

# LONG SHADOWS

How the Global  
Economy Supports  
Oppression in Xinjiang



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innovation for peace

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**Cover Art**

C4ADS was proud to commission a Uyghur artist to create the cover art and internal illustrations for this report. While they wish to remain anonymous, we are grateful for the opportunity to share their work.

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# EXECUTIVE SUMMARY

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Companies perpetrating forced labor and human rights abuses in the Xinjiang Uyghur Autonomous Region (Xinjiang) are enmeshed in global trade and finance. This is a result of their integration with the corporate, trade, and financial landscape within Xinjiang, China, and the greater region. This report uses the Xinjiang Production and Construction Corps (XPCC)<sup>1</sup>—a regional governing body with a vast commercial network—as a test case to better understand how perpetrators of human rights abuse in Xinjiang retain access to international markets. Analysis of publicly available information reveals that sanctions and international outrage have been insufficient in preventing the XPCC from accessing global markets, allowing it to continue profiting from forced labor and other forms of oppression.

The XPCC is a regional governing body in Xinjiang with a vast economic empire. It is a direct perpetrator of mass detention and forced labor of Uyghur and other minority peoples in the region, and for this reason, it was sanctioned by both the United States in July 2020 and the European Union in March 2021. Additionally, the United States banned Xinjiang cotton and tomato products—two of the XPCC's key agricultural outputs—from entering the country due to their association with forced labor. C4ADS mapped the XPCC's majority-owned subsidiaries and used publicly available information to map the extent to which, despite

these actions, the XPCC remains connected to the global economy. **Through this analysis, C4ADS found that the XPCC has continued to engage in economic activity through the following mechanisms:**

**Trade:** The XPCC engages in domestic and regional trade, which, in turn, feeds into global supply chains. This trade, which often flows through Central Asia and Russia, involves products deemed by the US government to be high risk for forced labor, such as cotton and tomato products. C4ADS identified numerous US and global retailers and intermediary suppliers, including well-known brands, that may be using XPCC products.

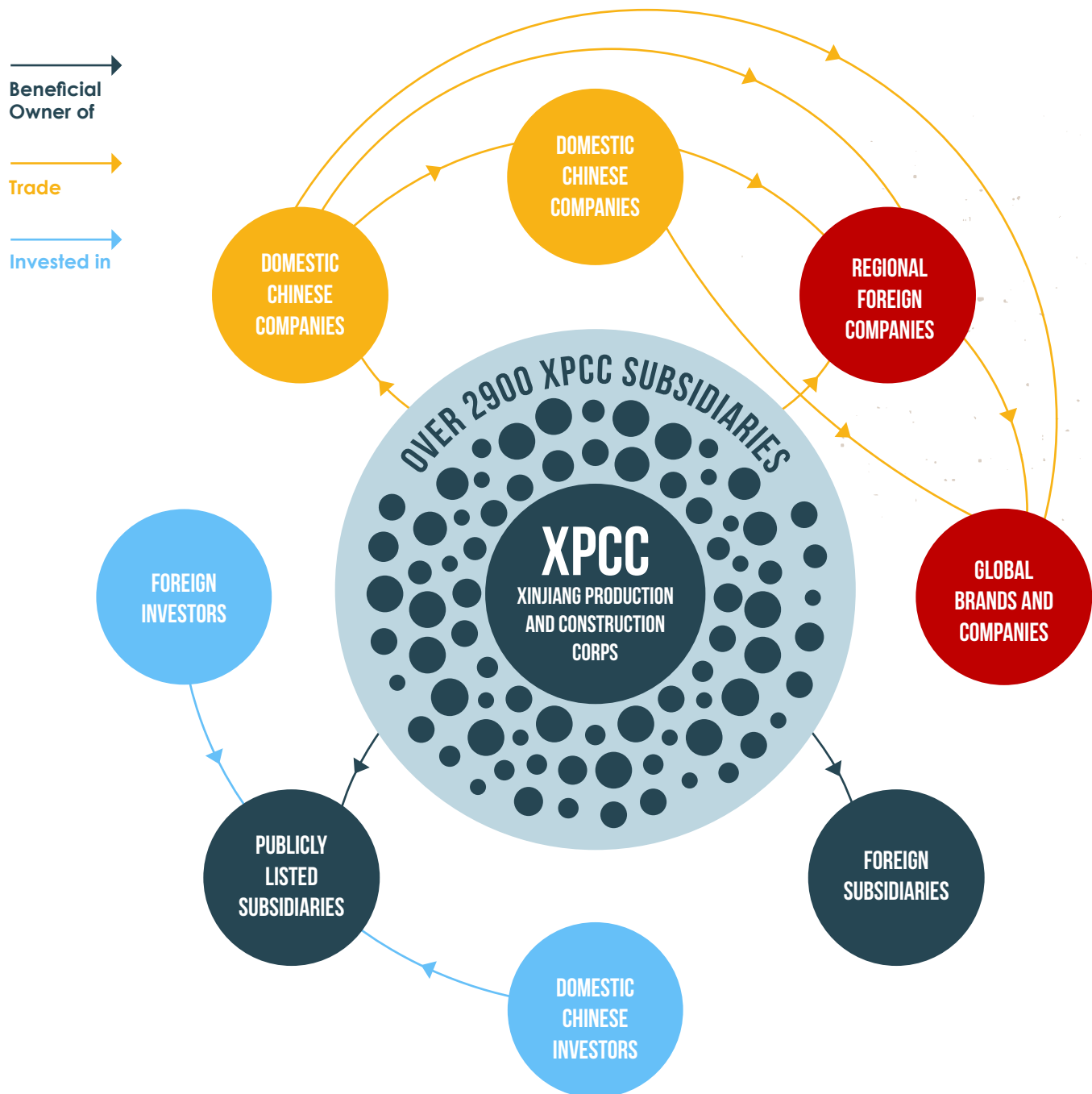
**Foreign Subsidiaries:** The XPCC is connected to regional development and economic activity through its foreign subsidiaries. In particular, these subsidiaries are often contracted by regional governments and the Asian Development Bank to carry out development-related activities in Central Asia.

**Financial Markets:** Through its publicly traded subsidiaries, the XPCC is integrated with and supported by Chinese financial markets. Foreign investors, including major US and Western banks and financial institutions, are invested in XPCC companies through these markets.



The XPCC's continued engagement with the international economy demonstrates that standalone private sector or enforcement actions cannot fully remove companies implicated in human rights abuse from global supply chains. This is particularly true when such actions are divorced from political or economic context. Instead, stakeholders from across

government, industry, the financial sector, and civil society must acknowledge the critical role of domestic and regional political economies in supporting forced labor and abuse in Xinjiang and adapt by using novel data and methodologies to implement effective action.



# GLOSSARY

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## BCI

The Better Cotton Initiative is a global cotton accreditation program that promotes environmentally- and ethically-produced cotton.<sup>2 3</sup>

## CCP

The Chinese Communist Party is the governing political party in China.

## CBP

US Customs and Border Protection is a US federal law enforcement agency with an anti-forced labor mission. CBP issues Withhold Release Orders (WROs) (see below).

## MAJORITY-OWNED XPCC COMPANIES LIST

A C4ADS-generated list of companies majority-owned by the XPCC or its subsidiaries.

## OFAC

The US Office of Foreign Assets Control is a part of the US Department of the Treasury and implements sanctions, including those targeted at entities responsible for committing human rights violations.

## SASAC

A State-Owned Assets Supervision and Administration Commission<sup>4</sup> is a Chinese government body that functions as a holding company for government entities.

## QFII

Qualified Foreign Institutional Investors are foreign financial institutions permitted by the Chinese government to invest in select renminbi-denominated shares on Chinese stock exchanges.<sup>5</sup>

## WRO

Withhold Release Orders are issued by US Customs and Border Protection (CBP) against products made by a named company or region when there is reasonable evidence those goods are produced by forced labor. After the WRO is issued, products that fall under the WRO are blocked from entering the United States.<sup>6</sup>

## XPCC

The Xinjiang Production and Construction Corps,<sup>7</sup> also referred to as the Bingtuan ("The Corps"),<sup>8</sup> is a regional government entity in Xinjiang responsible for forced labor and oppression of Uyghur people. See Introduction: Xinjiang, Uyghurs, and the Xinjiang Production and Construction Corps (XPCC).

# INTRODUCTION

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## Xinjiang, Uyghurs, and the Xinjiang Production and Construction Corps (XPCC)

The Chinese government has long sought to maintain and increase control over the Xinjiang Uyghur Autonomous Region. Xinjiang is the country's westernmost province, and the boundary between China and Central Asia.<sup>9</sup> It is also the historical home of the Uyghur people, a predominantly Muslim and Turkic minority.<sup>10</sup> And though the province is autonomous in name, the Chinese Communist Party (CCP) has increasingly exerted authority over Xinjiang due to fears of an independence movement, terrorism, and cultural and religious diversity that it sees as threatening to the state.<sup>11 12</sup>



Over the course of the 2010s, particularly since 2016, the Chinese and Xinjiang governments have increasingly turned to oppressive and abusive activities to maintain and increase their control over Xinjiang, the Uyghur people, and other local minority populations. Prisons and detention camps in Xinjiang are estimated to hold up to 1.8 million Uyghurs and other ethnic minorities<sup>13 14 15</sup> who are subject to nationalist indoctrination, poor living conditions, forced labor, and torture.<sup>16 17</sup> Several hundred thousand Uyghurs and other ethnic minorities are estimated to have been released from internment camps and forcibly sent to work in Xinjiang or other provinces across China.<sup>18 19</sup> Individuals not directly controlled by the state through detention or forced labor are monitored by an omnipresent surveillance system.<sup>20 21</sup>

As the scale of human rights abuse and forced labor has come to light, more attention has been paid to disentangling companies complicit in Uyghur oppression from the global economy and international supply chains. This is particularly pressing given Xinjiang's role as a major producer of raw goods, including cotton and tomatoes, that have been highlighted as linked to Uyghur forced labor.<sup>22 23 24</sup>

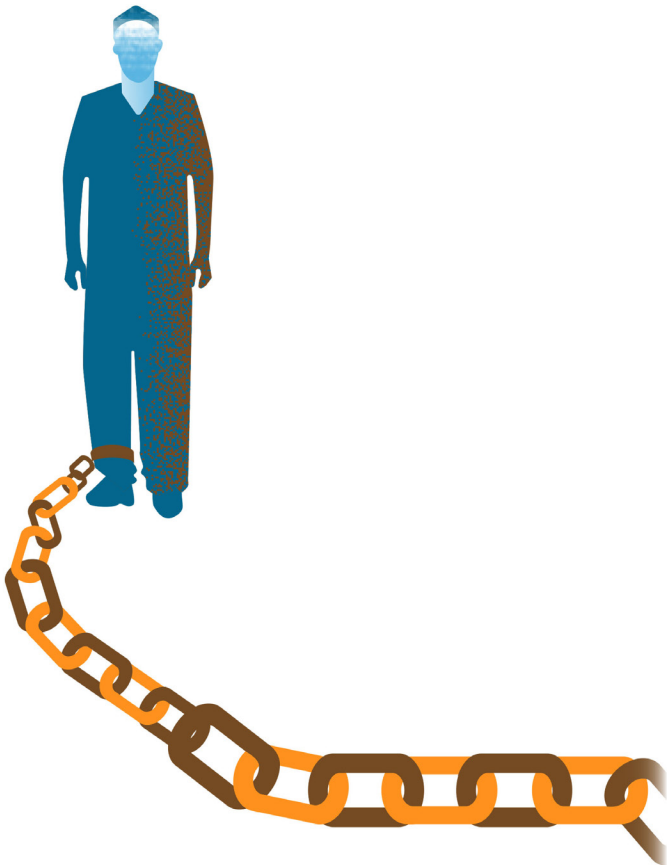
Significant efforts have been made to block goods produced by forced labor in Xinjiang from entering global supply chains. For instance, in January 2019, the United States banned

imports of cotton and tomatoes from the region, and private actors also sought to remove forced labor goods from their supply chains.<sup>25</sup>

<sup>26</sup> However, much of this action took place after investigative reporting by civil society and media organizations, which has connected forced labor in Xinjiang to the global supply of products ranging from personal protective equipment (PPE) to solar panels.<sup>27 28 29 30</sup> These investigations have primarily been deep dives into singular cases or types of supply chains, resulting in fragmented public knowledge and enforcement.

This report addresses this gap by using various data sources to understand how the Xinjiang Production and Construction Corps (XPCC), which has been recognized as a key perpetrator of abuse in the region,<sup>31</sup> engages with and benefits from global financial and trade systems. While the XPCC is not necessarily representative of all the companies using Uyghur forced labor, it is highly involved in Uyghur oppression, has a large economic footprint, and was publicly denounced and sanctioned for its actions. Analysis of the XPCC therefore allows for the examination of how current efforts directed against it are falling short and thus enables a better awareness of how other companies using forced labor in Xinjiang and China may also be reaching global supply chains and financial streams.

# THE XINJIANG PRODUCTION AND CONSTRUCTION CORPS AND ITS ROLE IN UYGHUR OPPRESSION

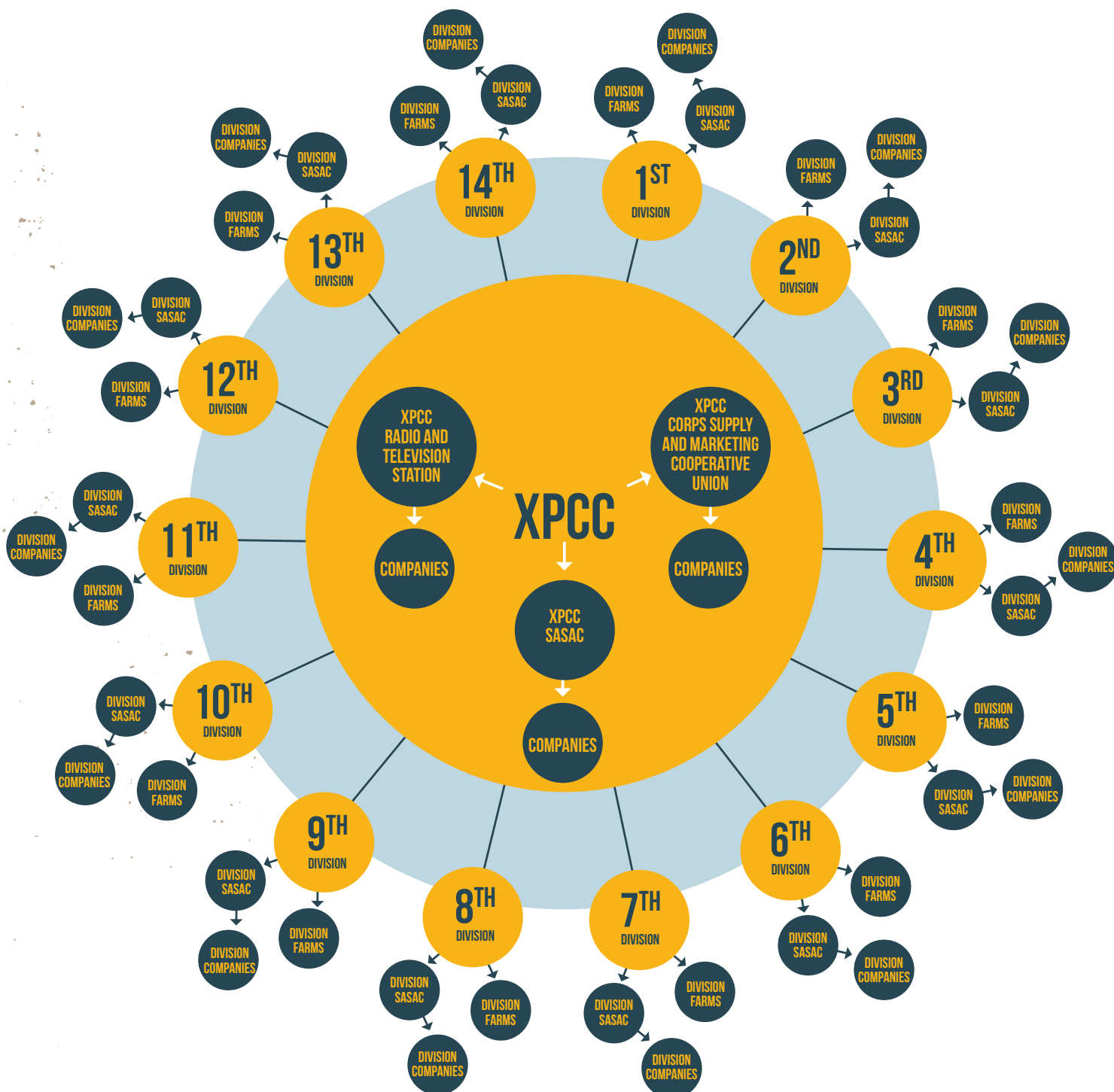


The XPCC originated as a reorganized military body meant to develop Xinjiang and ensure it remained under CCP control.<sup>32</sup> Today, under the direct supervision of the CCP, the XPCC governs certain areas of Xinjiang, serves as a border and internal security force, and plays a development and commercial role through the thousands of companies it controls, which contribute up to 21% of the region's production value.<sup>33 34</sup>

## XPCC Structure

The XPCC was originally formed from the First Field Army of the People's Liberation Army and was organized by the Xinjiang Military District government in 1954.<sup>35</sup> It is composed of 14 geographically-based divisions, each of which has its own regiments, or farms.<sup>36</sup> The XPCC and each of its 14 divisions have their own State-owned Assets Supervision and Administration Commissions (SASAC),<sup>37</sup> in essence, state-owned holding companies. These distinct SASACs, 15 in total, hold many of the XPCC's commercial assets.<sup>38</sup> Other XPCC shareholding companies include the Xinjiang Production and Construction Corps Radio and Television Station<sup>39</sup> and the Xinjiang Production and Construction Corps Supply and Marketing Cooperative Union.<sup>40 41</sup>

## XPCC Commercial Network Structure



The goals of the XPCC have shifted over time, but the intention to control Xinjiang and the Uyghur population has been constant.<sup>42 43 44</sup> The XPCC originated as a means of maintaining Chinese sovereignty in Xinjiang through the migration and sustainment of a significant number of Han people in the region.<sup>45 46 47</sup> Over time, the XPCC has been a driving factor in shifting the ethnic makeup of the region through the migration of Han workers to Xinjiang, and otherwise contributing to the political and economic disenfranchisement of Uyghur and ethnic minorities.<sup>48 49 50 51</sup>

More recently, the XPCC has oppressed the Uyghur people through both government and commercial mechanisms. For instance, data collected by the Xinjiang Victims Database shows that Uyghur people, including imams and scholars, are held in XPCC prisons.<sup>52 53</sup> XPCC materials outline the organization's mandate to stop illegal religious activities and oppose ethnic division, and media reporting indicates that the XPCC has engaged in other repressive activities such as invasive home visits and monitoring.<sup>54 55 56</sup> However, the XPCC has also integrated its agricultural and commercial elements into Uyghur oppression, in particular through forced labor. Research has shown that the XPCC relies on coercive labor transfers to support its cotton harvest, which makes up a significant portion of Xinjiang and China's cotton output.<sup>57 58 59</sup>

In December 2020, acting on evidence of forced labor in XPCC cotton production, US Customs and Border Protection (CBP) issued a Withhold Release Order (WRO) against cotton products made by the XPCC, meaning that any shipments containing XPCC cotton products should be detained at the US border. Since then, CBP has issued WROs against all Xinjiang cotton and tomato products, of which the XPCC is also a major producer, due to evidence of forced labor.<sup>60</sup> In addition to the WROs, in July 2020, the US Department of the Treasury's Office of Foreign Assets Control (OFAC) sanctioned the XPCC for rights abuses against ethnic minorities in Xinjiang. The sanctions prohibit US entities from transacting with the XPCC or any entity of which it is the majority owner.<sup>61</sup> Similarly, in March 2021, the European Union sanctioned the XPCC's Public Security Bureau for its administration of detention centers.<sup>62</sup> Despite these efforts and broader advocacy campaigns to remove high-risk Xinjiang products from global supply chains, reported agricultural production by the XPCC has continued to increase.<sup>63 64</sup>

This paper explains how, despite law enforcement efforts and advocacy pressure, the XPCC continues to engage with and profit from the rest of the world, and details how publicly available information can be applied to improve public and private efforts against forced labor and abuse in China.



# METHODOLOGY

## Mapping the Xinjiang Production and Construction Corps

To understand the XPCC's activities and prevent it from profiting from forced labor and abuse, it is necessary to map its corporate network and identify companies that it controls. The XPCC's full corporate footprint is broad – one estimate of its global holdings suggests it has over 800,000 majority and minority holdings worldwide.<sup>65</sup> However, to understand how the XPCC companies most central to forced labor and other abuses participate in the global economy, C4ADS used a more targeted scope.

C4ADS mapped companies that were 50% or more owned by the XPCC or one of its majority-owned subsidiaries. This process, as discussed below, has the advantage of focusing on entities directly controlled by the XPCC, and therefore on those more closely linked to forced labor and abuse. It means, however, that not all companies affiliated with the XPCC through minority ownership or other mechanisms of influence were captured.

To map the XPCC's corporate network, C4ADS started with 32 XPCC entities at the top of the corporate hierarchy:

### **The Xinjiang Production and Construction Corps**

### **The XPCC State-owned Assets Supervision and Administration Commission (SASAC)**

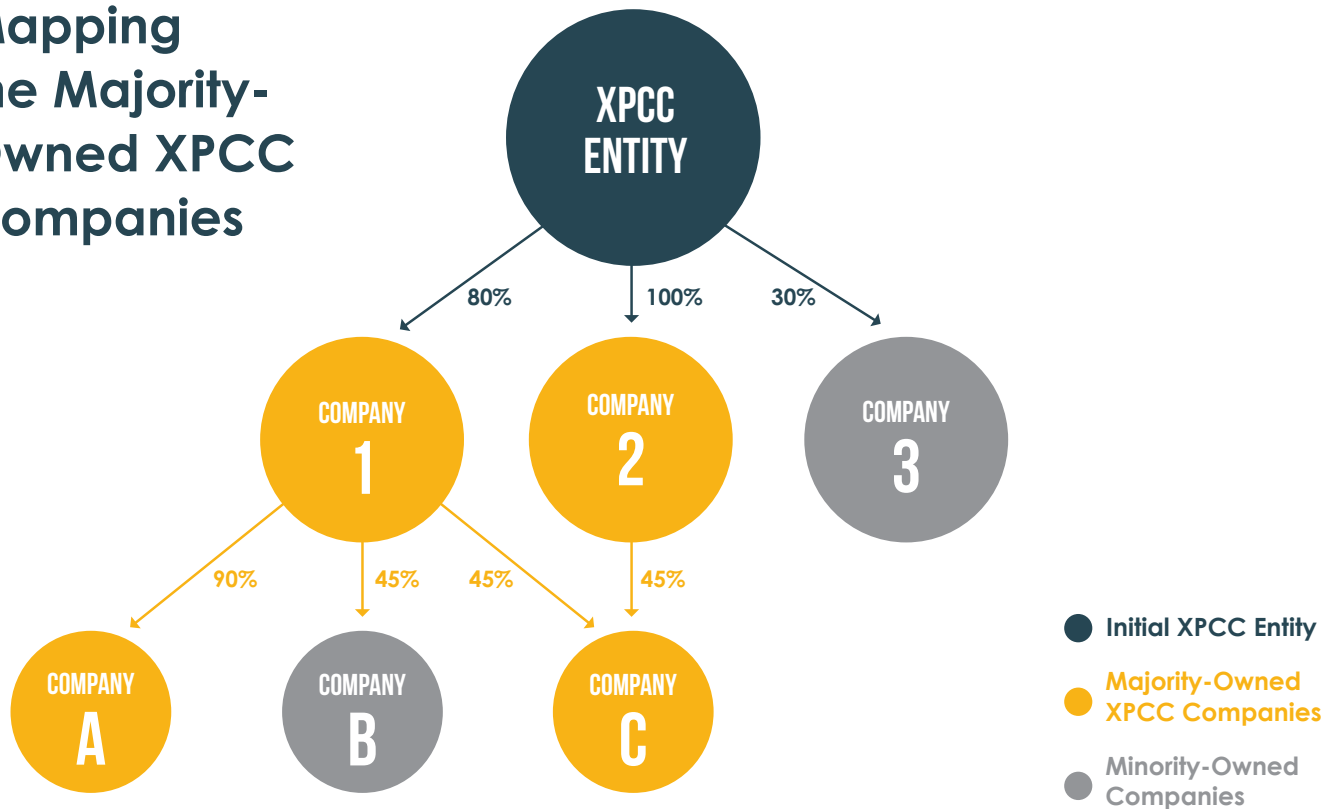
### **The XPCC's 14 divisions and their associated SASACs**

### **The Xinjiang Production and Construction Corps Radio and Television Station**

### **The Xinjiang Production and Construction Corps Supply and Marketing Cooperative Union**

C4ADS then used a corporate registry aggregator, whose information is sourced from official Chinese corporate data, to identify the subsidiaries of those entities that were at least 50% owned by the first layer of XPCC entities. We then repeated the process for those identified subsidiaries by determining any entities for which they owned at least 50% of shares. This process continued until there were no remaining majority-owned subsidiaries, resulting in 2,873 subsidiary companies.

## Mapping the Majority-Owned XPCC Companies



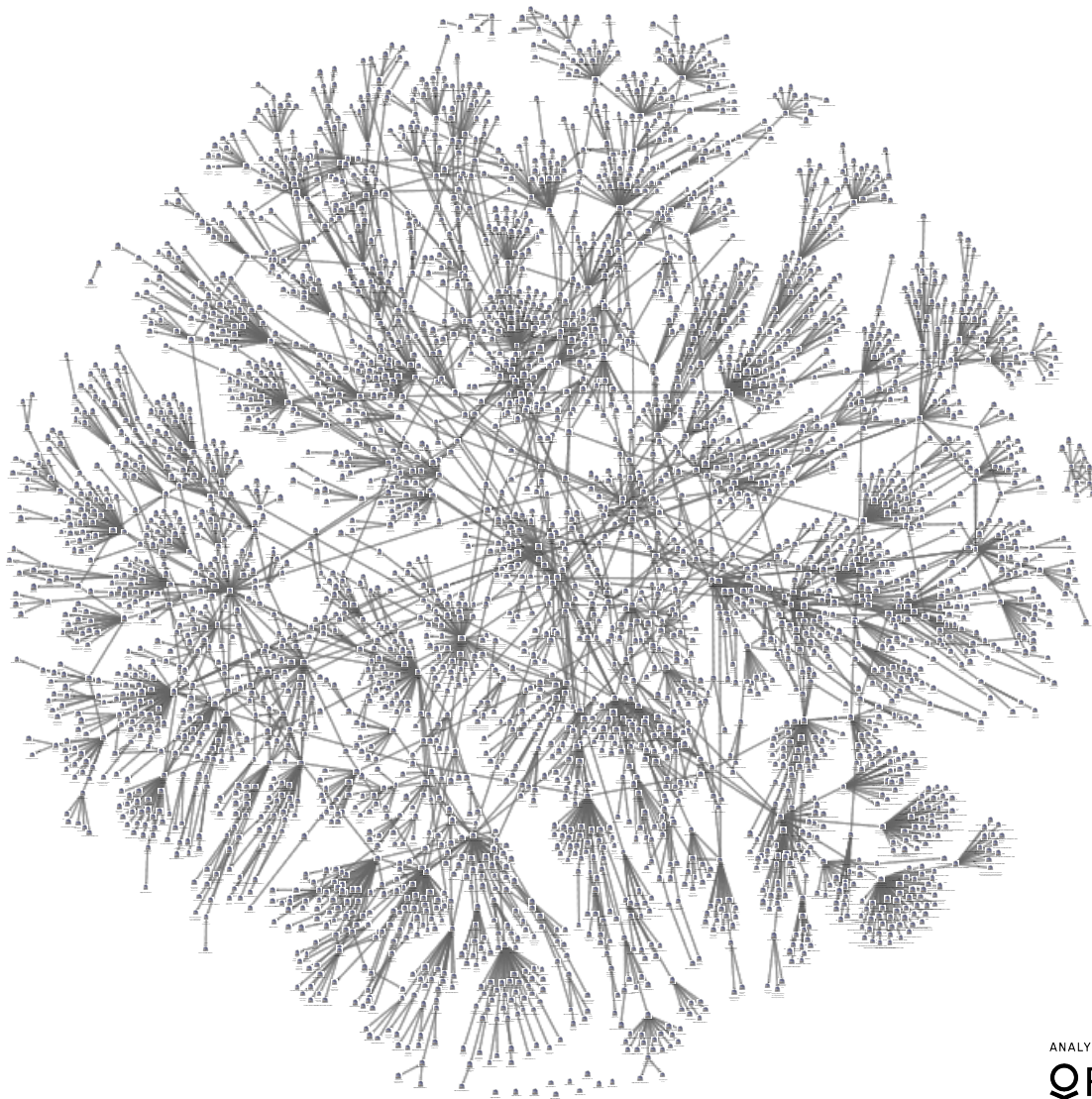
C4ADS identified 50 additional companies that are majority-owned by the XPCC through multiple shareholding companies. We added these companies to those previously identified, resulting in a total of 2,923 XPCC subsidiary companies—the Majority-Owned XPCC Companies List. This list is the basis for this report's analysis. Each section of the report will introduce the sub-methodologies and data sources used to understand how these companies engage with the world.

## Limitations

A strength of this methodology is that it focuses on direct, traceable linkages to key XPCC entities and identifies those most closely associated with abuses in Xinjiang. A weakness of this methodology is that, due to data

constraints, some entities less than 50% owned by the XPCC may still be included.<sup>66</sup> However, most companies captured here meet the 50% ownership threshold. Companies that do not meet this threshold are still considered high risk because they are controlled by entities that are majority-controlled by the XPCC.

Furthermore, this analysis focuses on a high-risk subset of XPCC-affiliated companies but does not reflect the full extent of their control and influence. In addition to its minority holdings, there are many additional pathways through which the XPCC and the CCP can control, guide, and influence domestic companies due to China's unique political economy.<sup>67</sup> While these mechanisms are deserving of attention, this report restricts itself to analyzing the activities of the high-risk entities directly controlled by the XPCC.



ANALYSIS POWERED BY

 Palantir

Majority-Owned XPCC Companies Network Map

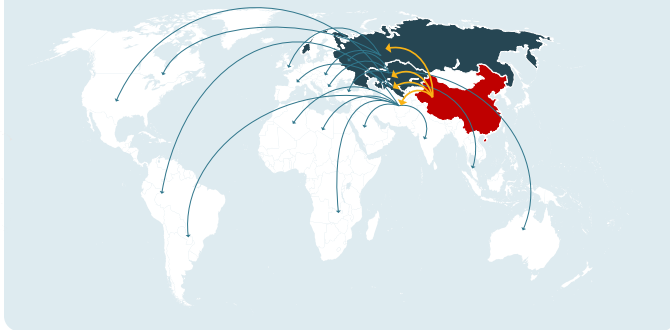
C4ADS uses official corporate records and trade data wherever available to verify corporate holdings and commercial relationships. However, this information represents a snapshot of corporate and trade activity at a given time: records may not be updated regularly, may not be consistent or wholly accurate, and may not have the same reporting standards across jurisdictions, among other limitations. In addition, public records do not reveal all details

of a company's operations or relationships between entities. Therefore, C4ADS limits its analytical conclusions to those supported directly by underlying documentation. Unless explicitly stated, the mention of an individual, company, organization, or other entity in this report is not meant to imply the violation of any law or international agreement and should not be construed to so imply.

# THE XPCC'S GLOBAL TRADE NETWORK

Despite sanctions and international infamy, the XPCC remains connected to profit-generating global supply chains through regional and national trade. Using trade data and other sources of publicly available information, C4ADS traced two routes through which XPCC-produced goods enter global supply chains:

- 1** XPCC subsidiaries sell goods to partners in neighboring or regional countries, which then sell goods globally.



- 2** XPCC subsidiaries sell goods to domestic Chinese partners, which sell goods globally.



The XPCC is an economic powerhouse in Xinjiang. As such, these trade patterns represent an important profit avenue for its agricultural and manufacturing activities. In 2018, the XPCC's total production value was 251 billion yuan (US\$39 billion),<sup>68</sup> or about 21% of Xinjiang's gross domestic product (GDP).<sup>69</sup> Much of this production is destined for consumption in

Xinjiang and elsewhere in China, but more than 10% of it may be directly entering global supply chains; in 2018, Chinese media reported that the XPCC exported goods worth more than US\$7 billion.<sup>70</sup> This is a lower bound estimate, as it does not account for goods sent to other companies in China and then exported internationally.

# TRADE WITH REGIONAL PARTNERS

XPCC subsidiaries export hundreds of millions of dollars' worth of goods to countries worldwide, though publicly available trade records indicate that most shipments go to companies in neighboring Central Asia and Russia.

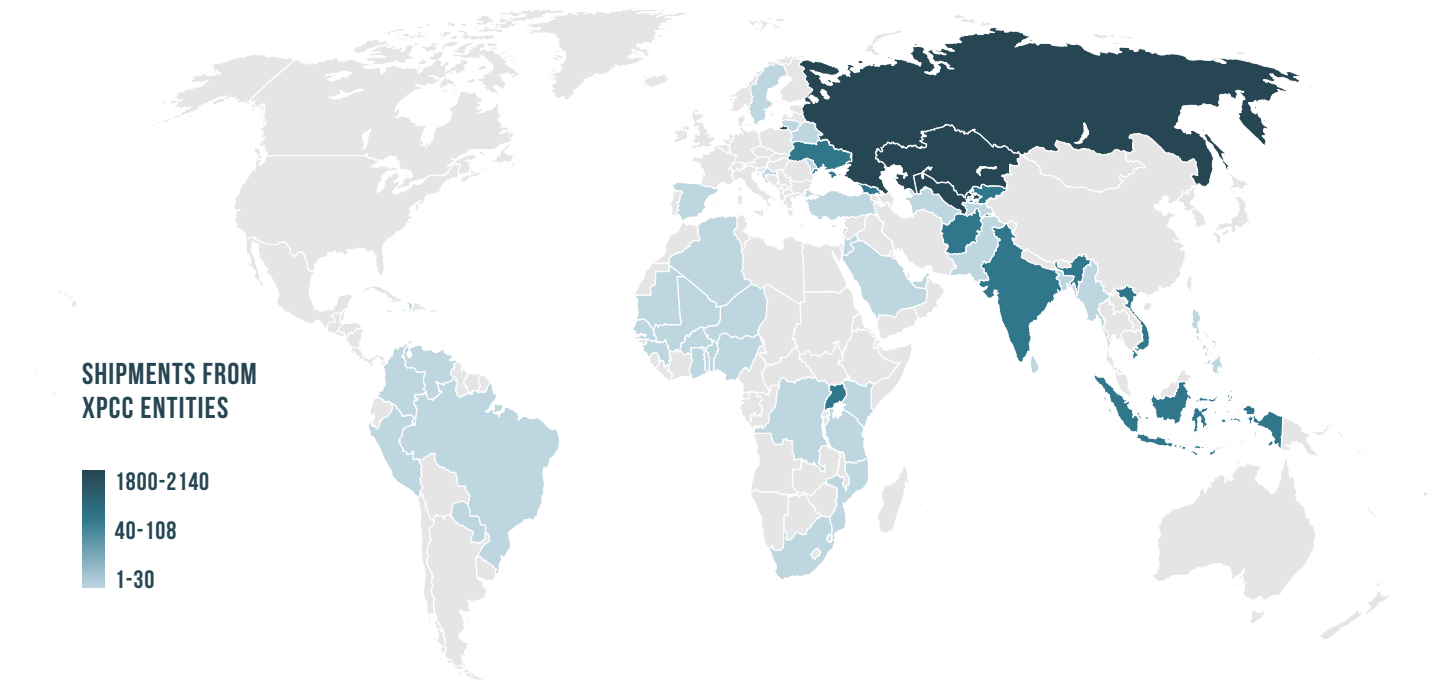
## Methodology:

C4ADS sought to understand how XPCC companies engage in direct trade with international partners. To narrow down the subset of XPCC companies for examination, C4ADS identified all XPCC companies that have the phrase “import and export”<sup>71</sup> in their registered business scope and have official English names,<sup>72</sup> resulting in 121 companies for analysis. C4ADS searched for trade by these companies across commercially available trade data holdings and found that 27 XPCC companies appeared. To ensure recent data and relevance, the analysis that follows focuses on the resulting 7,032 shipments from these companies that occurred between January 1, 2019, and April 20, 2021.

Limitations apply when assessing trade data. Though C4ADS has access to a significant portion of global trade data, universal trade data—either from a geographic or temporal perspective—is unavailable. Therefore, while the presence of trade data between countries or companies can be taken as evidence of a trading relationship, the absence of trade data does not indicate the lack of one. Furthermore, this analysis likely misses trade associated with XPCC companies that do not meet categories for inclusion, as well as trade that is not documented by available trade data. As such, this analysis should be taken as an illustrative portion of the XPCC’s international trade profile, not the entirety of the XPCC’s trade.

Between January 1, 2019, and April 20, 2021, 27 majority-owned XPCC companies exported 7,032 shipments, worth more than US\$716 million. While these shipments were sent to a diverse

group of 52 receiving countries, the majority went to nearby countries like Russia, Uzbekistan, and Kazakhstan.



Available data indicates that the United States and other Western nations, which have largely sought to cut ties with the XPCC, have not had significant direct trading relationships with XPCC subsidiary companies since 2019. This does not appear to be a notable shift in trade behavior: Trade data indicates that from 2015 to 2019, these companies only sent 26 shipments to the United States. Similarly, the identified XPCC companies appear to have had sporadic or low-volume trading relationships with other Western countries.

In contrast, trade data reveals sustained relationships between XPCC companies

and those in nearby Russia, Kazakhstan, and Uzbekistan. Of the 7,032 XPCC shipments analyzed, almost 90% went to Central Asian or bordering countries.<sup>73</sup> While these numbers may not give a holistic view of XPCC trade with Central Asian countries, regional trade routes appear to be consistently high-volume over time, indicating their importance for XPCC commercial activity. Additionally, as demonstrated in the following section, regional trade may obscure the origin of goods sold by XPCC companies or otherwise produced by forced labor, limiting the effectiveness of sanctions and anti-forced labor actions.



# FROM REGIONAL PARTNERS TO GLOBAL SUPPLY CHAINS

The XPCC's regional trade creates a steady stream of profits that further enables Uyghur oppression while strengthening cross-border relationships. However, many regional recipients of XPCC shipments are also part of global supply chains. As such, products potentially made using forced labor may ultimately be exported to countries, such as the United States, that have otherwise low levels of direct trade exposure to the XPCC or Xinjiang.

## Methodology:

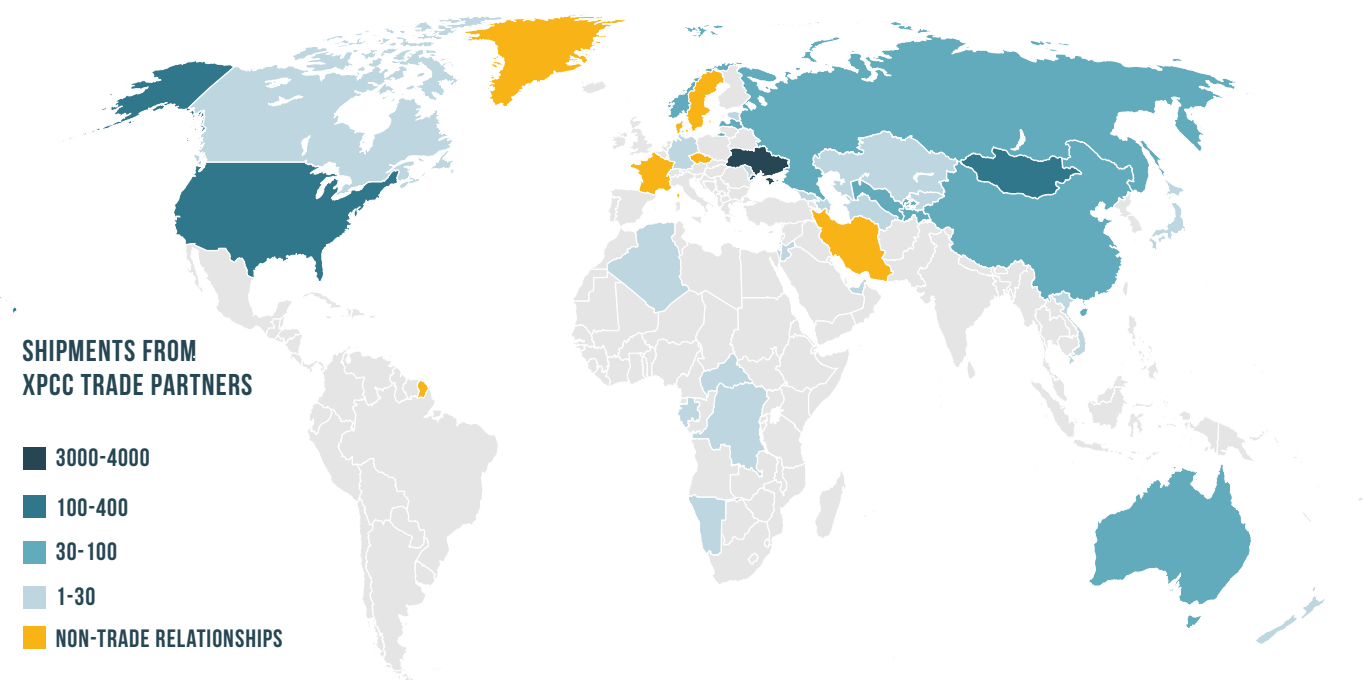
To understand how XPCC trade partners relate to the rest of the world, C4ADS selected the top 20 importers of XPCC goods, as identified in the previous section.<sup>74</sup> We used trade data and open-source analysis to understand how these companies trade and interact with other countries. All 20 companies are based in Russia, Kazakhstan, or Uzbekistan. The analysis that follows includes shipments that took place after January 1, 2019, to ensure that analysis only reflects recent trade.<sup>75</sup> As in the previous section, the

trade data analyzed here is limited by data availability, and therefore may not be wholly representative of XPCC and Xinjiang trade flows. Additionally, it is challenging to definitively confirm if companies that import goods from XPCC companies and then export to third parties are exporting the same XPCC-sourced goods. Nonetheless, these transactions are still at higher risk of involving goods produced by forced labor, and therefore should be subject to higher standards of due diligence and attention.

Since 2019, the top 20 recipients of XPCC goods have sent 4,559 shipments to 30 countries. This includes 15 countries not in the original list of countries importing XPCC goods, such as Australia, Canada, Germany, Israel, Japan,

New Zealand, Norway, and the United States. Additionally, company websites and press releases indicate that the top recipients of XPCC goods have relationships with companies in five additional countries: the Czech Republic, Denmark, France, Iran, and Sweden.





There is a significant risk that the shipments exported by XPCC trade partners are derived from XPCC inputs, allowing goods produced by forced labor to enter global supply chains. Cross-referencing product descriptions in trade records for XPCC companies and their downstream partners may indicate where products initially

sourced from the XPCC are going. To disrupt this trade pattern, private and public stakeholders must engage with, help educate, and support companies in intermediate countries as well as destination countries.

## CASE STUDY

# XINJIANG TOMATOES IN US STORES

Tomatoes from Xinjiang are banned from entering the United States due to the risk they are produced through forced labor.<sup>76</sup> But, tomato products from Xinjiang—and the XPCC—appear to have entered the United States through intermediary countries.

Grand Star LLC,<sup>77</sup> which uses the brand name Kubanochka,<sup>78</sup> is a Russian producer of foodstuffs such as oils, tomato products, and pickles, and it reportedly generates US\$39 million in sales per year.<sup>79</sup> <sup>80</sup> Since January 2019, it has received 157 shipments of tomato products from XPCC subsidiaries Xinjiang Guannong Tomato Products Co., Ltd.<sup>81</sup> and Xinjiang Wanda Co., Ltd.<sup>82</sup> Available trade data indicates that Grand Star has also imported tomato products from two other companies based in Xinjiang.<sup>83</sup> Grand Star does not appear to have imported tomatoes from companies based in other countries or Chinese provinces.<sup>84</sup>

In addition to importing tomato products from Xinjiang-based entities, Grand Star exports

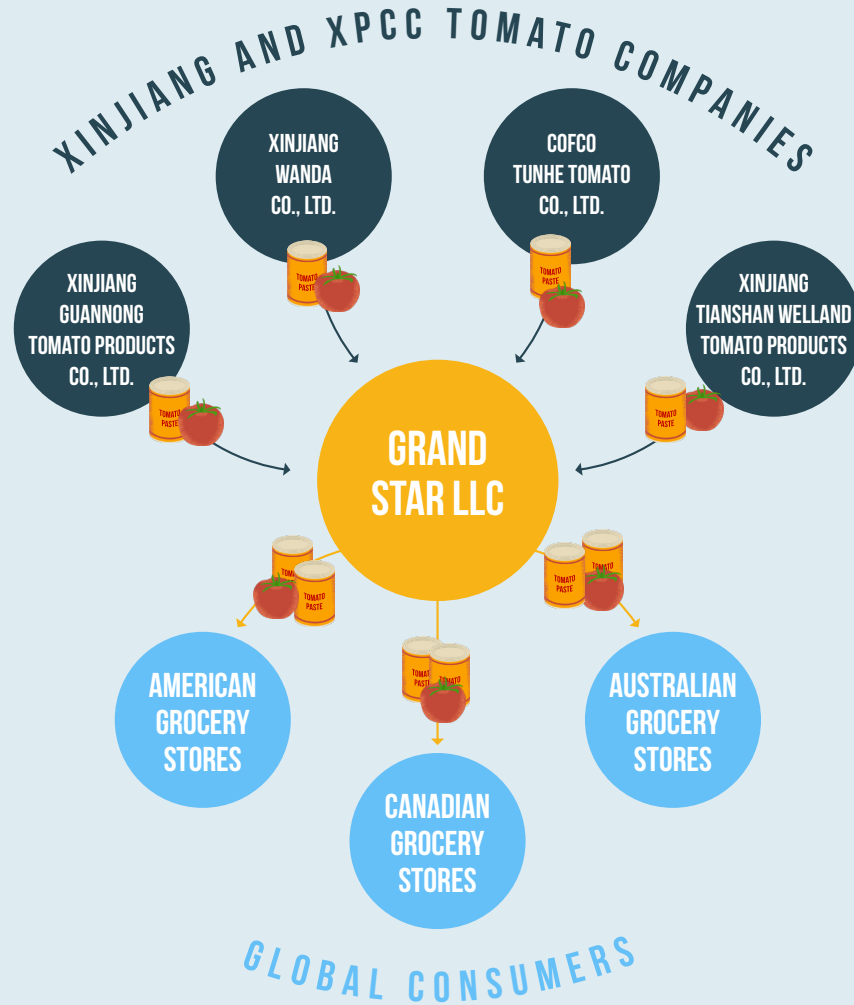
tomato products, along with other goods, worldwide. Trade data shows that, since January 2019, Grand Star has sent at least 4,188 shipments to companies in 24 countries, with the top three destinations being the disputed Donbas region of Ukraine (3,470 shipments), the United States (323 shipments), and Latvia (78 shipments).

These goods are primarily sold under the brand name Kubanochka, indicating that any XPCC products the company is selling are rebranded or further processed by the company, increasing the challenge of determining the tomato products' origins. For instance, according to trade data, of the 323 shipments sent from Grand Star to the United States since 2019, at least 52 shipments explicitly included tomato products. These shipments went to international food stores across the country, from New York to California. Regular shipments from Grand Star to many of these importers indicate sustained trade relationships.



Tomato Products Sold by Grand Star.<sup>85</sup>

## CASE STUDY



Preliminary data indicates that Grand Star continues to export to the United States. According to available trade data, on 17 January 2020, five days after the Xinjiang tomato Withhold Release Order was issued, Grand Star tomato sauce arrived in the United States.<sup>86</sup> Moreover, publicly available information indicates that Grand Star goods, including tomato products, are currently sold online by US retailers.<sup>87 88</sup>

As the Grand Star case study demonstrates, trade through secondary regionally-based companies is a mechanism through which XPCC and Xinjiang goods linked to forced labor enter global markets, including US markets. This is facilitated by the challenge that supply chain tracing poses for stakeholders trying to ensure that goods do not rely on forced labor. Traditional supply chain tracing relies on self-reporting from companies; other tracing methods are often only available to companies in the supply chain and require dedicated funds. By integrating commercially available trade data and publicly available information into tracing efforts, stakeholders can improve practices to ensure that goods produced by forced labor do not enter global supply chains.

# GLOBAL TRADE THROUGH DOMESTIC CHINESE PARTNERS

Another route through which goods from Xinjiang, including those produced by the XPCC, enter global supply chains is by first transiting through one or more Chinese companies before being exported internationally. Understanding nationally-based segments of supply chains can be challenging when relying on publicly available information, since there is no universally produced data signature like trade records to trace goods, but other types of data can be used to gain insight into this activity. In this section, C4ADS uses data on Xinjiang cotton sales to understand the flow of XPCC cotton into global supply chains.

## Methodology:

C4ADS identified and scraped a Xinjiang cotton trading website, Union Cotton, that contained data on cotton available for sale in November 2020.<sup>89</sup> This data included information on the cotton's producer, warehouse, and seller, which were not always the same entities. Cotton produced by XPCC companies<sup>90</sup> was sold on the website in two groups: direct from the website (i.e., there was not an intermediate seller) or by a non-XPCC company. The website did not list the buyers of the batches of cotton. Therefore, while the data does not allow for the direct tracing of cotton batches, it demonstrates that XPCC cotton processors supply the sellers, and the

supply chains of the sellers may be tainted by cotton produced through forced labor.

This methodology should be interpreted as a window into the movement of XPCC and Xinjiang cotton. The data collected was posted on the cotton e-commerce website during November 2020, and this analysis only captures information about companies that used the sales platform during that time. Additionally, entities selling XPCC cotton on the e-commerce site may also sell or export non-XPCC or non-Xinjiang cotton. However, it is difficult to verify that any cotton sold by these entities is not sourced through forced labor.

批次	采摘方式	类型	颜色级	长度	马值	强力	产地	仓库	重量	价格/t	发布时间	
65244201109		锯齿机采棉	无	27.6	3.3	25.5	新疆	库尔勒银星物流...	40.58t	¥	06-10	<a href="#">添加询盘</a>
65244201111		锯齿机采棉	淡点污棉3级	27.8	3.3	25.5	新疆	库尔勒银星物流...	17.66t(公)	¥13528	06-10	<a href="#">添加询盘</a>
65244201110		锯齿机采棉	无	27.7	3.1	26.1	新疆	库尔勒银星物流...	39.093t(公)	¥13628	06-10	<a href="#">添加询盘</a>
65781191240	机采	锯齿机采棉	无	27.4	3.9	23.8	新疆	巴楚县润金仓储...	38.137t(毛)	¥14326	06-10	<a href="#">添加询盘</a>
65781191234	机采	锯齿机采棉	无	27.7	4	24.4	新疆	巴楚县润金仓储...	38.78t(毛)	¥14431	06-10	<a href="#">添加询盘</a>
65720201103		锯齿机采棉	无	28.2	3.6	25.5	新疆	新疆兵团润泽物...	9.363t(公)	¥14765	06-10	<a href="#">添加询盘</a>
65155201077		锯齿机采棉	无	27.9	3.9	25.5	新疆	新疆维吾尔自治区...	41.397t(公)	¥14965	06-10	<a href="#">添加询盘</a>
65720201104		锯齿机采棉	无	28	3.6	27	新疆	新疆兵团润泽物...	27.038t(公)	¥15040	06-10	<a href="#">添加询盘</a>
65720201105		锯齿机采棉	无	28	3.8	26	新疆	新疆兵团润泽物...	26.435t(公)	¥15165	06-10	<a href="#">添加询盘</a>
65178201158		锯齿机采棉	无	28.2	4.8	26.3	新疆	菏泽市棉麻公司...	40.036t(公)	¥15435	06-08	<a href="#">添加询盘</a>

### Xinjiang cotton batches sold on a Chinese e-commerce website<sup>91</sup>

C4ADS identified 31 companies selling XPCC cotton on the e-commerce platform. These companies are located across nine provinces in China and are engaged in a diverse array of activities. Nonetheless, the structure and activities of these companies illustrate their integration with the global economy.

## Commodity Market Highlights Supply Chain Complexity

The industry affiliations of XPCC cotton sellers highlight how complex domestic trade and supply chains complicate the identification of cotton produced by the XPCC or in Xinjiang. The sellers of XPCC cotton can be broadly separated into two overlapping categories: businesses engaged in investment and futures and those involved in trade. According to these companies' registered information and online presence, at least 11 of 31 companies selling XPCC cotton are involved in futures or the investment industry. This reflects cotton's role as a commodity that can be sold via a futures

contract, in which a company agrees to buy or sell a product at a pre-determined price in the future.<sup>92</sup> Many of these investment companies do not have available trade history, nor do they appear to be involved in cotton or textile production. This supports the concept that XPCC and Xinjiang cotton is bought and sold as a commodity within China before it is sold into the processing supply chain, further distorting supply chain visibility.

The remaining two-thirds of the companies selling XPCC cotton through the site are, per their registration information and online presence, explicitly involved in the sale of cotton or general trade.

## International Accreditation Boosts Credibility

At least three of the 31 companies that appear to be selling XPCC cotton—Jiangsu Sinocot International Trade Co., Ltd.,<sup>93</sup> Qingdao Teda Textile Co., Ltd., and Xiamen ITG Group Corp., Ltd.<sup>94</sup>—are listed as members of the Better Cotton

Initiative (BCI), bolstering their credibility and acceptance in international markets.<sup>95 96 97</sup> The BCI is a cotton sustainability and accreditation program that, in October 2020, sought to address forced labor in cotton production by stopping its activities in Xinjiang.<sup>98 99</sup> Members of BCI—including major brands such as Amazon, Ikea, Nike, Target, Tesco, and Walmart—work with accredited farmers, processors, and suppliers to ensure their products are sustainably and ethically sourced.<sup>100</sup> However, the BCI membership of the three companies listed previously indicates that Xinjiang cotton may still be present in BCI supply chains, highlighting the challenge of removing Xinjiang cotton from global consumption.

## Financed Through Public Listing

At least six of the companies reportedly selling XPCC cotton are tied to national and international financial systems through their public listing, or the public listing of their parent company, on the Shanghai, Shenzhen, and Hong Kong Stock Exchanges. Per corporate and financial data, these companies include:

- **Wuchan Zhongda Outai Co., Ltd.,<sup>101</sup> a subsidiary of Wuchan Zhongda Group Co., Ltd.<sup>102 103</sup>**
- **Zhejiang Weixin Trading Co., Ltd.,<sup>104</sup> an ultimate subsidiary of Huafu Fashion Co., Ltd.<sup>105 106 107</sup>**
- **Xinjiang Guannong Tianfeng Products Co., Ltd.,<sup>108</sup> a subsidiary of Xinjiang Guannong Fruit and Antler Co., Ltd.<sup>109 110</sup>**
- **C&D (Shanghai) Co., Ltd.,<sup>111</sup> a subsidiary of Xiamen C&D Inc.<sup>112 113 114</sup>**

- **Xiamen ITG Group Co., Ltd.<sup>115 116 117</sup>**

- **Shanghai Haitong Resources Management Co., Ltd.,<sup>118</sup> an ultimate subsidiary of Haitong Securities Company Ltd.<sup>119 120 121</sup>**

As discussed in the section The XPCC in Financial Markets, publicly listed Chinese companies, including those listed here, are available for domestic and foreign investment through various mechanisms. These companies' public listings not only demonstrate their prominence in the Chinese economy but also reveal that foreign investors may be investing in companies that buy and sell XPCC cotton.

## Engaging in International Trade

Two companies named as selling XPCC cotton through the e-commerce website, Xiamen International Trade Group Co., Ltd. (Xiamen ITG) and Henan Tongzhou Cotton Industry Co., Ltd., have exported cotton products or textiles since January 2019, including to countries such as the United States. The following case study shows that this international trade indicates that XPCC-produced cotton is likely being sold to companies integrated with global supply chains.<sup>122</sup>

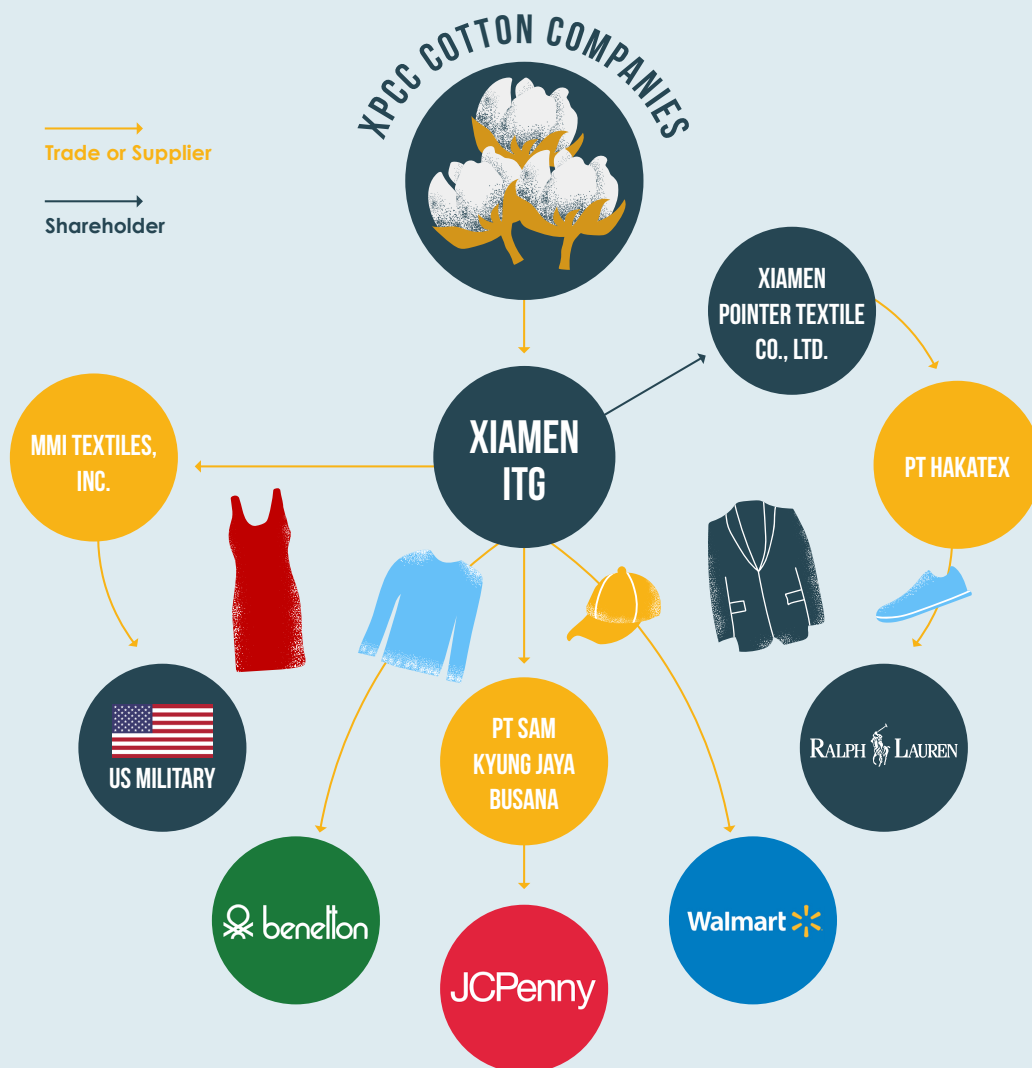
That more companies selling XPCC cotton did not appear in available trade data is likely due to the limitations of the data analyzed. Cotton on the Union Cotton website is being sold to a domestic market, indicating that many of these companies may not be directly engaged in international trade. But this cotton may still be entering global supply chains after it is sold to other Chinese companies, as indicators such as Better Cotton Initiative membership suggest.

## CASE STUDY

# XIAMEN INTERNATIONAL TRADE GROUP AS A COTTON CONDUIT

Xiamen International Trade Group Co., Ltd.,<sup>123</sup> also known as Xiamen ITG, was listed as selling XPCC cotton through the Union Cotton website. Xiamen ITG is a Chinese state-owned, publicly-listed, Fortune 500 company dealing in supply chain management, real estate, and financial services.<sup>124 125 126</sup> It is a member of the Better

Cotton Initiative.<sup>127 128</sup> In addition to selling XPCC cotton on the Union Cotton website, there are references on Xiamen ITG's and other websites to the company's sourcing of XPCC and Xinjiang cotton.<sup>129 130</sup> Despite this, trade data indicates high-profile customers across the globe still buy cotton and textiles from Xiamen ITG.





## CASE STUDY

Using available trade data, C4ADS identified all Xiamen ITG exports since January 2019, focusing on shipments most likely to contain cotton products: those with product descriptions containing the word “cotton,” those mentioning fabric without specifying the material, and those containing nonsensical text.<sup>131</sup> C4ADS found that between 1 January 2019 and 14 April 2021, Xiamen ITG sent 292 shipments meeting those specifications to 15 countries around the world.<sup>132</sup>

Trade data shows that Xiamen ITG—a company with strong ties to XPCC cotton—is embedded in the supply chains of a number of brands through exports to US and global retailers and intermediary companies. While only a portion of examples took place after the US sanctioned the XPCC and banned cotton from Xinjiang, they all demonstrate channels through which fabrics at high risk of being produced by forced labor have entered global and US markets.

The 292 fabric shipments from Xiamen ITG between January 2019 and April 2021 can be grouped into the following categories:

**1. Imports by US Retailers:** Major and minor US retailers imported fabric from Xiamen ITG before and after CBP’s December 2020 Withhold Release Order against XPCC cotton. For example, the US subsidiary of Coppel Corp, a prominent Mexican retailer, imported six shipments of footwear in February 2021. Minor retailers, including a California boutique and an Ohio sportswear company, also imported fabric shipments from Xiamen ITG in 2021. Furthermore, Canadian companies, such as Walmart Canada, imported such shipments through the United States as recently as March 2021. In the year before the ban, retailers including ASOS also imported fabric shipments from Xiamen ITG.

**2. Imports by Global Retailers:** Global retailers also imported cotton and fabric from Xiamen ITG. These include Benetton India, which imported 13 shipments of bags and purses (material unspecified) throughout February 2021. Several smaller companies in Bangladesh, India, and Indonesia also received shipments.

**3. Imports by US Intermediary Suppliers:** US companies that supply major brands and organizations imported cotton or fabric from Xiamen ITG. In 2019, Xiamen ITG sent at least two polyester and cotton fabric shipments to MMI Textiles Inc. in Ohio. MMI Textiles is a military supply company that appears to equip the US military<sup>133 134 135</sup> and supplied PPE to hospitals during the COVID-19 pandemic.<sup>136 137</sup> Also in 2019, trade data indicates that Xiamen ITG sent at least four shipments of fabric to Meridian Textiles in California. Meridian Textiles claims to supply retailers including Walmart, Target, JCPenney, Kohls, and Macy’s.<sup>138</sup>

**4. Imports by Global Intermediary Suppliers:** Xiamen ITG is also connected to global brands through foreign intermediary suppliers. For example, in April 2021, Xiamen ITG sent three textile shipments to PT Sam Kyung Jaya Busana, an Indonesian company that supplies JCPenney, according to trade data. A subsidiary of Xiamen ITG, Xiamen Pointer Textile Co., Ltd.,<sup>139</sup> also sells to intermediary suppliers of foreign brands. As recently as April 2021, Xiamen Pointer Textile shipped cotton to the Indonesian company PT Hakatex, which supplies global brands such as Ralph Lauren, per trade data.

These shipments and relationships reveal an entire ecosystem in which Xinjiang cotton can enter and flow through global supply chains, despite high levels of attention from regulators, the private sector, and advocacy organizations.

# THE XPCC'S REGIONAL AND FINANCIAL REACH

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The XPCC's corporate network directly impacts international development and financial activity through its foreign and publicly traded subsidiaries. These globally connected enterprises create additional pathways through which the XPCC can obtain financial and political capital that enable further abuse of the Uyghur people.

## THE XPCC ABROAD

The XPCC is connected to Central Asian development and economic activity through foreign subsidiaries. The patterns of XPCC foreign ownership underscore China's influence within Central Asia, including through the Belt and Road Initiative.

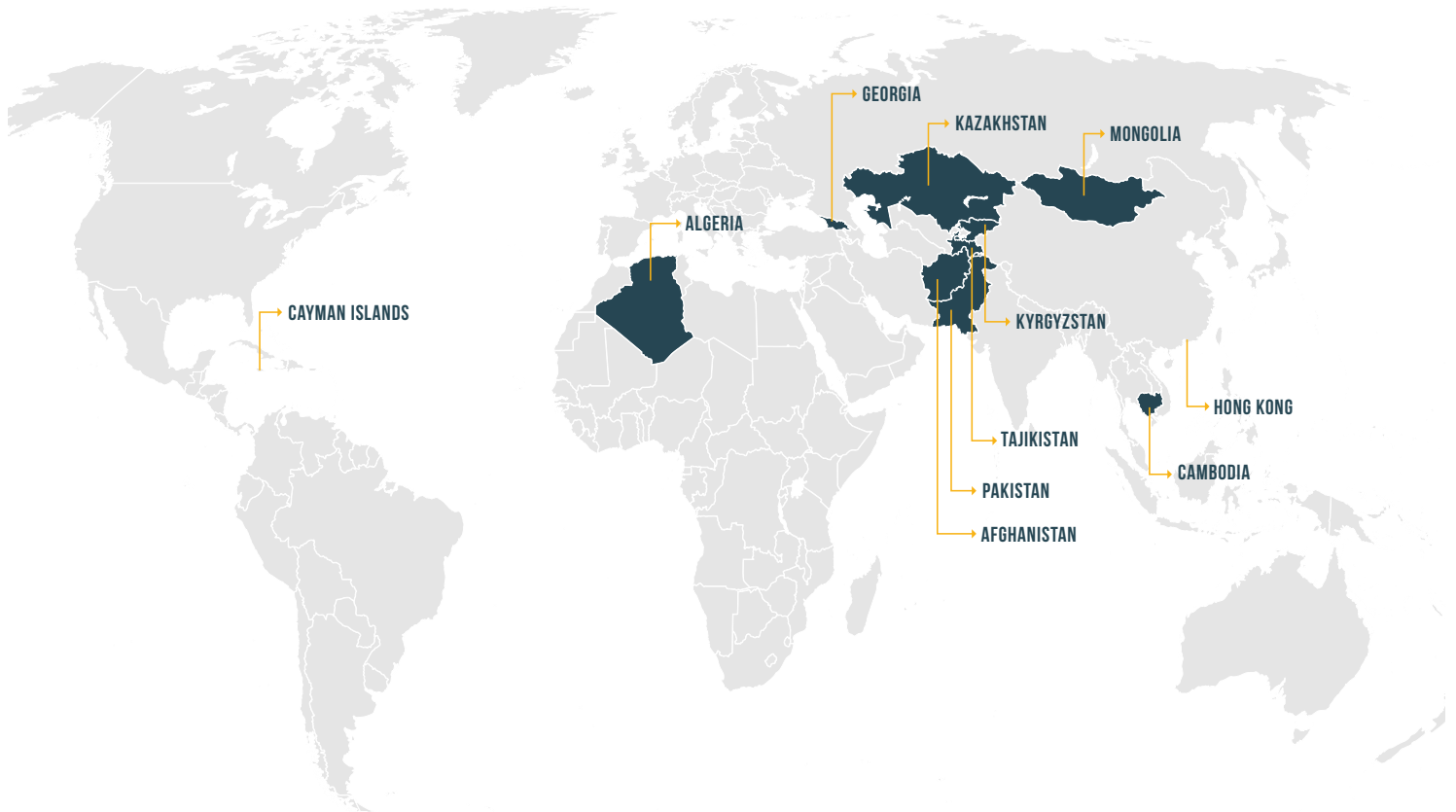
### Methodology:

To identify foreign companies owned or invested in by the XPCC, C4ADS cross-referenced the Majority-Owned XPCC Companies List with an official list of Chinese entities with foreign investments. This analysis may undercount XPCC companies with foreign investments if said investments

are not officially registered or otherwise not listed. Furthermore, given the focus on majority ownership used in this report, this analysis does not include foreign investments by companies minority-owned by the XPCC, which may be another means through which the XPCC exerts control over foreign entities.

According to Chinese foreign investment data, the XPCC has 19 foreign subsidiaries across 11 jurisdictions: Afghanistan, Algeria, Cambodia, the Cayman Islands, Hong Kong, Georgia, Kazakhstan, Kyrgyzstan, Mongolia, Pakistan, and Tajikistan. Most of these companies are based in Central Asia, and almost all of them appear to be involved in trade or infrastructure.

## XPCC Foreign Subsidiary Locations



## CASE STUDY

# XINJIANG BEIXIN ROAD & BRIDGE

Xinjiang Beixin Road & Bridge is a publicly-traded company that builds public transport infrastructure in Xinjiang, throughout China, and abroad.<sup>140 141</sup> The company has eight foreign subsidiaries across Asia and operates at a large scale, claiming that its new contracts totaled US\$88 million in the last quarter of 2020.<sup>142</sup>

In addition to its affiliation with the XPCC, Xinjiang Beixin Road & Bridge participates in both Chinese and global development programs. Reporting from the company and financial outlets suggests that the company is affiliated with China's Belt and Road Initiative, China's pan-Asian infrastructure project meant to facilitate trade and increase global influence.<sup>143</sup>

<sup>144 145</sup> **Xinjiang Beixin Road & Bridge is also a frequent recipient of contracts from the Asian**

**Development Bank, of which the United States is a top funder.**<sup>146 147 148 149 150</sup> In line with both of these programs, Xinjiang Beixin Road & Bridge conducts projects in both China and countries in which it has subsidiaries, such as Pakistan,<sup>151</sup> Tajikistan,<sup>152</sup> and Afghanistan.<sup>153</sup>

Given the company's number of foreign subsidiaries, Xinjiang Beixin Road & Bridge is not a typical case, but it highlights how the XPCC's development role complements other elements of its international activities. The XPCC and other actors using forced labor in Xinjiang build international relationships through foreign subsidiaries. These relationships can increase their political capital and economic profit, obstructing efforts toward a united global response to human rights abuse in Xinjiang.

# THE XPCC IN FINANCIAL MARKETS

The XPCC has access to Chinese financial markets through its publicly traded subsidiaries. Major international banks and financial institutions also hold shares in these companies through foreign investment mechanisms.

## Methodology:

To identify publicly traded XPCC subsidiaries, C4ADS started with the Majority-Owned XPCC Companies List and all of the minority-owned subsidiaries of those companies. In this case, minority-owned companies are included in the analysis, as the XPCC may exert control over a publicly traded company, despite only having a minority stake. This is evidenced by the fact that many of the publicly-listed companies analyzed here reference themselves as XPCC companies on their websites and corporate materials.

C4ADS cross-referenced this extended list of XPCC subsidiaries with the Shanghai, Shenzhen, and Hong Kong Stock Exchanges and identified companies for which the XPCC held a significant stake—20% or greater.<sup>154</sup>

C4ADS then used stock exchange-provided data to identify other shareholders of these companies.<sup>155 156</sup>

As in other sections, this analysis does not include publicly traded companies invested in by companies that are minority-owned by the XPCC and instead focuses on publicly traded companies with clear XPCC affiliation and ownership.

The XPCC is a significant shareholder of 13 publicly traded companies: eight listed on the Shanghai Stock Exchange, four on the Shenzhen Stock Exchange, and one on the Hong Kong Stock Exchange.

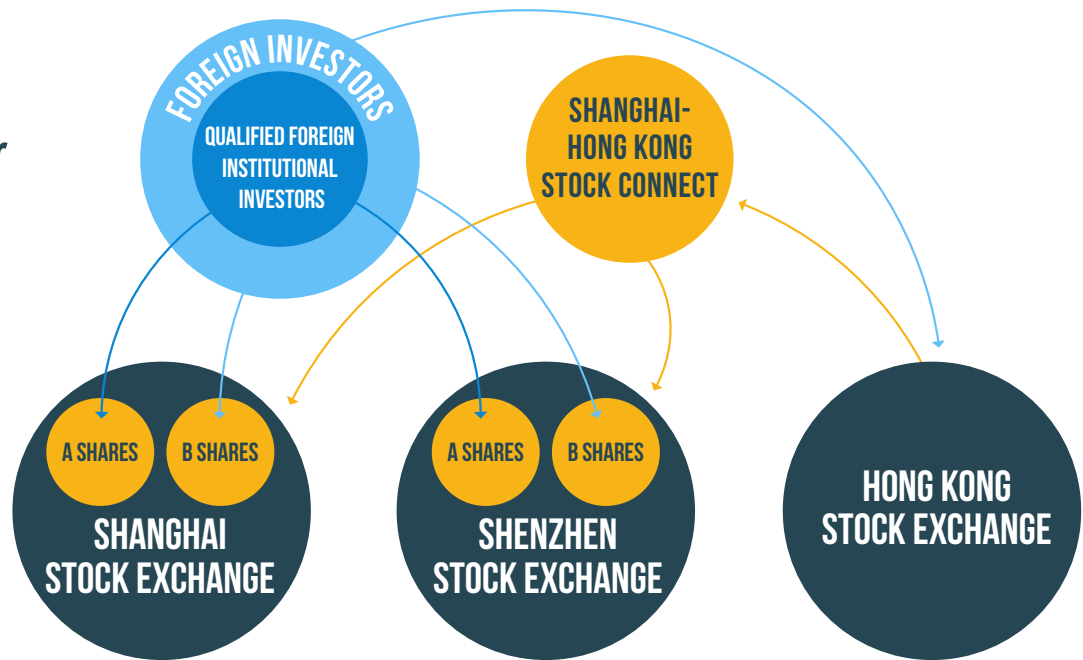
Company Name (English)	Company Name (Chinese)	Stock Exchange	XPCC Minimum Shareholding Amount (%) <sup>157</sup>
Xinjiang Tianye Co., Ltd.	新疆天业股份有限公司	Shanghai	62.32
Xinjiang Tianye Water Saving Irrigation Co., Ltd.	新疆天业节水灌溉股份有限公司	Hong Kong	60.41
Xinjiang Beixin Road & Bridge Group Co., Ltd.	新疆北新路桥集团股份有限公司	Shenzhen	56.02
Xinjiang Tianfu Energy Co., Ltd.	新疆天富能源股份有限公司	Shanghai	49.03
Xinjiang Guannong Fruit and Antler Co., Ltd.	新疆冠农果茸股份有限公司	Shanghai	46.28
Chalkis Health Industry, Co., Ltd.	中基健康产业股份有限公司	Shenzhen	42.58
Xinjiang Sayram Modern Agriculture Co., Ltd.	新疆赛里木现代农业股份有限公司	Shanghai	42.17
Xinjiang Yilite Industry Co., Ltd.	新疆伊力特实业股份有限公司	Shanghai	42.04
Xinjiang Western Animal Husbandry Co., Ltd.	新疆西部牧业股份有限公司	Shenzhen	41.82
Xinjiang Talimu Agriculture Development Co., Ltd.	新疆塔里木农业综合开发股份有限公司	Shanghai	40.32
Xinjiang Tianrun Dairy Co., Ltd.	新疆天润乳业股份有限公司	Shanghai	38.70
Xinjiang Qingsong Building Materials and Chemicals (Group) Co., Ltd.	新疆青松建材化工(集团)股份有限公司	Shanghai	30.02
Tecon Biology Co., Ltd.	天康生物股份有限公司	Shenzhen	26.41

Publicly traded XPCC companies are well-integrated into China's domestic financial system. In addition to the XPCC, domestic shareholders of these companies include some of China's biggest banks, such as the Agricultural Bank of China, Bank of China, and the China Construction Bank. Top investors of XPCC publicly traded companies also include Chinese investment and securities firms and private individuals.

Although capital controls make it difficult for foreigners to invest in Chinese companies, they can do so through the Hong Kong Stock Exchange, which is open to foreign investment.<sup>158</sup> One XPCC company, Xinjiang Tianye Water Saving Irrigation Co., Ltd., is listed on the Hong Kong Stock Exchange.<sup>159</sup> Furthermore, some

Shenzhen- or Shanghai-listed companies are available for investment on the Hong Kong Stock Exchange through the Shanghai-Hong Kong Stock Connect.<sup>160</sup> Six companies in which the XPCC owns significant shares are listed on the Shanghai-Hong Kong Stock Connect.<sup>161</sup> According to the Shanghai-Hong Kong Stock Connect website, subsidiaries of global firms such as BNP Paribas, Citibank, Deutsche Bank, HSBC, Merrill Lynch, Morgan Stanley, Standard Chartered, and UBS also own shares in these companies.<sup>162</sup> According to the Shanghai-Hong Kong Stock Connect website, subsidiaries of global firms such as BNP Paribas, Citibank, Deutsche Bank, HSBC, Merrill Lynch, Morgan Stanley, Standard Chartered, and UBS also own shares in these companies. These investments may be conducted by the financial institutions

## Foreign Investment Pathways for Chinese Stock Exchanges



themselves, or by investors operating through these institutions. Many more foreign investors may be investing in XPCC companies through Hong Kong brokerage companies.

A second way foreigners can invest in XPCC companies is as Qualified Foreign Institutional Investors (QFIIs), a designation that allows global financial institutions to invest in publicly listed companies as if they were domestic investors. While no QFI is a top ten shareholder of the listed XPCC companies, they may still be invested in them at lower levels.<sup>164</sup>

These investments—conducted by financial institutions on behalf of everyday investors—help to finance XPCC companies associated with human rights abuse and entrench their global presence in the face of sanctions and condemnation. Additionally, foreign investment reveals gaps in regulation and enforcement: While trade has been highlighted as a key means through which perpetrators of forced labor access global markets, the financial world has remained largely undisturbed.<sup>165</sup>



# CONCLUSION

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Despite sanctions, trade restrictions, and widespread evidence of its abuses, the Xinjiang Production and Construction Corps remains globally integrated through trade, foreign subsidiaries, and publicly listed companies. This allows the XPCC to profit from forced labor, which global consumers may unwittingly support through their purchases and investments. While this report focuses on the XPCC specifically, other, less-publicized companies exploiting forced labor in Xinjiang have similar access to global trade and finance.

Importantly, the XPCC's linkages to the rest of the world are largely indirect, occurring through domestic supply chains and financial markets or regionally-based foreign subsidiaries and trade partners. This has reduced the efficacy of global efforts to combat forced labor and abuse in Xinjiang, as revealed by C4ADS' identification of high-risk materials in the supply chains of major Western retailers and the investment in XPCC companies by leading financial institutions.

The complexity of the XPCC's engagement with the world makes it hard for stakeholders to understand fully how supply chains intersect with oppression in Xinjiang. As demonstrated in this report, however, publicly available information can be used to gain insights into the corporate, trade, and financial networks of Xinjiang entities

engaged in human rights abuse. In particular, integrating commercially available trade data into tracing efforts increases transparency, helping to ensure that goods produced by forced labor do not reach global consumers.

Stakeholders cannot counter forced labor and oppression in Xinjiang without addressing its regional facilitators, including trade partners in Central Asia and Russia and subsidiaries scattered throughout the region. Engaging with governments, businesses, and civil society in Central Asia has significant potential for disrupting these networks that support Uyghur labor and abuse, but it also presents greater challenges: China's geopolitical and economic role in these countries has and likely will continue to block effective action.

Ultimately, this analysis shows that enforcement and private sector actions are less effective when they do not account for the context of the actors and systems they seek to address. This is particularly true in the case of Xinjiang, where the scale of abuse implicates companies not only in Xinjiang but those in China and the greater region. In light of this, stakeholders must rise to the occasion by using all available forms of data, analysis, and collaborative action to meaningfully fight against forced labor and human rights abuse.

# RECOMMENDATIONS

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In light of the findings from this report, C4ADS proposes the following recommendations for US and foreign governments, businesses, financial institutions, civil society, and media organizations:

## 1 Improve Entity Visibility

US and global law enforcement agencies should publish subsidiary lists for sanctioned or otherwise blacklisted entities to facilitate private sector and civil society due diligence efforts. For example, the US Office of Foreign Assets Control should publish subsidiary lists—in both English and Chinese—for the XPCC and any other entities sanctioned for human rights violations in Xinjiang. Similarly, US Customs and Border Protection should publish lists of companies whose products are banned under region-wide Withhold Release Orders, such as those harvesting, producing, and selling tomatoes, cotton, and derived products from Xinjiang.

Civil society and media organizations should continue to publish information about organizations affiliated with human rights abuse in Xinjiang—including company names in English and Chinese—to support the efforts of governments, the private sector, researchers, and advocates. To this end, C4ADS is making public the Majority-Owned XPCC Companies List highlighted in this report.

The International Labour Organization and the United Nations Human Rights Council should investigate forced labor and other forms of human rights abuse in Xinjiang and publish reports naming the public and private entities contributing to said abuses.

## 2 Leverage Publicly Available Information

This report employs a number of data sources and methodologies that should be adapted and scaled by US and foreign government agencies, private sector actors, and civil society to develop more comprehensive forced labor assessment practices. These include the use of:

- Corporate registries to map domestic and international networks of perpetrating entities
- Commercially available trade data to independently trace risky supply chains
- Publicly available investment data to illuminate financial exposure
- Chinese-language open source information, such as the cotton exchange website highlighted in Global Trade Through Domestic Chinese Partners, to chart domestic supply chains and obtain other relevant information

US and foreign government agencies should improve their ability to procure and use publicly available information for supply chain transparency efforts and support greater use of these techniques within civil society and the private sector.

### 3 Widen the Stakeholder Circle

Central Asia and Russia are key pathways for Xinjiang-produced goods to enter Western markets indirectly. US and foreign governments should engage with governments, businesses, and civil society in Central Asia and Russia to counter the trade in goods produced by forced labor through education, legislation, and the development of alternative sourcing methods.

### 5 Block Forced Labor Imports

US Customs and Border Protection should investigate the findings in this report that cotton and tomato products originating in Xinjiang are entering US supply chains and implement penalties against importers in violation of current Withhold Release Orders.

In passing and implementing legislation to prevent Uyghur forced labor, the US Congress and any other bodies considering such legislation should increase the resources and personnel dedicated to assessing and blocking imports that may have been produced by forced labor. Furthermore, such legislation should promote the development of new and innovative supply chain tracing methodologies, including but not limited to those relying on publicly available information.

Foreign governments should implement legislation prohibiting the importation of goods produced by forced labor in alignment with current US and Canadian legislation.<sup>167 168</sup>

### 4 Divest from Human Rights Abuse

US and foreign governments should prohibit investment in companies that have been found to support human rights abuse, including the XPCC, its subsidiaries, and any other entities found to be supporting Uyghur oppression. This could be done by implementing an executive order that expands the scope of Executive Order 14032.<sup>166</sup>

Financial institutions should divest from XPCC subsidiaries and assess other holdings, particularly those in Xinjiang, for involvement in human rights abuse.

The US government, foreign governments, and the international organizations they support should abstain from funding projects or providing loans for entities supporting Uyghur oppression.

### 6 Increase Supply Chain Transparency

Private sector actors should require greater transparency regarding labor practices and product sourcing by companies in their supply chains that are more likely to source high-risk products from Xinjiang, such as Central Asian, Russian, and Chinese companies that supply tomato or cotton products. If companies in their supply chains engage in or support forced labor or refuse to be transparent about their labor and sourcing practices, private sector actors should stop procuring goods from those entities.

Accreditors and industry groups should similarly require increased supply chain and labor practices transparency and prohibit membership by companies found to be employing forced labor or sourcing products made by forced labor.

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38 Chinese corporate registry third-party aggregator.

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## 71 进出口

72 Trade data platforms predominantly use English language names rather than Chinese characters.

73 Countries bordering Xinjiang include Afghanistan, India, Kazakhstan, Kyrgyzstan, Mongolia, Pakistan, Russia, and Tajikistan. Turkmenistan and Uzbekistan are the only Central Asian countries that do not border Xinjiang.

74 The top 20 importers of XPCC goods all appear to maintain consistent, high-volume trade

relationships with XPCC companies and imported more than 50 shipments from XPCC companies between January 2019 and April 2021. They were therefore chosen as the highest-risk exporters to third-party companies and countries.

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78 Кубаночка

79 Кубаночка [Kubanochka] (n.d.). Retrieved June 15, 2021, from <http://www.kubanochka.ru/>. Archived at <https://perma.cc/SW9D-MR8D>.

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81 新疆冠农番茄制品有限公司

82 新疆万达有限公司

83 COFCO Tunhe Tomato Co., Ltd. (中粮屯河番茄有限公司) and Xinjiang Tianshan Welland Tomato Products Co., Ltd. (新疆天山沃园番茄制品有限公司).

84 It is possible that Grand Star is sourcing tomato products grown in Russia or tomatoes imported to Russia by other Russian companies and then sold to Grand Star.

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93 江苏盛高国际贸易股份有限公司

94 厦门国贸集团股份有限公司

95 Better Cotton Initiative (n.d.). Find members.

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100 Better Cotton Initiative (n.d.). Find members. Retrieved June 8, 2021, from <https://bettercotton.org/find-members/>. Archived at <https://web.archive.org/web/20210608193848/https://bettercotton.org/find-members/>.

101 物产中大欧泰有限公司

102 物产中大集团股份有限公司

103 Chinese corporate registry third-party aggregator.

104 浙江维新贸易有限公司

105 华孚时尚股份有限公司

106 Chinese corporate registry third-party aggregator.

107 Bloomberg (n.d.). 002042:CH. Retrieved June 15, 2021, from <https://www.bloomberg.com/quote/002042:CH>. Archived at <https://web.archive.org/web/20210608210215/https://www.bloomberg.com/tosv2.html?vid=&uuid=cd5a6980-c89c-11eb-8baa-0bcfdcec73e2&url=L3F1b3RlZAwMjA0MjpDSA==>.

108 新疆冠农天洋物产有限责任公司

109 新疆冠农果茸股份有限公司

110 Chinese corporate registry third-party aggregator.

111 建发(上海)有限公司

112 厦门建发股份有限公司

113 C&D Inc. (n.d.). Supply chain operator. Retrieved June 15, 2021, from <http://http://www.chinacnd.com/en/about.html>.

114 Chinese corporate registry third-party aggregator.

115 厦门国贸集团股份有限公司

116 Xiamen ITG Group Co., Ltd. (n.d.). Retrieved June 15, 2021, from <http://www.itg.com.cn/en>. Archived at <https://perma.cc/9KXK-UF33>.

117 Bloomberg (n.d.). 600755:CH. Retrieved June 15, 2021, from <https://www.bloomberg.com/quote/600755:CH>.

118 上海海通资源管理有限公司

119 海通证券股份有限公司

120 Shanghai Stock Exchange (2019, September 11). (600837) "Haitong Securities Company Limited" (the Company) -- Announcement on

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Xiamen ITG Group Co., Ltd. (n.d.). Supply chain management. Retrieved June 15, 2021, from <http://www.itg.com.cn/cn/business/detail/130>. Archived at <https://perma.cc/3JB4-GGGQ>.

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154 In analyzing the publicly listed companies in which XPCC companies were shareholders, C4ADS found that some XPCC minority-owned companies still advertised themselves as XPCC companies. However, the next lowest XPCC shareholding amount of a company after Tecon Biology Co., Ltd. (26.41 %) is in the single digits. C4ADS, therefore, decided to focus on companies with 20% or more XPCC ownership.

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157 This value is the lowest possible percentage of XPCC ownership of the listed company. To have their ownership stake considered, XPCC subsidiaries had to be among the top 10 shareholders listed. Data is derived from Sina Corp and is accessible at [vip.stock.finance.sina.com.cn/mkt/#kcb\\_root](http://vip.stock.finance.sina.com.cn/mkt/#kcb_root).

158 Companies traded on the Shenzhen and Shanghai Stock Exchanges can be traded through “A shares”—open only to Chinese companies and a select number of foreign companies—or “B shares,” available for foreign investment. In this case, however, none of the XPCC companies had “B shares” available.

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