

## BUSINESS AND HUMAN RIGHTS

### *Findings*

- Companies that do business in, source from, or work with companies in the Xinjiang Uyghur Autonomous Region (XUAR) are at risk of complicity in human rights abuses committed by the Chinese Communist Party and government. Reports of corporate involvement in mass atrocities in the XUAR implicate the agricultural, apparel, automotive, critical minerals, pharmaceutical, shipbuilding, and tourism industries.
- The *Uyghur Forced Labor Prevention Act* (UFLPA; Public Law No. 117-78) Entity List consists of nearly 150 PRC-based companies found to be complicit in rights abuses in the XUAR. XUAR Communist Party Secretary Ma Xingrui claimed in March 2025 that U.S. sanctions on entities over forced labor had “become one of the biggest challenges in the region’s development.” According to *Radio Free Asia*, this was the first time such an admission had been made by a representative of the Chinese government, “proving that international sanctions do have bite.”
- Reports from this past year link U.S. and Chinese companies, including **Apple**, **Google**, **Meta**, and **DeepSeek**, among others, in the Chinese government’s data collection, surveillance, and censorship efforts.
- During the 2025 reporting year, the Commission observed some U.S. companies downsizing, withdrawing, or closing operations in China in part to address U.S.-China geopolitical tensions and legal risks of non-compliance with PRC laws.
- Companies that operate in Hong Kong may find themselves implicated or at risk of complicity in sanctions evasion. Information and communications technology (ICT) companies may encounter difficulty navigating Hong Kong’s regulatory changes and threats to privacy and freedom of expression.

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### *Introduction*

China-based companies and international companies that seek to operate in the People's Republic of China (PRC) may find themselves complicit in, or at risk of complicity in, the PRC's human rights violations, including crimes against humanity, genocide, data collection, surveillance, and censorship.<sup>1</sup> Companies complicit in such abuses contravene existing U.S. laws and international human rights norms.<sup>2</sup>

### *Corporate Involvement in Human Rights Abuses in the XUAR*

Companies that do business in, source from, or work with companies in the Xinjiang Uyghur Autonomous Region (XUAR) are at risk of complicity in human rights abuses committed by the Chinese Communist Party (CCP) and government. PRC authorities have subjected individuals from ethnic minority groups in the XUAR to mass surveillance, mass arbitrary detention, forced family separations, and forced labor.<sup>3</sup> Companies are particularly at risk of complicity in crimes against humanity and genocide in the XUAR if they do business with the Xinjiang Production and Construction Corps (XPCC), its affiliate companies, or any other entities that have close ties to the XPCC.<sup>4</sup> The XPCC is a paramilitary organization sanctioned by the U.S. for its links to human rights abuses in the XUAR.<sup>5</sup>

Effective since June 21, 2022, the *Uyghur Forced Labor Prevention Act* (UFLPA; Public Law No. 117-78) establishes a rebuttable presumption that all goods made in whole or in part in the XUAR have been made with forced labor and that the importation of such goods is prohibited by Section 307 of the *Tariff Act of 1930* (19 U.S.C. Chapter 4).<sup>6</sup> The UFLPA Entity List consists of nearly 150 PRC-based companies found to be complicit in Uyghur forced labor.<sup>7</sup> This past year, the U.S. Department of Homeland Security added manufacturers of aspartame and steel to the list for the first time.<sup>8</sup> Other added entities included companies in the cotton, mining, and solar industries.<sup>9</sup> XUAR Communist Party Secretary Ma Xingrui claimed in March 2025 that U.S. sanctions on entities over forced labor had “become one of the biggest challenges in the region’s development.”<sup>10</sup> According to *Radio Free Asia*, this was the first time such an admission had been made by a representative of the Chinese government, “proving that international sanctions do have bite.”<sup>11</sup> In May 2025, U.S. Customs and Border Protection disclosed that 140 shipments valued at more than US\$3 million had been stopped pursuant to the UFLPA in April alone.<sup>12</sup>

Experts warned that goods made with forced labor continued to “flow through global supply chains.”<sup>13</sup> During the 2025 reporting year, the Commission observed the following reports detailing evidence of various industries implicated in or at risk of complicity in human rights abuses in the XUAR:

- **Agricultural industry.** A *BBC* investigation revealed that XUAR tomatoes linked to forced labor had been transported to Europe and found in tomato purees labeled as “Italian.”<sup>14</sup> According to lab tests of 64 tomato purees sold in supermarkets

across the United States, the United Kingdom, and Germany, 17 likely consisted of tomatoes from China.<sup>15</sup> Chinese state media outlet *People's Daily* had previously touted the XUAR as “one of the most suitable places in the country— or even the world—to process tomatoes.”<sup>16</sup> Adrian Zenz and I-Lin Lin reported on forced agricultural production mandates, labor transfer programs, government surveillance, and political indoctrination associated with the supply chains and production of tomatoes, red pepper pigments, stevia, and marigold in the XUAR.<sup>17</sup>

- **Apparel industry.** In September 2024, apparel and footwear company **Skechers** opened a new outlet in the XUAR.<sup>18</sup> Several experts criticized the opening, and Uyghur Human Rights Project research director Henryk Szadziwski questioned the ethical considerations underpinning the company's decision.<sup>19</sup> In February 2025, reporting by non-profit organization Disclose and television show *Cash Investigation* revealed that **Qingdao Jifa Group**, one of the suppliers of French sports apparel company **Decathlon**, “has been taking an active part” in Uyghur forced assimilation and forced labor policies.<sup>20</sup> Following the reporting, the National Basketball Association (NBA)—which sources NBA-branded apparel from Decathlon—claimed they were “addressing the allegations regarding Decathlon with the company directly.”<sup>21</sup>

- **Automotive industry.** According to supply chain mapping by U.S. analytics firm Kharon, several companies in the global automotive industry with links to Chinese suppliers of car parts—including electric vehicle batteries, glass, electronics, and tires—are at risk of complicity in abuses due to suppliers' links to government labor transfers or factories where forced labor is prevalent.<sup>22</sup> In January 2025, the *Guardian* reported that car parts, among other products, made by suppliers on the UFLPA Entity List, were found to have been imported into Australia's market.<sup>23</sup>

- **Critical minerals industry.** In June 2025, Global Rights Compliance, an international law foundation, released a report documenting how the production of beryllium, lithium, magnesium, and titanium in the PRC is linked to state-imposed forced labor transfer programs targeting Uyghurs and other Turkic ethnic groups.<sup>24</sup>

- **Pharmaceutical industry.** An October 2024 report by non-profit research organization Center for Advanced Defense Studies (C4ADS) found that pharmaceutical products and traditional Chinese and Uyghur medicines manufactured in the XUAR “expose global supply chains to forced labor.”<sup>25</sup> **China National Pharmaceutical Group Co. Ltd.**, one of China's largest pharmaceutical companies, and **Xinjiang Huashidan Pharmaceutical Co. Ltd.**, previously owned by the XPCC, reportedly participated in government-sponsored “poverty alleviation” forced labor and forced assimilation schemes.<sup>26</sup> **Xinjiang Deyuan Bioengineering Co. Ltd.** received government subsidies for manufacturing on land where Uyghurs previously lived, and **Xinjiang Nuziline Bio-Pharmaceutical Co. Ltd.** accepted forced labor transfers.<sup>27</sup> The U.S. Department of Homeland

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Security had not added these companies to the UFLPA Entity List as of January 2025.<sup>28</sup>

- **Shipbuilding industry.** In January 2025, the Office of the U.S. Trade Representative issued a report that found that PRC-owned company **China Baowu Steel Group** and its subsidiary **Xinjiang Bayi Iron and Steel Co. Ltd.**, which was added to the UFLPA Entity List in October 2024, participated in state-sponsored forced labor transfer schemes.<sup>29</sup> The report also found that **Shougang Group Co., Ltd.** and its XUAR-based subsidiary **Shougang Ili Iron & Steel Co.** likely engaged in the “mass incarceration” of Uyghurs.<sup>30</sup> China Baowu Steel Group and Shougang Group Co., Ltd. are considered key suppliers of steel for PRC shipbuilders.<sup>31</sup>
- **Tourism industry.** An April 2025 report published by the Uyghur Human Rights Project identified international hotel chains with “ownership structures and franchise agreements [with] Chinese companies . . . , participation in state-led programs such as Xinjiang Aid and labor transfers, and hotel presence in areas administered by the XPC.”<sup>32</sup>

### *Companies’ Role in Government Data Collection and Surveillance*

During the 2025 reporting year, the Commission observed reports of companies directly or indirectly supporting the PRC’s data collection and surveillance efforts. In November 2024, the non-profit publication *Rest of World* reported that the incubator program of U.S. technology company **Microsoft** may have inadvertently facilitated rights abuses linked to Chinese technology companies, including facial recognition startup **DeepGlint** and artificial intelligence (AI) analytics company **HYDATA**.<sup>33</sup> After completion of Microsoft’s program, DeepGlint sold surveillance camera systems to the Urumqi Public Security Bureau and was subsequently sanctioned by the United States in 2021 for its involvement in rights abuses in the XUAR.<sup>34</sup> HYDATA, which serves roughly 33 percent of the PRC’s police market and was previously recognized as a “technical support unit” for police in the XUAR, was also identified as a participant in Microsoft’s incubator program.<sup>35</sup> Scholar Jeffrey Ding observed that Microsoft could enable China’s surveillance state, intentionally or not, by investing in the “general infrastructure and foundations for technology.”<sup>36</sup> He said that investors should have “some responsibility . . . to have clarity” about potential implications of different technology applications, especially in China’s market.<sup>37</sup> [For more information about PRC data collection and surveillance, see Chapter 13—Technology and Human Rights.]

Companies with operations in China must comply with demands to provide information and access to data under the PRC’s cybersecurity and data security laws.<sup>38</sup> As a result, U.S. Government agencies, at both federal and state levels, and other governments, have restricted the use of China-based generative artificial intelligence chatbot **DeepSeek AI** on government devices and networks, citing privacy, surveillance, ethical, and national security concerns.<sup>39</sup> DeepSeek reportedly stores the biometric data and other personal information of users on servers in China and shares this information within its corporate group.<sup>40</sup> PRC officials have reportedly called on

Chinese AI companies to build their data centers in specific locations in order to have “greater visibility into their operations.”<sup>41</sup>

Reports emerged this past year showing that the mobile application stores for Apple and Google hosted free virtual private networks (VPNs) linked to the Chinese Communist Party and government, exposing U.S. users to potential PRC government surveillance and data collection. **Apple’s App Store** and **Google’s Play Store** hosted at least five free VPNs linked to PRC-listed company **360 Security Technology** also known as Qihoo 360, which is sanctioned by the U.S. for its ties to the People’s Liberation Army.<sup>42</sup> The research group Tech Transparency Project raised concerns about the VPNs’ ability to collect data on the activities of U.S.-based users, which may become accessible to PRC authorities.<sup>43</sup> Researchers described obfuscation tactics that companies deploy to conceal ownership structures and highlighted Apple’s failure to take “adequate steps to determine who owns the apps it offers its users and what they do with the data they collect.”<sup>44</sup>

### *Companies’ Role in Censorship and Removals*

Companies can face expulsion from the Chinese market, loss of revenue, or other forms of punishment for actions or speech that do not align with PRC narratives or censorship guidelines.<sup>45</sup> Multinational companies often, therefore, self-censor or assist the PRC in exporting censorship for the sake of maintaining market access, while Chinese companies operating overseas adhere to PRC censorship.<sup>46</sup> An academic explained in an August 2024 *Radio Free Asia* interview that “Chinese capital uses its commercial clout to demand political statements and threatens you with delisting if you don’t comply with China’s wishes.”<sup>47</sup>

U.S. and Chinese companies were both targets and enablers of PRC government censorship. Examples include the following:

- U.S. companies either directly or indirectly engaged in PRC government censorship.
  - **Apple.** In August 2024, Apple’s streaming platform Apple Music and Swedish music service Spotify reportedly removed the original version of the protest anthem “Glory to Hong Kong” for listeners in the United Kingdom, Canada, Taiwan, and Hong Kong.<sup>48</sup> The Hong Kong Court of Appeal had previously issued an injunction to limit the song from being broadcast on Hong Kong’s internet and media platforms on national security grounds.<sup>49</sup> DGX Music, the creators of the song, noted that the removal of the anthem from other jurisdictions “poses a serious threat to the principles of freedom of speech, freedom of the press and freedom of artistic expression.”<sup>50</sup>
  - **Google.** In February 2025, the *Guardian* reported that Google removed more than 200 videos after receiving a total of 412 removal requests from the Ministry of Public Security.<sup>51</sup> Of the 412, 346 “contained allegations about corruption within the political system in the People’s Republic of China or stories about top government officials.”<sup>52</sup>
  - **Meta.** According to an exclusive *Washington Post* article from March 2025, a former Meta employee claimed that the

company—at the time called Facebook—created a specialized censorship system in 2015 and considered loosening privacy protections for users in mainland China and Hong Kong in its unsuccessful efforts to break into China’s market.<sup>53</sup> The system reportedly included the ability to “automatically detect restricted terms and popular content.”<sup>54</sup> PRC authorities allegedly pressured company executives to crack down on political dissent and store data locally.<sup>55</sup>

- **Reddit**, an American social media platform, in October 2024 reportedly banned an online community forum that consisted of Chinese dissidents, according to U.S.-based nongovernmental organization Human Rights in China (HRIC).<sup>56</sup> HRIC noted that Chinese company Tencent is Reddit’s second-largest shareholder.<sup>57</sup> Some users expressed the belief that the ban was an example of the PRC’s “long-arm jurisdiction.”<sup>58</sup> [For more information on China’s transnational repression campaign, see Chapter 17—Human Rights Violations in the U.S. and Globally.]

- Chinese companies censored or removed content that does not support government or Party narratives.

- **Cathay Pacific**, an airline registered in Hong Kong, removed an episode of *Family Guy* from its in-flight entertainment system and apologized after receiving a complaint.<sup>59</sup> The episode reportedly made a reference to the 1989 Tiananmen protests.<sup>60</sup> In December 2024, *NBC News* explained that an internet user reported the airline’s inclusion of the episode to the National Security Department of the Hong Kong Police Force and accused Cathay Pacific of spreading “subversive ideas.”<sup>61</sup> [For more information about Hong Kong’s National Security Law, see Chapter 16—Hong Kong and Macau.]

- Chinese artificial intelligence chatbots by **DeepSeek** reportedly “self-censor” on sensitive topics.<sup>62</sup> Observers have pointed out instances of the chatbots’ ability to answer queries about Taiwan or the 1989 Tiananmen protests, for example, after which it proactively erases its responses, and deflects or prompts users to “talk about something else.”<sup>63</sup>

- In December 2024, the National Radio and Television Administration, which is subordinate to the Party’s Central Propaganda Department, warned **ByteDance’s** micro-drama streaming service **Hongguo** to “reflect deeply . . . act quickly, and make rectifications” after identifying several dramas on the platform that “set a bad example.”<sup>64</sup> Hongguo’s official account on social media platform Weixin issued a statement expressing the company’s commitment to improving its content-review protocols and preventing “the emergence of illegal content.”<sup>65</sup> According to a January 2025 announcement, the streaming service removed 279 micro-dramas from its platform and renamed 1,080 micro-dramas.<sup>66</sup>

- **NetEase Games**, a Chinese company, applied PRC censorship practices to its video game, *Marvel Rivals*.<sup>67</sup> Some players noted that certain phrases were flagged as inap-



propriate and banned from the game's internal chat function.<sup>68</sup> Banned phrases reportedly include "1989," "Tiananmen Square," "Free Tibet," and "Free Hong Kong."<sup>69</sup> The *New York Times* described the reported bans as "the latest example of Chinese censorship creeping into media that Americans consume."<sup>70</sup>

○ Chinese social media outlet **WeChat** continued to censor content that diverges from the government narrative about the economy.<sup>71</sup> In one example this past year, WeChat removed a viral speech by a Chinese economist that expressed pessimism about China's youth employment rates and economic health.<sup>72</sup> One observer warned that the PRC's censorship about the economy has "taken a darker turn of late, sending chills through anyone in the country who analyzes the economy as part of their profession."<sup>73</sup> [For more information on measures taken by PRC authorities to address the economy, see Chapter 4—Criminal Justice and Chapter 5—Governance and Rule of Law.]

○ Chinese video-sharing platform **Xiaohongshu**, also known as RedNote, censors politically sensitive topics such as Taiwan and the PRC government's treatment of Uyghurs.<sup>74</sup> Human Rights in China noted that the platform "functions dually as a social app and a vehicle for ideological influence."<sup>75</sup>

In February 2025, the *New York Times* reported that in recent years, Chinese companies have hired Western lawyers to levy defamation lawsuits against researchers in the United States, Europe, and Australia who have published reports documenting human rights violations, such as forced labor practices in the XUAR.<sup>76</sup> The use of libel lawsuits by PRC companies reportedly creates a perception of "high legal or political risk" and has the effect of silencing critics by introducing potential financial burdens for researchers.<sup>77</sup> [For more information on PRC censorship, see Chapter 1—Freedom of Expression.]

### *Doing Business in China: Risks and Considerations*

During the 2025 reporting period, the Commission observed some U.S. companies downsizing, withdrawing, or closing operations in China to, in part, address U.S.-China geopolitical tensions and legal risks of non-compliance with PRC laws. For example, U.S. consulting firm **Bain & Company** is downsizing its operations advising "sensitive industries" in China, according to the *Financial Times*, citing concerns about the evolving regulatory environment.<sup>78</sup> U.S. company **IBM** announced the closure of its research and development operations in China.<sup>79</sup> According to international media reports, the closures were likely decided upon in part due to geopolitical risks and the Chinese government's "growing obsession with security."<sup>80</sup> U.S. consulting firm **McKinsey & Company** downsized its China operations and separated them from its global operations.<sup>81</sup> The firm also reportedly stopped working with PRC government clients and limited its operations with state-owned firms and projects,<sup>82</sup> and one report noted that the company's senior partners are questioning "whether China is worth the risk."<sup>83</sup> Legal observers and

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international media noted the continued “exodus” of U.S. law firms from China.<sup>84</sup> Donald Clarke, professor emeritus at George Washington University Law School, commented that while security concerns, the risk of arbitrary detention, and the lack of attorney-client confidentiality are not new, “they have been rapidly increasing in salience.”<sup>85</sup>

This past year, the Commission observed reports of PRC actions impacting businesses in China that have Taiwanese staff. Effective since May 26, 2024, the *Opinion on Lawfully Punishing Obstinate “Taiwan Independence” Offenders for Committing or Inciting Separatism*, sometimes referred to as the *22 Guidelines*, lays out criteria explaining which activities promoting “Taiwan independence” may constitute the crime of “separatism” under Article 103 of the *PRC Criminal Law*.<sup>86</sup> Following the issuance of the guidelines, *Reuters* reported that some multinational companies considered relocating Taiwanese employees who work in China, citing potential legal and safety risks.<sup>87</sup> While the PRC Taiwan Affairs Office claimed that the *22 Guidelines* target “an extremely small number” of “offenders,” a lawyer interviewed by *Reuters* expressed concern about the “grey areas” of the PRC’s interpretation of “pro-independence activities.”<sup>88</sup> Such uncertainties can be seen in reported examples this past year, including PRC authorities blocking a senior executive from Taiwanese company **Formosa Plastics Group** from leaving mainland China, and the detaining of four Taiwanese **Foxconn** employees in mainland China.<sup>89</sup>

### DOING BUSINESS IN HONG KONG: RISKS AND CONSIDERATIONS

Companies that operate in Hong Kong may be implicated in, or at risk of complicity in, sanctions evasion. In July 2024, the Committee for Freedom in Hong Kong Foundation issued a report by American lawyer Samuel Bickett that revealed instances of Hong Kong-based operators transferring money, technology, and other commodities—which include products manufactured by multinational companies—to sanctioned entities in Russia, Iran, and North Korea.<sup>90</sup> One observer argued that, in light of new national security legislation, “Hong Kong is not the same—in fact, it’s a far riskier place to do business today than ever before.”<sup>91</sup> In a September 2024 updated Hong Kong business advisory, five U.S. Government agencies warned that U.S. businesses operating in Hong Kong may “face potential legal, regulatory, operational, financial, and reputational risks” and “conflicting jurisdictional requirements and liability in connection with sanctions compliance efforts.”<sup>92</sup> The advisory also noted heightened risks surrounding surveillance, data privacy, and freedom of expression.<sup>93</sup>

Information and communications technology companies, in particular, may encounter difficulty navigating Hong Kong’s regulatory changes and threats to privacy and freedom of expression.<sup>94</sup> Athena Tong of the China Strategic Risks Institute reported in November 2024 that Hong Kong’s national security laws present compliance challenges and operational vulnerabilities.<sup>95</sup> Tong’s report, in addition, warned of legal uncertainties and raised concerns about corporate complicity.<sup>96</sup> [For more information about rights abuses in Hong Kong, see Chapter 16—Hong Kong and Macau.]



## Notes to Chapter 12—Business and Human Rights

<sup>14</sup>“Convention on the Prevention and Punishment of the Crime of Genocide,” *United Nations*, adopted December 9, 1948, entry into force January 12, 1951, art. 2; “Convention on the Prevention and Punishment of the Crime of Genocide,” *United Nations Treaty Collection*, Chapter IV Human Rights; “Protect, Respect and Remedy: A Framework for Business and Human Rights: Report of the Special Representative of the Secretary-General on the Issue of Human Rights and Transnational Corporations and Other Business Enterprises, John Ruggie,” *United Nations*, A/HRC/8/5, April 7, 2008, paras. 73, 80. See also Congressional-Executive Commission on China, “Annual Report 2024,” *U.S. Government Publishing Office*, December 2024, 214–34, 258–67.

<sup>24</sup>“Uyghur Forced Labor Prevention Act,” Pub. L. No. 117–78; 19 U.S.C. § 1307; Office of the U.N. High Commissioner for Human Rights, “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework,” HR/PUB/11/04, 2011, principle 13; “Protect, Respect and Remedy: A Framework for Business and Human Rights: Report of the Special Representative of the Secretary-General on the Issue of Human Rights and Transnational Corporations and Other Business Enterprises, John Ruggie,” *United Nations*, A/HRC/8/5, April 7, 2008, paras. 73, 80.

<sup>34</sup>“Convention on the Prevention and Punishment of the Crime of Genocide,” *United Nations*, adopted December 9, 1948, entry into force January 12, 1951, art. 2; “Convention on the Prevention and Punishment of the Crime of Genocide,” *United Nations Treaty Collection*, Chapter IV Human Rights; “China: UN Needs to Address Crimes Against Humanity,” *Human Rights Watch*, August 27, 2024.

<sup>44</sup>Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order,” *U.S. Department of the Treasury*, July 31, 2020. For a discussion of the XPCC’s involvement in human rights abuses in the XUAR from the Commission’s previous reporting, see Congressional-Executive Commission on China, “Annual Report 2020,” *U.S. Government Publishing Office*, December 2020, 240–41; Congressional-Executive Commission on China, “Annual Report 2023,” *U.S. Government Publishing Office*, May 2024, 248, 250.

<sup>54</sup>Treasury Sanctions Chinese Entity and Officials Pursuant to Global Magnitsky Human Rights Executive Order,” *U.S. Department of the Treasury*, July 31, 2020.

<sup>64</sup>“Uyghur Forced Labor Prevention Act,” Pub. L. No. 117–78; 19 U.S.C. § 1307.

<sup>74</sup>“Uyghur Forced Labor Prevention Act,” Pub. L. No. 117–78; “UFLPA Entity List,” *U.S. Department of Homeland Security*, accessed June 16, 2025; “DHS Announces Addition of 37 PRC-Based Companies to UFLPA Entity List,” *U.S. Department of Homeland Security*, January 14, 2025; “Notice Regarding the Uyghur Forced Labor Prevention Act Entity List: A Notice by the Homeland Security Department on 01/15/2025,” *Federal Register*, January 15, 2025. Pursuant to the UFLPA, the Entity List is a consolidated register of four lists: “(1) a list of entities in the [XUAR] that mine, produce, or manufacture wholly or in part any goods, wares, articles, and merchandise with forced labor; 2) a list of entities working with the government of the [XUAR] to recruit, transport, transfer, harbor, or receive forced labor of Uyghurs, Kazakhs, Kyrgyz, or members of other persecuted groups out of the [XUAR]; 3) a list of entities that exported products made by entities in lists 1 and 2 from the [PRC] into the United States; and 4) a list of facilities and entities, including the Xinjiang Production and Construction Corps, that source material from the [XUAR] or from persons working with the government of Xinjiang or the Xinjiang Production and Construction Corps for purposes of the ‘poverty alleviation’ program or the ‘pairing-assistance’ program of any other government-labor scheme that uses forced labor.” As of May 2025, the last additions to the Entity List were announced in January 2025.

<sup>84</sup>“US Expands UFLPA Entity List, Targets Steel and Aspartame for First Time,” *Brief, Kharon*, October 3, 2024.

<sup>94</sup>“DHS Announces Addition of 37 PRC-Based Companies to UFLPA Entity List,” *U.S. Department of Homeland Security*, January 14, 2025; Therese Scocco, “Chinese Mining Giant among Firms Held in Western Investment Funds Added to US Forced Labor List,” *Brief, Kharon*, January 24, 2025; “CBP Releases Updated Entity List: New Focus on Magnesium and Critical Raw Minerals,” *Sourcemap*, September 4, 2024.

<sup>10</sup>Cui Jia, “Sanctions Challenging Xinjiang Biz,” *China Daily*, March 8, 2025; Cui Jia, “Party Head Rails against ‘Smears’ that Harm Xinjiang,” *China Daily*, March 7, 2025.

<sup>11</sup>Qian Lang, Yitong Wu, and Ha Syut, “5 Takeaways from China’s National People’s Congress,” *Radio Free Asia*, March 11, 2025.

<sup>12</sup>“CBP Releases April 2025 Monthly Update,” *U.S. Customs and Border Protection*, May 12, 2025.

<sup>13</sup>Victoria A. Greenfield et al., “Forced Labor in Global Supply Chains: Trade Enforcement Impacts and Opportunities,” *RAND Corporation*, January 8, 2025, v.

<sup>14</sup>Mike Rudin and Sarah Buckley, “Italian’ Purees in UK Supermarkets Likely to Contain Chinese Forced-Labour Tomatoes,” *BBC*, December 1, 2024.

<sup>15</sup>Mike Rudin and Sarah Buckley, “Italian’ Purees in UK Supermarkets Likely to Contain Chinese Forced-Labour Tomatoes,” *BBC*, December 1, 2024. For information on tomato products linked to state-sponsored forced labor in the XUAR from the Commission’s previous reporting, see Congressional-Executive Commission on China, “Annual Report 2022,” *U.S. Government Publishing Office*, November 2022, 259; Congressional-Executive Commission on China, “Annual Report 2024,” *U.S. Government Publishing Office*, December 2023, 215.

<sup>16</sup>“Tomato Industry Thrives in China’s Xinjiang,” *People’s Daily*, July 10, 2024.

<sup>17</sup>Adrian Zenz and I-Lin Lin, “Forced Labor, Coercive Land-Use Transfers, and Forced Assimilation in Xinjiang’s Agricultural Production,” *International Network for Critical China Studies*, December 12, 2024, 6, 9.

<sup>18</sup>Kasim Kashgar, “Skechers Opens Store in Xinjiang amid Scrutiny over Uyghur Forced Labor Sanctions,” *Voice of America*, October 8, 2024.

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<sup>19</sup>Jilil Kashgary, “Rights Groups Blast Skechers Over New Store in Xinjiang,” *Radio Free Asia*, October 11, 2024; Kasim Kashgar, “Skechers Opens Store in Xinjiang Amid Scrutiny Over Uyghur Forced Labor Sanctions,” *Voice of America*, October 8, 2024; Kelly Stroh, “Skechers Supplier Accused of Using Forced Labor,” *Supply Chain Dive*, June 25, 2024; “Notice Regarding the Uyghur Forced Labor Prevention Act Entity List: A Notice by the Homeland Security Department on 06/12/2024,” *Federal Register*, June 12, 2024. The company’s supplier, Dongguan Oasis Shoes Co. Ltd., was added to the UFLPA Entity List in June 2024.

<sup>20</sup>Pierre Leibovici and Gabriel Garcia, “Decathlon Profits from Uyghur Forced Labour in China,” *Disclose*, February 7, 2025; “Our Mission,” *Disclose*, (webpage), accessed March 27, 2025; “Cash Investigation,” *IMDb*, (webpage), accessed March 27, 2025.

<sup>21</sup>“NBA in Touch with Decathlon over China Forced Labour Accusations,” *France 24*, updated February 7, 2025. See also Christopher Smith and Jeffrey A. Merkley, “Letter,” *Congressional-Executive Commission on China*, addressed to Commissioner Adam Silver, National Basketball Association, September 28, 2023.

<sup>22</sup>Kharon Staff, “Auto Industry Faces Forced Labor Risks Amid China’s Dominance of Supply Chains,” *Brief, Kharon*, November 6, 2024. For a discussion of the PRC government’s “poverty alleviation” program and forced labor involving Turkic and Muslim XUAR residents, see Congressional-Executive Commission in China, “Annual Report 2023,” *U.S. Government Publishing Office*, May 2024, 308.

<sup>23</sup>Christopher Knaus and Helen Davidson, “Thousands of Imports Enter Australia from Firms Blacklisted by US Over Alleged Uyghur Forced Labour Links,” *Guardian*, January 19, 2025.

<sup>24</sup>“Risk at the Source: Critical Mineral Supply Chains and State-Imposed Forced Labour in the Uyghur Region,” *Global Rights Compliance*, June 2025.

<sup>25</sup>Mishel Kondi, “Side Effects: The Human Rights Implications of Global Pharmaceutical Supply Chain Linkages to XUAR,” *C4ADS*, October 8, 2024, 5, 14, 17.

<sup>26</sup>Mishel Kondi, “Side Effects: The Human Rights Implications of Global Pharmaceutical Supply Chain Linkages to XUAR,” *C4ADS*, October 8, 2024, 5, 20, 26–27.

<sup>27</sup>Mishel Kondi, “Side Effects: The Human Rights Implications of Global Pharmaceutical Supply Chain Linkages to XUAR,” *C4ADS*, October 8, 2024, 22–25.

<sup>28</sup>“Notice Regarding the Uyghur Forced Labor Prevention Act Entity List: A Notice by the Homeland Security Department on 01/15/2025,” *Federal Register*, January 15, 2025.

<sup>29</sup>“Section 301 Investigation: Report on China’s Targeting of Maritime, Logistics, and Ship-building Sectors for Dominance,” *Office of the U.S. Trade Representative*, January 16, 2025, 93–95.

<sup>30</sup>“Section 301 Investigation: Report on China’s Targeting of Maritime, Logistics, and Ship-building Sectors for Dominance,” *Office of the U.S. Trade Representative*, January 16, 2025, 96–97.

<sup>31</sup>“Section 301 Investigation: Report on China’s Targeting of Maritime, Logistics, and Ship-building Sectors for Dominance,” *Office of the U.S. Trade Representative*, January 16, 2025, 94, 96.

<sup>32</sup>Peter Irwin et al., “It Does Matter Where You Stay: International Hotel Chains in East Turkistan,” *Uyghur Human Rights Project*, April 17, 2025. For a discussion of the tourism industry’s complicity in abuses in the XUAR from the Commission’s 2024 reporting year, see Congressional-Executive Commission on China, “Annual Report 2024,” *U.S. Government Publishing Office*, December 2024, 215–216. See also “Xinjiang: Chairs Write to Travel Companies and U.S. State Department Concerning the Whitewashing of Atrocities,” *Congressional-Executive Commission on China*, March 6, 2024.

<sup>33</sup>Joanna Chiu, “Chinese Startups Supported by Microsoft and Google Incubator Programs Worked With Police,” *Rest of World*, November 19, 2024.

<sup>34</sup>Joanna Chiu, “Chinese Startups Supported by Microsoft and Google Incubator Programs Worked With Police,” *Rest of World*, November 19, 2024; Congressional-Executive Commission on China, “Annual Report 2022,” *U.S. Government Publishing Office*, November 2022, 262, 309.

<sup>35</sup>Joanna Chiu, “Chinese Startups Supported by Microsoft and Google Incubator Programs Worked With Police,” *Rest of World*, November 19, 2024.

<sup>36</sup>Joanna Chiu, “Chinese Startups Supported by Microsoft and Google Incubator Programs Worked With Police,” *Rest of World*, November 19, 2024.

<sup>37</sup>Joanna Chiu, “Chinese Startups Supported by Microsoft and Google Incubator Programs Worked With Police,” *Rest of World*, November 19, 2024.

<sup>38</sup>“中华人民共和国网络安全法” [PRC Cybersecurity Law], passed November 7, 2016, effective June 1, 2017; “中华人民共和国数据安全法” [PRC Data Security Law], passed June 10, 2021, effective September 1, 2021; “中华人民共和国个人信息保护法” [PRC Personal Information Protection Law], passed August 20, 2021, effective November 1, 2021.

<sup>39</sup>Matt Burgess and Lily Hay Newman, “DeepSeek’s Popular AI App is Explicitly Sending US Data to China,” *Wired*, updated January 29, 2025; Hayden Field, “U.S. Navy Bans Use of DeepSeek due to ‘Security and Ethical Concerns,’” *CNBC*, January 28, 2025; Katrina Manson and Jordan Robertson, “Pentagon Staff Used DeepSeek’s Chatbot for Days Before Block,” *Bloomberg*, updated January 31, 2025; Lora Kolodny, “NASA Becomes Latest Federal Agency to Block China’s DeepSeek on ‘Security and Privacy Concerns,’” *CNBC*, updated January 31, 2025; Karen Freifeld, “US Commerce Department Bureaus Ban China’s DeepSeek on Government Devices, Sources Say,” *Reuters*, updated March 17, 2025; Joe Panettieri, “DeepSeek: Banned and Permitted in Which Countries? List of Government Actions vs. China-based AI Software,” *Sustainable Tech Partner*, May 11, 2025.

<sup>40</sup>Matt Burgess and Lily Hay Newman, “DeepSeek’s Popular AI App is Explicitly Sending US Data to China,” *Wired*, updated January 29, 2025; Simone McCarthy, “DeepSeek is Giving the World a Window into Chinese Censorship and Information Control,” *CNN*, January 29, 2025.

<sup>41</sup>Qianer Liu, “China Tightens Control over AI Data Centers,” *Information*, May 15, 2025.

<sup>42</sup>Michael Acton and Ryan McMorrow, “Apple and Google App Stores Host VPNs Linked to Sanctions-Hit Chinese Group,” *Financial Times*, April 1, 2025; “Commerce Department to Add Two Dozen Chinese Companies with Ties to WMD and Military Activities to the Entity List,”

Office of Public Affairs, U.S. Department of Commerce, May 22, 2020; “Entities Identified as Chinese Military Companies Operating in the United States in Accordance with Section 1260H of the William M. (“Mac”) Thornberry National Defense Authorization Act for Fiscal Year 2021 (Public Law 116-283),” U.S. Department of Defense, accessed June 26, 2025.

<sup>43</sup>“Apple Offers Apps with Ties to Chinese Military,” *Tech Transparency Project*, April 1, 2025; Michael Acton and Ryan McMorrow, “Apple and Google App Stores Host VPNs Linked to Sanctions-Hit Chinese Group,” *Financial Times*, April 1, 2025.

<sup>44</sup>Michael Acton and Ryan McMorrow, “Apple and Google App Stores Host VPNs Linked to Sanctions-Hit Chinese Group,” *Financial Times*, April 1, 2025; “Apple Offers Apps with Ties to Chinese Military,” *Tech Transparency Project*, April 1, 2025.

<sup>45</sup>“Corporate Intimidation & Censorship in China: Recommendations for Foreign Companies,” *Human Rights Foundation*, June 2020, 5, 8; Congressional-Executive Commission on China, “Annual Report 2022,” U.S. Government Publishing Office, November 2022, 262–64; Congressional-Executive Commission on China, “Annual Report 2024,” U.S. Government Publishing Office, December 2024, 218–19; Congressional-Executive Commission on China, “Annual Report 2023,” U.S. Government Publishing Office, May 2024, 249.

<sup>46</sup>“Corporate Intimidation & Censorship in China: Recommendations for Foreign Companies,” *Human Rights Foundation*, June 2020, 5, 8; Congressional-Executive Commission on China, “Annual Report 2022,” U.S. Government Publishing Office, November 2022, 262–64; Congressional-Executive Commission on China, “Annual Report 2023,” U.S. Government Publishing Office, May 2024, 253.

<sup>47</sup>Hsia Hsiao-hwa, Ray Chung, and Lee Heung Yeung, “Chinese Calls for Taiwan Hotel Boycott Part of Propaganda Machine,” *Radio Free Asia*, August 19, 2024.

<sup>48</sup>Luk Nam Choi, “Apple, Spotify Take Down Banned Hong Kong Protest Anthem,” *Radio Free Asia*, August 22, 2024; “About Us,” *Spotify*, (webpage), accessed April 1, 2025.

<sup>49</sup>“Interim Injunction Order CACV 274/2023 (On Appeal from HCA 855/2023)—To Restrain Four Specified Criminal Acts in Relation To a Song,” *Hong Kong Police Force*, accessed May 27, 2025; Kanis Leung, “The Distributor of a Popular Hong Kong Protest Song Will Remove it from All Platforms, Creator Says,” *Associated Press*, updated May 24, 2024. The song “Glory to Hong Kong” was previously commonly confused by international sporting audiences with the city’s official anthem.

<sup>50</sup>Luk Nam Choi, “Apple, Spotify Take Down Banned Hong Kong Protest Anthem,” *Radio Free Asia*, August 22, 2024; Hong Kong Democracy Council (@hkdc\_us), “DGX Music, the creative team behind the anthem #願榮光歸香港, has issued a short statement: ‘Distribution companies in the UK, Canada & US have all knelt down. #GloryToHongKong will disappear from all streaming platforms in the short term.’ It’s gone from @spotify & @AppleMusic,” X, August 21, 2024, 12:55 p.m. See also Christopher Smith and Jeffrey A. Merkley, “Letter,” *Congressional-Executive Commission on China*, addressed to Sundar Pichai, Chief Executive Officer, Google, and Neal Mohan, Chief Executive Officer, YouTube, June 4, 2024.

<sup>51</sup>Sián Boyle, “Revealed: Google Facilitated Russia and China’s Censorship Requests,” *Guardian*, February 15, 2025.

<sup>52</sup>Sián Boyle, “Revealed: Google Facilitated Russia and China’s Censorship Requests,” *Guardian*, February 15, 2025.

<sup>53</sup>Naomi Nix, “Zuckerberg’s Meta Considered Sharing User Data with China, Whistleblower Alleges,” *Washington Post*, March 9, 2025. See also Mike Isaac, “Facebook Changes Corporate Name to Meta,” *New York Times*, updated November 10, 2021.

<sup>54</sup>Naomi Nix, “Zuckerberg’s Meta Considered Sharing User Data with China, Whistleblower Alleges,” *Washington Post*, March 9, 2025.

<sup>55</sup>Naomi Nix, “Zuckerberg’s Meta Considered Sharing User Data with China, Whistleblower Alleges,” *Washington Post*, March 9, 2025.

<sup>56</sup>“Reddit Bans Forum for Chinese Dissidents, Chinese Government Influence Suspected,” *Human Rights in China*, October 29, 2024.

<sup>57</sup>“Reddit Bans Forum for Chinese Dissidents, Chinese Government Influence Suspected,” *Human Rights in China*, October 29, 2024.

<sup>58</sup>“Reddit Bans Forum for Chinese Dissidents, Chinese Government Influence Suspected,” *Human Rights in China*, October 29, 2024.

<sup>59</sup>Sayed Ismail Nafeesa and Jennifer Jett, “Hong Kong Airline Removes ‘Family Guy’ Episode with Tiananmen Square Reference,” *NBC*, December 4, 2024.

<sup>60</sup>Sayed Ismail Nafeesa and Jennifer Jett, “Hong Kong Airline Removes ‘Family Guy’ Episode with Tiananmen Square Reference,” *NBC*, December 4, 2024.

<sup>61</sup>Sayed Ismail Nafeesa and Jennifer Jett, “Hong Kong Airline Removes ‘Family Guy’ Episode with Tiananmen Square Reference,” *NBC*, December 4, 2024.

<sup>62</sup>Saritha Rai and Newley Purnell, “What is China’s DeepSeek and Why is it Freaking Out the AI World?” *Bloomberg*, updated January 28, 2025; James T. Aredy and Isabella Simonetti, “DeepSeek’s Chatbot Works Like Its U.S. Rivals—Until You Ask About Tiananmen,” *Wall Street Journal*, updated January 30, 2025; Alex Colville “Rehabilitating DeepSeek,” *China Media Project*, March 4, 2025.

<sup>63</sup>Jinhan Li, “What Questions Will China’s DeepSeek Not Answer?,” *Deutsche Welle*, January 31, 2025; Simone McCarthy, “DeepSeek is Giving the World a Window into Chinese Censorship and Information Control,” *CNN*, January 29, 2025.

<sup>64</sup>Alex Colville, “China’s Fastest Growing App,” *China Media Project*, January 22, 2025; National Radio and Television Administration, “广电部门对‘红果短剧’规范发展提出要求” [The Radio and Television Department Puts Forward Requirements for “Hongguo”], *Weixin*, December 26, 2024.

<sup>65</sup>Hongguo Micro-Drama Official Account, “红果短剧深入落实广电主管部门指导要求、加强内容治理” [Hongguo Micro-Drama Thoroughly Implements Guidance Requirements of the National

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Radio and Television Administration and Strengthens Content Management], *Weixin*, December 26, 2024.

<sup>66</sup>Hongguo Micro-Drama Official Account, “红果短剧关于打击违规微短剧的公告（24年12月）” [Hongguo Micro-Drama’s Announcement on Cracking Down on Illegal Short Dramas (December 2024)], *Weixin*, January 10, 2025.

<sup>67</sup>Connor O’Keefe, “Marvel Rivals Censorship Explained,” *Game Rant*, January 9, 2025; German Lopez, “Censoring Games,” *New York Times*, February 23, 2025.

<sup>68</sup>Connor O’Keefe, “Marvel Rivals Censorship Explained,” *Game Rant*, January 9, 2025; German Lopez, “Censoring Games,” *New York Times*, February 23, 2025.

<sup>69</sup>Connor O’Keefe, “Marvel Rivals Censorship Explained,” *Game Rant*, January 9, 2025; German Lopez, “Censoring Games,” *New York Times*, February 23, 2025.

<sup>70</sup>German Lopez, “Censoring Games,” *New York Times*, February 23, 2025. For an example of how China-based video game developers apply PRC censorship in previous Commission reporting, see Congressional-Executive Commission on China, “Annual Report 2023,” *U.S. Government Publishing Office*, May 2024, 254.

<sup>71</sup>Yaqiu Wang, “The Boomerang Effect on Beijing’s Economic Censorship,” *Diplomat*, October 1, 2024; Wang Yun, “China Deletes Warning that Youth Unemployment is Tanking Economy,” *Radio Free Asia*, December 4, 2024. For information about censorship on WeChat from the Commission’s previous reporting years, see Congressional-Executive Commission on China, “Annual Report 2024,” *U.S. Government Publishing Office*, December 2024, 218; Congressional-Executive Commission on China, “Annual Report 2023,” *U.S. Government Publishing Office*, May 2023, 253–254.

<sup>72</sup>Wang Yun, “China Deletes Warning that Youth Unemployment is Tanking Economy,” *Radio Free Asia*, December 4, 2024.

<sup>73</sup>Yaqiu Wang, “The Boomerang Effect on Beijing’s Economic Censorship,” *Diplomat*, October 1, 2024.

<sup>74</sup>Rose Laoutaris, “Free Speech Isn’t Welcome on RedNote App,” *American Legislative Exchange Council*, January 23, 2025.

<sup>75</sup>“TikTok Users Move to Xiaohongshu, or ‘Red Note,’ A Chinese App with Overt Censorship and Data Collection,” *Human Rights in China*, January 14, 2025.

<sup>76</sup>David McCabe and Tripp Mickle, “Chinese Companies’ New Tactic to Stop Damaging Research: Legal Threats,” *New York Times*, February 11, 2025.

<sup>77</sup>David McCabe and Tripp Mickle, “Chinese Companies’ New Tactic to Stop Damaging Research: Legal Threats,” *New York Times*, February 11, 2025; Bethany Allen, “Libel Lawfare,” *Wired China*, July 28, 2024.

<sup>78</sup>Simon Foy and Stephen Foley, “Bain’s New Boss Says Consultancy Pulling Back from Work in China,” *Financial Times*, June 30, 2024. See also Congressional-Executive Commission on China, “Annual Report 2023,” *U.S. Government Publishing Office*, May 2024, 253. Chinese police had previously visited the Shanghai municipality office of the firm more than once to interrogate employees and confiscate computers and phones.

<sup>79</sup>Raffaele Huang, “IBM Shuts China R&D Operations in Latest Retreat by U.S. Companies,” *Wall Street Journal*, updated August 26, 2024; Ivana Saric, “IBM is Latest U.S. Tech Giant to Pull Back from China,” *Axios*, updated August 26, 2024.

<sup>80</sup>Brody Ford and Edwin Chan, “IBM to Shut China R&D Team, Affecting Less than 1,000 Staff,” *Bloomberg*, updated August 26, 2024; Juliana Liu and Joyce Jiang, “IBM is the Latest Western Firm to Retreat from China,” *CNN*, August 27, 2024; Milton Ezrati, “IBM Decides to Move R&D Out of China,” *Forbes*, September 7, 2024.

<sup>81</sup>Yoko Kubota and Raffaele Huang, “McKinsey Revamps Its China Operations Amid New Risks,” *Wall Street Journal*, updated October 17, 2024; Ambereen Choudhury and Chanyaporn Chanjaroen, “McKinsey Partners Debate China Presence as US Tensions Rise,” *Bloomberg*, updated February 6, 2025.

<sup>82</sup>Yoko Kubota and Raffaele Huang, “McKinsey Revamps Its China Operations Amid New Risks,” *Wall Street Journal*, updated October 17, 2024.

<sup>83</sup>Ambereen Choudhury and Chanyaporn Chanjaroen, “McKinsey Partners Debate China Presence as US Tensions Rise,” *Bloomberg*, updated February 6, 2025.

<sup>84</sup>Maisy Mok, “Fight or Flight?,” *China Business Law Journal*, October 7, 2024; Donald Clarke et al., “Behind the Exodus of U.S. Law Firms from China,” *ChinaFile*, January 23, 2025; Tatyana Monnay, “Cleary Gottlieb Set to Leave China as Big Law Exodus Continues,” *Bloomberg Law*, February 17, 2025; Staci Zaretsky, “Top Biglaw Firm Closes its Fourth China Office, Leaving it Without a Presence in Asia,” *Above the Law*, March 20, 2025.

<sup>85</sup>Donald Clarke et al., “Behind the Exodus of U.S. Law Firms from China,” *ChinaFile*, January 23, 2025; “Donald Clarke,” *ChinaFile*, updated September 25, 2024.

<sup>86</sup>Supreme People’s Court, Supreme People’s Procuratorate, Ministry of Public Security, Ministry of State Security, and Ministry of Justice, “关于依法惩治‘台独’顽固分子分裂国家、煽动分裂国家犯罪的意见” [Opinion on Lawfully Punishing Obstinate ‘Taiwan Independence’ Offenders for Committing or Inciting Separatism], issued May 26, 2024, effective June 21, 2024; Jake Chung, “US House Members Condemn China’s New 22 Guidelines,” *Taipei Times*, July 14, 2024; Laurie Chen, “Firms Weigh Removing Taiwan Staff from China after Death Penalty Threat,” *Reuters*, July 4, 2024.

<sup>87</sup>Laurie Chen, “Firms Weigh Removing Taiwan Staff from China after Death Penalty Threat,” *Reuters*, July 4, 2024.

<sup>88</sup>“国台办：刑事惩治措施只针对极少数‘台独’顽固分子不针对广大台胞” [Taiwan Affairs Office: Criminal measures only target an extremely small number of “Taiwan independence” offenders and not the majority of Taiwan compatriots], *PRC Taiwan Affairs Office, State Council*, July 12, 2024; Laurie Chen, “Firms Weigh Removing Taiwan Staff from China after Death Penalty Threat,” *Reuters*, July 4, 2024.



<sup>89</sup>Thompson Chau, "China Blocks Taiwan Executive from Returning Home," *Nikkei Asia*, September 19, 2024; Joyu Wang, "China Detains Employees at Apple iPhone Factory Run by Foxconn," *Wall Street Journal*, October 10, 2024; Keith Bradsher and Amy Chang Chien, "Taiwanese Employees of Apple Supplier Detained in China," *New York Times*, October 11, 2024.

<sup>90</sup>Samuel Bickett, "Beneath the Harbor: Hong Kong's Leading Role in Sanctions Evasion," *Committee for Freedom in Hong Kong Foundation*, July 2024, ii, iv, 10–12, 14–16, 31.

<sup>91</sup>Olivia Enos, "Hong Kong's Economy is Now Risky Business," *Forbes*, July 30, 2024.

<sup>92</sup>"Hong Kong Business Advisory," *Office of the Spokesperson, U.S. Department of State*, September 6, 2024.

<sup>93</sup>U.S. Department of State, U.S. Department of Agriculture, U.S. Department of Commerce, U.S. Department of Homeland Security, and U.S. Department of Treasury, "Updated Hong Kong Business Advisory - Amendment to the July 2021 Business Advisory on Risks and Considerations for Businesses Operating in Hong Kong," September 6, 2024, 8–9.

<sup>94</sup>Athena Tong, "Web of Control: Hong Kong's Crackdown on Internet Freedom," *China Strategic Risks Institute*, November 2024, 4, 47.

<sup>95</sup>Athena Tong, "Web of Control: Hong Kong's Crackdown on Internet Freedom," *China Strategic Risks Institute*, November 2024, 49, 50.

<sup>96</sup>Athena Tong, "Web of Control: Hong Kong's Crackdown on Internet Freedom," *China Strategic Risks Institute*, November 2024, 4, 49, 50.