



# ANNEX B

## Corporate Responses

The research presented in "Driving Force" was drawn from publicly available sources or bills of lading available by subscription, which allowed the researchers to identify **exposure to Uyghur labor transfers** in automotive supply chains.

All companies named in "Driving Force" were emailed to provide the opportunity to contribute to the report findings. (Some emails bounced back and additional email addresses were attempted where available.) The research team invited Chinese companies to explain their relationship to the labor transfer programs and asked downstream corporations to indicate any relationship they have to the named Chinese suppliers and intermediary manufacturers and to describe efforts they have made to exclude Uyghur Region products from supply chains. The research team cannot independently verify these claims, but we allowed companies an opportunity to address the risk identified in our research.

Below are the responses received to date. These responses will be updated as new information is received.

Last Updated: October 16, 2024

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Kumho Tire  
Huizhou Desay SV Automotive Co., Ltd

**BOSCH**  
**November 16, 2022**

Dear Laura,

Thank you for the email and this information. We take any indication of the use of forced labor in our supply chain very seriously and appreciate any information that we receive in this regard. Currently, we are reviewing the provided list of suppliers carefully.

In order to simplify this process, may I ask you a clarifying question?

If I understand correctly, you base your assessment on shipping data. Would it be possible to receive the data/evidence that indicates the connection of one of these suppliers to Bosch? This would help us to streamline the investigation.

I would also like to ask some small questions on the next steps of the report, if that is fine by you. Below, you state that our responds to your inquiry will be published on our landing website. Will the provided information also be included in the report itself? Will you publish the statement as is (as a quote or similar) or adapt it to the format of your publication? What will happen with the report once it is published?

Thank you so much to answer my questions. If you would prefer, I would be happy to discuss these questions on the phone as well.

Kind regards,  
Ellen Bulander

**December 3, 2022**  
**[in response to additional information on the suppliers named in our report.]**

Dear Prof. Murphy,

Thank you for your inquiry, and provided information, regarding your research into whether forced labor in/from the Xinjiang Uyghur Autonomous Region (XUAR) is used in the manufacturing of products relevant to the automotive industry.

Bosch is committed to ensuring that its products are not produced wholly or in part by forced labor. Regarding the XUAR, Bosch does not mine, produce or manufacture products in that region.

Materials and components from our direct suppliers also are not mined, produced or manufactured at sites in the XUAR. This includes the company CATL that you have identified to us. As to Shenzhen Deren, another company you have identified to us, this is not a direct supplier to Bosch.

In our "Basic principles of social responsibility at Bosch," Bosch states its commitments to fair working conditions and respect for human rights and specifically rejects forced labor of any kind. Our principles of social responsibility are based on the core labor standards of the International Labour Organisation (ILO) and Ten Principles of the United Nations Global Compact. Bosch's value-based corporate culture applies at all of our operations worldwide. We do not tolerate forced labor at our own sites or those of our suppliers.

We describe these commitments to our suppliers in our Terms and Conditions of Purchase and in our Code of Conduct for Business Partners. The Code of Conduct for Business Partners stipulates

that our suppliers pass these requirements on to their sub-suppliers. If there is a breach, it is to be ceased immediately.

On-site inspections are a component of our management of our supply chain. We currently use two methods as part of the regular assessment of our suppliers' sustainability performance, which includes the prohibition of forced labor. These checks are mainly carried out in potentially high-risk regions or industries, or when there are any specific indications of impropriety. If a supplier deviates from our standards, Bosch reserves the right to end the business relationship or to terminate agreements. Beyond inspections, Bosch provides training to suppliers on social responsibility and discusses social responsibility at supplier events.

Additionally, human rights form one of our six fundamental dimensions in our target vision "New Dimensions – Sustainability 2025." Bosch's sustainability report for 2021 explains in detail how we approach this dimension through due diligence on human rights. We invite you to review the report, including its discussion of management of our supply chain (pages 44-57):

[https://assets.bosch.com/media/global/sustainability/reporting\\_and\\_data/2021/bosch-sustainability-report-2021.pdf](https://assets.bosch.com/media/global/sustainability/reporting_and_data/2021/bosch-sustainability-report-2021.pdf)

We hope that the foregoing information gives you a deeper understanding of Bosch activities on human rights and sustainability and that you will take this information into account as you prepare your report on the results of your research.

**December 5, 2022**

**[In response to information indicating that Shenzhen Deren names Bosch as a customer]**

Dear Laura,

Thank you for your email and your follow-up question. Our statement from last Friday remains correct, we have no direct supplier relationship with Shenzhen Deren. We do not know why the company names us on their website, you may want to reach out to them directly to get further information on this. Thanks to your information, our purchasing organization will get in contact with them as well.

Kind regards,

Ellen

Mit freundlichen Grüßen / Best regards

Ellen Bulander

Corporate Office Sustainability, Environment, Health and Safety # Ideas Lab (C/SEL)

Robert Bosch GmbH

**ASTON MARTIN**

**November 21, 2022**

Dear Prof. Murphy,

Following on from my email below, we have conducted an initial review of all Aston Martin's Tier 1 and Tier 2 suppliers and have not yet been able to establish any links to the companies in XUAR you have provided.

Given the importance of responsible procurement at Aston Martin, I wanted to ask if there is any specific information you may be able to share with us from your own investigation? You mention below you have linked Aston Martin to the companies below by shipping data. Which companies are these?

Regards,  
Paul

**December 4, 2022**

**[in response to SHU providing information that Aston Martin appears to be sourcing from Joyson Safety Systems.]**

Dear Prof. Murphy,

Following an internal investigation into this matter, please find an official response to your enquiry copied below. Do let me know if you have any further questions.

**Statement on behalf of Aston Martin Lagonda:**

Aston Martin issues a [Responsible Procurement Policy](#) to all its suppliers, which includes a zero-tolerance approach to forced labour within our extended supply chain, to which it requires all its suppliers to commit.

Since being contacted by Sheffield Hallam University, we have undertaken our own internal investigation and confirmed that there are no direct links between Aston Martin and the companies the University has identified as operating in the Xinjiang Uyghur Autonomous Region.

As the University has highlighted, Aston Martin sources several components from Joyson Safety Systems' businesses in the European Union. Aston Martin has received reassurances from this supplier that it is acting in full accordance with our Responsible Procurement Policy, along with all of Joyson's subsidiaries and suppliers. Joyson Safety Systems has reiterated its own commitment to the United Nations International Charter of Human Rights. Further, the company's [Code of Ethics and Business Conduct](#) and [Supplier Code of Conduct](#) expressly prohibit the use of forced labour, human trafficking, and other practices in violation of human rights, and they require suppliers to sign an acknowledgement agreeing to comply with the JSS Supplier Code of Conduct.

Aston Martin takes compliance with all relevant legislation seriously and will take immediate action where it identifies any failure to comply with its Responsible Procurement Policy.

Regards,  
Paul  
Paul Garbett, Head of Corporate and Brand Communications

**MERCEDES-BENZ**  
November 21, 2022

Dear Laura

Your email to Andrea Berg, my Mercedes-Benz US colleague, has been forward to my Mercedes-Benz HQ colleagues in Germany. Their response is below – I've been asked to forward this as I am based in the UK.

Best  
Debbie

First of all thank you very much again for bringing this to our attention. We take all such reports very seriously and follow them up.

However, to clarify the issues you raised in your request we kindly ask you to send us more detailed information on your findings.

In general, with our [Principles of Social Responsibility and Human Rights](#), we commit to upholding and respecting human rights as laid out in the International Bill of Human Rights, the International Labor Organization's Declaration on the Fundamental Principles and Rights at Work and the Guiding Principles on Business and Human Rights of the United Nations.

Our aim is to ensure that human rights are respected in all our Group companies, by our partners and by our suppliers.

As stated in our Responsible Sourcing Standards we expect compliance with these principles also from our business partners, which includes good working conditions as well as free choice of employment and environmental protection. This applies to suppliers, their employees and their subcontractors. Mercedes-Benz calls on its direct suppliers to apply the standards, which are currently being updated, in their upstream value chains and to monitor their compliance.

**Debbie Hull**  
Communications & Events Director  
Mercedes-Benz Cars UK Limited  
Corporate Communications & Events

**NISSAN**  
November 29, 2022

Dear Laura

I'm Azusa Momose from Nissan's global communications team.

Thanks for reaching out.

On your inquiry below, Nissan is committed to complying with all applicable laws and regulations in every market in which we operate.

In line with our global Human Rights Policy Statement, our goal is to conduct ethical, social and environmentally conscious business practices at every level of our global supply chain. In order to achieve this goal, we are committed to working with our business partners, including suppliers and contractors, to enhance transparency and traceability in our supply chain to further the objectives of our policy.

Best regards,

Azusa Momose, Nissan

**ORA**

**November 29, 2022**

Dear Mrs. Murphy,

Thank you for your e-mail!

We are seeking all relevant information and will issue a reply as soon as possible.

Best regards,

GWM Europe Team  
Great Wall Motor Deutschland GmbH

**RIO TINTO**

**November 30, 2022**

Response to Sheffield Hallam University's Helena Kennedy Centre of International Justice –  
Research on Forced Labour in automotive industry in Xinjiang Uyghur Autonomous Region

30 November 2022

Dear Professor Murphy

Thank you for the opportunity to respond to your email of 14 November 2022 regarding the upcoming research report to be released by Sheffield Hallam University's Helena Kennedy Centre of International Justice.

Rio Tinto rejects any form of modern slavery. We commit to respect and support the dignity, wellbeing and human rights of all people including the communities where we live and work, our workforce and others affected by our activities and business relationships.

We have just updated our [Human Rights Policy](#) which contains more details about Rio Tinto's overall approach to human rights in line with the United Nations' Guiding Principles on Business and Human Rights. Further details of our approach to human rights can be found [here](#).

We have set out our responses to your questions raised in your email below.

**Can you confirm that you supply raw materials to companies in the XUAR or to companies that operate subsidiaries that process those raw materials in the XUAR?**

We do not supply raw materials to companies in the XUAR. We are aware that some of our customers may have subsidiaries in XUAR, however, Rio Tinto has no commercial or business relationship with these XUAR-based subsidiaries.

All our customers go through a detailed Know Your Customer review process. This includes reviewing whether entities meet our standards in multiple areas including business integrity and human rights. We also undertake frequent review of trade sanctions and other watchlist checks for all of our customers.

The majority of our customers across commodities are long-term. These are entities with whom Rio Tinto has multi-year relationships and frequent interaction. We are committed to engage and collaborate with our customers to advance respect for internationally recognised human rights.

**What do you do, if anything, to ensure that your company does not profit from companies engaged in state-sponsored labor transfer programs that experts have identified as forced labor?**

We reject any form of modern slavery including forced labour, debt bondage, forced marriage and trafficking; child labour; or other labour exploitation in our activities and value chain. This includes:

- Implementing policies, standards and processes that form our overall control framework to respect human rights and help protect against our involvement in modern slavery (e.g., Supplier Code of Conduct, Human Rights Policy, contract clauses and others);
- undertaking due diligence processes to assess and mitigate modern slavery risks including our approach to training and capacity building and how we engage and collaborate with stakeholders;
- providing grievance mechanisms and remediation processes; and
- assessing the effectiveness of our actions taken and outline the process of consultation undertaken across our business.

We publish an annual statement on modern slavery, which complies with the UK Modern Slavery Act and the Australian Modern Slavery Act. Retrospective and current statements can be found here.

We would welcome a continued dialogue with yourselves on these matters. If you have any questions, please do not hesitate to reach out to me.

Melinda Buckland

Head of Communities and Social Performance

**PIRELLI**  
**November 30, 2022**

Dear Professor Murphy,

Thank you for your email, and we appreciate your research aiming to advance the all-important cause of human rights.

On your first question, Pirelli is not a customer of any of the companies you listed, and we have no direct suppliers in the XUAR. We would appreciate it if you would correct your records, and not list Pirelli among companies sourcing from this region.

Our procurement program includes a rigorous selection and onboarding process with human rights contractual obligations, required adherence to Pirelli's sustainability clause, and audits both before selection and after. We also ask our suppliers to adopt the same standards with their suppliers.

1. See our policies ( [The values and Ethical Code of Pirelli Supplier Code of Conduct \(pirelli.com\)](#)

[Global human rights policy \(pirelli.com\)](#)) and supplier portal: [Supplier Portal | Working Together | \(pirelli.com\)](#) (US version here: [Supplier Portal | Working Together | \(pirelli.com\)](#) ). More information is available in our annual report (see pages 109-118 here: [PIRELLI\\_ANNUAL\\_REPORT\\_2021\\_ENG.pdf](#)).

Supply chain traceability is a priority for us. As an example, see our sustainable natural rubber policy, implementation manual, and progress report: [Sustainable Natural Rubber \(pirelli.com\)](#).

Responsible supply chain management is, of course, a journey, and every year we publish our progress in our annual report. We are grateful for the efforts of NGOs and research organizations and we believe in working together towards the common goals outlined in the UN Sustainable Development Goals.

Lastly, we believe it would be helpful if research organizations such as yours could list companies with their Chinese names and taxpayer numbers, given the opportunities for confusion.

Thank you, and please let us know if you have further questions.

Barbara Lightwood



**April 6, 2023**

Dear Ms. Murphy,

A study you published some months ago claimed that Pirelli was among the companies at risk of exposure to products made with forced labour in China's Uyghur region.

Despite our writing to you twice to state that this was not true and asking that Pirelli's name be removed from your report, you did not remove our name from the study while at the same time publishing our denial, evidently placing more faith in the unverified media articles that your report referenced than the actual interested party.

We have since contacted the company (Dushanzi) that was quoted in the two articles asking why they cited Pirelli when Pirelli has never been their customer (see first attachment) and they replied that, in fact, they had never mentioned us (see second attachment) but that the media concerned had included our name by mistake: In the articles, they wrote that the locally produced synthetic rubber is of such a high standard that it is used for the production of racing car tyres.

While we don't know what led to this mistake, we can imagine that the aim of the article was to exult the quality of the region's synthetic rubber and so they forced an allusion to Formula 1 tyres, which are the most technologically demanding in motorsport, and which Pirelli happens to make.

In any case, Dushanzi clearly states in the attached letter that there is no link between their products and Pirelli. Dushanzi is also seeking to have the mistaken references to Pirelli removed from the two articles, even if they are now around two years old.

In light of Dushanzi's written denial and apology to Pirelli, we ask you to please remove the Pirelli name from your study. Pirelli works very hard to ensure and continually improve the quality of its supply chain from an ESG and human rights point of view, a complex and demanding job, so it is particularly distressing to be publicly associated with forced labour which harms our reputation and can potentially hurt our business.

We have no doubt about your seriousness and good faith, and therefore trust that you will see to the removal of the Pirelli name from the report as soon as possible.

We look forward to receiving your reply,

Best regards,

**Barbara Lightwood**

Communication and Brand Image

Head of Corporate, Institutional and International Media Relations

**Cease and Desist Letter from Pirelli to Dushanzi Petrochemical  
Jan 24, 2023**



Pirelli & C. S.p.A.

Milan, January 24, 2023

Xinjiang Dushanzi Petrochemical Co., Ltd  
No. 6, Beijing Road  
Dushanzi District, Karamay, PRC  
To: General Manager, Mr. Ren Junge

Pirelli & C S.p.A. / - Xinjiang Dushanzi Petrochemical Co., Ltd

Dear Sirs,

It has come to our attention that your Company has referenced Pirelli as one of its important customers, as evidenced in the articles included in Annex A and Annex B to this letter.

You will be well aware that our company has in fact never been a customer of yours and that your Company has not received any authorization from us to quote or reference our Company name or brand.

You will be aware and we hereby remind you that any use of the PIRELLI name without Pirelli's consent:

- a) Infringes our exclusive rights to the PIRELLI name because you do not have any authorization from us to use it;
- b) Represents an act of unfair competition because it is made in a way to deceive the consumers who are induced in the false belief that your Company is (or has been) anyhow associated with Pirelli, which is not the case.

It is indeed important that you are aware that, in absence of a direct and specific trademark license, no one is authorized to use the PIRELLI word mark or logo.

Therefore, we hereby require and request that your Company cease and desist from the aforesaid behaviour and withdraw any unauthorised and ungrounded statement regarding Pirelli.

We furthermore urge you not to use or reproduce in future, any of Pirelli's distinctive signs, including our Company name, without Pirelli's express prior written consent.

We look forward to receiving confirmation that you will comply with the above terms in the shortest reasonable period and in any case within ten (10) days following your receipt of this letter.

This letter is sent without prejudice to all or any rights that Pirelli has. Accordingly, all of Pirelli's rights are expressly reserved.

Yours sincerely,

"Letter of Apology" from Dushanzi Petrochemical  
March 31, 2023

## 致歉信

### Letter of Apology

Pirelli Tyre S.p.A:

贵公司信函已收悉，我们对在新闻报道中错误地提到了倍耐力的名字表示歉意，那是一个无意的错误，我们确实意识到我们的产品与贵司之间没有任何联系。Your letter has been received, and we apologize for having wrongly included Pirelli name in the news reports, that was an unintentional mistake and we indeed recognize that there is no link between our products and your Company.

报道中出现事实性出入，系记者采访时，将受访者提供的“我公司生产出可制备赛车轮胎等超高性能轮胎材料”和“倍耐力是 F1 赛车的轮胎赞助商”两个信息理解偏差错位所致，实属工作失误，本意并非想要在报道中包含贵公司。The factual discrepancy in the reports is due to the misunderstanding by the interviewer to the information provided , such as "our company has produced ultra-high performance tire materials that can be prepared for racing tires" and " Pirelli is the tire sponsor of F1 racing". This is a work mistake and not intended to involve your company which we did not intend to indicate among.

我公司已协调有关新闻单位，整改报道内容。“中新网新疆频道”、“克拉玛依零距离”均已从报道中删除了“倍耐力”相关文字。We have coordinated with relevant news units to rectify and revise the content of the report, and "Xinjiang Channel" and "Karamay Zero Distance" have deleted the text related to "Pirelli" from their reports.

我公司已责成采编人员通过此事举一反三吸取教训，并承诺今后会多加注意。We have instructed our editorial staff to learn from this incident and promise to be more attentive and more rigorous to such matter in the future.

Best Regards.

独山子石化公司  
Dushanzi Petrochemical Company

2023 年 3 月 31 日  
March 31, 2023



# GENERAL MOTORS

December 2, 2022

Hi Laura,

Thank you for reaching out and providing us the opportunity to address your upcoming report. Please find the statement below as our response.

We actively monitor our global supply chain and conduct extensive due diligence, particularly where we identify or are made aware of potential violations of the law, our agreements, or our policies -- such as our Supplier Code of Conduct, which is guided by the United Nations Global Compact. We use this process on a case-by-case basis to investigate issues, substantiate claims, establish the facts and act rapidly to determine the appropriate solution on a case-by-case basis, up to and including the termination of business relationships.

General Motors has a robust Supplier Code of Conduct and purchase contract Terms and Conditions that set forth expectations for ethically responsible social, business and environmental practices. Our Terms and Conditions clearly state our prohibition against any use of child labor or any other form of forced or involuntary labor, abusive treatment of employees or corrupt business practices in the supplying of goods and services to GM.

Our Code of Conduct is guided by the United Nations Global Compact, which GM signed in December 2015, and prohibits:

- Harassment and discrimination;
- Slave and forced labor;
- Employment of underage children;
- Human trafficking; or
- Interfering with the freedom of association and the right to engage in collective bargaining.

GM's commitment to respect human rights in our supply chain is aligned with our purchasing decisions. The GM [Supplier Code of Conduct](#) outlines requirements and expectations in areas related to human rights, environmental stewardship, responsible material sourcing and responsible and lawful business practices. When we become aware of violations or alleged violations of our Supplier Code of Conduct, we respond swiftly and appropriately, up to and including the termination of business relationships.

GM's success depends in part on building positive business relationships with reputable and ethical suppliers that meet our business needs. GM maintains a Supplier Code of Conduct that sets forth our expectations for ethical conduct as well as a risk-based due diligence program for our suppliers and business partners.

GM's due diligence activities consider, among other things, safety, reputation, human rights, integrity, business requirements, compliance with laws and GM's expectations for adherence to Winning with Integrity. We engage in continuous risk assessment, using a variety of tools and cross-functional resources to better understand and mitigate risk. We provide resources to our suppliers through our GM SupplyPower portal and other channels to ensure open communication and to help suppliers understand our expectations and improve their operations.



In addition, GM is actively pursuing opportunities to localize as much of the supply chain as possible with the recognition that secure, sustainable, scalable, and cost-competitive supply chains are key to enabling an all-electric, clean transportation future.

Kind regards,

Fred Gersdorff  
Sr. Manager – Socially Responsible and Sustainable SC  
GPSC – Central Resiliency, Sustainability, and Partnerships

**VOLVO**  
**December 2, 2022**

Dear Laura,

Thank you for reaching out to Volvo Cars and giving us the opportunity to provide input to your questions and findings on your latest research. Volvo Cars is a company committed to responsible business and cascading such commitment throughout our supply chain is a cornerstone of our Sustainability journey that we take very seriously.

In the attached document, you will find our formal response to your questions.

Please do not hesitate to reach out to me if you have any queries based on the information provided!

Best regards,

Eva Bennis

Head of Procurement Sustainability| Central

**Volvo Cars' answers to questions raised by Sheffield Hallam University, Helena Kennedy Centre for International Justice. 2022-12-02**

*Thank you for reaching out to us. Please find our answers to your questions with a deadline of December 4 2022 below.*

**Question:** Can you confirm that your company is indeed a customer of one of the listed companies (or their subsidiaries or parent companies)? Please name all of your company's suppliers on these lists and the material/product your company sources from them, and the percentage of your supply of that material/product that comes from the named company.

**Answer:** Being an automotive company Volvo Cars has global and complex supply chain. We are actively increasing the traceability throughout our supply chain and enhance our due diligence

efforts even further to ensure that there is “no forced labor of any kind relating to Volvo Cars’ business, products and services”, as stated in Volvo Car Group Code of Conduct for Business Partners. The companies that are part of our supply chain is business sensitive information. However, as we have communicated before we signed a long-term agreement with the battery maker CATL in 2019. We take information about potential violations of our Code of Conduct for Business Partners very seriously. We will launch an investigation to follow up on any allegations highlighted in the report related to Volvo Cars.

**Question: Can you tell us what, if anything, your company has done to respond to allegations of forced labor in the XUAR?**

Answer: Committing to Volvo Car Group Code of Conduct for Business Partners is a precondition to supply to Volvo Cars. We are running several initiatives to increase the traceability throughout our supply base and enhance our due diligence efforts even further to ensure that there is “no forced labor of any kind relating to Volvo Cars’ business, products and services”, as stated in our Code of Conduct for Business Partners. We are also part of CSR Europe – the facilitator of [www.drivesustainability.org](http://www.drivesustainability.org), a network of 15 OEMs working on enhancing supply chain sustainability.

**Question: Can you tell us what, if anything, your company has done to ensure your imports comply with the U.S. Uyghur Forced Labor Prevention Act ban and other due diligence legislation/standards regarding products made in whole or in part in XUAR, and/or?**

Answer: Committing to Volvo Car Group Code of Conduct for Business Partners is a precondition to supply to Volvo Cars. We are continuously working to increase the transparency in our supply chain and proactively identifying potential violations of our Code of Conduct for Business Partners, through our due diligence processes. We do this through a thorough approach, which includes desktop self-assessments, audits and site visits. We take information about potential violations of our Code of Conduct for Business Partners very seriously. We will launch an investigation to follow up on any allegations highlighted in the report related to Volvo Cars.

**Question: Can you tell us what, if anything, your company has done to actively prevent the use of forced labor among your suppliers and sub-suppliers?**

Please see the previous answers.

**HONDA**

**December 4, 2022**

Dear Laura,

Thank you for your enquiry.

Honda Motor Company do not discuss our specific supplier relationships, but utilise Honda’s Global Sustainability Guidelines that our suppliers are mandated to follow. This increasingly strengthens the confirmation of supplier ESG compliance which is coordinated at a global level.

Regards  
John

John Kingston  
General Manager  
Corporate Communications and Motorsport

Honda Motor Europe

**KOHLER**

**December 4, 2022**

Dear Professor Murphy,

Thank you for your email and information. Kohler Co. is committed to ensuring our global supply chain is free from the use of forced labor, human trafficking, and slavery.

We believe it is important to work with suppliers and partners who share our values and our commitment to lawful, ethical, and fair practices throughout their operations. Our suppliers are required to adhere to the [Kohler Supplier Code of Conduct](#), which communicates our expectations that all entities doing business with Kohler Co. maintain our high ethical standards, comply with the UN Guiding Principles, and adhere to the laws of the countries in which we produce, buy, and sell our products. Suppliers must be able to demonstrate compliance with the Supplier Code of Conduct at our request.

As part of our commitment to ensuring that we source from responsible suppliers, we continue to evolve and improve our [Responsible Sourcing Program](#) with the goal of reducing risk of human rights and forced labor issues within our supply chain. Our approach to supplier engagement is one of continuous improvement, working with our suppliers to identify, remediate, and prevent issues, thereby providing the best outcome for workers, suppliers, and our business. Collaborative partnerships are our goal; however, we do reserve the right to terminate business at any time for noncompliance.

Regards,  
Todd Weber

**BMW**

**December 5, 2022**

Dear Mrs. Murphy,

Regarding your questions we can give you the following information:

Compliance with environmental and social standards is an integral part of the BMW Group's corporate culture. The BMW Group is expressly committed to this.



When selecting our suppliers, we evaluate all suppliers worldwide according to the same criteria. These include high requirements for quality, productivity and flexibility in supplying parts. Innovative capabilities and environmental and social sustainability are other very important criteria.

Since 2014, all direct suppliers of the BMW Group have been contractually obliged to comply with extended environmental and social standards and to introduce management systems for occupational health and safety and environmental protection. These requirements must also be contractually passed on to sub-suppliers and compliance with them must be verified.

The BMW Group continuously monitors compliance with the requirements through a variety of assessments. Potential breaches of the required standards are followed up by a dedicated Supply Chain Response Team. If necessary, an escalation process is initiated and corrective action plans are developed with the supplier. If a supplier fails to take effective corrective action, this can ultimately lead to the termination of the business relationship by the BMW Group.

We ask for your understanding that, as a principle, we do not disclose individual suppliers in our supply chain.

More details can be found here: <https://www.bmwgroup.com/en/sustainability/our-focus/environmental-and-social-standards.html>

Kind regards,  
Sandra Schillmöller

**BMW Group**  
Sandra Schillmöller  
Konzernkommunikation und Politik (AK-31)  
Pressesprecherin Einkauf und Lieferantennetzwerk  
Spokesperson Purchasing and Supplier Network

**TRAFIGURA**  
December 5, 2022

Dear Professor Murphy

Thank you for your email. The following response can be attributed to a Trafigura spokesperson:

"Trafigura does not purchase product from the Xinjiang region to deliver to international customers, including for the automotive industry."

Kind regards  
Victoria

Victoria DIX  
Head of Media Relations | Corporate Affairs

**December 5, 2022**

**[In response to a series of questions regarding the evidence provided in the report regarding Trafigura being named as a top customer of XJNF, Xinxin, and Zijin, and of its holding equity in Tianshan Aluminum]**

Dear Laura

Thank you for your email. The following can be attributed to a Trafigura spokesperson:

To reiterate, the Group has no investments in Tianshan Aluminum. This is evident from our 2021 full year report onwards.

The companies that you've listed include operations outside of China, for example in Africa and Europe. As we've stated, Trafigura does not purchase product from the Xinjiang region to deliver to international customers.

Kind regards  
Victoria

**December 6, 2022**

**[upon publication of the report on this date]**

Dear Dr Murphy

Would it be possible to update the page on Trafigura in your report published today to reflect our responses below please?

Many thanks

Kind regards  
Victoria

We followed with a letter indicating that we had included the first Trafigura statement but could not find evidence of the claims made in the second letter and requesting evidence of the transfer of the Tianshan equity, as well as information regarding to whom the company

does sell its Xinjiang sourced materials. We received no response to those requests and cannot locate documentation of the transfer.

## VOLKSWAGEN

December 7, 2022

Dear Laura,

First I would like to thank you for your inquiry and please apologize, that we were not able to meet your deadline as our internal processes took a little more time to evaluate all information you have been asking for.

Please find below our statements regarding your questions:

- The Volkswagen Group takes its corporate responsibility very seriously. Respect for human rights is the ethical basis of our business activities. We stand for individual freedom, fair working conditions, open world trade, economic development and peaceful coexistence, and we condemn any form of discrimination. Therefore we reject forced labor and all forms of modern slavery including human trafficking. This includes work carried out involuntarily by people due to intimidation, penalty or threat of being disadvantaged (e.g. debt slavery or involuntary prison labor). Employment relationships are based on voluntary participation and can be terminated at any time by the employees of their own free will and within a reasonable period of notice.
- As a global acting company, we share and live by our values worldwide. Cooperation with our sites, controlled companies and direct suppliers is based on our corporate values and principles, including our Social Charter (e.g. respect for minorities, social and employment standards).
- The Volkswagen Group has a Code of Conduct for Business Partners. This details the Group's expectations regarding the attitude and conduct of business partners in their corporate activities, particularly with regard to suppliers and sales partners. The requirements are regarded as the basis for successfully shaping the business relationship between the Volkswagen Group and its partners. They include observance of human rights, such as the prohibition of child labour, human trafficking and slavery, as well as ensuring environmental protection and preventing corruption.
- Business partners must reject all conscious use of forced and compulsory labor as well as all forms of modern slavery and human trafficking. Bonded labor or involuntary prison labor are not acceptable. We require that employment relationships are entered into on a voluntary basis and may be terminated by employees at their own discretion and within a reasonable notice period.

- Suppliers have to accept our sustainability requirements and commit to fulfilling them to enter into a business relationship with the Volkswagen Group. Our direct suppliers are expected to pass on these sustainability requirements to their business partners throughout the supply chain. Since 2019, we have been assessing the sustainability performance of our relevant business partners with a Sustainability Rating (S-Rating) prior the final sourcing decision. If a supplier does not meet our requirements for compliance with sustainability standards, it is fundamentally not eligible for the award of contracts. There is thus a direct incentive for suppliers to improve their sustainability performance.
- However, if the Volkswagen Group learns of allegations, it investigates them immediately by using our “Supply Chain Grievance Mechanism”. Serious violations such as forced labor could result in termination of the contract with the supplier if mitigation measures fail. That is why we review and actively use our existing processes and seek new solutions to prevent forced labor in our supply chain. The mechanism is accessible via our website, an email address and an anonymised channel and is open to all stakeholders and potentially affected persons such as employees of suppliers, social organisations or representatives of communities in the immediate vicinity of our production sites. The cases are handled according to a binding policy, managed by the Group and processed together with the Volkswagen Group brands and regions.
- The Volkswagen Group takes its corporate responsibility for human rights very seriously in all regions of the world – including China – adhering closely to the UN Guiding Principles on Business and Human Rights. These principles form part of the company's Code of Conduct. Throughout the world, Volkswagen stands firmly against forced labor in connection with its business activities. We not only set high standards within the Group, but also work to maintain these values throughout the supply chain. Today, we already implement processes to protect human rights and systematically determine our risks, developing measures to prevent human rights violations on this basis.
- We actively use our Sustainability Rating (S-Rating) in this context. Volkswagen AG implements a thorough partner and supplier selection process and monitoring measures worldwide. Suppliers in the People's Republic of China directly commissioned by the Volkswagen Group are already included in the “Scope of Sustainable Purchasing” and commit to complying with our Code of Conduct for Business Partners.
- To make it clear: We strictly oppose any form of forced labor in all our business operations.
- It is a fact of life that plants cannot be built or closed down overnight. Investments have a decades-long horizon. Furthermore, the impact on employees at a plant must be taken into consideration. That also applies to the joint venture plant in Urumqi. Moreover, all employees at the joint venture plant in Urumqi are employed directly by SAIC VOLKSWAGEN.
- We found no evidence that SAIC VOLKSWAGEN employees are forced to work there. Employees are hired on the basis of their skills – irrespective of age, religious beliefs or ethnic origin.
- The majority of employees have been working there since the opening of the SAIC Volkswagen plant in 2013. We are not aware of any cases where employees of SAIC VOLKSWAGEN were or are in internment camps.

- The proportion of Uyghurs and other minorities remains at around 27 percent. This corresponds to the ethnic composition of the population in the Ürümqi region.
- SAIC VOLKSWAGEN also has a code of conduct, a whistleblower system and an external ombudsman system to prevent or detect possible misconduct or violations.
- Xinjiang has been affected by lockdowns due to Covid-19 for the past two years. In 2021, shutdown days were also added at the Ürümqi site due to the semiconductor shortage. As a result, the number of vehicles manufactured dropped significantly last year. The number of employees was reduced by around 1/3 from the original level of around 600. at around 27 percent.
- Overall, production at all plants in China continues to be significantly impacted by the lack of availability of semiconductors and COVID-19 restrictions, as well as the resulting limited logistics.

I would very much appreciate if you could update all published reports accordingly.

Thank you very much for your kind understanding and your patience.

Regards,

Nicolai Laude  
 Director Litigation Communications, Issue & Incident Communications  
 Volkswagen Group Communications

**December 7, 2022**

**[In response to a further query to explain relationships to suppliers listed in report and inquiries as to whether the comments regarding slow processes to open and close factories was a suggestion that the VAW-SAIC plant may be in the process of closing]**

Dear Laura,

Due to confidential agreements as part of our usual contracts with all our suppliers we do not comment on individual suppliers in general.

Please allow me to underline, that this plant is not a "VW plant". It's operated by a JV in which we are a non-controlling partner. Making clear that we cannot close or open or reallocate any plant on short notice does not allow conclusion that the operating JV is considering closing this plant.

Regards,

Nicolai

# CONTINENTAL

February 9, 2023

Dear Laura,

it is my pleasure reaching out to you. I am the Responsible Value Chain Officer for our Group Sector Automotive.

You can imagine that your report provided us with valuable information and kept us quite busy and at the same time.

We very carefully checked the report and the sources and took appropriate actions.

We noticed that the only source for the connection between Continental and Deren is the information on Derens English website.

After diligently reviewing our business portfolio and supply base, we could deduct that the business relation with Deren was ended already a few years back. We engaged Deren with this and in the meantime, they updated the information accordingly.

How do you suggest to continue with this? I am also curious to understand which directions you take for further analysis in your research field and how we as responsible businesses can benefit from it.

Keep up the good work!

Have a good day and best regards,

Florian

**#CallMeFlorian #GernPerDu**

Mit freundlichen Grüßen / Best regards,

**Florian von Reitzenstein**

Manager Responsible Value Chain &

Automotive Responsible Value Chain Officer

Automotive Sustainability

Automotive

**Besucheradresse / Visitor address:**

Continental Automotive Technologies GmbH

# Joyson Safety Systems

August 4, 2023

Professor Laura Murphy, PhD  
Sheffield Hallam University

By E-Mail

4 August 2023

Dear Professor Murphy,

We refer to your report *"Driving Force: Automotive Supply Chains and Forced Labor in the Uyghur Region"* (the **"report"**) published in December 2022, which raised allegations against the Jingzhou plant operated by a subsidiary of Joyson Safety Systems (**"JSS"**) in China.

Unfortunately, we were not given any opportunity to respond to the allegations before the report was published. By this letter, we now comment on the allegations made in the report regarding JSS group companies. In addition, we set out some details on our wider compliance approach with respect to supply chain and forced labor concerns.

JSS's Code of Ethics and Business Conduct (the **"Code"**) prohibits the use of any form of forced labor at JSS facilities or at the facilities of our suppliers. Accordingly, JSS takes allegations of the nature made in your report with great seriousness.

Following the publication of the report, as a precautionary measure, we began working with outside counsel and independent 'social compliance' experts (ELEVATE<sup>1</sup>) to review the allegations raised in the report in order to confirm and report to us on the labor conditions and social compliance position at the Jingzhou plant.

The review found the allegations to be unfounded. Specifically, it confirmed that the JSS Jingzhou plant is not a participant in any labor transfer programs nor otherwise involved in any forced labor.

The review included a social and environmental compliance audit of the Jingzhou plant by respected third-party auditor, ELEVATE. The audit found that there were no zero-tolerance<sup>2</sup> or critical issues<sup>3</sup> (i.e., no instances of forced labor) at the Jingzhou plant. The audit also found no business ethics, environmental or management system issues.

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<sup>1</sup> ELEVATE is one of the leading business risk and sustainability professional services firms specializing in 'social compliance', namely continuing processes by which organisations endeavor to protect the health, safety, and rights of their employees, the community and environment in which they operate, and the lives and communities of workers in their supply and distribution chains.

<sup>2</sup> "Zero tolerance issues" refer to the most severe violations under ELEVATE Responsible Sourcing Standard (ERSA), including for example child labor, forced labor, bribery or bribery attempt to assessors, and physical and sexual harassment and abuse.

<sup>3</sup> "Critical issues" refer to violations that impose less severe impacts on labor and environment than zero tolerance issues but require immediate attention and resolution, including for example lack of accurate or true payroll and time attendance records for review, verbal harassment and abuse, excessive recruitment fees and restriction of movement.

Please also note that neither JSS nor any of our affiliates operate any facility or run any operations in the Xinjiang Uyghur Autonomous Region, the region primarily at focus in your report.

We take this opportunity to confirm that, at JSS, acting with ethics and integrity is central to how we conduct our business. We recognize our social responsibility to respect human rights, and we equally acknowledge our responsibility to consider and address the impact of our operations on the human rights of our employees, workers in our supply chains and other stakeholders. We support international efforts to protect human rights, including absolute opposition to forced labor and any other form of modern slavery. Those inalienable principles are set out in the Code and form the basis of our Global Ethics and Compliance Program.

JSS conducts its business in ways which ensure compliance with these principles throughout our supply chain. When selecting suppliers or vendors, we do not only assess their ability to meet their contractual obligations and to satisfy our and our customers' business and technical needs and requirements. We must also equally be satisfied of their commitment to compliance with applicable laws safeguarding human rights and fair working conditions and conducting themselves in a manner consistent with our Code and JSS's robust Supplier Code of Conduct (the "SCoC") (which are informed by and reflect the United Nations Global Compact).

Our Code and the SCoC are available at our website (<https://www.joysonsafety.com/en/sustainability/> → Compliance Program). At our website you will also find further details regarding our commitment to respecting human rights and fair working conditions. Our general terms and conditions for purchasing require suppliers and vendors to comply with our SCoC and applicable laws safeguarding human rights and fair working conditions. Our SCoC, in turn, includes prohibitions against suppliers' use of forced labor, and further requires all suppliers to communicate the contents of the SCoC to any third parties they engage with and to implement systems designed to ensure those third parties' compliance.

We expect (and take steps to verify) that our suppliers implement measures to ensure that there is no forced labor in the supply chain for any JSS products. JSS communicates with and provides resources to its suppliers, including by providing training on our SCoC (which is disseminated through SAI Global) to ensure that our suppliers understand our expectations.

JSS is further enhancing its supplier due diligence to include more robust watchlists/adverse media screenings for human rights concerns, global supply chain mapping (using a supply chain management solution) and a risk-based sustainability compliance audit program for suppliers covering human rights and labor conditions, among other steps. These efforts are designed to ensure that we meet our commitments to



respect human rights and are fully compliant with new supply chain due diligence legislation.

We encourage our employees, suppliers and other stakeholders to report any suspected breaches of our Code or the SCoC, including any suspected violations of human rights and fair working conditions laws and regulations, where JSS or any of its representatives are believed to be involved.

Concerns can be reported through internal and publicly available grievance channels described in our Code, the SCoC and our website, including but not limited to our Compliance Hotline (<https://jss-speakup.com/>). Concerns may be raised anonymously wherever permitted by local law. We prohibit all forms of retaliation against people who report concerns in good faith. Where reporters identify themselves, every effort will be made to keep their identity strictly confidential within JSS. We respond to complaints in a timely manner, and any report received through the reporting channels will be reviewed, analyzed, investigated and acted upon appropriately.

To learn more about our grievance procedures, please visit our website ([Sustainability / Joyson \(joysonsafety.com\)](https://jss-speakup.com/)) → Reporting Compliance Concerns)

We trust we have explained in this letter our commitment to social and environmental compliance and the basis upon which we believe the allegations in the report regarding JSS group companies are unfounded.

We request that you include this formal public response to the report at its Annex B and at the websites under your control at which the report appears.

Yours sincerely,

Sven Petersen

Executive Vice President  
General Counsel, Chief Compliance Officer  
Joyson Safety Systems

# Hoshine Silicon Industry Co., Ltd.

November 14, 2023

## **23.11.14 - Letter to Helena Kennedy Centre for International Justice**

Dear director of the Forced Labour Lab at the Helena Kennedy Centre for International Justice of Sheffield Hallam University,

I am Laura Zhu, the sales manager of Hoshine Silicon Industry Co., Ltd. (hereinafter “Hoshine Silicon”) and I noted that the Lab mentioned so-called “forced labor” in Hoshine Silicon’s subsidiary in Xinjiang in your reports “IN BROAD DAYLIGHT——Uyghur Forced Labor and Global Solar Supply Chains” in May 2021 and “DRIVING FORCE——Automotive Supply Chains and Forced Labor in the Uyghur Region” in December 2022. In June 2021, U.S. Customs and Border Protection (CBP) added Hoshine Silicon and all of its subsidiaries to the WRO’s Entity List and these companies are also subject to the UFLPA Entity List implemented in June 2022. CBP not only listed Hoshine Silicon’s subsidiary in Xinjiang, but also listed its parent company (Hoshine Silicon) and other subsidiaries, which are located thousands of kilometers away from Xinjiang and have no relationship with Hoshine Silicon’s subsidiary in Xinjiang. This has caused a serious impact on Hoshine Silicon’s reputation and daily operations. After our research, we believe that CBP’s designation of Hoshine Silicon on the WRO Entity List is in large part based on the reports of Labour Lab.

The purposes of our writing this letter to you are, firstly, to clarify the allegations of forced labor mentioned in your report; secondly, to update you on the latest situation of Hoshine Silicon; thirdly, to establish contact to enhance our understanding and eliminate misunderstandings, and invite you and your team to visit Hoshine Silicon’s facilities at an appropriate time for an on-site audit to get a better understanding of Hoshine Silicon’s real situation.

First of all, Hoshine Silicon is a listed company located in Zhejiang Province in eastern China that specializes in silicon-based products and constructs silicon-based products and downstream products production facilities in Zhejiang, Xinjiang, Yunnan, Sichuan and Heilongjiang provinces. Among them, there are Eastern Hoshine, Western Hoshine and Central Hoshine production bases constructed in Xinjiang. In conclusion, Hoshine Silicon has subsidiaries with

independent legal status in various parts of China, which utilize the advantages of industrial clusters to produce silicon-based products. They are independent of each other and independent from the subsidiaries in Xinjiang both in terms of legal status and raw material supply and there are no related transactions. However, CBP listed subsidiaries that are unrelated to Xinjiang in the WRO Entity List. We intend to file a lawsuit in the U.S. Court of International Trade and we will learn the reasons why the CBP listed non-Xinjiang subsidiaries on the WRO Entity List with the disclosure of evidence and the U.S. Government's Administrative Record. We will take the next step of judicial measures based on what we have learned and return fair treatment to Hoshine Silicon's non-Xinjiang subsidiaries.

It is inevitable that there are local employees from all over China, including Han Chinese, Uyghurs and other ethnic groups, because Hoshine needs local people, and local people need to work to raise a family. However, for both Han Chinese and Uyghur employees, Hoshine provides equal pay for equal work and all employees enjoy the same treatment. If Hoshine does not employ Uyghurs or does not give them the equal treatment, which means that Hoshine discriminates them in employment. This is not only illegal in China, but also not allowed in Western societies. If Hoshine refuses to employ Uyghurs, they will lose the opportunity to work and the ability to support their families. If you have the opportunity to come to Xinjiang, you can communicate individually with the Uyghur employees recruited by Hoshine and get a first-hand insight of whether Hoshine treats Han Chinese and Uyghur employees equally in recruitment and employment, and whether there is "forced labor" alleged in the reports. We hope that you take this opportunity to re-identify whether forced labor exists.

For the identification of forced labor, reference is usually made to the 11 ILO indicators of forced labor, which are: abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, excessive overtime. The criterion for identifying the existence of forced labor is not race or gender, nor should it be the unsubstantiated accusations made by emigrated Uyghurs, who are hostile to the Chinese government and wear tinted glasses and racial hatred to publicize the so-called forced labor in Xinjiang, not for the sake of Xinjiang's development and prosperity as well as a better life for Uyghurs in Xinjiang. Instead, they used so-called human rights as a mean to gain the sympathy

of other Governments and in turn to hope that they impose sanctions on China in order to achieve other political purposes.

The criterion for identifying the existence of forced labour is the 11 internationally recognized ILO indicators of forced labour, and allegations of the existence of the 11 indicators of forced labour should be verified, not based on speculation or the unverified “testimonies” of individuals. The authenticity of evidence needs to be cross-examined, and no single piece of evidence should be used to substantiate the existence of forced labor in a public report.

Otherwise, many companies would suffer the injustice. We definitely promise that the 11 indicators of forced labor do not exist in Hoshine Silicon’s subsidiaries in Xinjiang, and we hope that you and your team come to the companies to verify whether there are any allegations of the 11 indicators of forced labor against the Uyghur workers. At the same time, my testimony should also be cross-examined.

Secondly, Hoshine’s facilities in Xinjiang has undergone radical changes in the past years, which is the inevitable result of economic and technological development. With the general application of high technology and improvement of corporate competitiveness, the production mode and technical level of Hoshine Silicon’s facilities in Xinjiang have made a qualitative leap. Hoshine Silicon has technically improved and upgraded the original industrial silicon facility, realizing semi-automated or fully-automated production, and no longer needs a large number of industrial workers; the newly-built facility is designed and constructed in full accordance with the modernization requirements, realizing fully-automated production and management. Except for special parts such as maintenance and inspection of safety production, there are no longer any front-line workers. Regardless of whether facility is renovated or newly-built, the working environment is cleaner and more environmentally friendly due to automated production, meeting and exceeding the relevant environmental and labor auditing standards. (Please see attached photos<sup>4</sup>) If Hoshine Silicon was to remain at the backward level of production technology and efficiency that relied entirely on manual labor in the past, it would be impossible for Hoshine

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<sup>4</sup> Please see the attached photos of the facility environment, the attachment 1 shows the industrial silicon automated production workshop; the attachment 2 shows the automation control center of downstream of silicon-based industry chain.

Silicon to stand firm in the modern fierce market competition, let alone become a global leader in the silicon-based industry.

Hoshine Silicon not only emphasizes production and operation, but also attaches great importance to the construction of corporate humanistic culture and ESG. Hoshine Silicon has established the Anti-Forced Labor System, promulgated the Hoshine Supplier Corporate Social Responsibility Management Manual, formulated policies and procedures against forced labor and implemented specific measures. Hoshine Silicon has also conducted social responsibility audits at the request of the clients, such as SMETA and TFS and so on, the results of these audits show that Hoshine Silicon's facilities are in full compliance with the standards of SMETA and other corporate social responsibility audit.

Finally, we understand that due to the differences in the specific era environment and culture, as well as unsubstantiated allegations made by individuals, you and your team made a description of Hoshine Silicon in the reports that was not consistent with the actual situation. As mentioned above, these contents have brought Hoshine Silicon an immeasurable negative reputational impact as well as huge economic losses. They have also indirectly affected the income of Hoshine Silicon's employees, including the income of the Uyghur workers of Hoshine Silicon's subsidiaries in Xinjiang, which affected the protection and improvement of their family living standards. We believe this is inconsistent with your original intention of writing those reports, which was to want them to have decent jobs and good incomes. Through this email, we hope that we can establish a communication channel of mutual trust so that you can learn the real situation and eliminate misunderstandings. We also hope that in the future you will report the real situation that you have learned, to clarify the misunderstanding of Hoshine Silicon, as well as to eliminate the negative impact on Hoshine Silicon.

Thank you. Looking forward to hearing from you.

November 14, 2023

**Attachment 1 – Industrial silicon automated production workshop**



**Attachment 2 – Automation control center of downstream of silicon-based industry chain**



# Kumho Tire

July 8, 2024

Forced Labour Lab Email

Sheffield Hallam University

By Email

Dear Professor Ms. Murphy,

This is ESG Team of Kumho Tire.

We are writing to provide some information on about involvement with forced labor in the Uyghur Region throughout our supply chain.

Recently, we recognized that Kumho Tire was cited as a buyer of raw materials from "Dushanzi", a company operating in the Uyghur Region, through your report "Driving Force: Automotive Supply Chains and Forced Labor in the Uyghur Region" (the "report") published in December 2022, as well as your website (<https://www.shuforcedlabour.org/drivingforce/>). Unfortunately, for some reason we did not get any contact to explain or respond to the allegations beforehand. By this letter, therefore, we would like to explain about the allegations and provide detailed information about Kumho Tire's supply chain management.

Once recognizing the allegations, we reviewed our transactional history with the Raw Material Purchasing team. We confirmed that Dushanzi has never been in our procurement or supply chain for directly nor indirectly sourcing, other than only getting provided small quantities for their material testing in 2017. We also had contacted Dushanzi about this allegation, and they replied with the explanation letter (see attachment) confirming no business relationship between two companies, Kumho Tire and Dushanzi.

As a global tire maker, we take human rights issues including labor with great seriousness, especially child labor and forced labor. Kumho Tire, therefore, has implemented human rights and supply chain management system in order to mitigate relevant risks throughout its supply chain.

We established Human Rights Policy, which strictly prohibit any form of forced labor and human trafficking at our global business sites, and conduct Human Rights Impact assessment every year in order to confirm compliance with our policies, as well as to identify, mitigate, and monitor relevant issues.

In order to create a sustainable and responsible supply chain, we also established supply chain ESG management system from policies to evaluation, and mitigating actions. Kumho Tire has provided 'Suppliers' Code of Conducts', a comprehensive guideline on responsible management activities,

thereby cooperating to create a sustainable supply chain. Through the Supply Chain ESG Assessment, we annually confirm their compliance with the policy, as well as identify ESG risks within the supply chain. Suppliers with high risks or need for improvement identified from the evaluation will be supported with consultations and follow-up monitoring. We disclosed those information in our Sustainability Report (click to view).

Kumho Tire strives to secure sustainability throughout the supply chain, and has implemented its management system integrated with ESG perspective including human rights. Unfortunately, there would be some misleading by the reference article, mentioning Kumho Tire by in charge of Dushanzi.

According to the letter from Dushanzi and our transaction history confirmation, we are convinced that Dushanzi has never been in the supply chain of Kumho Tire. Therefore we ask you to please remove the Kumho Tire from your report and the websites, so that there will not occur any further allegations by referring your repo

Best regards,

ESG Team

Kumho Tire

<Attachment>

### **Description Letter**

Nanjing Kumho Tire Co., Ltd. And Kumho Tire (Tianjin) Co., Ltd. have not purchased our products since April 2018. Kumho Tire (Changchun) Co., Ltd. and Kumho (China) Tire Sales Co., Ltd. have never purchased our products, hereby explains.

Dushanzi Petrochemical Company Sales and Transportation Department

April 17, 2024



## 说明函

南京锦湖轮胎有限公司、锦湖轮胎（天津）有限公司自 2018 年 4 月至今未采购我公司产品，锦湖轮胎（长春）有限公司、锦湖（中国）轮胎销售有限公司从未采购我公司产品，特此说明。

独山子石化公司营销调运部

2024 年 4 月 17 日



# Huizhou Desay SV Automotive Co., Ltd

September 19, 2024

## Letter of Statement

Dear Professor Murphy,

With reference to your report "Driving Force: Automotive Supply Chains and Forced Labor in the Uyghur Region" (the "Report") published in late 2022, we noted a passing reference to our company, Huizhou Desay SV Automotive Co., Ltd ("Desay SV" or the "Company"), buried in Table 1 on page 6 ("Chinese-owned Companies Ranked in the Top 100 Car Parts Manufacturing for 2022 according to Automotive News and their Relationship to the Uyghur Region"). The references to Desay SV in this table allege that the Company is manufacturing in the region of Xinjiang and "owns subsidiaries in the XUAR," presumably to leave an impression that these activities are improper.

Firstly, we were disturbed not to have been given any opportunity to respond to being included in this report. Many highly reputable U.S., European and Japanese companies have objected to the conclusions and information in your report, as well as the evident lack of accurate and responsible reporting in your "study", as noted in the many letters you have disclosed in Annex B Corporate Responses. We do not think we need to restate the many inaccuracies and false conclusions that others have aptly noted in your report.

As far as the references to Desay SV are concerned, the sources you cite as references in Table 1 of your report are to an initial public offering that references that XPCC entities are three of the 6,516 investors intended to acquire Desay SV shares<sup>5</sup>. However, you do not provide any sourcing information to back up your claim that Desay SV is "manufacturing in the XUAR".

It is concerning to us that you have blithely included a reference to the Company as a footnote in a report that raises harmful and incendiary allegations around serious issues of forced labor - yet you provide no sources that support any alleged harmful conduct by Desay SV.

The Company has engaged K&L Gates LLP as the external counsel in relation to this matter. We will also involve an audit firm to review the substance of your report and to conduct an internal inquiry into this allegation to further prove its misrepresentation. This process follows a prior review by a large international customer of the Company of allegations raised by your report. That customer reviewed the supply chain involving Desay SV and found no forced labor issues with Desay SV's operations.

The Company takes all such allegations seriously, and would moreover act to deal with them if there were any substance to them. But we cannot do much with a vague and frankly inaccurate description for the sourcing relating to the allegation in your report.

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<sup>5</sup> Being listed in the referenced document ("Announcement on the Preliminary Placement Results of Desay SV IPO") merely indicates that the entity or individual is a qualified potential shareholder, and it will not be deemed as a shareholder until the share acquisition is complete. Nevertheless, in accordance with certain Chinese securities regulations, Desay SV can only identified the top 200 shareholders, in which none of the XPCC entities is included.

If you believe your allegations are valid and accurate, you may wish to provide Desay SV with any additional supporting materials beyond those mentioned in your report. Otherwise, you should remove the allegation if it cannot be substantiated.

In the alternative, given the serious financial and reputational damage that your report has inflicted, and continues to inflict, on the Company and its shareholders, should you fail to respond within one month of receiving this letter (including the exclusion of Desay SV from the Report), legal action to obtain a satisfactory retraction of these allegations is a recourse we are currently considering.

David Lin Xianwei

Senior Director of Legal and Compliance Module

Date: September 19, 2024