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**RE: FOI Request**

1 message

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**Freedom of Information** <foi@univ.ox.ac.uk>

Mon, Jul 29, 2024 at 12:14 PM

To:

Dear ,

Thank you for your request. There is some overlap with your query and another we have received, and our response to the latter is visible on the whatdotheyknow site: [https://www.whatdotheyknow.com/request/investments\\_in\\_companies\\_profiti\\_2#incoming-2672569](https://www.whatdotheyknow.com/request/investments_in_companies_profiti_2#incoming-2672569).

We have estimated that searching through Univ's indirect holdings (which is now in the public domain due to our whatdotheyknow response) would greatly exceed the 18 hours or £450 cost limit (at £25/hr) in the ICO legislation. However, we have supplied the details of the holdings as at May 2024 (as per the link above) which will enable you to test whether any of the listed companies feature in the holdings.

While the detail is shared for transparency, we ask that you extend the College the courtesy of prior sight of any representations, adverse or otherwise, that you may propose making informed by the information that is shared.

With best wishes,

University College Freedom of Information

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**From:**   
**Sent:** Thursday, July 25, 2024 10:36 PM  
**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,

