

**MARYLAND STATE RETIREMENT AND PENSION SYSTEM
IMPLEMENTATION OF THE 2008 DIVESTITURE FROM IRAN AND
SUDAN ACT**

April 1, 2025 – September 30, 2025

State Retirement Agency of Maryland

October 29, 2025

Maryland State Retirement and Pension System
Implementation of the 2008 Divestiture from Iran and Sudan Act as of October 1, 2025
State Personnel and Pensions Article, § 21-123.1

This is the required semi-annual report for the period commencing April 1, 2025, and ending September 30, 2025 (the “Reporting Period”), and includes the following:

- 1) a summary of correspondence with companies engaged by the Board of Trustees during the Reporting Period;
 - 2) all divestment actions taken by the Board of Trustees in accordance with the Act during the Reporting Period;
 - 3) a list of companies doing business in Iran or Sudan which the Board of Trustees has determined during the Reporting Period to be ineligible for investments of net new funds under the terms of the Act; and
 - 4) other developments relevant to investment in companies doing business in Iran or Sudan.
1. A summary of correspondence with companies engaged by the Board of Trustees during the Reporting Period.

The Maryland State Retirement and Pension System (the “Retirement System”) has engaged MSCI ESG Research Inc. (“MSCI ESG”) to periodically provide a list of companies doing business in Iran and/or Sudan (“Focus List”), and to manage the engagement process for the Retirement System. MSCI ESG provided a Focus List dated as of July 1, 2025.

As of the end of the Reporting Period, the Retirement System has not engaged with any companies regarding divestment as no new companies were listed as doing business in Iran and Sudan.

2. All divestment actions taken by the Board of Trustees during the Reporting Period.

During the Reporting Period, the Board of Trustees removed the following companies from the list of restricted securities:

1. Perseus Mining Limited
2. Petroliam Nasional Berhad (Petronas)

3. Companies doing business in Iran or Sudan, which the Board of Trustees has determined during the Reporting Period to be ineligible for investments of net new funds under the terms of the Act.

At its meeting on September 9, 2025, the Board of Trustees determined that the following companies are not eligible for investment and directed that managers of eligible accounts be notified of the restriction.

<u>OPERATING IN SUDAN OR IRAN</u>	<u>COMPANY NAME</u>	<u>BUSINESS ACTIVITY as defined in SPP 21- 123.1</u>	<u>COUNTRY</u>
Iran and Sudan	China National Petroleum Corporation (PetroChina Co)	Oil related	China
Iran and Sudan	China Petrochemical Corporation	Oil related	China
Iran, Sudan	CNPC Global Capital Limited	Oil related	China
Iran and Sudan	CNPC (HK) Overseas Capital Ltd	Oil related	British Virgin Islands
Iran and Sudan	CNPC General Capital Limited	Oil related	British Virgin Islands
Iran	Gaz Capital S.A.	Oil related	Luxembourg
Iran	Gaz Finance PLC	Oil related	United Kingdom
Iran	Gazprom Capital OOO	Oil related	Russia
Iran	Gazprom PAO	Oil related	Russia
Sudan	Harbin Power Equipment Company Limited	Oil related	China
Sudan	Managem S.A.	Mineral extraction activities	Morocco
Sudan	Oil and Natural Gas Corporation Limited	Oil related	India
Sudan	Oil India International PTE. LTD	Oil related	Singapore
Sudan	Oil India Limited	Oil related	India
Sudan	ONGC Videsh Limited	Oil related	India
Sudan	Siemens Financieringsmaatschappij N.V.	Power production	Netherlands
Iran and Sudan	Sinopec Group Overseas Development (2013) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2015) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2016) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2017) Limited	Oil related	British Virgin Islands
Iran and Sudan	Sinopec Group Overseas Development (2018) Limited	Oil related	British Virgin Islands

4. Other developments relevant to investments in companies doing business in Iran or Sudan.

A. In discharging their responsibilities under the Act, the Board of Trustees and its Corporate Governance and Securities Litigation Committee receive and review information gathered through the engagement process, as well as input from (i) the System's vendor MSCI ESG, (ii) Meketa Investment Group, Inc., the System's general investment consultant, (iii) legal counsel and, (iv) staff of the Investment Division.

The information presented to the Board of Trustees and its Corporate Governance and Securities Litigation Committee considers a wide array of factors, including:

1. initial and ongoing divestment costs on both an individual and aggregate level;
2. company impact on aggregate, fund-level returns and managers; and
3. representation of companies in the relevant investment benchmarks, including:
 - i. representation of companies in sectors and industries; and
 - ii. representation of companies in various investment benchmarks.

B. The Board of Trustees recognizes that it has a continuing monitoring and reporting obligation. MSCI ESG is providing ongoing monitoring services, and the general investment consultant, State Retirement Agency staff, and legal counsel will continue to assist the Corporate Governance and Securities Litigation Committee in reviewing matters regarding the Act.