

# University College London

Complicit investments: £5,869,808

Based on FOI requests

Yes

This university has an ethical investment policy

Ethical investment policy link: [Read policy](#)

## Investments

Company	Value of investment
Alstom	£1,079,963
<p>Alstom is a French transportation conglomerate. It was included on the United Nations OHCHR's list of business enterprises active in Israel's illegal settlements, based on stolen Palestinian land. <a href="#">WhoProfits</a> report that Alstom is involved in the construction and operation of the Jerusalem Light Rail project, directly as well as through its fully owned subsidiary, Citadis Israel, which is the maintenance contractor for the project. The JLR project contravenes international law since it solidifies Israel's grip on occupied Palestinian land, including East Jerusalem.</p>	
HSBC	£1,453,852
<p>HSBC is a large British bank. Research by <a href="#">War on Want</a> in 2017 found that HSBC invests over £830million in, and provides financial services worth up to £19billion for, companies supplying Israel with weapons and military technology used in its militarised attacks on Palestinians.</p>	
Nice Ltd	£1,121,945
<p>NICE Ltd is a global software and artificial intelligence company. It was formed by members of Unit 8200 which is the largest unit in the Israel Defense Forces, comprising several thousand soldiers. Unit 8200 is Israel's cyber spy unit, tasked with spying on Palestinians living under Israeli apartheid.</p> <p>NICE Ltd's clients have included Israeli arms firm Rafael, and Elta Systems Ltd – both of whom have supplied military technology used in Israel's militarised repression of Palestinians.</p>	
Siemens	£2,214,048

## Company

## Value of investment

According to research group Corporate Occupation “Traffic control systems of the company are installed by its Israeli representative, Orad Group, on apartheid roads (roads on which only Israelis are allowed to travel).”

In addition Siemens Israel is participating in the electrification of the [Tel-Aviv Jerusalem high-speed train \(A1\)](#), which is currently under construction. The A1 train route crosses the Green Line into the occupied Palestinian West Bank in two areas.

The BDS movement has [called for a boycott](#) of Siemens for its role constructing the EuroAsia Interconnector, a submarine electricity cable from Israel via Cyprus to Greece, that will connect apartheid Israel’s electricity grid with that of the EU and enable it to export electricity produced from fossil gas to Europe,

## Other links

### Company

### Nature of link/relationship

BAE Systems	BAE Systems was listed as a sponsor at the Centre for Ethics and Law at UCL until 2021, when the university removed sponsorship information from the website. Subsequent Freedom of Information requests suggest that the Centre for Ethics and Law is now reviewing their sponsorship relationships. This follows campaigning by students and staff.
HSBC	HSBC was a named supporter of the Centre for Ethics and Law at UCL, until the list of sponsors was removed in 2021.
Hebrew University of Jerusalem	The third year of UCL's Hebrew and Jewish Studies with Year Abroad BA programme is spent at the Hebrew University of Jerusalem, an Israeli university partially built on stolen Palestinian land in occupied East Jerusalem.
Thales	EPSRC funded projects with military applications have taken place at UCL. For example, in 2019 a £1,000,000 grant was given to academics working on new sensing and transmission mechanisms for military applications. This project was performed in partnership with IBM, US Army Research Lab and Thales.

University Complicity Database, Palestine Solidarity Campaign, accessed 25 August 2024  
<https://palestinecampaign.org/university-complicity-database/>

# **Policy for Socially Responsible Investment**

## **1. Introduction**

The University believes that, in investing its funds, regard must be made to ethical, social, environmental and governance issues. In pursuing its strategy UCL 2034, the University believes that its investments should reflect its own desire to be sustainable and promote sustainability and that a preference will be given to positive screening to proactively bring about sustainable positive change in the world.

The Council, as Trustees, has the fiduciary duty to maximise returns from the University's investments, whilst ensuring that financially material risks are taken into account. Council has delegated the execution of this duty to its Finance Committee who in turn have appointed an Investment Committee with its specific Terms of Reference. The Investment Committee has recommended to the Finance Committee the appointment of investment managers who will buy, hold and sell investments with a view to maximising returns. It is recognised that long term stability and sustainable investment returns depend on well governed social and environmental systems.

This policy is designed to enable a socially responsible investment approach, whilst minimising any potential negative impact on its investment returns.

## **2. Responsible investment**

The University will adopt investment strategies that seek to minimise and ideally eliminate irresponsible corporate behaviour. Some of the ethical, social, environmental and governance issues which it will focus on include:

- Environmental degradation
- Armament sales to military regimes
- Human rights violations
- Institutionalisation of poverty through discriminatory market practices
- Racial or sexual discrimination
- Tobacco production and manufacture

UCL's values recognise the enduring commitment to promoting environmental sustainability. The United Nations Office for Disaster Risk Reduction (UNISDR) defines environmental degradation as 'the reduction of the capacity of the environment to meet social and ecological objectives, and needs'. Climate change in particular is one of the key challenges. There are various ways in which the University can reflect its environmental concerns in its investment decisions, including seeking investment in low carbon energy assets, actively engaging with companies it invests with in order to influence decision making, tackling irresponsible corporate behaviour, helping to achieve carbon reduction targets and divesting from those companies which are deemed to be in fundamental breach of acceptable standards of ethical and/or

environmental practice. The University has a particular concern in relation to fossil fuels, and will not invest in companies involved in fossil fuel extraction or production.

In recognition of conflict with our medical research objectives, the University will not invest, directly or indirectly (for example via a pooled fund), in the stock or bonds of companies involved in the production and manufacture of tobacco.

The University will publish its portfolio of holdings on an annual basis.

### **3. Investment approach**

The University will use its best endeavours to ensure that it operates its Investment Policy in a way that is consistent with the objectives described above.

The University will appoint investment managers that will be accountable to the University in terms of financial performance and adherence to commitments made on issues of social responsibility and sustainability. They must demonstrate rigorous implementation of the Principles of Responsible Investment supported by the United Nations ([www.unpri.org](http://www.unpri.org)) and preferably be signatories. A report will be required each year from the investment managers demonstrating performance against socially responsible investment criteria.

As an investor, the University has three means of bringing pressure to bear on corporate behaviour: acquisition, divestment and engagement. UCL will instruct its investment managers with the following requirements:

#### *Acquisition*

- The University will require investment managers to incorporate ESG factors into their selection criteria.
- The University will seek to identify and promote low or zero carbon investments where available without detrimental impact to investment risks and returns.

#### *Divestment*

- Where a company in which the University currently holds shares does not respond positively to concerns about its practices and is deemed to be in fundamental breach of acceptable standards of ethical and/or environmental practice, the University will divest itself of shares in that company and require the investment manager to inform the company of its reasons for doing so.
- Investment managers will be instructed to monitor the performance of companies and to bring recommendations for divestment strategies to the Investment Committee for a decision.

#### *Engagement*

- The University will expect investment managers to engage with companies where ESG issues are a concern, provide proxy voting on ESG issues and report to the University on their engagement activities.
- Where the University invests in any company that does not appear to be pursuing sound ethical business practices and/or displaying appropriate environmental responsibility,

the investment managers will seek to persuade that company to operate in a more socially and environmentally responsible manner, both informally and formally (raising issues at Annual General Meeting and exercising its shareholder's right to vote).

#### **4. Policy responsibility**

This policy is approved by Council and implemented, on behalf of Council, by the Finance Committee who in turn delegate this activity to the Investment Committee. Our interpretation of the fiduciary duties is that they are about maximising returns from the investments whilst ensuring that financially material risks, including ESG risks, are taken account of.

#### **5. Review**

The University will review this Policy for Socially Responsible Investment every two years.

Approved by UCL Council 17<sup>th</sup> April 2020