Annual Report of Iowa's Iran Scrutinized List Pursuant to HF 484

August 31, 2026

Introduction

On April 20, 2011, Governor Terry Branstad signed House File 484,[1] an act concerning investment of certain public funds by the treasurer of state, public retirement systems in Iowa, and the state board of regents in companies doing business in Iran. HF 484 requires Iowa's Treasurer, Public Retirement Systems, and the Board of Regents to compile a list of "scrutinized companies." The scrutinized company list is comprised of companies identified as having prohibited business operations in Iran as defined by HF 484. In addition, the legislation prohibits Iowa's Public Retirement Systems from acquiring securities of companies identified as having prohibited business operations in Iran and requires the divestment of securities of scrutinized companies.

Included in this report is:

- The definition of scrutinized companies per Iowa HF 484.
- A description of the methodology utilized in the generation of the scrutinized company list.
- The most recent scrutinized company list (Second Quarter, 2026), ***Tables 1, 2, and 3.***
- A detailed log showing the changes to the list over the past year, ***Tables 4, 5, 6, and 7.***

Definition of Scrutinized Companies Pursuant to Iowa HF 484

"Scrutinized company" means any company that is not a social development company that meets any of the following criteria:

a. The company has business operations that involve contracts with or provision of supplies or services to the government of Iran, companies in which the government of Iran has any direct or indirect equity share, Iranian government-commissioned consortiums or projects, or companies involved in Iranian government-commissioned consortiums or projects; and meets any of the additional following criteria:

(1) More than ten percent of the company's revenues or assets linked to Iran involve oil-related activities or mineral extraction activities and the company has failed to take substantial action.

(2) More than ten percent of the company's revenues or assets linked to Iran involve power production activities and the company has failed to take substantial action.

[1] http://coolice.legis.state.ia.us/Cool-ICE/default.asp?Category=billinfo&Service=Billbook&menu=false&ga=84&hbill=HF484

b. The Company supplies military equipment to Iran unless it clearly shows that the military equipment cannot be used to facilitate international acts of terrorism.

Methodology Used to Generate the Scrutinized Companies List

ISS ESG, in conjunction with Iowa's Public Retirement Systems, developed a methodology for creating an Iran scrutinized company list. To determine whether a company meets the criteria for inclusion on the scrutinized list, ISS ESG applies the criteria from HF 484 to perform a review of companies with potential ties to Iran. In the review process, ISS ESG utilizes a variety of public sources, including:

- SEC Filings
- U.S. Government Agency Information (OFAC, EDGAR, EIA, etc.)
- News Wires and Trade Publications
- Industry Analysis
- Company Disclosures
- Non-Governmental Organization Reports
- Any Other Publicly Available Information

Using this methodology, ISS ESG has produced a scrutinized companies list based on information from July 1, 2025 – June 30, 2026.

Table 1: List of Scrutinized Companies Determined as Having Active Business Operations in Iran

Active business operations, as defined in HF 484, are "all business operations that are not inactive business operations." Included in the table are the company name, identifiers, and the reason for its inclusion on the scrutinized list. The information presented is current as of 06/30/2026.

Company Name	ISIN	SYMBOL	CUSIP	Reason for Inclusion on List[2]
China Nonferrous Metal Industry's Foreign Eng. & Constr.	CNE000000PK3	000758	Y1499Z101	Government; Mining
Gas To Liquid PJSC	RU000A0JTN19	GTLC	X3248S108	Government; Energy-related Activity
Gazprom PJSC	RU0007661625	GAZP	X3123F106	Government; Energy-related Activity
HMS Hydraulic Machines & Systems Group Plc	US40425X4079	HMSG	40425X407	Government; Mining; Power Production

[2] Under the "Reason for Inclusion on List" column the following definitions apply:

Government: The company has business operations that involve contracts with or provision of supplies or services to the government of Iran, companies in which the government of Iran has any direct or indirect equity share, Iranian government-commissioned consortiums or projects, or companies involved in Iranian government commissioned consortiums or projects

Energy-related Activity: The company has significant involvement (>10 percent of in-country revenues) in oil or natural gas related activities in Iran

Power Production: The company has significant involvement (>10 percent of in-country revenues) in power (electricity) production activities in Iran

Mining: The company has significant involvement (>10 percent of in-country revenues) in mineral extraction activities in Iran

Potential Military Equipment: The company supplies military equipment to Iran (or products that could be used by the Iranian military) unless the company clearly shows that the military equipment cannot be used to facilitate international acts of terrorism

KANGWON ENERGY Co., Ltd.	KR7114190002	114190	Y4526G104	Government; Power Production
Motor Sich JSC	UA4000143135	MSICH	X55849115	Government; Power Production
Norinco International Cooperation Ltd.	CNE000000VZ9	000065	Y7742L104	Government; Power Production
Porsche Automobil Holding SE	DE000PAH0038	PAH3	D6240C122	Government; Power Production
POSCO Holdings, Inc.	KR7005490008	005490	Y70750115	Government; Mining
POSCO INTERNATIONAL Corp.	KR7047050000	047050	Y1911C102	Government; Mining
Transneft PJSC	RU0009091573	TRNFP	X9191K109	Government; Energy-related Activity
Volkswagen AG	DE0007664039	VOW3	D94523103	Government; Power Production

Table 2: List of Scrutinized Companies Determined as Having Inactive Business Operations in Iran

Inactive business operations, as defined in HF 484, is "the mere continued holding or renewal of rights to property previously operated for the purpose of generating revenues but not presently deployed for such purpose." Included in the table are the company name, identifiers, and the reason for its inclusion on the scrutinized list. The information presented is current as of 06/30/2026.

Currently there are no identified companies with inactive business operations in Iran.

Table 3: List of Companies That Have Implemented a Plan of Substantial Action[3]

List of companies that meet the requirements set forth in Iowa HF 484 for inclusion on the scrutinized company list but have in the past submitted a plan of substantial action. The information presented is current as of 06/30/2026.

Company Name	ISIN	SYMBOL	CUSIP	Reason for Inclusion[1]
Metso Corp.	FI0009014575	METSO	X5404W104	Government; Mining

[3] HF484 defines a plan of substantial action as: "adopting, publicizing and implementing a formal plan to cease scrutinized business operations within one year and to refrain from any such new business operations."

Table 4: List of Changes to the Scrutinized List from Second Quarter 2025 to Third Quarter 2025

Company Name	ISIN	SYMBOL	ACTION	Reason for Change

Table 5: List of Changes to the Scrutinized List from Third Quarter 2025 to Fourth Quarter 2025

Company Name	ISIN	SYMBOL	ACTION	Reason for Change
HMS Hydraulic Machines & Systems Group Plc	US40425X4079	HMSG	Add	New involvement identified

Table 6: List of Changes to the Scrutinized List from Fourth Quarter 2025 to First Quarter 2026

Company Name	ISIN	SYMBOL	ACTION	Reason for Change

Table 7: List of Changes to the Scrutinized List from First Quarter 2026 to Second Quarter 2026

Company Name	ISIN	SYMBOL	ACTION	Reason for Change
China Petroleum & Chemical Corporation	CNE1000002Q2	386	Delete	No longer involved
PetroChina Company Limited	CNE1000003W8	857	Delete	No longer involved
SINOPEC Engineering (Group) Co., Ltd.	CNE100001NV2	2386	Delete	No longer involved