

SWEDEN'S INSTITUTIONAL INVESTMENT INTO CHINESE BAD ACTORS

Elias Sköld, Prague Security Studies Institute
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SUMMARY AND OVERVIEW - SWEDEN'S INSTITUTIONAL INVESTMENT INTO CHINESE BAD ACTORS

FINANCIAL INSTITUTION	Handelsbanken	Swedbank	SEB	Länsförsäkringar	Nordea	AMF
FUND TYPE/FOCUS						
GLOBAL FUND	Handelsbanken Global Index Criteria	Swedbank Robur Globalfond	SEB Global Exposurefond	Länsförsäkringar Global Index	Nordea Stratega 35	AMF Aktiefond Världen
EMERGING MARKETS FUND	Handelsbanken Emerging Markets Index	Swedbank Robur Global Emerging Markets	SEB Emerging Markets Exposurefond	Länsförsäkringar Tillväxtmarknad Index	Nordea Emerging Markets Enhanced Equity Fund	AMF Aktiefond Tillväxtmarknader
ASIA FUND	Handelsbanken Asien Tema	Swedbank Robur Access Asien	SEB Asienfond ex Japan	Länsförsäkringar Asienfond	Nordea Kinafond	AMF Aktiefond Asien Stilla havet

LIGHT GREEN: CLEAR

DARK ORANGE:
HOLDS DIRECTLY SANCTIONED COMPANIES

LIGHT ORANGE:
HOLDS INDIRECTLY* SANCTIONED COMPANIES

* - Indirectly sanctioned companies refers to companies with direct ties to sanctioned companies through their ownership structure, such as parent companies or subsidiaries of sanctioned companies.

PSSI has investigated 18 select funds from some of **Sweden's largest financial institutions** to uncover the extent to which these invest in directly or indirectly* sanctioned companies, cumulatively referred to as *bad actor companies*.

These companies are overwhelmingly sanctioned due to **national security concerns** through ties to the Chinese military or facilitating **human rights abuses** against ethnic minorities in China.

Four such funds are channeling Swedish investments into directly sanctioned companies, while a further five invest into indirectly sanctioned companies.

In total, over **\$70 million dollars** have been invested into bad actor companies, including over **\$14 million dollars into directly sanctioned companies**.



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SANCTIONS LIST OVERVIEW

Commerce BIS Entity List (BIS Entity List)

A U.S. Department of Commerce list, compiled by the Bureau of Industry and Security (BIS), including foreign individuals, companies, and entities restricted from accessing U.S.-origin items due to involvement in activities contrary to national security or foreign policy interests.

Uyghur Forced Labor Prevention Act Entity List (UFLPA List)

A U.S. Customs and Border Protection list identifying companies using forced labor from Xinjiang, triggering import bans under the UFLPA legislation.

DoD List of Chinese Military Companies Operating in the United States (1260H List)

A U.S. Department of Defense list, also known as the 1260H list, referring to Section 1260H of the National Defense Authorization Act, identifying entities associated with China's military-industrial complex or military-civil fusion strategy.

Treasury OFAC SDN List (SDN List)

A U.S. Department of the Treasury's list, compiled by the Office of Foreign Assets Control (OFAC), including individuals, entities, and vessels subject to sanctions due to their involvement in terrorism, narcotics trafficking, weapons proliferation, human rights abuses, or other activities threatening U.S. national security or foreign policy.

Treasury OFAC Chinese Military-Industrial Complex Companies List (CMIC List)

A U.S. Treasury Department list targeting companies linked to China's military, requiring U.S. persons to divest from or avoid investments in these entities under E.O. 13959 and related amendments.



INVESTMENT VALUES BY FINANCIAL INSTITUTION

FINANCIAL INSTITUTION	FUND NAME	ALL BAD ACTORS INVESTMENT VALUE	FINANCIAL INSTITUTION TOTAL ALL BAD ACTORS INVESTMENT VALUE	DIRECTLY SANCTIONED INVESTMENT VALUE
Handelsbanken	Handelsbanken Global Index Criteria	\$ 29.78	\$ 43.2	\$ 10.05
	Handelsbanken Emerging Markets Index	\$ 12.51		\$ 1.414
	Handelsbanken Asien Tema	\$ 0.91		
Swedbank	Swedbank Robur Access Asien	\$ 11.18	\$ 11.18	
SEB	SEB Global Exposure Fund (SEB Global Indexnära)	\$ 2.98	\$ 4.98	
	SEB Emerging Markets Exposure Fund (SEB Emerging Markets Indexnära)	\$ 1.8		\$ 0.53
	SEB Asienfond ex Japan	\$ 0.197		
Länsförsäkringar	Länsförsäkringar Tillväxtmarknad Index	\$ 10.74	\$ 10.74	\$ 2.17
Nordea	Nordea Emerging Markets Enhanced Equity Fund	\$ 2.55	\$ 2.55	
All values in Millions		Total:	\$ 72.64	\$ 14.16



SANCTIONS LIST NAME	FINANCIAL INSTITUTION	ALL BAD ACTORS INVESTMENT VALUE	DIRECTLY SANCTIONED INVESTMENT VALUE	SANCTIONS LIST TOTAL ALL BAD ACTORS INVESTMENT VALUE	SANCTIONS LIST TOTAL DIRECTLY SANCTIONED INVESTMENT VALUE
Commerce BIS Entity List	Handelsbanken	\$ 22.09	\$ 8.94	\$ 28.42	\$ 10.7
	Swedbank	\$ 1.74			
	SEB	\$ 1.58	\$ 0.43		
	Länsförsäkringar	\$ 3.02	\$ 1.34		
Uyghur Forced Labor Prevention Act Entity List	Handelsbanken	\$ 1.43	\$ 1.43	\$ 1.65	\$ 1.65
	SEB	\$ 0.17	\$ 0.17		
	Länsförsäkringar	\$ 0.06	\$ 0.06		
DoD List of Chinese Military Companies Operating in the United States	Handelsbanken	\$ 28.56	\$ 2.9	\$ 46.12	\$ 3.91
	Swedbank	\$ 7.76			
	SEB	\$ 2.1			
	Länsförsäkringar	\$ 6.98	\$ 1.01		
	Nordea	\$ 0.72			
Treasury OFAC SDN List	Handelsbanken	\$ 0.26		\$ 6.95	
	Swedbank	\$ 1.67			
	SEB	\$ 1.44			
	Länsförsäkringar	\$ 1.74			
	Nordea	\$ 1.83			
Treasury OFAC Chinese Military-Industrial Complex Companies List	Handelsbanken	\$ 15.34	\$ 0.03	\$ 20.51	\$ 0.03
	Swedbank	\$ 4.72			
	SEB	\$ 0.43			

INVESTMENT VALUES BY SANCTIONS LIST

WHO ARE THESE DIRECTLY SANCTIONED COMPANIES?

COMPANY NAME	TICKER	ABOUT THE COMPANY	SANCTIONS LIST
360 Security Technology	SHA: 601360	A cybersecurity and artificial intelligence firm, sanctioned due to its links to China's military-industrial complex and involvement in cyber-related security threats.	1260H List
BGI Genomics	SHE: 300676	A leading biotech and genomics firm, sanctioned for its involvement in mass DNA collection and surveillance programs linked to human rights abuses in Xinjiang.	1260H List
Cambricon Technologies	SHA: 688256	A semiconductor and AI chip design company, sanctioned due to its close ties to China's military and supporting its modernization efforts, particularly in AI-driven defense systems.	BIS Entity List
CRRC Corp Ltd	SHA: 601766 HKG: 1766	The world's largest rail equipment manufacturer, sanctioned for its involvement in China's military logistics, technological development, and funding, as well as China's military-civil fusion strategy.	1260H List
FiberHome Telecommunication Technologies	SHA: 600498	A telecommunications company, sanctioned for providing surveillance and communication technology used in human rights abuses and military applications.	BIS Entity List
Guangzhou Haige Communications Group	SHE: 002465	A defense and communications technology company, sanctioned for its contributions to China's military command and control systems.	BIS Entity List
Hygon Information Technology	SHA: 688041	A semiconductor firm specializing in high-performance computing, sanctioned for its collaboration with Chinese military-affiliated institutions.	BIS Entity List
Iflytek	SHE: 002230	A leading AI and voice recognition company, sanctioned for developing surveillance and biometric technologies used in the repression of Uyghurs and other minority groups in Xinjiang.	BIS Entity List
Ninestar	SHE: 002180	An electronics and printing company, sanctioned for its links to forced labor in Xinjiang and supply chain concerns related to human rights violations.	UFLPA List
SenseTime Group	HKG: 0020	A major AI company specializing in facial recognition, sanctioned for providing technology used in China's mass surveillance and repression campaigns, particularly in Xinjiang.	1260H List, CMIC List
Xinjiang Daqo New Energy Co	SHA: 688303	A polysilicon producer, sanctioned for its involvement in forced labor programs tied to the Xinjiang region's solar supply chain.	UFLPA List, BIS Entity List
Zhejiang Dahua Technology	SHE: 002236	A surveillance technology company, sanctioned for supplying facial recognition and AI-powered security systems used in human rights abuses in Xinjiang.	1260H List, BIS Entity List





WHO ARE THESE INDIRECTLY SANCTIONED COMPANIES? (ILLUSTRATIVE SELECTION)

COMPANY NAME	TICKER	ABOUT THE COMPANY	RELATION TO SANCTIONED ENTITY	SANCTIONS LIST
ZTE	SHE: 000063 HKG: 0763	A state-backed telecommunications giant with deep ties to China's military-industrial complex. It has been sanctioned multiple times by the US for violations, including aiding North Korea and Iran. It has also been linked to surveillance and repression in Xinjiang.	ZTE is parent to a sanctioned subsidiary, ZTE Parsian. ZTE is itself jointly controlled by CASC and CASIC, which appoint 5 of 9 directors. Both CASC and CASIC are on sanctions lists due to their close ties to the Chinese military.	ZTE Parsian - BIS Entity List; CASIC - CMIC List, 1260H List; CASC - BIS Entity List.
China Greatwall Technology	SHE: 000066	China Greatwall Technology is a highly integrated player in China's defense industry, developing technology for military data management, tactical communication networks, and military warning systems. Its military contracts include delivering satellite terminal equipment to the Chinese Central Military Commission.	China Greatwall Technology is part of the state-owned defense group CEC, a key producer of military electronics which plays a crucial role in China's military and security infrastructure.	China Electronics Corporation (CEC) is on the DoD 1260H List and the OFAC CMIC List.
China National Software & Service Co.	SHA: 600536	China National Software & Service Co. designs, develops, and integrates software for strategic sectors, including defense.	The company is owned by CEC, a state-owned defense conglomerate.	
Inspur Electronic Information Industry Co.	SHE: 000977	A key supplier to the PLA, developing AI and cloud computing technologies that support China's military modernization and surveillance apparatus.	A part of Inspur Group, which has been sanctioned by the U.S. for its involvement in China's defense sector.	Inspur Group is on the DoD 1260H List, BIS Entity List, and the OFAC CMIC List.
Zhuzhou CRRC Times Electric	SHA: 688187 HKG: 3898	Zhuzhou CRRC Times Electric is involved in China's military-industrial complex, developing cutting-edge weapons systems such as electromagnetic railguns for the PLA Navy.	A subsidiary of CRRC, which supplies technology to China's military and supports military logistics. CRRC actively contributes to China's military-civil fusion strategy, and has been implicated in Uyghur forced labor.	CRRC is on the DoD 1260H List.
China National Nuclear Power	SHA: 601985	China National Nuclear Power is a subsidiary of China's main nuclear weapons builder.	A subsidiary of China National Nuclear Corporation (CNNC), which oversees China's nuclear weapons program, produces nuclear fuel for China's strategic forces, and powers Chinese military facilities, including in the South China Sea.	CNNC is on the OFAC CMIC List, and the DoD 1260H List.
CNOOC Energy Technology & Services	SHA: 600968	CNOOC Energy Technology & Services is a subsidiary of China National Offshore Oil Corporation (CNOOC), which has been sanctioned by the U.S. for its ties to China's military.	A subsidiary of CNOOC, which is on multiple sanctions lists over assisting Chinese military activities in the South China Sea and contributing to human rights abuses through its business practices.	CNOOC is on the DoD 1260H List, OFAC CMIC List, and the BIS Entity List.