



SCHOOL EMPLOYEES RETIREMENT SYSTEM OF OHIO

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HELEN M. NINOS
Interim Executive Director

November 21, 2016

Bethany Rhodes, Director/General Counsel
Ohio Retirement Study Council
30 East Broad Street, 2nd Floor
Columbus, OH 43215

Dear Ms. Rhodes: *Bethany*

Enclosed with this letter is the annual update of SERS' compliance with its Iran and Sudan Investment Policy. SERS' policy was adopted by the Retirement Board in September 2007, and each quarter staff provides the Board with a report measuring the system's progress. The enclosed report is for the fiscal year ending June 30, 2016.

SERS' Iran and Sudan Investment Policy honors both the legislature's intent with regard to divestment, and the Board's fiduciary duties to its members. The policy provides a roadmap for staff and external investment managers regarding the engagement process with scrutinized companies on the list.

The engagement process continues to play a prominent role in SERS' divestment activities, as staff engages each company on the updated scrutinized company list each year. Our staff receives monthly updates from our independent third-party screening entity, and is in frequent communication with our external investment managers regarding the updated lists. Each year, SERS' benchmark list is reset, and our new benchmark list for the fiscal year beginning July 1, 2016 is comprised of four scrutinized companies with a total market value of \$15.5 million.

We are encouraged by the success of our divestment efforts, and we plan to continue to engage scrutinized companies to promote this issue. If we can assist you with any additional information or answer any questions, please feel free to contact me.

Sincerely,

Helen M. Ninos
Interim Executive Director

Enclosure

RETIREMENT BOARD

BARBRA M. PHILLIPS
Chair, Employee-Member

MADONNA D. FARAGHER
Vice-Chair, Employee-Member

JAMES H. HALLER
Employee-Member

CHRISTINE D. HOLLAND
Employee-Member

CATHERINE D. MOSS
Retiree-Member

JAMES A. ROSSLER, JR.
Appointed Member

DANIEL L. WILSON
Appointed Member

BEVERLY A. WOOLRIDGE
Retiree-Member

VACANT
Appointed Member

SERS

2016 Annual Report on Iran/Sudan Divestiture

Market value of holdings with companies with scrutinized activities, FY 2007¹-Present (in millions):

FY 2007	FY 2016	Change in market value
\$167.8	\$15.5	-91%

Market value of holdings with companies with scrutinized activities, FY 2015 and 2016 (in millions):

FY 2015	FY 2016	Change in market value
\$11.8	\$15.5	31%

Top five holdings FY 2016 (directly or through active funds):

Company	Market Value (in millions)	% of total scrutinized
Gazprom	\$12.4	80%
Schneider Electric SE	\$1.9	12%
Petronas Chemical Group BHD	\$1.1	7%
Oil India Ltd	\$.08	1%
-	-	-

Comments on remaining top five holdings:

- During FY 2016 correspondence was sent to a total of 51 scrutinized companies. Of the top four held companies one response was received, from Schneider Electric SE. The letter states “We have a strict policy to restrict our business in Sudan to activities that help the country improve its electrical distribution infrastructures...”
- SERS’ Iran and Sudan Investment Policy honors both the legislature’s intent with regard to divestment, and the Board’s fiduciary duties to its members. The policy provides a roadmap for staff and external investment managers regarding the engagement process with scrutinized companies on the list. The engagement process continues to play a prominent role in SERS’ divestment activities, as staff engages each company on the updated scrutinized company list each year. SERS is encouraged by the success of its divestment efforts, and we plan to continue to engage scrutinized companies to promote this issue.

¹ None of the retirement boards had an active Iran/Sudan divestment policy in 2007. 2007 serves as the baseline to measure changes.

Appendix

Summary of correspondences regarding scrutinized companies:

Year of Correspondence	% of Scrutinized Companies Contacted	Summary
2008/2009	100%	Contacted 75 of 75 scrutinized companies; 19 responses
2010	100%	Contacted 68 of 68 scrutinized companies; 24 responses
2011	100%	Contacted 78 of 78 scrutinized companies; 18 responses
2012	100%	Contacted 52 of 52 scrutinized companies; 9 responses
2013	100%	Contacted 54 of 54 scrutinized companies; 14 responses
2014	100%	Contacted 54 of 54 scrutinized companies; 9 responses
2015	100%	Contacted 47 of 47 scrutinized companies; 8 responses
2016	100%	Contacted 48 of 51 scrutinized companies; 7 responses (to date)

Summary of activity with active managers with holdings in scrutinized companies (current reporting year):

- Three letters were returned to sender unopened and no additional contact information was provided. These have been deemed unable to contact: ENI Finance International, Societe Metallurgique d'Imliter, Total Capital Canada Ltd.
- Every month an updated list of scrutinized companies, from ISS, is reviewed by our Investment Compliance Analyst and then distributed to our equity and fixed income managers who have the potential to hold scrutinized companies.
- Managers are required to report, real time, when purchases are made involving a company on the scrutinized list as well as to summarize all Iran/Sudan activity at the end of the month through required compliance reporting.
- Scrutinized holdings are reported to our Board on a quarterly basis with comparison to the prior fiscal year and the 2008 benchmark list along with a Board Memo summarizing managers' Iran/Sudan compliance reporting.

Market value of directly held public securities that are scrutinized companies (as of 09.30.16):

Company	Market value (in millions)
CNOOC LTD	\$9.5
Schneider Electric SE	\$4.4
Petronas Chemicals Group BHD	\$2.1

Summary of sold, redeemed, purchased, withdrawn securities of scrutinized companies (previous three years):

Summary of Activity	FY 2014	FY 2015	FY 2016
	Bharat Heavy Electricals Ltd. (X)	Bharat Heavy Electricals Ltd. (S)	AviChina Industry & Technology (P,S)
	BP Capital Markets plc (X)	China BlueChemical Ltd.(S)	BP Capital Markets plc (S)
	China BlueChemical Ltd. (X)	Petrochina(P)	CNOOC LTD (X)
	Petronas Chemicals Group Berhad (X,S)		Gazprom (S)
	Schneider Electric (X)		Oil India Ltd (P,S)
			Petrochina(S)

S - Sold

R - Redeemed

P - Purchased

W - Withdrawn

X - Previously owned security added to scrutinized list in current report period