

# KNOW YOUR SUPPLY CHAINS: DESK-BASED RESEARCH STRATEGIES TO IDENTIFY UYGHUR REGION EXPOSURE

Issue Brief 5  
June 2023

## Introduction

Over the last several decades, as concern about forced labor increases, corporations large and small have instituted corporate social responsibility (CSR) units, auditing regimes, and other supply chain management systems to help identify risk and mediate violations where possible. Companies have worked to align their policies and disclosures with modern slavery legislation and with the United Nations Guiding Principles on Business and Human Rights.

As governments around the world work to ensure that their citizens are not consuming goods made with Uyghur and other forced labor, new legislation (such as the U.S. Uyghur Forced Labor Prevention Act, Germany's Supply Chain Due Diligence Law, and the pending E.U. Mandatory Human Rights and Environmental Due Diligence Directive and Forced Labor Regulation) is calling on companies to identify all suppliers and sub-suppliers throughout all tiers of their supply chains.

This is a significant, but not impossible, task. Supply chain tracing is particularly challenging when direct suppliers try to obscure the identities or locations of their own suppliers, provide fraudulent information, or refuse to discuss sourcing altogether. Some companies have bifurcated their supply chains, producing one line of untainted goods and another line of forced-labor made goods, and their customers may not have certainty regarding which they are receiving. For these very reasons, full and accurate supply chain tracing and risk identification is a responsibility that companies can no longer shirk, for ethical, reputational, and now legal and financial reasons.

Many paid consultants and supply chain tracing platforms now promise to identify Uyghur and other forced labor risk; we highly recommend that all businesses en-

*The fifth in a series of briefs about forced labor in the Uyghur Region, this brief provides tips for desk-based research strategies that will assist in tracing corporate supply chains and their potential exposure to the Uyghur Region.*

## Improve Your Due Diligence Strategy

- 1. Know your direct suppliers better.**  
Know your suppliers' registered names in their local languages, as well as their subsidiaries and parents
- 2. Identify your sub-suppliers.**  
Use customs records, corporate websites and annual reports, and other desk-based research to identify who your suppliers are sourcing from, all the way down the value chain.
- 3. Identify exposure to the Uyghur Region.**  
Find out whether your suppliers and sub-suppliers are operating in or sourcing from the Uyghur Region through customs records, public datasets, publicity and annual reports, and other publicly available resources.
- 4. Archive everything!**  
Don't let all this hard work disappear.

## Our Approach

Researchers and journalists have been tracing supply chain exposure to the Uyghur Region since the discovery of forced labor in internment camps in the region in 2018. The Forced Labor Lab at the Helena Kennedy Center for International Justice at Sheffield Hallam University has produced influential reports that trace international supply chain exposure to forced labor in the Uyghur Region, revealing that the solar, apparel, automotive, agriculture, critical minerals, plastics, chemicals, spices, and PPE sectors are affected. Each time a report is published, companies express surprise that their own industry is affected. They have not done the due diligence necessary to identify their own risk before a report emerges.

Unfortunately, the sectors covered by Sheffield Hallam and others reveal just the tip of the iceberg. All companies should be tracing their supply chains to the raw materials to ensure they are not complicit in this human rights crisis.

Sheffield Hallam researchers have developed a methodology that can be used across sectors to better understand direct suppliers, identify and increase knowledge of sub-suppliers (and potentially undisclosed sub-suppliers), and identify supply chain exposure to the Uyghur Region. The Forced Labor Lab is sharing this basic methodology to enable businesses and other stakeholders to take a proactive approach to their own due diligence and to enhance the likelihood of identifying problematic connections to the Uyghur Region. These steps are incredibly basic, but two years of talking with auditors and receiving statements from companies in response to our reports has revealed that, by and large, even these simple steps are not part of most companies' standard due diligence.

list the assistance of such platforms. However, the fees for these platforms can be astronomical and out of reach for some businesses. Furthermore, these platforms should not replace other avenues for conducting due diligence. **It is incumbent upon all companies to conduct more rigorous due diligence to ensure that they are in compliance with international laws prohibiting use of forced labor.**

This guidance is designed to provide procurement and CSR specialists (and other interested parties including journalists, investors, researchers, and policy makers) with research strategies that can be deployed to more adequately map suppliers and risk across value chains, particularly when they may involve Chinese suppliers. Supply chain mapping can be improved significantly with a few simple steps that companies, by and large, seem to have not pursued to date.

**A note to SMEs:** Some of the steps below may be more than your company can currently afford. Consider collaborating with an industry organization or with other businesses to conduct this research. The [“Identifying Uyghur Region Exposure”](#) section below provides a list of public datasets that compile companies that have already been identified in the media as affected by Uyghur forced labor. Those datasets may be the ideal place to start for those with limited capacity.

### PRIORITIZING HIGH RISK PRODUCTS

Supply chain tracing and forced labor risk assessment may seem daunting to companies. Small- and medium- sized enterprises (SMEs) may not employ compliance or procurement specialists that can conduct research on every supplier. Some larger companies have thousands of direct suppliers and tens of thousands of sub-suppliers, which makes the task more complicated and time-consuming.

Anyone tracing supply chains should prioritize those materials or inputs known to be at highest risk of forced labor. First, map those materials that have been reported to be affected in media and academic reports. Then, map the materials the Chinese government has prioritized for expansion in the Uyghur Region, which includes critical minerals, electronic component, renewable energy materials (including batteries), and many others. See our [“Products Made with Uyghur Forced Labor”](#) brief for details.

Desk-based research should begin with direct suppliers/shipments from China, but then should move to those in-

termediary countries that are most reliant on China for sourcing. For instance, garment retailers should begin with Chinese suppliers, and then conduct research on direct suppliers in Malaysia, Vietnam, Indonesia, Sri Lanka, and other regions that rely heavily on Chinese fabrics and accessories.

Companies often have long-standing and close relationships with their direct (or “first tier”) suppliers. Corporate partnerships create trust and rapport, and audits support a sense of confidence. Increasingly, however, companies have admitted that they have found fraud in their audits or in the supply chain management data reporting. They are often unaware of their direct suppliers’ investments, factories, or sourcing in other regions or their participation in human rights violations, corruption, law suits, etc. Many of these gaps in knowledge can be corrected through desk-based research.

## 1. Get to Know Your Direct Suppliers Better

### DETERMINE THE REGISTERED NAMES OF YOUR SUPPLIERS IN THEIR LOCAL LANGUAGES

The single most important piece of information throughout this process will be the registered names of your suppliers in the language of the country/region in which they operate. Many companies and auditors admit that they do not have this simple but critical piece of information.

The best way to ensure you have the local language name is to require that all of your suppliers and any of their sub-suppliers provide them directly (note: some of them have several). In China, the company’s official license to conduct business provides the company’s legal Chinese name. Companies should require a copy of all suppliers’ licenses.

However, if a company does not provide its registered name (or if there is any reason to believe a company may be operating under several names or changed its identity), it is possible to identify company names through desk-based research. Several subscription-based tools provide this information to enable researchers to input an English-language company name and match it with its official local-language name. This is not foolproof, but it does provide a valuable resource. You will want to cross check the names against their addresses.

*In this brief, we do not endorse any specific subscription-based services, as a matter of fairness and objectivity. We do, however, name services that are offered for free.*

In this brief, we do not endorse any specific subscription-based services, as a matter of fairness and objectivity. We do, however, name services that are offered for free.

Another option is to visit the company’s website, if they have one. If the company has a multilingual website, switch to the Chinese site. Typically, if you scroll all the way to the bottom of the page, the Chinese name of the company will be included in the footer. If you do not read Chinese, you can compare the English-language site with the Chinese-language site to find places where the name is mentioned and copy it from the Chinese site. All companies in China end with the word company (公司), so you can use that as a guide to finding company names using your browser’s search function (Ctrl+F).

In China, it is also useful to have the company’s 18-digit Unified Social Credit Code. This is a unique identifier assigned by the Chinese government to all companies. This information is also included on the company’s license. (The Chinese government’s [National Enterprise Credit Information Publicity System](#) is designed to assist, but its CAPTCHAs often require Chinese-language skills, and use of the site for more than one company sometimes leads to a request for registration.) Once you have the Chinese name, you can search the [GWBMA](#) corporate registry portal or others available online to find the company’s social credit number. (With a paid subscription or additional fee, GWBMA will provide additional information, much of which can be gathered elsewhere for free. See below.) [Hong Kong](#) has an English-language corporate registry portal that makes this process simpler for companies operating under its jurisdiction. [China Trade Blog](#) has a useful explainer on the social credit code system. All social credit codes reveal the registration location of the company in digits 3–8 (see image on following page).

Each company's 18-digit social credit code includes a set of numbers that identify the region in which the company is registered.

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x
Registered Authority	Registered Entity Type	Registered Region						Organization Code									Check Digit

It is also possible to hire companies online to search for official corporate names and credit code numbers. Depending on the number of suppliers you have, it should be possible to have most, if not all, of your suppliers' official registered names in a short time.

Of course, this process should be applied to any designated sub-suppliers beyond the first tier as well. See the next section for ways to identify potential sub-suppliers.

### IDENTIFY YOUR SUPPLIERS' PARENT COMPANIES, SUBSIDIARIES, AND SISTER COMPANIES AND THEIR LOCATIONS

Though a supplier may be located outside the Uyghur Region, its parent company and all or part of its production may still be in the Uyghur Region or your supplier may hold its own subsidiaries or joint ventures in the Uyghur Region. Many Chinese apparel companies, for instance, manufacture fabric and finished clothing in Shandong, Jiangsu, or Zhejiang, or even Vietnam or Cambodia, but they (or their parent companies) have subsidiaries in the Uyghur Region that provide them with their cotton, polyester, Lyocell, elastane, yarn, fabric, etc.

Though your supplier may attest that they are not sourcing from the Uyghur Region, subsidiaries and sister companies located there present a significant risk. It is critical that you know if these risks exist and determine whether your company will continue its risky sourcing from a company that also operates in the Uyghur Region. See our [“Common Concerns about Addressing Uyghur Forced Labor Brief,”](#) where we explain that companies ideally should disengage with entire corporate groups that hold subsidiaries in the Uyghur Region. At the very least, a company should have explicit contractual agreements with their suppliers naming their subsidiaries (or parents' subsidiaries) located in the XUAR and guaranteeing that they will not source from those subsidiaries. Further receipt requests and supply chain audits should confirm this agreement is being adhered to.

Ideally, direct suppliers should provide you with the name

## Deploying Google Translate

Ideally, every large procurement or CSR team should have members that are fluent in Chinese, given the extent to which supply chains are reliant on Chinese manufacturing. However, even those without Chinese language skills can conduct this due diligence research.

Google Translate is now quite accurate in translating Chinese and most other languages. You can translate small portions of text or even whole documents on the main [Translate page](#). You should also allow [Google Chrome](#) to automatically translate text when you encounter foreign language websites. Once you have that enabled, you can toggle back and forth between languages through an icon in the URL bar or through right clicking and selecting “Translate to English.” If you cut and paste Chinese language (or other languages you do not know) into the search bar, Google will return results in that language. This will allow you to search the Chinese-language internet and read sources that are only available in Chinese.

Google Translate translations will not always be 100% accurate, but you should be able to derive the substantial information from translated documents and webpages. You should always rely on a person skilled in Chinese language before making any legal decisions or actions.

of their parent and a list of all of the company's (and parent's) subsidiaries (in both English and the local language), as well as identify any sourcing relationship they have with each. If that information is not forthcoming, there are several ways to identify a company's subsidiaries.

First, you can check the company's websites and their public profile on corporate registry sites such as [Aiqicha.com](https://www.aiqicha.com). It is often easier to access a site like this by using your search engine to search for "Aiqicha" and the company's name in Chinese. A search for the company's Chinese name alone should result in several different corporate registry sites that will provide basic information about the company, including its official registered street address and province, parents, and subsidiaries.

Another option is to review your suppliers' annual reports, if they are publicly listed. Their annual reports (or their parent companies') should have a list of all subsidiaries. English language versions of annual reports for companies listed on US stock exchanges are available at the U.S. Securities and Exchange Commission [EDGAR portal](https://www.edgar.gov). If you have access to Bloomberg Terminal through a business subscription, you can access names of parents and subsidiaries machine-gleaned from annual reports.

Once you have the registered names of your suppliers, and their parents and subsidiaries, in their local languages, you can search corporate registries like Aiqicha to determine whether any of their addresses are in the Uyghur Region. See below for some names of cities in the region, but the addresses will almost always include the province/region name.

## WARNING

Conducting research on the Uyghur Region can present a digital and human security risk. Researchers are advised to use a VPN while conducting this research. People working within China and Hong Kong may not be able to access this information, and it may not be safe to ask them to conduct this work.

## 2. Identify Actual And Potential Undisclosed Sub-Suppliers

Even if your company does not sell finished goods that were manufactured directly in the Uyghur Region or even in China, it is possible that some part of your supply chains may be located there, whether it be at the raw material mining or farming stages, in the processing of raw materials, or in pre-manufacturing stages.

Many companies rely on attestations regarding sourcing and commitments to a supplier code of conduct as evidence that their suppliers are free of forced labor and free of Uyghur Region sourcing. In the current environment, this level of trust is no longer warranted. Companies have sometimes reported to us that their Chinese suppliers have cut ties with Uyghur Region suppliers, only for us to provide them with clear, easily accessible evidence to the contrary. Suppliers may source a portion of their materials from the Uyghur Region, and then promise all of their customers that they are receiving the untainted portion of their goods, and companies often simply believe these statements without further evidence.

Knowing where your direct suppliers are receiving all of their inputs (not just those they claim to use for your products) is now critical information for any company that wants to eliminate or remedy exposure to the Uyghur Region. The following steps will assist in that process.

### CUSTOMS RECORDS

In order to avoid exposure to the Uyghur Region (and to lower total costs, including risks, reduce supply chain disruptions, etc.), many companies partner with suppliers in South and Southeast Asia. However, many of those companies are sourcing from China. Many of them are owned by Chinese individuals, businesses, or the state. One way to determine who your non-Chinese suppliers are buying from is to use customs records.

The Chinese government does not publish its customs records, so it is difficult to see to whom Chinese companies are shipping and even more difficult to see any transport of goods within the country. However, many countries do publish their customs records, including both imports and exports. The U.S. publishes its sea-freight shipping records, which can be accessed for free through [Import Yeti](https://www.importyeti.com). Indonesia, Sri Lanka, Cambodia, Vietnam, India, Pakistan, and several other countries also publish their

customs records. These can be accessed through paid subscription services that provide reliable data on every shipment that suppliers (in countries where the data is available) have received from abroad (and in some cases from within the same country). In this way, we can trace the Chinese sub-suppliers of companies operating in those countries that publish customs records, as well as the amount and value of products they're receiving, and often identify the specific fabric content or grade of metal, plastic or chemical etc. that is being shipped. So for instance, we can see that an Indonesian fabric company is sourcing yarn from China, and then see that same Indonesian fabric company shipping fabric to an Indian clothing manufacturer, and then see the shipment of the final piece of apparel from India to the United States. Customs records can facilitate that tracing.

Reviewing customs data has often proven that direct suppliers have been providing inaccurate information regarding sourcing to their customers. It can also allow companies to validate if sufficient untainted raw materials are entering a production facility for their orders. If not, then there is a risk of forced-labor made raw materials.

### **CORPORATE WEBSITES AND DESIGNATED SUPPLIER LISTS**

Do not underestimate the value of a company's official website. Those websites will sometimes name suppliers and customers. Websites may identify suppliers to whom the company has given awards. They may state the regions where the company sources its raw materials. Subsidiaries and parent companies are often named there as well. A thorough search of a company's website should be the first port of call.

Companies sometimes disclose their designated suppliers lists. This is also an obvious aid in tracing supply chains. [Wikirate](#) scours the web for the supplier lists of many corporations and inputs that data into their open source platform.

### **CORPORATE ANNUAL REPORTS**

If a company is publicly listed, it is required to disclose some information about its suppliers (Chinese for suppliers: 供应商). Annual reports often name a company's top five suppliers and the proportion of their sourcing that comes from that supplier. Companies may list the suppliers merely as "Supplier 1," "Supplier 2," etc. If the suppliers are not named, it is useful to search annual reports

from previous years because many companies only recently stopped publishing these names (perhaps with the express purpose of obscuring their sourcing or customers). If a suspect supplier or region turns up on previous years' annual report, it warrants further scrutiny.

### **GENERAL WEB RESEARCH**

Like any other companies, Chinese companies often issue press releases, publicity campaigns, and social media posts or engage with media to produce stories regarding their sourcing agreements or partnerships. Using the Chinese-language name of your supplier, search for the company name and supplier (Ch: 供应商) and sourcing (Ch: 采购) and contract (Ch: 合同). Search also for the Chinese-language name of the company in conjunction with the Chinese name of the material the supplier sources. These searches may turn up critical information about hidden sub-supplier relationships.

## **3. Identify Uyghur Region Exposure**

In addition to the information one can glean regarding Uyghur Region exposure by simply identifying as many sub-suppliers, parent companies, and subsidiaries as possible, information about a company's engagement in the region should be gained through a further bit of desk-based research.

### **PUBLIC DATASETS**

Several organizations have created datasets of companies that have been named in reports and media as participating in Chinese forced labor programs. Your company should be comparing every single direct supplier and sub-supplier against these lists. Comparing your supplier, sub-supplier, or portfolio lists to these pre-existing datasets will significantly decrease the time it might otherwise take to comb through each report individually.

It is important to note that these lists may not reflect changes in supply chains, and may include companies that have exposure but are not directly involved in the region. Procurers should take care to read the materials carefully to understand precisely what connection the named companies have to the region.

Jewish World Watch has developed a regularly updated database of [all companies that have been named in research or media reports](#) as being connected to labor

transfers or other repressive programs in the Uyghur Region. Use this site to search for the name of any supplier.

Think tank C4ADS produced a list of more than 1650 [companies operating subsidiaries in the Uyghur Region](#). These companies should be flagged as high risk because they are likely to be sourcing or exporting products from their own subsidiaries in the region. Companies that are willing to operate in the Uyghur Region are already likely to have made compromises that are not aligned with ethical corporate behavior.

C4ADS's list of companies that are 50% or more owned by the [Xinjiang Production and Construction Corps \(XPCC\)](#) is a useful tool for identifying potential exposure to this state-run paramilitary corporate conglomerate, which is responsible for internment camps, forced labor, and the repressive state apparatus in the region. Not all of the XPCC's subsidiaries are located in the Uyghur Region, and so this may reveal hidden connections. The majority of these companies' names are exclusively in Chinese, so knowing suppliers' Chinese names is critical. See the [Sheffield Hallam report on the XPCC](#) to understand the extent to which it is involved in human rights abuses.

## GENERAL WEB RESEARCH

For many companies in China, advertising commitment to sourcing from the Uyghur Region or accepting state-sponsored forced laborers is a matter of pride and patriotism, and thus these declarations can often be found with a simple search.

The very most basic due diligence research any company should do is to identify whether their known suppliers and sub-suppliers have any connections to the Uyghur Region. Search the web for the Chinese name of your supplier or sub-supplier in conjunction with the Chinese word for "Xinjiang": 新疆. A more thorough search would also include specific Uyghur Region city names and the phrase "bingtuan" which stands for the Xinjiang Production and Construction Corps (the Chinese terms for these are included here). This may turn up sourcing agreements or commitments, subsidiaries, collaborations, engagement in poverty alleviation programs, or even acceptance of forced laborers from the Uyghur Region.

Note that even companies outside of the Uyghur Region have accepted state-sponsored Uyghur laborers who were transferred to factories across China. If a search for a supplier's name and the word "Xinjiang" turns up

news since 2016 of transferred laborers from the Uyghur Region, this is a sign that the supplier is a high risk for forced labor.

Do not limit your searches to the last year alone. There is no reason – short of full public admission of a change in policy or ownership and the receipts to back it up – to believe that a company that was sourcing from, maintaining subsidiaries or factories in, or accepting labor transfers from the Uyghur Region any time since 2016 is no longer doing so. Many companies have simply stopped reporting on their involvement in the Uyghur Region for fear of international backlash.

**Do not limit your searches to the last year alone. There is no reason – short of full public admission of a change in policy or ownership and the receipts to back it up—to believe that a company that was sourcing from, maintaining subsidiaries or factories in, or accepting labor transfers from the Uyghur Region any time since 2016 is no longer doing so. Many companies have simply stopped reporting on their involvement in the Uyghur Region for fear of international backlash.**

## RELEVANT SEARCH TERMS

ENGLISH	CHINESE
company	公司
supplier	供应商
sourcing	采购
contract	合同
Xinjiang	新疆
Urumqi	乌鲁木齐
Hotan	和田
Kashgar	喀什
Aksu	阿克苏
Xinjiang Production and Construction Corps	新疆生产建设兵团
"bingtuan"	兵团
labor transfer	劳动力转移

## 4. Archive Everything!

Archiving internet pages is one of the most important methods for preserving evidence that the Chinese government and corporations would prefer to hide. It is a well-known fact that the Chinese government engages in an incredible amount of internet censorship. In fact, [in a statement from 2019](#), the Cyberspace Administration of China bragged that they had deleted more than 7 million pieces of online information. These deleted “pieces of online information” are incredibly diverse, and range from comments deemed “inappropriate” to posts that do not align with the Chinese government’s political agenda to pages that Western human rights researchers are using in cases against the government. Because of this trend, webpages visited frequently by Western IP addresses tend to be taken down.

Deletion of any information about suppliers is a risk because it limits your ability to learn about their practices and the evidence you have available to address the problem. It also limits the ability for you or others to replicate a search or locate information at a later date.

**Archiving Chinese websites visited as part of the research process should be incorporated into your due diligence policy.** It is critical for record keeping and reporting back to suppliers regarding information collected about them. It could also be useful if there is a contractual dispute regarding supplier codes of conduct or other sourcing agreements. A PDF or image of a website will not be sufficient for proving that a website once existed.

This is why we are pleading with all those who research Chinese corporate information that **every time you land on a Chinese language website that you archive it through one of the free, online archive sites**, such as

the [Internet Archive](#) or [Archive.today](#). We have created a worksheet that [provides step-by-step instructions](#) on how to ensure that sources are archived for future use.

Once you have archived your webpages, it no longer matters whether or not the Chinese government deletes the page: the archived webpage will remain available to you and anyone else who needs it. It is a way to counter the extraordinary internet censorship that the Chinese government and corporations engage in.

Noting the need to archive pages may incentivize further deletion of key information by companies. Companies that are seeking to do due diligence and are unable to find information that may have once been readily available, should understand this opacity as an indicator of risk.

## Conclusion

Corporate due diligence requires attention to forced labor risk in supply chains. While the process of tracing supply chains may be challenging, it is not impossible. Most companies are not currently including even the simplest of desk-based research strategies in their procurement, contracting, or due diligence processes. The steps outlined here will help companies and other researchers begin to gauge their supply chain exposure to the Uyghur Region.

### Other Useful Resources in This Series

Sheffield Hallam University’s Helena Kennedy Centre for International Justice has produced a series of evidence briefs designed to assist stakeholders in addressing Uyghur forced labor. Briefs in this series cover the context of forced labor in the region, products made with Uyghur forced labor, common concerns about addressing the issue, and various guidance for businesses, journalists, governments, affected community members, advocates, consumers, and others seeking to address the issue. Readers who want to learn more should [visit our website](#).