after sending written notification to the company.

Any company owned indirectly through a fund is not subject to divestment, but still requires that SOF send written notification. Further, SOF is required to send written correspondence to the investment managers of funds with scrutinized company holdings urging the managers to divest of the scrutinized companies or start a separate fund free of Iran-related holdings.

**Scrutinized Companies List**

SOF's FY 2025 quarterly scrutinized company list is attached. As of June 30, 2025, SOF held the securitization of asset backed loans from both PILOT 2024-2A2A and PILOT 251 A2A. Neither PILOT 2024-2A2A or PILOT 251 A2A are specifically enumerated on the scrutinized company list, and ISS ESG did not render an opinion specific to either investment.

**Written Notices**

During the fiscal year, the SOF held the securitization of asset backed loans from both PILOT 2024-2A2A and PILOT 251 A2A. Specifically, the SOF held the securitization of loans made to owners of Porsche vehicles, where the asset backing the loan was the Porsche vehicle being purchased. Out of an abundance of caution, SOF sent a letter to Porsche, a scrutinized company, urging them to cease all business operations in the country of Iran. A letter was also sent to the investment manager to inform them that investment must be divested no sooner than ninety days, but no later than eighteen months, following the first written notice sent to the scrutinized company.

**Divestment**

Out of an abundance of caution, the investment manager has 18 months to divest of from both PILOT 2024-2A2A and PILOT 251 A2A, and will move forward with liquidation following the 90-day waiting period specified in §12H.4(2).

**Report Availability**

This report, along with any other quarterly scrutinized company list can be obtained by contacting the Treasurer's office at 515-281-5644 or [karen.kulisky@tos.iowa.gov](mailto:karen.kulisky@tos.iowa.gov).

## Iran Company List FY25

China Nonferrous Metal Industry's Foreign Eng. & Constr.  
China Petroleum & Chemical Corporation  
Gas To Liquid PJSC  
Gazprom PJSC  
KANGWON ENERGY Co., Ltd.  
Motor Sich JSC  
Norinco International Cooperation Ltd.  
PetroChina Company Limited  
Porsche Automobil Holding SE  
POSCO Holdings, Inc.  
POSCO INTERNATIONAL Corp.  
SINOPEC Engineering (Group) Co., Ltd.  
Transneft PJSC  
Volkswagen AG