

Chapter 3

Disinvesting from Cluster Munitions Producers

This third chapter answers our second research question:

Who is disinvesting from companies that produce cluster munitions?

- The chapter is divided in three parts:
- The first part, the Hall of Fame, describes financial institutions with a clear and far-reaching policy on cluster munitions.
- The second part, the list of Runners-up, lists financial institutions with a policy that displays several shortcomings.
- Finally, the third part lists countries which took legislative initiatives to ban investment in cluster munitions.

3.1 Hall of Fame: Financial institutions pioneering in disinvestment

3.1.0 Introduction and methodology

As the previous chapter showed, many financial institutions display little responsibility when it comes to cluster munitions. They invest in producers of cluster munitions, despite an international consensus that cluster munitions are controversial and indiscriminate weapons. Some financial institutions either regard investment as a neutral activity or consider ethical decisions to be the government's responsibility. Others shift the responsibility to their clients by referring to ethical savings and/or investment products. This ignores the fact that clients do not always have a clear view on what companies are included in investment funds or what activities these companies are involved in. Moreover, this does not diminish the financial institutions' responsibility.

Cluster munitions are technically incapable of distinguishing civilians from military targets. This makes cluster munitions indiscriminate weapons, conflicting with international humanitarian law. The Convention on Cluster Munitions provides a strong legal basis to ban cluster munitions. In its wake, a growing group of financial institutions has come to accept responsibility and has implemented a clear and far-reaching policy on how to deal with cluster munitions producers. These financial institutions do not consider cluster munitions producers appropriate business partners. They do not condone business relations with cluster munitions producers, regardless of the nature of the business relation and regardless of the activity of the cluster munitions producer they want to invest in. Producing cluster munitions, regardless of their importance in a company's total turnover makes a company a no-go business partner for these investors. We welcome these initiatives and see them as examples for other financial institutions.

We have listed these financial institutions in our Hall of Fame.

- **Selection and research**

To identify financial institutions with a policy on cluster munitions, we researched a variety of sources: NGO reports, screening agency information, financial institutions' reports and websites, worldwide campaigns and other official sources available in the public domain. We were limited to policy statements available in English and/or Dutch and by access to information. The Hall of Fame is far from comprehensive. We believe that the financial institutions listed are only a tip of the iceberg. For this research it was impossible to research the policies of all the financial institutions worldwide however. The Hall of Fame can be seen as an invitation to financial institutions that have a comprehensive policy to ban investment in cluster munitions to provide us with their

policy and to publish it on their website in order for us to include them in either the Runners-up category or the Hall of Fame.

As the investment policy is usually stipulated by the banking group and as a banking group directly or indirectly supervises its subsidiaries, we have researched the policy of the group

We have contacted the financial institutions included in this list before publication to check our research findings and clarify their policy.

Financial institutions in the Hall of Fame must meet the following criteria:

- An investor must be transparent and accountable on its cluster munitions policy. This means that the investor itself has published the policy and/or a summary of it.
- Its policy must exclude investment in cluster munitions producers (recalling past investment and avoiding further investment).
- The policy must have an 'all-in' comprehensive scope:
 - no exception for any types of cluster munitions producers
 - no exception for any type of activities by cluster munitions producers
 - no exception for any type of financing or investment by the investor

We researched investments in the Red Flag companies for each financial institution in the Hall of Fame. This included shareholdings under the 1% threshold. We chose to do so because any involvement at all in a cluster munitions producer, after publication of a policy not to do so, is evidence of poor implementation. When we found involvement of financial institutions in the Hall of Fame, we contacted the company to confront them with our findings. Financial institutions where we found this involvement without a legal reason preventing it from instant withdrawal, can not be part of the Hall of Fame.

- **Results**

Below you will find the research findings on financial institutions with a clear and far-reaching policy to exclude producers of cluster munitions.

We provide the name and the country of origin for each financial institution listed, as well as a brief profile and a summary of its policy.

We list the financial institutions alphabetically within three main categories: ethical banks, government managed financial institutions and mainstream private financial institutions.

ETHICAL BANKS

Ethical banks are usually small, founded to serve as a source of capital for sustainable projects and companies. Sustainable energy, organic food, social projects and cultural activities are examples of sectors in which these banks invest. By their nature, these banks do not get involved in arms production. In addition, they have detailed procedures to avoid investing in ‘unethical industries’ like arms production, etc.

3.1.1 ASN Bank (The Netherlands)

ASN Bank is the largest ethical bank in The Netherlands. Its aim is to promote sustainable society by supporting socially responsible businesses.³⁸⁵

ASN uses absolute exclusion criteria for ‘arms and security’ for all of its investments. This means it excludes companies engaged in or benefiting from war crimes, or the manufacture of or trade in arms. The ASN Bank states that, as a result of this policy, it will refrain from providing any type of funding for or investment in companies that develop, manufacture, distribute or trade in arms. The term “arms” refers to all types of conventional weapons, ammunition, parts, supporting technologies and associated expertise. For a precise definition of “arms”, ASN Bank uses the *Common Military List of the European Union*. This list contains an extensive summary of arms, parts and chemicals as well as ICT products and services. Furthermore, ASN Bank excludes companies that manufacture products that are primarily used in armaments in addition to having a civil application.³⁸⁶

Moreover, ASN Bank will refrain from investing in financial institutions that do not apply the same exclusion criteria or in financial institutions that lack transparency regarding their investments (i.e. when ASN cannot verify their compliance with the exclusion criteria).³⁸⁷

3.1.2 Banca Etica (Italy)

Banca Etica is an Italian co-operative bank that operates exclusively in the field of sustainable and alternative finance. Banca Etica has developed partnerships with institutes and organisations throughout Europe to develop civil economy, ethical finance and fair trade.³⁸⁸

Article 5 of its founding charter states that, “any financial relation with the economic activities that, even in an indirect manner, inhibit the human development and contribute to fundamental human rights violations are anyway excluded.”³⁸⁹ According to Banca Etica, this article prohibits all involvement with the arms industry.³⁹⁰

3.1.3 Triodos Bank (The Netherlands)

Triodos Bank is an ethical bank active operating in the Netherlands, Belgium, the United Kingdom, Spain, and Germany. It had a total balance sheet of € 2.363 million in 2008.³⁹¹

The bank bars companies that produce or sell weapons, specifically designed components for weapons and weapons-related services from financing and investment. These include conventional and non-conventional weapons.³⁹²

Moreover, Triodos has a strict policy on banks: they are expected to apply zero tolerance to shareholdings, bonds and loans related to companies involved in producing cluster bombs (one exception covers passively managed funds directly related to indexes).³⁹³

Financial institutions often use bank secrecy as defence when accused of not being transparent. The ethical banks listed here show that banks can be transparent.

TRANSPARENCY

A salient characteristic shared by all three of these ethical banks is their transparency regarding their investments:

- ASN Bank's annual report includes the investment criteria and the names of the companies that it invested in over the past year. Moreover, the bank publishes the investment universe for each of its investment funds on its website, which includes a short description for each company in the portfolio.
- Banca Etica is completely transparent about its financing operations: its website contains a list of all loans approved during the previous year.
- Triodos Belgium, Spain and Britain are transparent about companies receiving credit. Triodos offers complete insight into its funds' investment universe as well.

When they select financing and investment recipients, financial institutions determine which businesses they will support. Because most other financial institutions do not make their choices public, it's impossible for clients to know what their money supports. In fact, everyone, not just customers, has the right to know about these important choices, their impact and their risks. A bank that publishes the names of the companies that it has approved or refused financing/investment gives observers a tool to ascertain the type of businesses with which a financial institution is involved and to verify whether a financial institution complies with its own policy. It allows each customer, political leader and shareholder to gather information to determine whether a financial institution assumes ethical responsibilities and fulfils its promises.

Finally, a published list of shareholdings is a public appreciation of the selected companies. Similarly, the publication of exclusion lists - lists of companies not selected - is a way of stating that these companies do not meet the criteria used.

GOVERNMENT-MANAGED PENSION FUNDS

A pension fund is a pool of assets forming an independent legal entity. Pension plan contributions buy rights to pension plan benefits. National governments manage some of these pension funds. That makes the national governments responsible for these funds' investment strategy and for management of its portfolio.³⁹⁴

3.1.4 National Pensions Reserve Fund (Ireland)^x

The Irish National Pension Reserve Fund (NPRF) was established to meet as much as possible of the cost of social welfare and public service pensions from 2025 onwards, when the cost is expected to increase due to the ageing of the population. The National Pension Reserve Fund Commission manages the fund. The Minister of Finance appoints the commission's members.³⁹⁵

^x Our research on financial institutions investing in cluster munitions producers revealed an NPRF investment in Textron. In December 2008, NPRF owned 0.002% of Textron shares, with a value of US\$0.06 million. (National Pensions Reserve Fund Commission, Annual Report and Financial Statements 2008, Dublin, 30 June 2009, p 66, available at <http://www.nprf.ie/Publications/AnnualReport2008.pdf>, last check 19 September 2009.) On 21 September 2009, NPRF confirmed in a written response to Netwerk Vlaanderen that it divested Textron after NPRF set a new policy based on the 2008 Cluster Munitions and Anti-Personnel Mines Act passed on 2 December 2008.

On 3 March 2008, Ireland's NPRF announced it would withdraw € 27 million from investments in six international companies involved in producing cluster munitions. This announcement was made following a specific request from the government to withdraw from companies involved in the manufacture of cluster munitions. The Irish government was, at the time, seeking to conclude a legally binding convention to prohibit cluster munitions; the CCM. The fund withdrew from all (Raytheon, General Dynamics, Lockheed Martin, Alliant Techsystems and L-3 Communications) but one (Thales) of the companies, since the Irish NPRF did not consider the latter was a manufacturer of cluster munitions.³⁹⁶

On 2 December 2008, Ireland approved the 2008 Cluster Munitions and Anti-Personnel Mines Act. This act is the foundation for the Irish NPRF policy. After the act was passed, the Irish NPRF disinvested from seven companies and excluded from consideration four others in which it had not yet invested. These companies were excluded because of their involvement in manufacturing cluster munitions or anti-personnel mines.³⁹⁷

3.1.5 Norwegian Pension Fund (Norway)

In Norway, the Government Pension Fund – Global was set up to manage all the state's oil revenues. Large petroleum revenues have resulted in substantial financial assets in the government pension fund. The fund's purpose is to facilitate government savings needed to meet the rapid rise in public pension expenditures in the coming years, and to support a long-term management of petroleum revenues. In 2008, the fund had a market value of NOK 2,363 billion (€ 275.53 billion³⁹⁸).³⁹⁹

In 2004, the Norwegian Government adopted ethical guidelines for the government pension fund. Point 4.4 states: "The Council shall issue recommendations on negative screening of companies that:

- produce weapons that through their normal use violate fundamental humanitarian principles; or
- sell weapons or military materiel to states mentioned in Clause 3.2 of the supplementary guidelines for the management of the Fund."⁴⁰⁰

The Ministry of Finance has excluded several producers of cluster munitions since the ethical guidelines came into force, based on recommendations of the Council on Ethics for the Government Pension Fund – Global. The recommendation of 16 June 2005 explains the interpretation of the guidelines regarding cluster weapons. It defines cluster weapons as weapons that violate the fundamental humanitarian principle, by breaching the distinction between military and civilian goals.⁴⁰¹

The Council on Ethics has taken the 2008 International Convention to Ban Cluster Munitions' technical definition of what constitutes cluster munitions as the basis for its exclusion recommendations.⁴⁰²

The following companies have been excluded from the Norwegian Pension Funds portfolio since 2005 because they manufactured what were thought to be key components for cluster bombs: Alliant Techsystems, General Dynamics, L3 Communications, Lockheed Martin, Raytheon, Thales, Poongsan, Hanwha and Textron.⁴⁰³ In September 2009, Thales' exclusion was reversed because it was no longer involved in cluster munitions.⁴⁰⁴

The Norwegian Pension Fund gains extra credit for its full transparency on the issue. It publishes the Ethical Council's recommendations and issues press releases publicising government decisions.

3.1.6 New Zealand Superannuation Fund (New Zealand)

The New Zealand Superannuation Fund accumulates and invests state contributions. It was created in 2001 to provide partial coverage for the future cost of funding New Zealand superannuation payments. Like many countries around the world, New Zealand has an ageing population, with the number of retired people expected to double by 2050. Accordingly, the cost of providing New Zealand superannuation is also expected to double in this period. Guardians appointed by the Governor General on the recommendation of the Minister of Finance manage the fund.⁴⁰⁵

The Guardians established a responsible investment framework that includes guidelines based on international conventions, New Zealand law and relevant Crown actions. As is disclosed on their website, the Guardians have a strong preference to engage with companies with the hope that their behaviour will improve. Nevertheless, the Guardians decided in December 2008 to disinvest from companies involved in cluster bomb production. The CCM and the New Zealand Government's lead in the process, combined with the fact that it was unlikely the companies could be persuaded to stop manufacturing, convinced the Guardians it was best to exclude them.

On 30 June 2007, prior to the decision to disinvest, the fund held investments totalling more than € 10 million in companies that an external screening agency has since identified as being potentially involved, in some way, in the manufacture of cluster munitions. In March 2008, the Guardians decided to develop an engagement, disinvestment and exclusion plan related to companies involved in the manufacture of cluster munitions.⁴⁰⁶ The Guardians decided to exclude these companies following New Zealand's signing of the Cluster Munitions Convention on 3 December 2008.⁴⁰⁷

The fund has published on its website a list of companies excluded because of their involvement in the production of cluster munitions. This list is regularly reviewed and updated with information from external screening agencies. The list includes Alliant Techsystems, Goodrich Corporation, General Dynamics, Hanwha, Honeywell International, L-3 Communications, Lockheed Martin, Northrop Grumman, Poongsan Corporation, Raytheon, Singapore Technologies Engineering and Textron Systems.⁴⁰⁸

3.1.7 Swedish Pension Funds AP 1-4 (Sweden)

AP 1 – 4 are four of the seven state-owned pension funds in Sweden. Sweden's pension system has two tiers: five 'buffer'-funds and a premium pension system. The five 'buffer' funds (AP 1 – 4 and AP 6) work as a pay-as-you-go system in which pension contributions are used to pay current income pension benefits. Because ageing baby-boomers will increase demands on the pension system, these buffer funds should provide spare capital if state pension funds payments exceed tax revenues.⁴⁰⁹

On 1 January 2007, a joint ethical committee, the Ethical Council, was established for the National Swedish Pension Funds. This committee focuses on monitoring and analysing the portfolio holdings of the first to fourth AP Funds, to ensure that portfolio companies are not party to crimes in contravention of international conventions to which Sweden is a signatory.⁴¹⁰

As a result of the Oslo Process, in 2008 the Ethical Council ordered a screening of the companies suspected of involvement in cluster munitions. The screening identified nine companies that manufacture and/or market either entire cluster munitions or special components. The Council recommended that these companies be excluded from the four funds' investment universe. All four funds later shed these holdings. Aside from the nine excluded companies, the Ethical Council has an additional seven under watch.⁴¹¹

The excluded companies, named in a press release, are: Alliant Techsystems, GenCorp, General Dynamics, Hanwha Corporation, L-3 Communications, Lockheed Martin, Poongsan, Raytheon and Textron.⁴¹²

3.1.8 Swedish Pension Fund AP7 (Sweden)

AP7 is one of seven state-owned pension funds in Sweden. As stated above, Sweden's pension system has two tiers: a pay-as-you-go component and a premium pension system in which pension disbursements are based on individual savings invested in funds managed by the Premium Pension Authority (PPM). The employees themselves may choose among the PPM funds, how and who they want to manage their pension capital. In the absence of an active choice, the Seventh AP Fund manages the pension capital.⁴¹³

In June 2008, AP7 announced that it would disinvest from companies involved in cluster munitions and nuclear weapons.⁴¹⁴ No direct investments will be made in companies that are considered to participate in the development and/or production of cluster munitions.

AP7 listed the excluded companies in its annual report. The companies excluded because of their involvement in cluster munitions and/or nuclear weapons¹¹ in 2008 are: BAE Systems, Boeing, Daimler AG, EADS, Finmeccanica, General Dynamics Corp., Goodrich, Hanwha, Honeywell International Incorporation, IHI, Lockheed Martin Corp., McDermott International, Northrop Grumman Corp., Poongsan, Raytheon, Rolls Royce Group, Safran and Toshiba Corp.⁴¹⁵

GOVERNMENT-MANAGED FINANCIAL INSTITUTIONS

The government-managed pension funds listed above are examples of governmental best practices. These countries take their strong disapproval of cluster munitions seriously and act accordingly by not investing government-managed pension money in producers of cluster munitions.

The 2008-2009 financial crisis and the following government bailout of banks have changed the financial landscape. Many banks now have government shareholders. This creates a new situation with opportunities for governments to make financial institutions abide by international conventions the government has signed. Governments can use their position as a shareholder to change banks' policies on cluster munitions to ensure none of the banks' money is invested in producers of cluster munitions.

MAINSTREAM FINANCIAL INSTITUTIONS (private)

3.1.9 ABP (The Netherlands)

ABP is the pension fund for employers and employees working in the Dutch Government and the educational sector. It is the world's second largest pension fund. It provides income security in cases of disability, death and retirement, based on the principles of solidarity and non-profit.⁴¹⁶

In March 2007, after the documentary 'The Cluster Bomb Feeling' drew attention to the fact that several major pension funds had invested in companies involved in the production of antipersonnel landmines and cluster bombs, ABP decided to exclude such companies from its portfolio.⁴¹⁷ All shares and bonds in them were sold within one month of this decision.

Its 2007 responsible investment policy review explained this commitment: "ABP does not invest in companies that are directly involved in the production of antipersonnel landmines, cluster bombs, and chemical or biological weapons. Direct involvement covers companies which produce a complete weapon or the greater part of it or produce munitions-related key components of the weapon, such as sub-munitions, fuses and warheads."⁴¹⁸

ABP has drawn up a list of companies to be excluded from investment. This black list, updated in 2008, contains the following companies: Aerostar, Alliant Techsystems, Gencrop, General Dynamics, Goodrich Corporation, Hanwha, Larsen & Toubro Ltd., L-3 Communications, Lockheed Martin, Magellan Aerospace, Poongsan, Raytheon, Rheinmetall, Singapore Technologies Engineering, Textron, Thales and Tata Power Ltd.⁴¹⁹

^{x1} The annual report did not specify which companies were excluded for cluster munitions and which for nuclear weapons.

3.1.10 Ethias (Belgium)

Ethias is a Belgian banking and insurance company. It is the third largest insurance company of Belgium, with a market share of 12.9%.⁴²⁰

Ethias Bank uses a deontological code that forbids giving credit to companies involved in the production of or trade in weapons. Moreover, its asset management is restricted to government bonds in the euro-zone. Since 2009, a screening agency, Forum Ethibel, has audited Ethias' entire balance and investment universe to verify its conformity with its mission and codes.⁴²¹

Ethias Insurance applies an investment code to all the financial reserves under its management. This code excludes producers of cluster munitions. Ethias Insurance has a black list of 11 banned companies based on the companies' involvement in anti-personnel mines, weapons with depleted uranium and cluster bombs. The excluded companies are: Thales, Singapore Engineering Technologies, BAE Systems, EADS, Lockheed Martin, Raytheon, ATK, Forges de Zeebrugge, Rheinmetall AG, Phongsan America Inc. and AviChina.⁴²²

3.1.11 Folksam (Sweden)

Folksam is a Swedish mutual insurance company that offers a wide variety of insurance, savings and loan products. It is one of the largest Swedish investment managers.⁴²³

In 2008, Folksam responded to the CCM by selling its interest in companies that produce or sell cluster munitions. Folksam's policy applies to all in-house products.⁴²⁴

3.1.12 PGGM (The Netherlands)

PGGM is a co-operative organisation providing income protection for everyone in the healthcare and social work sectors. PGGM manages the assets of pension funds. PGGM's largest client is *Pensioenfonds Zorg en Welzijn* (PFZW), whose pension assets are in the range of € 69 billion.^{xii} PFZW sets the policy. PGGM manages its assets and administers its pension scheme.⁴²⁵

PGGM applies a responsible investment policy that excludes controversial weapons. The exclusion policy states that PGGM does not invest on behalf of their clients in companies that have a substantial involvement in the production or trading of controversial weapons, such as cluster bombs. Substantial involvement means that a company produces or trades in end products or components that are essential for the operation of weapons. PGGM adopted the Convention on Cluster Munitions' definition of cluster bombs once the convention took effect. Before that, it relied on The Red Cross' guidelines.⁴²⁶

It published a list of excluded companies on its website. The black list contains the following companies based on involvement in cluster munitions: Aerostar, Cobham, Goodrich Corporation, Hanwha Corporation, Kaman, L3 Communications, Lockheed Martin, Magellan Aerospace, Poonsang, Raytheon, Rheinmetall, Saab AB, Singapore Technologies, Textron and Thales.⁴²⁷

PGGM wrote in its 2008 annual report that it could assure that 98% of its total portfolio complied with the exclusions policy. PGGM writes: "That does not mean that the other 2% do violate it, but we cannot guarantee that no investments will be made which contravene the provisions of the policy or the Exclusions List. This requires further research."⁴²⁸ Further information from PGGM shows that the 2% is made up of hedge funds. It is difficult right now to assure that these involve no breaches. Still, PGGM is working on a way to guarantee this also for hedge funds.⁴²⁹

^{xii} Until recently, PGGM and PFZW formed a single entity. PGGM then became into a commercial organization. (PGGM's written response to Netwerk Vlaanderen on 29 July 2009)

3.1.13 Philips Pension Fund (The Netherlands)

The € 13 billion Philips Pension Fund is one of the largest corporate plans in The Netherlands. It offers pension services to the employees of electronics company Philips.⁴³⁰

In 2008, the Philips fund started to integrate environmental, social and governance (ESG) criteria across its total investment. This implies excluding companies linked to the production of cluster weapons. The fund uses a list of cluster munitions producers to implement this policy. This list is not public.⁴³¹

3.1.14 Storebrand Group (Norway)

Storebrand Group is a leading player on the Nordic market for pensions, life and health insurance, banking and asset management.⁴³²

Storebrand group excludes producers of cluster munitions from all of their investment portfolios. The policy was updated in May 2009 to reflect the Convention on Cluster Munitions. All funds managed by Storebrand are covered by the policy.

It continually monitors the nearly 3000 companies in its investment universe to exclude unacceptable business practices. In the second quarter of 2009, Storebrand excluded six companies involved in cluster munitions from its investment universe. Storebrand does not make the list of excluded companies public.^{433 viii}

Black lists

Several financial institutions have listed the companies they exclude in a black list. Not all of them list the same companies, which is logical because different financial institutions start from different points when listing companies. Some start from their own investment universe and exclude the cluster munitions producers from that universe (e.g. Norwegian Pension Fund). Others start from companies listed in a certain index (DACS, MCSI, Dow Jones, Bel 20, etc.), or only look at American or European companies. This explains differences between the several lists.

Having a black list makes it far easier for a financial institution to implement its policy. Moreover, making it public blames the companies who keep on producing these indiscriminate weapons and can help to end production.

^{xiii} In our research for financial links of financial institutions listed in the Hall of Fame with the companies of our Red Flag list under the 1% threshold, we found three investments made by Storebrand: In March 2009, Storebrand owned or managed shares of L-3 Communications, Lockheed Martin and Textron, valued at respectively US\$ 0,17; US\$ 0,46 and US\$ 0,03 million. (Thomson ONE Database, visited July 2009, www.thomsonone.com). Storebrand informed us that these findings are due to a legal question: When SPP mutual funds were transferred from Handelsbanken to Storebrand in 2009, the fund mandates had to be approved by the Swedish government (Finansinspektionen). For certain SPP funds, such approval has not yet been given. Storebrand has confirmed that a meeting will be scheduled in the near future between SPP and Finansinspektionen to discuss this issue specifically. As soon as Finansinspektionen gives their approval, portfolios will be adjusted to Storebrand's policy, which means the exclusion of cluster munitions producers. (Written answer by Storebrand to Netwerk Vlaanderen on 8 October 2009). Therefore, Storebrand is still listed in the Hall of Fame. The next update of our research will be in December 2009. If the above mentioned investments will not be ended by that time, Storebrand will no longer be listed in the Hall of Fame, but in the Runners-up category.

3.2 Runners-up Financial Institutions

3.2.0 Introduction and methodology

The second part of this chapter contains a list of runners-up financial institutions. These have also made significant efforts to ban cluster munitions from their investment portfolio. Still, their policies are not comprehensive enough for inclusion in our Hall of Fame. They have a policy, but loopholes still permit financing of cluster munitions. It is important to note that the Runners-up category is a diverse category and the scope of the policies differs greatly. In some cases a policy does not apply to all company's activities, or does not cover all the financial institutions' services. Other financial institutions have a far-reaching policy, but fail to implement it properly. These financial institutions still have financial links with cluster munitions producers, although their policies state that they don't. The Runners-up category is far from comprehensive. We believe that the financial institutions listed are only a tip of the iceberg. For this research it was impossible to research the policies of all the financial institutions worldwide however. The Runners-up category can be seen as an invitation to financial institutions that have a comprehensive policy to ban investment in cluster munitions to provide us with their policy and to publish it on their website in order for us to include them in either the Runners-up category or the Hall of Fame.

We commend the financial institutions in the Runners-up category for their policies, but take the liberty of pointing out a few shortcomings.

- **Research**

Financial institutions have to meet the following criteria to be considered a runner-up:

- An investor must be transparent and accountable on its cluster munitions policy. This means that the investor itself has published the policy and/or a summary of the policy.
- The policy must exclude investment in cluster munitions producers (recalling past investment and restraining from further investment).

The Runners-up category lists financial institutions which meet the two criteria above. They differ from the Hall of Fame however, because they do not meet the following criteria:

- The policy must have an 'all-in' comprehensive scope:
 - no exceptions for any types of cluster munitions producers,
 - no exceptions for any type of activities by cluster munitions producers,
 - no exceptions for any type of financing or investment by the investor,
 - no breaches of this all-in comprehensive policy after the policy's publication or implementation date.

- **Results**

To identify financial institutions with a policy on cluster munitions, we researched a variety of sources such as NGO reports, screening agency information, financial institutions' reports and websites, worldwide campaigns and other public sources. We were limited to policy statements available in English and/or Dutch and by access to information. This following list is therefore by no mean exhaustive. We welcome additions from those able to provide them.

As the investment policy is usually stipulated by the banking group and as a banking group directly or indirectly supervises its subsidiaries, we have researched the policy of the group.

Below you will find the research findings on financial institutions with a policy to exclude producers of cluster munitions. However, either this policy is not sufficiently comprehensive or else it is not fully implemented. For this reason, these institutions did not make it into our Hall of Fame.

We have contacted all financial institutions included in this list to check our research findings and clarify their policy.

We provide the name and the country of origin for each financial institution as well as a brief profile and a summary of its policy.

Next, we explain what a financial institution must do to gain admission into the Hall of Fame. In other words, we point out the shortcomings of the institution's policy in a positive way, indicating how it can adjust its policy to make this policy more effective and far-reaching.

The financial institutions are listed in alphabetical order.

The following financial institutions all have policies with certain shortcomings. The policy is there, but its scope is too limited. The most common problems are:

The policy only takes its own involvement into account, not that of third parties

Several banks have a policy that only takes into account their own involvement, meaning the policy only covers the money a bank invest on its own behalf. None of the money invested for clients is covered. This is a major flaw because most of the money that a financial institution invests belongs to third parties. Banks argue that they do not want to make ethical choices on behalf of their client. This is a weak argument, considering that most banks are not transparent about the companies they invest in. When a client is not informed about the companies a bank invests in, he/she cannot make a choice. Moreover, it is inconsistent for a financial institution to profit from selling investments in cluster munitions producers to others, while not wanting to invest its own funds in cluster munitions producers.

The policy does not apply to project finance for civil purpose

There is no way to prevent a company from (legally) reallocating capital within a group. Adding stipulations to a general corporate loan prohibiting the company's use of the lent funds for producing cluster munitions, or restricting the financing of a company to civilian projects, does not prevent this money from freeing other funds for use in the production of cluster munitions.

Exception for funds following an index

Most financial institutions make an exception for funds following an index. During our research and the conversations we had with financial institutions about this issue, many financial institutions pointed out that it is simply impossible to exclude producers from cluster munitions from funds following an index. Still, some financial institutions do have a policy that includes index funds. Danske Bank, for example, makes sure to exclude companies producing cluster munitions from the index they track. Storebrand does the same, as well as KBC. KBC makes an exception for the index funds for institutional investors however. These examples have convinced us that it is possible to exclude producing companies from funds following an index. Although it might be difficult, and for sure more time and/or money consuming, we feel that if it is possible it should be done. We invite financial institutions that see no possibility to meet this criteria to show clear evidence why this is not possible in their case. Until that time, we have chosen to list financial institutions that make an exception for funds following an index in the Runners-up category, and not in the Hall of Fame.

3.2.1 AXA (France)

AXA is a French-based group providing banking, insurance and investment services to 50 million customers worldwide. AXA's business focuses exclusively on insurance and asset management and does not provide corporate credits and loans. AXA Bank Europe coordinates AXA's banking activities. These cater only to the retail market (retail banking products as well as insurance policies).⁴³⁴

In July 2007, AXA decided to begin disinvesting its own investment from companies that produce cluster bombs. This included investment by the group's general account insurance assets. Moreover, AXA Investment Managers (AXA's wholly-owned asset management subsidiary) decided to divest holdings in companies that produce or sell cluster bombs from the retail mutual funds (non-index based) it manages.

AXA uses an unpublished list of cluster bombs manufacturers to implement the disinvestment policy.⁴³⁵

How to gain a place in the Hall of Fame?

Because AXA does not provide corporate credits and loans, only its insurance and investment activities are taken into account.

To be listed in the Hall of Fame, AXA would have to extend its policy to all its products, meaning the assets that other AXA group asset managers manage on behalf of third parties, index-based funds, and the funds that AXA group investment managers manage for institutional investors. Right now, it covers only the investment of AXA group's general account insurance assets, and retail mutual funds (not-index based) that AXA Investment managers manage.

3.2.2 BNP Paribas (France)

BNP Paribas is France's biggest bank with operations in over 85 countries. In terms of market capitalization, it is the world's 14th largest bank.⁴³⁶

After the CCM opened for signature, BNP Paribas adopted a restrictive policy toward these weapons. The group decided not to invest on its own behalf in the capital of companies producing cluster munitions. The group decided to disengage or divest its actively managed mutual funds connected with companies known to specialise in cluster bombs production.

How to gain a place in the Hall of Fame?

According to BNP Paribas' CSR Delegation, the bank is currently revising its policy on cluster bombs. A working group is appointed with other principal players from the French financial sector. One of the goals is to appoint an independent expert to list all companies directly involved. Since it is not clear when this new policy will be voted and/or adopted, we still comment on the current policy. These are the current shortcomings to be improved in order to be listed in the Hall of Fame:

- To be included in the Hall of Fame, BNP Paribas will have to make its policy more transparent. Several aspects of the current policy are unclear: does the policy cover loans granted by BNP Paribas? What is the meaning of 'companies known as specialising in cluster bombs production'? Does this mean not all companies producing cluster munitions are excluded? BNP did not respond to the above questions about its policy yet, and we welcome any comments and/or clarification from their side for our update.
- To be listed in the Hall of Fame, BNP Paribas would have to extend its policy to all its products. This means it would have to include all investments made on behalf of clients, including private banking services. BNP Paribas' current policy only covers investments on its own behalf and actively managed mutual funds.

3.2.3 Co-operative Financial Services (United Kingdom)

Co-operative Financial Services is part of the Co-operative Group, the UK's largest consumer co-operative. Co-operative Financial Services is a group of businesses that includes Co-operative Insurance, Co-operative Bank and Co-operative Investments. Co-operative Bank offers a range of financial products, from current accounts, savings accounts, credit cards and loans. Co-operative Insurance offers a variety of insurance products and Co-operative Investments products including unit trusts, investment bonds and pensions.⁴³⁹

Co-operative Bank has an ethical policy which it updates regularly to reflect its customers' view. The last revision took place in 2009. One of the new statements made was on cluster munitions: "We will not finance the manufacture or transfer of indiscriminate weapons, e.g. cluster bombs and depleted uranium munitions."⁴⁴⁰ Specifically, it means the group will not finance any company that manufactures, sells or directly exports cluster munitions or that exports strategic parts or services for cluster munitions.⁴⁴¹

To put this into practice, all business customers are required to complete an ethical policy questionnaire. The bank's ethical policy unit reviews the business application against the policy statements and decides whether the bank can offer business banking facilities to the customer.⁴⁴²

Co-operative Insurance and Investments use an ethical engagement policy, which means it will invest in most companies but that it will seek to use their influence as a shareholder to try and improve the companies' ethical performance. It does not mean it will refuse to invest in certain business activities.⁴⁴³

How to gain a place in the Hall of Fame?

Co-operative Bank has a good policy on cluster munitions. However, when we look at the Co-operative Financial Services group's policy, we see that it does not extend far enough to be listed in the Hall of Fame. To be listed:

- Co-operative Financial Services should extend the bank's policy to the group's insurance and investment activities. Its engagement policy does not extend far enough because an attempt to influence a bank's policy without threatening to disinvest lacks muscle.

3.2.4 Crédit Agricole (France)

Crédit Agricole is the number one retail bank in France and the largest retail bank in Europe. Crédit Agricole group provides retail banking services, specialised financial services, asset management, insurance, private banking and corporate and investment banking to 5 million customers in more than 20 countries. It manages assets totalling € 735 billion.⁴⁴⁴

Crédit Agricole Asset Management Group, Crédit Agricole's largest asset manager, has excluded companies producing cluster munitions from all of its active investment mutual funds. Also Predica, which provides life insurances, has done the same.

Calyon, Crédit Agricole's corporate and investment-banking arm, has excluded cluster bombs from its financing activities.⁴⁴⁵

In 2009, Crédit Agricole adopted a new global weapons policy, but has not yet published it.⁴⁴⁶

How to gain a place in the Hall of Fame?

The current published policy contains several loopholes. We hope that the new policy will have addressed these shortcomings. Its publication has been promised for early 2010.

As the new Crédit Agricole policy has been voted, we don't find it appropriate to comment on the old policy. Since it is not yet public, however, we can't comment on the new policy either. We encourage Credit Agricole to publish their new policy as soon as possible.

3.2.5 Danske Bank (Denmark)

Measured by total assets, the Danske Bank Group is the largest financial enterprise in Denmark and one of the largest in the Nordic region. The Group offers banking, insurance, mortgage finance and asset management services to Danish and international customers.⁴⁴⁷

Danske Bank implemented a Socially Responsible Investment (SRI) policy for investing customer funds and the group's own strategic portfolio of securities. The SRI policy is based on several internationally recognised norms, one of them being the Convention on Cluster Munitions. There are three steps in the investment procedure. First, the investment portfolio is screened against internationally recognised norms and principles. SRI Advisors, Ethix, screens the portfolios regularly. Second, if a company violates the norm, Danske Bank engages in a dialogue with the company to determine whether the company intends to change its behaviour. Depending on the result, the third step is to sell or retain the investment.⁴⁴⁸

Currently, the bank is in dialogue with 22 companies and has excluded 16 companies, 11 of which because of involvement in cluster munitions: Aerostar S. A., Aerotech S. A., ATK, General Dynamics, Hanwha, L-3 Communications, Lockheed Martin, Poongsan, Singapore Technologies and Textron.⁴⁴⁹

How to gain a place in the Hall of Fame?

Danske Bank excludes 11 companies involved in cluster munitions and publishes their names on its website. Unfortunately, the SRI policy only covers some of the bank's activities.

- To be listed in the Hall of Fame, Danske Bank must extend its policy to all the bank's financial products. It currently covers only asset management, not the credit activities of the bank. Moreover, there are several exceptions within asset management: the policy does not cover funds-of-funds, structured products, individual securities or derivatives. This makes the policy much lighter than it could be.

3.2.6 Dexia Bank (Belgium)

Dexia is a European bank. It ranks among the three top banks in Belgium and Luxembourg and holds a strong position in Turkey. It also operates in Slovakia. The bank offers a wide range of retail, commercial and private banking services as well as insurance products to more than six million customers.⁴⁵⁰

Since the Belgian Act of 20 March 2007, forbidding investment in cluster munitions producers, Dexia has based its policy on the conditions stipulated in the Act. Dexia excludes companies of which the involvement is certain and known in the sale, manufacture, use or possession of cluster munitions from all its banking and insurance activities.⁴⁵¹

How to gain a place in the Hall of Fame?

Dexia's policy is based on the Belgian law of 20 March 2007. It has thus adopted the two exceptions present in the law. Eliminating those exemptions would get Dexia into the Hall of Fame:

- Its policy should apply to all investments, including index-funds.
- Its policy should apply to all of a company's activities, including project finance for civil purposes.

3.2.7 Fortis Bank Nederland (The Netherlands)

Fortis Bank Nederland provides financial services to individuals, businesses and institutions in The Netherlands and abroad. The onset of banking crisis in October 2008 led to the Dutch Government's acquisition of Fortis Group's Dutch banking and insurance activities. The banking activities now fall under the auspices of Fortis Bank Nederland N.V. This bank, no longer part of the listed company Fortis, is in the early stages of integration with ABN AMRO. ASR Verzekeringen has taken over the Insurance activities. The Belgian state acquired the remaining banking activities and transferred 75% of them to BNP Paribas, resulting in BNP Paribas Fortis.⁴⁵²

The Fortis Group's 2008 Defence Industry Policy, recently rebranded 'Fortis Bank Nederland Defence Industry Policy', states that Fortis does not want to be involved in financing or investing in the production, trade or any other activity related to cluster or other controversial weapons. This includes companies involved in the production of cluster munitions.⁴⁵³

How to gain a place in the Hall of Fame?

Fortis Bank Nederland's Defence Industry Policy unambiguously addresses several specific issues including producers of key components and subsidiaries. Still, the bank needs to do the following to be listed in the Hall of Fame:

- Its policy should apply to all Fortis banking activities. The current policy exempts investments on behalf of clients.

3.2.8 ING (The Netherlands)

ING Group is a global financial service company, operating in the fields of banking, insurance and asset management and active in some 50 countries spread across five continents. It has a market value of € 14.8 billion. Its market capitalisation makes it the 23rd largest European financial institution.⁴⁵⁴

ING has adopted on 9 September 2009 a new, more comprehensive, policy on controversial weapons. For cluster munitions, the policy states that ING will in no way engage with companies directly involved in cluster munitions. This means that, as of 9 September 2009, any involvement by a company in these kinds of weapons results in exclusion. The policy applies to all ING business activities, amongst which ING's commercial banking services, ING proprietary assets and its own funds, investment products and services. By the end of 2009, all ING managed funds worldwide should be clean of cluster munitions producers.

ING is planning to publish the list of companies excluded from its financing and investment activities. Currently, 20 companies have been excluded for their involvement in cluster munitions, but this list is not public yet.⁴⁵⁵

How to gain a place in the Hall of Fame?

We welcome the new ING policy, which addresses several shortcomings in the old policy and broadens its scope. Still, to be listed in the Hall of Fame, the following is needed:

- The policy should include all ING products. This means the policy should also apply to index trackers. Moreover, ING makes an exception for individual clients who explicitly ask for investment in a cluster munitions producer. These requests should be refused.

3.2.9 KBC (Belgium)

KBC is a Belgian integrated banking and insurance group. It is a major financial player in Central and Eastern Europe.⁴⁵⁶

KBC's policy on investment in the weapons industry dates from 2004. Any company involved in the development and manufacture of or trade in controversial weapons systems or their essential components is excluded from all KBC investments. Weapons are considered controversial when there is broad public support for banning them. This refers specifically to biological weapons, anti-personnel mines, cluster bombs and munitions and weapons containing depleted uranium.⁴⁵⁷

The policy covers all KBC's activities including commercial banking, asset management and investment banking. KBC has not only worked out a clear and concrete policy, it has also put this policy into practice strictly and thoroughly. KBC has published a black list of 22 weapon producers. KBC mentions them all as producers of cluster munitions: Aerostar, Alliant Tech Systems, Aselsan, BAE systems, EADS, Finmeccanica, Gencorp, General Dynamics, Hanwha Corporation, Honeywell International, Kaman, L-3 Communications, Lockheed Martin, Magellan Aerospace, Northrop Grumman, Poongsan, Raytheon, Rheinmetall, Singapore Technologies Engineering, Textron, Thales and Zodiac.⁴⁵⁸

What is remarkable about KBC's list is that all companies that have produced cluster munitions in the past are excluded, except when they make it public that they are not producing cluster munitions now nor will they produce cluster munitions in the future. KBC writes the companies in confidence in order to be sure about this.⁴⁵⁹

How to gain a place in the Hall of Fame?

KBC has a clear, far-reaching and transparent policy on weapon systems. Just one further element is needed:

- The policy should cover all investments. KBC now exempts some index-linked investment funds for institutional investors.

3.2.10 Nordea (Sweden)

Nordea offers capital market products, savings products and asset management and life and pension products to approximately 10 million customers in the Nordic region and some new European markets. It is the largest financial services group in the Nordic and Baltic Sea regions.⁴⁶⁰

Following upon Sweden's signature of the CCM in December 2008, Nordea decided in June 2009 to exclude companies involved in producing cluster munitions from its investment universe. Nordea works with the Swedish company Ethix to identify the companies involved in cluster munitions. The following companies are on their exclusion list: Aerostar S.A., Aeroteh S.A., Alliant Techsystems, GenCorp, General Dynamics, Hanwha, L-3 Communications, Lockheed Martin, Poongsan, Singapore Technologies Engineering and Textron.⁴⁶¹

How to gain a place in the Hall of Fame?

Nordea should extend its exclusion policy to all of its products, e.g. its financing activities. The policy currently covers all asset managed by Nordea Asset Management, but it exempts capital market and savings products.

3.2.11 Rabobank (The Netherlands)

Rabobank Group offers a full-range of financial services founded on co-operative principles. The bank serves some 9.5 million clients around the world and is active in 45 countries.⁴⁶²

The bank does not want to be involved in financing or investing with its own funds in any activity related to controversial weapons such as cluster bombs. It may not provide financing for controversial companies and/or for controversial purposes.

Rabobank has a different policy for investments made on behalf of their clients. There, Rabobank first opens discussions with the companies. If the company does not change course within a specific period, the investment customer will be advised to withdraw his/her investment from these companies.⁴⁶³ Still, in October 2009, Robeco, Rabobank's largest Asset Manager, has decided to exclude companies producing controversial weapons such as cluster munitions from the funds it actively manages.⁴⁶⁴

Rabobank uses an unpublished list of cluster bombs manufacturers to implement the divestment policy.

How to gain a place in the Hall of Fame?

- The bank should extend its more stringent policy to all its products, including all investments on behalf of third parties.

3.2.12 Royal Bank of Canada (Canada)

Royal Bank of Canada (RBC) offers personal and commercial banking, insurance, corporate, investment banking and other financial services around the globe. The bank operates in 55 countries, serving over 18 million clients. It is the 11th largest player in the world.⁴⁶⁵

RBC states it will not be involved in the direct financing of companies manufacturing material for cluster bombs.⁴⁶⁶

How to gain a place in the Hall of Fame?

RBC's policy should extend to all its financial activities. The policy now does not apply to asset management and investment banking. It is restricted to credits.

3.2.13 Syntrus Achmea (The Netherlands)

Syntrus Achmea is a Dutch pension company offering pension services (Syntrus Achmea Pension Services) and real estate (Syntrus Achmea Real Estate) and asset management (Syntrus Achmea Asset Management). Syntrus Achmea serves more than 5 million customers and has a total invested capital of more than € 58 billion.⁴⁶⁷

Since January 2008, Syntrus Achmea Asset Management has applied an exclusion policy to companies dealing in controversial weapons. Companies involved in the development, production and maintenance of cluster munitions or companies that have a significant stake in those companies are excluded from all Syntrus Achmea funds and from one external managed fund. These companies are listed in an exclusion list which Syntrus Achmea does not make public.⁴⁶⁸

How to gain a place in the Hall of Fame?

- Syntrus Achmea should apply the exclusion policy on cluster munitions to all its products, e.g. the pension services and the mandates for institutional clients like pension funds.

The policy only covers project financing for cluster munitions

The following three financial institutions only apply their policy to project finance for the production of cluster munitions. This means the policy does not apply to providing money for general corporate purposes. This is a major flaw in the policy because a financial institution cannot guarantee that the financial services it provides to a company will not be used to produce cluster munitions. It is common for weapons producers to finance their cluster munitions facilities from their general corporate capital. We have never yet come across project financing for cluster munitions facilities. So, these banks really are only excluding cluster munitions producers from financial support they never use, which means can continue financing cluster munitions producers as in the past.

There is no way to prevent a company from (legally) reallocating capital within a group. Adding stipulations to a general corporate loan prohibiting the company's use of the lent funds for producing cluster munitions, or restricting the financing of a company to civilian projects, does not prevent this money from freeing other funds for use in the production of cluster munitions.

These financial institutions are not listed as runners-up because they don't exclude producers of cluster munitions, only project finance is covered. They thus don't meet the second criterion to be listed in the Runners-up category. We include them in this special section of the report, to comment on how they can improve their policy to make it to the Runners-up category or even to the Hall of Fame.

BBVA (Spain)

BBVA is an international financing group, offering retail banking, business banking, and investment banking operations. The bank operates in Spain, Latin America and Mexico; measured in assets, it is one of the 25 largest banks in the USA.

Since 2005, the BBVA Group has had a specific rule on defence industry financing. A 2008 review of these “Principles, Criteria and Rules of Procedure for Defence Industry Lending Proposals” banned the group’s involvement in transactions linked to cluster bombs. Specifically, BBVA Group will play no part in financing companies domiciled in a country or territory fitting a list of criteria (e.g. the company’s location country appears on the list of those countries denounced by the UN/EU for human rights violations). Moreover, BBVA Group will have no part in financing operations involving cluster bombs.

How to gain a place in the Hall of Fame?

- The BBVA policy clearly excludes companies based on the country where they are domiciled, but it does not exclude companies according to what they produce. It only excludes transactions linked to cluster bombs. This means that BBVA does not exclude loans for general corporate purposes. To be in the Hall of Fame, BBVA should terminate activities involving companies producing cluster munitions.
- BBVA should extend its ‘no financing’ cluster bombs rule to all its financing activities. It is currently restricted to lending.

Intesa Sanpaolo (Italy)

Intesa Sanpaolo is a banking group resulting from the merger between the two Italian banks Banca Intesa and Sanpaolo IMI. It leads the Italian market and has a strong international presence in Central-Eastern Europe and the Mediterranean basin. It is listed in the top 20 of the world’s largest banks.

Intesa Sanpaolo’s weapons policy states that the group must ban new financial transactions linked to the trading and manufacture of weapons, weapons components and related products.

How to gain a place in the Hall of Fame?

- Intesa Sanpaolo must also exclude producers of cluster munitions from its asset management and investment banking activities. It is currently restricted to loans.
- The bank should not allow exceptions and should end all involvement in cluster munitions producers, unless there are legal constraints. Current policy exempts transactions linked to ongoing inter-governmental agreements and for transactions that were launched or agreed to prior to the time the policy was officially issued. If there are difficulties in transferring operations to another bank, the bank may proceed with the operation. The bank will publish any such exemptions on its website.
- The bank must expand its policy to all a company’s activities. It is currently restricted to activities linked to the trade and manufacture of the weapons, weapons components and related products. This means that only project financing for cluster munitions is banned; general corporate financing is still permitted.

Standard Chartered (United Kingdom)

Standard Chartered is a London-based group, active in more than 70 countries and territories around the globe, making it one of the world’s most international banks.

The group’s policy on defence equipment and armaments states that Standard Chartered will not, under any circumstances, support the manufacture or distribution of any weapons or munitions. This specific policy applies to lending money to fund defence equipment contracts.

How to gain a place in the Hall of Fame?

- Standard Chartered should extend its policy to all its products, e.g. investment banking and asset management.
- The bank should exclude all a company’s activities, not only those related to the manufacture or distribution of cluster munitions.

Financial Institution	Country of origin	Cluster munitions producers							
		Alliant Techsystems ATK (US)	Hanwha (South Korea)	L-3 Communications (US)	Lockheed Martin (US)	Poongsan (South Korea)	Roketsan (Turkey)	Singapore Technologies (Singapore)	Textron (US)
OppenheimerFunds	United States				S				
People's Bank (People's United Bank)	United States	L							
Platinum Grove Asset Management	United States	B							
PPM America	United States								S
Principal Financial Group	United States	S							
Prudential Asset Management	United Kingdom							S	
Pzena Investment Management	United States			S					
Regions Bank	United States	L							
Royal Bank of Scotland	United Kingdom	L			L				
Russell Investment Group	United States					S			
Riyad Bank	Saudi Arabia				L				
Sandelman Partners	United States	B							
Schroder Investment Management	United Kingdom							S	
Scotiabank	Canada				L				L
Shinhan Bank	South Korea		Y						
Shin Heung Securities	South Korea		Y						
SK Securities	South Korea					Y			
Société Générale	France	B							L
Standard Life	United Kingdom	S							
State Street	United States	S		S	L,S	S		S	S
Sumitomo Mitsui Banking Corporation	Japan				L				
SunTrust Bank	United States				L				
Teachers Insurance & Annuity Association	United States		S	S					S
Temasek Holdings	Singapore							S	
T Rowe Price Group	United States	S			S				
UBS	Switzerland				L	S		S	L,X, Y
Union Investment Group	Germany							S	
United Overseas Bank	Singapore	L							
Universal Investment Gesellschaft	Germany							S	
US Bank	United States	L			L				
Vakifbank (Türkiye Vakıflar Bankası)	Turkey						S		
Vanguard Group	United States	B,S	S	S	S			S	S
Vaughan Nelson Investment Management	United States	S							
Veritas Asset Management	United Kingdom							S	

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