

ANNEX A

International Corporate Supply Chain Risk of XUAR Labor Transfers

To the extent it is possible, this table identifies potential supply chain connections between the Uyghur Region-based companies discussed in this report and international distributors. The left-hand column names the Uyghur Region-based entity. The "Intermediary Manufacturer" column lists any company that had sourced PVC or caustic soda from the Uyghur Region-based companies for manufacturing and export of flooring, pipes, or other products in the last two years. The "Destination Corporation" column lists companies that have purchased products from the intermediaries in the last two years, presenting a risk of being made with Uyghur Region-made PVC or caustic soda. (Note: Shipping records do not reveal all products manufactured or exported by the intermediary manufacturers. When the downstream corporations columns are blank this signifies that we were unable to identify exports from those intermediaries.)

The intermediaries and destination corporations listed here may source the same PVC or caustic soda products from several different entities. Therefore, this table indicates risk of Uyghur Region made goods (and thereby exposure to forced labor), not certainty. Full supply chain due diligence would be required to ensure that all goods identified in this table are free of Uyghur forced labor. Furthermore, this is a point-in-time analysis, and companies may shift their supply chains. This information is provided so that procurers and customers can identify and investigate risk.

Because Xinjiang Zhongtai manufactures all of its PVC and caustic soda in the Uyghur Region, the company's products should be understood to originate in the Uyghur Region, even if they are being shipped via Zhongtai's Hong Kong subsidiary. Xinjiang Zhongtai is also the second biggest supplier to Zhejiang Tianzhen, significantly raising that company's risk in its entire downstream PVC flooring supply chain.

Qingdao Haiwan manufactures more than a quarter of its PVC in its XUAR-based facility. This puts all Haiwan exports at risk of Uyghur labor transfers/Uyghur Region-made products. Again, only full supply chain tracing would ensure that all goods identified here are free of XUAR inputs and Uyghur forced labor.

Annex B -- Examples of Jufeng Flooring Shipped to International Brands provides a more detailed set of examples, including select images and model numbers) of PVC-based flooring at high risk of being manufactured with Uyghur-Region-produced PVC.

All supply chain information that follows comes from customs data accessed via Panjiva Market Intelligence and Descartes DataMyne. Zhongtai International Development's supply chain relationship to Zhejiang Tianzhen was identified in documents related to Zhejiang Tianzhen's IPO, as discussed in the body of the report.

PVC AND CAUSTIC SODA MANUFACTURED IN UYGHUR REGION		INTERMEDIARY MANUFACTURERS PRODUCE BUILDING MATERIALS AND OTHER PRODUCTS FROM UYGHUR REGION INPUTS (INCLUDES SOME SHIPPING COMPANIES)		CORPORATIONS SELLING PVC-BASED PRODUCTS MADE BY INTERMEDIARIES ABROAD		
Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
Xinjiang Zhongtai Import and Export	PVC	Chenfeng New Materials Vietnam	Vietnam	PVC Flooring	Jufeng New Materials Vietnam	Vietnam
		Jufeng New Materials Vietnam	Vietnam	PVC Film	Chenfeng New Materials Vietnam	Vietnam
				PVC Flooring	Home Legend	US
					Shaw Industries Plant 52	US
					Armstrong Flooring	US
					Mohawk Carpet Distrubution Inc	US
					Congoleum Acquisitions LLC	US
					FD Sales Co LLC	US
					Flooret LLC	US
					Hf Design	US
					LI Flooring Services	US
					Mannington Mills	US
					Adore Floors Ltd	Ireland
					Happy Feet International	US
					International Inc	US
					Lumber Liquidators Services LLC (LI Flooring Holdings)	US
					Soho Studio	US
					LL Flooring Services*	US
					Everstep Flooring	US
	Caustic Soda	Biota Laut Ganggang	Indonesia	Carrageenan, Seaweed Flour	Gum Products International	Canada

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
				Carrageenan	Ingredients Solutions/Tilley Chemical Company	US
					Barcelonesa De Drogas Y Productos Quimicos S.A	Spain
					Colony Gums	US
					Eurogum A S	Denmark
					Foodtech Group	Hong Kong
					Gel Systems	England
					Gujarat Enterprise	India
					Food Ingredients LLC	Russia
					Miavit Gmb H	Germany
					Nestle Hungaria Kft	Hungaria
					Neupert Ingredients GmbH	Germany
					Neutrapet Systems Deutschland GmbH	Germany
					Procesadora De Alimentos M&A Sa De	Mexico
					Przedsiębiorstwo Produkcyjnohandlowe Promar Sp Z	Poland
					Ravenswood Australia	Australia
					Shanghai Brilliant Gum	China
					Sk Food Additives Gmb H Kg	Germany
					Sli Chemicals Gmb H	Germany
					Soyuzopttorg Region	Russia

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
					Zhejiang Top Hydrocolloids	China
	PVC	JPO Polychem Private Ltd	India			
	Caustic Soda	Arvin International Marketing Inc	Philippines			
		PT Far East Conmix Indonesia	Indonesia			
	PVC	PT Golden Roof Polymer	Indonesia			
	PVC	PT Halim Sejahtera Cipta Mandiri	Indonesia			
	Caustic Soda	PT Panda Mas Kimia Abadi	Indonesia			
	PVC	PT Sejahtera Sakti Indonesia	Indonesia			
	Caustic Soda	BusinessGarant-NN LLC	Russia			
	PVC	KB Polychem	India	PVC Laquer	Utsav Overseas Pvt Ltd	Nepal
		KNK Overseas	India			
		Mahan Polymers	India			
		Mangla Pipes Pvt Ltd.	India			
		Rukmani Polymers	India			
		St. Anthony's Industries Group	Sri Lanka	PVC Gutters	Deluxe Gutters Ltd	Kenya
Zhongtai International Development Hong Kong	PVC	Chenfeng New Materials Vietnam	China	see above		
		Zhejiang Tianzhen Technology Co	China	see above	Jufeng New Materials	China
				PVC Flooring	AFI Canada Ltd. (Armstrong)	Canada

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
					Airbase Carpet Mart	U.S.
					Armstrong Flooring Inc.	U.S.
					Building Plastics Inc.	U.S.
					Cesco Ltd. Partnership	Canada
					Derr Flooring	U.S.
					Diamond W Floor	U.S.
					Ecl Mission Carpet	U.S.
					Florstar Sales Inc.	U.S.
					Gesco Ltd. Partnership	Canada
					Gilford Johnson Flooring Atlanta	U.S.
					Habegger Flooring Dist Inc.	U.S.
					Hank's Specialties Inc.	U.S.
					Happy Feet International	U.S.
					Home Depot USA, Inc.	U.S.
					Home Legend	U.S.
					Mannington Mills Inc.	U.S.
					Mohawk Carpet Distribution Inc.	U.S.
					Nrf Distributors Inc.	U.S.
					Ohio Valley Mason	U.S.
					Opus Flooring Canada Corp.	U.S.
					Pg Long Floor Covering Llc	U.S.
					Primco Ltd.	Canada

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
					Provenza Floors Inc.	U.S.
					Redi Carpet	U.S.
					Shaw Floors India Private Ltd.	India
					Shaw Industries Group Inc.	U.S.
					Shnier Montreal	Canada
					Smith Floor Covering Distributors	U.S.
					Soho Studio Corp.	U.S.
					Tarkett Diamond W.	U.S.
					Tarkett Flooring Mexico S. De R.L. De C.V.	Mexico
					Tarkett Inc.	U.S.
					Tarkett Murfreesboro	U.S.
					Tarkett Usa Inc.	U.S.
					Wc Tingle Co.	U.S.
		Thuond Mai Va San Vuot An Thai	Vietnam	PVC Flooring		
		Loi Dat Advanced Materials (Vat Lieu Moi Loi Dat)	Vietnam	PVC Flooring	Top Win Enterprises	Hong Kong
		Phuc Ha Electrical Equipment Co (Thiet Bi Dien Nuoc Phuc Ha)	Vietnam	PVC Pipes/ Fittings (Dekko brand)	Super Three Diamond Co Ltd.	Myanmar
		Jufeng New Materials Vietnam	Vietnam			
			Vietnam	PVC Flooring	Vinsun Pte., Ltd.	Singapore

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
		Risesun New Materials Vietnam	Vietnam		Jiangsu Risesun New Materials	China
		Hoa Minh Chemical Co. (Hoa Chat Hoa Minh)				
		Co Phan Nhua Opec				
		Haixin Vietnam New Materials Co. (Vat Lieu Moi Haixin)				
		Jinka Building Materials Co (Cong Nghe Vat Lieu Xay Dung Jinka)	Vietnam	PVC Flooring (Mohawk Brand)	Always Rich Industrial	Taiwan
				PVC Flooring	Elite Shine Enterprises	Taiwan
					Jin Ho Asp International	Taiwan
					Karndean International	US
					Rich Merchants Co	Belize
Xinjiang Zhongtai Chemical	Caustic Soda	Biota Laut Ganggang	Indonesia		See Biota Laut Ganggang's customers above	
	PVC	Precision Plastic Industries Private Ltd	India	Articles made of PVC	Countrywide Electrical Distributors	UK
				UPVC Electrical Conduits	Electric Light Solution Pvt Ltd	Nepal
		Primex Industries	India			
		Prince Pipes and Fittings	India	PVC Pipes/Fittings	New Hardware Store Ltd	Tanzania
					Ascent Engineering	Seychelles
					Chimi Jamyang Enterprises	Bhutan
					Flotek Pipes Irrigation Zambia (TZ)	Zambia/Tanzania

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
					JB Furnishings Pvt Ltd	Nepal
					Jai Shree Bageshwari Trade Concern	Nepal
					Karyavinayak Industries Private Ltd.	Nepal
					Laxmi Trading	Seychelles
					Mangalam Universal Pvt Ltd	Nepal
					Neeta Sales Corporate Pvt Ltd	Nepal
					Ogonnac Investment	Sierra Leone
					Panchakanya Plastic Pvt., Ltd.	Nepal
					Panchakanya Rotomould Private Ltd.	Nepal
					Pt Senindo Kaya Abadi	Indonesia
					Sancheti Global Private Ltd.	Nepal
					Senindo Kaya Abadi	Indonesia
					St Anthony's Industries Group	Sri Lanka
					Wahj Al Hakm General Trading Co.	Iraq
		Sushila Parmar International Private Ltd	India			
		Abm International	India			
		Akshit Petrochem Pvt Ltd	India			
		Anil Enterprises	India			

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
		Anr International Private Ltd	India			
		Apollo Pipes Ltd	India	PVC Pipes/Fittings	NS Trade Link Ltd	Nepal
					Rodtek Engineering	South Africa
					Ioannis Milionis & Co. Ee	Greece
					Spandex International	Philippines
					Vrtina D O O	Slovenia
	Bansal Polymers	India				
	Bgm Petrochem Pvt Ltd.	India				
	Caustic Soda	Phuc Long Import Export Business and Production Joint Stock Co. (Phan San Xuat Va Kinh Doanh Xuat Nhap Khau Phuc Long)	Vietnam			
		Dai Cat Loi Chemical Import-Export Joint Stock Co (Phan Xuat Nhap Khau Dai Cat Loi)	Vietnam			
		Cp Vikohasan	Vietnam			
		Vu Hoang Chemical and Environmental Technology Co. (Cong Ty Tnhh Cong Nghe Hoa Chat Va Moi Truong Vu Hoang)	Vietnam			

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
		Tien Vinh Trading Investment Co. (Cong Ty Tnhh Dau Tu Thuong Mai Tien Vinh)	Vietnam			
		Kim Truong Chemical and Equipment Co (Cong Ty Tnhh Hoa Chat Va Thiet Bi Kim Truong)	Vietnam			
		Huy Hoang Trading and Service Production Co (Cong Ty Tnhh San Xuat Dich Vu Va Thuong Mai Huy Hoang)	Vietnam			
		An Thai Manufacturing and Trading Co Ltd (Cong Ty Tnhh Thuong Mai Va San Xuat An Thai)	Vietnam			
	PVC	Cosmic Consumer Goods Private Ltd.	India	PVC Leather Cloth	Undeclared	Saudi Arabia, Sri Lanka
		Devansh Chemicals Private Ltd.	India			
		Duke Pipes Privet Ltd.	India	PVC Pipes/Fittings	2 Hilcon Trading Corporation	Philippines
					Al Salam Bank Algeria	Algeria
					Al Wadi Al Kabir Trading and Contracting Co.	Oman

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
					Amwag Al Reedah Trading Cont Co.	Oman
					Khartoum State Water Corporation	Sudan
					LDD-WJ Groundwater Ltd.	Israel
					Mega Fastwork International Corp	Philippines
					Undeclared Australian company	Tanzania, Yemen, Kenya, Senegal, Israel, Lebanon, U.K. Algeria, Egypt, Saudi Arabia, UAE, Poland, Libya, Oman, Sri Lanka, Kuwait
		Fine Flow Plastic Industries	India			
		Gokul Polymers Private Ltd	India	PVC Pipes/Fittings	Ithaafushi Investment	Maldives
		JPO Polychem Pvt Ltd	India			

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
		JP Petrochem Pvt Ltd.	India			
		Jai Gopal International Imp & Export	India			
		Jindal Polytubes Pvt Ltd.	India			
		Mangla Pipes	India			
		Marvel Vinyls Ltd.	India	PVC Leather Cloth	undeclared	U.S., Nepal, U.A.E., Algeria, Cyprus, Somalia, Oman, Costa Rica, Qatar, Saudi Arabia, Sudan, Gambia, Mexico, Cote d'Ivoire
				PVC Sheet	undeclared	Italy, Ecuador, U.S., U.K., Canada, Saudi Arabia
				PVC Flooring	Shakti Construction Iris Trade Concern	Nepal Nepal
		SR Polyvinyl	India			
		Sagar Polytechnik	India	PVC Pipes/Fittings	undeclared	U.A.E., Algeria, Iraq,

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
						Mexico, South Africa, Libya, Brazil, Oman, Guatemala, Bulgaria, Qatar, Saudi Arabia, Ecuador, Somalia, Jordan, Djibouti, Tanzania, Kenya, Greece, Gambia, Mozambique, Chile, Ghana, Yemen
					Villareal Division Equipos S.A. de C.V.	Mexico
					Ferrux S.A.	Ecuador
					Industrias Unidas S.A. de C.V.	Mexico
					Motores Y Bombas Yucatecas S.A. de C.V.	Mexico
		SD Industries	India	PVC	Arrow Trading Co. Private Ltd.	Nepal

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
		Subhash Trading	India	PVC Pipes/Fittings		
		The Supreme Industries Ltd.	India		Abdulaziz Khan Saheb General	Bahrain
					Ballentine Private Ltd.	Maldives
					Bestway Plumbing	Seychelles
					Casamia Building Material Trading	Oman
					Coral Building Material	Oman
					Domus Engineering	U.K.
					Duplex Pvt Ltd	Maldives
					Future Hope Trading	U.A.E.
					Ideal International Co.	Oman
					Kurd Plastic Factory for Pipe, Window, and Doors	Sudan
					Mahe Design & Build	Seychelles
					Mahill Trading Corporation	Saudi Arabia
					Male Water And Sewerage Co.	Maldives
					Marton Geotechnical Services	U.K.
					MGS Europe Gmb H	Netherlands, Germany
					Multiple Industries Ltd.	Uganda, Kenya
					Planners General Trading and Contractors	Kuwait
					PVC Fabrications Ltd.	Ireland

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
					Rodha Khalid Plumbing and Electrical	Qatar
					SDR Drill Tech Ltd.	Ghana
					Seven Hills Drilling Co., Ltd.	Ghana
					SLP Engineering Lanka	Sri Lanka
					SLP Engineering Maldives Private	Maldives
					SSI / Stamford Scientific International	U.S.
					Static Co. Private Ltd.	Maldives
					Sunstar	Oman
					Tundi Shec J V	Nepal
					Western Pvc Hardware Stores	Sri Lanka
Xinjiang Shenxiong Chlor-Alkali	PVC				Zibo Hg Ceramics Co., Ltd.	U.K.
		Tirupati Structurals	India	PVC Pipes/Fittings	Hindustan Construction	Bhutan
		Ganpati Traders	India			
		Shivani Overseas	India			
		Tricon Energy	U.S. company, shipping from China	PVC	Ceyenar Chemicals Pvt Ltd	India
					Rishabh Triexim LLP	India
		Kirtanlal international DMCC	UAE company, shipping from China	PVC	Mahavir Polyfilms Pvt Ltd	India

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Uyghur Region Supplier	Product Exported	Intermediary Manufacturers	Country	Product Exported	Destination Corporation	Country
		Glitz Trading DMCC	UAE, shipping from China	PVC	Mahavir Polyfilms Pvt Ltd	India
		Green Land United	company origin unclear, shipping from China & Taiwan	PVC	Mahavir Polyfilms Pvt Ltd	India
		United Raw Material	Singapore company, shipping from China	PVC	Mahavir Polyfilms Pvt Ltd	India
		Calipar Trading FZE	UAE company, shipping from China	PVC	Recos Soil Substrates Pvt Ltd	India
		S Lon Lanka (Pvt) Ltd. (Sunquick Lanka)	Sri Lanka	PVC Roofing Products	Aqua Star	India
Aral Qinqsong (possible via Qingdao Haiwan)	PVC	St Anthony's Industries Group Pvt. L	Sri Lanka	PVC Gutters	Deluxe Gutters Ltd	Kenya
		Abra Logistics	Brazil			
		Tag Comercio International Ltda	Brazil			
		An Thanh Bicsol	Vietnam			



* In the original version of the report, LW Flooring was incorrectly named as an importer due to a mistake in the data provided by the customs records aggregator.

Built on repression: PVC building materials' reliance on forced labor and environmental abuses in the Uyghur region

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