14 May 2021.

To the board of Universities Superannuation Scheme Limited,

We are writing to you as members of the Universities Superannuation Scheme (USS) concerned with the situation in Myanmar. As you are likely aware, since 1 February this year the military in Myanmar have attempted a coup, overturning the landslide victory of the National League for Democracy in the general election held in November 2020, and have governed through brutal, blunt force over the population, a large proportion of which are participating in a widespread civil disobedience movement opposing their rule. At the time of writing, the Assistance Association for Political Prisoners (Burma) have recorded 766 deaths at the hands of the junta’s security forces, 3,614 people charged and arrested for protesting the regime, and a further 1,417 charged but currently evading arrest. In addition, the military have bombed civilians in areas in which Ethnic Armed Organisations operate after renewed clashes with military forces. According to the United Nations Office for the Coordination of Humanitarian Affairs, by the end of April these bombardments had resulted in the internal displacement of over 60,000 people. In this context, we are urging you to act in relation to USS’s public equity holdings to help isolate, and thus escalate financial pressure on, the illegitimate military regime, to support the struggle of the Myanmar people to restore democracy.

On 25 February, the UK government imposed sanctions on senior military figures in Myanmar and subsequently placed sanctions on two key military conglomerates, Myanmar Economic Holdings Limited (MEHL) and Myanmar Economic Corporation (MEC). In accordance with the HM Treasury’s accompanying notice, UK companies, citizens, and institutions are legally obliged to ensure that they are not breaching these financial sanctions. In addition to these legal requirements, a report of the Independent Economists for Myanmar published on 26 April has outlined the extent to which the military junta is dependent upon foreign currency. They also show that restricting the regime’s access to foreign currency will significantly undermine their capacity to maintain their rule. USS currently has holdings in at least 24 companies who have significant investments with the Burmese military. Five of these companies—Daiwa House Industry, Hilton Worldwide Holdings, Kirin Holdings, Pan-Pacific Co. Ltd., and PTT Oil and Retail (PTTOR)—were already in direct relationships with the military prior to 1 February 2021. Kirin Holdings, Pan Pacific

Co. Ltd., and PTTOR all have direct links to either MEHL or MEC. We urge USS to divest from these five companies.

The remaining 19 companies that USS invest in were in relationships with civilian branches of government prior to 1 February 2021 but are now de facto funding the military. These companies are: Chevron Corporation; Daiwa Securities Group; Deutsche Post AG; Eneos Holdings; Eni SPA; IHI Corporation; Japan Exchange Group; JFE Holdings; Kajima Corporation; Kamigumi Corporation; KDDI Corporation; Keppel Corporation; Marubeni Corporation; Mitsubishi Corporation; Mitsui & Co., Ltd; PTT PCL; Royal Dutch Shell PLC; Sumitomo Corp; and Total SE. Of these companies, Royal Dutch Shell PLC is the largest of USS’s holdings, being USS’s 22nd largest public equity holding. As a prominent shareholder, USS should urgently engage with these companies and pressure them to suspend payments to the junta, which they can hold in a trust account until democracy is restored. If a company refuses, then USS should divest.6

The military in Myanmar are guilty of numerous human rights abuses committed before and since the 1 February coup. Companies with long-standing ties to the military are not ethical investments. In the context of the military’s attack on Myanmar’s nascent democracy and subsequent violent repression of democracy activists, continuing to be a shareholder in companies that have maintained their relationships with the country’s military regime is incompatible with USS’s Responsible Investment strategy. In addition, under the Organisation for Economic Co-operation and Development (OECD) Guidelines and the United Nations Guiding Principles on Business and Human Rights (UNGPs) companies whose products or services are directly linked to severe human rights impacts through their business relations—in this case directly with the military regime—are expected to consider disengaging immediately. Most pertinent to USS, the OECD Guidelines and UNGPs also place a responsibility on international investors, including pension funds and their asset managers holding shares in these companies, to use their leverage to convince their investee companies to act responsibly, and to divest from them if they do not.7 With regards to the 19 companies that have continued to operate within the country through relationships with parts of the state now under the control of the military, this is an urgent moment for USS to act as an “engaged shareholder” to effect “positive change at a company level”.8 We look forward to your response on this urgent matter.

Yours sincerely,

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