

MEMORANDUM

TO: All Retirement Boards

FROM: John P. Galvin, Compliance Officer

RE: Tobacco Company List

DATE: June 6, 2024

On October 22, 1997 PERAC Memo #37/1997 informed you of the adoption of Chapter 119 of the Acts of 1997. That statute prohibits retirement systems from making any new investments in stocks, securities, or other obligations of any company which derives more than 15% of its revenue from the sale of tobacco products. On December 18, 1997 PERAC sent Memo #48 regarding the implementation of Chapter 119 and the first Tobacco Company List.

Enclosed please find a Tobacco Company List dated July 2024. This list replaces any other Tobacco Company List previously sent to your board and is effective upon receipt by the retirement boards. Most of these companies appeared on previous lists and such investments were prohibited from the time the companies first appeared on the list. Please forward a copy to your investment advisors or inform them that this list is available on the PERAC website. In communicating with your investment advisors, please inform them that the Tobacco Company List is only for their Massachusetts public fund clients and that any other use of the list is strictly prohibited.

As part of its audit process, PERAC will assess the portfolio of each board to determine compliance. That review will determine if the board, after January 13, 1998, has purchased stock, securities, or other obligations of any company which derives more than 15% of its revenue from the sale of tobacco products. In the event a portfolio is not in compliance, the board must bring the portfolio into compliance by divesting in a prudent manner. Prior to taking any action, the board shall consult with PERAC.

In applying the statute to pooled funds, PERAC will assess the 15% rule against the entire pool as the board is purchasing shares in the pool not the individual holdings of the pool. Thus a pooled fund, if in violation of this standard, will be included on the list.

If you have any questions, please contact this office.

Enclosure

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TOBACCO COMPANY LIST

JULY 2024

<u>COMPANY</u>	<u>COUNTRY</u>
22 nd Century Group, Inc.	United States
Altria Group, Inc.	United States
AMCON Distributing Company	United States
B.A.T. Capital Corporation	United States
Charlie's Holdings, Inc.	United States
Fyolo Technology Corp	United States
Healthier Choices Management Corp.	United States
Performance Food Group Company	United States
Philip Morris International Inc.	United States
Pyxus International, Inc.	United States
Reynolds American Inc.	United States
Starfleet Innotec Inc	United States
Turning Point Brands, Inc.	United States
Universal Corporation	United States
Vapor Group Inc	United States
Vapor Hub International Inc.	United States
Vector Group Ltd.	United States
VPR Brands LP	United States
Wee-Cig International Corp	United States
British American Tobacco Bangladesh Co. Ltd.	Bangladesh
Badeco Adria d.d. Sarajevo	Bosnia & Herzegovina
Bulgartabac Holding AD	Bulgaria
Gotse Delchev Tabac AD	Bulgaria
Nicotiana BT Holding AD	Bulgaria
Sila Holding Plc	Bulgaria
Yuri Gagarin AD	Bulgaria
Anhui Genuine New Materials Co Ltd	China
Chengdu Hongqi Chain Co Ltd	China
Huabao Flavours & Fragrances Co Ltd	China
Mudanjiang Hengfeng Paper Co., Ltd.	China
RLX Technology Inc	China
Shenzhen Jinjia Group Co., Ltd.	China
Smoore International Holdings Ltd	China
WEili Holdings Ltd	China
Cyprus Trading Corporation Plc	Cyprus
Philip Morris CR as	Czech Republic

<u>COMPANY</u>	<u>COUNTRY</u>
Scandinavian Tobacco Group A/S	Denmark
STG Global Finance B.V.	Denmark
Eastern Company SAE	Egypt
Kumulus Vape SA	France
Karelia Tobacco Company Inc	Greece
China Boton Group Company Limited	Hong Kong
China Tobacco International HK Co Ltd	Hong Kong
Ecogreen International Group Limited	Hong Kong
Huabao International Holdings Ltd.	Hong Kong
Litu Holdings Limited	Hong Kong
Godfrey Phillips India Limited	India
ITC Limited	India
NTC Industries Ltd.	India
Sinnar Bidi Udyog Ltd.	India
VST Industries Limited	India
Indonesian Tobacco Tbk PT	Indonesia
PT Bentoel International Investama Tbk	Indonesia
PT Gudang Garam Tbk	Indonesia
PT Hanjaya Mandala Sampoerna Tbk	Indonesia
PT Wicaksana Overseas International Tbk	Indonesia
Wismilak Inti Makmur Tbk PT	Indonesia
Globrands Group Ltd.	Israel
Societe Ivoirienne des Tabacs SA	Ivory Coast
Carreras Ltd.	Jamaica
Japan Tobacco Inc.	Japan
Al-Eqbal Investment Company PLC	Jordan
Jordanian Duty Free Shops PSC	Jordan
Union Investment Corporation P.L.C.	Jordan
Union Tobacco & Cigarette Industries Co PSC	Jordan
British American Tobacco Kenya PLC	Kenya
KT&G Corporation	Korea
Kuk-Il Paper Mfg Co., Ltd.	Korea

COMPANYCOUNTRY

Tutunski Kombinat AD Prilep	Macedonia
7-Eleven Malaysia Holdings Berhad	Malaysia
Bright Packaging Industry Bhd	Malaysia
British American Tobacco (Malaysia) Berhad	Malaysia
B.A.T. Netherlands Finance B.V.	Netherlands
Imperial Brands Finance Netherlands B.V	Netherlands
Khyber Tobacco Company Ltd.	Pakistan
Pakistan Tobacco Company Ltd.	Pakistan
Philip Morris (Pakistan) Limited	Pakistan
Tri Pack Films Ltd.	Pakistan
Jerusalem Cigarette Co Ltd.	Palestinian Territory
Eurocash Spolka Akcyjna	Poland
Coka Duvanska Industrija ad Coka	Serbia
Philip Morris Operations a.d. Nis	Serbia
New Toyo International Holdings Ltd.	Singapore
Logista Integral S.A.	Spain
Miquel y Costas & Miquel, S.A.	Spain
Ceylon Tobacco Company Plc	Sri Lanka
Nolato Aktiebolag	Sweden
Swedish Match AB	Sweden
Taiwan FamilyMart Co., Ltd.	Taiwan
Tanzania Cigarette Company Ltd.	Tanzania
The West Indian Tobacco Company Ltd.	Trinidad and Tobago
Bizim Toptan Satis Magazalari AS	Turkey
British American Tobacco Uganda	Uganda
B.A.T. International Finance P.L.C.	United Kingdom
British American Tobacco Plc	United Kingdom
Imperial Brands Finance Plc	United Kingdom
Imperial Brands Plc	United Kingdom
McColl's Retail Group Plc	United Kingdom

COMPANYCOUNTRY

Cat Loi JSC
Cong ty Co phan Ngan Son

Vietnam
Vietnam

British American Tobacco (Zambia) Plc

Zambia

British American Tobacco Zimbabwe (Holdings) Ltd.

Zimbabwe