



## SOUTH DAKOTA INVESTMENT COUNCIL

4009 West 49th Street, Suite 300  
Sioux Falls, SD 57106-3784 USA  
Phone: (605) 362-2820

January 14, 2021

Executive Board  
c/o Reed Holwegner, Director  
Legislative Research Council  
500 E. Capitol Ave.  
Pierre, SD 57501

South Dakota Codified Law 4-5-58 states that by January fifteenth of each calendar year, the State Investment Council shall submit a report to the Executive Board of the Legislative Research Council regarding compliance with SDCL 4-5-48 to 4-5-60, Iran Divestiture. The items to be addressed in the report as outlined in the law are listed below. The actions taken by the Council are in italics.

1. A copy of the most recent list of scrutinized companies;  
§4-5-49 instructs the Council to identify all scrutinized companies in which it has direct holdings from publicly available information. *The Council references the list produced by the State of Florida.*  
§4-5-50 requires the Council to assemble a list of scrutinized companies in which it has direct holdings from the list developed. *This was originally completed at the 8/23/10 Council meeting.*  
§4-5-51 states that the Council shall update the scrutinized companies list each quarter based on continuing information. *The memorandums to the Investment Council dated January 24, 2020, April 1, 2020, May 19, 2020, August 12, 2020 and November 2, 2020 are attached. These memorandums included staff recommendations to update the scrutinized companies list that were approved by the Council. The scrutinized company list will continue to be updated as new information is received.*
2. A summary of correspondence with companies engaged by the State Investment Council pursuant to §4-5-52 (Procedures with respect to companies on the scrutinized companies list);  
*No new companies were added to the scrutinized companies list in which a direct position was held.*
3. A list of all investments sold, redeemed, divested, or withdrawn in compliance with §4-5-53 (Divestiture of securities in companies with scrutinized business operations);  
*No direct holdings were sold, redeemed, divested or withdrawn as a result of the Iran divestiture law.*
4. A list of all prohibited investments pursuant to §4-5-54 (Acquisition of securities in companies with scrutinized business operations prohibited);  
*The internal managers and direct external managers have been provided the updated scrutinized companies list and instructed not to purchase any company on*

*the list. The Investment Council's investment accounting department monitors the various account holdings.*

5. A description of any progress made pursuant to §4-5-57 (Indirect holdings in actively managed investment funds).

*Notifications made and staff will continue to monitor.*

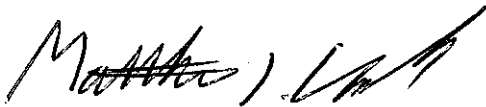
On July 1, 2010 the President of the United States signed H.R.2194: Comprehensive Iran Sanctions, Accountability, and Divestment Act of 2009 which amended the Iran Sanctions Act of 1996. The State of South Dakota is subject to the federal law if it enacted divestiture legislation "before, on or after the date of the enactment of this Act". Both the state and federal law went into effect on July 1, 2010. The Federal requirements must be met to be granted safe harbor from legal action under the "Authority to Divest" provision.

Compliance with the federal law included:

1. Providing written notice of the South Dakota law to the US Attorney General in the Department of Justice.  
*Wade Hubbard, then counsel for SDRS, made the required notification in 2010.*
2. Providing written notice to each company to which the South Dakota law applies.  
*As per §4-5-52 companies have been notified as they have been added to the list. Updated notifications were sent by email on January 16, 2020 to all parent companies on the list.*
3. Divestiture cannot apply to a company earlier than the date that is 90 days after the date of the written notice.  
*The 90 day requirements are concurrent with the 90 day state law requirements in §4-5-52. No companies were sold for divestment purposes during the 90 day period.*
4. Opportunity provided for companies to demonstrate that the measure shall not apply.  
*Companies were given 90 days from notification to demonstrate in writing that the divestment requirements should not apply.*
5. Make every effort to avoid erroneously targeting a company and verify that the company has targeted activities in Iran.  
*§4-5-52 requires that a scrutinized company on the list be given the opportunity to clarify its scrutinized business operations in writing before divestment can occur.*

Any changes to the Federal sanctions law, or its application, will be monitored to determine the effect on the Iran scrutinized companies list.

Sincerely,



Matthew L. Clark  
State Investment Officer

MLC/tvo  
Enclosures  
Cc: South Dakota Investment Council



## SOUTH DAKOTA INVESTMENT COUNCIL

4009 West 49th Street, Suite 300

Sioux Falls, SD 57106-3784 USA

Phone: (605) 362-2820

### MEMORANDUM

TO: South Dakota Investment Council

FROM: Tammy V. Otten, CPA CFA *TVO*  
Assistant Investment Officer Fixed Income/Derivative

Matthew L. Clark, CFA *MLC*  
State Investment Officer

DATE: January 24, 2020

RE: Iran Scrutinized Companies List

The Iran divestment law (SDCL 4-5-48 to 4-5-60) went into effect on July 1, 2010. The Council utilizes a public list provided by Florida to determine the South Dakota list of Iran scrutinized companies.

**The December 3, 2019 updated Florida list added two companies under Sinopec group to their list: China Petrochemical Corporation (Sinopec Group) and Sinopec Century Bright Capital Investment Ltd. The updated Florida list did not remove a company.**

Upon further review of SDCL 4-5-52, Council staff sent written notice information to all the companies on the scrutinized companies list informing the company of its scrutinized status by the South Dakota Investment Council. A sample letter is attached.

SDCL 4-5-57 allows SDRS to invest indirectly in companies on the list through pooled funds. SDRS has about 0.5% of total fund assets invested in a pooled fund managed by Dimensional Fund Advisors (DFA) which at times has held companies on the list. DFA has been informed of the law and their response is on file. SDRS is less than 1% of the DFA pooled fund.

Staff continues to monitor changes to the Federal sanctions law, or its application, to determine the effect on the South Dakota Iran scrutinized companies list.

**STAFF RECOMMENDATION:** *Staff recommends updating the South Dakota Iran scrutinized companies list by adding the two companies listed above during the February 6, 2020 Council conference call.*

tvo

## Iran Scrutinized Companies List

### South Dakota Investment Council - 02/06/2020

(additions denoted by ^)

---

China National Petroleum Corporation (CNPC)  
Bank of Kunlun Co Ltd  
China Petroleum Engineering Corp  
CNPC Capital Company Ltd  
CNPC General Capital Ltd  
CNPC HK Overseas Capital Ltd  
Kunlun Energy Company Ltd  
Kunlun Financial Leasing Co Ltd  
PetroChina

---

China National Offshore Oil Corp Ltd (CNOOC)  
China BlueChemical Ltd  
China Oilfield Services Ltd (COSL)  
CNOOC Curtis Funding No.1 Pty Ltd  
CNOOC Finance Limited  
CNOOC Nexen Finance  
COSL Finance (BVI) Limited  
COSL Singapore Capital Ltd

---

^ China Petrochemical Corporation (Sinopec Group)  
China Petroleum & Chemical Corp (CPCC) Sinopec  
Sinopec Capital 2013 Ltd

^ Sinopec Century Bright Capital Investment Ltd  
Sinopec Engineering Group Co Ltd  
Sinopec Group Overseas Development 2012-2017  
Sinopec Kantons Holdings Ltd  
Sinopec Oilfield Equipment Corp  
Sinopec Oilfield Service Corp  
Sinopec Shanghai Petrochemical

---

Gazprom  
Gazprom Neft  
Gazprom Promgaz  
GPN Capital SA  
Territorial Generating Company No 1  
Indian Oil Corp Ltd (IOCL)  
Mosenergo

---

Oil & Natural Gas Corp (ONGC)  
Hindustan Petroleum Corp Ltd  
Mangalore Refinery & Petrochemicals Ltd  
ONGC Videsh Limited (OVL)

---

Petrolia Nasional (Petronas)  
Engen Botswana  
Gas District Cooling Putrajaya Sdn Bhd  
KLCC Property Holdings Bhd  
Malaysia Marine & Heavy Engineering Holdings Bhd  
MISC Berhad  
Petronas Capital Limited  
Petronas Chemicals Bhd  
Petronas Dagangan Bhd  
Petronas Gas Berhad  
Petronas Global Sukuk  
Putrajaya Management Sdn Bhd

Removed effective 02/06/2020:

none

### Florida State Board of Administration - 12/03/2019

(additions denoted by \*)

---

China National Petroleum Corporation (CNPC)  
Bank of Kunlun Co Ltd  
China Petroleum Engineering Corp  
CNPC Capital Company Ltd  
CNPC General Capital Ltd  
CNPC HK Overseas Capital Ltd  
Kunlun Energy Company Ltd  
Kunlun Financial Leasing Co Ltd  
PetroChina

---

China National Offshore Oil Corp Ltd (CNOOC)  
China BlueChemical Ltd  
China Oilfield Services Ltd (COSL)  
CNOOC Curtis Funding No.1 Pty Ltd  
CNOOC Finance Limited  
CNOOC Nexen Finance  
COSL Finance (BVI) Limited  
COSL Singapore Capital Ltd

---

\* China Petrochemical Corporation (Sinopec Group)  
China Petroleum & Chemical Corp (CPCC) Sinopec  
Sinopec Capital 2013 Ltd

\* Sinopec Century Bright Capital Investment Ltd  
Sinopec Engineering Group Co Ltd  
Sinopec Group Overseas Development 2012-2017  
Sinopec Kantons Holdings Ltd  
Sinopec Oilfield Equipment Corp  
Sinopec Oilfield Service Corp  
Sinopec Shanghai Petrochemical

---

Gazprom  
Gazprom Neft  
Gazprom Promgaz  
GPN Capital SA  
Territorial Generating Company No 1  
Indian Oil Corp Ltd (IOCL)  
Mosenergo

---

Oil & Natural Gas Corp (ONGC)  
Hindustan Petroleum Corp Ltd  
Mangalore Refinery & Petrochemicals Ltd  
ONGC Videsh Limited (OVL)

---

Petrolia Nasional (Petronas)  
Engen Botswana  
Gas District Cooling Putrajaya Sdn Bhd  
KLCC Property Holdings Bhd  
Malaysia Marine & Heavy Engineering Holdings Bhd  
MISC Berhad  
Petronas Capital Limited  
Petronas Chemicals Bhd  
Petronas Dagangan Bhd  
Petronas Gas Berhad  
Petronas Global Sukuk  
Putrajaya Management Sdn Bhd

Removed effective 12/03/2019:

none



## **SOUTH DAKOTA INVESTMENT COUNCIL**

**4009 West 49th Street, Suite 300  
Sioux Falls, SD 57106-3784 USA  
Phone: (605) 362-2820**

January 16, 2020

China National Petroleum Corporation  
9 Dongzhimen North Street  
Dongcheng District  
Beijing, P.R. China 100007

admin@petrochinacorporation.com

Dear Sir:

The South Dakota Investment Council is required by South Dakota law to communicate with your company concerning your operations in Iran. The Investment Council is responsible for the investment of retirement funds, trust funds and cash accounts of the State of South Dakota.

According to publicly available information, your company has been identified as a "scrutinized company" with business operations in Iran. As a result, South Dakota law requires the South Dakota Investment Council to send this notice informing that China National Petroleum Corporation and its subsidiaries are subject to divestment.

We request that you clarify your scrutinized business activities in Iran. If you are unable to clarify that your business activities do not constitute "scrutinized business activities in Iran," we encourage you to cease or convert any such activities to inactive status. If you publicly announce your commitment to take "substantial action specific to Iran" within 90 days of receipt of this letter, your company will be removed from the list of companies subject to divestment.

Please note that investment restrictions of South Dakota law do not apply if your company affirms it is primarily engaged in, 1) supplying goods or services to relieve human suffering; 2) promoting health, education, or journalistic, religious, or welfare activities; or 3) a US company that is authorized by the federal government to have active business operations in Iran.

Please respond in writing within 90 days of receipt of this communication. If you have any questions, please contact Tammy V. Otten at 605-362-2825 or Tammy.Otten@state.sd.us.

Sincerely,

Matthew L. Clark  
State Investment Officer



## SOUTH DAKOTA INVESTMENT COUNCIL

4009 West 49th Street, Suite 300

Sioux Falls, SD 57106-3784 USA

Phone: (605) 362-2820

### MEMORANDUM

TO: South Dakota Investment Council

FROM: Tammy V. Otten, CPA CFA *TVO*  
Assistant Investment Officer Fixed Income/Derivative

Matthew L. Clark, CFA *MLC*  
State Investment Officer

DATE: April 1, 2020

RE: Iran Scrutinized Companies List

The Iran divestment law (SDCL 4-5-48 to 4-5-60) went into effect on July 1, 2010. The Council utilizes a public list provided by Florida to determine the South Dakota list of Iran scrutinized companies.

**Florida has not updated their Iran scrutinized companies lists since December 3, 2019. The Council included the changes noted in the last Florida report during the February 6, 2020 Council conference call meeting.**

Per SDCL 4-5-52, Council staff sent written notices in January of 2020 to all the companies on the scrutinized companies list informing the company of its scrutinized status by the South Dakota Investment Council. **There was only one response received to the written notices.**

SDCL 4-5-57 allows SDRS to invest indirectly in companies on the list through pooled funds. SDRS has about 0.5% of total fund assets invested in a pooled fund managed by Dimensional Fund Advisors (DFA) which at times has held companies on the list. DFA has been informed of the law and their response is on file. SDRS is less than 1% of the DFA pooled fund.

Staff continues to monitor changes to the Federal sanctions law, or its application, to determine the effect on the South Dakota Iran scrutinized companies list.

**STAFF RECOMMENDATION:** *Staff recommends no change to the South Dakota Iran scrutinized companies list during the April 16, 2020 Council conference call.*

tvo



## SOUTH DAKOTA INVESTMENT COUNCIL

4009 West 49th Street, Suite 300

Sioux Falls, SD 57106-3784 USA

Phone: (605) 362-2820

### MEMORANDUM

TO: South Dakota Investment Council

FROM: Tammy V. Otten, CPA CFA *TVO*  
Assistant Investment Officer Fixed Income/Derivative

Matthew L. Clark, CFA *MLC*  
State Investment Officer

DATE: May 19, 2020

RE: Iran Scrutinized Companies List

The Iran divestment law (SDCL 4-5-48 to 4-5-60) went into effect on July 1, 2010. The Council utilizes a public list provided by Florida to determine the South Dakota list of Iran scrutinized companies.

**Florida has not updated their Iran scrutinized companies list since December 3, 2019. The Council included the changes noted in the last Florida report during the February 6, 2020 Council conference call meeting.**

SDCL 4-5-57 allows SDRS to invest indirectly in companies on the list through pooled funds. SDRS has about 0.5% of total fund assets invested in a pooled fund managed by Dimensional Fund Advisors (DFA) which at times has held companies on the list. DFA has been informed of the law and their response is on file. SDRS is less than 1% of the DFA pooled fund.

Staff continues to monitor changes to the Federal sanctions law, or its application, to determine the effect on the South Dakota Iran scrutinized companies list.

**STAFF RECOMMENDATION:** *Staff recommends no change to the South Dakota Iran scrutinized companies list during the June 4, 2020 Council conference call.*

tvo



## SOUTH DAKOTA INVESTMENT COUNCIL

4009 West 49th Street, Suite 300  
Sioux Falls, SD 57106-3784 USA  
Phone: (605) 362-2820

### MEMORANDUM

TO: South Dakota Investment Council

FROM: Tammy V. Otten, CPA CFA *TVO*  
Assistant Investment Officer Fixed Income/Derivative

Matthew L. Clark, CFA *MLC*  
State Investment Officer

DATE: August 12, 2020

RE: Iran Scrutinized Companies List

The Iran divestment law (SDCL 4-5-48 to 4-5-60) went into effect on July 1, 2010. The Council utilizes a public list provided by Florida to determine the South Dakota list of Iran scrutinized companies.

**Florida updated their Iran scrutinized companies list on May 28, 2020. There were no changes to the names on the list.**

SDCL 4-5-57 allows SDRS to invest indirectly in companies on the list through pooled funds. SDRS has about 0.5% of total fund assets invested in a pooled fund managed by Dimensional Fund Advisors (DFA) which at times has held companies on the list. DFA has been informed of the law and their response is on file. SDRS is less than 1% of the DFA pooled fund.

Staff continues to monitor changes to the Federal sanctions law, or its application, to determine the effect on the South Dakota Iran scrutinized companies list.

**STAFF RECOMMENDATION:** *Staff recommends no change to the South Dakota Iran scrutinized companies list (attached) during the August 27, 2020 Council conference call.*

tvo  
attached



## Iran Scrutinized Companies List

### South Dakota Investment Council - 08/27/2020

(additions denoted by ^)

China National Petroleum Corporation (CNPC)  
 Bank of Kunlun Co Ltd  
 China Petroleum Engineering Corp  
 CNPC Capital Company Ltd  
 CNPC General Capital Ltd  
 CNPC HK Overseas Capital Ltd  
 Kunlun Energy Company Ltd  
 Kunlun Financial Leasing Co Ltd  
 PetroChina

---

China National Offshore Oil Corp Ltd (CNOOC)  
 China BlueChemical Ltd  
 China Oilfield Services Ltd (COSL)  
 CNOOC Curtis Funding No.1 Pty Ltd  
 CNOOC Finance Limited  
 CNOOC Nexen Finance  
 COSL Finance (BVI) Limited  
 COSL Singapore Capital Ltd

---

China Petrochemical Corporation (Sinopec Group)  
 China Petroleum & Chemical Corp (CPCC) Sinopec  
 Sinopec Capital 2013 Ltd  
 Sinopec Century Bright Capital Investment Ltd  
 Sinopec Engineering Group Co Ltd  
 Sinopec Group Overseas Development 2012-2017  
 Sinopec Kantons Holdings Ltd  
 Sinopec Oilfield Equipment Corp  
 Sinopec Oilfield Service Corp  
 Sinopec Shanghai Petrochemical

---

Gazprom  
 Gazprom Neft  
 Gazprom Promgaz  
 GPN Capital SA  
 Territorial Generating Company No 1  
 Indian Oil Corp Ltd (IOCL)  
 Mosenergo

---

Oil & Natural Gas Corp (ONGC)  
 Hindustan Petroleum Corp Ltd  
 Mangalore Refinery & Petrochemicals Ltd  
 ONGC Videsh Limited (OVL)

---

Petrolia Nasional (Petronas)  
 Engen Botswana  
 Gas District Cooling Putrajaya Sdn Bhd  
 KLCC Property Holdings Bhd  
 Malaysia Marine & Heavy Engineering Holdings Bhd  
 MISC Berhad  
 Petronas Capital Limited  
 Petronas Chemicals Bhd  
 Petronas Dagangan Bhd  
 Petronas Gas Berhad  
 Petronas Global Sukuk  
 Putrajaya Management Sdn Bhd

Removed effective 08/27/2020:

none

### Florida State Board of Administration - 05/28/2020

(additions denoted by \*)

China National Petroleum Corporation (CNPC)  
 Bank of Kunlun Co Ltd  
 China Petroleum Engineering Corp  
 CNPC Capital Company Ltd  
 CNPC General Capital Ltd  
 CNPC HK Overseas Capital Ltd  
 Kunlun Energy Company Ltd  
 Kunlun Financial Leasing Co Ltd  
 PetroChina

---

China National Offshore Oil Corp Ltd (CNOOC)  
 China BlueChemical Ltd  
 China Oilfield Services Ltd (COSL)  
 CNOOC Curtis Funding No.1 Pty Ltd  
 CNOOC Finance Limited  
 CNOOC Nexen Finance  
 COSL Finance (BVI) Limited  
 COSL Singapore Capital Ltd

---

China Petrochemical Corporation (Sinopec Group)  
 China Petroleum & Chemical Corp (CPCC) Sinopec  
 Sinopec Capital 2013 Ltd  
 Sinopec Century Bright Capital Investment Ltd  
 Sinopec Engineering Group Co Ltd  
 Sinopec Group Overseas Development 2012-2017  
 Sinopec Kantons Holdings Ltd  
 Sinopec Oilfield Equipment Corp  
 Sinopec Oilfield Service Corp  
 Sinopec Shanghai Petrochemical

---

Gazprom  
 Gazprom Neft  
 Gazprom Promgaz  
 GPN Capital SA  
 Territorial Generating Company No 1  
 Indian Oil Corp Ltd (IOCL)  
 Mosenergo

---

Oil & Natural Gas Corp (ONGC)  
 Hindustan Petroleum Corp Ltd  
 Mangalore Refinery & Petrochemicals Ltd  
 ONGC Videsh Limited (OVL)

---

Petrolia Nasional (Petronas)  
 Engen Botswana  
 Gas District Cooling Putrajaya Sdn Bhd  
 KLCC Property Holdings Bhd  
 Malaysia Marine & Heavy Engineering Holdings Bhd  
 MISC Berhad  
 Petronas Capital Limited  
 Petronas Chemicals Bhd  
 Petronas Dagangan Bhd  
 Petronas Gas Berhad  
 Petronas Global Sukuk  
 Putrajaya Management Sdn Bhd

Removed effective 05/28/2020:

none




## SOUTH DAKOTA INVESTMENT COUNCIL

4009 West 49th Street, Suite 300  
Sioux Falls, SD 57106-3784 USA  
Phone: (605) 362-2820

### MEMORANDUM

TO: South Dakota Investment Council

FROM: Tammy V. Otten, CPA CFA   
Assistant Investment Officer Fixed Income/Derivative

Matthew L. Clark, CFA  
State Investment Officer

DATE: November 2, 2020

RE: Iran Scrutinized Companies List

The Iran divestment law (SDCL 4-5-48 to 4-5-60) went into effect on July 1, 2010. The Council utilizes a public list provided by Florida to determine the South Dakota list of Iran scrutinized companies.

**Florida updated their Iran scrutinized companies list on September 22, 2020. There were no additions or deletions to the names on the list.**

SDCL 4-5-57 allows SDRS to invest indirectly in companies on the list through pooled funds. SDRS has about 0.5% of total fund assets invested in a pooled fund managed by Dimensional Fund Advisors (DFA) which at times has held companies on the list. DFA has been informed of the law and their response is on file. SDRS is less than 1% of the DFA pooled fund.

Staff continues to monitor changes to the Federal sanctions law, or its application, to determine the effect on the South Dakota Iran scrutinized companies list.

**STAFF RECOMMENDATION:** *Staff recommends no change to the South Dakota Iran scrutinized companies list (attached) during the November 19, 2020 Council conference call.*

tvo  
attached

## Iran Scrutinized Companies List

### South Dakota Investment Council - 11/19/2020

(additions denoted by ^)

China National Petroleum Corporation (CNPC)  
Bank of Kunlun Co Ltd  
China Petroleum Engineering Corp  
CNPC Capital Company Ltd  
CNPC General Capital Ltd  
CNPC HK Overseas Capital Ltd  
Kunlun Energy Company Ltd  
Kunlun Financial Leasing Co Ltd  
PetroChina

---

China National Offshore Oil Corp Ltd (CNOOC)  
China BlueChemical Ltd  
China Oilfield Services Ltd (COSL)  
CNOOC Curtis Funding No.1 Pty Ltd  
CNOOC Finance Limited  
CNOOC Nexen Finance  
COSL Finance (BVI) Limited  
COSL Singapore Capital Ltd

---

China Petrochemical Corporation (Sinopec Group)  
China Petroleum & Chemical Corp (CPCC) Sinopec  
Sinopec Capital 2013 Ltd  
Sinopec Century Bright Capital Investment Ltd  
Sinopec Engineering Group Co Ltd  
Sinopec Group Overseas Development 2012-2017  
Sinopec Kantons Holdings Ltd  
Sinopec Oilfield Equipment Corp  
Sinopec Oilfield Service Corp  
Sinopec Shanghai Petrochemical

---

Gazprom  
Gazprom Neft  
Gazprom Promgaz  
GPN Capital SA  
Territorial Generating Company No 1  
Indian Oil Corp Ltd (IOCL)  
Mosenergo

---

Oil & Natural Gas Corp (ONGC)  
Hindustan Petroleum Corp Ltd  
Mangalore Refinery & Petrochemicals Ltd  
ONGC Videsh Limited (OVL)

---

Petrolia Nasional (Petronas)  
Engen Botswana  
Gas District Cooling Putrajaya Sdn Bhd  
KLCC Property Holdings Bhd  
Malaysia Marine & Heavy Engineering Holdings Bhd  
MISC Berhad  
Petronas Capital Limited  
Petronas Chemicals Bhd  
Petronas Dagangan Bhd  
Petronas Gas Berhad  
Petronas Global Sukuk  
Putrajaya Management Sdn Bhd

### Removed effective 11/19/2020:

none

### Florida State Board of Administration - 09/22/2020

(additions denoted by \*)

China National Petroleum Corporation (CNPC)  
Bank of Kunlun Co Ltd  
China Petroleum Engineering Corp  
CNPC Capital Company Ltd  
CNPC General Capital Ltd  
CNPC HK Overseas Capital Ltd  
Kunlun Energy Company Ltd  
Kunlun Financial Leasing Co Ltd  
PetroChina

---

China National Offshore Oil Corp Ltd (CNOOC)  
China BlueChemical Ltd  
China Oilfield Services Ltd (COSL)  
CNOOC Curtis Funding No.1 Pty Ltd  
CNOOC Finance Limited  
CNOOC Nexen Finance  
COSL Finance (BVI) Limited  
COSL Singapore Capital Ltd

---

China Petrochemical Corporation (Sinopec Group)  
China Petroleum & Chemical Corp (CPCC) Sinopec  
Sinopec Capital 2013 Ltd  
Sinopec Century Bright Capital Investment Ltd  
Sinopec Engineering Group Co Ltd  
Sinopec Group Overseas Development 2012-2017  
Sinopec Kantons Holdings Ltd  
Sinopec Oilfield Equipment Corp  
Sinopec Oilfield Service Corp  
Sinopec Shanghai Petrochemical

---

Gazprom  
Gazprom Neft  
Gazprom Promgaz  
GPN Capital SA  
Territorial Generating Company No 1  
Indian Oil Corp Ltd (IOCL)  
Mosenergo

---

Oil & Natural Gas Corp (ONGC)  
Hindustan Petroleum Corp Ltd  
Mangalore Refinery & Petrochemicals Ltd  
ONGC Videsh Limited (OVL)

---

Petrolia Nasional (Petronas)  
Engen Botswana  
Gas District Cooling Putrajaya Sdn Bhd  
KLCC Property Holdings Bhd  
Malaysia Marine & Heavy Engineering Holdings Bhd  
MISC Berhad  
Petronas Capital Limited  
Petronas Chemicals Bhd  
Petronas Dagangan Bhd  
Petronas Gas Berhad  
Petronas Global Sukuk  
Putrajaya Management Sdn Bhd

### Removed effective 09/22/2020:

none