

ACT RESPONSIBLY: STOP INVESTING IN GENOCIDE

June 30, 2026

Dear Councillor,

We write regarding agenda item 6 of the Wolverhampton Pension Committee meeting on 1 July 2026 and to remind you, as trustees and shareholders of the LGPS, of the UK's obligations with respect to the prevention and non-assistance of genocide under international law, that are legally relevant to the investment decisions of administering authorities. The Secretary of State, Alison McGovern, did not address these matters in her reply on the 12 May 2026 to the Local Authority Pension Scheme Advisory Board but that does not absolve you of your responsibilities and duties as set out in the position paper prepared by Doughty Street Chambers on 27 August 2025.

A report in June 2025 to the UN from the 'Special Rapporteur on the situation of human rights in the Palestinian territories occupied since 1967' investigated how global corporate interests underpin the Israeli settler-colonial twofold logic of displacement and replacement, aimed at dispossessing and erasing Palestinians from their lands.

The report pulls no punches in stating that the financial sector channels critical funding to both State and corporate actors complicit in Israel's illegal occupation and its apartheid state. This is despite many companies in the sector committing to the Principles for Responsible Investment and the UN's 'Guiding Principles' on Business and Human Rights'. The Report found that Sovereign wealth and pension funds are 'significant financiers' in 'enabling' and 'sustaining' the illegal occupation of the Palestinian Occupied Territories.

An independent United Nations (UN) commission of inquiry in September 2025 concluded that Israel has committed genocide against Palestinians in Gaza and that four of the five genocidal acts defined under international law have been carried out since the start of the war with Hamas in 2023.

Since the "ceasefire" came into effect on 10 October 2025, Israeli forces have reportedly committed more than 3,000 violations, killed at least 1,005 Palestinians and injured 3,157 others, according to the Palestinian Ministry of Health in Gaza.

An independent UN commission of inquiry earlier this month (June 2026), found that Israeli forces deliberately targeting children is one of the key elements in establishing genocidal intent of the Israeli authorities, and security forces intent to destroy the Palestinian group, in whole or in part, in Gaza. We draw your attention particularly to section VII.

Despite the overwhelming level of evidence of Israel's atrocities and crimes against humanity, the West Midlands Pension Fund - that purports to adhere to UN's Guiding Principles' on Business and Human Rights to 'prevent harm' in supply chains, it and this administrative authority, continue to pay lip service to its own Responsible Investment policies and commitments whilst at the same time failing to take action as set out in the position paper to prevent well documented breaches of Human Rights in the supply chains of the companies of concern complicit with the ongoing genocide of the Palestinian people.

RESPONSIBLE INVESTMENT?

The officer's report for agenda item 6 does not provide full information, namely:

The report does not provide members with options for excluding "companies of concern" at such an early stage where assets are now being transferred and re-structured to the Central Pool as other pool's have done.

Whilst we welcome the fact that the fund signed an investor letter calling on Lockheed Martin, Northrop Grumman, Boeing, RTX and General Dynamics, to strengthen human rights policies, and signed an investor letter to Thales ahead of its 2026 Annual General Meeting, it omits the fact that LAPFF have reported in recent quarterly reports that: human rights impact assessments are 'not being carried out'; that broader disclosures remain limited; that companies do not consistently apply human rights 'due diligence' across the business, or if they do, fully evaluates how its commercial decisions may lead to harm.

In response to the officer's report, we invite committee members to address the following issues:

ASSET TRANSFER EXCLUSIONS

The London CIV pool is offering funds three exclusion/restriction options, so called pillars, in the re-structuring of assets following transfer. Regarding the transfer of assets from WMPF to the Central Pool, will there be a similar framework of opportunities to exclude companies supplying to arms and weaponry to the IDF and trading with illegal Israeli settlements where they breach international law?

FAILING TO ENGAGE

Given that Caterpillar, RTX Corp, BAE Systems, Lockheed Martin, and Thales have not responded to engagement in any serious or meaningful way since they were first reported in an officers' report in June 2024, will they be now excluded without any further delay and if not why not (section 3.3)?

MOTOROLA

To clarify which as to which 'regions' Motorola has or is considering withdrawing from, does this include the Occupied Palestinian Territories and from and what formal sanctions it anticipates? (Section 3.16).

We look forward to your response.

Yours Sincerely

Simon Cardy, on behalf of Wolverhampton Palestine Solidarity Campaign

Clive Dixon, Chair Coventry Palestine Solidarity Campaign.

Naeem Malik, Chair West Midlands Palestine Solidarity Campaign.