

# bendi

## Assessing exposure to Xinjiang

5th December 2024



# Agenda

1. Introduction to Bendi
2. Overview and definitions
3. Case study
4. Horizon scanning

# Building connections in supply chains.

01

## Contact free mapping

Bendi identifies your supply chain connections and deeper suppliers through a rapid tier-n mapping solution



# Uncovering ESG risks for the entire value chain.

Wages & working  
conditions

Business conduct

Deforestation



## 02

### 100+ risk indicators

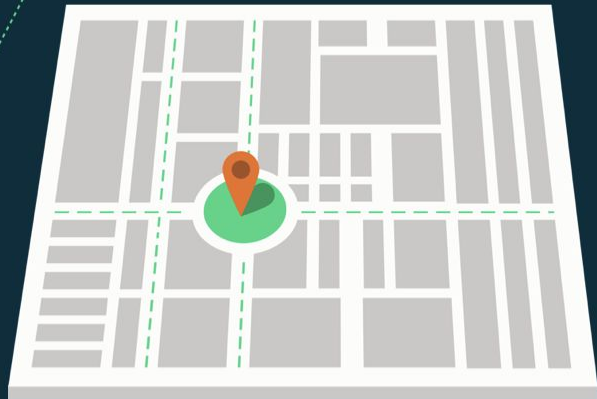
Bendi searches through millions of data points in multiple languages to surface unknown risk events in your supply chain at specific sites

# Understanding geographic risks and local context.

## 03

### Context change alerts

Bendi tracks changes in short and long-term risks at the local level to flag potential business disruption



# Overview





# Food products from XUAR



**Walnuts**



**Tomatoes**



**Tomato  
paste**



**Dates**



**Grapes**



**Marigolds**



**Peppers**



**Paprika**



**Capsicum**



**Caustic  
soda**



**Food  
dyes**

SOURCE:

<https://www.shu.ac.uk/-/media/home/research/helena-kennedy-centre/projects/evidence-briefs/shu-brief-3-products-made-with-forced-labor-in-the-uyghur-region.pdf>

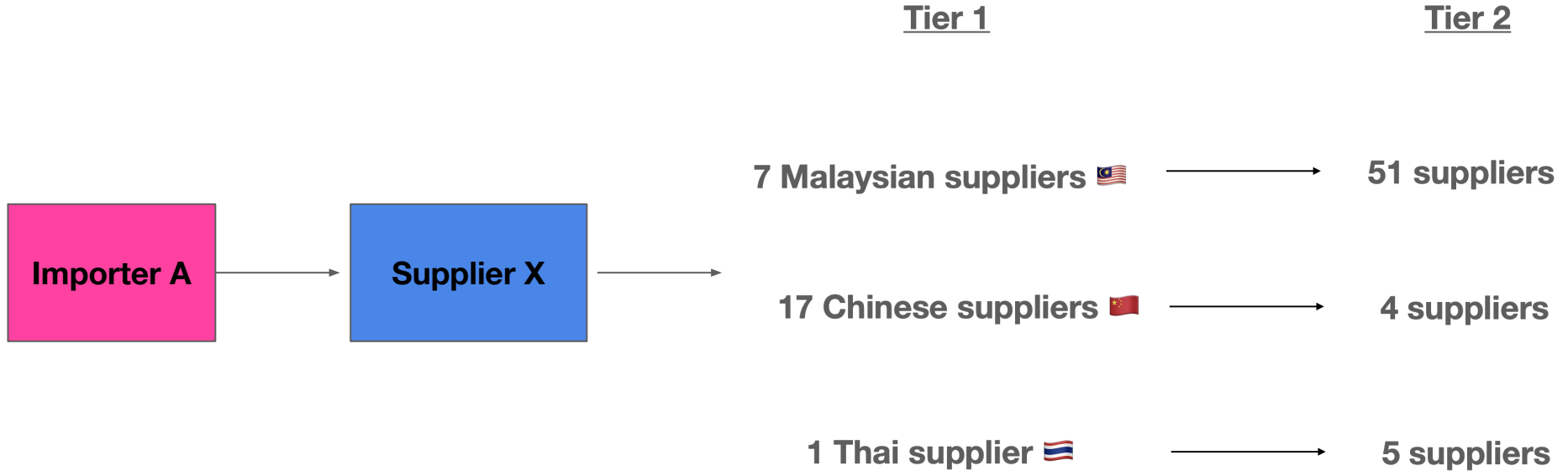


# Bendi's approach to analysing exposure to XUAR

1. Programmatically assessing datasets to identify any predetermined links
2. Cross referencing company information - company reports, websites, corporate filings, etc.
3. Analysis of "material flows" to assess likelihood (e.g. countries, locations, industries)
4. Human review

# Case study

# Mapping the supply chain

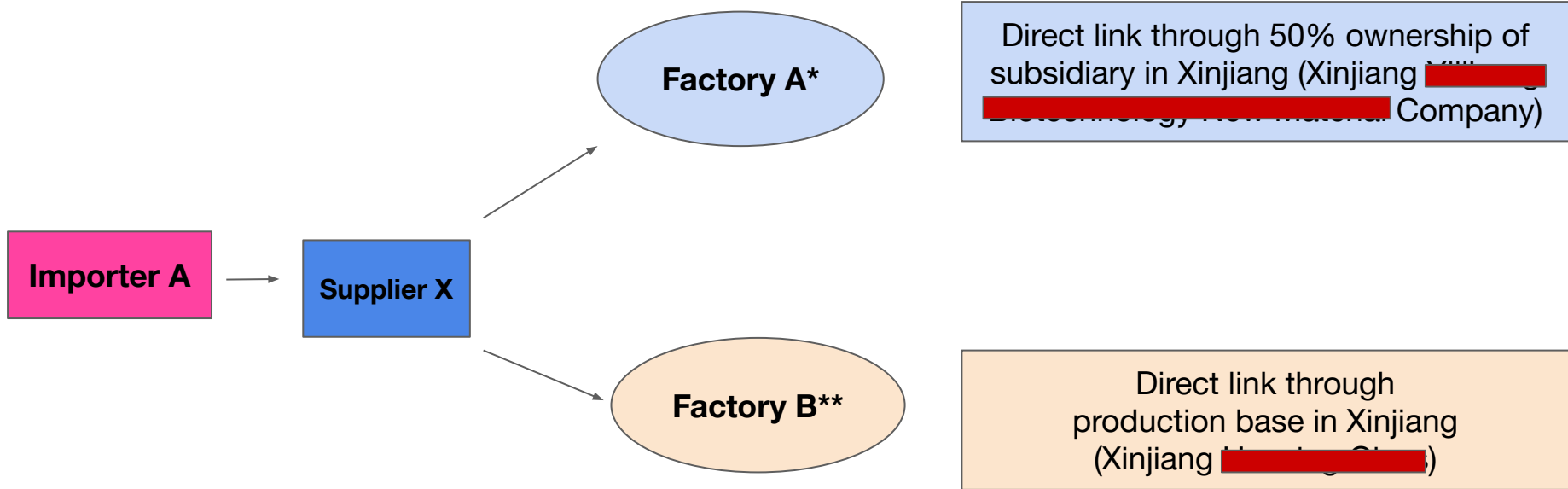


# **What is a direct link?**

# Evidence to infer “direct exposure”

1. Company has operations in Xinjiang
2. Company has 50%+ ownership of a subsidiary in Xinjiang
3. Company has direct Xinjiang development-related engagement

# Case study findings - direct exposure



\* Factory A = Contingency supplier, never used

\*\* Factory B = Not for UK products

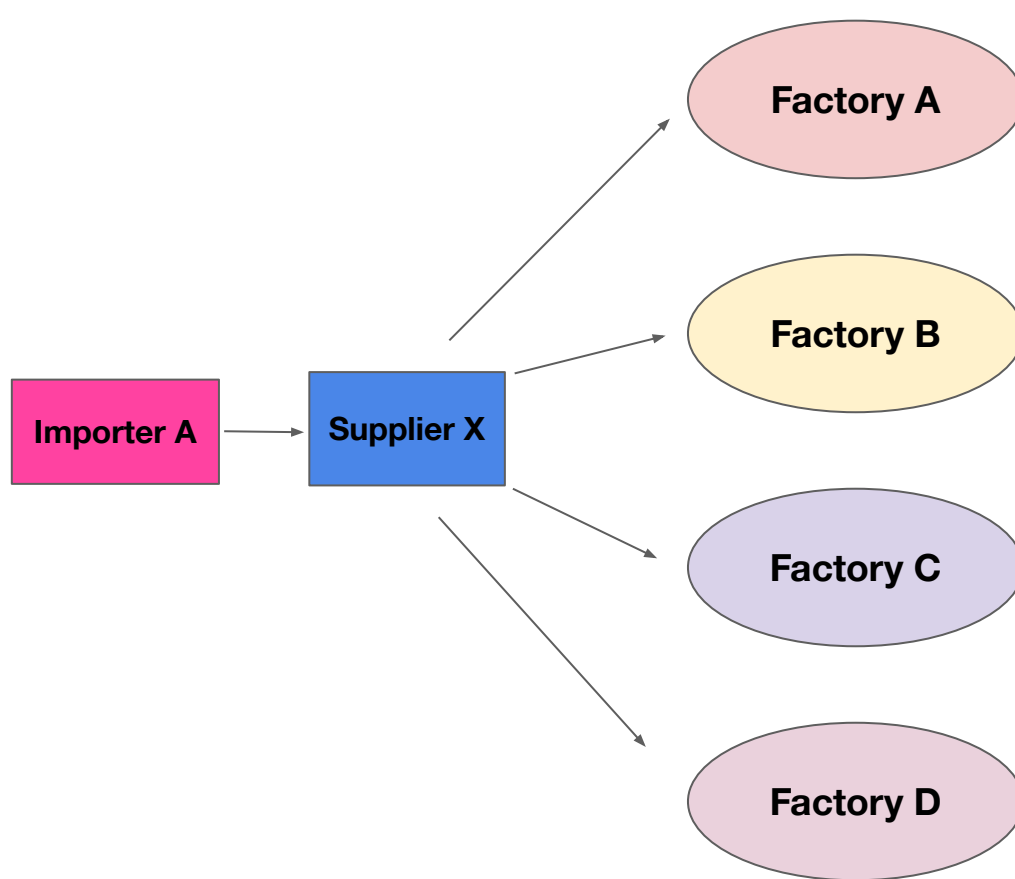
**What is an indirect link?**



# Evidence to infer “indirect exposure”

1. The common composition of Chinese company name  
⇒ Province/City+Company name + the product + Ltd
2. The composition of industry and connection between Xinjiang and other Chinese provinces eg. seafood in Shandong
3. Evidence of “labour transfer schemes” or province/city-level aid
4. Analysis of corporate ownership
5. Analysis of parent/group/sibling company relationships

# Case study findings - indirect exposure



Indirect link through parent company ([REDACTED]) alleged use of manufacturing plants in Xinjiang

Parent company ([REDACTED] Group) is state owned with 35% ownership of five Xinjiang subsidiaries

Parent company's holding company ([REDACTED]) also owns Xinjiang manufacturing plant

State-owned [REDACTED] Energy, linked to local gov led "industrial cooperation initiatives" with Xinjiang

# Horizon scanning

# Regulatory changes - the known

**19th November 2024**

## EU Adopts Ban on Products Made With Forced Labour

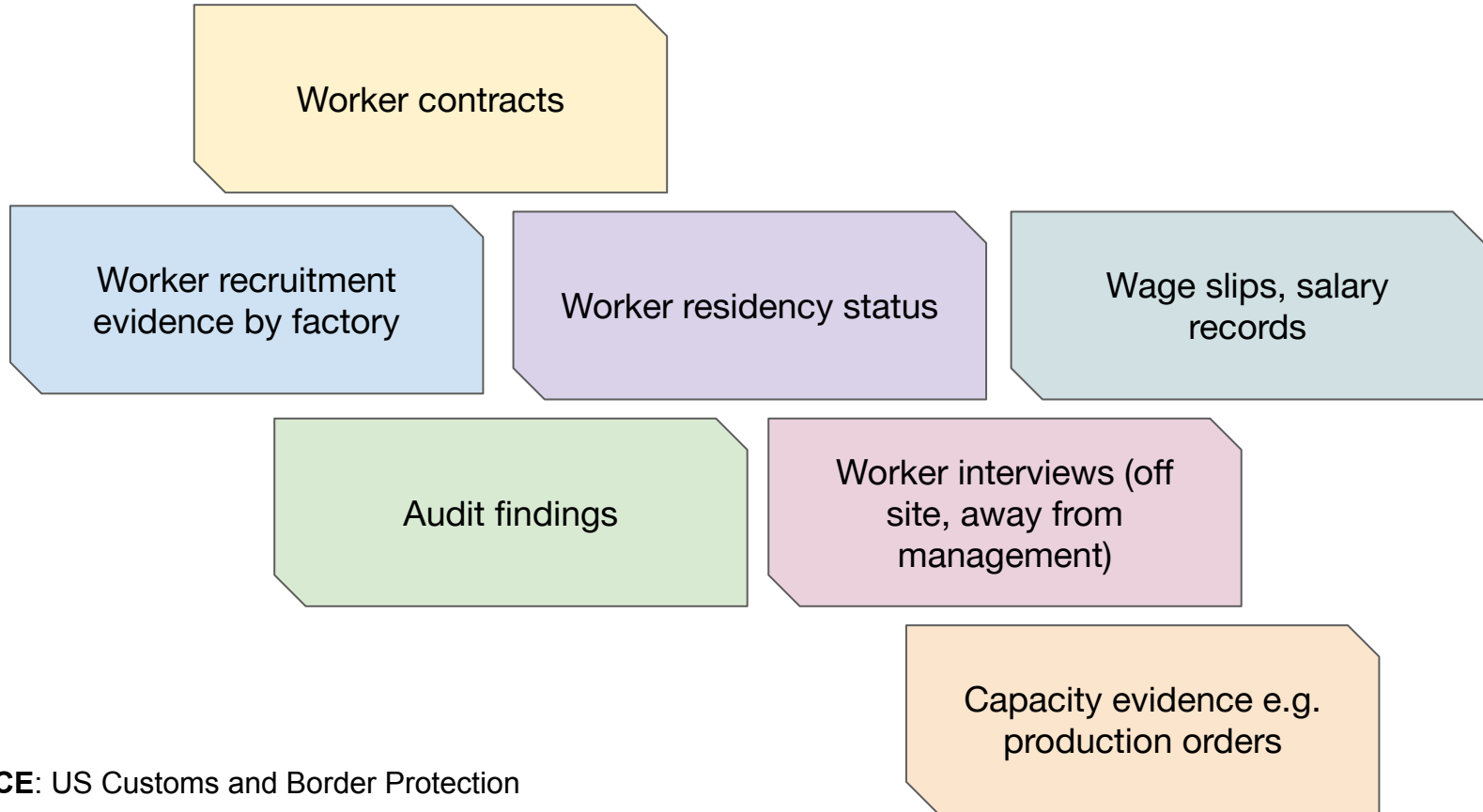
Notably, certain agricultural commodities associated with forced labour may be impacted by the new rules. The US government considers that Brazilian beef, sugarcane and coffee, Ivorian cocoa, Indonesian palm oil and Chinese fish –major imports by the EU - could have been produced under these practices.

**22 November 2024**

## US blacklists 29 more Chinese companies

**23 Entities in the Agricultural Sector:** The FLETF has identified 23 entities engaged in the production and sale of agricultural products, including tomato paste and tomato products, walnuts, red dates, raisins, and other products.

# Beyond technology - evidence gathering



**SOURCE:** US Customs and Border Protection

# Regulatory changes - the unknown

China warns Donald Trump over tariffs threat

**Cars to fruit: The goods set to get pricier under Trump's tariff plans**

**Will Trump's Tariffs Drive Down Forced Labor?**

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# Regulatory changes - the unknown



**UK's response to modern slavery has not kept up with the advances of other nations**

16 October 2024

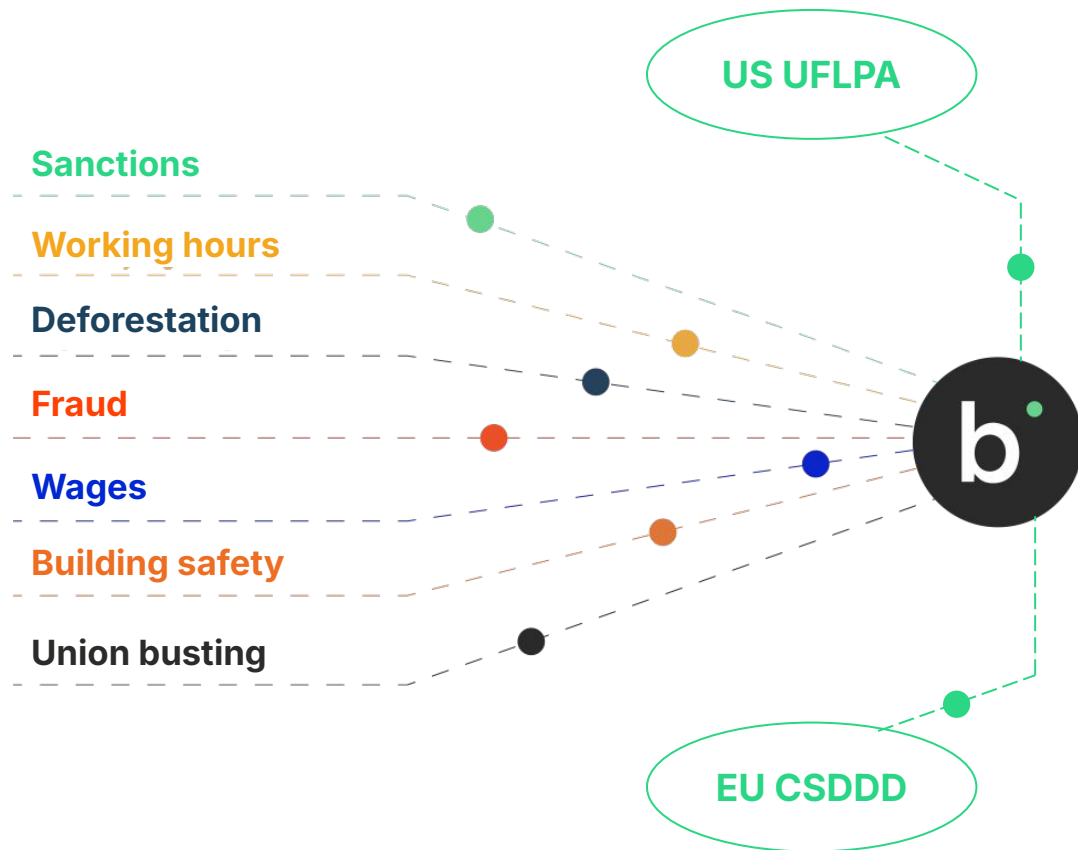
**UK House of Lords Select Committee calls for the introduction of mandatory human rights due diligence**

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06 NOVEMBER 2024



# Easier due diligence: 100+ indicators, 40+ languages





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**Thank you**

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