



Ohio Public Employees Retirement System

August 24, 2011

Mr. Aristotle Hutras
Director
Ohio Retirement Study Council
88 East Broad Street
Suite 1175
Columbus, OH 43215

Dear Mr. Hutras:

The purpose of this letter is to provide you with information regarding the status of the Iran and Sudan Divestiture Policy ("Policy") adopted by the Ohio Public Employees Retirement System ("OPERS") Board in September 2007. This Policy, which is continually assessed, establishes guidelines for OPERS to follow when identifying, engaging or investing in companies with ties to Iran and/or Sudan.

Attached is the semi-annual report that was provided to the OPERS Board Members in August 2011. This semi-annual report covers the period from January 1 through June 30, 2011. The number of scrutinized companies whose securities were owned in OPERS' funds decreased from 25 to 23 while their total market value increased by \$54,274,000 (from \$428,502,000 to \$482,776,000). During this period, OPERS' staff began to implement OPERS Board's reallocation of the funds' assets by engaging nine new Non-U.S. equity managers and funding their portfolios with \$655,000,000 that was previously allocated to U.S. equity portfolios.

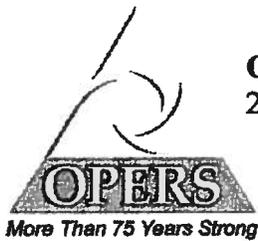
Pursuant to the Policy, OPERS' staff continues to engage each scrutinized company through written communication in a continual effort to understand the company's business ties with Iran and/or Sudan. The Policy was adopted, partly, in response to actions of the government and military forces of the Republic of the Sudan, the capital of which is Khartoum. On July 9, 2011, southern states of Sudan declared their independence from Khartoum and formed the Republic of South Sudan. Staff is evaluating implications of these developments.

If you have any questions or need any additional information, please let me know.

Sincerely,

Karen Carraher
Executive Director

Attachment



OHIO PUBLIC EMPLOYEES RETIREMENT SYSTEM
277 EAST TOWN STREET, COLUMBUS, OH 43215-4642
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www.opers.org

MEMORANDUM

DATE: August 16, 2011
TO: OPERS Board Members
FROM: Alan Davidson, Fiduciary Compliance Investment Officer
RE: **Semi-Annual Iran and Sudan Divestment Update**

Purpose

The Board's Iran and Sudan Divestment Policy ("Policy") requires Staff to report regularly concerning its administration and this is the ninth such report. It details progress since Staff's February 2011 report.

Background

The Policy, as adopted in September 2007 and revised in December 2010:

- Applies to publicly-traded stocks and bonds in the Non-U.S. Equity and Fixed Income Asset Classes that are actively managed in separate accounts within the Defined Benefit and Health Care Funds ("Funds");
- Is consistent with fiduciary duties;
- Establishes a goal of reducing investment exposure to companies with ties to Iran and Sudan when comparable investments offering similar quality, return and safety are available; and
- Requires Staff to develop a procedure to identify and engage companies with ties to Iran and/or Sudan.

To administer the Policy, Staff created an Iran and Sudan Divestment Committee ("ISDC") whose members are OPERS General Counsel, its Director-External Relations and its Fiduciary Compliance Investment Officer. Other Staff members participate in ISDC activities, as required.

Scrutinized Companies

The ISDC's Screening Criteria, included as Attachment A, remain unchanged. As previously reported, a screening vendor, Legacy KLD/IS, helps identify companies that meet these Criteria. The Scrutinized Company List ("List") in effect from January 1 through June 30, 2011 is included as Attachment B. It reflects a net decrease of 9 names from the version in effect from July 1 until December 31, 2010.

Exposure to Scrutinized Companies

OPERS' exposure to Scrutinized Companies as of June 30, 2011 is detailed in Attachment C. It shows that, between January 1 and June 30, 2011, the number of Scrutinized Companies whose securities were owned by the Funds decreased from 25 to 23 while their total market value increased by \$54,274,000 (from \$428,502,000 to \$482,776,000). During this period, Staff began to implement the Board's reallocation of the Funds' assets by engaging 9 new Non-U.S. Equity managers and funding their portfolios with \$655,000,000 that was previously allocated to U.S. Equity portfolios.

Managers cite a lack of comparable securities offering similar quality, return and safety as their reason for holding securities of companies on the List.

Engagement Update

OPERS screening vendor provided Staff with an initial list of 87 companies that appeared to meet the ISDC's screening criteria. On May 20, 2011, Staff sent letters to each of these companies. If an identified company provided information about its business activities in Iran and/or Sudan, and the firm included the rationale of why it believed the company did not meet OPERS' screening criteria, Staff sent such information to the screening vendor for review. The screening vendor performed additional research to determine if the company merited continued inclusion on the List, which reduced the number of companies on it to 82. Staff also continues its outreach to other institutional investors regarding Iran and/or Sudan divestment issues.

Next Steps

The Policy was adopted, partly, in response to actions of the government and military forces of the Republic of the Sudan, the capital of which is Khartoum. On July 9, 2011, southern states of Sudan declared their independence from Khartoum and formed the Republic of South Sudan. Staff is evaluating implications of these developments.

Staff will continue to administer the Policy and report again to the Board in February 2012.

Attachment A: OPERS Iran and Sudan Divestment Committee Screening Criteria

1. A Scrutinized Company is one that:
 - (a) has business operations that involve contracts with or provision of supplies or services to:
 - (i) the government of Sudan;
 - (ii) companies in which the government of Sudan has any direct or indirect equity share;
 - (iii) consortiums or projects commissioned by the government of Sudan; OR
 - (iv) companies involved in consortiums or projects commissioned by the government of Sudan; AND
 - (b) either (i) or (ii) of the following applies:
 - (i) (A) More than 10% of its revenues or assets that are linked to Sudan oil-related activities or mineral extraction activities;
(B) Less than 75% of its revenues or assets linked to Sudan involve contracts with or provision of oil-related or mineral-extracting products or services to the regional government of southern Sudan or a project or consortium created exclusively by that regional government; AND
(C) The company has failed to take substantial action specific to Sudan; OR
 - (ii) (A) More than 10% of its revenues or assets that are linked to Sudan involve power production facilities;
(B) Less than 75% of its power production activities include projects whose intent is to provide power or electricity to the marginalized populations of Sudan; AND
(C) The company has failed to take substantial action specific to Sudan; OR
2. A Company is complicit in the Darfur genocide; OR
3. A Company supplies military equipment within Sudan; OR
4. A Company has business operations involving contracts with or providing supplies or services to:
 - (i) the government of Iran;
 - (ii) companies in which the government of Iran has any direct or indirect equity share;
 - (iii) consortiums or projects commissioned by the government of Iran; OR
 - (iv) companies involved in consortiums or projects commissioned by the government of Iran; AND
 - (v) More than 10% of its revenues or assets are linked to Iran oil-related activities, mineral extraction activities or petroleum resources.

The following definitions are used for determining inclusion on the OPERS Iran and Sudan Divestment Committee Screening Criteria:

Military Equipment The active business operation must be involved with the production, distribution, leasing, or supply of weapons, arms, military supplies or military equipment in Iran or Sudan; or in the supply of goods and services to any armed force actively participating in the conflict in Sudan.

Mineral Extraction The active business operation must be involved in the exploration, extraction, transporting or wholesale selling or trading of elemental minerals or associated metal alloys oxides; or the facilitation of such operations through service and supply activities.

Oil Related Activities The active business operation must be involved with owning rights to oil blocks, exporting, extracting, producing, refining, processing, exploring for, transporting, or trading of oil; or, constructing, maintaining, or operating a pipeline, refinery, or other oil-field infrastructure; or facilitating such operations through service and supply activities.

Power Production Activities The active business operation must be involved in any business operation that involves a project commissioned by the national electric corporation of Sudan or other similar entity of the government of Sudan, whose purpose is to facilitate power generation and delivery; or facilitating such operations through service and supply activities.

Substantial Action Adopting, publicizing, and implementing a formal plan to cease scrutinized business operations within one year and to refrain from any such new business operations; undertaking significant humanitarian efforts in conjunction with an international organization, the government of Sudan, the regional government of southern Sudan, or a nonprofit entity evaluated and certified by an independent third party to be substantially in a relationship to the company's Sudan business operations and of benefit to one or more marginalized populations of Sudan; or through engagement with the government of Sudan, materially improving conditions for the genocidally victimized population in Darfur.

Complicit Taking actions during any preceding twenty-month period that directly support or promote the genocidal campaign in the Darfur region of Sudan, including, but not limited to, preventing members of the populations of the Darfur region of Sudan negatively affected by genocide from communicating with each other, encouraging Sudanese citizens to speak against the internationally approved security force that provides aide to the Darfur region; actively working to deny, cover up, or alter the record on human rights abused in Darfur; or other similar actions.

Attachment B: January 1 – June 30, 2011 Scrutinized Company List

Alstom	Kejuruteraan Samudra Timur Bhd
Aref Investment Group	KingDream PLC
Areva CI	KLCC Property Holdings Bhd.
Areva T&D India Ltd	Kunlun Energy Co. Ltd.
Arzamas Machine Building Plant	La Mancha Resources, Inc.
ASEC Company for Mining	Lanka IOC Plc
Atlas Copco (India) Ltd	Linde AG
Atlas Copco AB	LS Industrial Systems Co. Ltd.
AviChina Industry & Technology Company Limited	Malaysia Marine & Heavy Engineering Holdings
Bharat Heavy Electricals, Ltd.	MAN SE
Cedec SA Luxembourg	Managem SA
Chennai Petroleum Corp Ltd	Mangalore Refinery & Petrochemicals Ltd
China Avic Avionics Equipment Co, Ltd.	MISC Berhad
China National Petroleum Corp.	Mosenergo
CNOOC Ltd.	NAM Fatt BHD
Daelim Industrial Co., Ltd.	Norinco International Cooperation, Ltd.
Daqing Huake Group Co Ltd	Oil & Natural Gas Corp., Ltd.
DongFeng Automobile Co Ltd	Oil India Limited
Dongfeng Motor Group Co Ltd	OMV AG
Egypt Kuwait Holding Co. S.A.E.	OMV Petrom SA
El Sewedy Cables Holding Corp.	PECD Bhd.
Electricity Generating PCL	PetroChina Company Limited
Elf Aquitaine	Petrofac Limited
Elnusa PT	Petronas Dagangan Bhd
Engineers India Limited	Petronas Gas Berhad
Eni SpA	PTT Exploration & Production PCL

Eurogold, Ltd.	Ranhill Bhd
Finmeccanica SpA	Revathi Equipment Ltd
GAZ Group	Royal Dutch Shell Plc
Gazprom Neft	Sasol Limited
Gazprom OAO	Scomi Engineering BHD
Groupe ONA SA	Scomi Group Bhd
GS E&C	Sinopec Kantons Holdings Ltd
GS Holdings Corp.	Sinopec Shanghai Petrochemical Company Limited
Hafei Aviation Industry Co Ltd	Sinopec Yizheng Chemical Fibre Co., Ltd.
Harbin Dongan Auto Engine Co	Snam Rete Gas S.p.A.
Harbin Power Equipment	Sudan Telecommunications (Sudatel)
Hyundai Engineering and Construction Co.	Technip
Immobiliere Dassault SA	Total Nigeria Plc
Indian Oil Corp Ltd	Total S.A.
Intertek Group PLC	Wartsila Oyj
Jiangxi Hongdu Aviation Industry Corp Ltd	Welspun Corporation, Ltd.
Jinan Diesel Engine Company, Ltd.	Wuhan Boiler Co
Kamaz	

Attachment C: Exposure to Scrutinized Companies

Issuer	June 30, 2011		December 31, 2010	
	# Shares	Market Value (\$000 omitted)	# Shares	Market Value (\$000 omitted)
Stocks				
Alstom	0	0	50,010	2,397
Atlas Copco	482,610	12,698	482,610	12,206
Bharat Heavy Electricals, Ltd.	65,900	3,024	0	0
China Petroleum & Chemical	50,556,000	50,866	22,918,000	21,936
CNOOC	32,247,634	85,167	29,384,000	69,706
Dongfeng Motor Group	11,514,000	21,749	8,532,000	14,708
Electricity Generating	0	0	634,878	924
ENI	0	0	1,820,734	39,821
Finmeccanica	127,351	1,541	389,100	4,429
Gazprom	4,850,568	70,721	1,242,588	31,375
GS Engineering & Construction	35,879	4,697	0	0
GS Holdings	0	0	45,560	3,917
Harbin Power Equipment	244,000	278	756,000	1,192
KLCC Property Holdings **	130,700	145		
Linde	171,060	29,642	78,463	12,102
Lukoil *			174,820	9,877
Malaysia Marine & Engineering **	387,700	1,069		
MAN *			151,449	18,325
OMV	200,282	8,747	188,706	7,855
Petrochina	7,877,566	16,661	112,000	146
Petronas	244,600	1,304	480,200	1,740
PTT	343,200	1,911	628,936	6,695
Royal Dutch Shell	1,872,187	66,594	2,266,590	74,963
Sasol, Ltd.	178,410	9,398	0	0
Statoil *			227,000	5,407
Technip	47,700	5,112	65,600	6,067
Total	1,503,191	85,786	1,173,143	62,260
Wartsila	13,084	442	6,542	500
Welspun, Ltd.	43,984	170	0	0
Totals	113,137,606	477,722	71,808,929	408,548
Fixed Income				
ENI		0		6,000
Gazprom		5,054		5,467
Motiva Enterprises *				3,487
Statoil *				5,000
Total Market Value		482,776		428,502
Number of Issuers	23		25	

* Indicates issuer was removed from OPERS Scrutinized Company list effective January 1, 2011

** Indicates issuer was added to OPERS Scrutinized Company list effective January 1, 2011

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MEMORANDUM

DATE: August 17, 2010

TO: OPERS Board Members

FROM: Deanne Rau, Portfolio Manager - External Public Markets

RE: **Iran and Sudan Divestment Update**

Purpose

This memo provides a six month progress report on the Iran and Sudan Divestment Policy (Policy). This is the seventh report since the implementation of the Policy. It provides an overview of the company screening criteria, the list of scrutinized companies and updates on engagement initiatives and divestment activity.

Background

In September 2007, the OPERS Iran and Sudan Divestment Policy was approved. Key features of the Policy include the following:

- Applies to public stocks and bonds in the Non-U.S. Equity and Fixed Income asset classes that are actively managed through separate accounts within the Defined Benefit and the Health Care Funds.
- Is consistent with fiduciary duties.
- Establishes a goal of reducing investment exposure to companies with ties to Iran and Sudan when comparable investments offering similar quality, return and safety are available.
- Requires staff to develop an Iran and Sudan Divestment Process to identify and engage companies with ties to Iran and/or Sudan. Staff is also required to report the company screening criteria, the list of scrutinized companies and summary risk and return impacts from divestment activity.

Staff created the Iran Sudan Divestment Committee (ISDC) to identify and engage companies. Current members of the ISDC include General Counsel, Director-External Relations, Portfolio Manager-External Public Markets, with other Staff members participating as required. Since December 31, 2007, ISDC has spent over 1073 hours on Iran Sudan Divestment work and meeting Policy requirements.

Scrutinized Companies

The OPERS ISDC Screening Criteria (shown as Attachment A) remains unchanged from the last update to the Investment Committee; and staff used RiskMetrics/ISS to help identify companies that meet the screening criteria. The OPERS Scrutinized Company List (List) is shown in Attachment B. This List, which went into effect on January 1, 2010, has been provided to all impacted external and internal investment managers. This version of the List remained in effect until July 1, 2010 when a new List was produced and provided to investment managers. Information on OPERS exposure to companies on the updated List will be provided at the February 2011 Investment Committee meeting.

Exposure to Scrutinized Companies

During the period of January 1, 2010 to June 30 2010, OPERS' exposure to scrutinized companies changed from 17 names representing approximately \$339 million in exposure to 20 names and approximately \$372 million in exposure. The increase in dollar exposure was primarily due to an increase in fixed income exposure, notably short-term commercial paper, to scrutinized names. The names on the List continued to be skewed towards the energy sector.

A listing of OPERS' exposure to scrutinized companies is provided in Attachment C. This listing provides the consolidated exposure to scrutinized names for both the OPERS Defined Benefit and Health Care Funds. For the scrutinized names that OPERS continues to own, the primary reason cited by investment managers was a lack of comparable securities offering similar quality, return and safety.

Engagement Update

OPERS' Iran and Sudan Divestment screening vendor, RiskMetrics/ISS, provided OPERS with a list of 96 companies that met OPERS' Iran and Sudan divestment screening criteria. On June 15, 2010, OPERS Corporate Governance Department sent letters to each identified company. When an identified company provides OPERS information about its business activities in Iran and/or Sudan, and the firm includes rationale why it believes the company did not meet OPERS' screening criteria, the information is forwarded to the screening vendor. The screening vendor then performs additional research to determine if the company merits continued inclusion on the List.

Since the beginning of the year, the Corporate Governance Department has also been in contact with other institutional investors and participated in a Council of Institutional Investors conference call regarding Iran and/or Sudan divestment issues.

Next Steps

Staff continues to administer the Policy and will provide another status report at the February 2011 Investment Committee.

Attachment A: OPERS Iran and Sudan Divestment Committee Screening Criteria

OPERS IRAN AND SUDAN DIVESTMENT COMMITTEE

SCREENING CRITERIA

1. Company:
 - (a) has business operations that involve contracts with or provision of supplies or services to:
 - (i) the government of Sudan;
 - (ii) companies in which the government of Sudan has any direct or indirect equity share;
 - (iii) consortiums or projects commissioned by the government of Sudan; **OR**
 - (iv) companies involved in consortiums or projects commissioned by the government of Sudan; **AND**
 - (b) either (i) or (ii) of the following:
 - (i) (A) More than 10% of its revenues or assets that are linked to Sudan oil-related activities or mineral extraction activities;
(B) Less than 75% of its revenues or assets that are linked to Sudan involve contracts with or provision of oil-related or mineral-extracting products or services to the regional government of southern Sudan or a project or consortium created exclusively by that regional government; **AND**
(C) The company has failed to take substantial action specific to Sudan; **OR**
 - (ii) (A) More than 10% of its revenues or assets that are linked to Sudan involve power production facilities;
(B) Less than 75% of its power production activities include projects whose intent is to provide power or electricity to the marginalized populations of Sudan; **AND**
(C) The company has failed to take substantial action specific to Sudan; **OR**
2. Company is complicit in the Darfur genocide; **OR**
3. Company supplies military equipment within Sudan; **OR**
4. Company has
 - (a) has business operations that involve contracts with or provision of supplies or services to:
 - (i) the government of Iran;
 - (ii) companies in which the government of Iran has any direct or indirect equity share;
 - (iii) consortiums or projects commissioned by the government of Iran; **OR**

- (iv) companies involved in consortiums or projects commissioned by the government of Iran; **AND**
- (v) More than 10% of its revenues or assets that are linked to Iran oil-related activities, mineral extraction activities or petroleum resources.

The following definitions will be used for determining inclusion on the OPERS Iran and Sudan Divestment Committee Screening Criteria:

Military Equipment – the active business operation must be involved with the production, distribution, leasing, or supply of weapons, arms, military supplies or military equipment in Iran or Sudan; or in the supply of goods and services to any armed force actively participating in the conflict in Sudan.

Mineral Extraction – the active business operation must be involved in the exploration, extraction, transporting or wholesale selling or trading of elemental minerals or associated metal alloys oxides; or the facilitation of such operations through service and supply activities.

Oil Related Activities – the active business operation must be involved with owning rights to oil blocks, exporting, extracting, producing, refining, processing, exploring for, transporting, or trading of oil; or, constructing, maintaining, or operating a pipeline, refinery, or other oil-filed infrastructure; or facilitating such operations through service and supply activities.

Power Production Activities – the active business operation must be involved in any business operation that involves a project commissioned by the national electric corporation of Sudan or other similar entity of the government of Sudan, whose purpose is to facilitate power generation and delivery; or facilitating such operations through service and supply activities.

Substantial action-adopting, publicizing, and implementing a formal plan to cease scrutinized business operations within one year and to refrain from any such new business operations; undertaking significant humanitarian efforts in conjunction with an international organization, the government of Sudan, the regional government of southern Sudan, or a nonprofit entity evaluated and certified by an independent third party to be substantially in a relationship to the company's Sudan business operations and of benefit to one or more marginalized populations of Sudan; or through engagement with the government of Sudan, materially improving conditions for the genocidally victimized population in Darfur.

Complicit-taking actions during any preceding twenty-month period that directly support or promote the genocidal campaign in the Darfur region of Sudan, including, but not limited to, preventing members of the populations of the Darfur region of Sudan negatively affected by genocide from communicating with each other, encouraging Sudanese citizens to speak against the internationally approved security force that provides aide to the Darfur region; actively working to deny, cover up, or alter the record on human rights abused in Darfur; or other similar actions.

Attachment B: OPERS Scrutinized Company List

List of Scrutinized Companies:	January 1, 2010 to June 30, 2010
Alstom	Kunlun Energy Co. Ltd.
Aref Investment Group	La Mancha Resources, Inc.
Areva CI	Lanka IOC Plc
Areva T&D India Ltd	Linde AG
Arzamas Machine Building Plant	LS Industrial Systems Co. Ltd.
Atlas Copco (India) Ltd	Lukoil OAO
Atlas Copco AB	MAN SE
AviChina Industry & Technology Company Limited	Managem SA
Bharat Heavy Electricals, Ltd.	Mangalore Refinery & Petrochemicals Ltd
Cedec SA Luxembourg	Midciti Resources SDN BHD
Chennai Petroleum Corp Ltd	MISC Berhad
China Avic Avionics EquipmentCo, Ltd.	Mosenergo
China National Petroleum Corp.	NAM Fatt BHD
China North Industries Group Corporation	Norinco International Cooperation Ltd
China Petroleum & Chemical Corporation	Oil & Natural Gas Corp Ltd
CNOOC Ltd.	Oil India Limited
Daelim Industrial Co., Ltd.	OMV AG
Daqing Huake Group Co Ltd	OMV Petrom SA
DongFeng Automobile Co Ltd	PECD Bhd.
Dongfeng Motor Group Co Ltd	PetroChina Company Limited
Egypt Kuwait Holding Co. S.A.E.	Petrofac Limited
Electricity Generating PCL	Petroliam Nasional Bhd
Elf Aquitaine	Petronas Dagangan Bhd
Elmusa PT	Petronas Gas Berhad
Engineers India Limited	PTT Exploration & Production PCL
Eni SpA	Putrajaya Holdings Sdn Bhd
Finmeccanica SpA	Ranhill Bhd
GAIL (India) Limited	Revathi Equipment Ltd
GAZ Group	Royal Dutch Shell Plc
Gazprom Neft	Sasol Limited
Gazprom OAO	Scomi Engineering BHD
Groupe ONA SA	Scomi Group Bhd
GS E&C	Seadrill Ltd
GS Holdings Corp.	SINOHYDRO Corp
Hafei Aviation Industry Co Ltd	Sinopec Finance Co. Ltd.
Harbin Dongan Auto Engine Co	Sinopec Kantons Holdings Ltd
Harbin Power Equipment	Sinopec Shanghai Petrochemical Company Limited

Hyundai Engineering and Construction Co.	Sinopec Yizheng Chemical Fibre Co., Ltd.
Immobiliere Dassault SA	Smith International, Inc.
Indian Oil Corp Ltd	Snam Rete Gas S.p.A.
Intertek Group PLC	Statoil ASA
Jiangxi Hongdu Aviation Industry Corp Ltd	Sudan Telecommunications (Sudatel)
Kamaz	Technip
Kejuruteraan Samudra Timur Bhd	Total Nigeria Plc
KingDream PLC	Total S.A.
KMC Oiltools Bermuda Ltd	Wartsila Oyj
KMCOB Capital Bhd	Welspun-Gujarat Stahl Rohren Limited
Korea Plant Service & Engineering Co. Ltd.	Wuhan Boiler Co

Attachment C: Exposure to Scrutinized Companies
January 1, 2010 to June 30, 2010

Company Name	Shares 1/1/2010	Market Value 1/1/2010
Alstom	94,112	6,814,528
Atlas Copco	741,501	10,909,977
China Petroleum & Chemical Corp	9,584,600	8,539,709
CNPC Hong Kong	1,632,000	2,038,716
Dongfeng Motor Group	6,460,000	9,313,083
Electricity Generating PCL	310,100	733,261
Eni SpA	8,302,100	38,919,802
Fimmeccanica SpA	35,900	575,512
Gazprom OAD	381,666	9,219,933
Linde AG	100,583	12,138,829
LUKOIL	303,198	17,373,131
PetroChina Co Ltd	3,228,000	3,878,427
Petroleo Brasileiro SA	2,512,428	92,250,421
Royal Dutch Shell	2,388,031	71,100,008
Statohydro-ASA	630,420	15,756,264
Total SA	432,410	27,878,566
TOTAL	38,997,027	327,249,180.00
Alcatel-Lucent (Fixed Income)		283,750.00
Gazprom Capital (Fixed Income)		1,470,300.00
Petroleo Brasileiro SA (Fixed Income)		9,689,000.00
GRAND TOTAL	38,997,027	338,692,230.00
NUMBER OF COMPANIES	17	

Company Name	Shares 6/30/2010	Market Value 6/30/2010
Atlas Copco	482,610	7,116,233
China Petroleum & Chemical Corp	11,414,000	9,305,887
CROCC Ltd	26,525,000	45,557,780
Dongfeng Motor Group	9,222,000	10,888,610
Electricity Generating PCL	310,100	781,945
ENI SpA	1,876,834	31,148,619
Fimmeccanica SpA	389,100	4,053,692
GAIL India, Ltd	96,772	866,310
Gazprom OAD	4,055,353	25,406,497
G&S Holdings	17,210	540,894
Harbin Power Equipment	532,000	393,198
Linde AG	78,463	8,299,883
OMV AG	19,899	502,035
PetroChina Co Ltd	2,276,000	2,582,819
Royal Dutch Shell	2,458,635	61,610,689
Sinopec Shanghai Petrochemical Company	278,000	108,387
Smith International	361,711	13,518,419
Statoll ASA	639,582	12,418,118
Technip SA	135,000	7,858,355
Total SA	4,012,053	45,749,348
TOTAL	81,990,332	288,977,686.18
Eni- Commercial Paper		50,000,000
Gazprom Capital (Fixed Income)		2,735,887
Shell International (Fixed Income)		23,154,205
Smith International (Fixed Income)		6,784,883
GRAND TOTAL	81,990,332	371,852,332.06
NUMBER OF COMPANIES	20	

