



INVESTMENT MANAGEMENT

**MEMORANDUM**

TO: Supplemental Retirement Board of Trustees

FROM: Kristopher Byrd, SRP Portfolio Manager

DATE: February 22, 2024

SUBJECT: Compliance Reporting – Fourth Quarter 2023

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**Divestment Policies and Prohibited Holdings**

In December 2023, the annual prohibited investment lists for the Supplemental Retirement Plans Group Trust were updated. Subsequently, the Supplemental Retirement Plans staff identified two prohibited holdings subject to divestment. We identified Chennai Petroleum Corp, Ltd., and Unilever PLC, which are on the Iran and Companies Boycotting Israel prohibited investment lists, respectively. Upon discovering these holdings and in accordance with our Investment Management Agreement and the Department's Divestment and Contract Prohibition Policy, we promptly notified all managers on December 22, 2023 and instructed all relevant managers to divest from these prohibited holdings within a 180-day period, starting from December 21, 2023. The Supplemental Retirement Plans staff is diligently overseeing the investment manager's portfolios to ensure the complete and timely divestment from these prohibited holdings.

**Executive Order**

BNY Mellon continued daily compliance testing for prohibited holdings identified as Communist Chinese Military-Industrial Companies (CCMC's) related to Presidential Executive Order 14032. No SRP investment managers were invested in CCMCs during the quarter.

**Investment Guidelines**

The Supplemental Retirement Plans staff continues to monitor investment manager guidelines on a daily basis. There were no material issues during the quarter.