

## U.S. Capital Markets Footprint of Chinese Companies Sanctioned for XUAR Human Rights Violations

September 18, 2020

The U.S. Department of Commerce’s Bureau of Industry and Security (BIS) has added several dozen Chinese companies to the Entity List for “acting contrary to the foreign policy interests of the United States” and, more specifically, having been implicated in human rights violations and the implementation of mass arbitrary detention, high-technology and biometric surveillance, and forced labor against Uyghurs in the Xinjiang Uyghur Autonomous Region (XUAR) since the fall of 2019. This follows over three decades of sweeping security measures and assimilationist policies enacted by the Chinese government, aimed at repressing Uyghur religious belief and practice, and marginalizing Uyghur ethnic identity and culture.

- ❖ On July 22, 2020, the Commerce Department added eleven Chinese companies to the Entity List “in connection with the practice of forced labor involving Uyghurs and other Muslim minority groups” and “conducting genetic analyses used to further the repression of Uyghurs and other Muslim minorities” in the XUAR.<sup>1</sup>
- ❖ On May 22, 2020, the Commerce Department added eight Chinese companies and institutions to the Entity List for being “complicit in human rights violations and abuses,” mass arbitrary detention, and high-tech surveillance in the XUAR.<sup>2</sup>
- ❖ On October 9, 2019, the Commerce Department added 28 entities, including eight Chinese companies, to the Entity List for having been “implicated in human rights violations and abuses,” mass arbitrary detention, and high-tech surveillance in the XUAR.<sup>3</sup>

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<sup>1</sup> <https://www.commerce.gov/news/press-releases/2020/07/commerce-department-adds-eleven-chinese-entities-implicated-human>

<sup>2</sup> <https://www.commerce.gov/news/press-releases/2020/05/commerce-department-add-nine-chinese-entities-related-human-rights>

<sup>3</sup> <https://www.federalregister.gov/documents/2019/10/09/2019-22210/addition-of-certain-entities-to-the-entity-list>

## Publicly Traded Companies on the Entity List

Of these recent 47 additions to the Entity List, 16 are publicly traded on the Shanghai (SS), Shenzhen (SZ), and Hong Kong (HK) Stock Exchanges, either directly or through or their parent entities. Listed by most recent date of Entity List addition, these are:

### Hefei Meiling Co., Ltd. (000521.SZ)

- Meiling is a major home appliance manufacturer based in Hefei Economic and Technological Development Zone that produces refrigerators, freezers, air conditioners, and other home appliances, supplying overseas companies such as Electrolux. As of 2018, the company employed over 1,500 Uyghur workers that had been transferred from Xinjiang to Anhui province.<sup>4</sup> Hefei Meiling changed its name to Changhong Meiling Co., Ltd. in June 2018, but this change is not reflected in BIS documents.

### KTK Group Co., Ltd. (603680.SS)

- Subsidiary of CRRC Co., Ltd. (601766.SS) (01766.HK)
- KTK Group manufactures railway transportation supporting products including vehicle interiors, control systems, and rolling stock accessories for international customers including Alstom, Bombardier, and Siemens. It employs about a thousand workers that have been transferred from Xinjiang to its factories in Jiangsu.<sup>5</sup> Formerly known as Jiangsu Jianhu Rail Transit Equipment Co., Ltd.<sup>6</sup>

### Nanjing Synergy Textiles Co., Ltd.

- Subsidiary of Victory City International Holdings Ltd. (00539.HK)
- Nanjing Synergy Textiles produces and supplies cotton knitting yarns for yarn and fabric processing, using a number of workers from Xinjiang – including ethnic Kazakhs – that have been transferred to the company's Jiangsu factories.<sup>7</sup>

### Nanchang O-Film Tech Co., Ltd.

- Subsidiary of OFilm Group Co., Ltd (002456.SZ)

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<sup>4</sup> <http://archive.ph/wip/AAvOv>

<sup>5</sup> <http://www.xjnlk.gov.cn/info/1161/19344.htm>; <https://www.harderllp.com/wp-content/uploads/2020/04/Dkt-1-Complaint.pdf>

<sup>6</sup> <http://www.wjih.com/>

<sup>7</sup> <http://archive.ph/recum>

- O-Film Tech produces optoelectronics for end-use consumer goods such as electronics and smart vehicles. It employs over a thousand Uyghur workers transferred out of Xinjiang to its Jiangxu factories.<sup>8</sup> Uyghur and Kazakh workers are reportedly subject to coercive labor practices and make touch screens and fingerprint recognition scanners for international tech companies like Apple, Samsung, Lenovo, and Huawei.<sup>9</sup>

Jiangsu Tanyuan Technology Co. Ltd. (603133.SS)

- Tanyuan Technology is a primary supplier of graphite heat dissipation materials used in touch screens for consumer electronics and vehicles, using at least 250 Uyghur workers transferred from Xinjiang to Jiangsu.<sup>10</sup>

Xinjiang Silk Road BGI Co., Ltd.

- Subsidiary of BGI Genomics Co., Ltd. (300676.SZ)
- According to BGI Genomics, which provides DNA sequencing and biomedical services, Xinjiang Silk Road BGI has not been active since its establishment in November 2016.<sup>11</sup>

Beijing Liuhe BGI Co., Ltd.

- Subsidiary of BGI Genomics Co., Ltd. (300676.SZ)
- Beijing Liuhe BGI provides commercial DNA sequencing services for disease-related scientific research, and has been involved in studies of Uyghur genetic information.<sup>12</sup>

Aksu Huafu Textiles Co., Ltd.

- Subsidiary of Huafu Fashion Co., Ltd. (002042.SZ)
- Aksu Huafu Textiles produces mélangé yarn out of Aksu Textile Industrial City. Huafu Fashion is the world's largest supplier of mélangé yarn. The company operates a vocational training program in cooperation with the government that feeds workers to its factories and mills, and has been identified as a forced labor pipeline.<sup>13</sup>

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<sup>8</sup> <http://archive.ph/qEvOK>

<sup>9</sup> <https://abcnews.go.com/Business/wireStory/gadgets-tech-giants-made-coerced-uyghur-labor-69450269>

<sup>10</sup> <http://archive.ph/hRVKq>

<sup>11</sup> <https://www.bgi.com/us/company/news/statement-regarding-bgis-subsidiaries-being-added-to-uss-entity-list/>

<sup>12</sup> <https://www.bgi.com/us/company/news/statement-regarding-bgis-subsidiaries-being-added-to-uss-entity-list/>; <https://www.axios.com/chinese-coronavirus-test-maker-agreed-to-build-a-xinjiang-gene-bank-f82b6918-d6c5-45f9-90b8-dad3341d6a6e.html>

<sup>13</sup> <https://www.wsj.com/articles/western-companies-get-tangled-in-chinas-muslim-clampdown-11558017472>; [http://www.chinadaily.com.cn/a/201808/14/WS5b72a6a1a310add14f385ba2\\_4.html](http://www.chinadaily.com.cn/a/201808/14/WS5b72a6a1a310add14f385ba2_4.html)

FiberHome Telecommunication Technologies Co., Ltd. (600498.SS)

- Fiberhome operates a strategic base in Xinjiang and has a strategic cooperation agreement with the Xinjiang Production and Construction Corps (XPCC) to build smart cities equipped with surveillance technology. XPCC is a ubiquitous paramilitary organization that has also been added to the Entity List for its involvement building detention centers and facilitating forced labor programs in the XUAR.<sup>14</sup>

Nanjing FiberHome Starrysky Communication Development Co., Ltd.

- Subsidiary of FiberHome (600498.SS)
- Starrysky produces network security and big data software, including a smart policing mobile application used by Chinese border authorities to extract personal data from the smartphones of travelers entering Xinjiang and scan for religious content.<sup>15</sup>

Dongfang Netpower Technology Co., Ltd. aka NetPosa (300367.SZ)

- NetPosa is the parent company of SenseNet, which supplies China's Skynet Project surveillance system with facial recognition tracking services across public spaces in Xinjiang. The company's chairman serves on a Ministry of Public Security committee that sets national security technology standards.

Shenzhen Shenwang Vision Technology Co., Ltd. (SenseNet)

- Subsidiary of NetPosa Technologies Ltd. (300367.SZ)
- SenseNet is a joint venture between NetPosa and SenseTime Group that supplies China's Skynet Project with facial recognition tracking services across public spaces in Xinjiang.

Zhejiang Dahua Technology Co., Ltd. (002236.SZ)

- Dahua Technology provides video surveillance products and services used in machine vision, video conferencing, professional drones, and RFID systems. It has received over a billion dollars in contracts for video surveillance and security projects in the XUAR, including facial recognition and data storage systems.<sup>16</sup>

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<sup>14</sup> [http://news.cnr.cn/native/gd/20180814/t20180814\\_524331653.shtml](http://news.cnr.cn/native/gd/20180814/t20180814_524331653.shtml)

<sup>15</sup> <https://www.nytimes.com/2019/07/02/technology/china-xinjiang-app.html>

<sup>16</sup> [http://www.its114.com/html/2017/changshangyaowen\\_0217/84407.html](http://www.its114.com/html/2017/changshangyaowen_0217/84407.html); <https://ipvm.com/reports/xinjiang-dahua-hikvision/>

Hangzhou Hikvision Digital Technology Co., Ltd. (002415.SZ)

- Hikvision is one of the world's largest manufacturers of video surveillance products, with a full line including CCTV cameras, DVRs, and video management software. It has equipped several detention facilities in Xinjiang and won hundreds of millions of dollars worth of security contracts in the region. Hikvision also operates a research center in Xinjiang and has worked on Uyghur-specific AI image and video projects at a paramilitary base in Urumqi.<sup>17</sup>

Iflytek Co., Ltd. (002230.SZ)

- Iflytek (stylizes as iFlytek) produces speech recognition software and products, including the first AI open platform for smart hardware developers in China. It has supplied voiceprint collection systems to Kashgar police in Xinjiang and partnered with the Xinjiang Public Security Bureau and with telecommunications companies to integrate voice pattern data into surveillance systems.<sup>18</sup>

Xiamen Meiya Pico Information Co. Ltd. (300188.SZ)

- Meiya Pico produces digital forensics and cybersecurity products and services, including technology to detect Uyghur and Islamic symbols in photos, an app reportedly used by police to extract smartphone data from individuals, and a range of drones.<sup>19</sup> It has provided the Xinjiang Police College with drone flight training for reconnaissance and patrol assignments, and is working with the Xinjiang Public Security Bureau's cybersecurity corps to build a cybersecurity training base.<sup>20</sup>

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<sup>17</sup> <https://ipvm.com/reports/hik-xj-pap>

<sup>18</sup> <https://www.reuters.com/article/us-china-xinjiang-mit-tech-insight/risky-partner-top-u-s-universities-took-funds-from-chinese-firm-tied-to-xinjiang-security-idUSKCN1TE04M>; <https://www.hrw.org/news/2017/10/22/china-voice-biometric-collection-threatens-privacy>

<sup>19</sup> <https://www.scmp.com/tech/start-ups/article/3017688/what-you-need-know-about-meiya-pico-chinas-low-profile-forensics>; <https://www.rfa.org/mandarin/yataibaodao/shaoshuminzu/hc-11272018150156.html>

<sup>20</sup> <http://www.xjpcedu.cn/info/1161/1864.htm>; <http://stock.jrj.com.cn/2018/08/10000024944213.shtml>

## Companies on the Entity List Considering IPOs

Chinese companies on the Entity List that are not publicly traded, but have recently considered and postponed or withdrawn IPOs:

### Guangzhou CloudWalk Information Technology Co., Ltd.

- Cloudwalk has sold its facial recognition platform to police stations across China, purportedly equipped with the ability to distinguish “sensitive groups” of people, such as Uyghurs, from the Han majority.<sup>21</sup>
- Unlike other prominent AI companies in China, Cloudwalk is backed entirely by RMB-based funds and most its investors are state-owned.<sup>22</sup> It underwent a shareholding system reform affecting registered capital and shareholding structure in early 2020, completed by mid-May, seemingly confirming rumors of the company’s plans for an IPO on Shanghai’s new Nasdaq-style technology stock exchange, Star Market, by the end of 2020.<sup>23</sup> Cloudwalk was added to the Entity List in June 2020. It has declined to comment on the IPO plans, which appear to have stalled.<sup>24</sup>

### Megvii Technology Co., Ltd.

- Megvii Technology designs facial recognition software and hardware using AI technology. It created an online facial recognition platform known as Face++ that was identified as a component of the Integrated Joint Operations Platform used by police and other authorities in Xinjiang for mass surveillance purposes, but reportedly “inoperable” and never actually used.<sup>25</sup>
- Reports from February 2020 indicated that Megvii Technology was planning to refile for a Hong Kong IPO following the lapse of its previous application, filed six months earlier, due to the impact of the coronavirus epidemic and Megvii’s inclusion in the Entity List in October 2019. At the time, Megvii was expected to refile as soon as the end of March, when

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<sup>21</sup> <https://www.nytimes.com/2019/04/14/technology/china-surveillance-artificial-intelligence-racial-profiling.html>

<sup>22</sup> <https://equalocean.com/news/2020051313976>

<sup>23</sup> <https://www.chinamoneynetwork.com/2020/05/14/chinese-ai-unicorn-cloudwalk-raises-253m-accelerates-ipo-schedule>; <https://www.biometricupdate.com/202005/cloudwalk-raises-250m-and-plans-ipo-as-biometrics-firms-flourish-in-china-during-pandemic-response>

<sup>24</sup> <https://equalocean.com/news/2020051313976>

<sup>25</sup> <https://www.scmp.com/tech/start-ups/article/3013229/ai-unicorn-megvii-not-behind-app-used-surveillance-xinjiang-says>

Deloitte finished auditing the company's 2019 financials.<sup>26</sup> As of August 2020, Megvii has not yet refiled for an IPO.

SenseTime Group Ltd.

- SenseTime developed the facial detection platform SenseFace, which is used by local public security agencies across China, including Xinjiang. The company also installed the first prison facial recognition system in Hohhot, Inner Mongolia.<sup>27</sup> It has since sold its stake in the smart policing joint venture set up with Leon Technology in 2017, known as Tangli Technology.<sup>28</sup>
- SenseTime decided in March 2020 to postpone its plans for an IPO in Hong Kong following its inclusion on the Entity List in October 2019. The decision was likely also affected by the coronavirus-induced global economic disruption. SenseTime has declined to comment on its fundraising plans.<sup>29</sup>

Shanghai Yitu Network Technology Co., Ltd.

- Yitu Technology provides facial recognition software to police stations that enable them to generate databases identifying Uyghur residents by ethnic profile.<sup>30</sup>
- According to reports from September 2019, Yitu Technology was at the time considering an IPO on Shanghai's new technology stock exchange, Star Market, within the next year.<sup>31</sup> At the time, the company clarified that there was no IPO plan at present although it was actively evaluating various opportunities.<sup>32</sup> It was added to the Entity List in October 2019.

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<sup>26</sup> <https://www.reuters.com/article/megvii-ipo/chinese-ai-firm-megvii-to-refile-for-hong-kong-ipo-sources-idUSL4N2AL2VJ>

<sup>27</sup> [http://www.sohu.com/a/217203765\\_99963310](http://www.sohu.com/a/217203765_99963310)

<sup>28</sup> <https://www.ft.com/content/38aa038a-5f4f-11e9-b285-3acd5d43599e>

<sup>29</sup> [http://www.securitychina.com.cn/English/2018blh/Exhibitors\\_Detail.asp?NF=2016&ID=4368;](http://www.securitychina.com.cn/English/2018blh/Exhibitors_Detail.asp?NF=2016&ID=4368;)  
<https://asia.nikkei.com/Business/China-tech/SenseTime-to-seek-up-to-1bn-private-funding-deferring-Hong-Kong-IPO>

<sup>30</sup> <https://www.nytimes.com/2019/04/14/technology/china-surveillance-artificial-intelligence-racial-profiling.html>

<sup>31</sup> [https://www.biometricupdate.com/202001/yitu-wins-shanghai-government-contract-and-considers-ipo-on-citys-new-exchange;](https://www.biometricupdate.com/202001/yitu-wins-shanghai-government-contract-and-considers-ipo-on-citys-new-exchange) <https://www.bloomberg.com/news/articles/2019-09-03/ai-startup-yitu-is-said-to-seek-ipo-on-china-s-new-tech-board>

<sup>32</sup> <https://equalocean.com/news/2019090411654>

## Publicly Traded Companies Not on the Entity List

Chinese companies that allegedly employ Uyghur workers through forced labor and training programs in the XUAR, and supply surveillance and data technology to implement mass surveillance and detention programs in the XUAR, that are publicly traded but have not been added to the Entity List or other U.S. sanctions regimes:

### [Suzhou Good-Ark Electronics Co., Ltd. \(002079.SZ\)](#)

- Good-Ark Electronics manufactures semiconductor products sold in China and in other countries. According to a 2017 agreement, Good-Ark agreed to employ 500 Uyghur workers following their completion of an education and training program that has been characterized as a detention and indoctrination program.<sup>33</sup> As of 2019, the company's Shandong factory employed a number of Uyghurs that had been transferred from Xinjiang.<sup>34</sup>

### [Shandong Ruyi Woolen Garment Group Co., Ltd. \(002193.SZ\)](#)

- Ruyi Group is the largest textile manufacturer in China and has ownership stakes in major international brands like Bally and SMCP (which owns Sandro, Maje, and Claude Pierlot). It reportedly employs 2,000 Uyghur workers across three countries in Xinjiang and has production links to several villages and households.<sup>35</sup> The company is also known as Shandong Ruyi Technology Group.

### [Jiangsu Guotai Guosheng Co. Ltd.](#)

- Subsidiary of Jiangsu Guotai International Group (002091.SZ)
- Jiangsu Guotai is a clothing and textile producer that supplies a number of international brands, including Abercrombie & Fitch, American Eagle, Target, Tommy Hilfiger, Costco, DKNY, Macy's, Kohl's, and Walmart. A satellite factory of Shandong Zoucheng Guosheng reportedly employs over 3,500 Uyghurs, making it one of the largest beneficiaries of the forced labor and training program in the XUAR.<sup>36</sup>

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<sup>33</sup> <http://archive.ph/3e0G3>; <https://www.harderllp.com/wp-content/uploads/2020/04/Dkt-1-Complaint.pdf>

<sup>34</sup> <http://archive.ph/jXzgL>

<sup>35</sup> <http://archive.ph/q9VgW>; <http://archive.ph/73ip1>

<sup>36</sup> <http://archive.ph/q9VgW>



Avary Holding (Shenzhen) Co., Ltd. (002938:SZ)

- Avary Holdings designs and manufactures printed circuit boards used in various communications, computing, and consumer electronic products. It employs about 111 Uyghurs at its Jiangsu factory that were transferred from Xinjiang, and has participated in programs seeking additional Uyghur labor transfers.<sup>37</sup>

SAIC Motor Corporation Ltd. (600104.SS)

- SAIC's luxury car brand Roewe Group, which sells domestic vehicles overseas under the British MG Motor brand, employs rural laborers from Xinjiang at its Jiangsu factory.<sup>38</sup>

Haoxiangni Health Food Co., Ltd. (002582.SS)

- Formerly known as Haoxiangni Jujube, the company produces dried jujube (Chinese date) and other food products using Uyghur labor at factories in both Henan province and the XUAR.<sup>39</sup>

Youngor Textile Holdings Co., Ltd.

- Subsidiary of Youngor Group Co. Ltd. (600177.SS)
- Along with various subsidiaries that also operate in Xinjiang, Youngor produces textiles and textile machinery for several international brands including Calvin Klein, Gap, Lacoste, LL Bean, and Uniqlo. Over 2,000 Uyghur workers had been transferred from Xinjiang to Youngor factories in Anhui province, and the company has expressed interest in employing additional workers from the XUAR.<sup>40</sup>

Suzhou Keda Technology Co., Ltd. aka Kedacom (603660.SS)

- Kedacom manufactures video conferencing, surveillance, and analytics technology, and has developed a platform for the Xinjiang Public Security Department's Safe City Network, connecting cities and districts across the XUAR.<sup>41</sup> Kedacom also worked with an unspecified Xinjiang detention center to set up an integrated security management system with video surveillance and digital interrogation capabilities.<sup>42</sup>

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<sup>37</sup> <http://archive.ph/L5G9i>

<sup>38</sup> <http://archive.ph/lhdVC>

<sup>39</sup> <http://archive.ph/RZhne>

<sup>40</sup> <http://archive.ph/jsyEC>

<sup>41</sup> <http://data.eastmoney.com/notices/detail/603660/AN201512280012506620,JUU4IThCIThGIUU1JUI3ITIFIUU3JUE3ITkxJUU4IUIFIUIF.html>

<sup>42</sup> <https://www.kedacom.com/cn/newskd/4035.jhtml>

Tongfang RIA Co., Ltd.

- Subsidiary of Tsinghua Tongfang Co., Ltd. (600100.SS)
- Tongfang RIA supplies IC card and RFID technology for products including electronic reader machines and access control systems. The Aksu detention center in Xinjiang uses Tongfang RIA technology for its high-security key cards, gate management, and prison access control system.<sup>43</sup>

Leon Technology Co., Ltd. (300603.SZ)

- Leon Technology provides security system and communications network engineering and services, and primarily operates in Xinjiang. Past projects include implementing China Mobile's smart technology data system across the XUAR that encompasses education, healthcare, digital payments, transportation, and governance, and China Mobile's cloud computing data center project in Karamay.<sup>44</sup> Leon Technology also set up a smart policing joint venture with SenseTime Group in 2017, known as Tangli Technology.<sup>45</sup>

## Presence in Major U.S. Indexes and ETFs

On May 14, 2018, after three years of deliberation and negotiations with Chinese regulatory authorities – and reportedly, considerable arm-twisting by Beijing<sup>46</sup> – global index provider Morgan Stanley Capital International (MSCI) released a list of large-cap China A Shares (stocks of Chinese companies traded on the Shanghai and Shenzhen Stock Exchanges) to be included in its MSCI China Index, Emerging Markets (EM) Index, and All Country World Index (ACWI) beginning on June 1, 2018.<sup>47</sup> Previously, only Chinese companies listed in Hong Kong as H Shares or in the United States were included in MSCI indexes.

Following MSCI, FTSE Russell was the second major index provider to include China A Shares in its indexes. On June 24, 2019, FTSE added 1,097 China A Shares into its FTSE Global Equity Index Series (GEIS, which covers the FTSE Emerging and All-World Indexes) in the first stage of inclusion (20%), drawing an expected \$10 billion from U.S. passive investors.

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<sup>43</sup> <http://www.thtfria.com.cn/index.php?c=content&a=show&id=180>

<sup>44</sup> <https://www.msbcsc.com/viewnews-2277480.html>; <http://www.3snews.net/smartcity/260000035951.html>

<sup>45</sup> <https://www.ft.com/content/38aa038a-5f4f-11e9-b285-3acd5d43599e>

<sup>46</sup> <https://www.wsj.com/articles/how-china-pressured-msci-to-add-its-market-to-major-benchmark-11549195201>

<sup>47</sup> The MSCI China Index represents the Chinese securities in the MSCI Emerging Markets and MSCI ACWI.

Exchange-traded fund (ETF) products are passively managed, tracking specific stock market indexes that measure the performance of a fixed set of securities:

- ❖ MSCI Emerging Markets (EM) Index  
Benchmark for BlackRock’s iShares MSCI EM ETF
- ❖ MSCI EM Investable Market Index (IMI)  
Benchmark for BlackRock’s iShares Core MSCI Emerging Markets ETF
- ❖ MSCI All Country World International (ACWI) Index  
Benchmark for BlackRock’s iShares MSCI ACWI ETF
- ❖ MSCI ACWI ex-U.S. Index  
Benchmark for BlackRock’s iShares MSCI ACWI ex.-U.S. ETF
- ❖ FTSE Emerging Index  
Benchmark for the Vanguard FTSE Emerging Markets UCITS ETF
- ❖ FTSE All-World Index  
Benchmark for the Vanguard FTSE All-World UCITS ETF

### Companies on the Entity List

Security Name	MSCI EM Index	MSCI EM IMI Index	MSCI ACWI Index	MSCI ACWI ex-U.S. Index	FTSE Emerging Index	FTSE All-World Index
Hefei Meiling (A)						
KTK Group (A)						
CRRC (A)					X	X
CRRC (H)					X	X
Victory City (H)						
OFilm Group (A)					X	X
Tanyuan Tech (A)						

BGI Genomics (A)	X				X	X
Huafu Fashion (A)						
Fiberhome (A)	X				X	X
NetPosa (A)						
Dahua Technology (A)	X				X	X
Hikvision (A)	X		X	X	X	X
Iflytek (A)	X				X	X
Meiya Pico (A)					X	X

#### Companies Not on the Entity List

Security Name	MSCI EM Index	MSCI EM IMI Index	MSCI ACWI Index	MSCI ACWI ex-U.S. Index	FTSE Emerging Index	FTSE All-World Index
Good-Ark (A)						
Shandong Ruyi (A)						
Jiangsu Guotai (A)					X	X
Avary Holding (A)					X	X
SAIC Motor (A)	X	X	X	X	X	X
Haoliangni Food (A)						
Youngor Group (A)					X	X
Kedacom (A)						
Tsinghua Tongfang (A)					X	X
Leon Technology (A)						

## Presence in U.S. Public Pension Funds

The savings of tens of millions of Americans across state lines are invested in Chinese companies through some of the largest retirement and public pension systems in the country. These include both active investments selected by fund managers and passive investments in indexes and related funds, the constituents of which some state administrators may be unaware of. The charts below present at least a glimpse or sample of Chinese companies complicit in human rights abuses in the XUAR that are held by four of the largest state-sponsored public pension systems: California Public Employees’ System (CalPERS), New York State Teachers’ Retirement System (NYSTRS), Florida Retirement System (FRS) Pension Plan, and Texas Teachers’ Retirement System (TRS).<sup>48</sup>

### California Public Employees’ Retirement System (CalPERS)

#### *Companies on the Entity List*

Security Name	Shares	Market Value
CRRC (A)	64,400	\$75,855
CRRC (H)	8,325,626	\$6,958,891
OFilm Group (A)	7,000	\$7,990
BGI Genomics (A)	700	\$5,813
Huafu Fashion (A)	24,400	\$25,792
Fiberhome (A)	22,600	\$91,673
NetPosa (A)	14,700	\$21,124
Dahua Technology (A)	8,000	\$16,912
Hikvision (A)	24,800	\$99,586
Iflytek (A)	5,500	\$26,618

<sup>48</sup> CalPERS data is from the FY2019 report; NYSCRF data is from an asset list dated March 31, 2019; FRS Pension Plan data is from a Q2 2020 document, and Texas TRS data is from a July 31, 2020 report.

Meiya Pico (A)	2,100	\$5,452
iShares MSCI EM ETF	778	\$33,384
iShares Core MSCI EM ETF	87,729	\$4,512,780

California Public Employees' Retirement System (CalPERS)

*Companies Not on the Entity List*

Security Name	Shares	Market Value
Jiangsu Guotai (A)	25,100	\$20,867
SAIC Motor (A)	25,700	\$95,417

New York State Common Retirement Fund (NYSCRF)

*Companies on the Entity List*

Security Name	Shares	Market Value
CRRC (A)	397,018	\$312,604
CRRC (H)	1,514,512	\$638,989
BGI Genomics (A)	192,300	\$4,238,206
Dahua Technology (A)	62,800	\$170,536
Hikvision (A)	196,002	\$840,907
Iflytek (A)	46,100	\$243,921
iShares MSCI China A ETF	113,970	\$3,601,452

New York State Common Retirement Fund (NYSCRF)

*Companies Not on the Entity List*

Security Name	Shares	Market Value
Avary Holding (A)	220,600	\$1,561,080
SAIC Motor (A)	127,083	\$305,218

Florida Retirement System (FRS) Pension Plan

*Companies on the Entity List*

Security Name	Shares	Market Value
CRRC	692,000	\$305,153.73
CRRC	1,190,600	\$937,453.81
Ofilm Group (A)	45,600	\$118,542.85
BGI Genomics (A)	28,100	\$619,311.43
Hikvision (A)	2,782,500	\$11,937,755.29

Florida Retirement System (FRS) Pension Plan

*Companies Not on the Entity List*

Security Name	Shares	Market Value
Jiangsu Guotai	496,400	\$424,537.40
Jiangsu Guotai	393,795	\$336,786.27
SAIC Motor (A)	774,187	\$1,859,379.58
Kedacom (A)	31,500	\$40,832.76

Teacher Retirement System (TRS) of Texas

*Companies on the Entity List*

Security Name	Shares/Par Value
CRRC (A)	32,800
CRRC (H)	100,123
Zhuzhou CRRC Times Electric (H) <sup>49</sup>	12,776
Ofilm Group (A)	3,700
BGI Genomics (A)	500
Fiberhome (A)	1,600
Dahua Technology (A)	3,437,181
Hikvision (A)	12,500
Iflytek (A)	3,000
iShares MSCI EM ETF	1,000
Vanguard FTSE EM ETF	1,000,000

Teacher Retirement System (TRS) of Texas

*Companies Not on the Entity List*

Security Name	Shares/Par Value
SAIC Motor (A)	10,500
Youngnor Group (A)	6,600

<sup>49</sup> Subsidiary company under CRRC Corp. Ltd., affiliate of Roewe.



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