The Netherlands

Two Financial Institution made an estimated USD$ 621 million available to nuclear weapons producing companies.

Introduction

This document contains country specific information from the 2014 Don’t Bank on the Bomb. It profiles financial institutions with known published policies banning or limiting investment in nuclear weapons producers. It also includes the list of financial institutions that have significant financing relationships with one or more of the nuclear weapons producers identified in the report. Finally, it provides a brief summary of the nuclear weapons related work of each of the identified producers. For more detail, see the full report or go to the [www.DontBankOnTheBomb.com](http://www.DontBankOnTheBomb.com) website.

This briefing paper includes:

Introduction .................................................................................................................................. 1
Hall of Fame and Runners-up ......................................................................................................... 2
Hall of Fame institutions operating in The Netherlands .............................................................. 3
  ASN Bank .................................................................................................................................. 3
  Philips Pension Fund ................................................................................................................... 3
  PNO Media ................................................................................................................................ 3
  SNS Reaal .................................................................................................................................. 4
  Triodos ...................................................................................................................................... 4
Runners-up institutions operating in The Netherlands ................................................................. 5
  ABN Amro .................................................................................................................................. 5
  Achmea ..................................................................................................................................... 6
  BNP Paribas ............................................................................................................................... 6
  Commerzbank ............................................................................................................................ 7
  Crédit Agricole ........................................................................................................................... 7
  Credit Suisse .............................................................................................................................. 8
  Delta Lloyd ................................................................................................................................. 9
  ING ........................................................................................................................................... 9
  NIBC ........................................................................................................................................10
  Pensioenfonds APF (Private, The Netherlands) .......................................................................10
  Pensioenfonds Horeca & Catering (Private, The Netherlands) ................................................11
  PGGM (Private, The Netherlands) ...........................................................................................11
  Rabobank (Private, The Netherlands) .....................................................................................12
  Spoorwegpensioenfonds (Private, The Netherlands) ...............................................................12
  Stichting Pensioenfonds Openbaar Vervoer (Private, The Netherlands) ..............................13
  UniCredit ..................................................................................................................................13
The financial institutions identified include banks, pension funds, sovereign wealth funds, insurance companies and asset managers. They have provided various types of financial services to nuclear weapon companies including loans, investment banking and asset management.

All sources of financing provided since 1 January 2011 to the companies listed were analysed from annual reports, financial databases and other sources. The financial institutions which are most significantly involved in the financing of one or more nuclear weapon companies are shown here. See the full report for both a summary and full description of all financial institutions which are found to have the most significant financing relationships with one or more of the selected nuclear weapon companies, by means of participating in bank loans, by underwriting share or bond issues and/or by share- or bondholdings (above a threshold of 0.5% of all outstanding shares or bonds).

For more information on loans, investment banking, and asset management, please refer to the campaigner guide.

**Hall of Fame and Runners-up**

To identify financial institutions with a policy on nuclear weapons, we researched a variety of sources: NGO reports, screening-agency information, financial institutions’ reports and websites, information from campaigners worldwide and other public sources. Based on these, a list of financial institutions was compiled which could possibly have a specific nuclear weapons policy. **This is not a comprehensive list.** Websites and other publications of these financial institutions were researched to check their nuclear weapon policy. In addition, each of the Hall of Fame institutions were contacted before this report was published to confirm their institution description and to clarify any outstanding questions on their policies or investments.

The financial institutions for which a nuclear weapons policy was actually found, were grouped in two categories. Financial institutions with a clear and comprehensive nuclear weapons exclusion policy are included in the “Hall of Fame”, while financial institutions whose nuclear weapons policy is less strict or clear are included in the “Runners-up” category. To be included in the Hall of Fame, the nuclear weapons policy of the financial institution must meet the following criteria:

- The financial institution has published its policy and/or a summary of it;
- The policy excludes investments in nuclear weapon companies (withdrawing past investments and avoiding future investments)
- The policy has an ‘all-in’ comprehensive scope:
  - no exceptions for any types of nuclear weapon companies
  - no exceptions for any types of activities by nuclear weapon companies
  - no exceptions for any type of financing or investment by the financial institution

Financial institutions whose nuclear weapon policy does not meet all of the above criteria are included in the “Runners-up” category.
Hall of Fame institutions operating in The Netherlands

The Hall of Fame provides examples of institutions that have adopted and implemented comprehensive policies excluding all investments in nuclear weapon producing companies. The examples listed here are institutions operating – but not necessarily based in – your country.

**ASN Bank**

ASN Bank is the largest ethical bank in The Netherlands. It aims to promote a sustainable society by supporting and investing in socially responsible businesses and organisations.\(^1\) In 2013, ASN Bank served more than 600,000 customers.\(^2\)

ASN Bank’s Issue Paper on Human Rights sets absolute criteria for the arms sector. Consequently, ASN Bank refrains from all funding and investments in companies that are involved in the development, manufacture, distribution of or trade in arms. For a precise definition of arms, ASN Bank refers to the Common Military List of the European Union.\(^3\) This extensive list of weapons includes radioactive materials that are “adapted for use in war” and result in human or animal casualties, degraded equipment or damaged crops or the environment.\(^4\)

ASN Bank’s exclusion policy applies to its commercial banking, investment banking and asset management activities, regardless of whether they are managed internally or by external asset managers.\(^5\)

Instead of using an exclusion list, ASN Bank only invests in a company after a thorough examination of its activities and policies. The resulting ‘inclusion list’ is based on findings of data providers EIRIS and Sustainalytics, news reports and reports by civil society organisations.\(^6\) The list is published on the ASN Bank website. If a company is taken off the inclusion list, ASN will notify the company and publish the reason on its website.\(^7\)

Website: [https://www.asnbank.nl](https://www.asnbank.nl) | Twitter: [@asnbank](https://twitter.com/asnbank) | Facebook [https://www.facebook.com/asnbank](https://www.facebook.com/asnbank)

**Philips Pension Fund**

Philips Pension Fund is one of the largest corporate retirement plans in The Netherlands. It offers pension services to employees of Philips Electronics in The Netherlands.\(^8\) In 2013, Philips Pension Fund had over 103,000 participants.\(^9\)

In 2008, Philips Pension Fund started to integrate environmental, social and governance (ESG) criteria across its investments. This implied, among others, the implementation of an exclusion list. Philips Pension Fund’s exclusion policy states that the pension fund does not wish to invest in companies that are involved in the manufacture of controversial weapons. It includes five kinds of weapons in this category: anti-personnel mines, biological weapons, chemical weapons, cluster munitions and nuclear weapons.\(^10\) Philips Pension Fund has clarified that it also excludes companies that are in any other way involved in delivery systems specifically designed for nuclear weapons.\(^11\)

Philips Pension Fund’s exclusion policy applies to all asset management activities.\(^12\) Annually, the Fund draws up a list of excluded companies.\(^13\) The list is based on information from different external research organisations and is not publicly available.


**PNO Media**

PNO Media manages pensions for companies and organisations from the Dutch media industry. PNO Media is one of the larger pension funds in The Netherlands. It serves about 500 media companies and 48,100 clients.\(^14\)

In December 2012, PNO Media updated its responsible investment code and its exclusion list. Based on the Non-Proliferation Treaty, involvement in nuclear weapons was added as an exclusion
criterion.\textsuperscript{xv} PNO Media therefore excludes companies involved in the production, trade or maintenance of nuclear weapons. The 2012 Annual Report Responsible Investment lists several examples that would qualify for exclusion: a company that develops nuclear weapons; a company that is responsible for the maintenance of nuclear weapons; and a company that produces components that are specifically designed for nuclear weapons.\textsuperscript{xvi}

PNO Media’s exclusion policy applies to all its asset management activities, regardless of whether they are managed internally or by external asset managers.\textsuperscript{xvii}

PNO Media publishes an exclusion list, which is based on the advice of Hermes Equity Ownership Services. The latter makes use of the findings of external research organisation Sustainalytics.\textsuperscript{xviii} The exclusion list of PNO Media currently contains 28 companies involved in biological, chemical or nuclear weapons: Areva, Babcock & Wilcox, Babcock International, BAE Systems, Boeing, Dassault Aviation, EADS\textsuperscript{xx}, Fluor, GenCorp, General Dynamics, Honeywell International, Huntington Ingalls Industries, Jacobs Engineering, Kratos Defense & Security Solutions, Larsen & Toubro, Leidos, Lockheed Martin, MOOG, Norinco International Corporation, Northrop Grumman, Oceaneering International, Raytheon, Rockwell Collins, Rolls-Royce, Safran, Serco, Thales and URS.\textsuperscript{xxi}

Website: http://www.pnomedia.nl/ Twitter: @PNO_Media

SNS REAAL
SNS REAAL is one of the major financial bank assurance companies of The Netherlands. It focuses primarily on the retail market, including small and medium-sized businesses. SNS REAAL offers three key product groups: savings and investments, mortgages and other property finance, and insurance and pensions.\textsuperscript{xxii} In February 2013, the Dutch government nationalised SNS REAAL.\textsuperscript{xxiii}

The Fundamental Investment Principles of asset manager ACTIAM, a part of SNS REAAL, state that “ACTIAM does not invest in companies directly involved in the production, development, sale, or distribution of controversial weapons and/or essential and specialised components or services”.\textsuperscript{xxiv} The asset manager considers nuclear weapons to be controversial weapons.\textsuperscript{xxv}

The exclusion policy of SNS REAAL applies to all asset management categories, including assets managed by external managers.\textsuperscript{xxvi}

The exclusion list of ACTIAM, which is based on the findings of data provider Sustainalytics\textsuperscript{xxvii} currently contains 31 companies involved in controversial weapons: Aeroteh, ATK (Alliant Techsystems), Aryt Industries, Ashot Ashkelon, Babcock & Wilcox, Babcock International, BAE Systems, Boeing, Computer Sciences Corp, EADS\textsuperscript{xxviii}, Exelis, Finmeccanica, GenCorp, Hanwha Corp, General Dynamics, Honeywell International, Jacobs Engineering, Larsen & Toubro, Lockheed Martin, Norinco International, Northrop Grumman, Raytheon, Rheinmetall, Rolls Royce, Safran, Serco, Singapore Technologies, Splav, Poongsan Corp, Textron and Thales.\textsuperscript{xxix}

Website: http://www.snsreaal.nl/ Twitter: @snsreaal Facebook https://www.facebook.com/snsreaal

Triodos
Triodos Bank is one of the world’s leading sustainable banks, operating in Belgium, Germany, The Netherlands, Spain and the United Kingdom. Its banking and investment activities are directed at bringing positive social, environmental and cultural change.\textsuperscript{xxx}

Triodos Bank excludes all companies involved in arms-related activities. This includes the development, manufacture, maintenance and selling of weapons, as well as specifically designed components for weapons and services for the arms industry that are essential to the functioning of weapons.\textsuperscript{xxxi} The policy applies to both conventional and non-conventional weapons, including nuclear weapons.\textsuperscript{xxxii}
Triodos Bank’s exclusion policy applies to its commercial banking, investment banking and asset management activities, regardless of whether they are managed internally or by external asset managers. Triodos Bank pro-actively supports the banning of nuclear weapons. Emphasising the value of transparency, Triodos publishes an inclusion list, based on information from data provider Sustainalytics, which contains all companies eligible for investments by Triodos SRI funds and Triodos Bank Private Banking.

<table>
<thead>
<tr>
<th>Website:</th>
<th>Twitter:</th>
<th>Facebook</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="http://www.triodos.com/">http://www.triodos.com/</a></td>
<td>@TriodosNL; @TriodosUK; @TRiodosBE; @triodos_bank_de</td>
<td><a href="https://www.facebook.com/TriodosFoundation">https://www.facebook.com/TriodosFoundation</a></td>
</tr>
</tbody>
</table>

**Runners-up institutions operating in The Netherlands**

The Runners-up category provides examples of institutions that have adopted and implemented policies excluding investments in nuclear weapon producing companies but whose policy is either not fully comprehensive or not implemented consistently. The examples listed here are institutions operating – but not necessarily based in – your country.

**ABN Amro**

ABN Amro is a Dutch banking group that serves retail, private and commercial banking customers in The Netherlands and across the globe. The Dutch state acquired ownership of the Dutch activities of ABN Amro Holding N.V. and Fortis Bank Nederland in 2008. ABN Amro and Fortis Bank Nederland (formerly part of the Dutch-Belgian Fortis Group) merged in 2010 to form the current ABN Amro.

ABN Amro’s Defence Policy states that the banking group does not finance or invest in companies involved in the manufacture, maintenance and trade of nuclear weapons or delivery systems that are specifically designed for nuclear weapons. ABN Amro also excludes companies that develop nuclear weapons, provided that they are based in a country that is not a NATO Member State and has not joined the Non-Proliferation Treaty (NPT).

The exclusion policy applies to ABN Amro’s commercial banking, investment banking and asset management activities, except for its passively managed funds and third-party investments. Regarding the latter, ABN Amro only excludes nuclear weapons producers from non-NATO Member States that have not joined the NPT. The exclusion policy “does not apply to assets managed by external parties for which ABN AMRO has developed a separate engagement strategy.”

In 2012, ABN Amro introduced its Controversial Weapons List, which features businesses that are excluded for their involvement in controversial weapons. The list, which is based on the findings of data provider Sustainalytics, is not publicly available.

*We commend ABN Amro for having a policy excluding nuclear weapons producers. For a place in the Hall of Fame, ABN Amro should apply its policy to all the financial products that the bank offers, including for example passively managed funds. For third-party investments, ABN Amro should no longer make a distinction between companies from countries that have or have not joined the NPT or NATO. Furthermore, ABN Amro should apply its policy to assets managed by external parties. We encourage ABN Amro to further strengthen the policy, so that it may be listed in the Hall of Fame of a future update of this report.*

<table>
<thead>
<tr>
<th>Website:</th>
<th>Twitter:</th>
<th>Facebook:</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="http://www.abnamro.com/">http://www.abnamro.com/</a></td>
<td>@ABNAMRO</td>
<td><a href="https://www.facebook.com/abnamro">https://www.facebook.com/abnamro</a></td>
</tr>
</tbody>
</table>
Achmea

Achmea is the largest insurance company in The Netherlands, serving about half of all Dutch households. Achmea provides its almost 8 million customers with health, life and other types of insurance.

According to its exclusion policy, Achmea does not invest in companies involved in the development, testing, production, maintenance, sale and trade of nuclear weapons or delivery systems designed for nuclear weapons. "Companies that produce delivery systems which have been designed exclusively for delivering nuclear warheads are excluded from investments. In general Achmea excludes producers of nuclear weapons as such, as well as companies which deliver essential parts and/or services for producing such weapons", according to Achmea.

The policy is applied to 98% of Achmea's investments. The remaining 2% of the assets are invested in externally managed funds. The policy is not applied to these investments, although alternatives (funds excluding nuclear weapons) are being sought by Achmea. The policy applies to the pool of fixed-interest securities and to pension fund mandates, but only if the pension fund requests this. Therefore, some pension funds could still invest outside Achmea's policy.

The exclusion list, which is publicly available, contains 26 companies involved in nuclear weapons: ATK (Alliant Techsystems), Areva, Babcock International Group, BAE Systems, Boeing, EADS, Finmeccanica, Fluor, General Dynamics, Honeywell International, Huntington Ingalls Industries, Jacobs Engineering, Kratos Defence and Security Solutions, Larsen & Toubro, Leidos, L-3 Communications, Lockheed Martin, MOOG, Northrop Grumman, Raytheon, Rolls-Royce, Safran, Serco, Thales, United Technologies and URS. In its investment selection, Achmea uses the services of Ethix, a specialised firm in social responsible investment consulting activities.

We recommend Achmea for its nuclear weapons policy. For a place in the Hall of Fame, Achmea should oblige external asset managers to apply the policy to both actively and passively managed funds. Furthermore, the policy should be applied to all pension fund mandates. We encourage Achmea to further strengthen the policy, so that it may be listed in the Hall of Fame of a future update of this report.

Website: https://www.achmea.nl  Twitter: @achmea  Facebook: https://www.facebook.com/achmea

BNP Paribas

BNP Paribas is a leading French bank that offers services in corporate and investment banking, private banking and asset management. It operates in 75 countries and has nearly 185,000 employees worldwide.

BNP Paribas' Corporate Social Responsibility Sector Policy on Defence states that "providing financial products and services to or investing companies that produce, trade, store or carry out any other activity related to "controversial weapons" should be avoided". This includes all specifically designed components that represent a significant building block in the functioning of the weapon. Based on the Non-Proliferation Treaty (NPT), BNP Paribas considers nuclear weapons to be controversial weapons. However, the bank adds that its policy does not apply to companies that only contribute to government-controlled nuclear weapon programs in NATO Member States that have joined the NPT. BNP defines a nuclear weapon as "a device that is capable of releasing nuclear energy in an uncontrolled manner and which has a group of characteristics that are appropriate for use for warlike purposes". This definition is drawn from the Treaty for the Prohibition of Nuclear Weapons in Latin America and the Caribbean.

The exclusion policy applies to all commercial banking and investment banking activities, as well as to the asset management arm of BNP Paribas. An exception is made for investments made on behalf of Syntrus Achmea.

1 In the 2013 Don't Bank on the Bomb, Syntrus Achmea was listed. However, Syntrus Achmea is part of Achmea. Only the parent company Achmea is listed in this report.
third parties and for passively managed funds.\textsuperscript{iv} The exclusion policy also does not apply to BNP Paribas’ external asset managers.\textsuperscript{vii} The exclusion policy covers only new clients and new financing agreements.\textsuperscript{vii} Existing loan contracts are terminated in cooperation with BNP Paribas’ clients within a specific timeframe.\textsuperscript{viii}

BNP Paribas currently excludes around 90 controversial weapons producers. It does not publish the list.\textsuperscript{ix}

We commend BNP Paribas for having a nuclear weapons policy. As BNP Paribas does not exclude companies that are involved in government-controlled nuclear weapon programs in NATO Member States it means BNP Paribas allows investment in nuclear weapons producers that operate in France, the United Kingdom and the United States. This is a major loophole in BNP Paribas’ nuclear weapons policy. In addition, the policy does not apply to all asset management activities and covers only new financing agreements immediately. We encourage BNP Paribas to further strengthen the policy, so that it may be listed in the Hall of Fame of a future update of this report.

Website:  
http://www.bnpparibas.com/  
Twitter:  
@BNPPARIBAS_NET  
Facebook:  
https://www.facebook.com/bnpparibas.net

\textbf{Commerzbank}

Commerzbank is one of the leading banks in Germany and Poland. It offers banking and capital market services to nearly 15 million private customers and 1 million business and corporate clients.\textsuperscript{x}

According to Commerzbank’ policy on the armaments sector, the bank \textit{“does not in any circumstances involve itself in transactions related to controversial weapons”}.\textsuperscript{xi} For a definition of controversial weapons, Commerzbank refers to the German War Weapons Control Act,\textsuperscript{xii} which provides an elaborate definition of nuclear weapons based on the revised Brussels Treaty of 1954.\textsuperscript{xiii}

In principle, this means that Commerzbank excludes all companies that are involved in controversial weapons. However, if the involvement constitutes only a small part of the company’s businesses, Commerzbank allows investment as long as the bilateral contract specifically states that funds will not be used for any activity that is related to controversial weapons.\textsuperscript{xiv}

The exclusion policy applies to the bank’s commercial banking and investment banking activities, as well as to the investments made on its own account and its actively managed funds. However, clients can request the execution of a buying-order of a specific investment that may contain a cluster munitions producer. The same applies to orders of such investments through Online-Banking.\textsuperscript{xv}

Commerzbank does not publish its exclusion list, which is based on the findings of data provider Sustainalytics.\textsuperscript{xvi}

We commend Commerzbank for having a nuclear weapons policy. For a place in the Hall of Fame, Commerzbank should apply its policy to all nuclear weapons producers, including companies whose involvement in controversial weapons constitutes only a small part of their activities. Furthermore, Commerzbank’s should apply its exclusion policy all asset management categories. We encourage Commerzbank to further strengthen the policy, so that it may be listed in the Hall of Fame of a future update of this report.

Website:  
https://www.commerzbank.de  
Twitter:  
@commerzbank  
Facebook:  
https://www.facebook.com/commerzbank

\textbf{Crédit Agricole}

Crédit Agricole Group is a French banking group operating in retail, corporate and investment banking and offering special financial services.\textsuperscript{xvii} With 49 million customers, 7.4 million mutual shareholders and 1.2 million shareholders, Crédit Agricole is one of the leading banks in Europe.\textsuperscript{xviii}
Crédit Agricole’s policy on the armaments sector states that investments from the bank’s own account or on behalf of third parties (apart from indexed investing), financing of any sort, and services are prohibited for companies that are linked to the production, storage or sale of sensitive arms, including nuclear weapons.\textsuperscript{lxix} The bank regards the warhead to be the essential element of a nuclear weapon. Consequently, it defines a nuclear weapons producer as a company that is involved in the design, manufacturing, modernisation and maintenance of nuclear warheads. Companies that produce ‘non-nuclear’ components of these weapons therefore do not fall under this category. Crédit Agricole stresses that it is difficult to assess which of these components are essential for nuclear weapons.\textsuperscript{lxx}

The exclusion policy applies to commercial and investment banking activities, as well as to Crédit Agricole’s own investments. Not all investments made on behalf of third parties, i.e. discretionary mandates and passively managed funds, are included in the policy.\textsuperscript{lxxi} The exclusion policy does not apply to external asset managers either, although Crédit Agricole supports actions taken at the European and international level towards index providers.\textsuperscript{lxxii}

Crédit Agricole uses an exclusion list\textsuperscript{lxxiii} based on the findings of external consultants,\textsuperscript{lxxiv} but does not publish the list.

We commend Crédit Agricole for having a nuclear weapons policy. For a place in the Hall of Fame, Crédit Agricole should broaden its definition of a nuclear weapons producer. It should exclude companies involved in the production of, or any other activity related to specifically designed components for nuclear weapons. Furthermore, Crédit Agricole should apply its policy to all of its financial products, including all asset management categories. We encourage Crédit Agricole to further strengthen the policy, so that it may be listed in the Hall of Fame in a future update of this report.

Website: http://www.credit-agricole.fr/  
Twitter: @CreditAgricole  
Facebook: https://www.facebook.com/CreditAgricole

**Credit Suisse**

Credit Suisse is a Swiss bank that focuses on private banking and investment banking for corporate, institutional and government clients and for high-net-worth private clients worldwide. The bank also serves retail clients in Switzerland.\textsuperscript{lxxv} With 46,000 employees\textsuperscript{lxxvi} and operations in more than 50 countries, Credit Suisse is one of the world’s leading banks.\textsuperscript{lxxvii}

Credit Suisse’s Controversial Weapons Policy is based on the Swiss Federal War Materials Act. As a result, the bank "will not directly finance the development, manufacture and acquisition of nuclear, biological and chemical weapons, anti-personnel mines and cluster munitions.\textsuperscript{*}\textsuperscript{lxxviii} The manufacture of nuclear weapons also covers the maintenance of these weapons. In addition, Credit Suisse does not finance activities related to delivery systems that are specifically designed for nuclear weapons. However, the Bank states it "may provide services to nuclear weapons producers if the financing of the development, manufacture or acquisition of such weapons can be excluded.\textsuperscript{lxxix}"

Credit Suisse also states that it excludes investment banking activities related to nuclear weapons and investments in nuclear weapons producers that it makes on its own account. The exclusion policy does not apply to Credit Suisse’s other asset management activities nor to its external asset managers. The bank does not publish its exclusion list, which is based on the information from Sustainalytics\textsuperscript{lx}.\textsuperscript{lx}

We commend Credit Suisse for having a nuclear weapons policy. To be listed in the Hall of Fame, Credit Suisse should exclude the financing of nuclear weapons producers instead of only the activities related to nuclear weapons. Furthermore, Credit Suisse should apply its policy to all asset management categories and it should divest from investment holdings in nuclear weapons producers. We encourage Credit Suisse to further strengthen the policy, so that it may be listed in the Hall of Fame of a future update of this report.

Website:  
Twitter:  
Facebook:
Delta Lloyd

Delta Lloyd Group is a Dutch financial institution that offers products and services in the areas of insurance, pensions, investing, and banking. In February 2013, Delta Lloyd announced an expansion of its policy on controversial weapons to include nuclear weapons, specifying that "Delta Lloyd no longer invests in companies that are involved in the production, maintenance or testing of nuclear weapons." As a result of this decision, Delta Lloyd divested from four companies with a joint value of about €3.8 million and added a total of 30 companies to its exclusion list.

Both internal and external asset managers of Delta Lloyd must comply with the exclusion list. The policy is applied to all banking activities of Delta Lloyd. Contracts are terminated immediately if a company is found to be a nuclear weapons producer.

In the first quarter of 2014, the following publicly listed companies were excluded for involvement in nuclear weapons: ATK (Alliant Techsystems), Babcock International, Babcock & Wilcox, GenCorp, General Dynamics, Huntington Ingalls Industries, L&T Finance Holdings, Northrop Grumman, Raytheon, Safran and Technofan. The publicly available exclusion list is based on the findings of external research company Sustainalytics.

We commend Delta Lloyd for having a nuclear weapon policy and for expanding the scope of its policy in the past months. We encourage Delta Lloyd to divest from the remaining nuclear weapons associated companies in its portfolio, so that it may be listed in the Hall of Fame in our next report.

ING

ING Group is a global financial service company of Dutch origin, operating in the fields of banking, asset management, life insurance and retirement services. ING serves over 47 million private, corporate and institutional customers from more than 40 countries. It employs over 75,000 people worldwide.

ING's nuclear weapons policy states that companies that mainly focus on defence-related businesses and that are involved in the development, manufacture, maintenance and trading of nuclear weapons or specifically designed delivery systems are excluded. However, ING may finance or invest in nuclear weapons producers with largely non-defence related businesses if those companies indicate that ING funds will not be used for nuclear weapon-related activities.

The policy applies to ING's commercial banking and investment banking, as well as to the investments made on its own accounts and actively managed funds managed both internally and externally. ING makes three exceptions to the exclusion policy. The policy does not apply to: investments made on behalf of clients in the U.S., where ING claims it cannot enforce its policy; investments made within the boundaries of an explicit customer mandate; and funds following an index. ING requires that its external asset managers apply the exclusion policy to their discretionary mandates.

The exclusion list of ING, which is based on information from NGOs, customer screening and Sustainalytics, is not publicly available.

We commend ING for having a nuclear weapons policy. For a place in the Hall of Fame, ING should exclude companies regardless of the relative proportion of nuclear related activities of the company and ING should exclude companies as a whole rather than the activities of nuclear weapons producers. ING should apply its policy to all its markets including in the US, to all its customer and to
all its products, including funds following an index. We encourage ING to further strengthen the policy, so that it may be listed in the Hall of Fame in a future update of this report.

Website: http://www.ing.com/  
Twitter: @ING_News  
Facebook: https://www.facebook.com/ING

**NIBC**

NIBC is a Dutch bank that offers corporate and consumer banking activities. The corporate banking arm covers a combination of advice, financing and co-investment activities, whereas the consumer banking department focuses primarily on residential mortgages and online retail saving deposits in Belgium, Germany and The Netherlands. NIBC has approximately 600 employees. NIBC is not active in asset management, nor does it outsource asset management activities.

NIBC’s sustainability policy excludes financing the manufacture, use, trade, stockpile or service of highly controversial weapons. NIBC considers nuclear weapons to be highly controversial weapons. NIBC uses the following definition of nuclear weapons: "For the purpose of this policy, the term nuclear weapon includes the weapon as a whole, as well as its key component parts, specifically designed to form part of the nuclear weapon (e.g. nuclear warheads, missiles carrying the warheads, tailor-made electric/electronic systems, enriched plutonium / uranium, specifically designed engines and guidance systems). Submarines that are designed to launch nuclear missiles are also considered a key component of nuclear weapons production. Services such as testing and maintaining / upgrading of nuclear weapons qualify as servicing nuclear weapons and therefore are also excluded from financing."

However, NIBC allows for investments in specific projects of nuclear weapons producers, “provided that the financial services are used for the specific project and not used for the production, sale or distribution of controversial weapons”. The policy applies to investment banking activities. In loan contracts with companies, NIBC includes ‘material adverse clauses’, which obliges companies to make notice of any material changes in their activities. NIBC makes use of a non-published exclusion list.

We commend NIBC for having a nuclear weapons policy. For a place in the Hall of Fame, NIBC should exclude producers as a whole rather than only activities of producers. We encourage NIBC to further strengthen the policy, so that it may be listed in the Hall of Fame in our next report.

Website: www.nibc.nl/  
Twitter: @NIBC_Bank  
Facebook: https://www.facebook.com/nibcdirectnl

**Pensioenfonds APF (Private, The Netherlands)**

Pensioenfonds APF provides retirement benefits for employees of AkzoNobel. It has close to 6,000 active participants, more than 13,000 former participants and over 18,000 pensioners.

Pensioenfonds APF excludes companies involved in the development, testing, production, maintenance, selling or distribution of nuclear weapons. The exclusion criteria also prohibit investment in companies involved in the development, manufacture and maintenance of missiles that are primarily used for carrying nuclear munitions and of submarines equipped with ballistic missiles.

The exclusion policy applies to all investments made by the pension fund’s external asset manager Syntrus Achmea, including direct investments in European, U.S. and Japanese assets. Pensioenfonds APF also invests in several Emerging Markets Funds, for which nuclear weapons are not an exclusion criterion. Consequently, Pensioenfonds APF’s exclusion policy regarding nuclear weapons applies approximately 93% of its investment portfolio. The exclusion list, which is based on the findings of external research organisation Ethix SRI Advisors, is not publicly available.

We commend Pensioenfonds APF for having a nuclear weapons policy. Pensioenfonds APF has a detailed nuclear weapons policy, but to be listed in the Hall of Fame, it should strengthen the policy to cover investments in Emerging Markets Funds that do not exclude nuclear weapons. We encourage
Pensioenfonds APF to further strengthen the policy, so that it may be listed in the Hall of Fame in our next report.

Website:
https://www.pensioenfondsapf.nl/

**Pensioenfonds Horeca & Catering (Private, The Netherlands)**

Pensioenfonds Horeca & Catering is the mandatory pension fund for the Dutch hospitality and catering industry. Pensioenfonds Horeca & Catering has about 850,000 participants.

After researching the importance of socially responsible investment to employers and employees from the hospitality and catering industry in 2007, Pensioenfonds Horeca & Catering started employing an active exclusion policy as of 2008. The policy is based on the recommendations made by the Council of Ethics of the Norwegian Government Pension Fund. As such, the Pensioenfonds Horeca & Catering excludes producers and developers of nuclear weapons.

Pensioenfonds Horeca & Catering does not manage assets itself, but the exclusion policy applies to all external asset managers. Because Horeca & Catering uses the recommendations of the Council of Ethics of the Norwegian Government Pension Fund, it does not exclude (all) companies involved in maintenance of nuclear weapons, nor specifically designed delivery systems.

Pensioenfonds Horeca & Catering improved its responsible investment policy since the 2013 ‘Don’t Bank on the Bomb’ report by terminating its investment in the passive US Small Cap Investment Fund. The exclusion policy now applies to 100% of the public equity investments. Furthermore, the pension fund decided in 2014 to strengthen the policy by no longer depending on the recommendations of the Norwegian Government Pension Fund: “The Fund will formulate its own exclusion policy where certain themes are excluded from the investment universe. One of these themes is controversial weapons, including cluster and nuclear weapons. An external research provider will be selected in 2014.”

The exclusion list of the pension fund currently contains 11 listed companies that are involved in nuclear weapons: Babcock & Wilcox, Boeing, EADS Co, EADS Finance BV, GenCorp, Honeywell International, Jacobs Engineering, Lockheed Martin, Northrop Grumman, Safran and Serco.

We commend Pensioenfonds Horeca & Catering for having a nuclear weapons policy. For a place in the Hall of Fame, Pensioenfonds Horeca & Catering should exclude all companies involved in maintenance of nuclear weapons and companies involved in specifically designed delivery systems. We encourage Pensioenfonds Horeca & Catering to further strengthen the policy, so that it may be listed in the Hall of Fame in our next report.

Website:  Facebook:
www.phenc.nl/  https://www.facebook.com/PensioenfondsHorecaEnCatering

**PGGM (Private, The Netherlands)**

PGGM is a leading Dutch pension administrator that provides services in pension administration, communication, board advisement and asset management. It manages pension assets for seven pension funds and serves over 570,000 participants.

PGGM’s controversial weapons policy states that PGGM does not invest in companies whose “activities include the production, development and sale of adapted high-grade components of the nuclear warhead, the rocket or the entire weapon and the maintenance and improvement of the weapon”. This was defined in line with the UN Treaty for the Prohibition of Nuclear Weapons in Latin America and the Caribbean (Treaty of Tlatelolco), as the 1968 Non-Proliferation Treaty does not contain a clear definition of nuclear weapons.

PGGM’s exclusion policy applies to all asset management activities, regardless of whether they are managed internally or by external asset managers.
PGGM’s exclusion list is based on information from external agencies and currently contains 23 companies involved in nuclear weapons: Babcock & Wilcox, Babcock International, BAE Systems, Boeing, EADS, Exelis, Finmeccanica, Fluor, GenCorp, General Dynamics, Honeywell International, Huntington Ingalls Industries, Jacobs Engineering, Lockheed Martin, MOOG, Northrop Grumman, Raytheon, Rockwell Collins, Safran, Serco, Thales, URS and Walchandnagar Industries.

We commend PGGM for having a nuclear weapon policy. We encourage PGGM to divest from the remaining nuclear weapons associated companies in its portfolio, so that it may be listed in the Hall of Fame in our next report.

Website: https://www.pggm.nl  Twitter: @PGGMzeist  Facebook: https://www.facebook.com/pages/PGGM/152369754795160

Rabobank (Private, The Netherlands)
Rabobank Group, based in The Netherlands, is one of the world’s leading financial institutions. It offers services in the field of banking, asset management, leasing, insurance and real estate. Rabobank has over 56,000 employees worldwide.

In its Armaments Industry policy, Rabobank states that it does not provide financial services to companies involved in controversial armaments, nor does it invest its own funds in any activity related to these weapons. The financial group considers nuclear weapons controversial weapons. Involvement includes the development, manufacture, maintenance and selling of nuclear weapons and of delivery systems that are specifically designed for nuclear weapons.

The exclusion policy applies to Rabobank’s commercial banking, investment banking, and all asset management activities, including passively managed funds distributed by Rabobank. The policy is also applicable to Rabobank’s direct investments. However, the policy allows for investments in passively managed funds containing less than 5% of controversial weapons producers.

An exception is made for passively managed funds controlled by external asset managers, as Rabobank states that its externally managed passive funds cannot be linked to more than 5% of its stock basket to controversial weapons. Rabobank has been in dialogue with external asset managers who do not yet exclude nuclear weapons. The exclusion list of Rabobank, which is based on external research, is not publicly available.

We commend Rabobank for having a nuclear weapons policy. Since last year’s report, Rabobank has extended its nuclear weapons policy to the majority of its passively managed funds that are controlled by its own asset managers. However, the policy allows for investments in passively managed funds containing less than 5% of controversial weapons producers. The same exception is made for external passive funds. We encourage Rabobank to further strengthen the policy, so that it may be listed in the Hall of Fame in a future update of this report.

Website: https://www.rabobank.com/  Twitter: @Rabobank  Facebook: http://www.facebook.com/rabobank

Spoorwegpensioenfonds (Private, The Netherlands)
Spoorwegpensioenfonds (Railways Pension Fund) offers a pension plan to companies and past and present employees in the Dutch railway transport industry. It has over 29,000 active participants, 25,000 pensioners and 65 affiliated companies.

Spoorwegpensioenfonds excludes all companies that are directly involved in the development, production or maintenance of nuclear weapons or delivery systems for these weapons, as well as the trade in both. Direct involvement is understood as "being involved in the production of key components of a nuclear weapon and/or components that are specifically designed to be used for/in nuclear weapons".
Spoorwegpensioenfonds's exclusion policy applies to all asset management activities. External asset managers are instructed to fully apply the policy.

The pension fund recently increased its transparency by publishing the complete exclusion list, which currently contains 20 companies with activities related to nuclear weapons: ATK (Alliant Techsystems), Babcock International, Babcock & Wilcox, BAE Systems, Boeing, Dassault Aviation, EADS, GenCorp, General Dynamics, Huntington Ingalls Industries, Exelis, Jacobs Engineering, Lockheed Martin, Northrop Grumman, Raytheon, Safran, Serco, Thales, United Technologies Corporation and URS.

Spoorwegpensioenfonds was listed in the Hall of Fame of 2013's report. This year however, we found an investment in nuclear weapon associated company ThyssenKrupp in its portfolio. We encourage Spoorwegpensioenfonds to reconsider its involvement in ThyssenKrupp so that it may be listed in the Hall of Fame in our next report.

Website: http://www.spoorwegpensioenfonds.nl/
Twitter: @SPF_NL

Stichting Pensioenfonds Openbaar Vervoer (Private, The Netherlands)
Stichting Pensioenfonds Openbaar Vervoer (SPOV- Public Transportation Pension Fund) offers a pension plan to companies, employees and former employees from the Dutch public transport sector.
The pension fund has somewhat less than 11,000 members and over 10,000 pensioners.

SPOV does not in any way invest in controversial weapons, which the pension fund defines as those weapons that cause a disproportionate number of human casualties. Nuclear weapons are among the examples of controversial weapons explicitly mentioned by SPOV. SPOV excludes all companies involved in the development, production or maintenance of "key components of a nuclear weapon and/or components that are specifically designed to be used for/in nuclear weapons". SPOV also excludes companies involved in the trade of nuclear weapons.

The exclusion policy applies to all asset management activities. External asset managers are instructed to fully apply the policy.

The pension fund recently increased its transparency by publishing the complete exclusion list, which currently contains 20 companies with activities related to nuclear weapons: ATK (Alliant Techsystems), Babcock International, Babcock & Wilcox, BAE Systems, Boeing, Dassault Aviation, EADS, GenCorp, General Dynamics, Huntington Ingalls Industries, Exelis, Jacobs Engineering, Lockheed Martin, Northrop Grumman, Raytheon, Safran, Serco, Thales, United Technologies Corporation and URS.

We commend SPOV for having a nuclear weapon policy. We encourage SPOV to divest from ThyssenKrupp, the last remaining nuclear weapons associated company in its portfolio, so that it may be listed in the Hall of Fame in our next report.

Website: http://www.spoov.nl/
Twitter: @SPOV_NL

UniCredit
UniCredit is a leading Italian banking group that provides corporate, investment and private banking services. It operates in 17 European countries and has more than 130,000 employees.

UniCredit’s Position Statement on Defence/Weapons Industry states that "any involvement of UniCredit in business transactions concerning weapons is restricted to countries that comply with the most important international Treaties and Conventions on the following issues: nuclear weapons, biological & chemical weapons, conventional weapons, missiles, small arms, light weapons and dual-use goods." In addition, the bank "abstains from financing transactions involving manufacturing, maintaining or trading controversial/unconventional products such as nuclear, biological & chemical weapons of mass destruction, cluster bombs, mines and Uranium 238." Although it is not clearly

DON'T BANK ON THE BOMB
September 2014
The Netherlands Briefing Paper
stated in the Position Statement, according to the bank’s 2007 Sustainability Report UniCredit excludes any involvement with nuclear weapons producers.\(^{cxlv}\)

UniCredit considers delivery systems that are specifically designed for nuclear weapons to fall under the nuclear weapons category. Its definition of manufacturing includes the development of these weapons as well.\(^\text{cxlvii}\)

UniCredit’s nuclear weapons policy applies to its commercial banking and investment banking activities.\(^{cxlx}\) The bank’s asset management unit, Pioneer Investments, does not apply the nuclear weapons policy to all asset management categories.\(^{cl}\) UniCredit makes use of an exclusion list, but the list is not publicly available.\(^{cli}\) The list is based on information from specialist advisory firms and tools such as Oekom and RepRisk.\(^{clii}\)

*We commend UniCredit for having a nuclear weapons policy. However, it remains unclear which nuclear weapons policy is maintained by UniCredit’s asset manager and whether existing loan contracts are terminated if a loan holder appears to be involved in nuclear weapons. We encourage UniCredit to further strengthen the policy, so that it may be listed in the Hall of Fame in a future update of this report.*

Website: https://www.unicreditgroup.eu  
Twitter: @UniCredit_PR

---

**Van Lanschot**

Van Lanschot Bankiers offers private banking to wealthy private customers, entrepreneurs and family companies, and merchant banking to business professionals and executives, healthcare professionals, and associations and foundations. Van Lanschot has over 1,800 employees working in its offices in Belgium, The Netherlands and Switzerland.\(^{cliii}\)

Van Lanschot does not finance or invest in companies involved in the development, production, testing, storing, maintenance and selling of controversial weapons, including nuclear weapons, or of essential components for these weapons, including specifically designed delivery systems.\(^{cliv}\)

Van Lanschot’s exclusion policy applies to its commercial banking, investment banking and internal asset management activities. In 2013, 60% of the private banking and 71% of the asset management assets were screened by the responsible investment policy.\(^{clv}\)

Not all funds that are controlled by external asset managers on behalf of Van Lanschot are incorporated in the nuclear weapons policy. However, the bank explains to its clients whether or not the investments managed by external asset managers comply with its policy, and leaves the decision to divest with the client.\(^{clvi}\)

The exclusion list of Kempen & Co, asset manager and subsidiary of Van Lanschot Bankiers, currently contains 7 companies involved in nuclear weapons: Bechtel, Babcock & Wilcox, Fluor, Honeywell International, Jacobs Engineering, Newport News Nuclear and Serco.\(^{clvii}\) The list is based on the findings of external research provider Global Engagement Services (GES).\(^{clviii}\)

*We commend Van Lanschot for having a nuclear weapons policy. For a place in the Hall of Fame, Van Lanschot should apply the policy to all financial products managed by external asset manager. We encourage Van Lanschot to further strengthen the policy, so that it may be listed in the Hall of Fame of our next report.*

Website: https://www.vanlanschot.nl/  
Twitter: @VanLanschot  
Facebook: https://facebook.com/vanlanschot

---

**Hall of Shame**
This section contains the results of our research into which financial institutions are financing and/or investing in the nuclear weapon companies identified in the report. The analysis was performed according to the methodology and thresholds defined in the methodology explanations below. Each section provides the following information for each financial institution:

- The types of financial relations which the financial institution has with one or more nuclear weapon companies. The relations are grouped by loans, investment banking and asset management. Financial activities are listed alphabetically by nuclear weapons company for each category.
- The name of the receiving company, the amount, the date and (if known) the purpose for each financial relation. For loans and bonds the maturity date is given, as well as the interest rate.

**ABP**

ABP has made an estimated 277 million USD available to the nuclear weapons producers listed in this report since January 2011.

The table below provides an overview of the nuclear weapon companies of which ABP (Netherlands) owns or manages 0.50% or more of the outstanding shares at the most recent available filing date.

<table>
<thead>
<tr>
<th>Company</th>
<th>Country</th>
<th>Total value (US$ mln)</th>
<th>% Outstanding</th>
<th>Filing date</th>
</tr>
</thead>
<tbody>
<tr>
<td>BAE Systems</td>
<td>United Kingdom</td>
<td>108</td>
<td>0.63</td>
<td>11-Jan-2013</td>
</tr>
<tr>
<td>Safran</td>
<td>France</td>
<td>170</td>
<td>0.59</td>
<td>31-Dec-2013</td>
</tr>
</tbody>
</table>


**ING Group**

ING Group has made an estimated 344 million USD available to the nuclear weapons producers listed in this report since January 2011.

The table below provides an overview of the loans provided by ING Group (Netherlands) to the nuclear weapon companies since January 2011.

<table>
<thead>
<tr>
<th>Company</th>
<th>Subsidiary</th>
<th>Use of Proceeds</th>
<th>Total value (US$ mln)</th>
<th>Est. participation of this bank (US$ mln)</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Airbus Group</td>
<td>EADS</td>
<td>General</td>
<td>4,345</td>
<td>76</td>
<td>14-Mar-2011</td>
</tr>
<tr>
<td>Fluor</td>
<td>Fluor Corp</td>
<td>General</td>
<td>1,800</td>
<td>180</td>
<td>07-Nov-2012</td>
</tr>
</tbody>
</table>


The table below provides an overview of the underwriting of bond issuances by ING Group (Netherlands) for the nuclear weapon companies since January 2011.

<table>
<thead>
<tr>
<th>Company</th>
<th>Subsidiary</th>
<th>Use of Proceeds</th>
<th>Total value (US$ mln)</th>
<th>Est. participation of this bank (US$ mln)</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fluor</td>
<td>Fluor Corp</td>
<td>General</td>
<td>500</td>
<td>20</td>
<td>09-Aug-2011</td>
</tr>
</tbody>
</table>


The table below provides an overview of the nuclear weapon companies of which ING Group (Netherlands) owns or manages 0.50% or more of the outstanding bonds at the most recent available filing date.
### Bondholdings managed by ING Group

<table>
<thead>
<tr>
<th>Company</th>
<th>Country</th>
<th>Total value (US$ mln)</th>
<th>% Outstanding</th>
<th>Filing date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Honeywell International</td>
<td>United States</td>
<td>48</td>
<td>0.77</td>
<td>31-Mar-2014</td>
</tr>
<tr>
<td>Leidos</td>
<td>United States</td>
<td>10</td>
<td>0.77</td>
<td>31-Mar-2014</td>
</tr>
<tr>
<td>Rockwell Collins</td>
<td>United States</td>
<td>10</td>
<td>0.62</td>
<td>31-Mar-2014</td>
</tr>
</tbody>
</table>


### Methodology

Which financial institutions are involved in the financing of the selected nuclear weapon companies was researched by using annual reports, stock exchange filings and other publications of the companies concerned, archives of trade magazines, local newspapers and the financial press as well as specialized financial databases (Thomson ONE, Bloomberg). Used resources are clearly mentioned.

If the amounts per financial institution were known, these amounts were used. If the amounts were unknown, an estimate was used. The estimates are based on the following rules of thumb:

- In the case of loans (corporate loans or revolving credit facilities), 40% of the total amount is committed by bookrunners and 60% by other participants of the syndicate. If, however, the amount of bookrunners is (almost) equal to, or higher than, the amount of participants, the reverse is used: 60% for the bookrunners and 40% for the arrangers. So if there are for example 5 bookrunners and 4 participants and the amount of the loan is € 100, the estimate will be that the bookrunners commit 60% (€ 12 each) and the participants 40% (€ 10 each). The amount provided by bookrunners is always higher than the amount provided by participants;
- In the case of share- and bond issuances, 75% of the total amount is committed by bookrunners and 25% by other participants of the syndicate. The amount provided by bookrunners should always be higher than the amount provided by participants.
- In the case of share- and bondholdings, the amounts are always known, so no estimate was needed.

All forms of financing meeting the specified criteria are identified, providing the following information for each form of financing:

- Name of the company receiving financing;
- Type of financing (loan, guarantee, share issuance, bond issuance, share ownership, bond ownership, other);
- Total amount;
- Date;
- Purpose (if known);
- For loans and bonds: Maturity and interest rate;
- Name and country of origin of the financial institutions involved;
- Amounts provided by each financial institution.

A full overview of all financial institutions involved in financing the selected nuclear weapons companies is provided in a separate spreadsheet available upon request. In this report, we have focussed on the financial institutions which are found to have the most significant financing relationships with one or more of the selected nuclear weapon companies. To select these financial institutions, the following criteria were used:

- All financial institutions involved in loans and underwriting deals for one or more of the companies since 1 January 2011;
- All financial institutions which own at least 0.5% of the outstanding shares of at least one of the companies.
Details on the loans and underwriting they were involved in since early 2011 and the shareholdings and bondholdings they own or manage (when above 0.5% of the outstanding shares or bonds) in relation to the selected companies, are reported by financial institution.

Definitions

The following definitions are used in this report:

- **Financial institutions**: banks, pension funds, asset managers, insurance companies and other financial institutions from any country in the world;
- **Substantive involvement in financing**: financial institutions can be involved in financing nuclear weapon companies by providing corporate loans, project finance or working capital facilities; by underwriting share and bond issuances; and by (managing) investments in shares and bonds of these companies.
- All loans and underwriting deals since 1 January 2011 are considered to be of substantive importance. Also loans which have been closed before that date but have not yet matured at the time of writing are included.
- Share- and bond holdings at the most recent filing date are considered to be substantive if they cross the threshold of 0.5% of the company’s outstanding shares or bonds.
- **Nuclear weapon companies**: all companies involved in producing or maintaining nuclear weapons or significant, specific components thereof. Which share this activity constitutes of the company’s turnover is not deemed relevant;
Nuclear Weapons Producing Companies

This report identifies 28 companies operating in France, Germany, India, Italy, the Netherlands, the United Kingdom and the United States that are significantly involved in maintaining and modernising the nuclear arsenals of France, India, Israel, the United Kingdom and the United States. This is not an exhaustive list. These companies are providing necessary infrastructure to develop, test, maintain and modernise nuclear weapons. The contracts these companies have with nuclear armed countries are for materials and services to keep nuclear weapons in their arsenals. In other nuclear-armed countries – Russia, China, Pakistan and North Korea – the maintenance and modernization of nuclear forces is carried out primarily or exclusively by government agencies.

Aecom (United States)
Aecom provides professional technical and management support services and is part of the joint venture that manages the Nevada National Security Site (NNSS), previously known as the Nevada Test Site, a key fixture in the US nuclear weapons infrastructure.

Airbus Group (The Netherlands)
In May 2014, EADS (European Aeronautic Defence and Space Company) changed its name to Airbus. It is a Dutch company that produces and maintains submarine-launched nuclear missiles for the French navy, and is part of a joint venture that built nuclear missiles for the French air force.

ATK (United States)
ATK (Alliant Techsystems) produces rocket propulsion systems for Trident II submarine launched ballistic missiles. ATK was also responsible for refurbishing the Minuteman III intercontinental ballistic missiles to keep them operational until at least 2030.

Babcock & Wilcox (United States)
Babcock & Wilcox manages and operates several US nuclear weapons facilities including the Y-12 National Security Complex, Savannah River Site, Kansas City Plant, Los Alamos National Laboratory, Pantex Plant and Sandia National Laboratories each of which are engaged in various aspects of nuclear warhead modernisation.

BAE Systems (United Kingdom)
BAE Systems is involved in the US and UK Trident II (D5) strategic weapons system programmes and US guided missile submarine attack weapons system programmes. It is also the prime contractor for Minuteman III Intercontinental Ballistic Missile (ICBM) system.

Bechtel (United States)
Bechtel manages the Los Alamos and Lawrence Livermore national laboratories in the US, which play an important role in the research, design, development and production of nuclear weapons. It is also involved in the Y-12 National Security Complex in Tennessee where nuclear weapons are produced.

Boeing (United States)
Boeing is involved in the maintenance of the Minuteman III nuclear intercontinental ballistic missiles in the US arsenal. It is responsible for guidance, flight controls, secure codes, weapons systems testing and engineering.

CH2M Hill (United States)
CH2M Hill is one of the joint venture partners in National Security Technologies (NSTec) that manages the Nevada National Security Site (NNSS), previously known as the Nevada Test Site, a key fixture in the US nuclear weapons infrastructure.

Finmeccanica (Italy)
Finmeccanica is involved in the design, development and delivery of two Transporter Erector Replacement Vehicles to support the US Intercontinental Ballistic Missile (ICBM) Minuteman III-fleet.

Fluor (United States)
Fluor is the lead partner responsible for the management and operation of the US Department of Energy's Savannah River Site and Savannah River National Laboratory, the only source of new tritium for the US nuclear arsenal.

GenCorp (United States)
GenCorp is involved in the design, development and production of land- and sea-based nuclear ballistic missile systems for the United States. It is currently producing propulsion systems for Minuteman III and D5 Trident nuclear missiles.
General Dynamics (United States)  
General Dynamics provides a range of engineering, development, and production activities to support US and UK Trident II Strategic Weapons Systems. It is also involved in the guidance systems of the Trident II (D5) nuclear missiles of the US Navy.

Honeywell International (United States)  
Honeywell International supports the manufacturing of detonator assemblies. It is also involved in tritium production at the Savannah River Site and in simulated nuclear testing and the life-extension programme for the US navy’s Trident II nuclear missiles.

Huntington Ingalls Industries (United States)  
Huntington Ingalls Industries is involved in management of the US nuclear arsenal, and tritium production at the Savannah River Site, the only sources of new tritium for the US nuclear arsenal.

Jacobs Engineering (United States)  
Jacobs Engineering Group is involved in the joint venture AWE-ML, which manages the UK Atomic Weapons Establishment, that designs, manufactures and maintains nuclear warheads for the UK.

Larsen & Toubro (India)  
Larsen & Toubro is involved in designing and building the Advanced Technology Vessel, the future nuclear-armed submarine of the Indian navy. It is also responsible for developing the launcher system for the nuclear-capable surface-to-air Akash missile system.

Leidos (United States)  
Leidos (formerly part of SAIC) provides technical and programmatic support for US nuclear weapons maintenance, life extension, and weapons system modifications. It also provides strategic command, control and communications system engineering and technical services in support of the Nuclear C3 System.

Lockheed Martin (United States)  
Lockheed Martin is involved in the production and maintenance of nuclear weapons for both the United States and United Kingdom. Among other things, it is responsible for the production of submarine-launched Trident II D5 nuclear missiles.

Northrop Grumman (United States)  
Northrop Grumman is a joint venture partner responsible for maintaining the Nevada National Security Site (NNSS), previously known as Nevada Test Site. It also provides ongoing support to the Trident II (D5) Underwater Launcher System and Advanced Launcher Development Program for both the US and the UK.

Raytheon (United States)  
Raytheon is involved in a project to stretch the lifecycle of the guidance systems of the Trident II (D5) nuclear missiles of the US Navy. It also has a contract to design a communications system for command and control of nuclear-armed bombers.

Rockwell Collins (United States)  
Rockwell Collins is involved in the US Minuteman Modernization Program Upgrade. The company was selected to improve the satellite communications capacity of the Minuteman Launch Control Centers.

Safran (France)  
Safran is part of a joint venture to build M51 submarine-launched nuclear missiles for the French navy, which each deliver multiple warheads. Its subsidiaries Snecma and Sagem provide the propulsion and navigation systems for these missiles.

Serco (United Kingdom)  
Serco owns a one-third share in the joint venture AWE-ML, which runs the UK Atomic Weapons Establishment. It is responsible for manufacturing and maintaining the nuclear warheads for UK arsenal.

TASC (United States)  
TASC is involved in the research and development for the Solid Rocket Motor Modernization Study of the Minuteman III system for the US arsenal.

Textron (United States)  
Textron designs and builds the US Air Force’s operational inter-continental ballistic missile (ICBM) re-entry vehicles.

Thales (France)  
Thales is part of a joint venture to build the M51 submarine-launched nuclear missiles for the French navy.

ThyssenKrupp (Germany)  
ThyssenKrupp is building the Dolphin submarines for the Israeli army, according to Israeli design specifications, including, according to various media reports, land-attack and cruise missiles capable of carrying nuclear warheads.
URS (United States)

URS is responsible for managing the nuclear and other technically complex operations for the Los Alamos and Lawrence Livermore National Laboratories in the US. URS is also providing electronics systems support for the Trident system for the US Navy.

References


v ASN Bank, written response to Profundo dated 27 May 2014.

vi ASN Bank, written response to Profundo dated 12 May 2014.


xi Philips Pension Fund, written response to Profundo dated 26 May 2014.


xviii PNO Media, written response to Profundo dated 29 April 2014.
EADS renamed itself in 2014 and is now known as Airbus Group.


SNS REAAL, “Who are we?”, SNS REAAL website (http://www.snsreaal.nl/about-us/who-are-we.html), last viewed 6 June 2014.


SNS REAAL, written response to Profundo dated 12 May 2014.

SNS REAAL, written response to Profundo dated 27 May 2014.


Triodos Bank, written response to Profundo dated 27 May 2014.


ABN Amro, written response to Profundo dated 27 May 2014.


ABN Amro, written response to Profundo dated 27 May 2014.


EADS renamed itself in 2014 and is now known as Airbus Group.


BNP Paribas, written response to Profundo dated 22 July 2014.

BNP Paribas, written response to Profundo dated 26 May 2014.
Delta Lloyd, correspondence with Profundo dated 23 May 2014.

Delta Lloyd, “Uitsluitingen Controversiële Wapens, Q1 2014”, Delta Lloyd website (http://www deltalgooydassetmanagement.nl/media/353773/Uitsluitingen%20Controversi%C3%A9le%20Wap ens%20Q1%202014.pdf), 2014.

Delta Lloyd, written response to Profundo dated 23 May 2014.

ING, “Profile”, ING website (http://www.ing.com/About-us/Profile-Fast-facts/Profile.htm), viewed 20 June 2014.


ING, written response to Profundo, dated 5 June 2014.

Pensioenfonds APF, “Over APF”, Pensi


Pensioenfonds Horeca & Catering, written response to Profundo dated 14 May 2014.

EADS renamed itself in 2014 and is now known as Airbus Group.


PGGM, written response to Profundo dated 27 May 2014.

EADS renamed itself in 2014 and is now known as Airbus Group.


Rabobank, written response to Profundo dated 26 May 2014.

clii UniCredit, written response to Profundo dated 28 May 2014.


clv Van Lanschot, written response to Profundo dated 27 May 2014.
