School Employees Retirement System

Memo

To:

Retirement Board

cc:

Lisa Morris

From:

Julie Deisler

Date:

August 26, 2011

Re:

Iran/Sudan Update for the Quarter Ending June 30, 2011

The purpose of this memo is to update you on activities related to the Iran-Sudan Investment Policy during the quarter ending June 30, 2011. The end of this quarter also marks the end of fiscal year 2011.

As of June 30, 2011, we held 12 of the scrutinized companies on the FY 2011 benchmark list at a total market value of \$73.2 million. Compared to the FY 2011 benchmark, this is a 45% reduction in number of scrutinized companies and a 14% increase in market value. A spreadsheet that details SERS' exposure to the scrutinized companies at June 30, 2011 versus the FY 2011 benchmark is attached as Exhibit 1. In addition, attached as Exhibit 2 is a list of eight additional scrutinized companies that were not part of the FY 2011 benchmark list, but in which SERS had holdings as of June 30, 2011.

Staff continues to receive monthly updates on scrutinized companies from RiskMetrics, an independent third-party screening entity. Each month, I use this information to update the scrutinized company list and then communicate this updated list to our external investment managers. Investment managers who hold international securities subject to the Iran/Sudan Investment Policy continue to notify me in writing when purchasing any securities from scrutinized companies, giving a specific reason for each purchase. In each of these instances, I verified that the reasons our managers provided fully satisfied the requirements of our policy.

As of July 1, 2011, a new benchmark has been set for Fiscal Year 2012. The new benchmark includes all of the companies listed on Exhibit 1, as well as the eight companies listed in Exhibit 2, which are companies that have been added to the scrutinized company list over the past fiscal year. The new benchmark list, attached as Exhibit 3, is comprised of 20 scrutinized companies and has a total market value of \$78 million. This will be the baseline against which we will measure our progress in the upcoming year.

An update for the quarter ending September 30, 2011 will be provided to you in November. Please let me know if you have any questions.

Exhibit 1

SERS' Exposure to Scrutinized Companies -6/30/11 vs. FY11 Benchmark

July 1, 2010 to June 30, 2011

| SERS Positions 6/30/2010 | Shares | Market Value | SERS Positions 6/30/2011* | Shares | Σ | Market Value |
|---|------------|---------------|---|------------|----|--------------|
| Company Name | 6/30/10 | 6/30/10 | Company Name | 6/30/11 | | 6/30/11 |
| Bharat Heavy Electricals Ltd. | 38,901 | \$ 2,060,174 | | | | |
| CNO OC Ltd. | 7,242,451 | \$ 13,193,869 | CNOOC Ltd. | 5,407,883 | \$ | 14,696,035 |
| Dongfeng Motor Group | 1,272,000 | \$ 1,499,517 | Dongfeng Motor Group | 1,656,000 | \$ | 3,128,443 |
| ENI SpA | 75,500 | \$ 1,404,770 | ENI SpA | 315,199 | \$ | 7,453,528 |
| GAIL (India) Ltd.* | 876,62 | \$ 293,048 | | | | |
| Gazprom OAO | 435,872 | \$ 8,304,860 | 8,304,860 Gazprom OAO | 1,457,055 | \$ | 21,245,559 |
| Hyundai Heavy Industries | 2,190 | \$ 421,166 | Hyundai Heavy Industries | 3,104 | \$ | 1,289,397 |
| INPEX Corporation* | 559 | \$ 3,678,777 | | | | |
| Itochu Corporation* | 132,000 | \$ 1,051,644 | | | | |
| Mitsui Engineering & Shipbuilding Company | 446,000 | \$ 912,261 | Mitsui Engineering & Shipbuilding Company | 446,000 | \$ | 966,444 |
| OMV AG NPV* | 20,800 | \$ 630,324 | | | | |
| PetroChina | 692,000 | \$ 779,340 | Petrochina | 3,502 | \$ | 511,397 |
| Petrofac Ltd.* | 35,521 | \$ 630,276 | | | | : |
| Petronas Dagagnan Berhad | 22,600 | \$ 65,409 | Petronas Dagagnan Berhad | 84,500 | \$ | 450,555 |
| Repsol YPF* | 32,658 | \$ 727,885 | | | | |
| Royal Dutch Shell* | 631,425 | \$ 15,857,890 | | | | |
| Sasol | 52,679 | \$ 1,885,002 | Sasol | 150,417 | \$ | 7,901,838 |
| The Siam Cement Public Company* | 44,100 | \$ 381,229 | | | | |
| Sinopec (China Petroleum & Chemical) | 634,000 | \$ 516,993 | Sinopec (China Petroleum & Chemical) | 1,177,000 | \$ | 1,190,207 |
| StatoilHydro ASA | 129,943 | \$ 2,525,668 | StatoilHydro ASA | 107,300 | ᡐ | 2,731,018 |
| Technip | 4,600 | \$ 268,204 | | | | |
| Total SA | 153,663 | \$ 6,957,619 | Total SA | 201,387 | \$ | 11,644,686 |
| TOTAL | 12,131,936 | \$ 64,045,925 | TOTAL | 11,009,347 | \$ | 73,209,107 |
| Number of Companies | 22 | | Number of Companies | 12 | | |

| Change in Shares Owned Since 6/30/10 | (1,122,589) |
|--|-------------|
| Change in Market Value Since 6/30/10 | \$9,163,182 |
| Percentage Change in Market Value Since 6/30/10 | 14.3% |
| Change in Number of Companies Since 6/30/10 | (10) |
| Percentage Change in Number of Companies Since 6/30/10 | (45%) |
| | |

^{*}The following companies were dropped from the list by RiskMetrics between 6/30/10 and 6/30/11: GAIL (India) Ltd., INPEX Corporation, Itochu, OMV AG NPV, Petrofac, Repsol YPF, Royal Dutch Shell, and The Siam Cement Public Company.

Exhibit 2

SERS' Exposure to Companies Added to the Scrutinized List as of June 30, 2011

| SERS Positions 6/30/2011 | Shares | | Market Value | | |
|---|-----------|----|--------------|--|--|
| Company Name | 6/30/11 | | 6/30/11 | | |
| Atlas Copco AB | 5,125 | \$ | 4,061 | | |
| Egypt Kuwait Holding Co. | 888 | \$ | 1,146 | | |
| KLCC Property Holdings Berhad | 49,200 | \$ | 54,585 | | |
| Petronas Chemicals Group Berhad | 818,300 | \$ | 1,921,426 | | |
| Petronas Gas Berhad | 63,600 | \$ | 278,454 | | |
| PTT Exploration & Production Public Co. | 900 | \$ | 5,009 | | |
| PTT Public Company Ltd. | 230,600 | \$ | 2,514,272 | | |
| SINO PEC Shanghai Petrochemical | 198,000 | \$ | 88,806 | | |
| TOTAL | 1,366,613 | \$ | 4,867,759 | | |

Exhibit 3

SERS' Fiscal Year 2012 Benchmark

| SERS Positions 6/30/2011 | Shares | Market Value |
|---|------------|------------------|
| Company Name | 6/30/11 | 6/30/11 |
| Atlas Copco AB | 5,125 | \$ 4,061 |
| CNO OC Ltd. | 5,407,883 | \$ 14,696,035 |
| Dongfeng Motor Group | 1,656,000 | \$ 3,128,443 |
| Egypt Kuwait Holding Co. | 888 | \$ 1,146 |
| ENI SpA | 315,199 | \$ 7,453,528 |
| Gazprom OAO | 1,457,055 | \$ 21,245,559 |
| Hyundai Heavy Industrie s | 3,104 | \$ 1,289,397 |
| KLCC Property Holdings Berhad | 49,200 | \$ 54,585 |
| Mitsui Engineering & Shipbuilding Company | 446,000 | \$ 966,444 |
| Petrochina | 3,502 | \$ 511,397 |
| Petronas Chemicals Group Berhad | 818,300 | \$ 1,921,426 |
| Petronas Dagagnan Berhad | 84,500 | \$ 450,555 |
| Petronas Gas Berhad | 63,600 | \$ 278,454 |
| PTT Exploration & Production Public Co. | 900 | \$ 5,009 |
| PTT Public Company Ltd. | 230,600 | \$ 2,514,272 |
| Sasol | 150,417 | \$ 7,901,838 |
| Sinopec (China Petroleum & Chemical) | 1,177,000 | \$ 1,190,207 |
| SINOPEC Shanghai Petrochemical | 198,000 | \$ 88,806 |
| StatoilHydro ASA | 107,300 | \$ 2,731,018 |
| Total SA | 201,387 | \$ 11,644,686 |
| TOTAL | 12,375,960 | \$ 78,076,866 |
| Number of Companies | 20 | |