



Reply to request for information under Freedom of Information of Act	
Your Ref	Email dated 25 July 2024, treated as arriving 26 July 2024
Address	[REDACTED]
Request	<p>To whom it may concern,</p> <p>I'm writing to request information regarding your College's investments under the Freedom of Information Act 2000.</p> <p>Could you please provide the following information:</p> <p>1. The direct and indirect investments that your College has held in Israeli-domiciled companies, as well as any companies domiciled in the Occupied Palestinian Territories, or Occupied Syrian Golan. Please provide this information for the financial years 2019/20, 2020/21, 2021/22, 2022/23, and any information available for 2023/24.</p> <p>2. The direct and indirect investments that your College has held in companies complicit in Israeli occupation. Please provide this information for the financial years 2019/20, 2020/21, 2021/22, 2022/23, and any information available for 2023/24. As I assume that this may not a category that is accounted for in general investment reporting, please see the list below of companies that I would like this information for:</p> <p>Caterpillar Inc. J.C. Bamford Excavators Limited (JCB) Any companies on the OHCHR's database of business enterprises involved in illegal Israeli settlements, linked here: https://www.ohchr.org/sites/default/files/documents/hrbodies/hrcouncil/sessions-regular/session31/database-hrc3136/23-06-30-Update-israeli-settlement-opt-database-hrc3136.pdf Hewlett-Packard Company Siemens</p> <p>In the event that retrieving this information would exceed the limit as set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004, then please answer question 2 first, taking the above list of companies as in priority order. If responding to the OHCHR list is still likely to reach the limit set out, then please give the data about the College's investments in Israeli-domiciled companies in the database.</p> <p>If you are still to invoke Section 12 to withhold information in relation to any of these questions please provide details of how locating, retrieving and extracting this</p>

information would exceed the appropriate limit set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004. Please also be aware of your duty under section 16 (1) of the Act to advise and assist me in narrowing my request to bring it within the appropriate limit.

If you are to invoke Section 43 to withhold information in relation to any of these questions please provide details of the exact FOIA exemption, details of who would be prejudiced by this information, and a public interest test justifying a conclusion with arguments for and against the release of the information.

I am happy to provide any clarifications required to support this request, please be in touch at any time. Thanks very much for your help with this request and I look forward to your response within the next 20 working days.

Yours faithfully,

[REDACTED]

Reply

Dear [REDACTED]

The College replies as follows

As a matter of policy, the College does not invest directly in companies, but uses investment managers on a discretionary basis. The investment managers invest in pooled investments. This means that neither the College, nor its managers, invest in companies directly. The College is therefore unable to answer your questions because it does not hold the information you are asking for.

[REDACTED]
College Secretary

Internal Review

If you are dissatisfied with this reply, you may ask the College to review it, by writing to the Freedom of Information Officer at the following address:

Exeter College,
Turl Street,
Oxford,
OX1 3DP.

Alternatively, you may request a review by e-mailing foi@admin.ox.ac.uk

THE INFORMATION COMMISSIONER

If, after the internal review, you are still dissatisfied, you have the right under FOIA to apply to the Information Commissioner for a decision as to whether your request has been dealt with in accordance with the FOIA. The Information Commissioner's address is:

Information Commissioner
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Tel: 0303 123113