

United States

239 Financial Institutions made an estimated USD\$ 280,885 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 website.

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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 United States

No financial institutions were identified with a clear and comprehensive nuclear weapons exclusion policy.

Runners-up institutions operating in the United States

The Runners-up category provides examples of institutions that have adopted and implemented a 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.ⁱ

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.ⁱⁱ 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).ⁱⁱⁱ

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.^{iv} Regarding the latter, ABN Amro only excludes nuclear weapons producers from non-NATO Member States that have not joined the NPT.^v The exclusion policy "*does not apply to assets managed by external parties for which ABN AMRO has developed a separate engagement strategy*".^{vi}

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

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.

Website:
<http://www.abnamro.com/>

Twitter:
[@ABNAMRO](https://twitter.com/ABNAMRO)

Facebook:
<https://www.facebook.com/abnamro>

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.^{ix}

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*".^x 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.^{xi} 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.^{xii}

The exclusion policy applies to all commercial banking and investment banking activities, as well as to the asset management arm of BNP Paribas.^{xiii} An exception is made for investments made on behalf of third parties and for passively managed funds.^{xiv} The exclusion policy also does not apply to BNP Paribas' external asset managers.^{xv} The exclusion policy covers only new clients and new financing agreements.^{xvi} Existing loan contracts are terminated in cooperation with BNP Paribas' clients within a specific timeframe.^{xvii}

BNP Paribas currently excludes around 90 controversial weapons producers. It does not publish the list.^{xviii}

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

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.^{xi}

According to Commerzbank's policy on the armaments sector, the bank *"does not in any circumstances involve itself in transactions related to controversial weapons"*.^{xx} For a definition of controversial weapons, Commerzbank refers to the German War Weapons Control Act^{xxi}, which provides an elaborate definition of nuclear weapons based on the revised Brussels Treaty of 1954.^{xxii}

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.^{xxiii}

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.^{xxiv}

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

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

Crédit Agricole

Crédit Agricole Group is a French banking group operating in retail, corporate and investment banking and offering special financial services.^{xxvi} With 49 million customers, 7.4 million mutual shareholders and 1.2 million shareholders, Crédit Agricole is one of the leading banks in Europe.^{xxvii}

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.^{xxviii} 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.^{xxix}

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.^{xxx} 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.^{xxxi}

Crédit Agricole uses an exclusion list^{xxxii} based on the findings of external consultants,^{xxxiii} 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](https://twitter.com/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.^{xxxiv} With 46,000 employees^{xxxv} and operations in more than 50 countries, Credit Suisse is one of the world's leading banks.^{xxxvi}

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".^{xxxvii} 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"^{xxxviii}.

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^{xxxix}.

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:
<https://www.credit-suisse.com/>

Twitter:
[@CreditSuisse](https://twitter.com/CreditSuisse)

Facebook:
<https://www.facebook.com/creditsuisse>

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.^{xl} ING serves over 47 million private, corporate and institutional customers from more than 40 countries. It employs over 75,000 people worldwide.^{xli}

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.^{xlii}

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.^{xliii} 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.^{xliv} ING requires that its external asset managers apply the exclusion policy to their discretionary mandates.^{xlv}

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

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

Nordea

Nordea is the largest financial services group in northern Europe. It offers private, retail, corporate, and institutional banking products, as well as life and pension products. Nordea serves approximately 10 million households and around 0.5 million corporate customers.^{xlvii}

As of 2012, Nordea has excluded companies that contribute to the development or manufacture of new nuclear weapon programs, including delivery systems that are specifically designed for nuclear weapons.^{xlviii} The decision to exclude nuclear weapons producers is in line with Nordea's 2010 policy on illegal weapons.^{xlix} Nordea's policy does not exclude companies that are involved in already developed nuclear weapons. Companies that contribute to the maintenance of new nuclear weapon programs are also not excluded.ⁱ

Nordea's exclusion policy applies to all asset management activities, except for its passively managed funds. External asset managers are informed about companies that breach international norms and encouraged to implement Nordea's Policy for Responsible Investment.ⁱⁱ Nordea does not apply the exclusion policy to its commercial banking activitiesⁱⁱⁱ, nor to its investment banking activities.ⁱⁱⁱⁱ

Nordea's exclusion list currently contains 11 companies involved in nuclear weapons: Babcock International, BAE Systems, EADS^{lv}, Finmeccanica, General Dynamics, Hanwha Corporation, Lockheed Martin, Northrop Grumman, Rolls-Royce, Safran and United Technologies.^{lv} The exclusion list is based on the findings of data provider Ethix SRI Advisors.^{lvi}

We commend Nordea for having a nuclear weapons policy. For a place in the Hall of Fame, Nordea should strengthen its policy to cover companies involved in nuclear weapon maintenance and modernisation. Furthermore, the policy should apply to Nordea's commercial banking and investment banking activities and to its passively managed funds. In addition, the external asset managers should be required to apply Nordea's policy. We encourage Nordea to further strengthen the policy, so that it may be listed in the Hall of Fame in a future update of this report.

Website:	Twitter:	Facebook:
www.nordea.com/	@Nordea	https://www.facebook.com/Nordea

Rabobank

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.^{lvii} Rabobank has over 56,000 employees worldwide.^{lviii}

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.^{lix} Involvement includes the development, manufacture, maintenance and selling of nuclear weapons and of delivery systems that are specifically designed for nuclear weapons.^{lx}

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

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.^{lxiv} The exclusion list of Rabobank, which is based on external research, is not publicly available.^{lxv}

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

RBC

The Royal Bank of Canada (RBC) is one of Canada's largest banks and provides personal and commercial banking, wealth management, insurance, investor services and capital markets products and services around the globe. The bank serves more than 16 million personal, business, public sector and institutional clients in 44 countries.^{lxvi}

RBC does not provide financial services to companies involved in the development, production and trade in nuclear weapons and delivery systems that are specifically designed for these weapons.

The policy applies to corporate credit granting and project finance.^{lxvii} RBC also terminates existing loan contracts with nuclear weapons producers on a case-by-case basis. The bank has an exclusion list for certain countries, but the potential exclusion of companies is discussed on a case-by-case basis.^{lxviii}

RBC is currently reviewing its weapons policy and consideration is being given to expanding the scope to its investment banking and asset management activities. RBC will also consider extending its policy to exclude companies involved in the maintenance of weapons of mass destruction.^{lxix}

We commend RBC for having a nuclear weapons policy. For a place in the Hall of Fame, RBC should apply its exclusion policy to investment banking and asset management activities. Moreover, companies involved in nuclear weapons maintenance and modernisation should be excluded. We look forward to assessing RBC's update of its nuclear weapons policy. We encourage RBC to further strengthen the policy, so that it may be listed in the Hall of Fame in our next report.

Website:	Twitter:	Facebook:
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SEB

SEB is the leading corporate and investment bank in the Nordic countries, serving large corporations and financial institutions with corporate banking, trading and capital markets and global transaction services. SEB also provides about 4 million individual customers with financial advice and services for among others savings, loans, pension solutions and life insurance.^{lxx}

In the second half of 2013, SEB decided to no longer invest in companies involved in the development and manufacture of nuclear weapons.^{lxxi} Consequently, the bank divested from all investment holdings in these companies.^{lxxii}

The exclusion policy currently applies to all investments made on SEB's own account and to its actively managed funds, but the bank is working on an update of its nuclear weapons policy that may feature more asset management categories, both managed internally and externally. SEB has already taken the decision to exclude nuclear weapons from its passively managed funds, but it is still implementing this in practice.^{lxxiii}

SEB is looking into the possibilities of expanding the policy to its commercial banking and investment banking activities. The bank is also assessing whether to exclude companies involved in the maintenance and trade of nuclear weapons, as well as companies with activities related to delivery systems that are specifically designed for nuclear weapons.^{lxxiv} SEB's exclusion list currently contains 12 companies with activities related to nuclear weapons: Babcock International, BAE Systems, EADS^{lxxv}, Finmeccanica, General Dynamics, Huntington Ingalls Industries, Larsen & Toubro, Lockheed Martin, Northrop Grumman, Rolls Royce Holding, Safran and United Technologies.^{lxxvi} The exclusion list is based on the findings of data provider Ethix SRI Advisors.^{lxxvii}

We commend SEB for having a nuclear weapons policy. To be listed in the Hall of Fame, SEB should exclude companies involved in the maintenance of nuclear weapons and companies with activities related to specifically designed delivery systems. Furthermore, SEB's policy should cover commercial banking and investment banking activities and should be applied to all financial products. We look forward to assessing SEB's updated nuclear weapons policy and we encourage SEB to further strengthen the policy, so that it may be listed in the Hall of Fame in our next report.

Website:
<http://sebgroup.com/>

Twitter:
@SEBGroup

Facebook:
<https://www.facebook.com/sebsverige>

Swedbank

Swedbank is a Sweden's largest financial institution serving 8 million private customers and over 600,000 corporate and organisational customers. Swedbank also has a leading position in Estonia, Latvia and Lithuania.^{lxxviii}

Swedbank's Position Paper on Defence Equipment outlines that "Swedbank applies a zero tolerance principle for financial services to customers belonging to a Group that is manufacturing, modernising, selling or buying nuclear weapons".^{lxxix} If a company decides to get involved in nuclear weapons, Swedbank does not terminate existing loan contracts. However, a renewal of loans falls under the restrictions of the Position Paper and is not allowed.^{lxxx} Swedbank Robur, the asset manager of Swedbank, has implemented a policy that prohibits investment in nuclear weapons producers.^{lxxxi}

Swedbank now also divests from investment holdings in nuclear weapons producers.^{lxxxii} The policy applies to all asset management categories, except for investments made on behalf of third parties.^{lxxxiii} Swedbank also excludes nuclear weapons producers from its index funds. It is currently adjusting its index funds to ensure no nuclear weapons producers are featured.^{lxxxiv} As Swedbank Robur has mainly internal asset managers, it has so far not focused on engagement with external fund-of-fund managers. However, it plans to engage with these in the future.^{lxxxv}

Swedbank Robur's published exclusion list contains 11 companies involved in nuclear weapons: Babcock & Wilcox, Babcock International, Airbus, GenCorp, Jacobs Engineering, Motovilikhinski Zavody, Northrop Grumman, Raytheon, Safran, Serco and United Technologies.^{lxxxvi} The list is based on information from external research providers Global Engagement Services (GES) and Ethix SRI Advisors.^{lxxxvii}

We commend Swedbank for having a nuclear weapons policy. We welcome the decision by Swedbank to divest from investment holdings in nuclear weapons producers. For a place in the Hall of Fame, the bank should also apply its policy to all asset management categories, and terminate existing loan contracts with nuclear weapons producers. We encourage Swedbank to further strengthen the policy, so that it may be listed in the Hall of Fame in our next report.

Website:
www.swedbank.se/

Twitter:
[@Swedbank](https://twitter.com/Swedbank)

Facebook:
<https://www.facebook.com/swedbanksverige>

UniCredit

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

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".^{xc} 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".^{xc} Although it is not clearly stated in the Position Statement, according to the bank's 2007 Sustainability Report UniCredit excludes any involvement with nuclear weapons producers.^{xcii}

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.^{xciii}

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

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](https://twitter.com/UniCredit_PR)

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.

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For more information on the investments per financial institutions, please look in the full report

Financial institution	Investment in million US\$
Abrams Bison Investments	280
Adage Capital Management	864
Addison Clark Management	41
Advisors Asset Management	20
Aetna	5
Affiliated Managers Group	726
Aflac	139
AJO	669
Allstate Corporation	196
Alyeska Investment Group	52
Amalgamated Bank of Chicago	29
American Century Companies	1.420
American Family Mutual Insurance	187
American Financial Group	5
American International Group	1.032
American National Financial Group	6
American National Insurance	51
American United Mutual Insurance	83
Ameriprise Financial	3.047
Ameritas Mutual	9
Anchor Financial & Accounting	24
AQR Capital Management	310
Argent Financial	61
Arovid Associates	149
Artisan Partners	602
Associated Banc-Corp	29
Atlanta Life Financial	147
Auto-Owners Insurance	20
BancPlus	29
Bank of America	17.990
Bank of New York Mellon	4.787
Banner Bank	29
BB&T Corporation	280
Beck, Mack & Oliver	108
Becker Capital Management	21
Bessemer	80
BlackRock	24.792

Blue Cross Blue Shield Association	8
Blue Harbour Group	228
BlueMountain Capital Management	27
Boston Mutual Life Insurance	5
Boston Private Financial	162
Brown Advisory	552
Calamos Asset Management	36
California First National Bancorp	29
California Public Employees' Retirement System	88
Capital Group	27.348
Capital One Financial Corporation	46
Capstone Investment Advisors	11
Carlson Capital	13
Carlyle Group	144
Cascade Bancorp	29
Central Pacific Financial Corporation	29
Century Operating Corporation	54
Charles Schwab	147
Chesapeake Partners Management	30
Chubb	25
Citadel Group	88
Citigroup	12.380
City National Corporation	160
CNO Financial	66
Comerica	367
Country Trust Bank	19
Cowen	56
Creative Solution Services	13
Crestview Partners	6
D.E. Shaw & Co.	279
D.F. Dent & Company	79
Davis Advisors	197
DePrince Race & Zollo	86
Dimensional Fund Advisors	666
Discovery Capital Management	263
Drexel Hamilton	86
Earnest Partners	102
Eastern Bank	29
Eaton Vance	564
Epoch Investment Partners	826
Evercore	11.176
Farallon Capital Management	102
Ferguson Wellman Capital Management	40
Fidelity Investments	6.873
Fifth Third Bancorp	178

First Eagle Investment Management	1.409
First Manhattan	103
First Niagara Financial	29
First Pacific Advisors	26
First Trust Advisors	101
Franklin Resources	4.496
Gamco Investors	674
GenCorp, Inc. Retirement Savings Plan	48
General Electric	331
Genworth Financial	88
Geode Capital Management	2.615
Glenhill Capital Management	31
Glenview Capital Management	115
Goldman Sachs	5.060
Gosha Trading	20
Gotham Asset Management	66
Grantham, Mayo, Van Otterloo	221
Greenlight Capital	136
Guardian Life Insurance Company of America	36
Guggenheim Capital	111
Hancock Holding	32
Hartford Financial Services	104
Hirzel Capital Management	47
Hotchkis & Wiley	13
Huntington Bancshares	1.615
Illinois Mutual Life Insurance	5
Impala Asset Management	123
International Value Advisors	77
Invesco	4.928
IONIC Capital Management	54
Jacobs Levy Equity Management	37
Jana Partners	386
Janus Capital Group	1.859
JPMorgan Chase	16.272
Kansas City Life Insurance Group	5
Keeley Asset Management	41
Kennedy Capital Management	13
Keycorp	96
Kingstown Capital Management	106
Knights of Columbus	21
Kohlberg Kravis Roberts & Co	154
Lawson Kroeker Investment Management	6
Lazard	471
Legg Mason	1.388
Liberty Mutual Insurance	54

Lincoln National Corporation	476
LionEye Capital Management	25
Lodge Hill Capital	22
Loews Corporation	55
Longview Asset Management	3.888
Loop Capital	18
Lord, Abbett & Co	368
LSV Asset Management	1.063
Luminus Management	21
Lyrical Partners	49
M&T Bank Corporation	108
Madison Investment	121
Manning & Napier	87
Marsico Capital Management	396
MassMutual Financial	780
Matthews International Capital Management	41
Mayo Capital Partners	18
Mercator Asset Management	140
MetLife	150
MFP Investors	15
Millennium Management	28
Mischler Financial Group	86
Modern Woodmen of America	15
Morgan Stanley	6.641
National Financial Partners	21
National Life Group	23
Nationwide	42
Neuberger Berman	1.337
New Jersey Department of the Treasury	119
New Mountain Capital	53
New York Life Insurance Company	1.159
New York State Common Retirement Fund	71
Newsouth Capital Management	85
Northern Trust	4.437
NorthPointe Capital	9
Northwestern Mutual Life Insurance	623
Och-Ziff Capital Management Group	226
Ohio National Mutual	15
Ohio Public Employees Retirement System	8
Oppenheimer Holdings	31
Opus Capital Management	18
Pacific Mutual	103
Peconic Partners	61
Pekin Singer Strauss Asset Management	5
Pennant Capital Management	48

People's United Financial	29
Piper Jaffray	80
PNC Financial Services	638
Point72 Asset Management	46
Poplar Forest Capital	20
Primecap	1.668
Principal Financial	344
Protective Life Corp	103
Prudential Financial	2.554
Pzena Investment Management	88
Raymond James Financial	52
RE Investment Corporation	54
Regions Financial	73
Reinhart Partners	28
Renaissance Technologies	168
Royal Capital Management	11
Ruane, Cunniff & Goldfarb	381
Sammons Enterprises	48
Sanders Capital	219
Sasco Capital	234
Schafer Cullen Capital Management	302
Seizert Capital Partners	26
Sentry Insurance	10
Shelter Mutual Insurance	8
Silverback Asset Management	10
Silvercrest Asset Management	38
Skytop Capital Management	9
Smith Asset Management Group	29
Snow Capital Management	60
StanCorp Financial	8
Starboard Value	119
State Farm	252
State Street	28.493
Steel Partners Holdings	80
Stifel Financial	29
Sunrise Partners	8
SunTrust Banks	1.305
Symetra Financial	186
Synovus Financial Corporation	334
T. Rowe Price	8.543
The London Company of Virginia	182
The Phoenix Companies	7
The Travelers Companies	63
Thrivent Financial	202
TIAA-CREF	3.354

Tiger Management	15
Trimaran Capital Partners	13
Trust Investment Advisors	152
Two Sigma Investments	232
United Fire Group	5
Unum Group	280
US Bancorp	3.610
ValueAct Holdings	939
Vanguard	21.926
Viking Global Investors	424
Voya Financial	63
W.T.B. Financial	21
Waddell & Reed Financial	719
Water Street Capital	16
Wedge Capital Management	230
Wellington Management	6.668
Wells Fargo	5.666
Western & Southern Mutual	132
William Blair & Company	98
Williams Capital Group	391
Winslow Asset Management	21
Woodmen of the World and/or Omaha Woodmen Life Insurance Society	9

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 to US and UK Trident II

Strategic Weapons Systems. It is also involved in the 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 a 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.

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