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universities and special schools*

University of Iowa
Iowa State University
University of Northern Iowa
Iowa School for the Deaf
Iowa Braille and Sight Saving School
Lakeside Lab Regents Resource Center
Quad-Cities Graduate Center
Southwest Iowa Regents Resource Center
Tri-State Graduate Center



**BOARD OF
REGENTS**
STATE OF IOWA

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Robert Donley, *Executive Director*

September 27, 2012

Michael E. Marshall
Secretary of the Senate
State Capitol Building
Des Moines IA 50319

Charles Smithson
Chief Clerk of the House
State Capitol Building
Des Moines IA 50319

Re: Annual Report – Sudan Divestment

Dear Members of the Iowa General Assembly:

Enclosed is the Board of Regents' report for the fiscal year ended June 30, 2012, on divestment activities related to companies doing business in Sudan and Iran. This annual report is required by Iowa Code §12F.5.

Sincerely,


Robert Donley

H:\BF\Investments\Sudan Divestment\Annualreport2012.doc
cc: Robin Madison, LSA
Legislative Log

Board of Regents, State of Iowa

A. Total Universe of Companies Per Conflict Resolution Network

(formerly Sudan Divestment Task Force)

B. Summary of all written notices sent

C. Total Positions Divested

As of: June 30, 2012

A. Total Universe of SUDAN Scrutinized Companies

As of May 31,2012

COMPANY	CATEGORY
Alstom	Highest Offender
Alstom Projects India	Highest Offender
Alstom Power Transformers	Highest Offender
Wuhan Boiler Company	Highest Offender
AREF Energy Holding Company	Highest Offender
Higleig Petroleum Services and Investment Co. Ltd	Highest Offender
AviChina Industry & Technology	Highest Offender
Hafei Aviation Industry Co	Highest Offender
Harbin Dongan Auto Engine Co.	Highest Offender
Caterpillar Inc.	Highest Offender
Caterpillar Credito	Highest Offender
Caterpillar Finance Corp	Highest Offender
Caterpillar Financial Australia Ltd	Highest Offender
Caterpillar Financial Services Corp	Highest Offender
Caterpillar International Finance Ltd	Highest Offender
Caterpillar Used Equipment Services International SARL	Highest Offender
F.G. Wilson Engineering Ltd	Highest Offender
Perkins Engineers Co. Ltd	Highest Offender
China Gezhoubu Group Company	Highest Offender
China Hydraulic & Hydroelectric Construction Group (Sinohydro)	Highest Offender
Sinohydro Group Ltd	Highest Offender
China North Industries Group Corp (CNGC/NORINCO)	Highest Offender
AKM Industrial Co. Ltd.	Highest Offender
China North Industries Corporation (NORINCO)	Highest Offender
Liaoning Huajin Tongda Chemicals	Highest Offender
North Navigation Control Technology Co. Ltd	Highest Offender
NORINCO International Cooperation Ltd	Highest Offender
Sichuan Nitrocell Co. Ltd	Highest Offender
China National Petroleum Corp (CNPC)	Highest Offender
China Petroleum Finance Co Ltd	Highest Offender
CNPC Golden Autumn Ltd	Highest Offender
CNPC HK Overseas Capital Ltd	Highest Offender
CNPC General Capital Limited	Highest Offender
Daqing Huake Group Co. Ltd	Highest Offender
Jinan Diesel Engine Co. Ltd	Highest Offender
Kunlun Energy Co. Ltd	Highest Offender
PetroChina Co. Ltd	Highest Offender
China Petrochemical Corp (Sinopec Group)	Highest Offender
China International United Petroleum and Chemicals	Highest Offender
China Petroleum & Chemical Corp	Highest Offender
Kingdream PLC	Highest Offender
Sinopec Finance Co Ltd	Highest Offender
Sinopec Group Overseas Development Ltd	Highest Offender
Sinopec International Petroleum Services Corp	Highest Offender
Sinopec Kantons Holdings Ltd	Highest Offender
Sinopec Shanghai Petrochemicals Ltd	Highest Offender
Sinopec Yizheng Chemical Fibre Co. Ltd	Highest Offender
ZPEB Corporation	Highest Offender
Dongfeng Motor Group Co. Ltd	Highest Offender
Egypty Kuwait Holding Company	Highest Offender
Tri Ocean Energy	Highest Offender
Electricity Generating Company (EGCO)	Highest Offender
EGCO Engineering and Service Company Ltd	Highest Offender
Glencore International PLC	Highest Offender
Biopetrol Industries AG	Highest Offender
Chemoil Energy Ltd	Highest Offender
Glencore FDG LLC	Highest Offender
Glencore Finance	Highest Offender

A. Total Universe of SUDAN Scrutinized Companies

As of May 31, 2012

COMPANY	CATEGORY
Glencore Finance (Europe)	Highest Offender
Indian Oil Corporation Ltd (IOCL)	Highest Offender
Chennai Petroleum Corporation Ltd	Highest Offender
Lanka IOC Ltd	Highest Offender
Jiangxi Hongdu Aviation Industry Co. Ltd	Highest Offender
JX Holdings Inc	Highest Offender
JX Nippon Oil & Energy Corporation	Highest Offender
Nippo Corporation	Highest Offender
Nippon Oil Corporation	Highest Offender
Nippon Oil Finance	Highest Offender
Nippon Mining Holdings	Highest Offender
KEPCO Plant Service & Engineering Co., Ltd	Highest Offender
LS Industrial Systems Managem	Highest Offender
ONA S.A.	Highest Offender
Societe Metallurgique	Highest Offender
Mercator Ltd	Highest Offender
Mercator Lines Singapore	Highest Offender
Oil & Natural Gas Corporation Ltd. ONGC)	Highest Offender
Mangalore Refinery & Petrochemicals Ltd	Highest Offender
ONGC Nile Ganga BV Amsterdam	Highest Offender
ONGC Videsh Limited	Highest Offender
Oil India Ltd	Highest Offender
Petroliam Nasional Berhad (Petronas)	Highest Offender
Gas District Cooling PutraJaya Sdn Bhd	Highest Offender
KLCC Property Holdings Bhd	Highest Offender
Malaysia International Shipping Co. (MISC Bhd)	Highest Offender
Midciti Resources Sdn Bhd	Highest Offender
MISC Capital Ltd	Highest Offender
OGP Technical Services	Highest Offender
Optimal Chemicals (Malaysia) Sdn Bhd	Highest Offender
Petronas Capital Ltd	Highest Offender
Petronas Carigali Nile	Highest Offender
Petronas Chemical Group Berhad	Highest Offender
Petronas Chemicals Glycols Sdn Bhd	Highest Offender
Petronas Dagangan Bhd	Highest Offender
Petronas Gas Bhd	Highest Offender
Petronas Marketing Sudan	Highest Offender
Putrajaya Holdings Sdn Bhd	Highest Offender
PT Pertamina Persero	Highest Offender
PTT Public Company Ltd	Highest Offender
Ptt Exploration & Production PCL	Highest Offender
PTTEP Australia International Finance Proprietary Ltd	Highest Offender
PTTEP Canada International Finance Ltd	Highest Offender
Ranhill Berhad	Highest Offender
Ranhill Power Sdn Bhd	Highest Offender
Ranhill Powertron Sdn	Highest Offender
Reliance Industries Ltd	Highest Offender
Infotel Broadband Services Ltd	Highest Offender
Reliance Holdings USA Inc.	Highest Offender
Scomi Group Berhad	Highest Offender
Scomi Oiltools	Highest Offender
KMCOB Capital Berhad	Highest Offender
Scomi Engineering Berhad	Highest Offender
Trafigura Beheer	Highest Offender

B. Summary of all written notices

Each Quarter Board of Regents notified Regent institutions of Sudan Divestment Task Force document valid for the quarter ended that lists scrutinized companies. Institutions asked to identify any of these companies within their investment holdings. Institutions responded.

The following chart summarizes the number of companies contacted in fiscal year 2012 pursuant of chapter 12F

Time Period	Number
September 30, 2011	5
December 31, 2011	1
March 31, 2012	2
June 30, 2012	0

October 1, 2012 File annual report
Post notice on Regents website that Sudan Divestment annual report has been filed and is available upon request.

List of Board of Regents "Scrutinized Companies"
As of May 31, 2012

Company	Letters Mailed	Category	Direct Holding	Indirect Holding
Electricity Generating Company (EGC)	1st Qtr	Highest Offender		X
Glencore International PLC	1st Qtr	Highest Offender		X
Indian Oil Company Ltd	1st Qtr	Highest Offender		X
Reliance Industries Ltd	1st Qtr	Highest Offender		X
Sinopec Yizheng Chemical Fibre Com	1st Qtr	Highest Offender		X
AviChina Industry & Technology Ltd	2nd Qtr	Highest Offender		X
Caterpillar Inc	3rd Qtr	Highest Offender		X
Caterpillar Financial Services Corp	3rd Qtr	Highest Offender		X

Board of Regents, State of Iowa

IRAN Divestment

A. Total Universe of Companies Per Conflict Resolution Network

B. Summary of all written notices sent

C. Total Positions Divested

As of: June 30, 2012

A. Total Universe of IRANScrutinized Companies


As of June 30, 2012

COMPANY	CATEGORY
Aban Offshore Ltd.	Highest Offender
Alstom	Highest Offender
Arabian Pipes Co	Highest Offender
Bharat Petroleum Corporation Ltd.	Highest Offender
BP plc	Highest Offender
Chadormalu Mineral & Ind. Co.	Highest Offender
China Nonferrous Metal Industry's Foreign Eng. And Const. Co. Ltd.	Highest Offender
China Oilfield Services	Highest Offender
China Petroleum & Chemical Corp	Highest Offender
Daelim Industrial	Highest Offender
Daewoo Shipbuilding & Marine Engineering	Highest Offender
* Danieli & C - Officine Meccaniche Spa	Highest Offender
Dietswell Engineering	Highest Offender
Dominion Energy Plc	Highest Offender
Doosan Co., Ltd	Highest Offender
Doosan Heavy Industries and Construction	Highest Offender
Edison Spa	Highest Offender
* Engineers India Ltd.	Highest Offender
Exmar SA	Highest Offender
* Finmeccanica Spa	Highest Offender
Gail (India) Ltd.	Highest Offender
Gas Natural SDG	Highest Offender
Gazprom	Highest Offender
Gazprombank OAO	Highest Offender
GS Engineering & Construction Corp	Highest Offender
GS Holdings	Highest Offender
Honeywell International, Inc.	Highest Offender
Ilyushin Aviation Complex	Highest Offender
Ina-Industrija Nafta DD	Highest Offender
Indian Oil Corporation Ltd.	Highest Offender
Itochu Corporation	Highest Offender
Johnson Matthey plc	Highest Offender
JSC Gazprom Neft	Highest Offender
KEC International Ltd.	Highest Offender
Liquefied Natural Gas Ltd	Highest Offender
Maire Tecnimont S.p.A.	Highest Offender
MAN SE	Highest Offender
Mitsui & Co. Ltd	Highest Offender
MMC Corp Bhd	Highest Offender
MOL Magyar Olaj-es Gazipari Nyrt	Highest Offender
Motor Sich	Highest Offender
Nagarjuna Fertilizers & Chemicals Ltd.	Highest Offender
Oil & Natural Gas Corporation Ltd.	Highest Offender
Oil India Ltd	Highest Offender
OMV AG	Highest Offender
Outotec Oyj	Highest Offender
PetroChina Co. Ltd.	Highest Offender
Petrofac	Highest Offender
Petroleo Brasileiro S.A.	Highest Offender
Petronet LNG Ltd.	Highest Offender
Posco	Highest Offender
Power Machines	Highest Offender
Poyry Plc	Highest Offender
PTT Chemical Public Co Ltd (formerly PTT Global Chemical Public Co. Ltd)	Highest Offender
PTT Public Company Limited	Highest Offender
Saipem Spa	Highest Offender
Shipping Corporation of India Ltd.	Highest Offender

A. Total Universe of IRANScrutinized Companies

As of June 30, 2012

COMPANY	CATEGORY
SK Networks Co. Ltd.	Highest Offender
SNC - Lavalin Group Inc.	Highest Offender
Technip	Highest Offender
Toyo Engineering Corporation	Highest Offender
Tupolev Oao	Highest Offender
UCL Resources Limited (formerly Union Resources Ltd)	Highest Offender
United Aircraft Corporation	Highest Offender
Weir Group plc	Highest Offender
Zio Podolsk Machinery Plant	Highest Offender
DROPPED:	
Aker ASA	
Aker Solutions ASA	
Areva	
Camillo Eitzen & Co Asa	
Clontarf Energy plc	
Dolphin Offshore Enterprises (India) Ltd.	
Iran Power Plant Projects Managements Co.(MAPNA)	
KBR Inc	
L G International	
Lundin Mining Corp.	
Mitsui Engineering & Shipbuilding Co. Ltd.	
National Aluminium Co. Ltd.	
PSL Ltd.	
PTT Exploration & Production	
Tata Steel Ltd.	
Tecnicas Reunidas	
Turboatom	
ADDED:	
Danieli & C - Officine Meccaniche Spa	
Engineers India Ltd.	
Finmeccanica Spa	

 indicates Parent Company
 Added to Parent Company

B. Summary of all written notices

Each Quarter Board of Regents notified Regent institutions of Iran Divestment Task Force document valid for the quarter ended that lists scrutinized companies. Institutions asked to identify any of these companies within their investment holdings. Institutions responded.

The following chart summarizes the number of companies contacted in fiscal year 2012 pursuant of chapter 12F

Time Period	Number
September 30, 2011	0
December 31, 2011	0
March 31, 2012	81
June 30, 2012	4

October 1, 2012 File annual report
Post notice on Regents website that Iran Divestment annual report has been filed and is available upon request.

List of Board of Regents "Scrutinized Companies"
As of June 30, 2012

Company	Letters Mailed	Category	Direct Holding	Indirect Holding
All Scrutinized Companies	3rd Qtr	Highest Offender		X
Arabian Pipes Company	4th Qtr	Highest Offender		X
Danieli & C - Officine Meccaniche	4th Qtr	Highest Offender		X
Engineers India Ltd.	4th Qtr	Highest Offender		X
Finmeccanica Spa	4th Qtr	Highest Offender		X

Companies deemed "Inactive" by the Iran Divestment Task Force are not subject to divestment. Letters are sent annually.

