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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



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REGENTS**  

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October 1, 2009

Attached is the first annual report from the Board of Regents regarding fiscal year 2009 investment activity related to Iowa Code 12F "Restrictions on Sudan-Related Investments".

***Board of Regents, State of Iowa***

**A. Total Universe of Companies Per Sudan Divestment Task Force**

**B. Summary of all written notices sent**

**C. Total Positions Divested**

**As of:            June 30, 2009**

**A. Total Universe of Companies Per Sudan Divestment Task Force**

<b>COMPANY</b>	<b>CATEGORY</b>
1 Alstom (FRANCE)	Highest Offender
2 AREF Investment Group Co (KUWAIT)	Highest Offender
3 AviChina Industry & Technology Co Ltd (CHINA)	Highest Offender
4 China Hydraulic & Hydroelectric Construction Group aka Sinohydro (CHINA)	Highest Offender
5 China National Petroleum Corp (CHINA)	Highest Offender
6 China North Industries Group Corp aka CNGC/NORINCO (CHINA)	Highest Offender
7 China Petrochemical Corporation aka Sinopec Group (CHINA)	Highest Offender
8 Dietswell Engineering (FRANCE)	Highest Offender
9 Dongfeng Automobile Co, Ltd. (CHINA)	Highest Offender
10 Electricity Generating PCL, aka EGCO (THAILAND)	Highest Offender
11 Egypt Kuwait Holding Co (KUWAIT)	Highest Offender
12 Indian Oil Corp Ltd (INDIA)	Highest Offender
13 Kejuruterann Samudra Timur Bhd, aka KSTB (MALAYSIA)	Highest Offender
14 Kencana Petroleum Bhd (MALAYSIA)	Highest Offender
15 Managem (Morocco)	Highest Offender
16 Mercator Lines (INDIA)	Highest Offender
17 Muhibbah Engineering Berhad (MALAYSIA)	Highest Offender
18 Oil & Natural Gas Corp LTD aka ONGC (INDIA)	Highest Offender
19 PECD Berhad (MALAYSIA)	Highest Offender
20 Petroliam Nasional Berhad (Petronas) (MALAYSIA)	Highest Offender
21 Ranhill Berhad (MALAYSIA)	Highest Offender
22 Scomi Group Berhad (MALAYSIA)	Highest Offender
23 Andritz AG (Austria)	Ongoing Engagement
24 Atlas Copco AB (SWEDEN)	Ongoing Engagement
25 Bharat Electronics Limited (INDIA)	Ongoing Engagement
26 Bharat Heavy Electricals Ltd (INDIA)	Ongoing Engagement
27 China Poly Group Corporation (CHINA)	Ongoing Engagement
28 Essar Oil (India)	Ongoing Engagement
29 GAZ Group (Russia)	Ongoing Engagement
30 GDF Suez (France)	Ongoing Engagement
31 Harbin Power Equipment Limited (China)	Ongoing Engagement
32 KamAZ (RUSSIA)	Ongoing Engagement
33 Man SE (GERMANY)	Ongoing Engagement
34 Mubadala Development Company (UAE)	Ongoing Engagement
35 Nam Fatt Corp Bhd (MALAYSIA)	Ongoing Engagement
26 Nippon Oil Corporation (JAPAN)	Ongoing Engagement
37 Reliance Industries Ltd (INDIA)	Ongoing Engagement
38 Saras S.p.A (ITALY)	Ongoing Engagement
39 Shanghi Electric Group Co. Ltd (CHINA)	Ongoing Engagement
40 Sudatel (Sudan)	Ongoing Engagement
41 Tanjung Offshore Berhad (Malaysia)	Ongoing Engagement
42 Total SA (FRANCE)	Ongoing Engagement
43 Wartsila Oyi (Finland)	Ongoing Engagement
44 La Mancha Resources (Canada)	Substantial Action (sub-category of Ongoing)
45 Mott McDonald (UK)	Substantial Action (sub-category of Ongoing)
46 Petrofac (UK)	Substantial Action (sub-category of Ongoing)
47 Schlumberger (Netherlands Antilles)	Substantial Action (sub-category of Ongoing)

Note: A company that takes "Substantial Action" will not be a target for divestment measures

Companies from Sudan Divestment Task Force dated August 28, 2009

B. Summary of all written notices

- December 1, 2008** Board of Regents notified Regent institutions of Sudan Divestment Task Force document valid for the quarter ended September 30, 2008 listing scrutinized companies and asked them to identify any of these companies within their investment holdings. Institutions responded.
- March 30, 2009** Board of Regents mailed letters to following firm telling them of new legislation enacted pertaining to Sudan. Firm was notified of securities held in portfolio that appeared on the scrutinized companies list determined by the Sudan Divestment Task Force (SDTF).  
**Firms:**  
GMO. LLC
- Board of Regents mailed letters to the following firms notifying them of legislation enacted pertaining to Sudan. These companies are not actively engaged and do not meet the criteria for divestment.  
**Firms:**  
Nippon Oil  
Total SA, France  
Suez SA, France
- March 28, 2009** Board of Regents notified Regent institutions of Sudan Divestment Task Force document valid for the quarter ended December 31, 2008 listing scrutinized companies and asked them to identify any of these companies within their investment holdings. Institutions responded.
- June 15, 2009** Board of Regents mailed letters to following firm telling them of new legislation enacted pertaining to Sudan. Firm was notified  
**Firms:**  
GMO. LLC
- Board of Regents mailed letters to the following firms notifying them of legislation enacted pertaining to Sudan. These companies are not actively engaged and do not meet the criteria for divestment.  
**Firms:**  
Nippon Oil  
Total SA, France  
Suez SA, France
- June 15, 2009** Board of Regents notified Regent institutions of Sudan Divestment Task Force document valid for the quarter ended March 31, 2009 listing scrutinized companies and asked them to identify any of these companies within their investment holdings. Institutions responded.
- Iowa Code Chapter 12F Sec. 3 requires annual notices to Companies with Inactive Operations. As have sent letters twice this year, will not continue to send to these particular companies if remain on "inactive" list.
- September 14, 2009** Board of Regents notified Regent institutions of Sudan Divestment Task Force document valid for the quarter ended June 30, 2009 listing scrutinized companies and asked them to identify any of these companies within their investment holdings. Institutions responded.
- Post notice on Regents website that Sudan Divestment annual report has been filed and is available upon request.

