ANNEX C

Supply Chain Tracing

Case Studies of the Effects of Xinjiang Cotton Sourcing in the Downstream Supply Chains of Five Chinese Manufacturers: Luthai Textile Co. Ltd., Jiangsu Lianfa Textile Co. Ltd., Huafu Fashion Co. Ltd., Texhong Textile Group, and Weiqiao Textile Co. Ltd.

Methodology

While brands and consumers are increasingly aware of the implications of sourcing from Chinese enterprises revealed to be connected to Xinjiang's cotton industry,¹ much remains unknown about the presence of Xinjiang cotton in brands' supply chains when the relationship with Chinese cotton enterprises is indirect²—meaning a brand is receiving its finished goods from a supplier outside of China that has a relationship with Chinese cotton enterprises in its supply chain. The purpose of this annex is to trace likely routes Xinjiang cotton takes as it is exported out of China and eventually shipped to apparel brands in the form of finished garments. This annex thus explores supply chains between Chinese companies known to be engaged in or supplied by Xinjiang and widely known apparel brands, via intermediary garment manufacturers. These intermediary manufacturers, located throughout Southeast Asia and elsewhere, receive cotton fabrics and/or yarn from Chinese enterprises and then export finished cotton garments or other cotton products to a multitude of different well-known brands in the United States and Europe.

The first step in researching these relationships was identifying cotton processing factories or textile factories in Xinjiang. Names of factories mentioned in previous research constituted a starting point.³ Key terms relevant to labor in Xinjiang's cotton and textile industry and mentioned in previous research, such as "poverty alleviation," "satellite factory," and "surplus labor," were used (in Chinese) to search for Chinese media articles containing names of factories and further relevant information on their operations. All names of factories or "workshops" encountered in Chinese media were noted. Following this, factory names were matched to mainland Chinese cotton enterprises, identifying parent companies or investors where possible. These companies investing in Xinjiang often do so in the context of "pairing programs" aimed at poverty alleviation; counties in Xinjiang are "paired up" with provinces in mainland China in order to foster investment by mainland Chinese enterprises into their partner county in Xinjiang.⁴ Using names of individual Xinjiang factories to carry out more specific searches, these enterprises investing in Xinjiang's cotton industry and running subsidiaries in the region were identified.

The next step was to gather trade data in Panjiva Market Intelligence's online database to identify any potential links between Xinjiang factories and foreign brands. Panjiva is a subscription-based database that gathers import and export records (bills of lading) on commercial shipments worldwide, primarily obtained from customs agencies. Virtually no exports of cotton products originating from the Xinjiang region have been recorded by countries that disclose their shipping records since early 2018, hence the relevance of identifying parent companies or investors located in mainland China and searching for these names in the database. A list of companies that appeared to have been sourcing Xinjiang cotton and that had accessible shipping records was compiled and their shipments reviewed over a two year period.

Starting from these Chinese suppliers of cotton fabric and/or yarn, supply chains were mapped by looking into each of the companies sourcing from the identified Chinese suppliers and any subsequent supplier tiers, until export records show finished garments being sent to a clothing brand.

The supply chains discussed in this section were selected based on the existence of sufficient online information tying a specific Chinese textile enterprise to Xinjiang cotton, as well as the availability of sufficient trade data for this enterprise in Panjiva. There are undoubtedly many more manufacturers involved in similar supply chains, for which we could not find sufficient information to build a substantial case. When gathering all available data on specific companies, care was taken to include any alternative names referring to the same entity. Since entity names are often modified or misspelled on bills of lading, this leads to import and export data for one and the same entity being "scattered" throughout the database. Nonetheless, the possibility that some relevant shipment records were accidentally overlooked remains. Furthermore, only the shipments originating from Chinese suppliers' mainland production locations and subsidiaries or from their offices in Hong Kong or occasionally Macao were considered. Some of the selected enterprises also run production locations abroad, notably in Vietnam, but the evidence for these production locations consistently using Xinjiang cotton was considered not robust enough to justify including the additional data for these locations at this time.

The data included in this section was further narrowed based on the following criteria. First, relevant shipment records were selected based on specific HS codes referring to cotton products.⁵ For semi-finished cotton goods, this includes all HS codes beginning with 52 as well as certain codes beginning with 60. For finished cotton garments, the list of relevant HS codes includes certain codes starting with 61 and 62. See the table below for all the HS codes used.

HS Code	Goods
52.01	Cotton, not carded or combed
52.02 and further	Cotton waste (including yarn waste and garneted stock)
52.03	Cotton, carded or combed
52.04 and further	Cotton sewing thread, whether or not put up for retail sale
52.05 and further	Cotton yarn (other than sewing thread), containing 85% or more by weight of cotton, not put up for retail sale
52.06 and further	Cotton yarn (other than sewing thread), containing less than 85% by weight of cotton, not put up for retail sale
52.07 and further	Cotton yarn (other than sewing thread) put up for retail sale

52.08 and further	Woven fabrics of cotton, containing 85% or more by weight of cotton, weighing not more than 200g/m2
52.09 and further	Woven fabrics of cotton, containing 85% or more by weight of cotton, weighing more than 200g/m2
52.10 and further	Woven fabrics of cotton, containing less than 85% by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200g/m2
52.11 and further	Woven fabrics of cotton, containing less than 85% by weight of cotton, mixed mainly or solely with man-made fibers, weighing more than 200g/m2
52.12 and further	Other woven fabrics of cotton
6001.10, 6001.91	Pile fabrics, including "long pile" fabrics and terry fabrics, knitted or crocheted, of cotton
6003.20	Knitted or crocheted fabrics of a width not exceeding 30 cm, of cotton
6005.21 to 6005.24	Warp knit fabrics (including those made on galloon knitting machines), of cotton
6006.21 to 6006.24	Other knitted or crocheted fabrics, of cotton
6101.20	Men's or boys' overcoats, car-coats, capes, cloaks, anoraks (including ski-jackets), wind-cheaters, wind-jackets and similar articles, knitted or crocheted, of cotton
6102.20	Women's or girls' overcoats, car-coats, capes, cloaks, anoraks (including ski-jackets), wind-cheaters, wind-jackets and similar articles, knitted or crocheted, of cotton
6103.22, 6103.32, 6103.42	Men's or boys' suits, ensembles, jackets, blazers, trousers, bib and brace overalls, breeches and shorts (other than swimwear), knitted or crocheted, of cotton
6104.22, 6104.32, 6104.42, 6104.52, 6104.62	Women's or girls' suits, ensembles, jackets, blazers, dresses, skirts, divided skirts, trousers, bib and brace overalls, breeches and shorts (other than swimwear), knitted or crocheted, of cotton
6105.10	Men's or boys' shirts, knitted or crocheted, of cotton
6106.10	Women's or girls' blouses, shirts and shirt-blouses, knitted or crocheted, of cotton
6107.11, 6107.21, 6107.91	Men's or boys' underpants, briefs, nightshirts, pyjamas, bathrobes, dressing gowns and similar articles, knitted or crocheted, of cotton
6108.21, 6108.31, 6108.91	Women's or girls' slips, petticoats, briefs, panties, nightdresses, pyjamas, negligees, bathrobes, dressing gowns and similar articles, knitted or crocheted, of cotton
6109.10	T-shirts, singlets and other vests, knitted or crocheted, of cotton
6110.20	Jerseys, pullovers, cardigans, waistcoats and similar articles, knitted or crocheted, of cotton
6111.20	Babies' garments and clothing accessories, knitted or crocheted, of cotton

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6112.11	Track suits, ski suits and swimwear, knitted or crocheted, of cotton			
6114.20	Other garments, knitted or crocheted, of cotton			
6115.95	Panty hose, tights, stockings, socks and other hosiery, including graduated compression hosiery and footwear without applied soles, knitted or crocheted of cotton			
6116.92	Gloves, mittens and mitts, knitted or crocheted, of cotton			
6201.12, 6201.92	Men's or boys' overcoats, car-coats, capes, cloaks, anoraks (including ski- jackets), wind-cheaters, wind-jackets and similar articles, of cotton			
6202.12, 6202.92	Women's or girls' overcoats, car-coats, capes, cloaks, anoraks (including ski-jackets), wind-cheaters, wind-jackets and similar articles, of cotton			
6203.22, 6203.32, 6203.42	Men's or boys' suits, ensembles, jackets, blazers, trousers, bib and brace overalls, breeches and shorts (other than swimwear), of cotton			
6204.12, 6204.22, 6204.32, 6204.42, 6204.52, 6204.62	Women's or girls' suits, ensembles, jackets, blazers, dresses, skirts, divided skirts, trousers, bib and brace overalls, breeches and shorts (other than swimwear), of cotton			
6205.20	Men's or boys' shirts, of cotton			
6206.30	Women's or girls' blouses, shirts and shirt-blouses, of cotton			
6207.11, 6207.21, 6207.91	Men's or boys' singlets and other vests, underpants, briefs, nightshirts, pyjamas, bathrobes, dressing gowns and similar articles, of cotton			
6208.21, 6208.91	Women's or girls' singlets and other vests, slips, petticoats, briefs, panties, nightdresses, pyjamas, negligees, bathrobes, dressing gowns and similar articles, of cotton			
6209.20	Babies' garments and clothing accessories, of cotton			
6211.32, 6211.42	Track suits, ski suits and swimwear; other garments, of cotton			
6213.20	Handkerchiefs, of cotton			

Occasionally, when a search for these HS codes unexpectedly failed to yield results, a search with the term "cotton" was additionally carried out. This often revealed shipments containing cotton products according to their descriptions yet recorded under different HS codes (e.g. referring to synthetic fabric), as well as shipments containing other types of finished cotton products (such as bedsheets) rather than garments. Companies sourcing directly from the selected Chinese cotton suppliers were only included if they formed a supply chain leading to at least one well-known brand of clothing (or of other cotton products). When determining which brands to include here, the focus was placed on US and European brands considered generally known to consumers familiar with fashion brands—although this criteria obviously remains subjective. Wholesale distributors were generally excluded for practical reasons, so as to limit the overwhelming number of shipment records to process. Entities were only included if relevant shipments—incoming shipments from a Chinese supplier as well as outgoing shipments to brands—occurred within the past two years. The data selected spans from June 2019 to June 2021. An entity was only included if the last relevant shipment took place no more than one year ago, in this

case meaning after May 2020. This is to increase the likelihood that the supply chains may be currently relevant. Finally, relationships between entities were only noted if at least ten shipments have taken place between them within the delimited time frame, so as to filter out occasional shipments and focus on established business relationships. Notable shipments that do not fit all the aforementioned criteria are occasionally noted as such. Where possible, matches between fabrics or yarn supplied by Chinese textile enterprises and fabric compositions of finished garments sent to brands are shown where possible, in order to consolidate the link between cotton suppliers and brands. It should be noted that the international brands listed may receive their finished products at several different locations in a number of countries.

The significance of the relationship between two entities was assessed based on the number of shipments—and share of total shipments—that have taken place between them, rather than total weight or value of traded merchandise. Though it may have been preferable to use weight or volume as an indicator of the significance of a supplier/customer relationship, we used number of shipments because data for the other categories are often missing, falsely labeled at 0, or otherwise seemingly unreliable (the indicated volume may be unrealistically low considering the shipment's content description).

Supply chain connections were noted even when a Chinese manufacturer is a relatively minor supplier of cotton products to an intermediary manufacturer. We include these because it is impossible from available records to know for which international brand's apparel that potentially tainted cotton is being sourced. Knowledge that a supplier is sourcing from Chinese companies that have sourced Xinjiang cotton empowers the international brands to investigate their supply chains and ensure that they are not receiving forced-labor-tainted cotton goods.

It is important to note the limitations of gathering information through Panjiva and the implications of the data discussed below. Besides the aforementioned cases of missing or false information in shipment records, it is also likely that many shipments and entities involved in the international trade of Xinjiang cotton are missing entirely from the database. For example, there is no information to be found on cotton products sent abroad by train through Xinjiang's western borders, as no relevant shipments records have been provided since 2018. Searching for specific Chinese textile enterprises previously identified through media articles and other online sources—often failed to yield any results. In some cases the lack of data may be due to a country's customs agencies not providing import and export records, while in other cases, importers or exporters may have requested results pertaining to their business relationships be redacted.⁶ These limitations mean that the data discussed below should be regarded as "the tip of the iceberg" rather than as a comprehensive representation of the international Xinjiang cotton trade network. Trends observed may also be misleading due to missing data: for example, the majority of garment manufacturers encountered along supply chains are located in Indonesia, but this is partially due to Indonesian customs records being more regularly updated compared to some other countries (e.g. Vietnam). In actuality, there may be many more manufacturers serving as intermediaries for Chinese textile enterprises to foreign brands, especially in countries that do not appear in the available data. Nonetheless, the available data remains valuable for uncovering multi-tier supplier relationships.

Note: in the discussion below, any reference to proportion of shipments refers to proportions of number of shipments, based on data made accessible through the Panjiva platform and may not represent all shipments from or to the mentioned companies.

LUTHAI TEXTILE CO. LTD.

鲁泰纺织股份有限公司

Intermediary Manufacturers	Downstream Supply Chain Risk		
Aditya Birla, Aquarelle, Chenfeng Jiangsu Apparel, Daenong Global, Laguna Clothing, Masterindo Jaya Abadi, Metro Garmin, Odem Internacional, Samwon Busana, Shahi Export, Starpia, Ungaran Sari Garments, Zodiac Clothing	Aigle, Ann Taylor, Banana Republic, Bestseller, Brooks Brothers, C&A, Calvin Klein, Carrefour, Cinq Huitiemes, Costco, Daenong Korea, Decathlon, Eddie Bauer, Eileen Fisher, Express, Frank & Eileen, G-III Apparel, Gap, Guess, H&M, Hanes, It's Greek to Me, J. Crew, J. Jill, JC Penney, Jos A Banks, Kmart, Kohl's, L.L. Bean, Lacoste, Lands' End, Lee Wrangler, Levi Strauss, Lf Men's Group, Lilly Pulitzer, Lucky Brand, Lululemon, Macy's, Madewell, Marc O Polo, Marks & Spencer, Men's Wearhouse, Old Navy, Olymp, Outerknown, Patagonia, Pepe Jeans, Perry Ellis, PVH Corp, Ralph Lauren, Reiss, River Island, s. Oliver, Southern Tide, Superdry (DKH Retail), Talbots, Target, Theory, Tommy Hilfiger, Uniqlo, Vineyard Vines, Walmart, WE Fashion		

Luthai Textile Co. Ltd (also spelled Lutai or Lu Thai), based in Zibo, Shandong province, is a textile enterprise with vertically integrated production, from spinning to weaving to clothing manufacturing. According to the company, as of 2020, Lu Thai's global market share of "yarn dyed fabrics for medium and high-end shirts" amounts to 18%. Around 70% of Luthai's products are exported abroad—mainly to the United States, European Union, and Japan—and the company has also established production bases in Vietnam, Cambodia, and Myanmar.⁸

A number of brands identified as customers of Luthai have reportedly started working to ensure cotton produced by forced Uyghur labor is removed from their supply chain; others denied benefiting from production in Xinjiang or refused to comment.⁹ In October 2020, members and endorsers of the Coalition to End Forced Labour in the Uyghur Region published a written submission to the U.K. Parliament in which they urged all U.K. apparel brands to cease trading with Luthai (and others suppliers linked to Xinjiang) as well as to dig deeper into their supply chains in order to eliminate sub-suppliers based in or sourcing from Xinjiang.¹⁰

XUAR Sourcing

Xinjiang Luthai Fengshou Cotton Industry Co., Ltd. (新疆鲁泰丰收棉业有限公司) or Xinjiang Luthai was a wholly-owned subsidiary under Luthai Textile until August 2020.¹¹ It is located in Xinjiang's Aksu prefecture, Awat county.¹² Its business scope includes the purchase, processing, and sale of cotton and its byproducts and the production and sale of cotton textile and yarn.¹³ According to a 2019 media report, yarn spun by Luthai Fengshou is "mainly shipped" to Luthai's Shandong headquarters,¹⁴ where Luthai's fabrics are produced. In late 2020, Luthai Fengshou manager Li Jingquan stated the company's annual output had reached 20,000 tons of lint cotton and 5,000 tons of yarn, which are sold to enterprises in "Zhejiang, Shandong, and other places" for the production of clothing and textile products for export.¹⁵

In August 2020, Luthai sold its majority stake in Xinjiang Luthai Fengshou,¹⁶ stating that it now does not have "any equity stake or related investment in Xinjiang." However, Li Jingquan, the new owner of Xinjiang Luthai, owned 11.75% of Luthai's shares and already held the position of board member and general manager of Xinjiang Luthai before Luthai Textile Co., Ltd. shed its shares.¹⁷ Since the equity transfer, Li now owns 71.67% of Xinjiang Luthai Fengshou, having taken over Luthai's entire 59.92% share.¹⁸ Luthai says it no longer has investments in Xinjiang, but the company has not publicly stated that it has stopped sourcing cotton from Xinjiang Luthai or the Uyghur region in general.¹⁹ Luthai Fengshou's cotton processing plants and spinning mill have since also been renamed as Xinjiang Sanchang Fengshou Cotton Industry LLC (新疆三场丰收棉业有限责任公司) and Xinjiang Sanchang Textile Co. Ltd. (新疆三场纺织有限公司).²⁰

Luthai's annual reports from 2017 to 2019 indicate that the company mainly uses long-staple cotton, which, within China, is only produced in the Uyghur Region.²¹ Luthai's latest report for the year 2020 makes no mention of the XUAR (except for the sale of Xinjiang Luthai Fengshou) or the origin of the raw cotton materials used by the company. However, Luthai's 2020 corporate reports reveal that the company received over CNY 1 million in subsidies for shipping cotton out of the XUAR, which matches the amount the company received in the previous year.²² Additionally, Luthai continued to receive over CNY 4 million in subsidies for the transportation of cotton yarn specifically, though this was down from over CNY 11 million in 2019. Considering over 85% of China's cotton is sourced from the Uyghur Region, and since Luthai has continued to receive subsidies to transport cotton and yarn out of the Uyghur Region based on its most recent report, there is very high risk that Luthai is continuing to buy materials from its former subsidy or from other factories in the Uyghur Region.

Engagement in Labor Transfers:

Luthai's track record in the Uyghur Region reveals years of engagement in labor transfer programs and related subsidies from the Xinjiang government. It has reportedly "absorbed" a large number of "surplus laborers" from local rural areas and participated in vocational training programs promoted by the government to "transfer surplus rural labor to labor-intensive industries" and transform local farmers and "impoverished households" into textile workers.²³ One local news report indicated that the training of textile and garment industry workers employed by Xinjiang Luthai Fengshou was "conducted in a centralized and closed militarized management mode" and including Mandarin language training, which are often signs of compulsory or forced labor that restricts the movement of the workers.²⁴ Furthermore, in 2017, Luthai received government "subsidies for the newly recruited security personnel" (新招录安保人 员补贴) for the amount of CNY 129,778, which could be indicative of an increase of securitizing factories coincident with the rise of increased repression and policing of minoritized citizens in the region.²⁵

Intermediary Manufacturer and Downstream Supply Chain

PT Ungaran Sari Garments

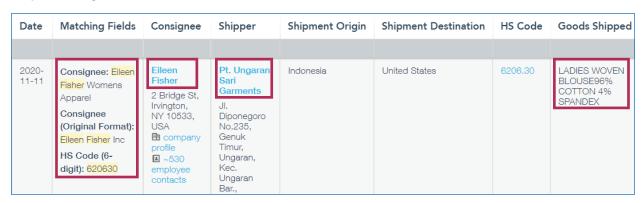
Luthai is Indonesian manufacturer Ungaran Sari Garments' (USG) second biggest supplier of cotton fabrics, at just under 10% of total received shipments. According to customs records, USG ships cotton garments to the brands Eileen Fisher, Lilly Pulitzer, PVH Corp, Lucky Brand, Men's Wearhouse, Ann Taylor, J. Crew, Tommy Hilfiger, Calvin Klein, Macy's, L.L. Bean, Kohl's, Brooks Brothers, Lululemon, Madewell, Ralph Lauren, Walmart, Perry Ellis, G-III Apparel, Talbots, Vineyard Vines, Jos A Banks, and J. Jill. Many of these brands have not previously been identified in news articles in relation to Luthai.

Between late 2019 and late 2020, **Eileen Fisher**²⁶ received seven shipments from USG containing garments made of 96% cotton and 4% elastane (the brandname of which is Spandex). 75% of USG's total shipments containing fabric with this specific composition were sourced from Luthai or Luthai subsidiary Lufeng.

Shipment of fabric from Luthai to USG

Date	Matching Fields	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2020- 10-19	Goods Shipped: Woven Fabric 96% Cotton 4% Elastane HS Code (2-digit): 52	Pt Ungaran Sari Garments JI. Diponegoro No.235, Genuk Timur, Ungaran, Kec. Ungaran Bar.	Luthai Textile Zichuan District, Zibo, Shandong, China Company profile	China	Indonesia	5208.42	WOVEN FABRIC 96% COTTON 4% ELASTANE

Shipment of garments from USG to Eileen Fisher



Luthai Shandong has supplied around 13% of USG's 100% cotton fabric shipments and Luthai's subsidiary Lufeng has supplied just over 6%, totaling about fifth of USG's 100% cotton fabric supply. A shipment from USG to US brand **Lilly Pulitzer** (specifically to its parent company Sugartown Worldwide) of 100% cotton dresses could be made of that fabric. The bill of lading contains a product name in its description. The specific garment can be found for sale on the brand's website.

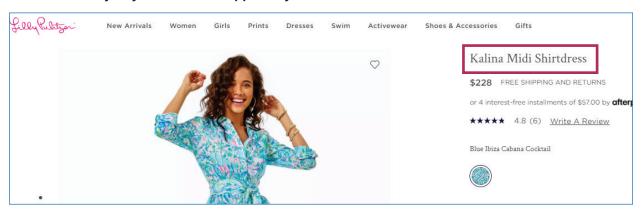
Shipment of fabric from Luthai to USG

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2021-	Pt Ungaran Sari	Luthai	China	Indonesia	5208.42	FABRIC 100% COTTON
04-06	Garments	Textile			<u> </u>	
	Jl. Diponegoro No.235, Genuk	Zichuan District,				
	Timur, Ungaran,	Zibo,				

Shipment of 100% cotton Kalina Midi Shirt Dress from USG to Lilly Pulitzer



Garment sold by Lilly Pulitzer and supplied by USG²⁷



Luthai subsidiary Lufeng has provided just under 8% of USG's total cotton fabric shipments. The two screenshots below show a match between fabric received by USG from Lufeng and goods subsequently shipped from USG to **PVH Corp** in the US. Virtually all (97%) shipments containing this fabric composition (74% cotton, 23% nylon, 3% elastane/spandex) were supplied to USG by Lufeng and parent company Luthai.

Shipment of 74% cotton, 23% nylon, 3% elastane/spandex fabric from Lufeng to USG



Shipment of men's shirts made of 74% cotton, 23% nylon, 3% elastane/spandex from USG to PVH Corp



Metro Garmin

Luthai and its subsidiaries constitute the biggest supplier of cotton fabrics (over 3000 shipments over a period of 2 years) to Indonesian manufacturer Metro Garmin. Together, Luthai companies account for over 55% of cotton fabric shipments to this Indonesian factory.

From Metro Garmin, cotton garments are sent to the German brand **Olymp**, **Lf Men's Group**, **Lands' End**, **Southern Tide**, and **Costco**. Many cotton fabric shipments from Luthai to Metro Garmin specify the label BCI cotton.²⁸

One of the fabrics used in garments manufactured by Metro Garmin has a specific composition of 97% BCI cotton and 3% XLA (or elastolefin), a stretchy synthetic fiber. Almost 40% of shipments containing this type of fabric were received from Luthai. Another 37% were supplied by Luthai's subsidiary Lufeng, together accounting for roughly 77% of all received shipments containing this material. Most garments of this fabric composition were sent to the brand **Olymp** in Germany.

Shipment of 97% BCI cotton and 3% XLA (or elastolefin) fabric from Luthai to Metro Garmin

Date Consign	nee Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
Toha KM	Dhammad Zichuan 17, Jl. District, Zibo, yeuhkolot Shandong, China	China	Indonesia	5208.43	97%BCI COTTON 3% XLA YARN DYED FABRIC

Shipment of 97% BCI cotton and 3% XLA (or elastolefin) garments from Metro Garmin to Olymp

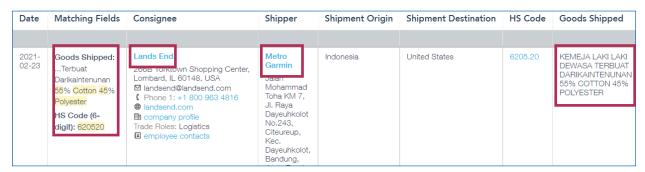
Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2021- 03-12	Olymp Bezner Kg Bietigheim- Bissingen, Germany	Metro Garmin Jaian Mohammad Toha KM 7, Jl. Raya Dayeuhkolot	Indonesia	Germany	6205.20 Shirts; men's or boys', of cotton (not knitted or crocheted)	KEMEJA LAKI LAKI DEWASA TERBUAT DARIKAINTENUNAN 97% COTTON 3% ELASTOLEFIN
	profile	No.243,			3,33,,3100)	

Metro Garmin has sent over 100 shipments of shirts composed of 55% cotton and 45% polyester as recently as March 2021 to **Lands' End** and **Lf Men's Group** in the US. The vast majority of fabrics with this specific fabric composition (roughly 90%) sourced by Metro Garmin came from Lufeng.

Shipment of 55% cotton and 45% polyester fabric from Lufeng to Metro Garmin



Shipment of 55% cotton and 45% polyester garments from Metro Garmin to Lands' End



Chenfeng Jiangsu Apparel

Chenfeng Jiangsu was listed as one of Luthai's top five buyers in the company's 2017 corporate report, but in following years, names of buyers were no longer published.²⁹ However, a 2020 media article about Luthai's response to the pandemic lists Chenfeng as a customer.³⁰ In June of 2021, Chenfeng hosted a climate action partner dialogue at their headquarters; the China Textile Federation Social Responsibility Office reported that the event included participation from Chenfeng supplier Luthai and major customer **Fast Retailing Group**, parent company of Uniqlo.³¹ As the domestic Chinese shipments do not appear in custom records, it is unclear how many transactions have taken place between the two companies. However, in January 2021, a shipment destined for Uniqlo was detained by U.S. Customs and Border Protection for carrying cotton garments that could not be proven not to have been made in part with forced labor and involvement of the XPCC.³² The goods in question were manufactured by Chenfeng Jiangsu Apparel and materials were supplied by Luthai. Based on the available customs data, Chenfeng Jiangsu Apparel ships to the brands **Uniqlo**, **Theory**, US denim brand **Outerknown**, collegiate wear company **It's Greek to Me**, as well as the brand **Patagonia** (a business relationship that is confirmed on Patagonia's website).³³

(Note: Chenfeng is not an international manufacturer, but it does act as an intermediary for Luthai fabric, so we have included it here.)

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Aditya Birla Fashion Retail

Luthai is the top supplier of cotton fabrics to Aditya Birla Fashion Retail (India), accounting for around 25% of received shipments and shipments from Lufeng accounting for an additional ~6% of total cotton fabric shipments. Aditya Birla ships cotton garments to brands **Marc O'Polo**, **Superdry**, **Lacoste**, and French companies **Aigle** and **Cinq Huitiemes**.

Laguna Clothing

Laguna Clothing is a manufacturer located in India which has received around 20% of its cotton fabrics from Luthai. It has sent cotton garments to **Bestseller** (a Danish clothing company with a number of different brands established in Europe, such as Only, Vero Moda, Vila, Pieces, and Selected), **Tommy Hilfiger**, **Reiss**, **Ralph Lauren**, **Express**, **Marks & Spencer**, **PVH Corp**, and **Carrefour**, a French supermarket chain with franchises in many countries including China.

Masterindo Jaya Abadi Just under 4% of cotton fabric shipments received by **Masterindo Jaya Abadi** originated from Luthai and 7.5% from subsidiary Lufeng. This Indonesian factory ships to US clothing company **G-III Apparel** and German brand **s. Oliver**. G-III Apparel Group supplies name brands including Calvin Klein, DKNY, Guess, and Levi's.³⁴

Daenong Global

Daenong Global is a South Korean-owned manufacturer in Indonesia which has received cotton fabrics from Luthai and ships garments containing cotton to various **Uniqlo** locations around the world, as well to US brand **Hanes** and to **Kmart**. Daenong has also sent shipments to its own headquarters in Seoul, with descriptions indicating the garments are destined for foreign brands. Luthai is Daenong Global's top supplier of 100% cotton fabric (mostly labeled BCI), accounting for just over 17% of Daenong Global's total incoming 100% cotton fabric shipments.

Starpia

Luthai has sent cotton fabrics to Indonesian company Starpia, which in turns sends garments containing cotton mainly to **Uniqlo** in the US, Europe, Australia, and other locations.

Based on available shipping records, Luthai appears to be Starpia's sole supplier of fabric composed of 76% cotton and 24% linen. All Starpia shipments containing garments made of this fabric were sent to Uniqlo branches (in the United States, Canada, the Netherlands, Taiwan, South Korea). The Starpia shipment description below indicates the specific product style number shipped to Uniqlo, which was matched to a specific garment. The product is being sold on Uniqlo's US website.

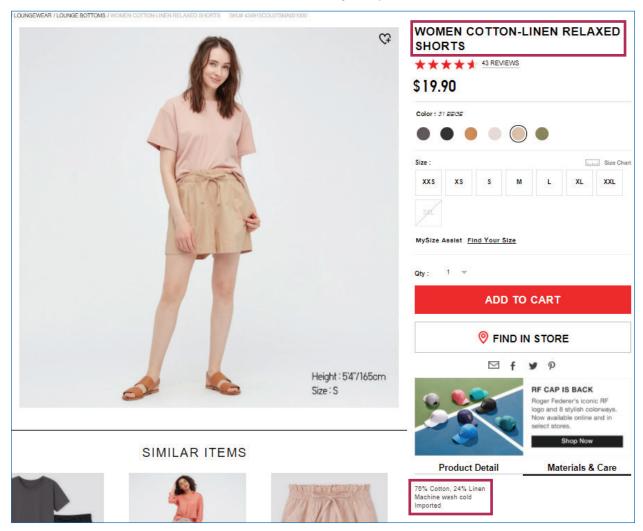
Shipment of 76% cotton and 24% linen fabric from Luthai to Starpia



Shipment of 76% cotton and 24% linen relax shorts from Starpia to Uniqlo



Women's 76% cotton and 24% linen relax shorts sold by Uniqlo³⁵



Zodiac Clothing

Zodiac Clothing is an Indian manufacturer that sourcesjust under 5% of its cotton fabrics supply from Luthai and Lufeng. The factory ships cotton garments to the brands **Guess**, **River Island**, **WE Fashion**, **Gap**, and **G-III Apparel**.

Odem Internacional

Garment manufacturer **Odem Internacional,** located in Mexico, has received just under 5% of its cotton fabric shipments from Luthai. Available data only shows shipments of cotton garments to US brand **Frank & Eileen**.

Manufacturers receiving 3% or less of their fabric from Luthai and/or Lufeng

While accessible shipping records provide information to show the following companies may receive only a nominal amount of fabric supplied by Luthai, international brands that are supplied by these companies should conduct due diligence to determine if their products are made with Luthai fabrics.

Samwon Busana

Samwon Busanais a South Korean-owned garment manufacturer located in Indonesia. Cotton fabrics supplied by Luthai account for just over 2% of received shipments, according to Panjiva's accounting. Samwon Busana supplies garments containing cotton to American department stores **Macy's** and **Kohl's**.

Aquarelle India

Aquarelle India is a company which has sourced roughly 3% of its cotton fabrics from Luthai, and ships cotton garments to **PVH Corp**, **Bestseller**, **Levi Strauss**, **Pepe Jeans**, **Target**, **Tommy Hilfiger**, and **Lee Wrangler**.

Shahi Export

Although the amount of cotton fabric received from Luthai is limited (just over 1% of total cotton fabric shipments), Indian manufacturer Shahi Export ships cotton garments to a considerable number of brands that may be buying garments made of Luthai fabrics, including H&M, Decathlon, Old Navy, Gap, Kmart, PVH Corp, Walmart, Tommy Hilfiger, Kohl's, Mark & Spencer, Levi's, Uniqlo, JC Penney, Eddie Bauer, G-III Apparel, C&A, Calvin Klein, Target, and Banana Republic.

JIANGSU LIANFA TEXTILE CO. LTD.

江苏联发纺织股份有限公司

Downstream Supply Chain Risk
American Eagle, Ann Taylor, Banana Republic, Bestseller, Brooks
Brothers, Calvin Klein, Costco, Duluth Trading, Eddie Bauer, Eileen
Fisher, G-III Apparel, Gap, H&M, J. Crew, J. Jill, Jack Wolfskin, Jos
A Banks, Kohl's, Lacoste, L.L. Bean, Lands' End, Lee Wrangler, Levi
Strauss, Lf Men's Group, Lilly Pulitzer, Lucky Brand, Lululemon,
Macy's, Madewell, Men's Wearhouse, Olymp, Pepe Jeans, Perry Ellis,
PVH Corp, Ralph Lauren, s. Oliver, Southern Tide, Talbots, Target,
Tom Tailor, Tommy Hilfiger, VF Corporation, Vineyard Vines, Walmart

Jiangsu Lianfa Textile Co., Ltd. is a large-scale textile enterprise integrating spinning, dyeing, weaving, finishing and garment making based in Hai'an, Nantong, Jiangsu province. The company reports that it exports 65% of its products to Japan, the United States, and more than 30 other countries.³⁶ According to the company's 2019 Annual Report, Nantong Lianfa Printing and Dyeing is a subsidiary of Jiangsu Lianfa that relies exclusively on cotton supplied from Xinjiang.³⁷

XUAR Sourcing

According to Jiangsu Lianfa's corporate reports as well as online sources, Aksu Lianfa Textile (阿克苏 天翔家纺有限公司) is a wholly-owned subsidiary located in Xinjiang's Aksu Textile Industrial City.38 The company's 2020 semi-annual report also indicates that expansion of this subsidiary is in progress.³⁹ In September 2020, Aksu Lianfa was renamed Aksu Tianxiang Home Textile (阿克苏天翔家纺有限公 司).⁴⁰ Yarn produced at Aksu Lianfa/Tianxiang is sold directly to Jiangsu Lianfa Textile.⁴¹ Jiangsu Lianfa's 2019 annual report confirms that the company's presence in the XUAR "takes advantage of the regional advantages in Xinjiang and has obvious cost advantages to supply home textile undyed fabric raw materials for the company's downstream processes."42 In an October 2019 announcement regarding the investment project to expand production capacity at Aksu Lianfa/Tianxiang, the company stated that "the commissioning of the project will provide self-sufficiency for the company's home textile downstream processes (Nantong Lianfa Tianxiang Printing and Dyeing Co., Ltd)."43 This suggests that the cotton supplied through the company's subsidiary in the XUAR represents a significant portion of the company's total cotton supply, at least enough to facilitate the entire production at one of its mainland subsidiaries, Nantong Lianfa Printing and Dyeing (南通联发天翔印染有限公司).44 Based on a 2020 audit report, Jiangsu Lianfa has received government subsidies to offset the costs of shipping cotton out of the XUAR to its mainland facilities and for shipping equipment to Xinjiang.⁴⁵ Over the years 2018 and 2019, Jiangsu Lianfa received over CNY 4 million in subsidies from the XUAR government to ship the company's cotton products out of the region, as well as over CNY 7 million from the Aksu Textile Industrial City.

Engagement in Labor Transfers

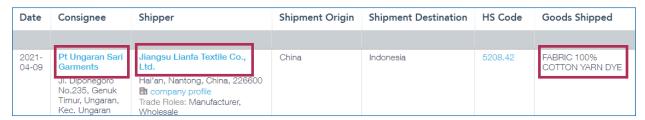
Media articles describe how Aksu Lianfa and other "workshops" employ rural laborers who have been transferred to Aksu Textile Industrial City, which is described as an "important base" for "driving the transfer of surplus rural labor in the four prefectures of southern Xinjiang." These sources indicate that Aksu Textile Industrial City plays an important role in "absorbing surplus rural labor," with rural workers being transferred to the area "under the mobilization and organization of the local government" to increase production capacity. He in order to fulfill the demand for labor in the textile industry, the Aksu Textile Industrial City carries out vocational training to "transform farmers into industrial workers," facilitated by the implementation of "pre-job training subsidies." The focus of this training is described as "laws and regulations, national common language, labor discipline, military training, and production safety." The Lianfa 2020 audit report indicates the Aksu Textile Industrial City allocated "pre-job training subsidies" for the amount of CNY 441,600 in 2019, Possibly referring to coercive labor training schemes.

Intermediary Manufacturer and Downstream Supply Chain

PT Ungaran Sari Garments

PT Ungaran Sari Garments (USG) is Jiangsu Lianfa's biggest purchaser of cotton fabric. According to customs records, USG ships cotton garments to the brands **Eileen Fisher**, **Lilly Pullitzer**, **PVH Corp**, **Lucky Brand**, **Men's Wearhouse**, **Ann Taylor**, **J. Crew**, **Tommy Hilfiger**, **Calvin Klein**, **Macy's**, **L.L. Bean**, **Kohl's**, **Brooks Brothers**, **Lululemon**, **Madewell**, **Ralph Lauren**, **Walmart**, **Perry Ellis**, **G-III Apparel**, **Talbots**, **Vineyard Vines**, **Jos A Banks**, and **J. Jill**.

Shipment of 100% cotton yarn dyed fabric from Jiangsu Lianfa to USG



Shipment of 100% cotton garments from USG to Lands' End



Nantong Lianfa Printing and Dyeing is a subsidiary of Jiangsu Lianfa that relies exclusively on cotton supplied from Xinjiang. ⁴⁹ **USG** is one of Nantong Lianfa's main customers. Nantong Lianfa is one of the top suppliers of a fabric composed of 54% cotton, 37% polyester, 9% spandex/elastane. Roughly 29% of shipments with this fabric received by USG came from Nantong Lianfa, while another 13% came from Jiangsu Lianfa. Garments made of this fabric have largely been sold to **PVH Corp**.

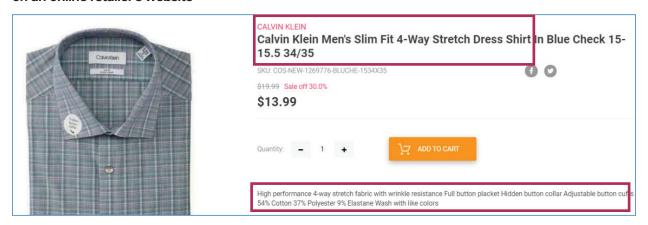
Shipment of 54% cotton, 37% polyester, 9% spandex/elastane fabric from Nantong Lianfa to USG



Shipment of 54% cotton, 37% polyester, 9% spandex/elastane men's shirt from USG to PVH Corp



Calvin Klein (a PVH Corp brand) men's shirt made of 54% cotton, 37% polyester, 9% spandex/elastane on an online retailer's website⁵⁰



Samwon Busana

Jiangsu Lianfa is Samwon Busana's top supplier of 100% cotton fabric, accounting for roughly 34% of received shipments. Most of Samwon Busana's 100% cotton garments are sent to Macy's and Kohl's.

Shipment of 100% cotton fabric from Jiangsu Lianfa to Samwon Busana



Shipment of 100% cotton garments from Samwon Busana to Kohl's



Samwon Busana is also supplied by Nantong Lianfa, receiving just under 4% of their cotton fabrics from this supplier that reports that it relies exclusively on Xinjiang cotton.

Anggun Kreasi Garmen

Anggun Kreasi Garmen is an Indonesian factory that has received around 17% of all its cotton fabrics from Jiangsu Lianfa. This manufacturer sells to German brands **Tom Tailor** and **s. Oliver**, **Tommy Hilfiger**, and **PVH Corp**.

Ameya Livingstyle

Jiangsu Lianfa provides just under 6% of Indonesian factory Ameya Livingstyle's total incoming cotton fabric shipments, but the company is Ameya's top supplier of 100% cotton fabrics at 17% of total received shipments. Ameya Livingstyle ships cotton garments to German brands **Tom Tailor**, **Jack Wolfskin**, and **s. Oliver**, as well as to **H&M** and **VF Corporation** (a US apparel company that owns brands such as Timberland, The North Face, Vans, Kipling, and JanSport).⁵¹

Shipment of fabric from Jiangsu Lianfa to Ameya Livingstyle



Shipment of garments from Ameya Livingstyle to s. Oliver



Aquarelle India

Jiangsu Lianfa is the top supplier of cotton fabrics to Indian manufacturer Aquarelle India, providing roughly 22% of total imported cotton shipments. The Nantong Lianfa subsidiary that is supplied exclusively by Xinjiang cotton has shipped just over 12% of Aquarelle India's total incoming cotton fabric shipments.

Aquarelle ships cotton garments to **PVH Corp**, **Bestseller**, **Levi Strauss**, **Pepe Jeans**, **Target**, **Tommy Hilfiger**, and **Lee Wrangler**.

Between July 2020 and April 2021, Levi Strauss received over 20 shipments from Aquarelle containing men's shirts made of 55% cotton, 43% polyester, 2% elastane/spandex. A third of the shipments received by Aquarelle containing fabric of this composition came from Jiangsu Lianfa, over 50% came from Jiangsu Lianfa's subsidiary Nantong Lianfa, and the remaining shipments originated from Luthai.

Shipment of 55% cotton, 43% polyester, 2% elastane/spandex fabric from Jiangsu Lianfa to Aquarelle India



Shipment of 55% cotton, 43% polyester, 2% elastane/spandex garments from Aquarelle to Levi Strauss



Smart Shirts

Although Jiangsu Lianfa is not a major supplier to Sri Lankan manufacturer Smart Shirts, it is the only supplier to have provided fabrics composed of 90% cotton and 10% elastane. Smarts Shirts has sent garments made of this fabric to **Ralph Lauren**. The brands **L.L. Bean** and **Lacoste** also source from Smart Shirts. This manufacturer produces and sends their products from several countries: Vietnam, Cambodia, Sri Lanka, China. Only L.L. Bean receives shipments exclusively from the Sri Lanka location.

Shipment of fabrics from Jiangsu Lianfa to Smart Shirts



Shipment of garments from Smart Shirts to Ralph Lauren



Eam Maliban Textiles

Jiangsu Lianfa is a minor supplier of cotton fabrics (just over 1% of total received cotton shipments) to the factory of Eam Maliban Textiles located in Sri Lanka. According to the available data, however, only three shipments of 59% cotton/39% polyester/2% spandex fabric were received by Eam Maliban, all of them supplied by Jiangsu Lianfa. Shipping records show a match between that fabric composition provided by Jiangsu Lianfa and garments sent to **Banana Republic** in the United States. Other brands that have received garments made of this same fabric are **Gap** and **Kohl's**. Eam Maliban also sends cotton garments to **Tommy Hilfiger**, **Eddie Bauer**, and **PVH Corp**.

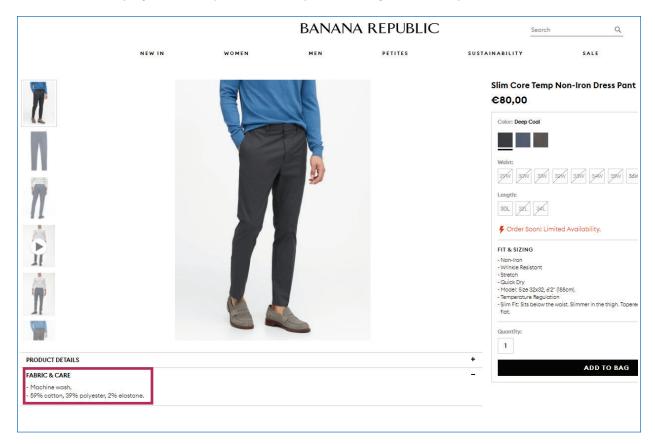
Shipment of 59% cotton/39% polyester/2% spandex fabric from Jiangsu Lianfa to Eam Maliban Textiles



Shipment of 59% cotton/39% polyester/2% spandex men's pants from Eam Maliban Textiles to Banana Republic



59% cotton/39% polyester/2% spandex men's pants sold by Banana Republic⁵²



Inti Sukses Garmindo

Jiangsu Lianfa has provided roughly 6% of all received shipments containing 100% cotton fabric to Indonesian manufacturerInti Sukses Garmindo. Inti Sukses ships cotton garments to **Ralph Lauren**, **s. Oliver**, and **Tommy Hilfiger**.

Masterindo Jaya Abadi

Masterindo Jaya Abadi received just around 1.5% of its cotton fabrics from Jiangsu Lianfa. James Fabric is a Jiangsu Lianfa subsidiary that also ships cotton fabrics to Indonesian manufacturers, including Masterindo Jaya Abadi, constituting another 3% of its shipments of cotton goods. This Indonesian factory ships to US clothing company **G-III Apparel** and German brand **s. Oliver**. G-III Apparel Group supplies name brands including Calvin Klein, DKNY, Guess, and Levi's.⁵³

Manufacturers receiving 3% or less of their fabric from Jiangsu Lianfa

While accessible shipping records provide information to show the following companies may receive only a nominal amount of fabric supplied by Lianfa, international brands that are supplied by these companies should conduct due diligence to determine if their products are made with Lianfa fabrics.

Metro Garmin

Jiangsu Lianfa accounts for just under 2% of **Metro Garmin's** received cotton shipments. Shipment descriptions include mention of BCI cotton. James Fabric is a Jiangsu Lianfa subsidiary⁵⁴ that also ships cotton fabrics to Indonesian manufacturers, including Metro Garmin.Metro Garmin supplies cotton garments to the German brand **Olymp**, **Lf Men's Group**, **Lands' End**, **Southern Tide**, and **Costco**.

Eratex Djaja

Indonesian factory Eratex Djaja is a minor customer of Jiangsu Lianfa's 100% cotton fabric (less than 1%). Cotton garments are sent from Eratex Djaja to **Ann Taylor**, **Ralph Lauren**, **Brooks Brothers**, **American Eagle**, and **Duluth Trading**.

HUAFU FASHION CO. LTD.

华孚时尚股份有限公司

Intermediary 1	Intermediary 2 Downstream Supply Chain Risk	
Hayleys Fabric, Indo	Brandix Apparel, Eins	Adidas Canada, American Eagle, Aritzia, Ascena Retail,
Taichen Vietnam, New Lanka Trading,	Vina, Hela Intimates, Itaca Textiles, MAS Active, MAS	C&A, Calvin Klein, Calzedonia, Carrefour, Eddie Bauer, Eileen Fisher, Everlane, Gap, Hanes, Lacoste, Levi's,
South Asia Textile Sri Lanka, Teejay Lanka,	Intimates, Nobland Vietnam, Seshin Vietnam, Thanh	Lululemon, Marks & Spencer, Michael Kors, Nike, Old Navy Canada, Patagonia, Primark, PVH Corp, Ralph
Win Textile,Wintai	Cong Textile Garment, Tung	Lauren, SAXX Underwear, Target, Third Love, Tommy
Garment	Mung Textile	Hilfiger, Uniqlo

Headquartered in Shenzhen⁵⁵ and registered in Huaibei,⁵⁶ Huafu Fashion Co. Ltd. (华孚时尚股份有限公司) is vertically integrated from cotton planting and processing to yarn spinning to textile manufacturing. It has production bases in Zhejiang, Jiangxi, and Jiangsu provinces, and the Xinjiang Uyghur Autonomous Region. Additionally, it has established production facilities in Vietnam.⁵⁷ Huafu often sells cotton yarn to international intermediary manufacturers that then produce fabric for sale to another intermediary that manufactures the finished products for sale to international markets.

Media and advocacy reports have exposed Huafu's participation in labor transfer programs in the Uyghur Region and identified many famous international brands as its customers.⁵⁸ Huafu has since stated that sanctions on Xinjiang cotton have started to affect their business with foreign brands, with orders being cancelled, resulting in upwards of 54 million USD in losses in 2020.⁵⁹

XUAR Sourcing

Huafu began investing in the Uyahur Region in 2006, and its ongoing presence in the region is confirmed on its website. The website claims "Huafu has 8 million mu [roughly 1,318,000 acres] of highquality cotton fields at Awati along the Tarim River."60 Like other leading Chinese textile companies, Huafu has settled in the Aksu Textile Industrial City.⁶¹ Huafu expanded its activities in the region by cooperating with Xinjiang Cotton Industrial Group and jointly establishing Xinjiang Tianfu Cotton Supply Chain Co., Ltd. (新疆天孚棉花供应链股份有限公司) in the Kashgar Economic Development Zone (through its wholly-owned subsidiary Shenzhen Huafu Netchain Investment Co., Ltd.), 62 Huafu also owns Xinjiang Hengfu Cotton Industry Group, located in Urumqi High-tech Industrial Development Zone. 63 In August 2018, Huafu launched the "world's largest textile mill for spinning colored yarn" in Aksu, Xinjiang.⁶⁴ Huafu's own website also mentions the "Huafu Aksu Industrial Park," an expansive project, predicted to realize an annual output of 160,000 tons of yarn. ⁶⁵ Xinjiang Economic News reported that in 2018 that Huafu employs around 6000 people in Uchturpan, Bay, Onsu and other XUAR counties and is "expanding its production scale to drive more local people to find jobs nearby." It also claimed that the company owns as many as 30 ginning mills and 10 spinning mills in the XUAR alone.⁶⁶ Huafu Fashion's 2020 financial report lists a total of 75 different entities wholly owned or partially owned, including at least 30 entities registered in the XUAR.67

ANNEX C: SUPPLY CHAIN TRACING

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In a statement published in March 2021, the company defended its activities in the region and emphasized its reliance on Xinjiang cotton and "ethnic minority" employees. The company's 2020 corporate report lists government subsidies received for shipping cotton out of the XUAR, indicating that Huafu subsidiaries in mainland China receive the cotton processed in the company's XUAR subsidiaries. The amounts received—over CNY 80 million in 2020 and almost CNY 60 million in 2019—are also considerably higher than the cotton shipping subsidies allocated to the other enterprises reviewed for this report.

Engagement in Labor Transfers

A media report on the XPCC's poverty alleviation work contains mention of a group of "impoverished ethnic minority labor force" having been "transferred" to one of Huafu's factories "to achieve stable poverty alleviation through the transfer of employment," indicating that Huafu is implementing state-sponsored labor programs in cooperation with the XPCC. In 2018, Huafu (along with other major textile manufacturers) received an award for its poverty alleviation efforts. Two Uyghur women in their twenties, Arzugul Semet and Hanzohre Seydehmet, were described to the Xinjiang Victims Database by an anonymous police officer as being "subjected to a forced labor program at the Huafu textile factory in Aksu" after being held in an internment camp.

Intermediary Manufacturer and Downstream Supply Chain

Wintai Garment

Huafu Shenzhen is the second biggest supplier to Indonesian factory Wintai Garment, providing just under 35% of its total cotton yarn shipments. Some of the shipment descriptions indicate BCI cotton. Wintai Garment produces socks and exports them to **C&A** in Germany and to **Carrefour** locations in several countries.

Teejay Lanka

Shenzhen Huafu, Huafu Macao, and Huafu Hong Kong all supply cotton yarn to Sri Lankan manufacturer Teejay Lanka. Teejay Lanka, in turn supplies many other international intermediary manufacturers with fabric (see below). Teejay Lanka also directly supplies cotton fabric to **Calzedonia Group** in Italy. This Italian clothing company mainly produces underwear and owns several brands, such as Intimissimi. It runs a number of manufacturing locations in Northern Italy and a few abroad. Its production location in Ethiopia, called **Itaca Textile**, has also received cotton from Teejay Lanka, though the available data is very limited. There is barely any data showing export of finished clothing from Calzedonia locations in Northern Italy. Instead, Panjiva shows fabrics being sent from Calzedonia to factories in Sri Lanka, mainly Omega Line (which is one of Calzedonia's own manufacturing locations) and Alpha Apparels. These factories then send finished garments back to Calzedonia, likely destined for the local European market.

Indo Taichen Textile Industry

Huafu's production location in Vietnam is the top supplier of cotton yarn to Indonesian manufacturer Indo Taichen Textile Industry, and Huafu Shenzhen's shipments account for an additional ~8% of Indo Taichen's received cotton yarn. See below for manufacturers that purchase fabric from Indo Taichen.

South Asia Textile Industries

Just under 7% of cotton yarn shipments received by Sri Lankan manufacturer **South Asia Textile Industries** have come from Huafu Macao. Some of the shipments specify the label BCl cotton.

Hayleys Fabrics

Hayleys Fabric is a Sri Lankan factory which receives just under 4% of its cotton yarn shipments from Huafu Macao. Hayleys Fabric in turns ships cotton fabrics to MAS Intimates Bangladesh and Brandix Apparel (see below)

New Lanka Trading

Just under 10% of the cotton yarn shipments received by Sri Lankan manufacturer **New Lanka Trading** were supplied by Huafu Hong Kong. New Lanka Trading is Huafu Hong Kong's top buyer and supplies cotton fabrics to several international intermediary manufacturers.

MAS Intimates(via New Lanka Trading, Teejay Lanka, South Asia Textile, Hayley's Fabrics)

New Lanka Trading (see above) is the top supplier of cotton fabrics to MAS Intimates' Bangladesh location, accounting for over 53% of imported shipments. About 24% of cotton fabrics received by MAS Intimates Bangladesh originate from Teejay Lanka (see above). Between the two suppliers, MAS Intimates is at very high risk of manufacturing goods made of Xinjiang cotton.

MAS Intimates' production facilities are located in Kenya, Bangladesh, India, Jordan, and Sri Lanka. The Bangladesh location then ship cotton garments to **PVH Corp**.

MAS Intimates is also South Asia Textile's (see above) biggest customer of cotton fabrics. Shipments from South Asia Textile are sent to MAS Intimates' production locations in Kenya, Bangladesh, India, Jordan, and almost certainly their facility in Sri Lanka (though shipping records cannot account for domestic transactions). The factory in Kenya receives over 36% of its cotton fabrics from South Asia Textile. Both the Kenya and Bangladesh locations then ship cotton garments to **PVH Corp**.

MAS Intimates also receives cotton fabrics from Sri Lankan Hayleys Fabrics (see above).

MAS Intimates also sells cotton-based products to **Marks & Spencer**, **Primark**, **Third Love**, and **SAXX Underwear**. One Sri Lanka facility almost exclusively supplies **Gap Canada** and **Old Navy Canada**, including their cotton-based products.

Brandix Apparel (via Teejay Lanka, New Lanka, Hayley's Fabrics)

Brandix Apparel is Teejay Lanka's (see above) top buyer of cotton fabrics (given available shipping records). It has two production locations, in India and in Sri Lanka, both of which are customers of Teejay Lanka. Brandix's Indian location receives around 21% of its cotton fabrics from Teejay Lanka.

New Lanka Trading (see above) has provided almost 50% of cotton fabric shipments received by **Brandix Apparel**'s production location in India.

Brandix Apparel exports cotton garments to **Gap**, **PVH Corp**, **Uniqlo**, **Calvin Klein**, **Aritzia**, and **Ascena Retail** (American clothing retailer and parent company of the brands Ann Taylor, Ann Inc. and Loft).

Brandix Apparel also receives cotton fabrics from Sri Lankan Hayleys Fabrics (see above).

Hela Intimates (via Teejay Lanka, New Lanka)

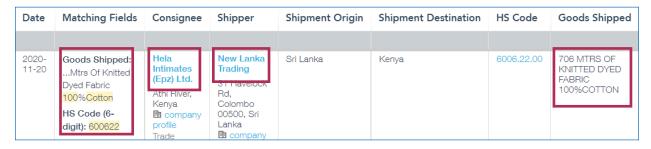
Over 62% of Hela Intimates' recorded cotton fabric shipments were received from Teejay Lanka (see above). Hela Intimates is a manufacturer specialized in underwear. Hela Intimates sends underwear and other types of garments containing cotton to **PVH Corp** and to **Michael Kors**.

Just over 22% of **Hela Intimates'** recorded cotton fabric shipments came from New Lanka Trading (see above). Based on the style numbers indicated in shipping bills of lading, it is possible to pinpoint a shipment of Tommy Hilfiger basic men's cotton t-shirts being sent from Hela Intimates to PVH Corp, which can be seen being sold on Walmart's website.

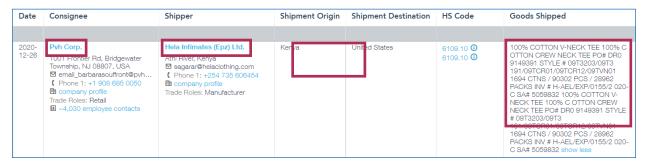
Shipment of 100% cotton yarn from Huafu Hong Kong to New Lanka Trading

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2020- 10-13	New Lanka Trading	Huafu Hongkong	Hong Kong	Sri Lanka	5205.11.00	42S/1 100% ORGANIC COTTON
10 10	Lot o B, Block A, Biyagama Export	Trading Co., Ltd.	Trading Co.,			COMPACT HG YARN 50S/1
	Processing Zone, Walgama, Malwana, Sri	1502, Clifford Centre, 778- 784 Cheung				HATHA GREY (REGULAR)

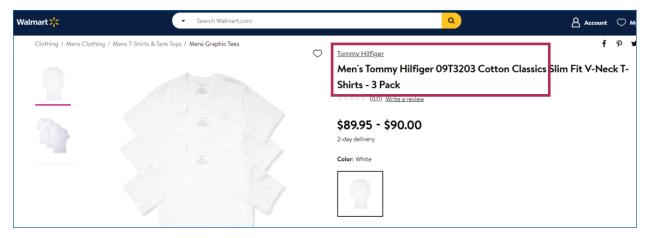
Shipment of fabric from New Lanka Trading to Hela Intimates



Shipment of 100% cotton garments from Hela Intimates to PVH Corp, including style 09T3203



PVH Corp brand Tommy Hilfiger t-shirt style 09T3203 as sold on Walmart.com⁷⁵



Note: while it is not possible for researchers to know that the particular cotton supplied by Huafu is used in the manufacturing of the Hilfiger crew neck t-shirts, these shipment records indicate the supply chain connections between the companies and the critical necessity of brands tracing their products several tiers beyond their Tier 1 suppliers.

Tung Mung Textile (via Indo Taichen Textile Industry)

Vietnamese manufacturer Tung Mung Textile is Indo Taichen's (see above) top buyer of cotton fabrics. The shipments from Indo Taichen only indicate "knitted fabrics" and do not specify fabric content. According to the (likely incomplete) available data, all but one of the cotton shipments received by Tung Mung Textile originated from Indo Taichen. Tung Mung Textile, in turn, ships finished garments made of cotton almost exclusively to **Adidas Canada**.

MAS Active (via Indo Taichen Textile Industry)

MAS Active receives just under 5% of all its cotton fabric imports from Indo Taichen (see above). This factory is part of MAS Holdings, the largest lingerie manufacturer in Southeast Asia. MAS Active focuses on sportswear. MAS Active has sent a considerable amount (over 9000 shipments over the past two years) of garments containing cotton to **Nike** locations around the world, including the United States. Other MAS Acrive importers include **Lululemon**, **Lacoste**, **Tommy Hilfiger**, **Calvin Klein**, **Ralph Lauren**, **PVH Corp**, **Patagonia**, and **Hanes**.

Thanh Cong Textile Garment (via New Lanka)

Based on available data, Vietnamese factory Thanh Cong Textile Garment receives over 95% of cotton fabrics from New Lanka Trading. Thanh Cong exports cotton garments to the brand **Eddie Bauer** in the United States and in Canada.

Manufacturers receiving 3% or less of their fabric from Huafu

While accessible shipping records provide information to show the following companies may receive only a nominal amount of fabric supplied by Huafu, international brands that are supplied by these companies should conduct due diligence to determine if their products are made with Huafu fabrics.

Win Textile

Huafu Macao supplies just under 2% of Indonesian Win Textile's cotton yarn. Win Textile then exports cotton fabrics. Customs data shows Win Textile shipments of fabrics rather than finished garments shipped to **Gap** and **Target** in various countries. The last shipment from Huafu seems to have been in December 2020, so this relationship may have been ceased.

Eins Vina (via Win Textile)

Win Textile sends cotton yarn to Vietnamese manufacturer **Eins Vina**. According to the available data, almost 100% of Eins Vina's cotton fabric imports came from Win Textile. Eins Vina's finished garments are sent to **Gap**, **PVH Corp**, and **Ascena Retail**.

Nobland Vietnam(via Win Textile)

Available data shows almost 89% of Nobland Vietnam's imported cotton fabrics originate from Win Textile. Nobland Vietnam exports cotton garments to **Levi's**, **Everlane**, and **Eileen Fisher**.

Seshin Vietnam (via Win Textile)

The available customs data for Seshin Vietnam only records shipments the company has received from Win Textile. Seshin Vietnam exports to **Gap** and to **American Eagle**.

TEXHONG TEXTILE GROUP

天虹紡織集團有限公司

Intermediary Manufacturers	Downstream Supply Chain Risk
Ambattur Fashion, Ameya Livingstyle	American Eagle, Ann Taylor, Anthropologie, Aritzia, Ascena Retail,
Indonesia Pt, Andalan Mandiri Busana,	Asics, ASOS, Banana Republic, Brooks Brothers, Calvin Klein,
Cipta Dwi Busana, Citra Abadi Sejati,	Carhartt, Carrefour, Chico's, Columbia, Duluth Trading, Eddie
Crevis Tex Jaya, Dasan Pan Pacific,	Bauer, Eileen Fisher, Everlane, Express, Forever21, Gap, H&M,
Eam Maliban Textiles, Eratex Djaja,	Hanes, Hugo Boss, J. Crew, J. Jill, Jack Wolfskin, JC Penney,
Gokaldas, Hansoll Indo Java, Hirdaramani	Kohl's, L.L. Bean, Lacoste, Lands' End, Levi's, Lilly Pulitzer, Lucky
International, Inti Sukses Garmindo, Jiale	Brand, Lululemon, Macy's, Madewell, Marks & Spencer, Michael
Indonesia, L T Karle & Co., MAS Active,	Kors, Nike, Old Navy, Patagonia, PVH Corp, Ralph Lauren, River
Morich Indo Fashion, Orit Trading Lanka,	Island, s. Oliver, Talbots, Target, Tesco, Tom Tailor, Tommy Hilfiger,
Smart Shirts, Tainan Enterprises	Topshop, Uniqlo, VF Corporation, Walmart

Texhong Textile Group (also known as Tianhong, or Rainbow Textile) is one of China's largest cotton textile manufacturers, founded in 1997 and headquartered in Shanghai. The company was listed on the Hong Kong stock exchange in 2004. The company's business scope includes manufacturing of yarns, fabrics, and garments, with a focus on the production of cotton yarn. Texhong has a number of production locations, both in China (including in the Uyghur Region) and abroad (Vietnam, Cambodia, Nicaragua, Turkey, Mexico). Texhong owns subsidiaries Winnitex, Shandong Lanyan, and Shanghai Hongrun, all of which supply international intermediary manufacturers. Winnitex ships from the same Hong Kong address that is listed for Texhong Knitting. Winnitex also ships from a second address, in Zheijang province.

Xinjiang Sourcing

Texhong's corporate reports confirm the existence of a subsidiary in the Uyghur Region, which the company designates as one of its "principal subsidiaries" as it "principally affected the results or assets of the Group." According to the company's most recent report, Xinjiang Tianhong/Texhong Foundation Textile Co., Ltd. (新疆天虹基業紡織有限公司) (now renamed Xinjiang Tianmian Foundation Textile Co., Ltd. or 新疆天棉基業紡織有限公司) is a spinning mill put into operation in 2016 and located in the Kuitun-Dushanzi Economic and Technological Development Zone in Yili Prefecture. At the time of its opening, it was predicted that after a planned expansion of production capacity to 1 million spindles, the factory would produce 200,000 tons of yarn annually with a sale income of over CNY 5 billion, and employ 5,000 people. The company has invested CNY 5 billion in its XUAR project.

Engagement in Labor Transfers

Texhong "actively responded to the national industry's call for assistance to Xinjiang" and is involved in government-led poverty alleviation schemes. ⁸² In 2018, Texhong's XUAR subsidiary was cited among companies that received a "textile industry poverty alleviation" award and were described as having "absorbed a large number of poor people through industrial poverty alleviation," indicating participation

in state-sponsored labor transfers.⁸³ The company's latest (2020) annual report states: "in response to state policy of One Belt One Road initiative, we proactively implemented industrial support in Xinjiang by recruiting ethnic minority employees in order to improve their living quality with job and education opportunities." According to Texhong's own reports, representatives of the company repeatedly visited a number of counties and towns in the XUAR (Nilka County, Künas County, Korghas County among others) to recruit "ethnic minority" employees, including "more than 1,000 employees from ethnic minorities such as Kazakh, Uygur and Hui." Recruitment took place "with the strong support of local governments" and "under the organization and concern of the local party committee." In 2020, it was reported that Texhong had created "2,824 new jobs for the resettlement of more than 1,800 surplus laborers and poor people in southern Xinjiang." While Texhong's Xinjiang production base is situated in Kuytun, Yili Prefecture, Kazakh Autonomous Region, in northern Xinjiang, it also employs laborers transferred from southern Xinjiang, referred to as "industrial workers." According to a cotton industry report, the raw cotton used by Xinjiang Tianmian is in part supplied by the 7th division of the XPCC; in fact, the report indicated that Texhong would "buy as much as the 7th division can supply."

Intermediary Manufacturer and Downstream Supply Chain

MAS Active

MAS Active is Texhong Knitting's biggest buyer. Just over 4% of MAS Active's incoming cotton fabric shipments were supplied by Texhong Hong Kong. MAS Active focuses on sportswear. The company has exported a considerable amount (over 9000 shipments over the past two years) of garments containing cotton to **Nike** locations around the world, including the United States. Other buyers include **Lululemon**, **Lacoste**, **Tommy Hilfiger**, **Calvin Klein**, **Ralph Lauren**, **PVH Corp**, **Patagonia**, and **Hanes**.

Crevis Tex Jaya

As Texhong's second biggest customer, Crevis Tex Jaya has received roughly 7% of its cotton fabrics from Texhong Knitting. This manufacturer supplies garments containing cotton to US brands **Chico's**, **Anthropologie**, **Macy's**, **Ann Taylor**, **Talbots**, and **Forever21**.

L T Karle & Co

Located in India, **L T Karle & Co** company has received roughly 60% of its cotton fabric supply from Texhong subsidiary Winnitex, its top supplier. L T Karle & Co is a supplier to the brand **Ann Taylor**.

Cipta Dwi Busana

Indonesian factory Cipta Dwi Busana has received 5% of its cotton fabrics from Texhong. Most shipments were recorded under HS codes applicable to non-cotton fabrics, despite the fact that the fabrics were composed of a mix of cotton, modal, and elastane. Cipta Dwi Busana ships garments containing cotton to **Target**, **Gap**, **Old Navy**, **Banana Republic**, and **Walmart**.

Hansoll Indo Java

Texhong is a relatively minor supplier of cotton fabrics to South Korean-owned Hansoll Indo Java, but it supplied just over 16% of Hansoll's 100% cotton fabrics until August 2020. Hansoll Indo Java sends cotton garments to **JC Penney, Walmart**, and **Kohl's**.

Eratex Djaja

Almost 22% of Eratex Djaja's received cotton fabrics were shipped by Texhong subsidiary Winnitex, making it the manufacturer's the top supplier (based on available shipping records). Cotton garments are exported by Eratex Djaja to **Ann Taylor**, **Ralph Lauren**, **Brooks Brothers**, **American Eagle**, and **Duluth Trading**.

Gokaldas

Gokaldas is an Indian manufacturer that ships to the following brands: **H&M**, **Old Navy**, **Gap**, **Carhartt**, **JC Penney**, **Columbia**, **Banana Republic**, **Carrefour**, and **Walmart**. Texhong subsidiary Winnitex is its top supplier of cotton fabrics, accounting for around 20% of received shipments. As for 100% cotton fabrics, Winnitex's share of shipments reaches 30%. Most of Winnitex's 100% cotton shipments indicate a fabric weight of 410 gr/sqm, a heavy weight fabric that is often used for jeans and rigid canvas items. Winnitex is Gokaldas' sole supplier of this specific cotton fabric at this particular fabric weight. This weight matches the description for 100% cotton jackets sent to the brand Carhartt's Netherlands branch.

Shipment of 100% cotton 410 gr/sqare meter fabric from Winnitex to Gokaldas

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2021- 03-07	Gokaldas Exp. 99, Residency Rd, Shanthala Nagar, Ashok Nagar	Winnitex Ltd. Cable T V Tower, 9	China	India	5209.31.90	100%COTTON WOVEN FABRIC W:65.5"" GSM410 (5034.6 YARDS) "

Shipment of 100% cotton (410 gr/sqm) men's lined jackets from Gokaldas to Carhartt

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2021- 04-22	Carhartt B.V Emea	Gokaldas Exp.	India	Netherlands	6203.32.00	GENTS JACKET WITH LINING MADE OF 100% COTTON
	e company profile	99, Residency Rd, Shanthala Nagar, Ashok				WOVEN FABRIC GSM 410

Ambattur Fashion

Ambattur Fashion is anIndian manufacturer. Texhong subsidiary Winnitex is its top supplier of cotton fabrics, accounting for around 13% of total shipments. All cotton fabric shipments received from Winnitex specify a fabric composition of 98% cotton/2% spandex. Over 46% of shipments containing this fabric were supplied by Winnitex. Buyers of Ambattur finished cotton garments include **Old Navy, Ann Taylor, Talbots, Banana Republic, Gap, J. Jill,** and **Marks & Spencer**.

Shipment of 99% cotton/2% spandex stretch fabric from Winnitex to Ambattur Fashion



Shipment of 99% cotton/2% spandex men's shirts from Ambattur Fashion to Old Navy

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2021- 04-28	Old Navy Llc United States Company Profile	Ambattur Fashion India Private Ltd. 80E, 2-B-30, Sai Nagar, Ambattur	India	United States	6205.20.90	MILLMADE 98% COTTON 2% SPANDEX WOVEN MENS SHIRTS- WITHOUT HANGER

Andalan Mandiri Busana

Texhong subsidiary Winnitex is the biggest supplier of cotton fabrics to Indonesian manufacturer Andalan Mandiri Busana (AMB), accounting for around 17% of shipments. This Indonesian manufacturer supplies cotton garments to the brands **Gap**, **Ann Taylor**, **Talbots**, **J. Jill**, and **J. Crew**.

According to available records, Winnitex is AMB's top supplier of 97% cotton/3% elastane woven fabric, accounting for over 40% of recorded shipments of that particular fabric. Most AMB exports containing garments composed of this fabric were shipped to Ann Taylor or to J. Crew. Below is an image of a garment made with that particular fabric composition that is sold by J. Crew, matching the style number specified in the Winnitex shipment bill of lading.

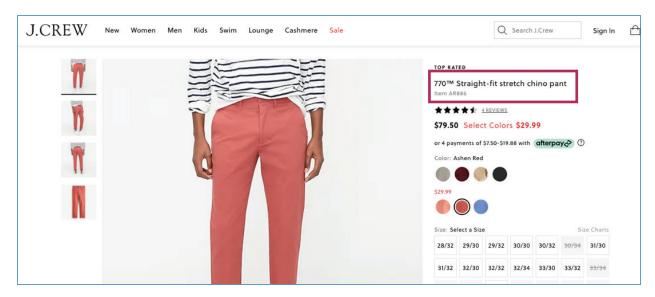
Shipment of 97% cotton/3% elastane fabric from Texhong subsidiary Winnitex to Andalan Mandiri Busana

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped
2021- 03-16	Andalan Mandiri Busana	Winnitex Ltd. Cable T V	Hong Kong	Indonesia	5209.39	97% COTTON 3% ELASTANE STRETCH DYED
	JI. Raya Solo Semarang, Tegalsari,	Tower, 9 Hoi Shing Rd, Chai Wan Kok, Hong				TWILL WOVEN FABRIC
	Kertonatan, Kec.	Kong				

Shipment of 97% cotton/3% elastane style men's pants (AR886-3) from Andalan Mandiri Busana to J. Crew

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped	Weight (KG)
							89,372
2021- 03-31	J. Crew Operating Corporation 225 Elberty St. New York, NY 10080, USA Company profile	Andalan Mandiri Busana Ji. Haya Sulo Semarang, Tegalsari, Kertonatan, Kec. Kartasura, Kabupaten	Indonesia	United States	6203.42 Trousers, bib and brace overalls, breeches and shorts; men's or boys', of	MENS 97% COTTON 3% ELASTANE PANTS WOVENPO 1741300STYLE AR886-3	712.38

Product sold by J Crew and supplied by Andalan Mandiri Busana that includes the same style number as in shipping records⁸⁸



Tainan Enterprises

Tainan Enterprises is an Indonesian manufacturer shipping cotton garments to the brands **Gap**, **Ann Taylor**, **Talbots**, **J. Crew**, **Eileen Fisher**, **J. Jill**, **L.L. Bean**, **Ascena Retail**, **Madewell**, and **Express**. This manufacturer receives around 5% of its total cotton fabric supply from Texhong subsidiary Winnitex.

Citra Abadi Sejati

Texhong subsidiary Winnitex is Indonesian manufacturer Citra Abadi Sejati's third biggest supplier of cotton fabrics. The company ships garments containing cotton mainly to brands **Ann Taylor**, **J. Jill**, **L.L. Bean**, **Ascena Retail**and **Hugo Boss**.

Smart Shirts

Texhong subsidiary Winnitex has provided around 8% of cotton fabric shipments received by Sri Lankan manufacturer Smart Shirts. Smart Shirts is a supplier of cotton garments to **L.L. Bean, Lacoste,** and **Ralph Lauren**. This manufacturer produces and sends their products from several countries: Vietnam, Cambodia, Sri Lanka, China. Only L.L. Bean receives shipments exclusively from their Sri Lanka location.

Inti Sukses Garmindo (ISG)

Texhong subsidiary Winnitex is the second biggest supplier of cotton fabric to Indonesian factory Inti Sukses Garmindo (ISG), accounting for around 5% of shipments. ISG ships cotton garments to **Ralph Lauren**, **s. Oliver**, and **Tommy Hilfiger**.

Winnitex has supplied most (75%) of the shipments to ISG that consist of a specific 61% cotton/29% viscose/8% polyester/2% elastane stretch fabric composition that has been used in finished garments exported to **Ralph Lauren** distribution facilities in several countries. Winnitex is the second biggest supplier of cotton fabric to Indonesian factory Inti Sukses Garmindo, accounting for around 5% of shipments. We were able to find a pair of pants that matched the description of this shipment, but not in Europe.

Shipment of 61% cotton/29% viscose/8% polyester/2% elastane stretch fabric from Winnitex to Inti Sukses Garmindo

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped	Weight (KG)
							16,170
2021- 03-03	Pt Inti Sukses Garmindo Handeganting, Bergas, Semarang, Central Java, Indonesia	Winnitex Ltd. UNIT 36013605 CABLE TV TOWER 9 HOI SHING ROAD TSUEN WAN	China	Indonesia	5211.32	61 PCT COTTON 29 PCT VISCOSE 8 PCT POLYESTER 2 PCT ELASTANE DYED SLUB STRECTH TWILL WOVEN FABRIC CONTRACT NO : SC112861-06 D6967G/55 POLO	3162.0

Shipment of 61% cotton/29% viscose/8% polyester/2% elastane garments from Inti Sukses Garmindo to Ralph Lauren Italy

Date	Consignee	Shipper	Shipment Origin	Shipment Destination	HS Code	Goods Shipped	Weight (KG)
							5,149
2021- 03-31	Ralph Lauren Europe Sarl Via Aldo Moro 27 40033 Casalecchio di Reno,	Pt. Intisukses Garmindo Handugunting, Bergas, Semarang, Central Java, Indonesia	Indonesia	Italy	6204.62	LADIES 61% COTTON 29% VISCOSE 8% POLYEST2% ELASTANE\ WOVEN SKINNYPO# 4701246502	1051.34

Eam Maliban Textiles

Eam Malibam Textiles sources fabric from Texhong subsidiary Winnitex. Eam Maliban sends cotton garments to Gap, Banana Republic, Tommy Hilfiger, Eddie Bauer, Kohl's, and PVH Corp.

Only a little more than 2% of Eam Maliban Textiles' cotton fabrics have been supplied by Winnitex; however, Winnitex is Eam Maliban Textiles' only recorded supplier of a fabric composed of 55% cotton/39% polyester/6% elastane. Garments produced by Eam Maliban with this fabric—all men's shorts and trousers—were sent to **Gap** and **Banana Republic**.

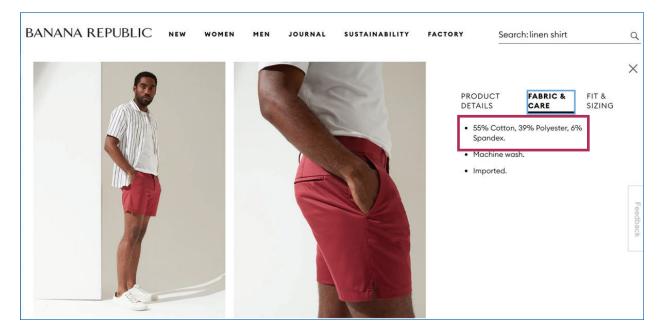
Shipment of 55% cotton/39% polyester/ 6% elastane fabric from Winnitex to Eam Maliban Textiles



Shipment of 55% cotton/39% polyester/6% elastane men's shorts from Eam Maliban Textiles to Banana Republic



55% cotton/39% polyester/6% elastane men's shorts sold by Banana Republic89



Morich Indo Fashion

Texhong subsidiary Winnitex is a minor supplier of cotton fabrics to manufacturer Morich Indo Fashion located in Indonesia. Morich Indo Fashion supplies clothing to the German brand **s. Oliver.**

Manufacturers receiving 3% or less of their fabric from Texhong and its subsidiaries

While accessible shipping records provide information to show the following companies may receive only a nominal amount of fabric supplied by Texhong, international brands that are supplied by these companies should conduct due diligence to determine if their products are made with Texhong fabrics.

Hirdaramani International

Winnitex is a relatively minor supplier of cotton fabrics (under 2% of total received shipments) to Sri Lankan manufacturer Hirdaramani International, but it nonetheless exports many shipments to this company. Shandong Lanyan Textiles, a subsidiary of Texhong focused on the production of denim, also ships cotton fabrics to Hirdaramani in Sri Lanka, although it is only a relatively minor supplier to this manufacturer.

Hirdaramani is a supplier of clothing to a number of brands: Levi's, H&M, Tesco, Marks & Spencer, Patagonia, Lilly Pulitzer, Lacoste, Hugo Boss, Michael Kors, Everlane, Lands' End, Asics, Lucky Brand, PVH Corp, Tommy Hilfiger, and River Island.

Patagonia has received 585 shipments of cotton clothes from Hirdaramani over the past two years. Looking at all entities under Patagonia worldwide, 39% (by number of shipments) of all the cotton garments the brand has received were supplied by Hirdaramani, based on available shipping records.

Orit Trading Lanka

Winnitex is a minor supplier of cotton fabric to manufacturer Orit Trading Lanka, accounting for roughly 2% of received cotton fabric shipments. Orit Trading Lanka sends cotton garments to **Levi's**, **Lucky Brand**, **Ralph Lauren**, **ASOS**, **Aritzia**, and British apparel company **Arcadia** (the shipment descriptions specify its brand **Topshop**).

Jiale Indonesia

Texhong has supplied around 2% of the cotton fabric shipments received by manufacturer Jiale Indonesia, which in turn supplies garments to **Uniqlo**.

The data for Jiale Indonesia also shows three shipments of cotton yarn received in July and August 2019 directly from Xinjiang Texhong Foundation Textile, though the incomplete address refers to Jiangsu province. No other shipments from Texhong's Xinjiang subsidiary have been recorded since. Shipments from Texhong Knitting to Jiale Indonesia started much later, in October 2020.

Ameya Livingstyle

Shanghai Hongrun Textile is another entity owned by Texhong according to its corporate reports. The data available for this subsidiary indicate a small number of shipments to Indonesian manufacturer Ameya Livingstyle. Ameya Livingstyle ships cotton garments to German brands **Tom Tailor**, **Jack Wolfskin**, and **s. Oliver**, as well as to **H&M** and **VF Corporation** (a US apparel company that owns brands such as Timberland, The North Face, Vans, Kipling, and JanSport). 90

Dasan Pan Pacific Indonesia

Texhong is a minor supplier (just over 1% of received cotton fabrics) to manufacturer Dasan Pan Pacific Indonesia, which ships cotton garments to **Target**, **Old Navy**, and **Gap**.

WEIQIAO TEXTILE CO. LTD.

山东魏桥纺织股份有限公司

Intermediary 1	Intermediary 2	Downstream Supply Chain Risk
Lucky Textile Mills, New Lanka Trading, Win Textile, Yunus Textile Mills	Brandix Apparel, Hela Intimates, MAS Intimates, Thanh Cong Textile Garments	Alsico, Amazon, Bed Bath & Beyond, Carrefour, E&E Co., Eddie Bauer, Encompass Group, Exchange, Gap, Home Depot, Ikea, J. Franco & Sons, JC Penney, Jo Ann Stores, Kmart, Macy's, Marks & Spencer, Medline Scrubs, Michael Kors, My Pillow.com, Old Navy, Primark, PVH Corp, Royale Linen, SAXX Underwear, Sears, Target, Third Love, Thomaston Mills, Uniqlo, Walmart, Wayfair

Weiqiao Textile Co., Ltd. (Shandong Weiqiao Pioneering Group) is a cotton textile enterprise engaged in the production and distribution of cotton yarn and fabrics. The company has several production bases in Shandong Province, in four main areas: Weiqiao, Binzhou, Weihai, and Zouping.⁹¹ The company's 2019 corporate report lists ten subsidiaries spread over these areas.⁹² As of 2021, the company's output was reported to be around 400,000 tons of cotton yarn, 900 million meters of grey cloth (a type of cotton fabric), and more than 70 million meters of denim.⁹³ Weiqiao Textile's market has reportedly expanded to over 70 countries across Europe, America, and Southeast Asia, with over CNY 10 billion in annual sales.⁹⁴ Shandong Weiqiao Jiajia Home Textile is a subsidiary of Shandong Weiqiao.⁹⁵ This entity ships cotton bedding to the United Statees. Most shipments are addressed to the company's U.S. branch, Weiqiao America. Other shipments are sent to companies specializing in hotel bedsheets.

XUAR Sourcing

A number of sources indicate that Weigiao Textile, along with other Shandong cotton textile companies, sources the majority of its raw cotton material from the Uyghur Region. In April 2021, vice president of Shandong Textile Association Xu Guangning discussed the current state of Shandong's cotton textile industry. Xu estimates the province's yearly cotton demand at 3 to 4 million tons, which he claimed amounts to about 40% of China's total cotton demand. About half of all textiles produced in Shandong factories are made of cotton. Pointing out that Xinjiang cotton now represents at least 85% of China's total raw cotton output, Xu confirms that Shandong uses a large amount of Xinjiang cotton. In particular, he lists Weigiao Textile as one of the Shandong companies with the largest demand for Xinjiang cotton.96 The company's 2019 corporate report indicates that Shandong province's average annual cotton consumption amounts to around 4.5 million tons and that there is a significant gap between supply and demand for cotton in the province, confirming that companies need to obtain their raw material from other regions. The report discusses the price of Xinjiang cotton, its past and predicted fluctuations, and effects on the company, suggesting Weigiao significantly relies on Xinjiang cotton.⁹⁷ The report specifies the company also imports foreign cotton to meet its needs for production, but that the company was increasingly buying domestic cotton.98 A 2015 interview with Weigiao's chairman revealed that at the time, Weigiao was already sourcing one third of its cotton

from the Uyghur Region, "in response to the country's call to promote the development of the central and western regions." ⁹⁹

Engagement in Labor Transfers

We located no evidence that Weiqiao Textile is directly employing state-sponsored labor programs targeting XUAR citizens. However, it is apparent that the company benefits from and relies on Xinjiang cotton.

Intermediary Manufacturer and Downstream Supply Chain

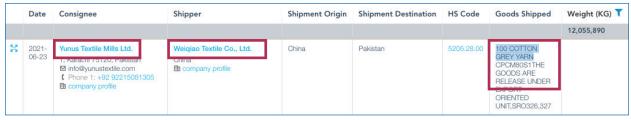
Yunus Textile Mills

Manufacturer Yunus Textile Mills, located in Pakistan, is Weiqiao Textile's top buyer of cotton semi-finished goods. Weiqiao has mostly supplied yarn, but also fabric to Yunus. All subsidiaries combined, Weiqiao Textile accounts for roughly 48% of cotton yarn and fabrics received by Yunus Textile based on the available data (see above for customers).

Weiqiao is Yunus Textile's top supplier of cotton semi-finished goods. Yunus Textile produces bedding and other home textiles, and supplies **Target**, **Walmart**, **Ikea**, **Macy's**, **JC Penney**, **Jo Ann Stores**, and **Carrefour**, as well as bedding retailers **E&E Co.**, **J. Franco & Sons**, and **Thomaston Mills**. Yunus owns a US subsidiary called Royale Linen, which sells cotton sheets to **Macy's**, **Kmart**, **Walmart**, **Bed Bath & Beyond**, **Sears**, **Amazon**, **Wayfair**, and **Home Depot**. They also supplybedding to **Exchange**, an e-commerce site for American military abroad. Yunus spins its own yarn and makes its own fabric as well, but its connection to Weiqiao presents a high risk of Xinjiang cotton in their products and potential difficulty differentiating between yarn sourcing. The Yunus Brothers Group is the parent of Yunus and Lucky Textile Mills (below).¹⁰⁰

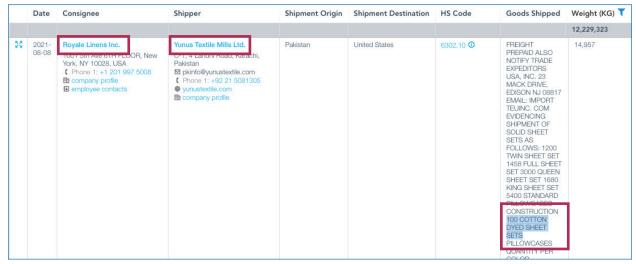
Weiqiao shipped six containers of 100% cotton grey yarn to Yunus Textiles in Pakistan on June 23, 2021. In early August, Yunus shipped 100% cotton sheets to its U.S. subsidiary Royale Linens. Royale Linens sells 100% cotton sheets to a number of US retailers, including online retailer Wayfair. Wayfair advertises Yunus as using BCI certified cotton. It is possible that Yunus provides Wayfair with specific BCI certified cotton sheet sets for which the cotton is not sourced from Xinjiang. However, it would be incumbent upon companies receiving sheets from Royale Linens to investigate supply chains upstream of Yunus.

Shipment of 100% cotton yarn from Weigiao Textile to Yunus Textile.



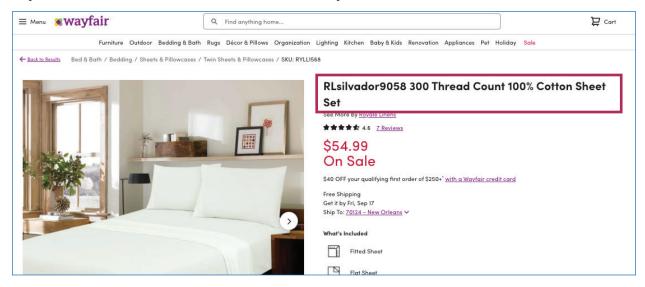
Source: Panjiva

Shipment of 100% cotton sheet sets from Yunus Textile Mills to Yunus's U.S. subsidiary Royale Linens.

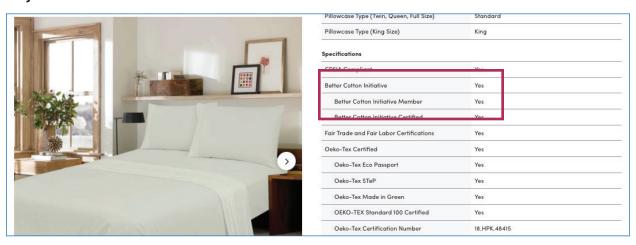


Source: Panjiva

Royale Linens 100% cotton sheet sets for sale on Wayfair's website. 101



Wayfair advertises Yunus as a BCI Initiative member and the sheets as BCI certified



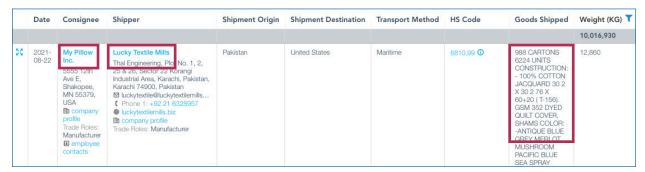
Lucky Textile Mills

As the top supplier of cotton semi-finished goods to Pakistani manufacturer Lucky Textile Mills (accounting for almost 45% of shipments), Weiqiao Textile has supplied mostly cotton yarn as well as some cotton fabrics.

Lucky Textile ships home textiles and items like tablecloths and aprons containing cotton to **Walmart**, **Jo Ann Stores**, **Ikea**. They also supply cotton-blend bedding and medical scrubs to **Encompass Group**, a supplier to U.S. hospitals, as well as cotton-blend medical scrubs suppliers **Alsico** in the United Kingdom and **Medline Scrubs** in the US.

Lucky Textile Mills also supplies bedding to **My Pillow.com**, which claims on its website that all of its fabric is made of 100% Giza cotton.¹⁰² Lucky Textile may be supplying My Pillow with 100% Giza cotton bedding, but there is some risk of Xinjiang (or other) cotton in these shipments because of Lucky's sourcing from Weigiao.

Shipments of 100% cotton sheet sets from Lucky Textile Mills to My Pillow, Inc.



Win Textile

Weiqiao is a minor supplier to Indonesian manufacturer **Win Textile**. Win Textile then exports cotton fabrics. Customs data shows Win Textile shipments of fabrics shipped to **Gap** and **Target** in various countries.

New Lanka Trading

At least 5% of yarn received by New Lanka Trading company was supplied by Weiqiao. Weiqiao's main Shandong facility, Weihai Weiqiao, and Binzhou Weiqiao all supply cotton yarn to New Lanka Trading. New Lanka is also supplied by Huafu, significantly increasing the risk of Xinjiang cotton from this supplier.

MAS Intimates (via New Lanka Trading)

New Lanka Trading (see above) is the top supplier of cotton fabrics to MAS Intimates' Bangladesh location, accounting for over 53% of imported shipments. MAS Intimates' production facilities are located in Kenya, Bangladesh, India, Jordan, and Sri Lanka. The Bangladesh location ships cotton garments to **PVH Corp**.

MAS Intimates also sells cotton-based products to **Marks & Spencer**, **Primark**, **Third Love**, and **SAXX Underwear**. One Sri Lanka facility almost exclusively supplies **Gap Canada** and **Old Navy Canada** including their cotton-based products.

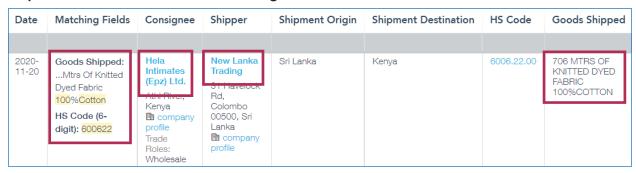
Brandix Apparel (via New Lanka)

New Lanka Trading (see above) has provided almost 50% of cotton fabric shipments received by **Brandix Apparel**'s production location in India. Brandix Apparel's India facility exports cotton garments to **Uniqlo**.

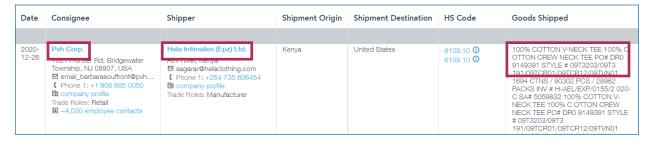
Hela Intimates (via New Lanka)

Just over 22% of **Hela Intimates'** recorded cotton fabric shipments came from New Lanka Trading (see above). Based on the style numbers indicated in shipping bills of lading, it is possible to pinpoint a shipment of Tommy Hilfiger basic men's cotton t-shirts being sent from Hela Intimates to PVH Corp, which are then sold on Walmart's website. Hela Intimates sends underwear and other types of garments containing cotton to **PVH Corp** and to **Michael Kors**.

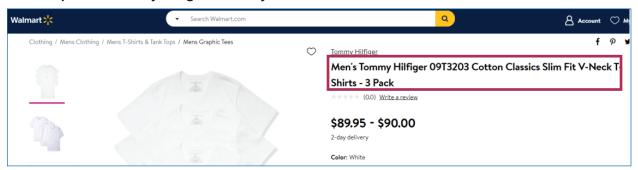
Shipment of fabric from New Lanka Trading to Hela Intimates



Shipment of 100% cotton garments from Hela Intimates to PVH Corp, including style 09T3203



PVH Corp brand Tommy Hilfiger t-shirt style 09T3203 as sold on Walmart.com¹⁰³



Note: while it is not possible for researchers to know that the particular cotton supplied by Weiqiao is used in the manufacturing of the Hilfiger crew neck t-shirts, these shipment records indicate the supply chain connections between the companies and the critical necessity of brands tracing their products several tiers beyond their Tier 1 suppliers.

Thanh Cong Textile Garment (via New Lanka)

Based on available data, Vietnamese factory Thanh Cong Textile Garment receives over 95% of cotton fabrics from New Lanka Trading. Thanh Cong exports cotton garments to the brand **Eddie Bauer** in the US and in Canada.

INTERMEDIARY MANUFACTURERS LINKED TO XINJIANG COTTON (2019-2021)

This table illustrates the relationship between Chinese manufacturers that have a history of sourcing Xinjiang cotton, their intermediaries, and the international apparel companies that buy from those intermediaries. This table indicates intermediary suppliers that have increased risk of exposure to Xinjiang cotton through their sourcing from the five companies researched in this report. The information presented here is drawn from international customs records from the last two years. This list is meant to be illustrative of the international apparel supply chains, the potential presence of Xinjiang cotton, and the feasibility of tracing such supply chains back to high-risk Chinese manufacturers. This list is not exhaustive, nor is it a certain determination that the international apparel brands are necessarily sourcing products made of Xinjiang cotton.

International Intermediary Manufacturer	Location	Confirmed Chinese Suppliers Linked to Xinjiang cotton (including their subsidiaries)	International Cotton Garment Brands Sourcing from International Intermediary
Aditya Birla	India	Luthai	Aigle, Cinq Huitiemes, Lacoste, Marc O'Polo, Superdry
Ambattur Fashion	India	Texhong (via sub. Winnitex)	Old Navy, Ann Taylor, Talbots, Banana Republic, Gap, J. Jill, Marks & Spencer
Ameya Livingstyle Indonesia Pt	Indonesia	Lianfa, Texhong (via sub. Shanghai Hongrun)	s. Oliver, Tom Tailor, Jack Wolfskin, H&M, VF Corporation
Andalan Mandiri Busana	Indonesia	Texhong (via sub. Winnitex)	Gap, Ann Taylor, Talbots, J. Crew, J. Jill
Anggun Kreasi Garmen	Indonesia	Lianfa	s. Oliver, Tom Tailor, Tommy Hilfiger, PVH Corp
Aquarelle	India	Luthai, Lianfa	PVH Corp, Bestseller, Levi Strauss, Pepe Jeans, Target, Tommy Hilfiger, Lee Wrangler
Brandix Apparel	India, Sri Lanka	Huafu (via Teejay Lanka, Hayley Fabric, and New Lanka Trading)	Gap, PVH Corp, Uniqlo, Calvin Klein, Aritzia, Ascena Retail
Chenfeng Jiangsu Apparel	China	Luthai	Uniqlo, Patagonia, Theory, Outerknown, It's Greek to Me
Cipta Dwi Busana	Indonesia	Texhong	Target, Gap, Old Navy, Banana Republic, Walmart
Citra Abadi Sejati	Indonesia	Texhong (via sub. Winnitex)	Ann Taylor, J. Jill, L.L. Bean, Ascena Retail, Hugo Boss
CrevisTex Jaya	Indonesia	Texhong	Chico's, Anthropologie, Macy's, Ann Taylor, Talbots, Forever21
Daenong Global	Indonesia	Luthai	Uniqlo, Hanes, Kmart, Daenong Korea
Dasan Pan Pacific	Indonesia	Texhong	Target, Old Navy, Gap

Eam Maliban Textiles	Sri Lanka	Lianfa, Texhong (via sub.	Banana Republic, Gap, Kohl's, Tommy
		Winnitex)	Hilfiger, Eddie Bauer, PVH Corp
Eins Vina	Vietnam	Huafu (via Win Textile)	Gap, PVH Corp, Eileen Fisher
Eratex Djaja	Indonesia	Lianfa, Texhong (via sub. Winnitex)	Ann Taylor, Ralph Lauren, Brooks Brothers, American Eagle, Duluth Trading
Gokaldas	India	Texhong (via sub. Winnitex)	H&M, Old Navy, Gap, Carhartt, JC Penney, Columbia, Banana Republic, Carrefour, Walmart
Hansoll Indo Java	Indonesia	Texhong	JC Penney, Walmart, Kohl's
Hayleys Fabrics	Sri Lanka	Huafu	international intermediaries
Hela Intimates	Kenya	Huafu (via Teejay Lanka and New Lanka Trading)	PVH Corp, Michael Kors
Hirdaramani International	Sri Lanka	Texhong (via subs. Winnitex and Shandong Lanyan)	Levi's, H&M, Tesco, Marks & Spencer, Patagonia, Lilly Pulitzer, Lacoste, Hugo Boss, Michael Kors, Everlane, Lands' End, Asics, Lucky Brand, PVH Corp, Tommy Hilfiger, River Island
Itaca Textile	Ethiopia	Huafu (via Teejay Lanka)	Calzedonia
Indo Taichen Textile Industry	Vietnam	Huafu	international intermediaries
Inti Sukses Garmindo	Indonesia	Lianfa, Texhong (via sub. Winnitex)	Ralph Lauren, s. Oliver, Tommy Hilfiger
Jiale Indonesia	Indonesia	Texhong	Uniqlo
Laguna Clothing	India	Luthai	Bestseller, Tommy Hilfiger, Express, Reiss, Ralph Lauren, Marks & Spencer, PVH Corp, Carrefour
L T Karle & Co	India	Texhong (via sub. Winnitex)	Ann Taylor
Lucky Textile Mills	Pakistan	Weiqiao	Alsico, Walmart, Jo Ann Stores, Medline Scrubs, Ikea, Gap, Target, Encompass Group, My Pillow
MAS Active	Sri Lanka	Huafu (via Indo Taichen), Texhong	Nike, Lacoste, Lululemon, Ralph Lauren, Hanes, Tommy Hilfiger, PVH Corp, Gap, Patagonia
MAS Intimates	Sri Lanka, Bangladesh, Kenya, India, Jordan	Huafu (via South Asia Textile Sri Lanka, Teejay Lanka, Hayley's Fabric Sri Lanka, and New Lanka)	PVH Corp, Marks & Spencer, Primark, SAXX Underwear, Third Love, Gap, Old Navy
Masterindo Jaya Abadi	Indonesia	Luthai, Lianfa	G-III Apparel, s. Oliver
Metro Garmin	Indonesia	Luthai, Lianfa	Olymp, Lf Men's Group, Lands' End, Costco, Southern Tide
Morich Indo Fashion	Indonesia	Texhong (via sub. Winnitex)	s. Oliver

New Lanka Trading	Sri Lanka	Huafu, Weiqiao	international intermediaries
Nobland Vietnam	Vietnam	Huafu (via Win Textile)	Eileen Fisher, Everlane, Levi's
Odem Internacional	Mexico	Luthai	international intermediaries, Frank & Eileen
Orit Trading Lanka	Sri Lanka	Texhong (via sub. Winnitex)	Levi's, Lucky Brand, Ralph Lauren, ASOS, Aritzia, Topshop
Pasifik Abadi Garmindo	Indonesia	Lianfa	Ralph Lauren
Samwon Busana	Indonesia	Luthai, Lianfa	Macy's, Kohl's
Seshin Vietnam	Vietnam	Huafu (via Win Textile)	Gap, American Eagle
Shahi Export	India	Luthai	H&M, Decathlon, Old Navy, Gap, PVH Corp, Walmart, Tommy Hilfiger, Kohl's, Marks& Spencer, Levi's, Uniqlo, JC Penney, Eddie Bauer, G-III Apparel, C&A, Calvin Klein, Target, Banana Republic
Smart Shirts	Sri Lanka	Lianfa, Texhong (via sub. Winnitex)	L.L. Bean, Ralph Lauren, Lacoste
South Asia Textile Industries	Sri Lanka	Huafu	international intermediaries
Starpia	Indonesia	Luthai	Uniqlo
Tainan Enterprises	Indonesia	Texhong (via sub. Winnitex)	Gap, Ann Taylor, Talbots, J. Crew, Eileen Fisher, J. Jill, L.L. Bean, Ascena Retail, Madewell, Express
Teejay Lanka	Indonesia	Huafu	Calzedonia, international intermediaries
Thanh Cong Textile Garment	Vietnam	Huafu (via New Lanka)	Eddie Bauer
Tung Mung Textile	Vietnam	Huafu (via Indo Taichen Vietnam)	Adidas Canada
Ungaran Sari Garments	Indonesia	Luthai, Lianfa	Eileen Fisher, Lucky Brand, PVH Corp, Ann Taylor, Lilly Pulitzer, J. Crew, Tommy Hilfiger, Calvin Klein, Macy's, L.L. Bean, Kohl's, Brooks Brothers, Lululemon, Madewell, Ralph Lauren, Walmart, Perry Ellis, G-III Apparel, Talbots, J. Jill, Vineyard Vines, Men's Wearhouse, Jos A Banks
Win Textile	Indonesia	Huafu, Weiqiao	Gap, Target, & international intermediaries
Wintai Garment	Indonesia	Huafu	C&A, Carrefour
Yunus Textile Mills (& subsidiary Royale Linens)	Pakistan	Weiqiao	Amazon, Target, Walmart, Ikea, Macy's, JC Penney, Carrefour, Jo Ann Stores, E&E Co., Thomaston Mills, Exchange, Kmart, Bed, Bath & Beyond, Sears, J. Franco & Sons, Wayfair, Home Depot ¹⁰⁴
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