



Pension Reserves Investment Management Board

January 19, 2024

Office of the Massachusetts Attorney General
Office of the Clerk of the Senate
Office of the Clerk of the House

Dear Honorable Andrea Campbell, Attorney General, Mr. Hurley, Senate Clerk, and Mr. James, House Clerk:

Per Chapter 42 of the Acts of 2022 of the Massachusetts Session Laws (the Act), the Pension Reserves Investment Management Board (PRIM) is required to annually report PRIM's divestment from Russian restricted securities. PRIM Staff provides Investment Managers with quarterly lists of restricted securities. Subject to market availability the managers are required to divest from said securities according to the timeline laid out in the legislation, which requires that 50% of PRIM's restrictive holdings be divested within 6 months of the security being added to the restriction list and 100% divested within 12 months of the security being added to the restriction list.

Per Section 64(f) of the Act, PRIM reports the following securities were held as of December 31, 2023. With markets at PRIM's investment managers' disposal being suspended from trading in the Russian securities and markets, our investment managers have been unable to liquidate out of the majority of positions. They continue to monitor the situation.

Company	Date Added to Restriction List	Restricted Shares at Jan 1, 2023	Activity	Restricted Shares at December 31, 2023	Corporate Action Activity	Divestment Progress
LUKOIL PJSC ADR	June 1, 2022	35,569		35,569	0%	0%
MAGNIT PJSC **	June 1, 2022	107,600	-107,600	-	0%	100%
MMC NORILSK NICKEL PJSC *	June 1, 2022	169,609	8	169,617	0%	0%
MOBILE TELESYSTEMS PJSC ADR	June 1, 2022	141,205		141,205	0%	0%
MOSCOW EXCHANGE MICEX-RTS PJSC	June 1, 2022	2,592,900		2,592,900	0%	0%
NOVATEK PJSC GDR	June 1, 2022	7,615		7,615	0%	0%
NOVOLIPETSK STEEL PJSC	June 1, 2022	47,155	-47,155	-	0%	100%
POLYUS PJSC	June 1, 2022	25,151		25,151	0%	0%
ROSNEFT OIL CO PJSC GDR	June 1, 2022	133,408		133,408	0%	0%
SBERBANK OF RUSSIA PJSC **	June 1, 2022	5,673,624	-912,572	4,761,052	-16%	0%
SEVERSTAL PAO GDR	June 1, 2022	154,523		154,523	0%	0%
SURGUTNEFTGAS PJSC ADR	June 1, 2022	126,933		126,933	0%	0%
TATNEFT PJSC ADR	June 1, 2022	56,216		56,216	0%	0%
* Corporate Action						
** Delisted ADR						

Deborah B. Goldberg, Treasurer and Receiver General, Chair
Michael G. Trotsky, CFA, Executive Director and Chief Investment Officer



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Further, PRIM reports, investment managers with indirect holdings of restricted securities have not removed restricted companies from their funds (except as part of their trading strategy – not because of divestment concerns) nor have these managers created similar actively managed funds which exclude these restricted securities.

Per Section 64(f) of the Act, attached is the most recent scrutinized companies list, effective January 1, 2024.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael G. Trotsky".

Michael G. Trotsky, CFA
Executive Director and Chief Investment Officer
Attachment



Pension Reserves Investment Management Board

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