

MEMORANDUM

TO: All Retirement Boards

FROM: Thomas J. O'Donnell, Compliance Officer

RE: Tobacco Company List

DATE: December 14, 2018

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 January 2019. 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
JANUARY 2019

<u>COMPANY</u>	<u>COUNTRY</u>
22 nd Century Group, Inc.	United States
Alliance One International, Inc.	United States
Altria Group, Inc.	United States
AMCON Distributing Company	United States
American Heritage International Inc.	United States
Apollo Global Management, LLC	United States
B.A.T. Capital Corporation	United States
Core-Mark Holding Company, Inc.	United States
Electronic Cigarettes International Group, Ltd	United States
Energy Transfer Operating, L.P.	United States
Gilla Inc.	United States
Healthier Choices Management Corp.	United States
Icon Vapor Inc.	United States
Medigreen Holdings Corporation	United States
Newgen Concepts Inc	United States
Philip Morris International Inc.	United States
Reynolds American Inc.	United States
Schweitzer Mauduit International, Inc.	United States
Smokefree Innotec Inc	United States
Standard Diversified Inc.	United States
Turning Point Brands, Inc.	United States
Universal Corporation	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
Fabrika Duhana Sarajevo dd Sarajevo	Bosnia & Herzegovina
Bulgartabac Holding AD	Bulgaria
Gotse Delchev Tabac AD	Bulgaria
Nicotiana BT Holding AD	Bulgaria
Shumen Tabac AD	Bulgaria
Slantse Stara Zagora Tabak AD	Bulgaria
Stara Planina Hold AD	Bulgaria
Yuri Gagarin AD	Bulgaria
George Weston Limited	Canada

<u>COMPANY</u>	<u>COUNTRY</u>
Kimree Inc.	China
Mudanjiang Hengfeng Paper Co., Ltd.	China
Shenzhen Jinjia Group Co., Ltd.	China
Shiner International Inc	China
Xinjiang Bai Hua Cun Co., Ltd.	China
Valorem S.A.	Columbia
CTO Public Company Ltd	Cyprus
Philip Morris CR as	Czech Republic
Scandinavian Tobacco Group A/S	Denmark
Eastern Company SAE	Egypt
Christian Dior S.E.	France
Karelia Tobacco Company Inc SA	Greece
Century City International Holdings Limited	Hong Kong
China Flavors and Fragrances Company Ltd.	Hong Kong
China Fortune Investments (Holding) Limited	Hong Kong
Huabao International Holdings Ltd.	Hong Kong
Sheen Tai Holdings Group Company Ltd.	Hong Kong
Godfrey Phillips India Limited	India
Golden Tobacco Ltd.	India
ITC Limited	India
NTC Industries Ltd.	India
Sinnar Bidi Udyog Ltd	India
Virat Crane Industries Ltd	India
VST Industries Limited	India
Globrands Group Ltd	Israel
Knafaim Holdings Ltd.	Israel
PT Bentoel Internasional Investama Tbk	Indonesia
PT Gudang Garam Tbk	Indonesia
PT Hanjaya Mandala Sampoerna Tbk	Indonesia
Wismilak Inti Makmur Tbk PT	Indonesia
Societe Ivoirienne des Tabacs SA	Ivory Coast
Carreras Ltd	Jamaica

COMPANYCOUNTRY

Japan Tobacco Inc.	Japan
Mitsui & Co., Ltd.	Japan
Yahoo Japan Corporation	Japan
Al-Eqbal Investment Company PSC	Jordan
Jordanian Duty Free Shops PSC	Jordan
Union Investment Corporation PSC	Jordan
Union Tobacco & Cigarette Industries Co PSC	Jordan
British American Tobacco Kenya Ltd	Kenya
BGF Co., Ltd.	Korea
KT&G Corporation	Korea
Lotte Corporation	Korea
Nongshim Holdings	Korea
SK Chemicals Co., Ltd.	Korea
SK Discovery Co., Ltd.	Korea
Tutunski Kombinat AD Prilep	Macedonia
Veles Tabak AD Veles	Macedonia
Press Corporation Ltd.	Malawi
7 Eleven Malaysia Holdings Berhad	Malaysia
Bright Packaging Industry Bhd	Malaysia
British American Tobacco (Malaysia) Berhad	Malaysia
Sime Darby Berhad	Malaysia
Duvanski Kombinat ad u stecaju Podgorica	Montenegro
Schiphol Nederland B.V.	Netherlands
Khyber Tobacco Company Ltd.	Pakistan
Pakistan Tobacco Company Ltd.	Pakistan
Philip Morris (Pakistan) Limited	Pakistan
Jerusalem Cigarette Co Ltd	Palestinian Territory
LT Group, Inc.	Philippines
Kingdom Holding Company	Saudi Arabia
British American Tobacco Vranje ad Vranje	Serbia
Coka Duvanska Industrija ad Coka	Serbia
Duvanska industrija ad Bujanovac	Serbia
Philip Morris Operations a.d. Nis	Serbia
New Toyo International Holdings Ltd	Singapore

COMPANYCOUNTRY

Hosken Consolidated Investments Limited	South Africa
Compania de Distribucion Integral Logista Holdings, S.A. Miquel y Costas & Miquel, S.A.	Spain Spain
Ceylon Tobacco Company PLC Melstacorp Limited	Sri Lanka Sri Lanka
Swedish Match AB	Sweden
Taisun Enterprise Co. Ltd. Taiwan FamilyMart Co., Ltd. Uni-President Enterprises Corp.	Taiwan Taiwan Taiwan
Tanzania Cigarette Company Ltd	Tanzania
The West Indian Tobacco Company Ltd.	Trinidad and Tobago
Bizim Toptan Satis Magazalari AS Koc Holding Anonim Sirketi	Turkey Turkey
British American Tobacco Uganda	Uganda
B.A.T. International Finance P.L.C. British American Tobacco Plc Imperial Brands Finance Plc Imperial Brands Plc	United Kingdom United Kingdom United Kingdom United Kingdom
Cat Loi JSC Cong ty Co phan Ngan Son	Vietnam Vietnam
British American Tobacco Zambia Plc	Zambia
British American Tobacco Zimbabwe (Holdings) Ltd	Zimbabwe