
RE: FOI Request

Freedom of Information - Lady Margaret Hall <foi@lmh.ox.ac.uk>

Tue, Aug 20, 2024 at 9:27 AM

To: 

Cc: Freedom of Information - Lady Margaret Hall <foi@lmh.ox.ac.uk>

Dear Ms. 

With reference to your request for information made under the Freedom of Information Act 2000, regarding investments made by Lady Margaret Hall, Oxford (LMH), the College is able to respond (in **bold**) below, as follows:

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.

The College does not have any direct investments in the companies identified above. Through the College's investments managed by Oxford University Endowment Fund (OUEF), the College owns units in the Oxford Endowment Fund (OEF) which in turn invests in investment groups globally, rather than individual companies. OUEF's manager has informed that the College "does not invest in individual companies and no information is shared with you (i.e. the College) on the companies held in these vehicles. You do not hold this information and are unable to share this. The OEF is a commercial vehicle, and its investments are considered commercially sensitive and confidential. Any information shared with you as a unitholder is subject to the confidentiality terms as set out in the subscription documents and should not be circulated further."

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:

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

Again, the College does not have any direct investments in companies listed above. Through the College's investments managed by Oxford University Endowment Fund (OUEF), the College owns units in the Oxford Endowment Fund (OEF) which in turn invests in investment groups globally, rather than individual companies. OUEF's manager has informed that the College "does not invest in individual companies and no information is shared with you (i.e. the College) on the companies held in these vehicles. You therefore do not hold this information and are unable to share this. The OEF is a commercial vehicle, and its

investments are considered commercially sensitive and confidential. Any information shared with you as a unitholder is subject to the confidentiality terms as set out in the subscription documents and should not be circulated further.”

The College is currently investigating the extent to which its funds, other than in OEF, are invested in companies which may be involved in the activities outlined in question 1 and/or question 2 above.

Trusting this is helpful.

Kind regards

Treasury Officer (Legal, Governance & Compliance)

Lady Margaret Hall, University of Oxford

Norham Gardens, Oxford, OX2 6QA [REDACTED]

Flexible part-time work hours

From: [REDACTED]
Sent: 25 July 2024 22:36
Subject: FOI Request

To whom it may concern,

I'm writing to request information regarding your College's investments under the Freedom of Information Act 2000.

Could you please provide the following information:

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.

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:

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Hewlett-Packard Company

Siemens

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.

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 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,

A solid black rectangular redaction box covering the signature area.