

# ANNEX D

## Corporate Responses

The research presented in "Laundering Cotton" was drawn from publicly available sources or bills of lading available by subscription, which allowed the researchers to identify **risk** in cotton supply chains. All of the companies outside of China that are named in the report are downstream of companies that have sourced Xinjiang cotton, which increases the downstream companies' risk of exposure to forced labor.

All companies named in "Laundering Cotton" were emailed to provide the the opportunity to respond to report findings. (Some emails bounced back and multiple additional email addresses were attempted.) The research team welcomes responses to queries, as it provides additional information regarding sourcing that cannot otherwise be collected through public record. The research team invited companies to indicate any relationship they have to the named Chinese suppliers and intermediary manufacturers, and to describe efforts they have made to exclude Xinjiang cotton from supply chains. The research team cannot independently verify these claims, but we allowed companies an opportunity to address the risk identified in the report.

The responses received suggest that companies have taken a wide range of approaches to the problem of forced labor in the Uyghur Region. Some have implemented more robust supply chain tracing and transparency protocols. Some have indicated that they have designated non-Xinjiangcotton fabrics and supply chains that ensure that their relationship to companies still sourcing from Xinjiang nonetheless do not use Xinjiang cotton in their product lines. Others have engaged auditors or testing programs to assist them in identifying Xinjiang cotton in their supply chains. It is not in the purview of this report to assess those efforts, but they are presented here, in full, to provide insight into how companies are responding to the risks presented by Uyghur forced labor in cotton supply chains. While companies may have implemented protocols to exclude Xinjiang cotton, evidence available in the public domain nonetheless reveals that these companies' suppliers or sub-suppliers have nonetheless recently been sourcing from Xinjiang. This report is designed to provide companies, consumers, governments, and advocates better understanding of where there may still be gaps in our understanding of how Xinjiang cotton can be obscured in international supply chains.

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

Last Updated: June 7, 2022 5pm UK

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- Fast Retailing (Uniqlo, Theory)
- Tesco
- Everlane

## Chinese Suppliers

### Jiangsu Lianfa Textile

November 11, 2021

Hi Laura,

Thanks for your email, our raw material such as farmer cotton & cotton yarn for exporting business is mainly imported from oversea, such as US,India,Brazil,Vietnam etc.

Jensen Xu  
Lianfa Textile  
Tel:86-513-88905172

### Texhong Textile Group

November 15, 2021

Dear Professor Laura T. Murphy,

Thank you for your email. Please kindly find below our responses to the questions raised in your email.

Firstly, we do not and are not required to participate in state-sponsored labor transfer programs of any sort in China. Across the entire Texhong Group (including the recently disposed plant in Xinjiang), we recruit and train employees independently without interference from other parties. Recruitment is purely based on individual merit and past experience or skill set, regardless of race, gender, age or creed. No forced labor or discrimination would be tolerated or allowed in our group.

We wish to add that Texhong Group does not operate any cotton sales business, and has never sold any Xinjiang cotton to the international markets.

Texhong Group has large-scale overseas production bases in Southeast Asia, Eastern Europe, and Central and South America. To the best of our knowledge and according to our international cotton suppliers, Texhong Group – as a global yarn spinning group, is the largest consumer of international cotton in the industry.

Please note that over the past few years the majority of cotton used by Texhong Group are sourced overseas given the fact that our overseas production bases mainly produce cotton-based yarn products, whereas our domestic production bases in China have a significant proportion of production capacity reserved for producing synthetic fiber yarns. Following the recent disposal of our plant in Xinjiang, almost all of our cotton used within China will either be sourced from within the country (excluding Xinjiang), or from overseas. In future, if necessary, our Group can only use cotton produced in other parts of China excluding Xinjiang and from overseas. All of the above practices have enabled us to, over the past few years, operate our business with maximum flexibility and in the best interest of our global customers in terms of preference or choice of cotton source. We wish to further emphasize that Texhong Group follows our customers' requirements in terms of cotton use.

We hope the above information provided to you is useful, and are happy to answer any additional questions you may have. We would greatly appreciate it if you would share your report with us prior to its issuance so that we can contribute to the accuracy of its findings.

Yours sincerely,  
Charles Hui

Company Secretary  
Texhong Textile Group Limited

December 22, 2021

Response of the Texhong Group to the Laundering Cotton Report In November 2021, Sheffield Hallem University in the United Kingdom released a report entitled, “Laundering Cotton: How Xinjiang Cotton Is Obscured in International Supply Chains” (hereinafter referred to as the “Report”).<sup>1</sup> As the title suggests, the Report attempts to illustrate the means by which cotton produced in the Xinjiang Uyghur Autonomous Region (XUAR) of China allegedly finds its way into the international market and ultimately to consumers despite policies and orders in the consuming countries, most notably the United States, prohibiting the importation of cotton products originating in XUAR on the grounds that such products presumably were made with forced labor.<sup>2</sup>

The Report utilizes “case studies” of five major Chinese textile companies based on information from media reports and shipping records to illustrate how these companies allegedly “obscure” the origin of XUAR cotton, implying that the companies are engaged in a deliberate scheme to evade policies prohibiting the importation of XUAR cotton products. One of the Report’s case studies is of the Texhong Textile Group (“Texhong”). Texhong vehemently and categorically denies the Report’s insinuation that it is in any way involved in “laundering” XUAR cotton products. Texhong submits this statement to set the record straight. <sup>3</sup>

#### Introduction to Texhong

Texhong is one of the world’s largest producers of cotton yarn, cotton/man-made fiber (MMF) yarn, and fabric made from such yarns. Nearly 80% of Texhong’s operations involve spinning cotton yarn or cotton/MMF yarn. Texhong and its subsidiaries and affiliates own and operate textile plants in Vietnam, Turkey, Mexico and Central America, as well as in China. More than 70% of the cotton utilized in these operations comes from the international market, not from China. Indeed, almost 60% of the cotton used by Texhong and its affiliates comes from the United States. Texhong and its affiliates together are the largest consumer of U.S. cotton in the world, purchasing 10% of total U.S. cotton production.<sup>4</sup> The Report nowhere mentions the fact that Texhong is so heavily reliant upon international cotton and U.S. cotton in particular.

#### Texhong Has Never Been Involved in Forced Labor

We wish to reiterate and clarify the incorrect assertion in the Report in relation to Texhong’s factory in XUAR, Tianmian, participated in forced labor programs. Neither Tianmian nor Texhong has utilized and never will utilize forced labor in any of its operations. Texhong recruits and trains employees independently without interference from other parties. Recruitment is purely based on individual merit and past experience or skill set, regardless of race, gender, age or creed. Moreover, Texhong has never knowingly sourced cotton from others that was produced with forced labor.

Texhong has no need to utilize forced labor. On the contrary, its operations are highly mechanized and largely automated. Its employees are mostly highly-trained technicians who operate and maintain automated spinning and weaving machinery. Months of training are

required to produce a technically competent employee. There simply is no need for large numbers of low-skill manual laborers in Texhong's operations.

The Report asserts that Texhong has purchased cotton from the Xinjiang Production and Construction Corporation (XPCC), which has been identified as being involved in forced labor in the production of cotton in XUAR. On July 31, 2020, the U.S. Treasury Department's Office of Foreign Assets (OFAC) added XPCC to its Specially Designated Nationals (SDN) list. On November 30, 2020, U.S. Customs and Border Protection issued a WRO, banning the importation of cotton and cotton products from XPCC.

Texhong's customers, especially those exporting to the United States, informed Texhong that XPCC had been added to the SDN list in 2020, and instructed Texhong to cease providing cotton sourced from XPCC in orders supplied to them. Texhong immediately reviewed its operations, undertook due diligence and ensured it had no business dealings with XPCC. In fact, Texhong already had terminated all dealings with XPCC by mid-2019.

#### Texhong Has Divested Its Only XUAR Factory

In 2016, Texhong invested in the development of a cotton spinning plant in northern XUAR to be closer to the main cotton-growing region. The factory in XUAR was called Tianmian. As concern increased during 2020-21 over cotton products from XUAR, Texhong decided to divest its Tianmian factory. Texhong signed a contract to sell the Tianmian factory on September 27, 2021, to an unaffiliated company. The sale closed on November 5, 2021. Texhong no longer has any production in XUAR.

Prior to the sale of the Tianmian factory, the vast majority of the cotton used in that plant was sourced in northern Xinjiang, which is where the Tianmian factory is located. According to the Report, cotton production in northern Xinjiang is highly mechanized and does not involve forced labor. The small amount of cotton used in Tianmian that originated in southern Xinjiang was sourced from private companies without forced labor issues.

But even before the sale of the Tianmian factory, the vast majority of the yarn produced by Tianmian was sold to companies in China. Even more importantly, Texhong has always strictly abided by the sourcing instructions of its customers. Apparel companies sourcing yarn or fabric from Texhong to be made into garments for export to the United States have specified that no cotton produced in XUAR be included. Texhong has scrupulously followed such instructions.

#### Texhong Does Not Supply Products Made with Chinese Cotton to Winnitex

The Report's case study of Texhong is based on a false premise: i.e., that Texhong uses its "subsidiary" Winnitex to launder XUAR-origin cotton products to the international market. This unsubstantiated assumption is wrong on all counts.<sup>5</sup>

Winnitex has always been independently managed and operated. Winnitex's operations are not controlled by Texhong. In particular, Winnitex makes its own independent sourcing decisions. Texhong is advised by Winnitex that all the cotton it uses is from the international market, including the United States, in particular.

In short, the Report's insinuation that Texhong uses Winnitex to camouflage the origin of XUAR cotton sold into the international market is categorically false.

### Conclusions

Texhong has used its best efforts to comply with both its customers' specifications and with U.S. Government policies concerning forced labor. As concern has grown over the risk that cotton from XUAR may be produced with forced labor, Texhong has (1) conducted due diligence to ensure no contacts with entities alleged to be engaged in forced labor, (2) divested its only plant located in XUAR, and (3) increased its use of international cotton, especially U.S. cotton, further solidifying its position as the largest consumer of U.S. cotton in the world. Having taken these steps to ensure full compliance with its customers' specifications and U.S. Government policies, Texhong categorically denies that it is engaged in "laundering" XUAR cotton.

For more information, please contact: Paul Ryberg, Esq. Ryberg and Smith, LLC 1701 Pennsylvania Avenue, N.W. Washington, D.C. 20006 paulryberg@aol.com 301-996-1094

### Notes

1 The Report is available online at: <https://www.shu.ac.uk/helena-kennedy-centre-internationaljustice/research-and-projects/all-projects/laundered-cotton>.

2 On January 13, 2021, U.S. Customs and Border Protection issued a Withhold Release Order (WRO), banning the importation of all cotton products from XUAR and downstream products made with XUAR cotton.

3 Texhong can provide documentation to substantiate all its assertions made in this statement.

4 Texhong is a member of the U.S. Cotton Trust Protocol initiated by the U.S. National Cotton Council and the Cotton Council International. Texhong also holds a Cotton USA license from the Cotton Council International.

5 Winnitex is a joint venture between Texhong and a predecessor company also known as Winnitex. Winnitex specializes in dyed woven fabrics and operates factories in Vietnam, Nicaragua and China. Winnitex sells the fabric it produces to clothing manufacturers, which produce garments that are exported to various markets, including in particular the United States.

February 26, 2022

Dear Professional Murphy,

Thank you for your reply. Apologies for the delay in reply as we were in holidays in early February and it takes time to gather certain information for furnishing our reply. Please kindly see the attached response.

With kind regards,

Charles

1 / 2

Laura T. Murphy  
Professor of Human Rights and Contemporary Slavery

Helena Kennedy Centre for International Justice  
Sheffield Hallam University

Dear Professor Murphy,

We are writing to thank you for the opportunity to share Texhong's perspective regarding cotton sourcing. Our company is committed to strengthening our supply chain and appreciate your efforts to bring transparency and accountability to the industry.

While we are pleased that you have posted our response to the recent cotton report, there are still several areas where we feel our policies and procedures are not accurately represented. Further, we are working to drive industry-wide solutions which we mutually agree is important in protecting and respecting human rights.

You can rest assured that Texhong is deeply committed to producing quality products in a responsible manner and in compliance with the laws of the country of manufacture as well as the country of importation. We are sure that you also understand the complexities of the industry as well as the need for our organization to consider additional investment in our supply chain in order to ensure control and accountability throughout the production cycle.

With respect to investment, Texhong is building out a visual tracking system focused on the sourcing of fiber raw materials based on our current SAP ERP system, in order to more accurately document the source of our cotton products for our customers and stakeholders. It is our intention that this system will be a best-in-class model for the industry with a focus on full supply chain visibility and accountability.

Additionally, we have hired an independent law firm in the United States to fully audit our supply chain to ensure we have policies, procedures and enforcement mechanisms in place to help prevent any forced labor in our supply chain, or to detect and if identified, address, correct and remove any illegal activity. With respect to divestment, it is critical to note that the sale of our Tianmian factory was announced before the Laundering Cotton report was released. To date, we can fully confirm the divestiture of this factory. Documents verifying this change are publicly available.

As stated before, according to our internal verification, there has been no record of buying cotton from XPCC or any transactions with XPCC since 2020. To further confirm this important matter, we engaged an independent third party to conduct an external review of our trading records.

Another important area we would ask your consideration of is our company's relationship with our subsidiary Winnitex and its role in the sourcing of global cotton. As stated before, Winnitex sources all of its cotton from the international market, the majority of which comes from the United States. Specifically, Winnitex sources no cotton from China and accordingly, we welcome you to review the attached statistics showing the sources of the cotton used by Winnitex. (Annex I).

It is important to note that Texhong and its subsidiaries are collectively the world's largest purchasers of U.S.-origin cotton. In fact, Texhong's U.S. cotton purchases in 2021 amounted to 314,186 metric tons, representing approximately 9% of total U.S. cotton exports. Annex II is a statistical table of Texong's U.S. cotton and other international cotton purchases from 2016 to 2021 compared with the total export volume of U.S. cotton. Our investment in American cotton production will continue and grow in the future.

In sum, we deeply appreciate your commitment to ensure global supply chains are transparent and accountable and in particular that they respect human rights and dignity. Our company is committed to

that same objective and has also strictly prohibited forced labor from occurring in our organization. Meanwhile, we are working with our industry partners to ensure the issues addressed in your report will not happen in our supply chain. We share a common goal to eradicate forced labor from our supply chain. We want to identify the problems, address, them and resolve them. We do not want to abandon workers in their time of need, but rather support them in removing the forced labor concerns wherever we can. We would humbly ask that you revisit your report and incorporate these activities into an updated version that more accurately includes these timely and relevant actions.

As we continue to work with the industry to address and eradicate forced labor in our supply chain we expect updated and improved programs. Thank you again for your consideration of our comments.

Sincerely,  
Charles Hui  
Company Secretary

Annex II  
Texhong's purchase quantity of international cotton by year and countries from 2016~2021

Year\Country	Texhong's annual cotton purchase quantity by countries (tons)			US cotton exportation	
	USA	Other countries (Note 1)	Total	Annual quantity (tons)	% of Texhong's Purchase
2016	357,406	56,076	413,482	1,992,608	17.94%
2017	310,544	103,035	413,579	3,247,431	9.56%
2018	356,845	99,936	456,781	3,544,374	10.07%
2019	342,664	66,947	409,611	3,229,144	10.61%
2020	388,557	92,710	481,267	3,376,962	11.51%
2021	314,186	230,104	544,290	3,563,967	8.82%
Total	2,070,202	648,808	2,719,010	18,954,486	10.92%

Note 1.: Other countries include Brazil, Australia, Agentia, India, etc., except for US and China.

Note 2.: The reason for decline of the US cotton purchase quantity in 2021 is that US cotton vendor did not have enough containers to ship out Texhong's total purchase quantity of US cotton.

#### Annex I: Winnitex Cotton Consumption

Cotton Consumption of Winnitex's self-spun yarn (Unit: tons)

Country\Year	2020		2021	
United States	1,081	32.5%	1,983	30.5%
Brazil	1,020	30.7%	1,921	29.5%
Australia	815	24.5%	1,449	22.3%
Mexico	387	11.6%	931	14.3%
Turkey	22	0.7%	139	2.1%
India	-	0.0%	84	1.3%
China	-	0.0%	-	0.0%
Total	3,325	100%	6,507	100%

[Note: Texhong provided an additional unofficial, redacted notice of the transfer of the Xinjiang property, which we have not replicated here. However, our research team has researched both the transaction history and the claims regarding Winnitex sourcing and cannot find public evidence to support or deny either of those claims.]

## Intermediary Manufacturers

### Brandix

November 16, 2021

Hi Laura,

Once again, thank you for reaching out. We understand and value the importance of transparent supply chains and operate on this basis. Please see our responses to your queries.

#### **Can you tell us whether you are indeed a customer of one of these companies or their subsidiaries or if one of your suppliers is?**

We have not had any transactions with Huafu Fashion & Weiqiao Textiles for a long period of time. These two mills were deactivated from our ERP system in July 2019, well before the XPCC related sanctions came into effect, and no transactions have been made since.

Following us becoming aware of forced labour related concerns pertaining to the Xinjiang province and XPCC related sanctions coming into force, we carried out a review of our supplier base and deactivated several fabric mills. Jiangsu Lianfa Textiles & Luthai Textiles too were deactivated as part of this exercise. We have not purchased from Luthai Textiles for the last 18 months and have only purchased a very small quantity of fabric from Jiangsu Lianfa Textiles during the last quarter of 2020 for non-commercial sampling purposes.

Texhong Textiles, although not a strategic supplier, continues to be active and from whom we procure small quantities of fabric for one of our European customers. However, all our suppliers are required to sign our Vendor Code of Ethics (VCE) which amongst many other things prohibits the use of forced labour. Following the passing of the Uyghur Human Rights Policy Act, an amendment was made to our VCE with the following two new clauses:

- One which explicitly prohibits the use of labour as well as the conduct and support of human rights abuse under the Uyghur Human Rights Policy Act 2020
- Another which prevents suppliers, their vendor partners, and all other participants in the supply chain from any involvement with XPCC and its affiliates

Texhong Textiles has signed off on the above amendments and has provided an XPCC sanction declaration. Please note our dealings are with Texhong Vietnam, and our VCE and the XPCC sanction declaration submitted by Texhong Textiles are attached for your perusal.

Brandix policy requests all our suppliers to sign off on the above mentioned amendments to the VCE and submit an XPCC sanction declaration. We have deactivated suppliers who failed to comply.

#### **Can you tell us what, if anything, your company has done:**

**a). to respond to allegations of forced labour in the Xinjiang Region -** As mentioned above, we have carried out a comprehensive review of our supplier base and deactivated suppliers who were suspected to have connections to XPCC and Xinjiang region. We also introduced amendments to our VCE as described above and obtain an XPCC sanction declaration from our suppliers. We have also commenced an ongoing program to 'regionalize' our supply base (moving purchases out of China to other suppliers in India, Pakistan, and Sri Lanka).

**b). to comply with the US, Withhold Release Order on Xinjiang cotton and cotton products -** Most of the mills we procure fabric from are nominated by our customers. We work closely with our customers to comply with their requirements relating to XPCC and traceability.

**c). and/or, to identify the precise source of your cotton/cotton products?**

We are presently testing two approaches:

1. Document tracing across the value chain
2. DNA testing

**We recognize that some companies are working to extract their supply chains from the Uyghur Region. We welcome any updates on how your supply chains may have shifted in the last year or any efforts you have made to ensure that your suppliers do not source Xinjiang cotton.**

As mentioned above, we have taken steps to ensure we do not source Xinjiang cotton and have commenced a program to move away from China to regional suppliers using Indian cotton/yarn. Over the last 4 years, we have drastically reduced our fabric buying from China, and today only 11% of our total fabric consumption is sourced from China. All fabric purchased from China is by customer nominated suppliers or with prior customer consent.

We are happy to answer any further questions you may have and have an ongoing dialogue with you and Sheffield Hallam University.

Thank you.

Warm Regards,  
Imanthi



Imanthi Perera  
General Manager - Corporate Communications  
Brandix Apparel Limited  
No: 25, Rheinland Place,  
Colombo 03, Sri Lanka.

November 19, 2021

following a request to discuss specific relationship to suppliers named in the report Hi Laura,

In response to your query, we recognise two of the suppliers, i.e. Teejay and Hayleys, who are both signatories to our XPCC sanction declaration and Vendor Code of Ethics as explained earlier. Both suppliers are of Sri Lankan origin and have longstanding strategic relationships with Brandix. We have reached out to them for confirmation pertaining to Huafu and Weiqiao and they have reassured us that they do not have any links to sourcing from Xinjian origin. We have requested both for a formal written confirmation and will be able to share this with you by Monday, 22nd November.

Further, we relooked at our records for the past 3 years. The largest suppliers for our Indian operation are Teejay Group, followed by Ocean Lanka. Together, they account for half our buy. We have had no dealings with New Lanka Trading. However, since the research article under Annex C (Supply Chain Tracing), states: "New Lanka Trading (see above) has provided almost 50% of cotton fabric shipments received by Brandix Apparel's production location in India", we would really appreciate further information from your records regarding this supplier. This will help us refine our search and respond more specifically to your query.

Hoping to hear from you.  
Warm Regards,

Imanthi

After we wrote to indicate that Ocean Lanka and New Lanka appear to be the same, we received this response. November 23, 2021

Dear Laura,

Thank you for sharing below information. We did however want to clarify that Ocean Lanka and New Lanka do not share the same address; Ocean Lanka is in Block B and not Block A as cited in the records shared in your email. We also checked in with Ocean Lanka and verified through the Board of Investment (BOI) that there is no registered supplier called New Lanka Trading within the BOI Biyagama Export Processing Zone. Ocean Lanka further certified that it has no dealings with either Huafu or Weiqiao.

We have also heard back from both Teejay and Hayleys and would like to state the following:

**Teejay** shifted away from Chinese origin yarn from September 2020 onwards. Currently, a large majority of their yarn is of non-Chinese origin. Through document tracing, Teejay has assured us that the Brandix business is not exposed to any Chinese yarn and confirmed that there is no purchase history from Weiqiao as well.

**Hayleys'** last purchase from Huafu Macau was in May 2020 for a sample quantity (for a European Customer). They certified that there are no purchases from Huafu thereafter and that Brandix is not exposed to this source. Hayleys too confirmed that there is no purchase history from Weiqiao.

I hope this provides the necessary clarity. We also hope that you will ensure that the report reflects the clarifications made to avoid any misrepresentation of facts regarding our involvement as an intermediary apparel manufacturer sourcing cotton from the Xinjiang Region.

We genuinely appreciate your efforts to ensure transparency and accountability across the apparel manufacturing process and assure you that our operations are always conducted responsibly.

Thank you for reaching out to us once again.

Warm Regards,  
Imanthi



Imanthi Perera  
General Manager - Corporate Communications  
Brandix Apparel Limited

We have included our response to this email because it provides substantive information relevant to Brandix's claims. from Laura Murphy to Imanthi Perera

November 28, 2021  
Dear Imanthi,

Thank you for your email. I have done a little research into your responses and have found that there are some important pieces of information that may be of help.

I understand now that Ocean Lanka is a [joint venture](#) between Brandix, Hirdaramani, and Fountainset. As you probably know through your company's joint venture, [Fountainset's address](#) is in Block A, as is the corporate headquarters for their holdings. That is the likely explanation for why Ocean Lanka's shipping records note Block A instead of Block B. It is unclear to me why the name New Lanka also appears in their records, and it is concerning that they would deny any knowledge of that entity.

Despite their certifications, Ocean Lanka is indeed the consignee of record on constant shipments from both Weiqiao and Huafu over the last several months and years. I have attached spreadsheets of bills of lading that have recorded that information, drawn from the Sri Lanka government's own records. (Please note, records for Sri Lanka usually lag by several months, so our latest information is July or August of 2021, thus we suspect that these connections are ongoing.)

You'll see from the attached that Teejay is still very much sourcing from China, and directly from Huafu, a company that owns a million acres of cotton farms in Xinjiang.

Shipping records indicate that Hayley's most recent shipment directly from Huafu that we can see was actually in February 2021, not in May 2020 as they told you. They also had shipments from Huafu in October and September of 2020. They do receive most of their shipments through an intermediary logistics firm in Macao called Bros Macau, and we have wondered sometimes whether Huafu may be using this firm for logistics. This is unconfirmed, but if I were Brandix, I would want to know what companies' goods are being shipped by Bros Macau.

I hope this is helpful. You may want to look into doing this kind of supply chain tracing within your own offices.

best,  
Laura

January 7, 2022

Dear Professor Murphy,

Thank you for providing us with the shipment details but we were unable to correlate that data to specific transactions for Brandix. Whereas we understand your concerns regarding Huafu and Weiqiao Textiles, we note that the shipping data does not indicate that our suppliers are purchasing cotton or yarn from Xinjiang.

We conducted a thorough review of our business with Hayley's Fabric, Teejay Lanka and Ocean Lanka and we are satisfied that the Brandix business is not exposed to any yarn from Huafu or Weiqiao Textiles.

We have reiterated our concerns regarding the use of yarn from these companies and we will

continue to diligently monitor this situation. Thank you for engaging with us and giving us an opportunity to respond to your report.

Warm regards,  
Mariam

**Eratex Djaja**

November 23, 2021

Dear Professor Murphy,

Thank you for bringing to our attention the potential connection between garment factories manufacturing for various international brands and Chinese fabric suppliers with a history of sourcing Xinjiang cotton.

We recognize that the traceability of cotton within the global fashion supply chain remains a challenge. Establishing traceability to farms of both BCI cotton and conventional cotton is incredibly difficult.

We have carried out a comprehensive review of our supplier base and made SOPS's as below.

- We also introduced amendments to our purchase models and obtain an XPCC sanction declaration from our suppliers.
- We have deactivated suppliers who were suspected to have connections to XPCC and Xinjiang region.
- No purchases are made with mills that are not signing this agreement.
- By Signing this declaration, they are bound to regularize their transactions.

We have also commenced an ongoing program to 'regionalize' our supply base (moving purchases out of China to other suppliers in Indonesia, Korea, Taiwan, India, and Pakistan).

Most of the mills we procure fabric from are nominated by our customers. We work closely with our customers to comply with their requirements relating to XPCC and traceability.

Thank you,

Regards,  
Tunggal

*Head of Compliance Department*

PT. Eratex Djaja TBK. , Jalan Soekarno Hatta No. 23 , Probolinggo – East Java , Indonesia 6721

Phone: +62335 421866

December 7, 2021

[following a request for more information regarding how the company ensures there is no Xinjiang cotton in the fabrics they purchase.]

Dear Laura,

We source fabric from Winnitex, a fabric mill that is mentioned in your report.

In our case the mills are nominated by our Customers & we are obliged to source raw material from them.

Our customers are leading brands who place a high value on human rights & compliance.  
The mills are approved by our Customers after the requisite due diligence.

At our end we ensure that the Mills provide us declarations that they do not use Xinjiang cotton. We do not source materials from any supplier unwilling to provide such a declaration.

Regards

Sriram V S  
Sr. General Manager Marketing / Merchandising  
PT. Eratex Djaja TBK.

**Yunus Textile**

November 23, 2021

Dear Ms. Murphy,

Greetings. I hope things have been well with you.

We regret the delay in response, there was some problem with email due to which your email came to our notice a bit late.

As per the record(s), last year, when the issue of Xinjiang Cotton was highlighted, Yunus Textile Mills Ltd.'s ("Yunus") supply chain was partially dependent on Chinese yarn manufacturers. However, at that time, the decision was made to immediately diversify the supply chain and more regional suppliers were added to reduce dependence on Chinese yarn.

Furthermore, current Chinese suppliers were also contacted to ensure that none of Yunus' cotton had originated in Xinjiang Cotton. Subsequently, Yunus terminated all suppliers that could not validate its request. Moreover, for suppliers we continued working with, a contract clause was added specifying that ***NO Xinjiang cotton would be used and cotton origin certification to be provided.***

It is pertinent to mention most importantly, that in the midst of the Covid pandemic, Yunus took the bold step to invest US\$ 60 million into doubling the internal spinning capacity in order to ensure complete elimination of cotton yarn sourcing from China. This new facility will provide Yunus with full control and traceability of its supply chain. The new facility is expected to start its production from December 2021 and will be fully operational by February 2022, which will result in 80% in-house production while the remaining 20% will be sourced domestically. Accordingly, our relationship with all Chinese yarn suppliers will end up by end of 2021.

At Yunus, we strive to be better every day and we will continue to maintain a fair integrous supply chain.

Best regards,

Rizwan Khan  
DGM – Corporate & Legal Affairs  
Yunus Textile Mills Limited

**Citra Abadi Sejati**

November 29, 2021

[note this is a copy of the letter we received from Eratex Djaja]

Dear Professor Murphy,

Thank you for bringing to our attention the potential connection between garment factories manufacturing for various international brands and Chinese fabric suppliers with a history of sourcing Xinjiang cotton.

We recognize that the traceability of cotton within the global fashion supply chain remains a challenge. Establishing traceability to farm of both BCI cotton and conventional cotton is incredibly difficult.

We have carried out a comprehensive review of our supplier base and made SOPS's as below.

- We also introduced amendments to our purchase models and obtain an XPCC sanction declaration from our suppliers.
- We have deactivated suppliers who were suspected to have connections to XPCC and Xinjiang region.
- No purchases are made with mills who are not signing this agreement.
- By Signing this declaration, they are bound to regularize their transactions.

We have also commenced an ongoing program to 'regionalize' our supply base (moving purchases out of China to other suppliers in Indonesia, Korea, Taiwan, India and Pakistan).

Most of the mills we procure fabric from are nominated by our customers. We work closely with our customers to comply with their requirements relating to XPCC and traceability.

Best Regards,

Gokal Chittaranjan  
(Chief Operating Officer- PT Citra Abadi Sejati)

December 6, 2021

[In response to a request for more information regarding which of the companies named in the report was a supplier and how CAS/Busana Group ensures that goods are not made with Xinjiang or XPCC cotton]  
Dear Laura,

We source fabric from Winnitex, a fabric mill that is mentioned in your report.

In our case the mills are nominated by our Customers & we are obliged to source raw material from them.

Our customers are leading brands who place a high value on human rights & compliance.

The mills are approved by our Customers after the requisite due diligence.

At our end we ensure that the Mills provide us declarations that they do not use Xinjiang cotton. We do not source materials from any supplier unwilling to provide such a declaration.

Warm Regards,

Gokal.

December 7, 2021

Dear Laura,

Another point that we would like to add is that we have not bought any fabric from Winnitex to make products for Hugo Boss.

Regards,

Gokal.

**TAINAN ENTERPRISES**

May 26, 2022

Dear Laura,

Thank you for inspection per final report in Laundering Cotton, regarding our finished garments via Texhong Supplier Chains, through Tainan Enterprises Co Ltd, COO Indonesia, with:

§ PT ANDALAN MANDIRI BUSANA: connecting between 5 brands and Winnitex, traced to Xinjiang Tiamian

§ PT TAINAN ENTERPRISES INDONESIA: connecting between 10 brands and Winnitex, traced to Xinjiang Tiamian.

Please kindly refer to my reply below:

**a) to respond to allegations of forced labour in the Xinjiang Region:**

Randy 26/5:

Given our garment style development stage after fabric adoption, per fabric production test & fabric data sheet approved/ accepted by Brand sourcing office Product Integrity, solely dyeing & spinning method, content, construction, yarn count/ size, weight, stretch & recovery specification are disclosed by fabric mill, (e.g. Winnitex) as Country of Origin, where for its after finish (i.e. water resistant, repellence, coating, lamination), dyeing house (i.e. yarn-dyed, piece-dyed), weaving for staple/ filament, spinners or cotton origin, (e.g. Xinjiang Tiamien) are arduous for Tainan as garment supplier to fathom.

**b) to comply with the US Withhold Release Order on Xinjiang cotton and cotton products, and/or c) to identify the precise source of your cotton/cotton products?**

Randy 26/5:

Starting from current seasonal shipment flow with paralleled in-process control practise:

§ Technical Design & Line Review Stage:

- During fitting, confirm 3<sup>rd</sup> party fabric production test is valid.
- After aligning Fabric Data Sheet's information: Fabric No. (mill article)/ fabric type/ content yarn size/ yarn count/ weight/ dyeing method , sustainability claims, special claims, compliance confirms, testing protocols, stretch specification, with Fabric Package Test as verification, start to inventory FDS, categorised per Brand/ Style/ Composition/ Nominated or Vertical/ Converter/ After Treatment Mill/ Dyeing House/ Weaving or Knitting Factory/ Spinner.
- Per indicated dyeing method, special claim, testing method, stretch spec, identify applicability if tracing back to abovementioned relevant process steps & production units.

#### § Style Review & Pre-Production Meeting Stage:

- After Brand pattern & fit tech approval, verify actual fabrication again via tech pack (Bill of Materials: shell content), care label, construction, measurement chart, along with Garment Package Test (re-check yarn size, count, weight, testing results) against actual pre-production sample (bulk production).
- With approval status as Final, confirm Merchant Style# apart from Master Style#, and input Tainan Cotton Traceability Form as record.

#### § Pre-Final & Final Stage:

- Per sourcing office cut-to-ship record, Tainan checks monthly total style counts as lot size, use AQL2.5 Lv I to review factory Mass Balance Chart to ensure correctness from yardage to pieces.

#### § Ex-factory & ship cancel

- Taipei use AQL2.5 Lv I for style counts as lot size, to sample converters' Sales Contract and its commercial invoice & packing list from weaving / yarn ftys, spinners or cotton origin (if applicable).

#### Result:

※ Once deviation is identified within acceptable number, we will inform merchant team to directly reach out to mill converter for verification and correction.

※ Per above, if out of tolerance (over rejection number), for brand nominated, we will reach out to brand sourcing office for its disposition, and as for vendor sourced, under consideration of on hold from strategic suppliers until correction taken for consecutive times.

※ Throughout upstream production process, if Xinjiang origin or its commingling action is inspected, depending on sourcing channels, inform either sourcing office or vendor mill management team to remove procurement orders, contained shipment and deactivate business relationship effective immediately.

Tainan Enterprises Co Ltd sourced fabric is covered for ponte (nylon, rayon, spandex), i.e. synthetic & cellulose fibres, and faux leather & PU coating. As for natural fibre for twill/ denim yarn-dyed, the cotton origins are from Indonesia/ USA/ Australia/ Brazil (larger yarn size: 7's~10's, short staple).

Sincerely,

Randy Lin

Global Quality & Sustainability,

Tainan Enterprises Co Ltd

## International Brands

### **GUESS**

November 12, 2021

Hi Laura,

Thank you for reaching out and for the opportunity to provide a statement on your upcoming report.

As a global company, GUESS is extremely concerned about human rights issues. This includes, of course, the kinds of forced labor concerns raised by your November 9, 2021 email. As a result of our monitoring, risk management and due diligence processes that are already in place, GUESS has previously terminated our business relationships with vendors in this region as it is always our intent to comply on all matters of trade regulation and customs. We have also made efforts to educate our supply chain employees and partners on the issue as we seek partners that share in our values, and adhere to our supplier code of conduct.

Specifically as it relates to your inquiry regarding cotton processors and downstream supply, our preliminary research has shown that of the 55 manufacturers on your list of concern, we have active business with one: Zodiac Clothing. This vendor represents less than 0.2% of our business, with half of those units made from material other than cotton. In the last two years, we have also ordered a sample size purchase from Thanh Cong Textile Garment, which is on the list, but have zero open purchase orders.

Our list of key strategic vendors is publicly available [here](#); none of which are on your list of concern.

Hopefully this will clarify our relationships with our Vendors and help you to accurately research this issue and the factories in this region.

Is it possible for you to share with us the report prior to publication, or perhaps the section if and where GUESS is referenced? As this would help us to confirm the appropriate public response or statement on the matter. Again, we appreciate your inquiry, and look forward to learning more.

Best Regards,  
Jaclyn Allen

### **Carhartt**

November 15, 2021

Dear Professor Murphy,

Carhartt is committed to conducting business in a fair and ethical manner. Our mission is to serve and protect the hardworking people who make our products. Consistent with this Mission, Carhartt has established a Workplace Code of Conduct as a minimum set of standards for Carhartt suppliers. Carhartt's Code is based on internationally accepted labor standards, including the International Labor Organization's Core Conventions and the Universal Declaration of Human Rights. All factories producing goods for Carhartt are required to comply with the Company's Workplace Code of Conduct, which includes a specific "prohibition of involuntary, prison, or forced labor - indentured, bonded or otherwise" and a methodology to verify compliance with labor standards.

Don Moffett | Director of Social Compliance Carhartt,  
Inc.  
5900 Mercury Drive | Dearborn, MI

**C&A**

November 12, 2021 Hello  
Laura, thank you for your  
request.

C&A does not buy any clothing from manufacturers based in the province of Xinjiang, nor does it have any fabric or yarn factory under contract in this province. We do not tolerate forced labour or unauthorised subcontracting in our supply chain.

This is clearly stated and communicated in our Supplier Code of Conduct and verified through regular audits by our team. All our suppliers must sign and comply with our Code of Conduct as part of our contractual relationships and purchasing agreements.

Regards,  
Betty Kieß

December 3, 2021  
Dear Ms. Murphy

Let me first introduce myself: My name is Michael and I lead the social and environmental supply chain activities at C&A.

I have a question to you:

Would you or one of your researchers be interested in an open and honest dialogue with us comparing your data with our own due diligence measurements especially for the 2 supplier in question in your report?

We are highly interested to learn if our due diligence had gaps in this matter which we are committed to close. C&A does not only state that we do not tolerate forced labour, we are highly committed to walk our talk.

Please let me know if an open exchange would be valuable and feasible for you?

I wish you a lovely weekend

Best regards

Michael

Michael Reidick  
Head of Social and Environmental Stewardship, Global Sustainability Team

**Eileen Fisher**

November 16, 2021  
Dear Professor Murphy,

Thank you for bringing to our attention the potential connection between garment factories manufacturing EILEEN FISHER clothing and Chinese fabric suppliers with a history of sourcing Xinjiang cotton. Consistent with our practices and legal obligations, EILEEN FISHER has engaged in a thorough and

ongoing review of its supply chains to ensure that it does not use cotton from the Xinjiang region of China. Our own records indicate that we have not used materials - cotton or otherwise - from any of the fabric suppliers named in the report.

As a brand that has prioritized organic cotton for almost a full decade, we have the advantage of increased transparency into our cotton supply chain. We rely on recognized and reputable third-party certifications, such as GOTS, to provide information where we aren't able to gather it firsthand. We have also supported and invested resources into developing supply chains that enable us to achieve traceability to the farm level.

EILEEN FISHER typically nominates its material suppliers. When materials are proposed by agents or garment manufacturers themselves, we request full supply chains disclosure during the development stage and ahead of the bulk purchase, in order to verify that the materials meet our criteria.

In addition to these regular practices, we have taken extra measures in response to the Xinjiang cotton risk. These included conducting extensive research on our China fiber supply chain, focusing on supplier hiring practices, and business connections with partners within the Xinjiang Uyghur Autonomous Region. We continue to refresh that research as needed to reduce any risk associated with Xinjiang-sourced product.

We also revised our "Human Trafficking and Modern Slavery" statement (which states that we do not source finished garments, cotton fibers and materials from the Xinjiang region) and communicated it to all of our suppliers and sourcing agents. This includes the suppliers named in the Sheffield Hallam University report.

Our intention going forward is to resend this statement to our suppliers, seek their written commitment to this statement, and continue to conduct focused supply chain research into these issues.

Finally, we wish to point out that EILEEN FISHER is one of several brands that share factories with other brands. Our practices only provide assurance for EILEEN FISHER product. We cannot vouch for the practices or intentions of any other brands that share our factories.

Thank you for allowing us to respond to your call to action. We are happy to answer any questions you may have.

Donna Perri  
Senior Vice President, Supply Chain Management  
Amy Hall  
Social Consciousness Strategic Advisor

**WE Fashion**

November 16, 2021  
Professor Laura Murphy,

We were informed that you have been reaching out to brands to comment on the "Laundering Cotton" report. However, we think this communication to us has been misplaced. We were unaware of any links to the Uyghur Region in our supply chain. Therefore, we would still like to respond to you, with the following statement.

We are writing to express our deep concern regarding the report from Sheffield Hallam University concerning the Uyghur minority being forced to work in the cotton fields and textile factories.

WE Fashion is working with the WE Code of Conduct and the WE Forced Labour Policy, which states that we do not accept any form of forced or bonded labour. We strongly reject any form of forced labour and will cease the relationship with any supplier that works with factories for any of our product that is engaged in these practices.

In addition, WE Fashion is a signatory of the Call To Action On Human Rights Abuses In The Uyghur Region In The Apparel And Textiles Sector. This is an agreement between brands and a coalition of civil society and trade unions, designed to prevent use of forced labour of Uyghur and other Turkic and Muslim-majority peoples. The Call to Action focusses on business relationships of WE with any supplier in China and globally that source inputs produced in the Uyghur Region, such as but not limited to fabric, yarn, or cotton, including production facilities located in the Uyghur Region making apparel and other cotton-based goods.

Please feel free to contact us.

MET VRIENDELIJKE GROET / KIND REGARDS,

SANNE GERRITSE  
SOCIAL COMPLIANCE COORDINATOR

**Marc O'Polo**

November 16, 2021

Dear Ms. Murphy,

Thanks for reaching out to us regarding your research.

The production of our products is governed by the MARC O'POLO Code of Conduct and the implementation of our values. Our Code of Conduct is based on internationally recognised standards such as the ILO Conventions and the UN's Declaration on Human Rights. We monitor the compliance with our Code of Conduct with regular audits.

Moreover:

- We have a policy regarding forced labour and do not accept it in our supply chain.
- We are taking steps to assess the risk of forced labour in our supply chain, and act upon those risks.
- In case forced labour would be detected, we will take immediate action.
- If remediation is not possible, we will eventually decide to stop collaboration with the partner involved in forced labour.

**Can you tell us whether you are indeed a customer of one or more of these companies, and if so, which ones?**

In your list with 55 intermediary manufacturers we found one of our suppliers, which is Aditya Birla. The cotton products we produce with them have nominated fabrics which are not sourced by Aditya Birla. Regarding the five cotton processors/manufacturers: we currently do not source yarns or fabrics from those suppliers.



[Name retracted at the request of the corporate representative]

MARC O'POLO INTERNATIONAL GMBH

November 18, 2021

Follow up in response to query regarding how the company ensures that Aditya Birla does not use Xinjiang cotton in products made for Marc O'Polo, how the company sources the nominated fabrics and ensures that no others are used and from where the company sources those nominated fabrics.

Dear Laura,

thanks for your further questions. All nominated fabrics at Aditya Birla come from Indian fabric suppliers, which source the cotton from India.



[Name retracted at the request of the corporate representative]

MARC O'POLO INTERNATIONAL GMBH

**Adidas**

November 16, 2021

Dear Prof. Murphy,

Thank you for your enquiry.

We do not know the specific details of your research, so we can only comment on the lists that you have shared.

We note that there are three Southeast Asian suppliers on your "intermediaries" list that have produced for adidas either finished goods, or material inputs to finished goods.

- Gokaldas and Shahi are situated in India and produce garments primarily for the domestic market. Our relationship with Shahi came to an end this year.
- Indo Taichen is a materials supplier located in Indonesia.

We can confirm that none of the yarn or fabric used for adidas products in these manufacturing units originate in China and we hold no sourcing relationship with the textile firms listed in your research.

With respect to your questions on supply chain compliance, please see details of our program [here](#).

Kind regards

William

William Anderson  
Vice President,  
Social & Environmental Affairs

December 3, 2021

[In response to a request for more information regarding how Adidas ensures that their products are Xinjiang cotton free]

Dear Professor Murphy

Thank you for your follow-up mail.

We have a nomination process in place for our materials and a materials traceability tool. Suppliers are only permitted to use authorised materials when making our products and none of the yarn manufacturers named in your case studies are a part of our supply chain.

I trust this answers your question.

Kind regards

William

**IKEA**

November 16, 2017

Hej Laura,

Thank you for reaching out with your questions.

Recently, we shared extensively to the UK Parliament Foreign Affairs Committee about our point of view and ways of working related to the questions you raise.

We kindly refer you to the information and explanations in those answers. The material is publicly available and can be found [here](#).

Additionally, we would like to further underline that we at IKEA have a comprehensive due diligence system for cotton, in which we utilize chain of custody traceability and make sure it is segregated throughout the entire supply chain.

Best wishes,

Hannes Mård

Press Officer

IKEA Marketing & Communication AB

**ASOS**

November 16, 2021

ASOS response to “Laundering Cotton: How Xinjiang Cotton is Obscured in International Supply Chains”

ASOS is committed to identifying and preventing the use of forced labour wherever it exists. We are proud to stand against modern slavery. Through our partnerships with IndustriALL Global Union and Anti-Slavery International, formed in 2017, we have been working to eliminate any risk of exposure to the Xinjiang Uyghur Autonomous Region (XUAR) throughout our supply chain.

We signed the Coalition to End Forced Uyghur Labour's Call to Action in November 2020. As part of that commitment, we have taken the following action:

- Immediately contacted our suppliers to inform them of our zero-tolerance position on manufacturing within or sourcing goods or raw materials from the XUAR, and on the use of Government-supplied labour.
- Immediately contacted our brand partners to set out our position on the XUAR and our expectation that our brand partners would also sign up to the Call to Action. Together with Anti-Slavery International, we hosted a workshop with select brand partners in the UK to support them in taking these steps.
- Contacted our suppliers and brand partners with regards to the US Withhold Release Order and asked them to proactively identify and halt any product potentially at risk of violating this Order.
- Conducted a review of all Tier 1 to 3 (manufacturing level) factories. This includes determining indirect links between suppliers and other subsidiaries or parent companies via publicly available information such as company registration links or company financial reports.
- Following this review, disengaged from two Tier 1 factories with links to the XUAR. In early 2021, following the acquisition of Topshop, Topman, Miss Selfridge and HIIT by ASOS, we immediately exited four suppliers to those brands with links to the XUAR.

We recognise that the traceability of cotton within the global fashion supply chain remains a challenge. The majority of our cotton is sourced through the Better Cotton Initiative (BCI), which has ceased all field-level activity within the XUAR. However, establishing traceability to farm of both BCI cotton and conventional cotton is incredibly difficult. To address this, we have been working to require our tier 1-3 suppliers to declare their fabric supplier facilities throughout 2021. This includes fabric mills, fabric converters, markets, fabric stockists and fabric agents. This work is ongoing. As we establish greater visibility of our fabric supply chain, we will be able to take the necessary action to ensure we are removing any risk of sourcing from the XUAR. We have also been working with industry colleagues to encourage the Better Cotton Initiative to develop higher levels of traceability as quickly as possible, with an immediate focus on reduction of risks relating to cotton produced in China.

In September 2021 ASOS announced the next phase of its Fashion with Integrity programme, with four key 2030 goals: Be Net Zero, Be More Circular, Be Transparent, and Be Diverse. Through Be Transparent, ASOS has committed to ensuring 100% of own-brand products will have supply chains mapped to raw material level by 2030, extending our existing supply chain mapping. Within that target we will be prioritising high-risk materials such as cotton.

**Amazon**

November 16, 2021

Hi Laura,

Thank you for your response. Kindly see below Amazon's response:

Amazon complies with the laws and regulations in all jurisdictions in which it operates. Amazon expects all products sold in the Amazon Stores to be manufactured and produced in accordance with our [Supply Chain Standards](#). Whenever we find or receive proof of forced labor, we take action and remove that product and may suspend privileges to sell.

##

Looking forward to reading the report tomorrow.



Anna Bernado | EMEA Sustainability Comms Lead | Amazon

**Hugo Boss**

Dear Professor Murphy,

We are in receipt of your e-mail dated November 10, 2021 and appreciate the opportunity to open a dialog with your organization.

Safeguarding human rights in the complex global supply chains is a top priority for HUGO BOSS. Accordingly, we do not tolerate forced or compulsory labor or any form of modern slavery. We also demand this attitude from all our partners along our supply chain. We have summarized our high ethical standards in more detail in the HUGO BOSS [Supplier Code of Conduct](#), which forms the basis and framework for our business partnerships worldwide. Our values as well as our standards for respecting human rights are also defined in our [HUGO BOSS Human Rights Policy](#) as well as in our [Code of Conduct](#).

It goes without saying that we have taken the public reports and the associated allegations regarding human rights violations in the Xinjiang region very seriously and initiated measures accordingly. So far, HUGO BOSS has not procured any goods originating in the Xinjiang region from direct suppliers. As publicly stated, we have also requested our direct suppliers to inform us and confirm that the production of our goods in our supply chain is carried out in accordance with our values and standards and, in particular, that human rights and fair working conditions are observed along the supply chain. In addition, we have added the request for this confirmation to our already very comprehensive onboarding process for all new suppliers.

As you can see, we have taken the appropriate measures to ensure that our products are manufactured according to our high standards and are not aware of any inconsistencies. Unfortunately, we cannot tell from your email where exactly you detected a reference to HUGO BOSS in your research. We would appreciate the opportunity to investigate your specific findings with respect to our supply chain and would highly appreciate if you could provide us with further details about your research.

Most respectfully,

Your HUGO BOSS Corporate Responsibility Team

**HUGO BOSS**

HUGO BOSS AG  
Dieselstrasse 12, 72555 Metzingen, Germany

**Lacoste**

November 16, 2021  
To: Laura Murphy  
From: Lacoste

Dear Laura Murphy,

Thank you for contacting us on this crucial issue.

First, we would like to make it clear that Lacoste takes the issue of forced labor very seriously and strongly condemns any violation of human rights.

Social, as well as environmental issues, are at the heart of Lacoste's concerns.

To ensure that our supply chain reflects these principles, Lacoste suppliers are required to respect and enforce the Lacoste Partner Ethics Charter (available here:

[https://corporate.Lacoste.com/app/uploads/2020/12/Lacoste\\_Partners\\_Charter\\_of\\_Ethics\\_2019\\_eng-1.pdf](https://corporate.Lacoste.com/app/uploads/2020/12/Lacoste_Partners_Charter_of_Ethics_2019_eng-1.pdf)). This charter defines the minimum standards of ethical and responsible conduct that must be respected by suppliers, in accordance with the brand's corporate culture. This charter is based on the respect of human and labor rights. If this charter is not signed by the potential partner, Lacoste will conduct no business with the entity. This letter is part of our Standard Operating Procedure.

Non-compliance with this charter by any supplier, particularly with regard to forced labor, human trafficking and other forms of modern slavery, would result in the termination of the business relationship.

Lacoste only deals with partners who are able to guarantee that their activities respect the conventions, laws and regulations in force and the principles set out in the charter. In order to control compliance with this charter, Lacoste carries out strict and regular audits on all its subcontractors. If the audit reveals that the Lacoste Partners' Ethics Charter is not respected, the company undertakes to terminate the contract binding it to this supplier.

It is worth noting that only cotton origins from USA, Australia, Turkey and Peru have been authorized from 2020 production. Lacoste has selected these four countries that implement the best practices: cultivation rules are very strict, chemical inputs are regulated and monitored, mechanical collection is used to ensure good social conditions for harvesting the cotton flowers, and optimized water consumption.

Throughout our supply chain, we carry out extensive traceability work, on which we are very transparent. All active factories manufacturing products or components within the Lacoste supply chain (from rank 1 to rank 4) are listed on the company's website (<https://corporate.lacoste.com/forcommunities/>) and have been subject to at least one social compliance audit by an independent third-party audit firm in the last two years. In addition, each factory is challenged by our Quality teams in the implementation of the corrective action plan that may have been issued as a result of the audits.

To re-enforce his traceability controls, Lacoste is working with ORITAIN UK company (Oritain.com). ORITAIN technology is very innovative and certifies, through laboratory testing, the cotton's farming origins. Lacoste has been working with Oritain since begin of 2020, and we include this laboratory testing in our production control plan, on 100% of his supplier using cotton for our products. (You can find a Oritain test report, as an example).

Laboratory Oritain testing program assures Lacoste product content only cotton from authorized countries.

In order to guarantee the most rigorous control of its supply chain and to improve its working conditions in a sustainable way, Lacoste is an active member of the Initiative for Compliance and Sustainable Development (ICS), a French initiative founded by the Federation of Commerce and Distribution (FCD). Within the framework of this initiative, social audits are carried out by external auditors accredited by the ICS, according to a grid and a methodology developed by the stakeholders of this initiative. This methodology guarantees total independence of the audits and aims, through corrective action plans, to improve working conditions in the global supply chains of member retailers and brands.

To go further, we have also set up an alert system. Thus, any stakeholder wishing to alert on actions that would go against one of the principles defined in our Code of Conduct or our Ethical Charter for partners, can do so via the alert system available on our website: <https://Lacoste.signalement.net/entreprises>. The alert is directly transmitted to the Group Compliance Manager, who is subject to a principle of total confidentiality. In the event of an alert, we would have the possibility of triggering specific reinforced audits.

In the same spirit of anticipation and information gathering, we use tools to monitor alerts on specific risks - such as forced labor, human trafficking and other contemporary forms of slavery - so that we can investigate cases that would be identified. For all of our operations in China (as well as globally), we have been working with ELEVATE, an independent auditing organization that is an expert in responsible sourcing, to provide us with very detailed cross-referenced information and reputation tracking.

We hope that these elements and observations will be useful to you in your investigation and remain available.

Best regards,  
Lacoste team

**Marks & Spencer**

November 16, 2021

Dear Professor Murphy,

Apologies for the late email.

Following on from your call with Carmel and Katharine, please find attached our written response to the questions outlined which you can include on your landing page:

- We were one of the first companies to sign up to the Coalition Call to Action in January 2021 and we continue to work closely with the Coalition to help play our part in driving meaningful change at scale.
- Our Cotton Sourcing Policy was updated in December 2020 to include a ban on cotton from the Xinjiang region.
- We have no factories in our supply chain in Xinjiang province.
- We have no evidence of any forced Uyghur workers in our factories and have done due diligence audits and worker interviews to verify this.
- We update our Tier 1 transparency map twice a year - 100% of Tier 1 is publicly disclosed.
- We have fibre Country of Origin declared for all cotton fabrics.
- Since we signed up to the Coalition, we have launched a pilot with Oritain™ to verify cotton origin.
- We will review findings of this report.

I'm also sharing a statement that can be shared on the report's website/landing page.

**An M&S spokesperson said:** "At M&S, sourcing ethically and sustainably is core to how we do business and the promise we make to our customers, that's why we do not source cotton from the Xinjiang region of China.

"In January, we became one of the first companies to formally sign the Call to Action on human rights abuses in Xinjiang and we continue to work collaboratively with the Coalition to strengthen controls in our own supply chain and help drive meaningful change at scale in the region.

“All cotton sourced for M&S products must meet the strict criteria of our Cotton Sourcing Policy and we have robust due diligence processes in place, including a pilot testing programme with Oritain™ to verify the origins of fibres within our supply chain.

“We remain committed to supporting the Coalition and others working in this space to promote the human rights of those in the Uyghur Region.”

If you have any questions, please don't hesitate to get in touch.

Kind regards, Kirstin

**Kirstin Scott** (she, her, hers)  
External Communications Manager - Sustainability

### **Primark**

November 16, 2021

Primark Response to Sheffield Hallam Report 16/11/2021

- Primark stopped sourcing any products from the Xinjiang Uighur Autonomous Region of China (XUAR) in 2019 due to our inability to gain the necessary access to undertake audits in the region. In September 2020 we mandated to all our suppliers (whose factories make products on behalf of Primark) that they cannot produce anything for Primark using any products, materials, components, or labour originating in any way from the Region.
- Over the past year, we have been running an extensive engagement programme with all our suppliers to help reinforce our position on the importance of supply chain transparency including not sourcing from the XUAR. As part of this, we asked for suppliers' acknowledgement and compliance with our position, specifically naming a number of organisations from which they could not source. This included Huaifu Fashion, one of the mills named in the letter you sent to us about your report. • You have told us that our supplier, MAS, has been linked to Huaifu in the course of your work. MAS had previously confirmed to us their compliance with our stated directives concerning sourcing from the XUAR. Upon receipt of your communication we contacted MAS immediately who confirmed to us in writing they do not source any cotton for Primark goods from Huaifu. Nevertheless, we will now work to validate this as part of an investigation which we have started immediately.
- Removing the risk of exposure to the Xinjiang region and improving transparency and traceability in global supply chains is highly complex but we are absolutely committed to working both ourselves, and within the wider industry towards this goal.

### **Kontoor Brands (Lee, Wrangler)**

November 16, 2021

Kontoor Brands condemns the use of forced labor and is firmly committed to preventing the use of forced labor in our global supply chain.

At Kontoor, we do not purchase cotton. We purchase finished garments through our sourcing operations and we purchase fabric to be used in our internal manufacturing.

Our relationship with our suppliers is governed by our [Vendor Terms of Engagement](#) policy and our [Cotton Fiber Sourcing](#) policy – both of which expressly prohibit the use of forced labor. Our [Cotton Fiber Sourcing](#) policy requires third-party suppliers take specific actions to ensure that no forced labor is used in the harvesting or production of cotton used to make products for Kontoor.

As part of these policies, we also require third-party suppliers to provide the origin of the cotton being used in our products. To that end, we have implemented numerous chain-of-custody audits with our suppliers and have found no evidence that cotton harvested with forced labor is being used in our products.

Kontoor is committed to the responsible growing, harvesting and processing of cotton used in our products.

**Lands' End**

November 17, 2021

Dear Mrs. Murphy,

Thank you for reaching out to us regarding your interest in understanding what we have done to respond to the challenges presented by the crisis in the Xinjiang Uyghur Autonomous Region. Lands' End has a long-standing Code of Conduct for our supply chain partners that restricts forced labor, modern slavery, and human trafficking within our supply chain anywhere in the world. Our commitment to identifying and preventing forced labor in our supply chain can also be found in our Modern Slavery Policy which can be found at <https://www.landsend.co.uk/Corporate/co/corporate-governance.html>. Lands' End additionally requires all our suppliers, foreign and domestic, to follow our Global Compliance Program. For more information on this program, please visit our webpage under "Sustainability" tab at the bottom of our homepage. Or simply click here: <https://www.landsend.com/sustainability>.

With respect to the Xinjiang issue, we have followed our policies to identify vendors for disqualification from working with us that do not share this commitment and continue to conduct audits and screen our supply chain for entities like those you have identified in your recent email. Finally, we have taken steps to expand our use of certified cotton sources, including Supima® and Better Cotton Initiative, from countries outside of China.

Lands' End is committed to conducting business with a high standard of business ethics, a regard for human rights, and in compliance with all applicable laws, and expects its vendors to demand similar standards in its entire supply chain including pre-assembly, and core and secondary facilities, whether owned or leased.

Best regards

Constanze Freienstein  
She/her/hers  
EU DIRECTORATE  
Managing Director, Europe

**S. Oliver**

November 18, 2021

Dear Mrs. Murphy,

Dear Sheffield Hallam University's Helena Kennedy Centre for International Justice,

Thank you very much for your mail and for sending the report. Please kindly find our response to your inquiry on the usage of Xinjiang Cotton below.

Like many other fashion companies, the s.Oliver Group develops its products in Germany, but places orders for the production of its articles with suppliers from various international, especially European and Asian, markets.

We are of course aware of the responsibility that arises from this procurement process. Which is why we have for many years promoted human rights due diligence, as well as safe working and production conditions at our suppliers, with an extensive program for the implementation and monitoring of social standards.

The clear prohibition of forced labour is regulated in our [Code of Conduct](#) which is a prerequisite for commencing and/or continuing a business relationship with a supplier. Additionally, we include a detailed policy on the topic of forced labour in our supplier contract (Sustainability Fact Sheets). The observance of our Code of Conduct is enforced through our s.Oliver Group's audit team as well as independent third party auditors. Therefore, we can validate that no manufacturer of ours is situated in Xinjiang.

We are aware of the possibility for linkages to the region in the deeper supply chain and are working together with our suppliers to assure that both no production steps are being made in Xinjiang as well as no cotton is sourced from the region.

Additional to auditing suppliers and manufacturers, we are increasingly sourcing cotton from more sustainable sources to further minimise the risk of sourcing cotton from forced labour. Apart from sourcing cotton under the "Cotton made in Africa" model, we are also a member of the Better Cotton Initiative (BCI) and source cotton under the Organic Content Standard (OCS). In 2020, more than 70% of our cotton came from more sustainable sources. We are working towards reaching 100% in 2022.

In an effort to further reduce the risk, we have shifted our supply chain in the past year and will remain to further do so. In this regard, we have stopped the direct business relationship with Jiangsu Lianfa Textile and our indirect business relationship with Weiqiao Textiles, as they are a subsidiary dyeing mill of a former core fabric supplier, Weiqiao, as well as Winnitex, a subsidiary of Texhong. For our business relationship with the manufacturer Masterindo Jaya Abadi, we purchased one style through the BCI model in the past year.

Having said that, we are taking your research results very seriously and will take this as a starting point for further investigation into our supply chains as well as acting together with our suppliers.

Yours Sincerely,

**Julia Kümmel**

Junior Consultant PR

Corporate Communications / Fashion & Brand PR

#### **ASDA**

Though ASDA was not named in the report, they volunteered to submit a response to the report.

November 18, 2021

Dear Professor Murphy,

Thank you for the opportunity to respond to your detailed investigation and report *Laundering Cotton - How Xinjiang cotton is obscured in international supply chains*, and the associated questions for companies. At Asda, we appreciate this issue being explored and highlighted where a complex and challenging topic for any supply chains.

Following our separation this year from Walmart, Asda has responded to allegations of Forced Labour in the Xinjiang Uyghur Autonomous Region XUAR through:

- Undertaking a review of our first-tier supply chain, which confirms we have no manufacturing facilities in Xinjiang province.
- Requiring all suppliers to comply with our [Standards for Suppliers](#). Our Standards requires suppliers to uphold and champion our Standards throughout their own supply chains, including specific standards to exclude all involuntary labour and to champion Human Rights.
- Publishing our George [1<sup>st</sup>](#) and [2<sup>nd</sup> tier](#) suppliers via our George website.
- Communicating our policy regarding the prohibition of Forced Labour directly with our suppliers, requiring them to undertake specific actions, including checking their own supply chains and communicating with us regarding any products potentially originating from the Xinjiang region to collaboratively work on removing any sourcing from the region.
- A commitment within our latest [Modern Slavery statement](#) to explore the opportunity for improved due diligence for high-risk product sourcing to establish and validate traceability and provenance via scientific forensic testing.

Regards  
Anna Smith  
Senior Manager Responsible Sourcing & Modern Slavery SME  
Legal and Compliance

December 14, 2021  
following a request for more information after HKC researchers identified four companies on George designated supplier list named in report.

Hi Laura,

In terms of explaining Asda connections with any of the suppliers on the list of manufacturers sourcing from China, earlier this year following the Australian Strategic Policy Institutes report (Uyghurs for sale) as a business we took steps to move our sourcing away from three factories.

Following this, Asda has continued with our efforts to commence additional due diligence via the forensic testing of products as part of our Modern Slavery commitment. We hope that the outputs of this testing will better enable us to identify where there may remain issues more precisely, and enable us to engage with our suppliers more directly to determine the most appropriate way to address any concerns identified. Our primary goal will be to work with our direct suppliers in the supply chains, with what is best for workers in mind.

Again, we respond to all allegations of forced labour in the XUAR or otherwise, and in terms of identifying the precise source of our cotton/cotton products our Cotton policy requires that our suppliers have traceability of their cotton production to country of origin and ginner level, and all cotton products must include sustainable cotton from one of the following schemes:

- Better Cotton Initiative (BCI), any cotton sourced as BCI must be tracked via the BCI platform.
- Fairtrade Cotton
- Organic cotton – documentation is required in line with the Global Organic Textile Standard (GOTS) or the Organic Content Standard (OCS)
- Cotton Made in Africa
- Other sustainable cotton schemes will be considered upon request

Hope this helps and I'd be happy to put in a call with you to discuss further if that would be of interest?

Regards

**Anna Smith**

**Senior Manager Responsible Sourcing & Modern Slavery SME**

Legal and Compliance

**Fast Retailing (Uniqlo, Theory)**

November 24, 2021

Dear Professor Murphy,

Thank you for your recent email and interest in Fast Retailing, the parent company of UNIQLO and Theory, both mentioned in your report. We previously published a statement on the situation in Xinjiang, still publicly available at: [www.fastretailing.com/eng/sustainability/news/2008171600.html](http://www.fastretailing.com/eng/sustainability/news/2008171600.html). We would like to re-confirm that Fast Retailing has no partner factories in the Xinjiang region. To help promote transparency in our industry, we publish and maintain a list of the group's garment factories and fabric mills. These are available at: [www.fastretailing.com/eng/sustainability/labor/list.html](http://www.fastretailing.com/eng/sustainability/labor/list.html).

In addition, we are working to ensure an even higher level of traceability, right through to the raw materials stage of our supply chain. This includes plans to further strengthen the objectivity of our processes, through third-party inspections and certification frameworks.

Best regards,

Yukihiro Nitta

Group Executive Officer, Sustainability Fast Retailing Co., Ltd.

[Note: Fast Retailing's designated suppliers list mentioned in the company's response includes numerous companies named in the report. Luthai is listed among the company's core fabric mills.]

**Tesco**

November 24, 2021

Dear Professor Murphy,

Thank you for your email and report.

In line with UK Government guidance, Tesco will not accept any cotton or other goods grown or manufactured in the Xinjiang (China) province.

We have spoken to all suppliers on this issue emphasising the seriousness we place on ensuring these rules are adhered to. Our team of Technical Managers have been monitoring compliance of this for a number of seasons. We welcome any further information from your research which suggests our policy is not being followed, and we would of course investigate thoroughly where appropriate.

We work with a number of sustainable cotton initiatives which enable us to trace the provenance of the cotton commodity in our goods. Please see further explanation of this below:

- Hirdaramani International- All of the cotton used by Hirdaramani for Tesco clothing is organic or

Better Cotton Initiative (BCI). Both sets of cotton have [Global Organic Textile Standard \(GOTS\)](#) certificates or [Better Cotton Claim Unit \(BCCU\)](#) tracker IDs for our orders, helping us monitor traceability compliance.

- Intermediary Manufacturers- We work with a significant number of sustainable cotton initiatives including, [Better Cotton Initiative](#), [Global Organic Textile Standard](#), [Global Recycled Standard](#), [Good Earth Cotton](#) and [US Cotton Trust Protocol](#), to help ensure our cotton is traceable.

Further information on our approach:

We've published a list of our clothing suppliers which can be found [here](#).

In 2017, we signed the "Sustainable Cotton Communique", recently renamed the [2025 Sustainable Cotton Challenge](#), to source 100% more sustainable cotton by 2025. You can find out more about our cotton strategy and goals on our [website](#).

Kind regards,

Johanna Wilson  
Responsible Sourcing Standards and Audit Manager  
PRC/ Responsible Sourcing

December 7, 2021

Dear Professor Murphy,

Thank you for your email. I would like to clarify the correct 2021 supplier list can be found [here](#). Tesco no longer trades with any suppliers named "Luthai/ Luthai", but thank you for the insight shared.

Our teams will continue to work closely with the five sustainable cotton initiatives in the way I outlined in my previous response, to ensure no Xinjiang cotton finds its way into our business. We are also continuing to work with external partners to ensure we have strong strategy, testing and internal procedures in place.

Kind regards,

Johanna Wilson  
Responsible Sourcing Standards and Audit Manager  
PRC/ Responsible Sourcing

**Everlane**

November 24, 2021

Dear Professor Murphy,

Thank you for reaching out and bringing our attention to your research. At Everlane, we recognize that this matter is one of the most urgent facing our industry, and that swift, transformative action is needed to make meaningful change in our industry and beyond. We are taking this matter seriously and value the

importance of transparency and traceability to ensure human rights are upheld for the people in our value chain.

At this time, our analysis and records indicate that none of our raw materials, yarns, and fabrics produced in the manufacturing units called out in your report (and otherwise) originate from the XUAR.

As a brand that places high value on supply chain transparency, we routinely take measures to understand, trace, and document the suppliers and materials that may enter our supply chain. As it relates to our cotton sourcing, we have engaged in an extensive, ongoing analysis of our supply chain to ensure to the best of our ability that we do not use cotton or labor from the Xinjiang Uyghur Autonomous Region, leveraging our 'No Conflict Materials or Labor Agreement' as well as third-party certifications, such as GOTS, for our organic cotton sources.

First, as a matter of integrity and quality control, Everlane nominates approximately 85% of its fabrics, melange yarns and colors, and material suppliers that we work with. When materials are proposed by our manufacturing partners or agents, we request and collect relevant traceability documentation to help verify that the materials meet our criteria for, among other details, our commitments to human rights and non-conflict cotton.

Additionally, in direct response to the Xinjiang cotton and labor risks, we have taken added measures to try to ensure that our cotton fiber supply chain does not include materials with connections to the XUAR.

- We have revised our 'No Conflict Materials or Labor Agreement,' adding the Xinjiang region to our restricted sourcing list. The 'No Conflict Materials or Labor Agreement' clearly states that we do not source cotton raw materials or finished goods originating from the Xinjiang region (as well as other regions known for human rights violations). Our factory partners, including those named in your report, have executed and agreed to the contents in our 'No Conflict Materials or Labor Agreement.'
- Following the details published in your report, we conducted an additional comprehensive review of our supply chain to reconfirm the origin of our cotton materials sourced from the factories and mills implicated in your report. Our review has shown that, of the listed suppliers of concern mentioned in your report, one (Huafu) has been an upstream yarn supplier in our network — specifically, we have sourced yarns from Huafu's Vietnam division, and have confirmed that the cotton country of origin is outside of China, and attributes to less than 1% of our business. In light of your research, we have made the decision to immediately stop sourcing from Huafu's Vietnam division and have made our suppliers aware of this change.

We recognize that the nature of this work is ongoing, and we are committed to continuing to mitigate the risks associated with XUAR cotton and production in our supply chain. We will continue to conduct ongoing analyses to uphold the standards set forth in our [Vendor Code of Conduct](#) and 'No Conflict Materials or Labor Agreement' (attached) to ensure fair labor practices and human rights are upheld in the sourcing and creation of our product.

We respect the work that you and others are doing to shed light on the complexity of this situation and move the industry forward. We thank you for the opportunity to respond to your research, and would welcome the opportunity to work with you on any future analysis.

Thank you,

Katina

November 29, 2021

[in response to a request for more specific information about how they ensure Hirdaramani does not use Xinjiang cotton for the company's goods.]

Hello Laura,

Thank you for your reply. Of course, I can help to explain our specific situation with Hirdaramani.

We currently source and ship all of our fabrics from Everlane-nominated suppliers (none of which were on your list of concerned suppliers) to Hirdaramani. We tell the factory explicitly which mills to buy from, specific fabrics to source, and quantities to be used in our product — we provide detailed fabric detail sheets that dictate the mill, article number, content, and fabric and yarn country of origin to accomplish this. We are not using Hirdaramani as a fabric sourcing agent and we do not source from Winnitex, nor do we have a relationship with them.

Hirdaramani may be using Winnitex and Ocean Lanka/New Lanka for other brands that source through Hirdaramani, but we are not currently operating in this capacity nor do we have access to that information.

Thanks also for sharing the Call to Action. We will review the commitment and let you know if we have any questions.

In the meantime, please let me know if you have any additional questions. We are very interested in the goals of your research and would be happy to provide context and details if helpful.

Thank you,

Katina