



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 12J – Restrictions Regarding Companies Boycotting Israel. 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 Restrictions Regarding Companies Boycotting Israel
For The Fiscal Year Ended June 30, 2025**

Purpose

This is the ninth annual report required by Iowa Code Chapter 12J regarding restrictions on companies that boycott Israel that are held by the Iowa Judicial Retirement System (JRS). In response to the concern of boycotts and related tactics that threaten sovereignty and security of allies and trade partners of the United States, the General Assembly passed HF2331, which places restrictions on investments in certain companies that restrict trade with Israel. Effective beginning March 1, 2017, this law intends for state funds not to be invested in companies that refuse to engage in commerce with Israel and boycott Israel or persons doing business with Israel or territories controlled by Israel. HF2373 was signed on March 23, 2022, and the definition of company was expanded to also include subsidiaries, a parent company, or affiliates.

Chapter 12J applies to JRS in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies. 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, 2017, 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 scrutinized holdings.

Scrutinized Companies List

JRS' FY 2025 quarterly scrutinized company list is attached. As of June 30, 2025, JRS does 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.

**Iowa Peace Officers' Retirement, Accident and Disability System
Annual Report
On Restrictions Regarding Companies Boycotting Israel
For The Fiscal Year Ended June 30, 2025**

Purpose

This is the ninth annual report required by Iowa Code Chapter 12J regarding restrictions on companies that boycott Israel that are held by the Iowa Peace Officers' Retirement, Accident and Disability System (PORS). In response to the concern of boycotts and related tactics that threaten sovereignty and security of allies and trade partners of the United States, the General Assembly passed HF2331, which places restrictions on investments in certain companies that restrict trade with Israel. Effective beginning March 1, 2017, this law intends for state funds not to be invested in companies that refuse to engage in commerce with Israel and boycott Israel or persons doing business with Israel or territories controlled by Israel. HF2373 was signed on March 23, 2022, and the definition of company was expanded to also include subsidiaries, a parent company, or affiliates.

Chapter 12J applies to PORS in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies. 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, 2017, 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 scrutinized holdings.

Scrutinized Companies List

PORS' FY 2025 quarterly scrutinized company list is attached. As of June 30, 2025, PORS does 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.

**Iowa State Operating Fund
Annual Report
On Restrictions Regarding Companies Boycotting Israel
For The Fiscal Year Ended June 30, 2025**

Purpose

This is the ninth annual report required by Iowa Code Chapter 12J regarding restrictions on companies that boycott Israel that are held by the Iowa State Operating Fund (SOF). In response to the concern of boycotts and related tactics that threaten sovereignty and security of allies and trade partners of the United States, the General Assembly passed HF2331, which places restrictions on investments in certain companies that restrict trade with Israel. Effective beginning March 1, 2017, this law intends for state funds not to be invested in companies that refuse to engage in commerce with Israel and boycott Israel or persons doing business with Israel or territories controlled by Israel. HF2373 was signed on March 23, 2022, and the definition of company was expanded to also include subsidiaries, a parent company, or affiliates.

Chapter 12J applies to SOF in the following ways:

The system must identify and make available to the public a quarterly updated list of scrutinized companies. 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, 2017, 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 scrutinized holdings.

Scrutinized Companies List

SOF's FY 2025 quarterly scrutinized company list is attached. As of June 30, 2025, SOF directly held commercial paper for Unilever Finance Netherlands B.V. Unilever Finance Netherlands B.V. is not specifically enumerated on the scrutinized company list, but serves as one of the main financing companies of Unilever Plc.

Written Notices

During the fiscal year, commercial paper for Unilever Finance Netherlands B.V. was held by SOF. While the holding was not related to Ben & Jerry's or The Magnum Ice Cream Company¹, per the requirements of the law, SOF sent a letter to the scrutinized company (Unilever Plc), urging them to stop refusing to engage in commerce with Israel and stop boycotting Israel or persons doing business with Israel. A letter

¹ Unilever is in the process of spinning off Ben & Jerry's, and its ice cream business generally, into a new company called The Magnum Ice Cream Company, which expects to begin independently publicly trading in November 2025.

was also sent to the investment manager to inform them that investment must be divested no later than eighteen months, following the first written notice sent to the scrutinized company.

Divestment

The investment manager has 18 months to divest of Unilever Finance Netherlands B.V. The security will mature and roll off on November 18, 2025, which is before the end of the 90-day waiting period specified in Iowa Code §12J.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.

Israel Company List FY25

ASN Bank NV

Co-operative Group Ltd.

DNB Bank ASA

Kommunal Landspensjonskasse Gjensidig Forsikringselskap

Storebrand ASA

Unilever Plc