

Re: FOI Request

Fri, Aug 2, 2024 at 1:30 PM

Dear ,

Thanks for your message below.

Nuffield College invests in (i) the Oxford Endowment Fund (OEF) and (ii) Exchange Traded Funds (ETFs) that track indexes in the MSCI ESG Enhanced Focus CTB range. There are also a small number of residual holdings in time-limited private equity funds, each of which is now at or close to the end of its life and none of which to the best of our knowledge invest in the types of companies listed in your message below.

Regarding (i), information about the OEF can be found on the University of Oxford's website and on the website of the fund manager, OUem, which includes information about OUem's approach to sustainability and ESG together with copies of their annual reports. The College does not hold information about the companies invested in by the managers appointed by OUem.

Regarding (ii), information about the MSCI ESG Enhanced Focus CTB indexes methodology can be found in the attached extract from an MSCI document. The College does not itself hold information about the companies held in the ETFs that track these indices. Such information can be found by searching for 'ESG Enhanced' at https://www.ishares.com/uk/individual/en.

All the best,

Nuffield College, Oxford, OX1 1NF



From:

Date: Thursday, 25 July 2024 at 22:35

To:

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: 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

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,

Extract from MSCI ESG Enhanced index methodology.pdf 112K