



Pension Reserves Investment Management Board

1/18/24

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 151 of the Acts of 2007 of the Massachusetts Session Laws (the Act), the Pension Reserves Investment Management Board (PRIM) is required to annually report PRIM's divestment from Sudan restricted securities. PRIM Staff provides investment managers with quarterly lists of restricted securities. 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 subsection (b) of Section 3 of the Act, PRIM reports that no securities of companies on the scrutinized companies list were acquired in 2023.

Per subsection (d) of Section 3 of the Act, PRIM reports that 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.

Sincerely,



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

Cc: United States Special Envoy to Sudan
U.S. Department of State
2201 C Street NW
Washington, DC 20520

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

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