Governor Terry E. Branstad
Lt. Governor Kim Reynolds

IPERS
Donna M. Mueller
CHIEF EXECUTIVE OFFICER

September 28, 2015

Honorable Mike Marshall,
Secretary of the Senate
Honorable Carmine Boal,
Chief Clerk of the House
General Assembly of the State of Iowa
Des Moines, IA 50319

Dear Mr. Marshall and Ms. Boal:

Enclosed is the Iowa Public Employees' Retirement System's report for the fiscal year ended June 30, 2015, on divestment activities related to companies doing business in Iran. This annual report is required by Iowa Code section 12H.5.

The report describes IPERS' implementation of the Iran divestment program and provides information on IPERS divestment activities and costs. The report also includes the list of prohibited companies that was in effect as of June 30, 2015.

Sincerely,

Donna M. Mueller
Chief Executive Officer

Enclosure

IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM
7401 Register Drive P.O. Box 9117
Des Moines, IA 50306-9117

TELEPHONE 515-281-0020
BENEFITS FAX 515-281-0053
OPERATIONS FAX 515-281-0055
WEB SITE www.ipers.org
TOLL-FREE 1-800-622-3849
LEGAL & INVESTMENTS MANAGEMENT FAX 515-281-0045
E-MAIL info@ipers.org

IOWA PUBLIC EMPLOYEES' RETIREMENT SYSTEM
ANNUAL REPORT
ON IRAN DIVESTMENT
For the Fiscal Year Ended June 30, 2015

Iowa Code chapter 12H requires the Iowa Public Employees' Retirement System (IPERS) to scrutinize companies with business operations in Iran, and under certain circumstances, to restrict its purchases of, and/or divest of, holdings of any company determined to have active business operations in Iran. Chapter 12H specifies certain procedures to be followed in engaging companies doing business in Iran, and requires IPERS to annually report to the General Assembly on its activities concerning the Iran divestment law.

Implementation

IPERS develops its list of scrutinized companies using the research and findings of IW Financial (IWF). IPERS and several of the public entities covered under Chapter 12H contracted with IWF to provide these services. IWF is a research firm that specializes in researching and monitoring the activities of companies against various types of environmental, social and governance screens. IWF uses the criteria established in Chapter 12H to screen various sources of publicly available information in order to provide IPERS with a list of scrutinized companies. IWF also assists IPERS in evaluating any follow-up responses from scrutinized companies.

IPERS sends a letter to each company believed to have active business operations in Iran and asks them to discontinue their operations in Iran. Companies are given the opportunity to provide evidence that contradicts IWF's findings. The letter also notifies the company that IPERS will prohibit further investment and/or divest of its holdings in the company's securities if the company does not meet the requirements of the law. If the company does not respond, or fails to provide convincing evidence within the time period established by law, then IPERS places the company on its prohibited companies list. The prohibited companies list is updated quarterly, and is provided to the public on IPERS' Web site at www.ipers.org.

IPERS' investment managers are prohibited from purchasing securities issued by companies on the prohibited companies list. Investment managers that have any existing direct holdings[1] of a prohibited company must sell (divest) the position within

[1] It is important to note that chapter 12H makes a distinction between direct holdings and indirect holdings. *Direct holdings* are securities directly owned and held in IPERS' name. *Indirect holdings* refer to situations where IPERS may indirectly own an interest in a security because of its ownership of shares in a commingled investment vehicle, such as a mutual fund. The General Assembly recognized that it may not be possible to efficiently divest of prohibited companies held in a commingled fund, and exempted indirect holdings from many provisions of chapter 12H. IPERS is required to analyze the prudence of moving its indirect holdings to Iran-free commingled funds if such an option exists. See section on Indirect Holdings.

18 months of the date the company was first notified. An investment manager has the discretion to decide when to sell its holdings within the 18 month period.

Chapter 12H requires IPERS to engage only those scrutinized companies in which it has direct holdings. However, IPERS has opted to send letters to all scrutinized companies, and will place a scrutinized company on the prohibited companies list if warranted, regardless of whether or not IPERS has any direct holdings in the company. This is done because IPERS prefers to engage a company and determine whether it is a prohibited company pursuant to the law's criteria before an investment manager purchases any securities of such company. IPERS' investment managers want to know if a company is prohibited before buying it - not afterwards.

Chapter 12H also requires IPERS to contact companies that have inactive business operations in Iran. However, the purpose of such letter is to encourage them to keep their business activities inactive until state-sponsored terrorism stops in Iran. IPERS uses information from IWF to determine which companies may have inactive business operations in the Iran. Currently, no companies have inactive business operations in Iran as defined in Chapter 12H.

Fiscal Year 2015 Engagement Activity

The following chart summarizes the numbers of companies contacted by IPERS in fiscal year 2015 pursuant to chapter 12H.

Time Period	Number
Sept. 30, 2014	3
Dec. 31, 2014	1
Mar. 31, 2015	2
June 30, 2015	1

Letters were sent to seven companies under scrutiny for active business operations. IPERS received responses from none of these companies. During fiscal year 2015, only six companies were added to the prohibited companies list, and eleven companies were removed. The companies were removed because IPERS, with the assistance of IWF, concluded that they no longer met the criteria established in Chapter 12H. IPERS' prohibited companies list in effect as of June 30, 2015 is included as Appendix A to this report.

Chapter 12H also requires IPERS to send reminder letters to companies on the prohibited companies list and encourage them to transform their operations to inactive operations. This task was completed in September 2015 for the twenty-nine companies on IPERS' prohibited companies list on July 16, 2015.

Fiscal Year 2015 Divestment Activity

At the close of fiscal year 2015 on June 30, 2015, IPERS had no direct holdings in any prohibited security. Furthermore, no direct holdings of prohibited securities were purchased in fiscal year 2015 by IPERS' managers.

Indirect Holdings

As noted earlier, chapter 12H makes a distinction between direct and indirect holdings. IPERS held only one indirect holding in the stock of a company listed on the prohibited companies list on June 30, 2015. It was valued at $2,750,433.25. IPERS did not have any indirectly held bonds of companies listed on the prohibited companies list at June 30, 2015. In total, IPERS had $2,750,433.25 worth of indirect holdings as of June 30, 2015, which comprised less than 0.01% of the total IPERS fund.

While indirect holdings are generally exempt from most of the provisions of the law, IPERS is required by law to evaluate the prudence and potential costs associated with moving its indirect investments to funds that will comply with chapter 12H, if any such vehicles exist. IPERS investment staff collected information concerning the potential cost of moving its indirect holdings to Iran-free alternatives in the second quarter of 2012 and presented such information to the IPERS Investment Board at its June 21, 2012 meeting. The Investment Board agreed with staff that it was not prudent to incur the trading costs required to eliminate relatively small indirect exposures to prohibited companies.

Fiscal Year 2015 Program Costs

The cost to implement the Iran monitoring and divestment program have been very low so far. IPERS has not incurred any staff overtime costs during the implementation phase of the program. In fiscal year 2015 IPERS incurred third party costs for research services through IWF of $8,800.00.

For More Information

Updates of IPERS' Iran prohibited list and holdings can be found on IPERS' Web site at https://www.ipers.org/about-us/investments/iran-investment-restrictions quarterly throughout the year. IPERS staff can be reached by e-mail at investments@ipers.org or by telephone at 515-281-0030.

Appendix A

Iowa Public Employees' Retirement System's
Iran Prohibited Companies List

April 16, 2015

	Divestment Date *
» Aban Offshore Ltd.	
» Arabian Pipes Co	
» Bharat Petroleum Corporation Ltd.	
» Chadormalu Mineral & Ind. Co.	
» China Nonferrous Metal Industry`s Foreign Eng. And Const. Co. Ltd.	
» China Oilfield Services	
» China Petroleum & Chemical Corp	
» Crompton Greaves Ltd.	
» Doosan Co., Ltd	
» Dragon Oil Plc	April 25, 2015
» Engineers India Ltd.	
» Gail (India) Ltd.	
» Gazprom OAO	July 16, 2015
» Glencore plc	January 23, 2016
» Indian Oil Corporation Ltd.	
» Maire Tecnimont S.p.A.	July 27, 2015
» Mangalore Refinery & Petrochemicals Ltd.	
» MMC Corp Bhd	July 16, 2015
» Motor Sich	
» National Aluminium Co. Ltd.	January 23, 2016
» Oil & Natural Gas Corporation Ltd.	
» Oil India Ltd	
» Outotec Oyj	
» PetroChina Co. Ltd.	
» Power Construction Corporation of China, Ltd.	April 17, 2016
» Poyry PLC	
» PTT Public Company Limited	
» SK Networks Co. Ltd.	
» Stroytransgaz OAO	January 23, 2016
» Zio Podolsk Machinery Plant	

» Denotes companies with active business operations. There are no companies with inactive business operations. Note: not all of these companies are held by IPERS.

* Denotes deadline for divesting of security.