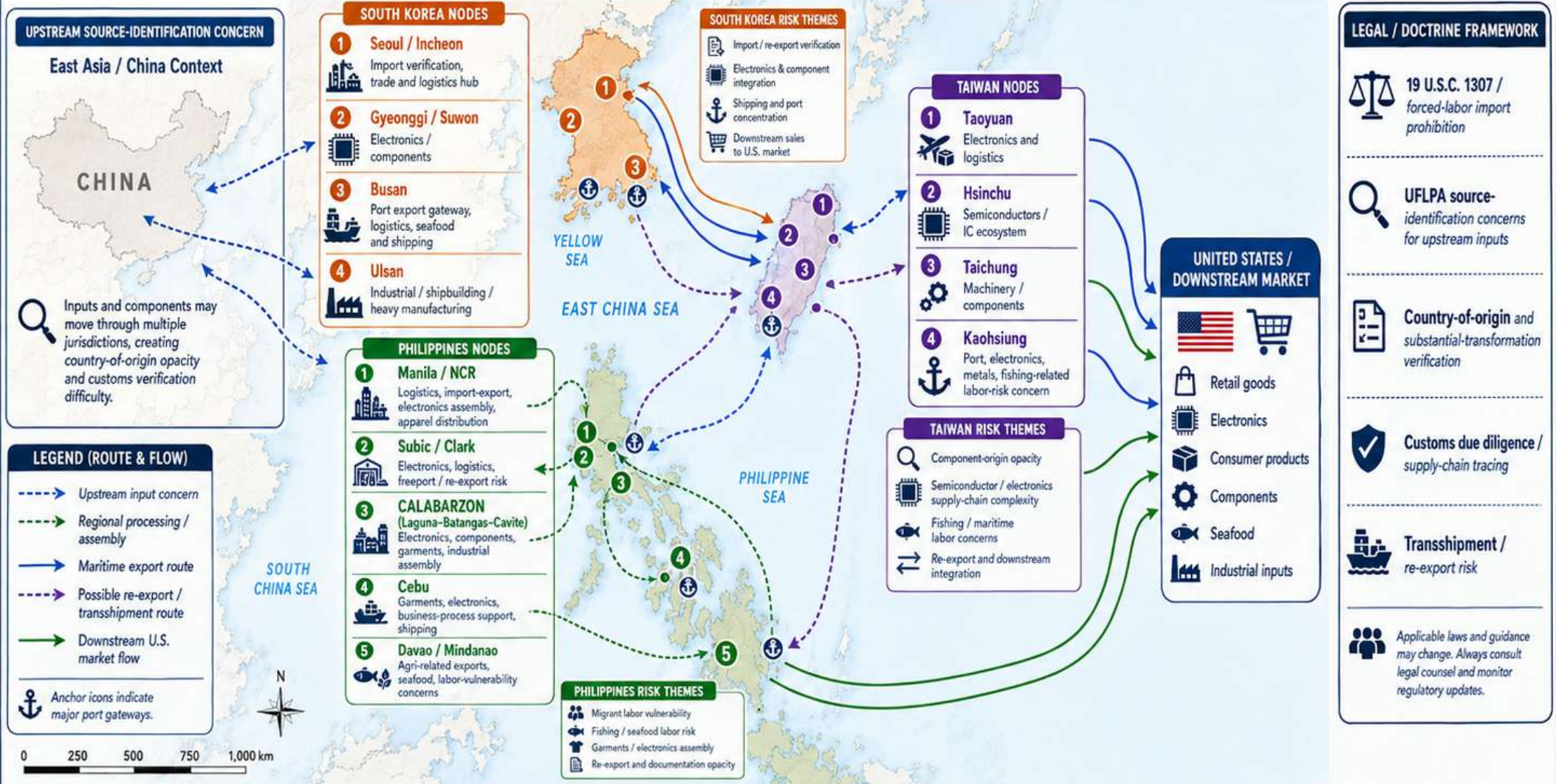


Philippines, Taiwan, and South Korea: Labor-Risk / Transshipment / Export-to-U.S. Map

Indicative risk assessment based on public reporting, supply-chain doctrine, and source-identification concerns.



DISCLAIMER: This map is an indicative risk assessment based on public reporting and supply-chain doctrine. It is not a definitive legal finding against every company, shipment, or location shown.

Date: May 17, 2025

Xinjiang to Asia-Pacific: Documented Forced-Labor / Transshipment Doctrine Map

How upstream risk may move through Pakistan, India, Taiwan, the Philippines, Japan, and onward markets

INDICATIVE MAP
Risk Pathways Shown
Not Definitive

TOP RISK THEMES

- upstream forced-labor input risk
- third-country assembly
- component-origin opacity
- transshipment / re-export
- downstream market distribution

LEGAL / ENFORCEMENT HOOKS

- UFLPA / 19 U.S.C. 1307
- country-of-origin verification
- anti-circumvention and duty-evasion concern
- customs source-identification difficulty

ILLUSTRATIVE PRODUCT CATEGORIES

- cotton / textiles
- solar inputs / polysilicon
- aluminum / industrial inputs
- electronics components
- garments and consumer goods

**SOURCE REGION
XINJIANG / XUAR**

- Upstream inputs and raw materials
- Labor, energy, industrial parks
- Agricultural and mineral inputs
- Manufacturing intermediates

CHINA COASTAL HUBS

- Shanghai (Yangshan Port)
- Ningbo (Zhoushan Port)
- Shenzhen (Yantian Port)
- Hong Kong (Port of Hong Kong)

CORRIDOR STATES / TERRITORIES

PAKISTAN	INDIA
5 Khunjerab Pass (Border Crossing)	9 Noida (NCR / Industrial)
6 Faisalabad (Industrial Zone)	10 Gujarat / Mundra (Port / SEZ)
Karachi (Port)	11 Mumbai (Nhava Sheva Port)
Gwadar (Port)	12 Chennai (Port)

JAPAN

- 21 Tokyo / Yokohama (Port)
- 22 Osaka / Kobe (Port)
- 23 Nagoya (Port)

TAIWAN

- 24 Taoyuan (Intl. Airport / Port)
- 25 Hsinchu (Science Park)
- 26 Kaohsiung (Port)

PHILIPPINES

- 27 Manila (Port)
- 28 Laguna-Batangas / CALABARZON (Industrial Zone)
- 29 Cebu (Port / Mactan)

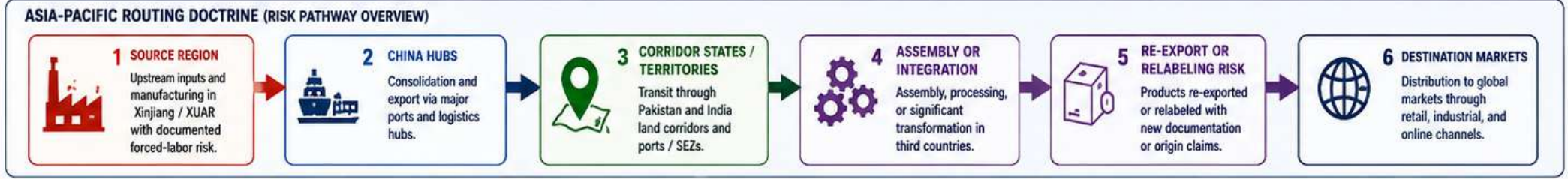
GLOBAL MARKETS / DOWNSTREAM DESTINATIONS

- North America
- European Union
- Middle East
- Southeast Asia
- Africa
- Latin America
- Oceania

Via wholesalers, distributors, e-commerce platforms, and brand supply chains.

LEGEND (ARROW MEANINGS)

- Upstream supply flow / documented route
- Maritime export lane (direct)
- Maritime export lane (transshipment / indirect)
- Overland / corridor route (possible)
- Re-export or relabeling risk flow
- Global continuation to downstream markets
- Source region
- China hub (port / export node)
- Corridor state / territory node
- Assembly / integration or re-export node
- Downstream market (global destinations)



DISCLAIMER: This map is an indicative, public-reporting-based summary of risk pathways and possible routes. It does not constitute a definitive legal finding or proof of wrongdoing for any node, company, or shipment. Information is subject to change as additional data becomes available.

NOTES

- Routes shown are illustrative, not exhaustive.
- Absence of a route does not indicate absence of risk.

Date: May 17, 2025
For informational use only

Philippines, Taiwan, and Japan: East Asia Forced-Labor / Transshipment Risk Map

Maritime routing, component-origin opacity, and customs verification risk



RISK THEMES

- Component-origin opacity**
Difficulty verifying true origin of inputs and components.
- Electronics and smart-device supply-chain verification**
Complex multi-tier suppliers and opaque subcomponents.
- Textile / garment input tracing**
High risk of Xinjiang-linked cotton and textile inputs.
- Maritime transshipment and re-export**
Use of intermediate ports and free zones to obscure origin.
- Downstream assembly and relabeling risk**
Assembly, kitting, or relabeling may mask origin and transshipment.

LAW / DOCTRINE REFERENCE

- UFLPA / 19 U.S.C. 1307**
Presumption against goods mined, produced, or manufactured wholly or in part in Xinjiang.
- Country-of-origin disputes**
Complex rules of origin and advanced manufacturing obscure true origin.
- Supply-chain due diligence**
Expectation of reasonable inquiry and documentation across the supply chain.
- Customs source-identification difficulty**
Multi-jurisdictional routing and limited records increase verification challenges.



DISCLAIMER: This map is an indicative risk map based on public reporting, trade data, and open-source information. It illustrates possible routing pathways and verification risks and is not a definitive accusation of wrongdoing or forced labor against any company or location. Actual supply chains are complex and may change over time. Use for risk-awareness and due diligence purposes.

Date: May 17, 2025

Xinjiang to Asia-Pacific: Documented Forced-Labor / Transshipment Doctrine Map

How upstream risk may move through Pakistan, India, Taiwan, the Philippines, Japan, and onward markets

INDICATIVE MAP
Risk Pathways Shown
Not Definitive

TOP RISK THEMES

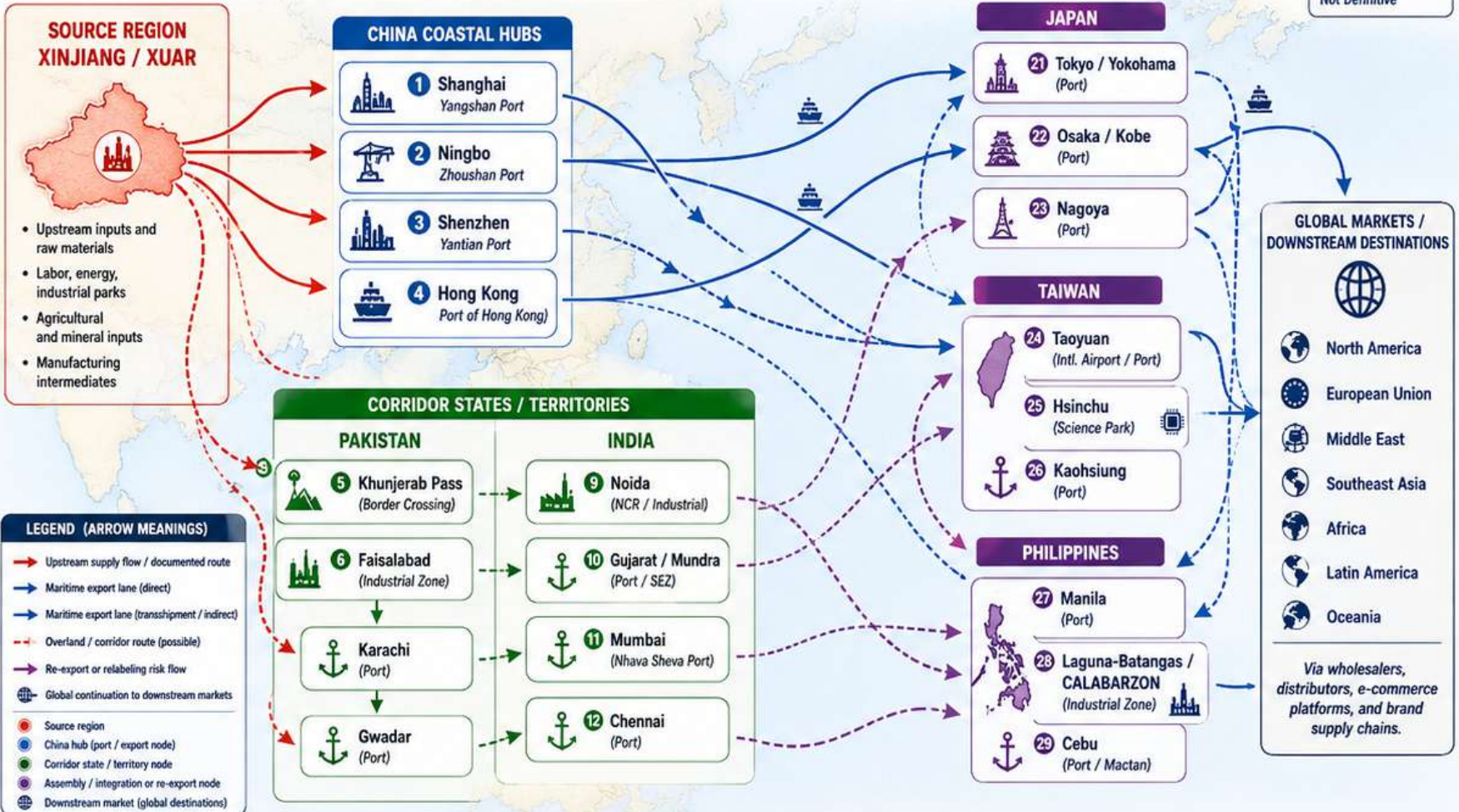
- upstream forced-labor input risk
- third-country assembly
- component-origin opacity
- transshipment / re-export
- downstream market distribution

LEGAL / ENFORCEMENT HOOKS

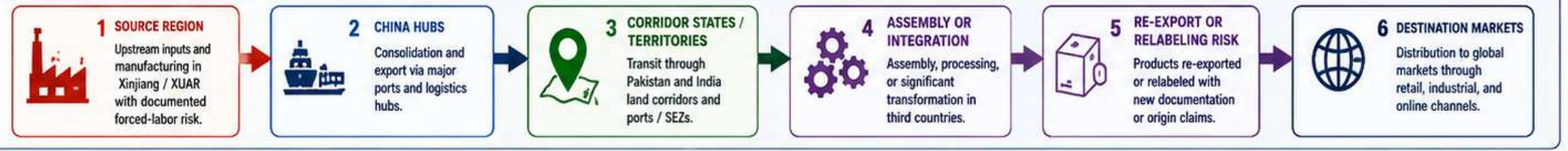
- UFLPA / 19 U.S.C. 1307
- country-of-origin verification
- anti-circumvention and duty-evasion concern
- customs source-identification difficulty

ILLUSTRATIVE PRODUCT CATEGORIES

- cotton / textiles
- solar inputs / polysilicon
- aluminum / industrial inputs
- electronics components
- garments and consumer goods



ASIA-PACIFIC ROUTING DOCTRINE (RISK PATHWAY OVERVIEW)



DISCLAIMER: This map is an indicative, public-reporting-based summary of risk pathways and possible routes. It does not constitute a definitive legal finding or proof of wrongdoing for any node, company, or shipment. Information is subject to change as additional data becomes available.

NOTES

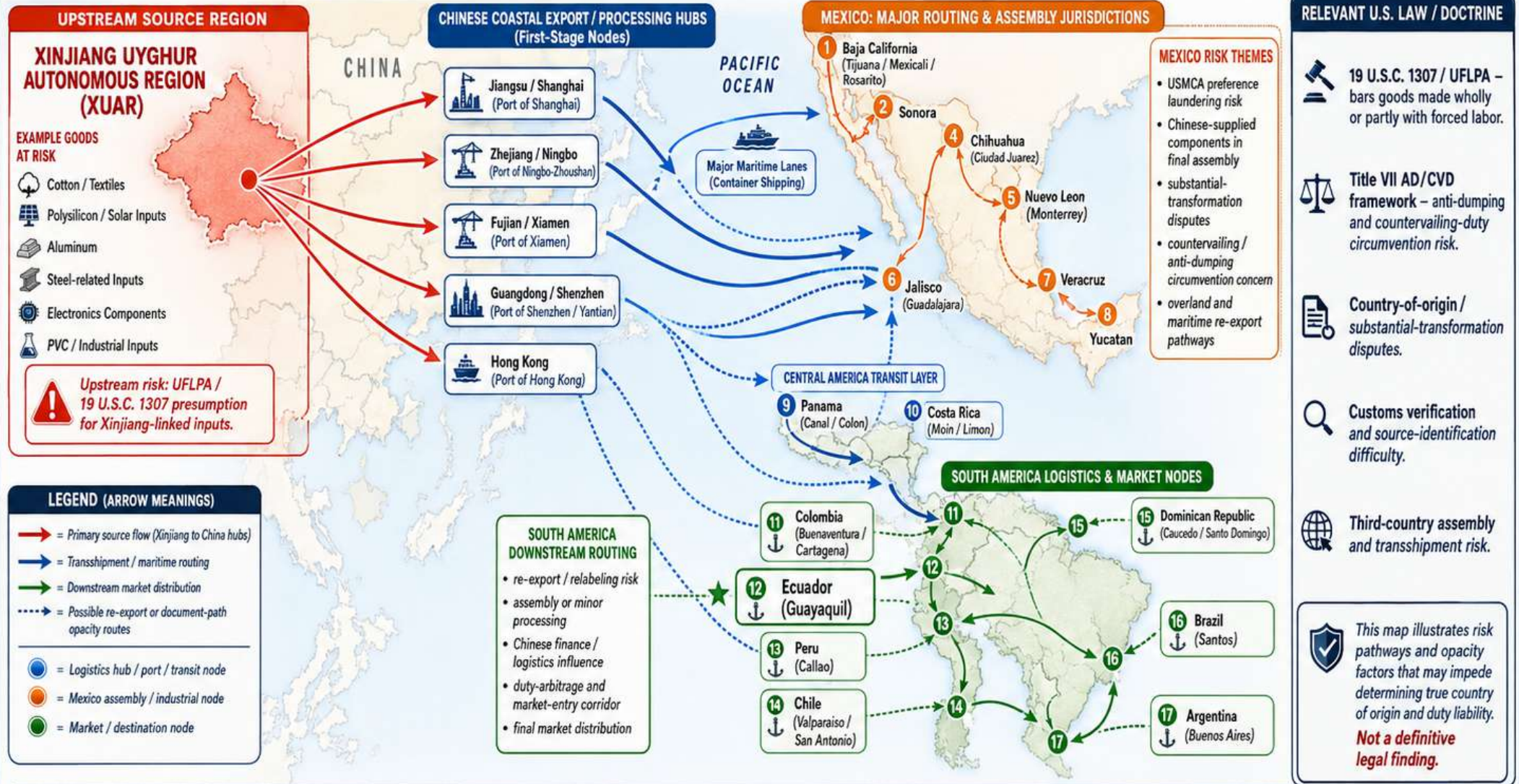
- Routes shown are illustrative, not exhaustive.
- Absence of a route does not indicate absence of risk.

Date: May 17, 2025

For informational use only

Xinjiang-to-Mexico-and-South-America Transshipment / Countervailing-Duty Evasion Risk Map

Documented routing and country-of-origin opacity map – illustrating pathways, risks, and enforcement concerns



Indicative risk assessment based on public reporting and trade-enforcement doctrines. This map shows possible documented routing, transshipment, and source-identification risks and is not a definitive legal finding for every facility, shipment, or country.

Date: May 17, 2025

MAP 5: GOODS FLOW & LAUNDERING DOCTRINE

Typical forced-labor supply-chain routing pattern from Xinjiang to global markets



Conceptual doctrine graphic for risk assessment and educational use based on public reporting; not a definitive legal finding for any individual shipment or facility.

MAP 4: MARITIME, RE-EXPORT & DOCUMENT HUBS

The less-visible logistics nodes



Indicative risk assessment based on public reporting.
Inclusion of a hub does not imply every shipment or firm is unlawful.

MAP 3: SOUTH & SOUTHEAST ASIA CORRIDORS

Third-country manufacturing, assembly, and export routes



DISCLAIMER: Indicative risk assessment based on public reporting and federal-record source categories; not a definitive legal finding for every facility.

Source Categories (not exhaustive):

- Corporate filings & annual reports
- Customs & trade data
- Government press releases & policy documents

- Industry & business media
- NGO & think-tank reports
- Satellite imagery (commercial)
- Open-source shipping data

MAP 2: CENTRAL ASIA LAND CORRIDORS

Xinjiang's western exits and under-mapped Eurasian routing nodes



WHY THESE NODES MATTER

- 1. SOURCE-IDENTIFICATION BREAKS**
Multiple exits create points where source attribution can be obscured.
- 2. ORIGIN RELABELING RISK**
Transshipment and processing enable false or misleading country of origin.
- 3. ROUTE DIVERSIFICATION**
Land and sea options reduce reliance on any single corridor.
- 4. RE-MANIFESTING**
Shipments can be broken up, re-manifested, and re-consolidated.
- 5. WEAK DOWNSTREAM VERIFICATION**
Limited visibility beyond first transfer points.

DOCUMENTED RISK ANCHORS

- DOL - LIST OF GOODS**
- Includes products at risk of forced labor in Xinjiang.
 - Updated periodically.

- STATE - TIP REPORTS**
- Annual Trafficking in Persons Reports document risks in supply chains.
 - Highlight China and transshipment concerns.

- BELT AND ROAD LOGISTICS**
- BRI corridors expand capacity for goods movement.
 - Infrastructure enables obscured routing.

- PUBLIC REPORTING**
- Media, NGO, and research reports document cases.
 - Provides open-source corroboration.

LEGEND

- Source Node (Xinjiang)
- Routing Node / City
- Rail Routes
- Maritime Route
- Port / Maritime Node
- Xinjiang Uygurh Autonomous Region

CORRIDOR & NODE REFERENCE

1	Khorgos Gateway (dry port / rail exit)	Rail connection to Almaty, Aktau, and Eurasian rail network
2	Alashankou (rail crossing)	Rail link to Kazakhstan network via Alashankou-Dostyk
3	Torugart Pass (road exit)	Road to Naryn-Balykchy / Bishkek and onward to Kazakhstan
4	Irkeshtam Pass (road exit)	Road to Osh and onward to Uzbekistan / Kazakhstan
5	Karasu / Kulma Pass (road exit)	Road to Tajikistan (Murgab) and Dushanbe region
6	Khunjerab Pass (road exit)	Road link to Pakistan via Gilgit-Hunza
7	Gwadar Port (CPEC maritime exit)	Access to Arabian Sea and global maritime routes

TYPICAL GOODS AT RISK ALONG THESE CORRIDORS



These goods have been highlighted in public reporting and policy documents as commodities at elevated risk.



Indicative risk assessment based on public reporting; not a definitive legal finding.

MAP 1: DOCUMENTED FORCED-LABOR & TRANSSHIPMENT RISK CORRIDORS AROUND CHINA – OVERVIEW

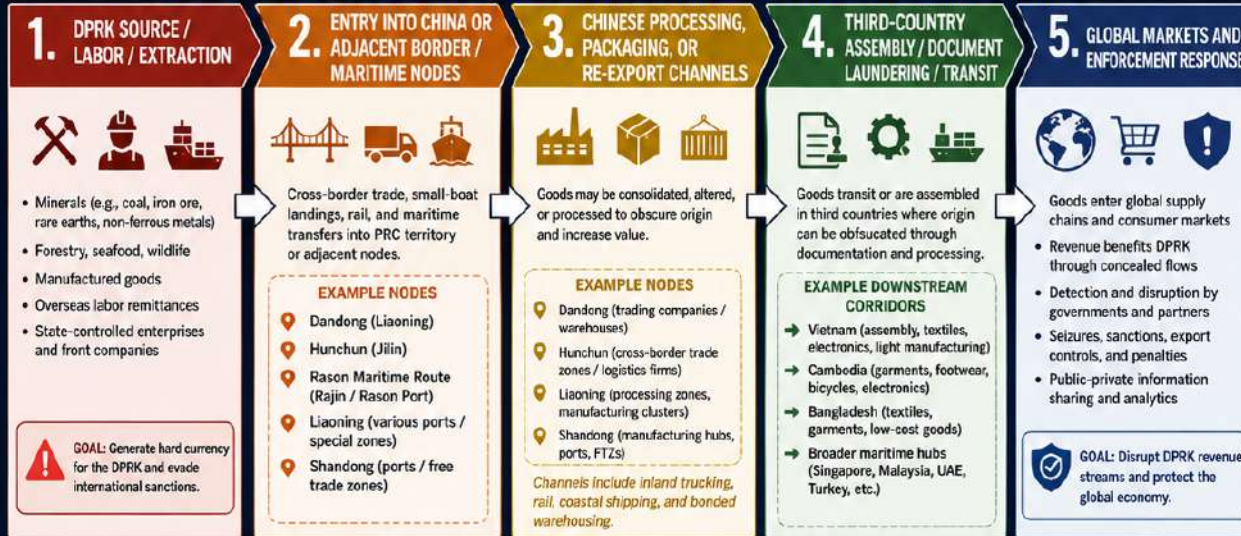
Indicative risk assessment based on public reporting



i This map is an indicative risk assessment based on public reporting, government publications, and academic research. It does not constitute a definitive legal finding for every facility or corridor.

MAP 3: NORTH KOREA TRADE-LAUNDERING / ENFORCEMENT DOCTRINE

★ FIVE-STAGE TRADE-LAUNDERING CHAIN: FROM DPRK SOURCES TO GLOBAL MARKETS ★



- ### PRIMARY LEGAL AUTHORITIES
- 19 U.S.C. § 1307**
(Prohibition on importation of merchandise prohibited by U.S. law)
 - CAATSA § 321**
(Sanctions with respect to North Korea)
 - 31 CFR Part 510**
North Korea Sanctions Regulations
 - U.N. sanctions / shipping restrictions**
(U.N. Security Council Resolutions and related measures)

- ### COMMON CONCEALMENT METHODS
- re-manifesting
 - re-packaging
 - minor processing
 - document-path opacity
 - third-country assembly
 - origin relabeling risk

- ### ENFORCEMENT CONCERNS
- source-identification difficulty
 - complex multi-tier supply chains
 - revenue generation for the DPRK
 - downstream market contamination risk

i Conceptual doctrine graphic for risk assessment and educational use based on public reporting and official legal authorities; not a definitive legal finding for any individual shipment or facility.



MAP 2: DPRK-CHINA BORDER & CHINESE PROCESSING NODES

How North Korea-linked goods and labor risks can move into Chinese trade and processing channels



DISCLAIMER: This map is an indicative risk assessment based on public reporting and official sources. It is not proof that all trade through these nodes is unlawful.

MAP 1: NORTH KOREA → CHINA → GLOBAL MARKETS RISK OVERVIEW

Documented forced-labor, sanctions-evasion, and transshipment risk pathways

KEY GOODS AT RISK

-  **SEAFOOD**
Fish, squid, shellfish & other marine products
-  **TEXTILES**
Garments, fabrics, yarn & textile products
-  **COAL**
Thermal coal, metallurgical coal & briquettes
-  **IRON ORE**
Iron ore, concentrates & related products
-  **TIMBER**
Logs, sawnwood, veneer & wood products
-  **LABOR-EXPORTED MANUFACTURING**
Products produced by North Korean labor (onshore or offshore)
-  **AGRICULTURAL PRODUCTS**
Grains, vegetables, oils & other agricultural goods

-  Primary movement: North Korea → China
-  Secondary movement: China → Third Countries
-  Tertiary movement: Third Countries → Global Markets
-  Maritime route



THIRD COUNTRY TRANSIT / PROCESSING DESTINATIONS

 VIETNAM	 CAMBODIA	 BANGLADESH
---	--	--

GLOBAL MARKETS (FINAL DESTINATION)

 EUROPEAN UNION Finished goods enter via imports from China or third countries	 UNITED STATES Finished goods enter via imports from China or third countries
---	--

KEY U.S. LAW / ENFORCEMENT HOOKS

-  **19 U.S.C. § 1307 — forced-labor import ban**
Prohibits importation of goods mined, produced, or manufactured wholly or in part by forced labor.
-  **CAATSA § 321 — presumption for goods made with North Korean labor**
Rebuttable presumption that any goods made by North Korean labor are sanctioned.
-  **31 CFR Part 510 — North Korea Sanctions Regulations**
Prohibits transactions and trade with North Korea and certain persons and activities.
-  **U.N. sanctions / shipping restrictions**
UNSCRs 1718, 1874, 2087, 2270 & 2397 and relevant measures on trade, shipping, and financial services.

WHY THE ROUTE MATTERS

-  North Korean labor and products can enter Chinese processing or trading channels
-  Country-of-origin visibility can weaken after processing, re-manifesting, or re-export
-  Finished goods may later exit China or third countries for global markets

MAP 3: SOUTH & SOUTHEAST ASIA CORRIDORS

Third-country manufacturing, assembly, and export routes



CORRIDOR CHARACTER BY COUNTRY

- VIETNAM**
 - Tier 4 Assembly
 - Final assembly & testing
 - Electronics, apparel, footwear, furniture
 - High export orientation
- CAMBODIA**
 - Routing / SEZ
 - Transshipment & logistics hub
 - SEZ-based processing
 - Textiles, footwear, light assembly
- THAILAND**
 - Solar / Electronics / EV
 - Solar modules, electronics
 - EV parts, batteries
 - Advanced manufacturing in EEC
- MALAYSIA**
 - Solar / Semiconductors / Palm Oil
 - Solar, chips & components
 - Palm oil & derivatives
 - High-value re-exports
- BANGLADESH**
 - Garment Assembly
 - Knitwear & woven apparel
 - Low-cost assembly
 - Global apparel supply
- SRI LANKA**
 - Maritime Transshipment
 - Port transshipment hub
 - Bunkering & logistics
 - Re-exports to global markets
- INDIA**
 - Alternative Supply with Verification Risk
 - Solar, electronics, APIs
 - Domestic content rules
 - High verification & documentation burden

- #### KEY PRODUCTS
- Garments & Textiles
 - Electronics Components
 - Solar Products
 - Cotton Yarn / Fabric
 - Seafood
 - Aluminum / Metal Products

GLOBAL EXPORT MARKETS
 North America • Europe • Japan • Korea • Middle East • Africa • Latin America
 Finished goods and components shipped via sea, air, and land routes

LEGEND

- Flows from China / Xinjiang (Raw materials, inputs, components)
- Flows from Coastal China (Intermediate & capital goods)
- China-Laos Rail Corridor
- SEZ / Routing Corridors
- Thailand EEC Zone
- Major Ports
- Manufacturing / Industrial Nodes
- Exports to Global Markets



DISCLAIMER: Indicative risk assessment based on public reporting and federal-record source categories; not a definitive legal finding for every facility.

Source Categories (not exhaustive):

- Corporate filings & annual reports
- Customs & trade data
- Government press releases & policy documents
- Industry & business media
- NGO & think-tank reports
- Satellite imagery (commercial)
- Open-source shipping data

MAP 4: MARITIME, RE-EXPORT & DOCUMENT HUBS

The less-visible logistics nodes



Indicative risk assessment based on public reporting.
Inclusion of a hub does not imply every shipment or firm is unlawful.

MAP 3: SOUTH & SOUTHEAST ASIA CORRIDORS

Third-country manufacturing, assembly, and export routes



CHINA / XINJIANG
Raw materials, components, machinery, and inputs

COASTAL CHINA
Intermediate goods, components, and capital goods

CORRIDOR CHARACTER BY COUNTRY

VIETNAM
= Tier 4 Assembly
• Final assembly & testing
• Electronics, apparel, footwear, furniture
• High export orientation

CAMBODIA
= Routing / SEZ
• Transshipment & logistics hub
• SEZ-based processing
• Textiles, footwear, light assembly

THAILAND
= Solar / Electronics / EV
• Solar modules, electronics
• EV parts, batteries
• Advanced manufacturing in EEC

MALAYSIA
= Solar / Semiconductors / Palm Oil
• Solar, chips & components
• Palm oil & derivatives
• High-value re-exports

BANGLADESH
= Garment Assembly
• Knitwear & woven apparel
• Low-cost assembly
• Global apparel supply

SRI LANKA
= Maritime Transshipment
• Port transshipment hub
• Bunkering & logistics
• Re-exports to global markets

INDIA
= Alternative Supply with Verification Risk
• Solar, electronics, APIs
• Domestic content rules
• High verification & documentation burden

- KEY PRODUCTS**
- Garments & Textiles
 - Electronics Components
 - Solar Products
 - Cotton Yarn / Fabric
 - Seafood
 - Aluminum / Metal Products

GLOBAL EXPORT MARKETS
North America • Europe • Japan • Korea • Middle East • Africa • Latin America
Finished goods and components shipped via sea, air, and land routes

LEGEND

- Flows from China / Xinjiang (Raw materials, inputs, components)
- Flows from Coastal China (Intermediate & capital goods)
- China-Laos Rail Corridor
- SEZ / Routing Corridors
- Thailand EEC Zone
- Major Ports
- Manufacturing / Industrial Nodes
- Exports to Global Markets



DISCLAIMER: Indicative risk assessment based on public reporting and federal-record source categories; not a definitive legal finding for every facility.

Source Categories (not exhaustive):

- Corporate filings & annual reports
- Customs & trade data
- Government press releases & policy documents
- Industry & business media
- NGO & think-tank reports
- Satellite imagery (commercial)
- Open-source shipping data

MAP 3: SOUTH & SOUTHEAST ASIA CORRIDORS

Third-country manufacturing, assembly, and export routes



CORRIDOR CHARACTER BY COUNTRY

- VIETNAM**
 - Tier 4 Assembly
 - Final assembly & testing
 - Electronics, apparel, footwear, furniture
 - High export orientation
- CAMBODIA**
 - Routing / SEZ
 - Transshipment & logistics hub
 - SEZ-based processing
 - Textiles, footwear, light assembly
- THAILAND**
 - Solar / Electronics / EV
 - Solar modules, electronics
 - EV parts, batteries
 - Advanced manufacturing in EEC
- MALAYSIA**
 - Solar / Semiconductors / Palm Oil
 - Solar, chips & components
 - Palm oil & derivatives
 - High-value re-exports
- BANGLADESH**
 - Garment Assembly
 - Knitwear & woven apparel
 - Low-cost assembly
 - Global apparel supply
- SRI LANKA**
 - Maritime Transshipment
 - Port transshipment hub
 - Bunkering & logistics
 - Re-exports to global markets
- INDIA**
 - Alternative Supply with Verification Risk
 - Solar, electronics, APIs
 - Domestic content rules
 - High verification & documentation burden

- #### KEY PRODUCTS
- Garments & Textiles
 - Electronics Components
 - Solar Products
 - Cotton Yarn / Fabric
 - Seafood
 - Aluminum / Metal Products

GLOBAL EXPORT MARKETS
 North America • Europe • Japan • Korea • Middle East • Africa • Latin America
 Finished goods and components shipped via sea, air, and land routes

LEGEND

- Flows from China / Xinjiang (Raw materials, inputs, components)
- Flows from Coastal China (Intermediate & capital goods)
- China-Laos Rail Corridor
- SEZ / Routing Corridors
- Thailand EEC Zone
- Major Ports
- Manufacturing / Industrial Nodes
- Exports to Global Markets



DISCLAIMER: Indicative risk assessment based on public reporting and federal-record source categories; not a definitive legal finding for every facility.

Source Categories (not exhaustive):

- Corporate filings & annual reports
- Customs & trade data
- Government press releases & policy documents
- Industry & business media
- NGO & think-tank reports
- Satellite imagery (commercial)
- Open-source shipping data

MAP 4: MARITIME, RE-EXPORT & DOCUMENT HUBS

The less-visible logistics nodes



Indicative risk assessment based on public reporting.
 Inclusion of a hub does not imply every shipment or firm is unlawful.

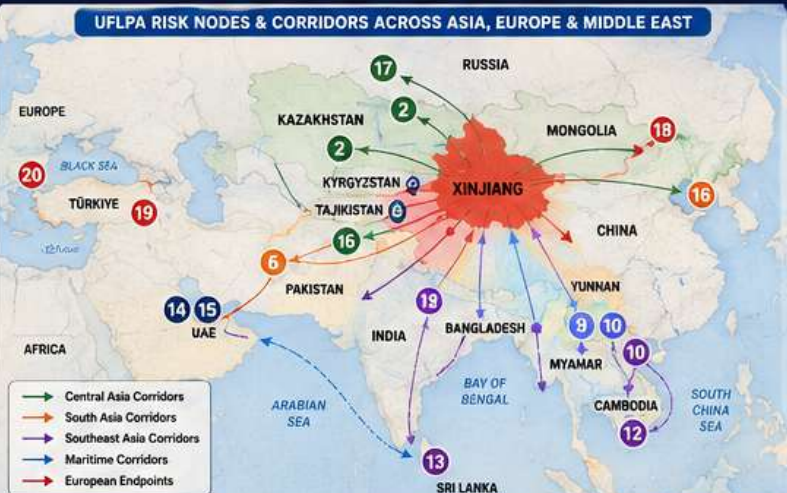
MAP 5: GOODS FLOW & LAUNDERING DOCTRINE

Typical forced-labor supply-chain routing pattern from Xinjiang to global markets



Conceptual doctrine graphic for risk assessment and educational use based on public reporting; not a definitive legal finding for any individual shipment or facility.

MAP 1: TOP 20 FORCED LABOR TRANSHIPMENT ROUTES AROUND CHINA - OVERVIEW MAP



THE TOP 20 DOCUMENTED RISK NODES (See Maps 2-5 for Details)

1 Khorgos (Kazakhstan)	8 Rull/Muse Crossing (Myanmar)	15 Jebel Ali (UAE)
2 Alashankou (Kazakhstan)	9 Mongla/BoTen (Laos)	16 Dandong (North Korea)
3 Irkeshtam Pass (Kyrgyzstan)	10 Mohan-Boten Rail (Laos)	17 Russia Far East Corridors
4 Torugart Pass (Kyrgyzstan)	11 Siهانoukville (Cambodia)	18 Mongolia (Erenhot/Zamyn-Uud)
5 Karasu/Kulma Pass (Tajikistan)	12 Bangladesh (Chittagong)	19 Türkiye (Mersin/Istanbul)
6 Khunjerab Pass (Pakistan)	13 Sri Lanka (Hambantota/Colombo)	20 Hungary/Serbia (EU Endpoints)
7 Gwadar Port (Pakistan)	14 Bahrain (Khalifa Port)	

DISCLAIMER: This map is for informational and risk assessment purposes based on open-source reporting and U.S. government publications. It does not constitute a legal finding.

MAP 2: CENTRAL ASIA LAND CORRIDORS THE WESTERN EXIT - "THE STANS" ROUTES



SOURCES: DOL List of Goods (2024); State TIP Reports; CSIS; AidData; UN Comtrade; Media Reports; U.S. Customs & Border Protection (CBP)

MAP 3: SOUTH & SOUTHEAST ASIA CORRIDORS THE SOUTHERN & MARITIME ROUTES



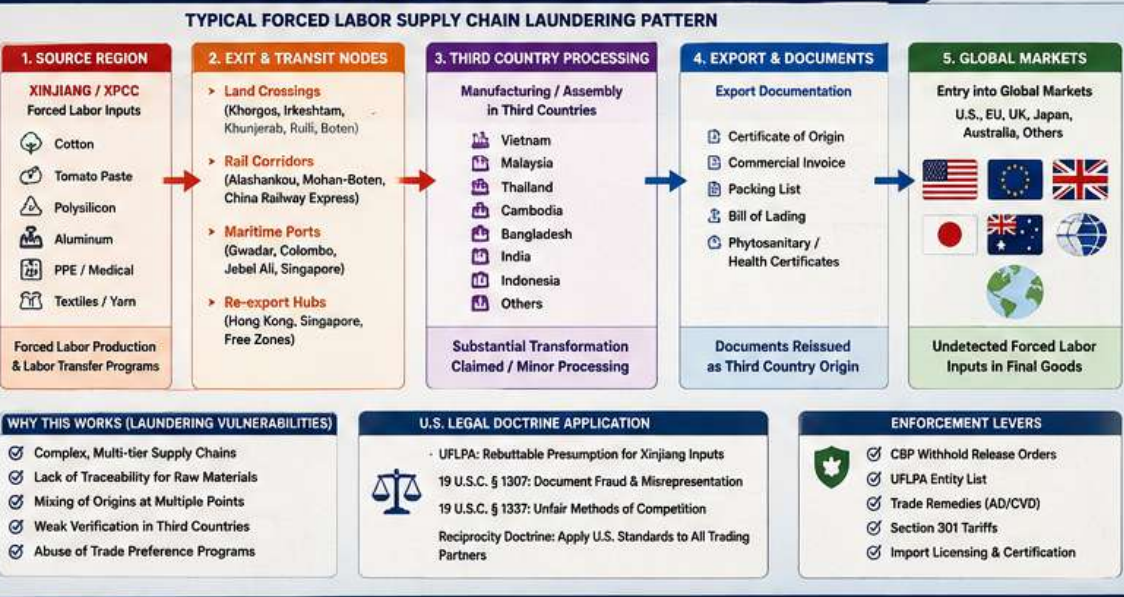
SOURCES: DOL List of Goods; Reuters; RFA; State TIP Reports; Industry Reports; CBP

MAP 4: MIDDLE EAST, MARITIME & RE-EXPORT HUBS THE INVISIBLE TRADE & LOGISTICS NODES



DISCLAIMERS: DOL List of Goods; State TIP Reports; U.S. Customs & Border Protection; U.S. Customs & Border Protection; CGIA; OECD; Media Investigations

MAP 5: GOODS FLOW & LAUNDERING DOCTRINE FROM XINJIANG TO GLOBAL MARKETS



DISCLAIMER: These maps are based on public reporting, government publications, and academic research. They are for risk assessment and educational purposes only and do not constitute definitive legal findings. Routes and methods change over time.



TOP 20 DOCUMENTED FORCED-LABOR / ROUTING RISK LOCATIONS NEAR CHINA



High-Risk Source Regions and Routing Corridors in Asia Linked to Forced Labor and Supply Chain Diversion



TOP 20 RISK LOCATIONS & WHY THEY MATTER

1	Xinjiang / XUAR	Primary UFLPA source region	
2	XPCC areas (Xinjiang Production & Construction Corps)	State-run entities with forced-labor risk	
3	Guangdong / Shenzhen / Dongguan	Electronics & manufacturing mega-cluster	
4	Fujian / Xiamen	Footwear, apparel & seafood processing hub	
5	Zhejiang / Ningbo / Hangzhou	Textiles, home goods & electronics corridor	
6	Jiangsu / Suzhou / Wuxi	High-tech & electronics manufacturing base	
7	Hong Kong	Re-export & transshipment logistics hub	
8	Singapore	Global transshipment & consolidation hub	
9	Northern Vietnam	Electronics & components assembly corridor	
10	Southern Vietnam	Footwear, electronics & consumer goods hub	
11	Vietnam textile belt	Major garment & textile manufacturing zone	
12	Malaysia (Penang / Selangor / Johor)	Electronics, E&E & solar manufacturing	
13	Thailand EEC	Automotive, electronics & appliance production zone	
14	Cambodia Sihanoukville	Garment, footwear & logistics port	
15	Cambodia Bavet	Border trade & light manufacturing corridor	
16	Bangladesh Dhaka / Gazipur / Narayanganj	Major RMG production concentration	
17	Bangladesh Chittagong	Garment exports & port logistics gateway	
18	India Gujarat	Textiles, chemicals & petrochem corridor	
19	India Tamil Nadu	Textiles, apparel & electronics manufacturing	
20	India Andhra Pradesh	Apparel, electronics & industrial corridor	
20	Laos / Myanmar / Yunnan border corridor	Overland routing corridor for goods & labor movement	
20	Indonesia Morowali / Weda Bay / Sulawesi / Halmahera	Nickel, smelting & battery materials corridor	

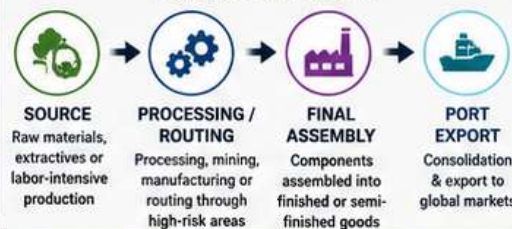
LEGEND

- Overland corridor (from China inland)
- Coastal / industrial corridor (within China)
- Land border corridor
- Manufacturing belt corridor (SEA inland)
- Apparel / textile corridor
- Maritime / sea route

MAJOR SECTORS (click legend)

- Cotton
- Textiles
- Apparel / Garments
- Solar
- Electronics
- Logistics / Transshipment
- Seafood
- Aluminum
- Nickel
- Batteries

HOW THE FLOW WORKS



KEY MESSAGE



Final country label may conceal upstream forced-labor-linked inputs or routed components.



DISCLAIMER: This map and ranking are an indicative risk assessment based on public reporting and federal/public sources, including but not limited to: U.S. Department of State, U.S. Department of Labor, CBP, UFLPA Entity List, Interagency Forced Labor Working Group (IFLWG), NGO reports, and other open-source research. It does not constitute a definitive legal finding for any specific facility, company, product, or shipment. Risk levels may change over time.

DATE: MAY 2024

Asia Forced-Labor Input and Transshipment Flow Map

Upstream Inputs Move Into Downstream Assembly Corridors and Out Through Export Gateways

1 SOURCE REGIONS Upstream Inputs

- Xinjiang / XUAR**
Cotton, Polysilicon, Aluminum, Chemicals
- XPCC Areas**
Cotton, Tomato, Wolfberry, Metals
- Guangdong (Coastal Hub)**
Electronics, Machinery, Textiles, Apparel
- Fujian (Coastal Hub)**
Textiles, Footwear, Seafood, Timber
- Zhejiang (Coastal Hub)**
Textiles, Apparel, Small Appliances
- Jiangsu (Coastal Hub)**
Electronics, Components, Machinery

2 ROUTING / PROCESSING CORRIDORS Processing & Assembly

- Northern Vietnam
- Southern Vietnam
- Vietnam Textile Belt
- Malaysia
- Thailand
- Cambodia (Sihanoukville)
- Cambodia (Bavet)
- Bangladesh Garment Belt
- India Solar Corridor
- Indonesia Nickel Corridor
- Laos / Myanmar / Yunnan Overland Connector

3 EXPORT / TRADING GATEWAYS Global Exit Points

- Hong Kong
- Singapore
- Hai Phong (Vietnam)
- Ho Chi Minh City (Vietnam)
- Chittagong (Bangladesh)
- Major Southeast Asian Export Channels
Sea, Air, and Overland



MAJOR RISK CHANNELS

- Cotton / Fabric to Apparel**
Chinese cotton & fabrics flow to Vietnam, Bangladesh, Cambodia for garment assembly and re-export.
- Solar / Polysilicon**
Polysilicon & wafers from China routed to Malaysia, Thailand, Vietnam for solar module assembly.
- Electronics / Components**
Components from coastal China assembled in Vietnam, Malaysia, Thailand for global electronics.
- Nickel / Battery Materials**
Nickel ore to Indonesia for smelting and precursor production for batteries and EV supply chains.
- Seafood / Agriculture**
Seafood, cassava, rice, rubber, and other goods from Thailand and Cambodia at forced-labor risk.

TOP 10 CORRIDORS (RANKED BY RISK)

- Xinjiang / XPCC Input Corridor
- Vietnam Corridor (North-South & Textile Belt)
- Malaysia Processing Corridor
- Thailand Processing Corridor
- Cambodia Corridor (Sihanoukville & Bavet)
- Bangladesh Garment Corridor
- India Solar Verification Corridor
- Indonesia Nickel Corridor
- Hong Kong / Singapore Trading Hubs
- Coastal China Export Hubs (Guangdong, Fujian, Zhejiang, Jiangsu)

DISCLAIMER: This map is an illustrative, analytic depiction based on open-source reporting and assessments of risk, not evidence of specific violations by any entity. It is intended to support policy analysis and due diligence, not for legal enforcement. Routes and activities may change. Users should conduct independent verification.

NOT FOR LEGAL OR PROBATIVE USE



TOP 20 DOCUMENTED FORCED-LABOR / ROUTING RISK LOCATIONS NEAR CHINA



High-Risk Source Regions and Routing Corridors in Asia Linked to Forced Labor and Supply Chain Diversion



TOP 20 RISK LOCATIONS & WHY THEY MATTER

Rank	Location	Why They Matter	Major Sectors
1	Xinjiang / XUAR	Primary UFLPA source region	Cotton, Textiles, Apparel, Electronics
2	XPCC areas (Xinjiang Production & Construction Corps)	State-run entities with forced-labor risk	Cotton, Textiles, Apparel, Electronics
3	Guangdong / Shenzhen / Dongguan	Electronics & manufacturing mega-cluster	Electronics, Apparel, Textiles
4	Fujian / Xiamen	Footwear, apparel & seafood processing hub	Textiles, Apparel, Seafood
5	Zhejiang / Ningbo / Hangzhou	Textiles, home goods & electronics corridor	Textiles, Apparel, Electronics
6	Jiangsu / Suzhou / Wuxi	High-tech & electronics manufacturing base	Electronics, Apparel, Textiles
7	Hong Kong	Re-export & transshipment logistics hub	Logistics / Transshipment
8	Singapore	Global transshipment & consolidation hub	Logistics / Transshipment
9	Northern Vietnam	Electronics & components assembly corridor	Electronics, Apparel, Textiles
10	Southern Vietnam	Footwear, electronics & consumer goods hub	Textiles, Apparel, Electronics
11	Vietnam textile belt	Major garment & textile manufacturing zone	Textiles, Apparel
12	Malaysia (Penang / Selangor / Johor)	Electronics, E&E & solar manufacturing	Electronics, Solar
13	Thailand EEC	Automotive, electronics & appliance production zone	Electronics, Apparel, Textiles
14	Cambodia Sihanoukville	Garment, footwear & logistics port	Textiles, Apparel, Logistics
15	Cambodia Bavet	Border trade & light manufacturing corridor	Textiles, Apparel
16	Bangladesh Dhaka / Gazipur / Narayanganj	Major RMG production concentration	Textiles, Apparel
17	Bangladesh Chittagong	Garment exports & port logistics gateway	Textiles, Apparel, Logistics
18	India Gujarat	Textiles, chemicals & petrochem corridor	Textiles, Apparel
19	India Tamil Nadu	Textiles, apparel & electronics manufacturing	Textiles, Apparel, Electronics
20	India Andhra Pradesh	Apparel, electronics & industrial corridor	Textiles, Apparel, Electronics
20	Laos / Myanmar / Yunnan border corridor	Overland routing corridor for goods & labor movement	Logistics / Transshipment, Aluminum, Nickel
20	Indonesia Morowali / Weda Bay / Sulawesi / Halmahera	Nickel, smelting & battery materials corridor	Aluminum, Nickel, Batteries

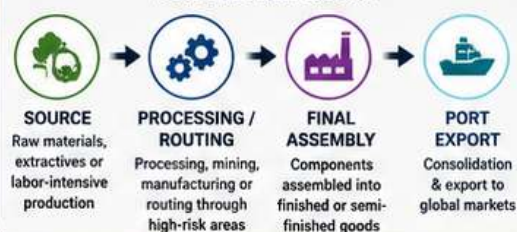
LEGEND

- Overland corridor (from China inland)
- - - Coastal / industrial corridor (within China)
- - - Land border corridor
- - - Manufacturing belt corridor (SEA inland)
- - - Apparel / textile corridor
- - - Maritime / sea route

MAJOR SECTORS (click legend)

- Cotton
- Textiles
- Apparel / Garments
- Solar
- Electronics
- Logistics / Transshipment
- Seafood
- Aluminum
- Nickel
- Batteries

HOW THE FLOW WORKS



KEY MESSAGE

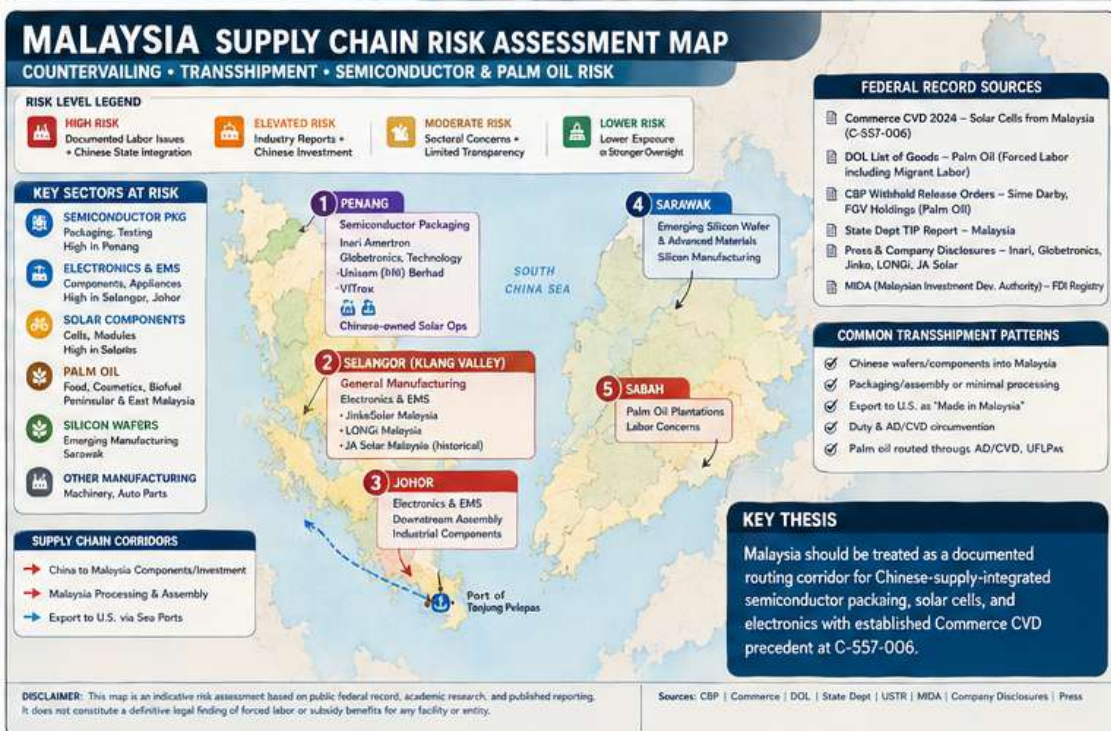
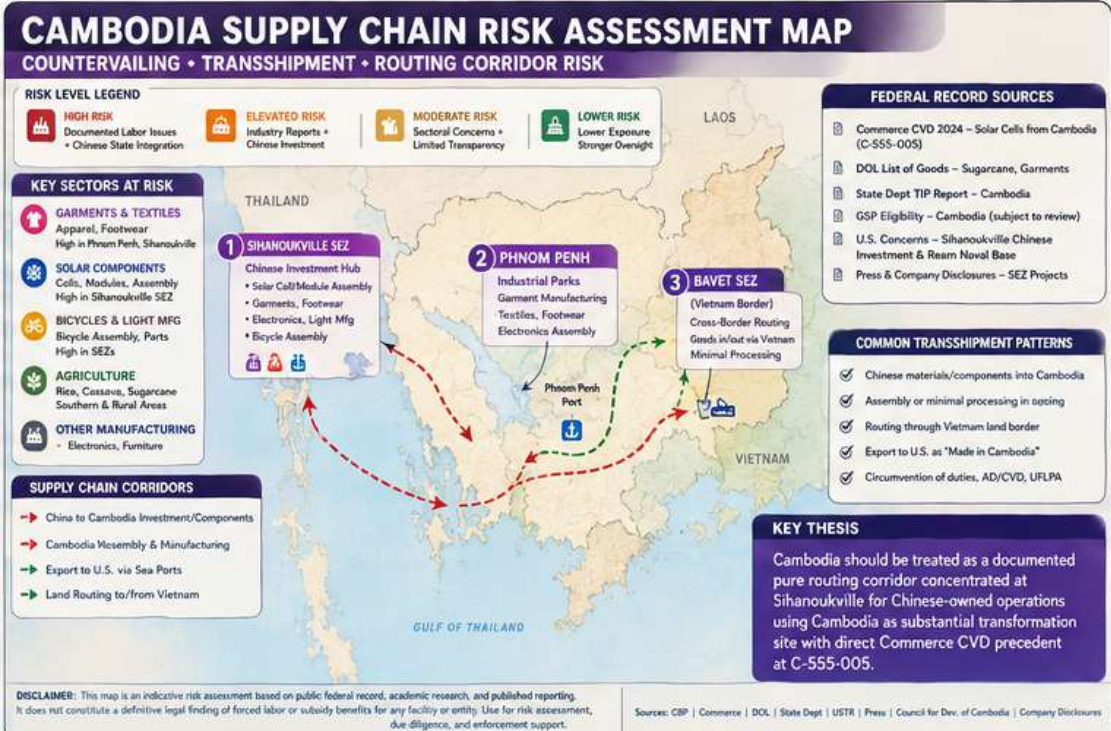
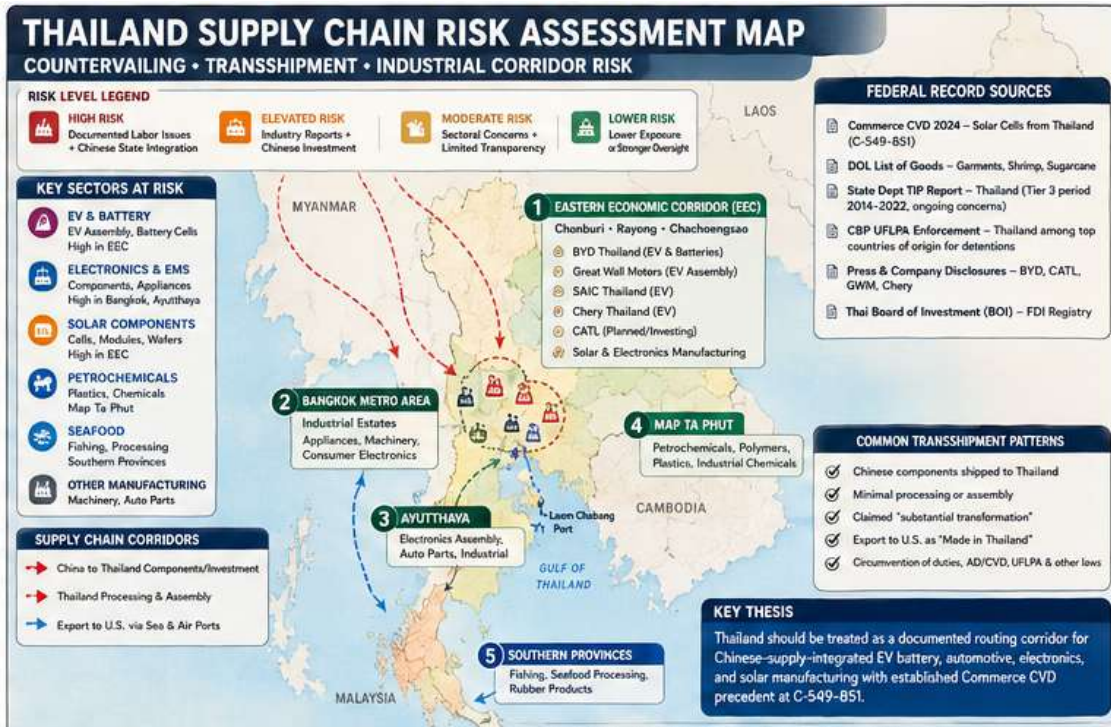


Final country label may conceal upstream forced-labor-linked inputs or routed components.



DISCLAIMER: This map and ranking are an indicative risk assessment based on public reporting and federal/public sources, including but not limited to: U.S. Department of State, U.S. Department of Labor, CBP, UFLPA Entity List, Interagency Forced Labor Working Group (IFLWG), NGO reports, and other open-source research. It does not constitute a definitive legal finding for any specific facility, company, product, or shipment. Risk levels may change over time.

DATE: MAY 2024



1. INDONESIA SUPPLY CHAIN RISK ASSESSMENT MAP

COUNTERVAILING · TRANSSHIPMENT · TIER 0 RAW MATERIALS RISK



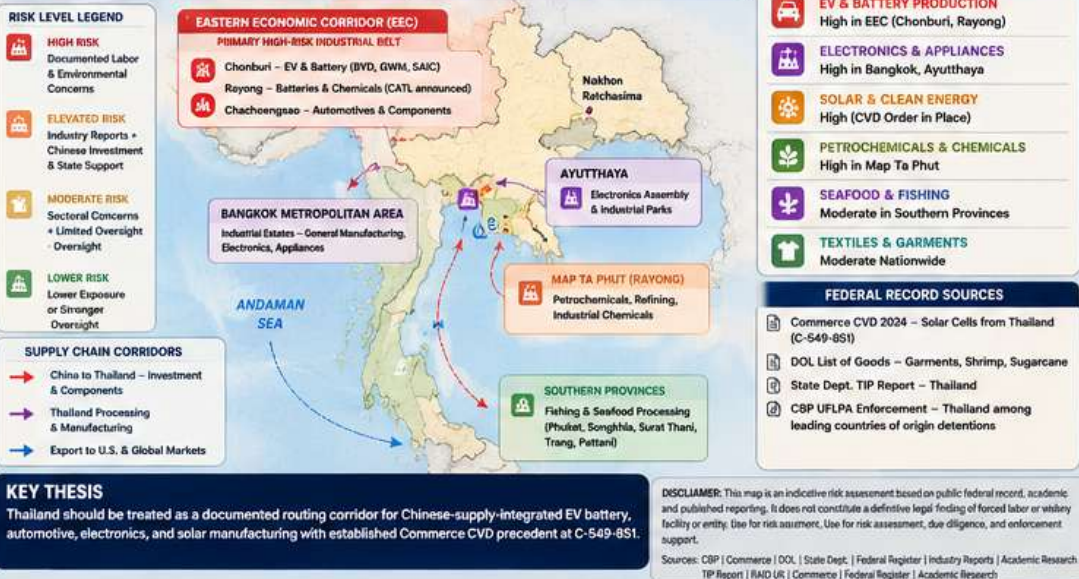
2. MEXICO SUPPLY CHAIN RISK ASSESSMENT MAP

COUNTERVAILING · USMCA PREFERENCE LAUNDERING · TRANSSHIPMENT RISK



3. THAILAND SUPPLY CHAIN RISK ASSESSMENT MAP

COUNTERVAILING · TRANSSHIPMENT · EV, BATTERY, SOLAR & ELECTRONICS RISK



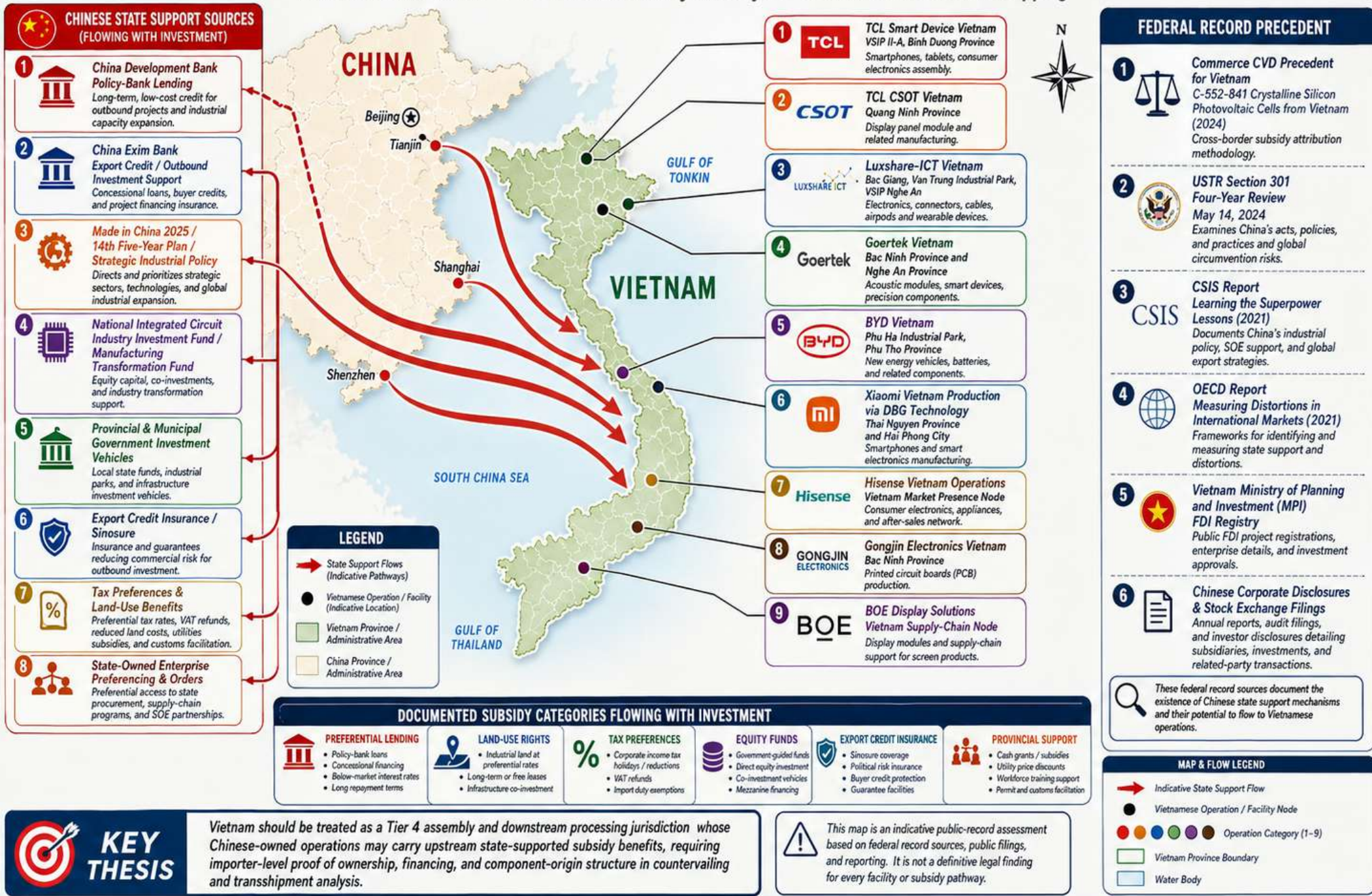
4. CAMBODIA SUPPLY CHAIN RISK ASSESSMENT MAP

COUNTERVAILING · PURE ROUTING CORRIDOR · CHINESE INVESTMENT RISK



CHINESE STATE SUBSIDY FLOW TO VIETNAMESE OPERATIONS

Federal Record Sources • Documented Subsidy Pathways • Indicative Public Record Mapping



CHINA → VIETNAM SUBSIDY FLOW MAP

Countervailing Risk • Chinese State Support • Vietnamese Operations

1 CHINESE STATE SUPPORT ORIGIN SOURCES (IN CHINA)



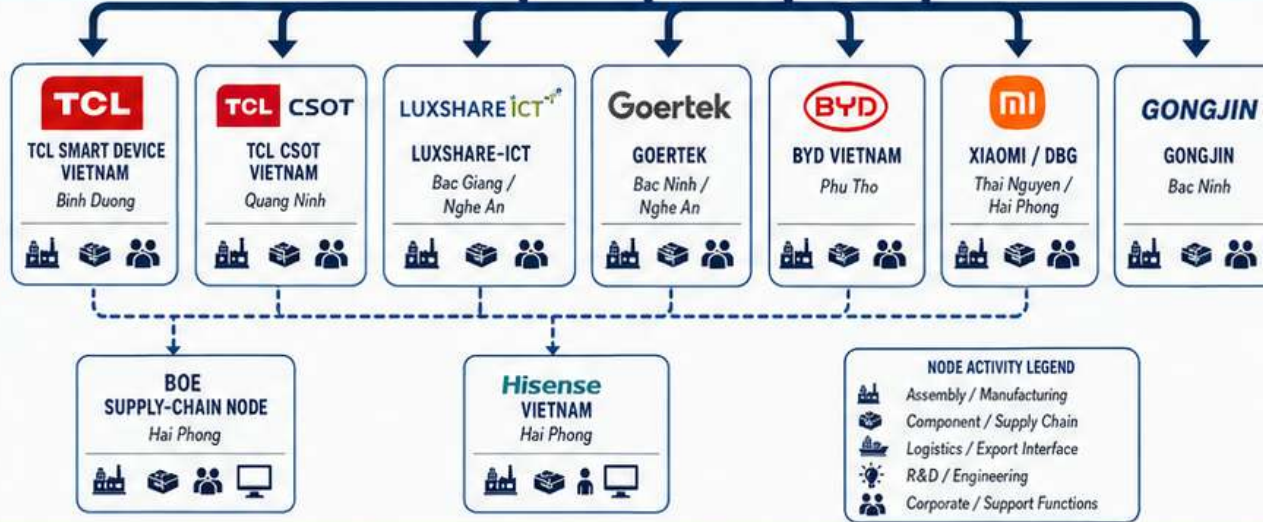
State-directed finance, policy, insurance, and incentives create subsidy benefits.



STATE SUPPORT BENEFITS FLOW INTO OVERSEAS INVESTMENTS & OPERATIONS

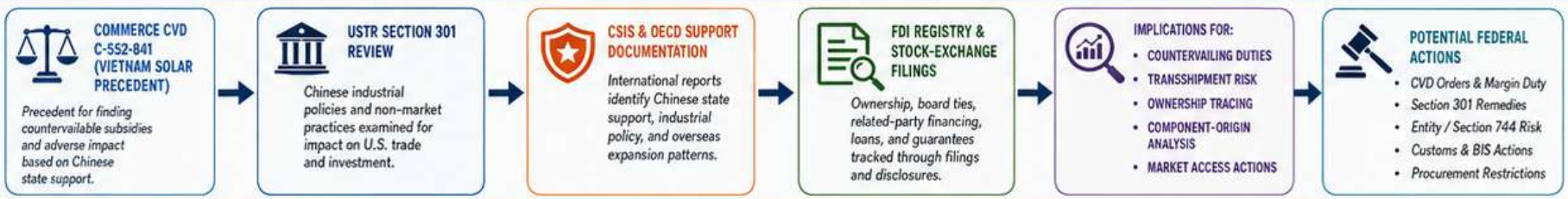
2 VIETNAM OPERATION NODES

Chinese-invested facilities and supply-chain operations in Vietnam.



3 EXPORT IMPLICATIONS & FEDERAL PRECEDENT

Federal authorities analyze and address unfair subsidization risk.



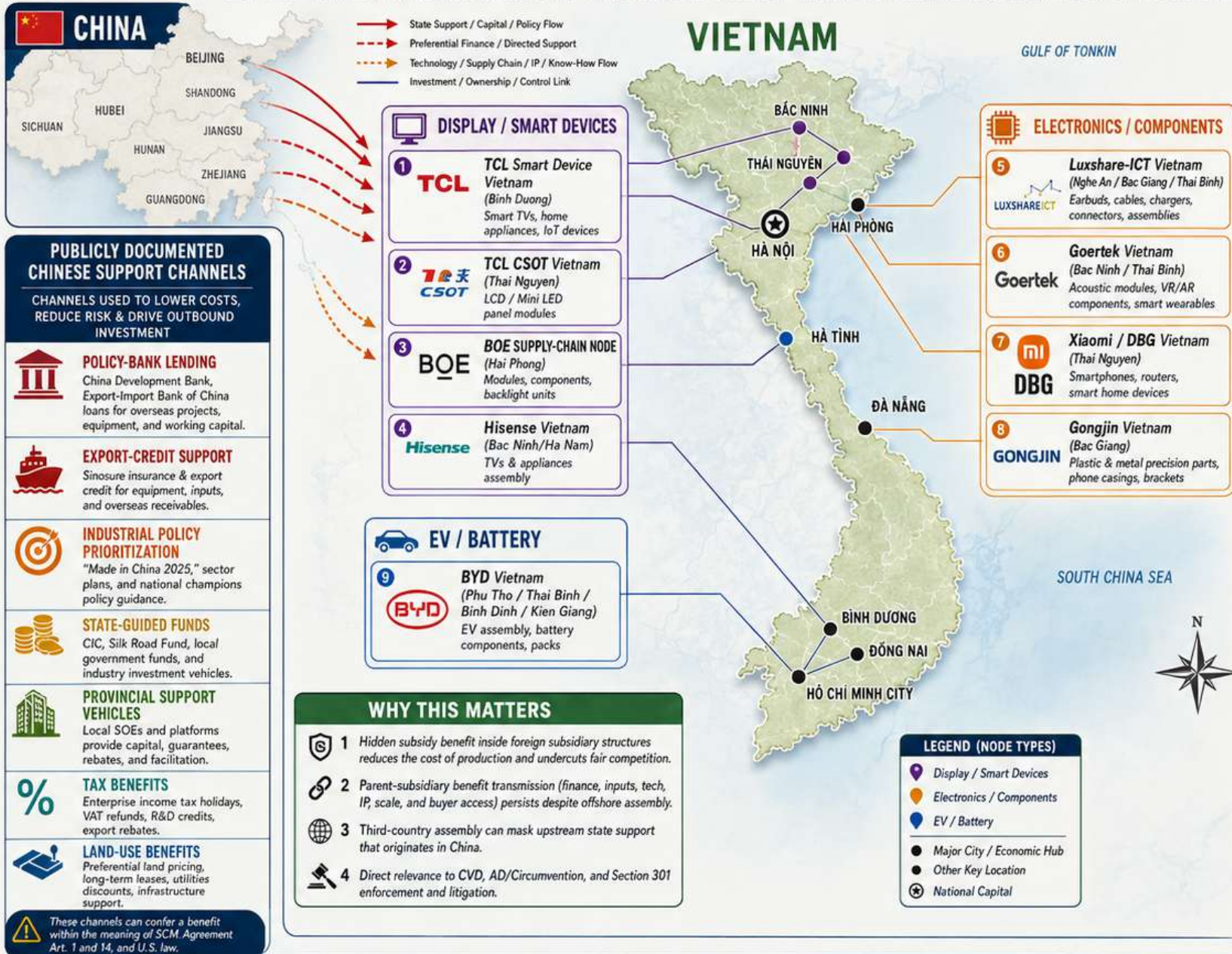
KEY THESIS Subsidy benefits can travel with Chinese parent investment into Vietnamese subsidiaries and assembly operations, making ownership structure, financing, and component-origin tracing central to unfair-trade analysis.

DISCLAIMER
This map is indicative and based on public federal-record and public-reporting sources. It reflects potential subsidy flows and risk factors, not a definitive finding for each entity or a legal determination by any agency or court.

CHINESE STATE SUBSIDY FLOW TO VIETNAM: FACILITY & PRECEDENT MAP

VERSION 3

MAPPING FACILITIES, PARENT-SUBSIDIARY LINKS & STATE SUPPORT CHANNELS FOR ENFORCEMENT AND LITIGATION PURPOSES



HOW THE FEDERAL RECORD USES THIS

COMMERCE CVD 2024: VIETNAM SOLAR (C-552-841)

- Found pervasive Chinese-government subsidization across the solar supply chain.
- Supports cross-border subsidy attribution where benefits flow from China into Vietnam.

USTR 301 FOUR-YEAR REVIEW

- Documents China's industrial policies, state-directed capital, and market distortions.
- Provides context for outbound investment and foreign subsidiary use to circumvent U.S. duties.

CSIS: CHINA'S INDUSTRIAL SUBSIDIES (2024)

- Company-level examples of state support, including:
 - TCL CSOT (state-directed investment & funding)
 - BOE (state capital & policy support for scale)
- Describes subsidy channels that lower costs overseas.

OECD: SUBSIDY DISTORTION & MEASUREMENT

- Frameworks for identifying cross-border subsidy benefits and estimating distortive effects.

PUBLIC CORPORATE DISCLOSURES & SEC FILINGS

- Annual reports, investor presentations, and bond disclosures on parent support, guarantees, and related-party transactions.

VIETNAM FDI REGISTRY & PUBLIC RECORDS

- Investment Registration Certificates, enterprise registries, customs data, and tax filings confirm ownership, scope, and operational details.

KEY LITIGATION THESIS Chinese subsidy architecture does not stop at the border; it can shape the cost structure of Vietnam-based operations tied to Chinese parent companies.

DISCLAIMER: Inclusion of a facility or company is for indicative public-record mapping and does not constitute a definitive finding of subsidy, benefit, or improper conduct at the project level. Facts must be proven in the context of the applicable legal standard.

VIETNAM OPERATIONS WITH CHINESE STATE-SUPPORT EXPOSURE

Indicative Countervailing / Transshipment / Ownership-Tracing Map

CHINA

STATE-SUPPORT SOURCES

CDB
China Development Bank

China Exim
Export-Import Bank of China

Industrial Policy
Made in China 2025 and sector plans

State-Guided Funds
National & provincial investment funds

Provincial Vehicles
SOEs and local investment platforms

Sinosure
Export credit insurance and guarantees

Land & Tax Incentives
Preferential land, tax, and fee concessions

PRECEDENT & SOURCES

Commerce CVD C-552-841
Certain Chinese-Made Steel Products (2020)

USTR 301 Four-Year Review (2024)
China's Acts, Policies and Practices

CSIS (2021)
Chinese Industrial Subsidies and Overcapacity

OECD Distortions Reports (2019-2023)
Impact of State Support

Chinese Corporate Filings
Annual reports, prospectuses, stock exchange filings

Vietnam FDI Registry
MPI & provincial investment portals

KEY ANALYTICAL USES

1. COUNTERVAILING ANALYSIS

2. ANTI-CIRCUMVENTION ANALYSIS

3. OWNERSHIP TRACING

4. FINANCING TRACING

5. SUPPLIER DUE DILIGENCE

6. PUBLIC-INTEREST RECORD BUILDING

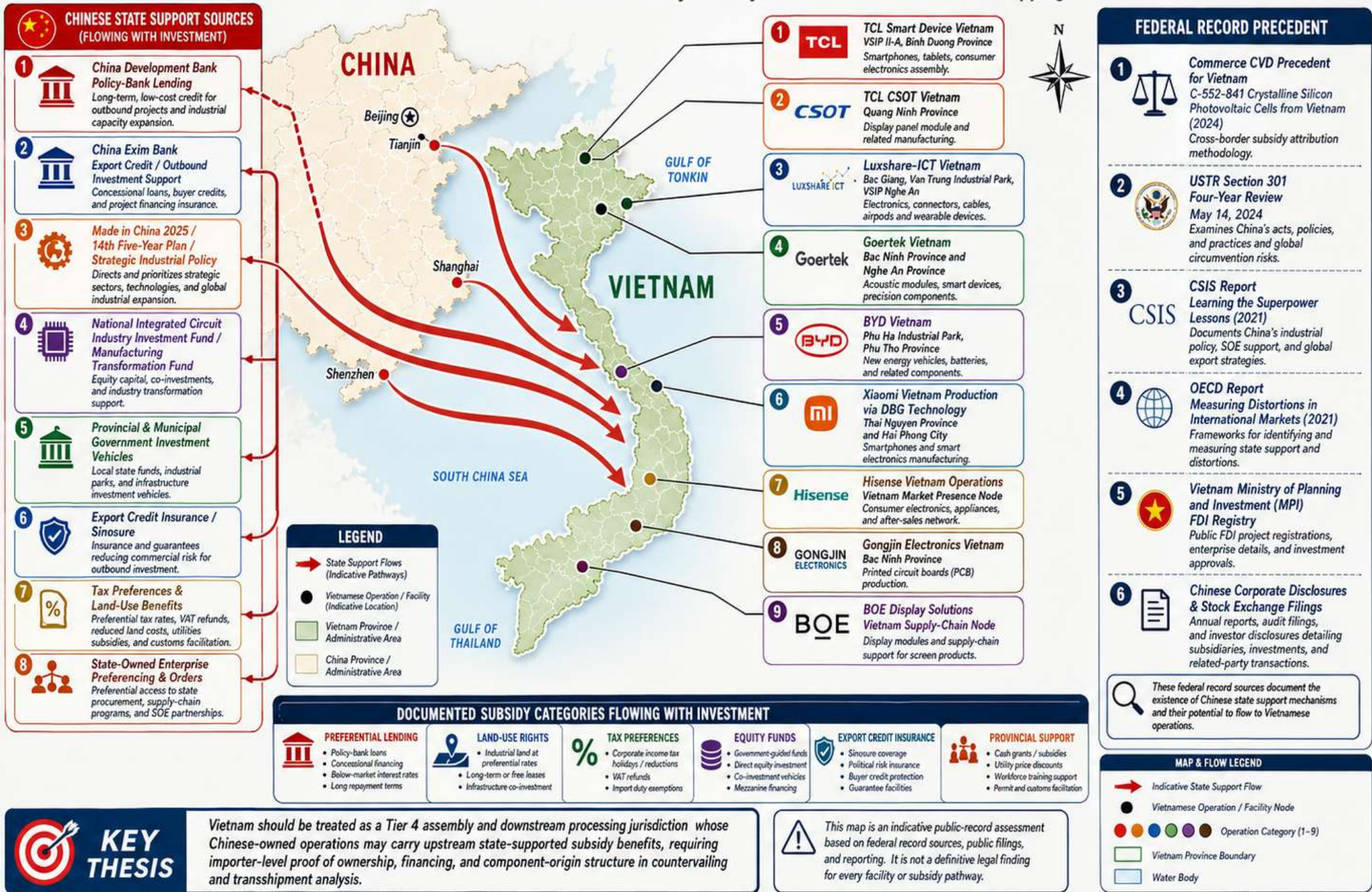
THESIS

Chinese parent-company support may travel into Vietnam-based operations through financing, ownership, and policy-linked expansion, making third-country final assembly an incomplete proxy for competitive conditions.

DISCLAIMER: *This map is an indicative assessment based on public records, sector reports, and routing patterns — not a definitive legal finding and not a determination of subsidy, countervailability, or circumvention in any specific case.*

CHINESE STATE SUBSIDY FLOW TO VIETNAMESE OPERATIONS

Federal Record Sources • Documented Subsidy Pathways • Indicative Public Record Mapping



CHINA → VIETNAM SUBSIDY FLOW MAP

Countervailing Risk • Chinese State Support • Vietnamese Operations

1 CHINESE STATE SUPPORT ORIGIN SOURCES (IN CHINA)



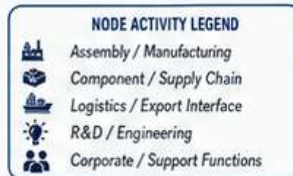
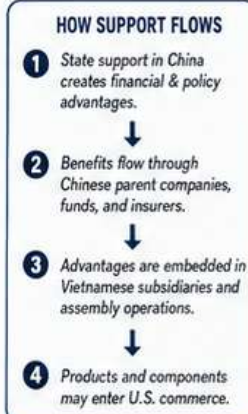
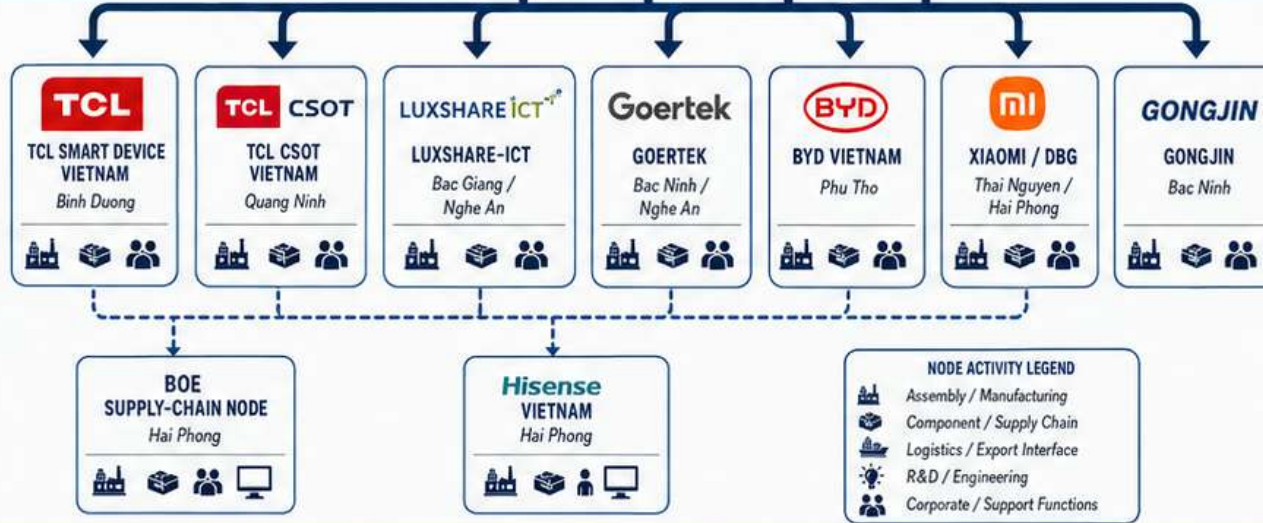
State-directed finance, policy, insurance, and incentives create subsidy benefits.



STATE SUPPORT BENEFITS FLOW INTO OVERSEAS INVESTMENTS & OPERATIONS

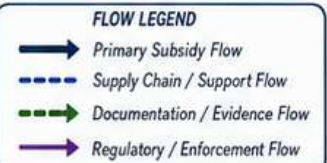
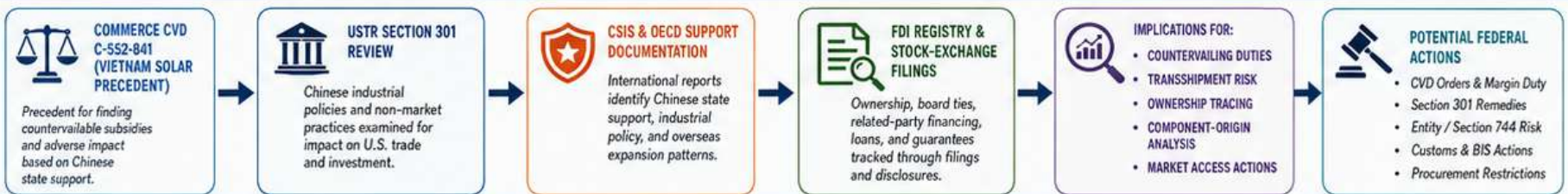
2 VIETNAM OPERATION NODES

Chinese-invested facilities and supply-chain operations in Vietnam.



3 EXPORT IMPLICATIONS & FEDERAL PRECEDENT

Federal authorities analyze and address unfair subsidization risk.



KEY THESIS

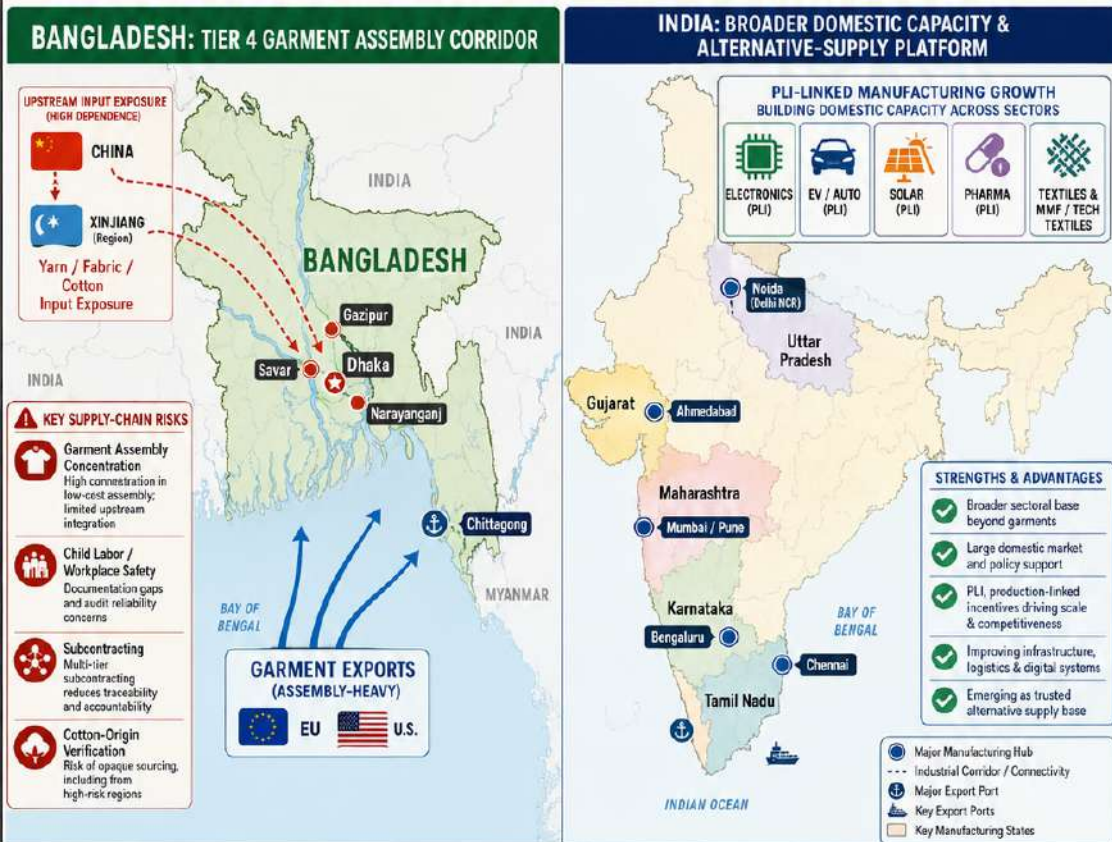
Subsidy benefits can travel with Chinese parent investment into Vietnamese subsidiaries and assembly operations, making ownership structure, financing, and component-origin tracing central to unfair-trade analysis.

DISCLAIMER

This map is indicative and based on public federal-record and public-reporting sources. It reflects potential subsidy flows and risk factors, not a definitive finding for each entity or a legal determination by any agency or court.

BANGLADESH vs INDIA:

SOUTH ASIA SUPPLY-CHAIN RISK & ALTERNATIVE CAPACITY MAP



BANGLADESH =
ASSEMBLY/ROUTING-HEAVY GARMENT CORRIDOR

High exposure to upstream inputs, concentrated assembly, and compliance/documentation risks.

VS

INDIA =
ALTERNATIVE SUPPLY WITH BROADER DOMESTIC CAPACITY

Diverse manufacturing base, policy-backed growth, and capacity across multiple sectors.

SUPPLY-CHAIN RISK & CAPACITY COMPARISON FRAMEWORK			
DIMENSION	BANGLADESH (GARMENT CORRIDOR)	INDIA (ALTERNATIVE SUPPLY PLATFORM)	IMPLICATIONS FOR BUYERS
Upstream Dependence	High dependence on imported yarn, fabric and cotton—significant exposure to China / Xinjiang inputs.	Lower dependence with growing domestic capabilities in fibers, yarns, fabric, and many intermediate inputs.	India offers greater supply security and origin diversity.
Assembly Role	Tier 4 assembly-focused model with limited value addition upstream.	End-to-end manufacturing across multiple sectors—design, components, assembly, and finished goods.	India provides deeper integration and scalability.
Diversification Value	Low diversification; high concentration in garments and a few markets.	High diversification across sectors, states, and export markets.	India reduces concentration risk and enhances resilience.
Key Due-Diligence Priorities	<ul style="list-style-type: none"> Raw material origin verification Factory working conditions & labor rights documentation Subcontracting transparency Audit quality & remediation tracking 	<ul style="list-style-type: none"> Supplier onboarding & KYC Environmental & social compliance Traceability across domestic supply tiers Sector-specific regulatory compliance 	Tailored due diligence remains essential in both geographies.
Logistics & Export Access	Single major port (Chittagong); congestion and capacity constraints.	Multiple major ports and corridors; improving logistics and multimodal access.	India offers greater routing flexibility and redundancy.
Policy & Ecosystem	Limited incentives; compliance and governance gaps remain.	Strong policy push (PLI, incentives), improving ease of doing business, and industrial ecosystem.	Policy tailwinds support long-term capacity build in India.

LEGEND & MAP NOTES

- > Upstream Input Flow (Exposure)
- > Industrial Corridors / Connectivity
- > Garment Exports
- ⚓ Major Export Port
- ⚓ Key Export Ports
- ⚓ Manufacturing Hub
- Key Manufacturing States

SECTORS IN FOCUS (INDIA ADVANTAGE)

- Electronics & Components
- EV / Auto & Auto Components
- Solar PV & Clean Energy
- Pharmaceuticals & APIs
- Textiles, MMF & Technical Textiles
- Engineering & Capital Goods

MEXICO SUPPLY CHAIN RISK ASSESSMENT MAP

COUNTERVAILING + TRANSSHIPMENT + USMCA PREFERENCE LAUNDERING RISK

RISK LEVEL LEGEND

- HIGH RISK** (Red icon): Documented Labor Issues + Chinese Supply Chain Integration
- ELEVATED RISK** (Orange icon): Industry Reports + Chinese Investment + Routing Patterns
- MODERATE RISK** (Yellow icon): Sectoral Concerns + Limited Data
- LOWER RISK** (Green icon): Lower Exposure or Stronger Oversight

PRIMARY U.S. LAND PORTS (EXPORT ROUTES)

San Diego/Otay Mesa | El Paso | Industrial & Machinery | Textiles & Apparel | Agriculture & Food | Aerospace & Defense

Laredo | Eagle | McAllen | Brownsville



SUPPLY CHAIN CORRIDORS

- China to Mexico Assembly (Semi-Knocked Down / Components)
- Mexican Final Assembly & Processing
- Export to U.S. via Land Ports & Sea Ports

REGIONAL RISK ZONES

- NORTHERN BORDER BELT**
Baja California, Sonora, Chihuahua, Coahuila, Nuevo León, Tamaulipas
- BAJÍO & CENTRAL REGION**
Aguascalientes, Guanajuato, Querétaro, Jalisco, San Luis Potosí
- SOUTHERN MEXICO**
Yucatán, Veracruz, Oaxaca, Chiapas, Tabasco, Guerrero

PORT CORRIDORS
Pacific Coast Ports
Gulf Coast Ports

DOCUMENTED RISK FACTORS

- Extensive Chinese FDI in electronics, EV, and industrial sectors
- Use of Chinese-origin components and subassemblies
- USMCA preference used to avoid U.S. duties and restrictions
- Weak labor oversight in some industrial & agricultural sectors
- Emerging FEOC exposure in EV battery and components

EXAMPLES OF CHINESE PRESENCE (NON-EXHAUSTIVE)

- Hisense – Rosarito (Baja California) – TVs & appliances
- LG – Mexicali (Baja California) – Appliances
- TCL – Mexicali (Baja California) – Electronics
- Foxconn – Ciudad Juárez (Chihuahua) – EMS
- BYD – Yucatán – EV Plant (Announced)

PRIMARY EXPORT ROUTES TO U.S.

- Land Ports: Laredo, El Paso, Otay Mesa, Eagle Pass, McAllen, Brownsville
- Pacific Ports: Ensenada, Manzanillo, Lázaro Cárdenas
- Gulf Ports: Veracruz, Altamira
- Air Cargo: Mexico City, Guadalajara, Monterrey

KEY INDUSTRIES & SECTORS AT RISK

ELECTRONICS & EMS Assembly, TVs, Appliances, Components, Solar inverters	High in Border Belt & Northern States
AUTOMOTIVE & EV Automotive Assembly, EV Components, Batteries	High in Bajío, Coahuila, Nuevo León
INDUSTRIAL MACHINERY Machinery, Electrical Equipment, Metal Fabrication	Moderate to High Nationwide
TEXTILES & APPAREL Apparel, Footwear, Home Textiles	Moderate Northern & Central
AGRICULTURE & FOOD Chile Peppers, Coffee, Sugarcane, Tomatoes	Moderate Southern & Central
AEROSPACE & DEFENSE Aerospace Parts, Defense Components	Moderate to High Bajío Region
OTHER MANUFACTURING Plastics, Chemicals, Packaging, Furniture	Moderate Nationwide

FEDERAL RECORD SOURCES

- USMCA Article 4 – Rules of Origin & Substantial Transformation
- 19 CFR Part 182 – USMCA Verification & Recordkeeping
- USMCA Chapter 23 – Rapid Response Labor Mechanism (Art. 31-A)
- USMCA Chapter 24 – Environment (Art. 24.21)
- 2026 USMCA Review – Ongoing Trilateral Review Process
- IRA Section 30D – Foreign Entity of Concern (FEOC) Restrictions
- DOL List of Goods – Chile Peppers, Coffee, Sugarcane, Tomatoes
- CBP UFLPA Enforcement – Mexico Detentions on the Rise
- State Department TIP Report – Mexico Labor & Trafficking Risks

COMMON TRANSSHIPMENT / LAUNDERING PATTERNS

- Chinese components shipped to Mexico (OEM / ODM suppliers)
- Minimal processing or light assembly in Mexico
- Claimed "substantial transformation" for USMCA preference
- Export to U.S. via land or sea as "Made in Mexico"
- Circumvention of U.S. tariffs, AD/CVD, UFLPA & other laws

KEY THESIS

Mexico should be treated as a USMCA preference verification jurisdiction with documented Chinese supply chain integration at northern border assembly facilities requiring importer-level proof of Mexican value-added content before USMCA-origin treatment applies.

DISCLAIMER: This map is an indicative risk assessment based on public federal record, academic research, and published reporting. It does not constitute a definitive legal finding of forced labor or violations by any facility or entity. Use for risk assessment, due diligence, and enforcement support.

Sources: U.S. Customs and Border Protection (CBP) | U.S. Department of Labor (DOL) | U.S. Department of State | USTR | Federal Register | Commerce | Public Reporting | Academic Research

VIETNAM OPERATIONS WITH CHINESE STATE-SUPPORT EXPOSURE

Indicative Countervailing / Transshipment / Ownership-Tracing Map

CHINA

STATE-SUPPORT SOURCES

CDB
China Development Bank

China Exim
Export-Import Bank of China

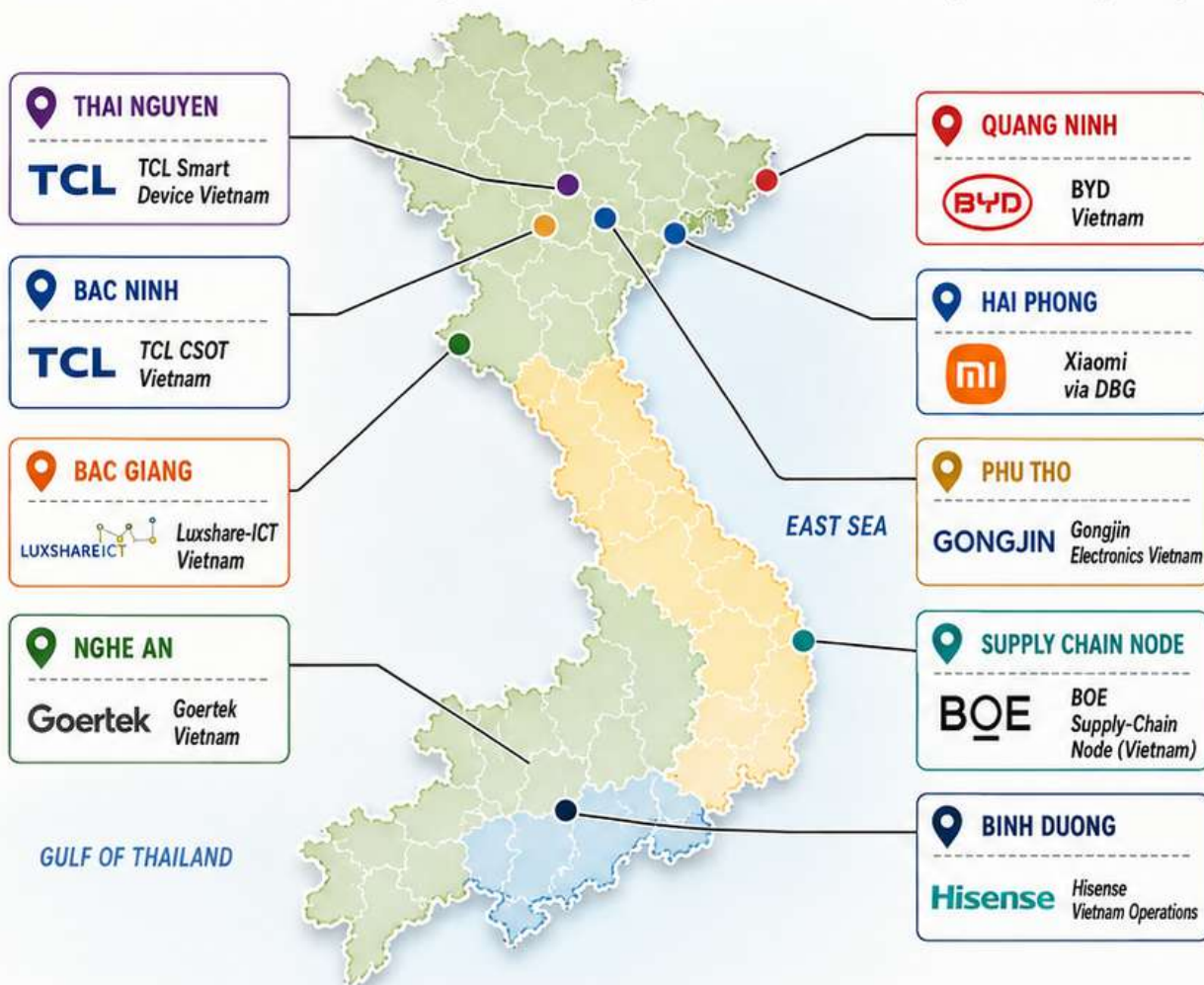
Industrial Policy
Made in China 2025 and sector plans

State-Guided Funds
National & provincial investment funds

Provincial Vehicles
SOEs and local investment platforms

Sinosure
Export credit insurance and guarantees

Land & Tax Incentives
Preferential land, tax, and fee concessions



PRECEDENT & SOURCES

Commerce CVD C-552-841
Certain Chinese-Made Steel Products (2020)

USTR 301 Four-Year Review (2024)
China's Acts, Policies and Practices

CSIS (2021)
Chinese Industrial Subsidies and Overcapacity

OECD Distortions Reports (2019-2023)
Impact of State Support

Chinese Corporate Filings
Annual reports, prospectuses, stock exchange filings

Vietnam FDI Registry
MPI & provincial investment portals

KEY ANALYTICAL USES

1. COUNTERVAILING ANALYSIS

2. ANTI-CIRCUMVENTION ANALYSIS

3. OWNERSHIP TRACING

4. FINANCING TRACING

5. SUPPLIER DUE DILIGENCE

6. PUBLIC-INTEREST RECORD BUILDING

THESIS

Chinese parent-company support may travel into Vietnam-based operations through financing, ownership, and policy-linked expansion, making third-country final assembly an incomplete proxy for competitive conditions.

DISCLAIMER: This map is an indicative assessment based on public records, sector reports, and routing patterns — not a definitive legal finding and not a determination of subsidy, countervailability, or circumvention in any specific case.

INDIA SUPPLY DIVERSIFICATION & LABOR-RISK ASSESSMENT MAP

Alternative supply and emerging manufacturing capacity map.

INDIA: A RELIABLE ALTERNATIVE SUPPLY PARTNER

- Large, skilled workforce with cost competitiveness
- Strong domestic demand and policy support
- Deepening integration with U.S. and allied economies
- Expanding manufacturing base with global quality standards
- Resilient supply chains across diverse sectors

ALIGNING WITH U.S. SUPPLY-CHAIN DIVERSIFICATION

- Policy alignment & trade cooperation
- Resilient & transparent supply chains
- Innovation, sustainability & shared values

BUILDING CAPACITY. EXPANDING CHOICE.

India is rapidly scaling manufacturing across priority sectors through PLI schemes, industrial corridors, and world-class infrastructure.

Strong domestic base. Global reach.

LEGEND

- Major Manufacturing Hub
- Other Key Industrial City
- Major Export Port
- Domestic Industrial Linkages (Industrial Corridors & Clusters)
- Export Routes - Global Markets

SECTORS COVERED

- Electronics Assembly
- Semiconductors / Components
- Auto / EV
- Textiles / Apparel
- Pharmaceuticals / Chemicals
- Renewable Energy / Solar Manufacturing

UNITED STATES

West Coast Ports (Seattle, Los Angeles, Oakland)

East Coast Ports (New York, Savannah, Norfolk)

MADE IN INDIA FOR THE WORLD

EUROPE
Rotterdam, Hamburg, Antwerp, Felixstowe

MIDDLE EAST
Dubai, Jebel Ali, Doha

EAST ASIA
Singapore, Hong Kong, Tokyo, Shanghai

EXPORT ROUTES TO U.S. & GLOBAL MARKETS



UTTAR PRADESH
Emerging manufacturing hub with strong industrial estates & connectivity

GUJARAT
Strong ecosystem for electronics, chemicals, pharma & renewables

MAHARASHTRA
Diverse industrial base across auto, electronics, pharma & chemicals

TELANGANA / ANDHRA PRADESH
Advanced manufacturing, EV ecosystem & electronics growth

KARNATAKA
Technology, electronics and engineering manufacturing strength

TAMIL NADU
Auto, EV, electronics, textiles & renewable energy leadership

PLI-SUPPORTED REGIONS & EMERGING ASSEMBLY CAPACITY

UTTAR PRADESH (Noida-Greater Noida)

- Electronics Manufacturing Cluster
- IT Hardware & EMS
- Industrial Corridor Connectivity

GUJARAT (Ahmedabad / Sanand)

- Electronics & Semiconductors
- Solar PV & Renewable Equipment
- Chemicals & Specialty Materials

MAHARASHTRA (Pune / Mumbai)

- Auto & Auto Components
- Electronics & EMS
- Pharmaceuticals & Chemicals

KARNATAKA (Bengaluru)

- Semiconductors & Design
- Electronics & Precision Engineering
- Aerospace & Deep Tech

TELANGANA / ANDHRA PRADESH (Hyderabad / Vijayawada)

- Electronics & Semiconductor Units
- EV & Battery Ecosystem
- API & Pharma Manufacturing

TAMIL NADU (Chennai)

- Auto & EV Manufacturing
- Electronics & EMS
- Textiles & Renewable Energy

* PLI coverage includes multiple schemes across sectors such as Electronics, IT Hardware, Auto, Pharma, Chemicals, Advanced Chemistry Cell (ACC), Solar PV, and Textiles.

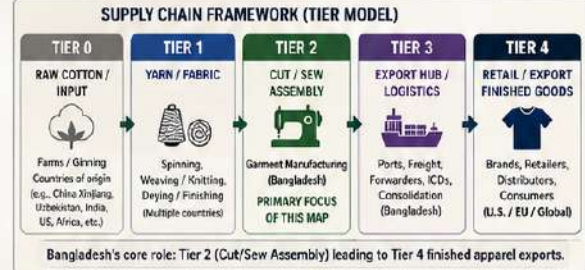
RISK AREAS TO VERIFY (VERIFICATION TOPICS)

- Labor Standards & Working Conditions:** Verify compliance with applicable labor laws, working hours, wages, and workplace safety.
- Subcontracting & Tier Viability:** Confirm responsible subcontracting practices and viability into lower tiers.
- Migrant Labor Practices:** Ensure voluntary employment, no recruitment fees, and access to grievance mechanisms.
- Traceability & Documentation:** Validate traceability of materials, components and finished goods.
- Sector-Specific Due Diligence:** Apply sector-relevant environmental, health, safety and quality due diligence.

These are verification topics to be assessed through proportionate due diligence.

BANGLADESH GARMENT / FORCED-LABOR / TRANSSHIPMENT RISK MAP

Indicative risk assessment based on public reporting, sector exposure, and routing patterns.



- DUE DILIGENCE CHECKLIST (BUYERS & IMPORTERS)**
- Map full supply chain to raw material origin; verify cotton source and chain-of-custody.
 - Conduct supplier mapping to all tiers, including subcontractors and home-based work.
 - Review labor practices: age verification, working hours, wages, recruitment fees.
 - Validate workplace safety: building integrity, fire safety, electrical, EHS systems.
 - Assess remediation systems: grievance mechanisms, worker representation.
 - Verify certifications & audits (e.g., RSC, ISO, BSCI, WRAP, OEKO-TEX® where applicable).
 - Check export & logistics transparency: invoices, packing lists, B/Ls, parties to transactions.
 - Monitor continuously; require corrective action plans and periodic re-audits.
- Document everything. Maintain audit trail and escalation protocols.

THAILAND FORCED-LABOR / COUNTERVAILING / TRANSSHIPMENT RISK MAP

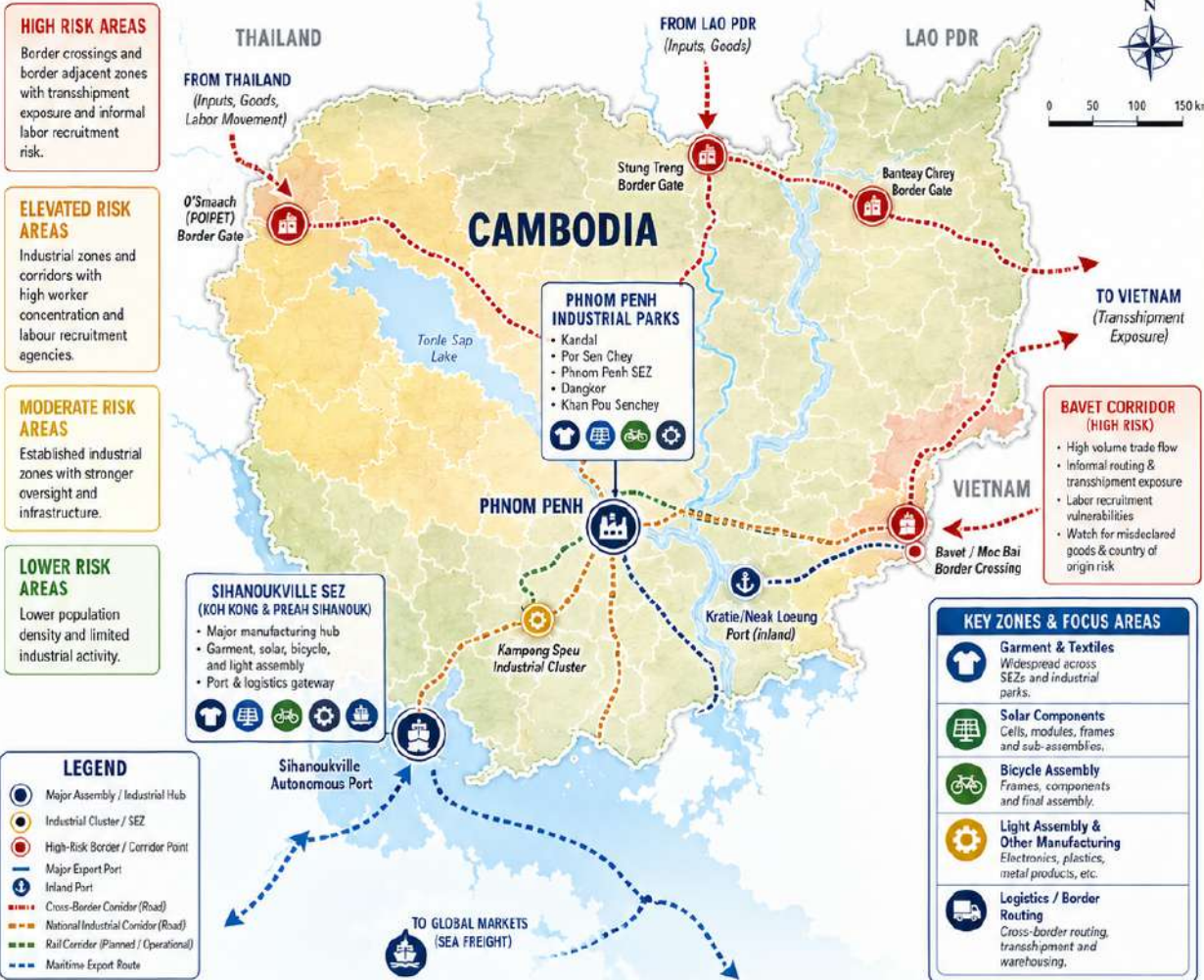
Indicative risk assessment for EV, battery, electronics, solar, and industrial routing patterns.



Indicative risk map based on public reporting, sector exposure, and routing patterns – not a definitive legal finding for every site.

CAMBODIA FORCED-LABOR / COUNTERVAILING / TRANSSHIPMENT RISK MAP

Indicative risk assessment for garment, solar, bicycle, and cross-border routing exposure.



- ### HOW TO USE THIS MAP
1. Verify supplier location. Confirm exact factory / SEZ and industrial park identity.
 2. Confirm SEZ & zone identity. Validate SEZ operator, license status, and tenant list.
 3. Assess border routing risk. Review supplier logistics, tracking routes, and cross-border exposure.
 4. Trace upstream input origin. Identify source of key inputs and sub-components.
 5. Confirm export port & market. Understand export port, routing mode, and final destination.
- Use for risk-based due diligence and document your findings.

! Indicative risk map based on public reporting, sector exposure, and routing patterns – not a definitive legal finding for every site.

MALAYSIA FORCED-LABOR / COUNTERVAILING / TRANSSHIPMENT RISK MAP

Indicative risk assessment for semiconductor packaging, electronics, palm oil, and downstream assembly routing.



! Indicative risk map based on public reporting, sector exposure, and routing patterns – not a definitive legal finding for every site.

MEXICO FORCED-LABOR / COUNTERVAILING / TRANSSHIPMENT RISK MAP

Indicative risk assessment for USMCA preference laundering, cross-border assembly, and industrial routing exposure.



Indicative risk map based on public reporting, sector exposure, and routing patterns – not a definitive legal finding for every site.

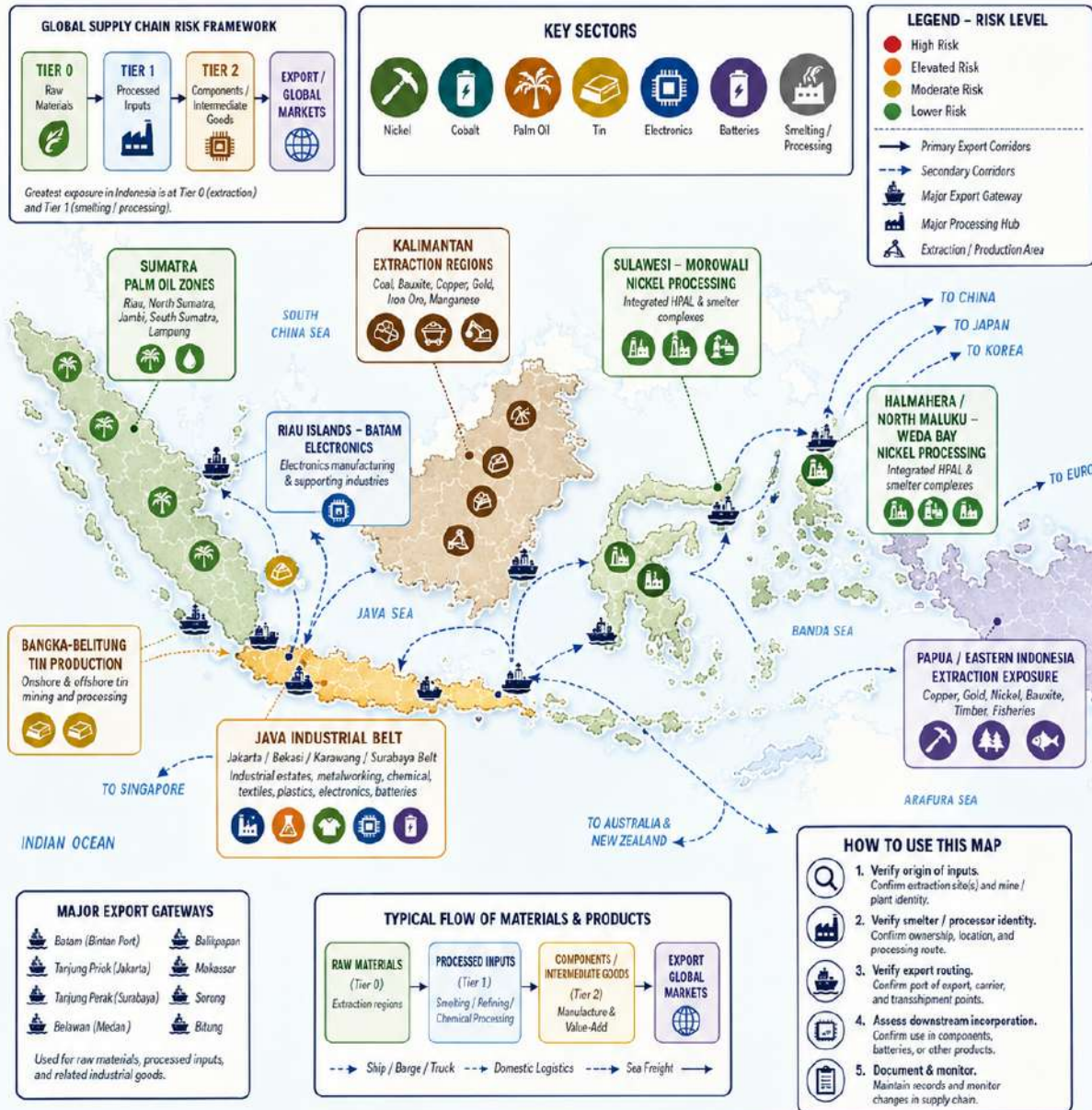


For methodology & references scan QR code or visit yourorganization.org/risk-framework

INDONESIA FORCED-LABOR / COUNTERVAILING / TRANSSHIPMENT RISK MAP

Indicative risk assessment based on public reporting, sector exposure, and routing patterns.

INDONESIA IS CHARACTERIZED BY TIER 0 & TIER 1 UPSTREAM RAW-MATERIALS EXPOSURE, NOT TIER 4 FINAL ASSEMBLY.



INDICATIVE RISK MAP BASED ON PUBLIC REPORTING AND SECTOR EXPOSURE – NOT A DEFINITIVE LEGAL FINDING FOR EVERY SITE.

THAILAND FORCED-LABOR / COUNTERVAILING / TRANSSHIPMENT RISK MAP

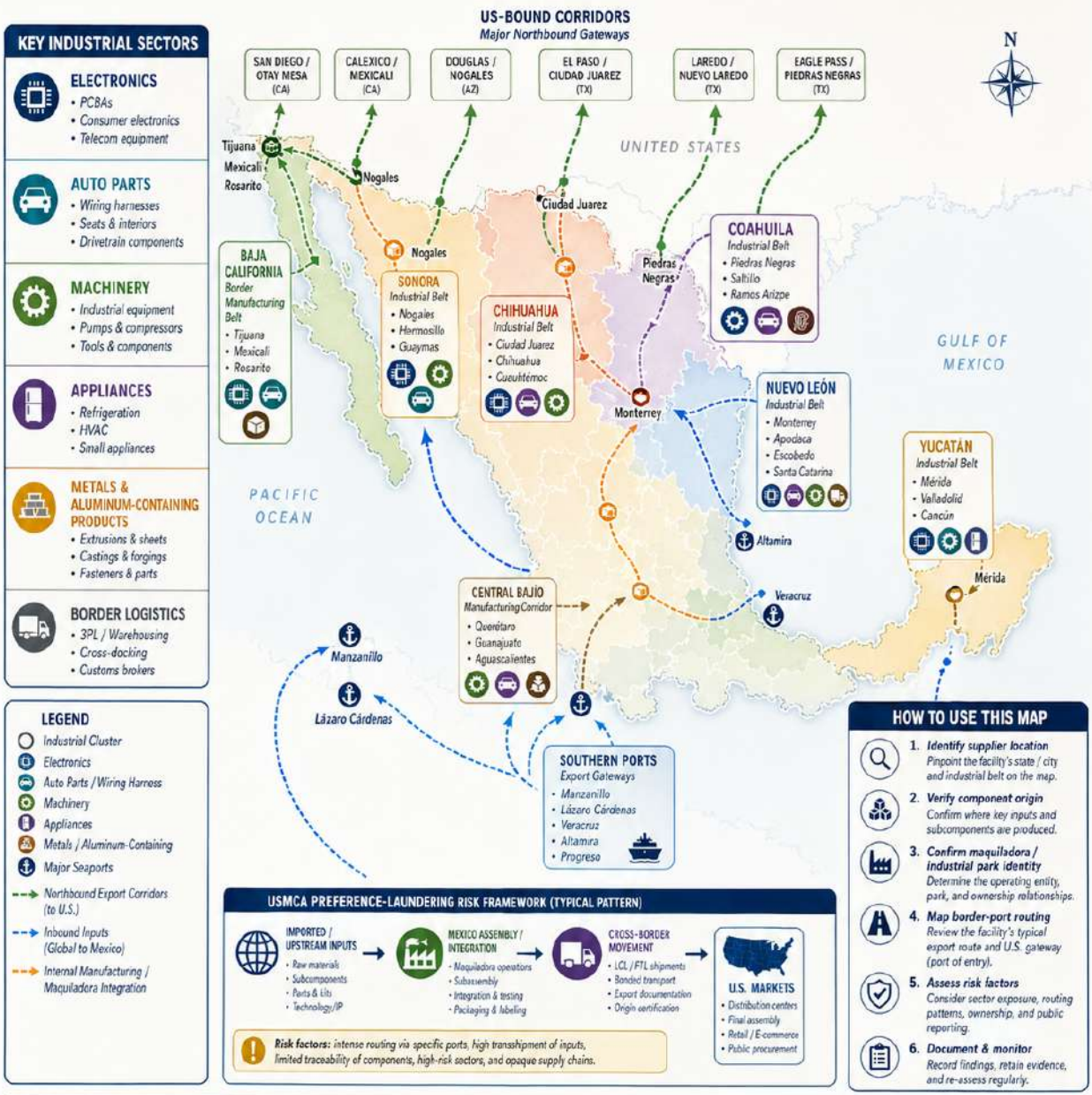
Indicative risk assessment for EV, battery, electronics, solar, and industrial routing patterns.



Indicative risk map based on public reporting, sector exposure, and routing patterns – not a definitive legal finding for every site.

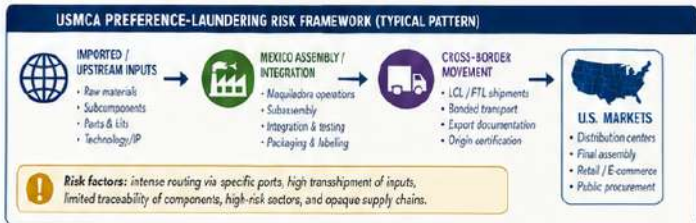
MEXICO FORCED-LABOR / COUNTERVAILING / TRANSSHIPMENT RISK MAP

Indicative risk assessment for USMCA preference laundering, cross-border assembly, and industrial routing exposure.



- ### KEY INDUSTRIAL SECTORS
- ELECTRONICS**
 - PCBAs
 - Consumer electronics
 - Telecom equipment
 - AUTO PARTS**
 - Wiring harnesses
 - Seats & interiors
 - Drivetrain components
 - MACHINERY**
 - Industrial equipment
 - Pumps & compressors
 - Tools & components
 - APPLIANCES**
 - Refrigeration
 - HVAC
 - Small appliances
 - METALS & ALUMINUM-CONTAINING PRODUCTS**
 - Extrusions & sheets
 - Castings & forgings
 - Fasteners & parts
 - BORDER LOGISTICS**
 - 3PL / Warehousing
 - Cross-docking
 - Customs brokers

- ### LEGEND
- Industrial Cluster
 - Electronics
 - Auto Parts / Wiring Harness
 - Machinery
 - Appliances
 - Metals / Aluminum-Containing
 - Major Seaports
 - Northbound Export Corridors (to U.S.)
 - Inbound Inputs (Global to Mexico)
 - Internal Manufacturing / Maquiladora Integration



- ### HOW TO USE THIS MAP
- Identify supplier location**
Pinpoint the facility's state / city and industrial belt on the map.
 - Verify component origin**
Confirm where key inputs and subcomponents are produced.
 - Confirm maquiladora / industrial park identity**
Determine the operating entity, park, and ownership relationships.
 - Map border-port routing**
Review the facility's typical export route and U.S. gateway (port of entry).
 - Assess risk factors**
Consider sector exposure, routing patterns, ownership, and public reporting.
 - Document & monitor**
Record findings, retain evidence, and re-assess regularly.

VIETNAM LABOR SECTOR EXPOSURE MAP

Regional clusters for garments, textiles, leather, rice, rubber, sugarcane, tea, timber, tobacco, and seafood.



KEY THESIS

Vietnam should be assessed by region, sector, and supply route — not just by the final export label.

VIETNAM LABOR SECTOR EXPOSURE MAP

Regional clusters for garments, textiles, leather, rice, rubber, sugarcane, tea, timber, tobacco, and seafood.



KEY THESIS

Vietnam should be assessed by region, sector, and supply route — not just by the final export label.



DISCLAIMER: This is an indicative sector-risk map based on public reporting and sector exposure, not a definitive legal finding for every facility.



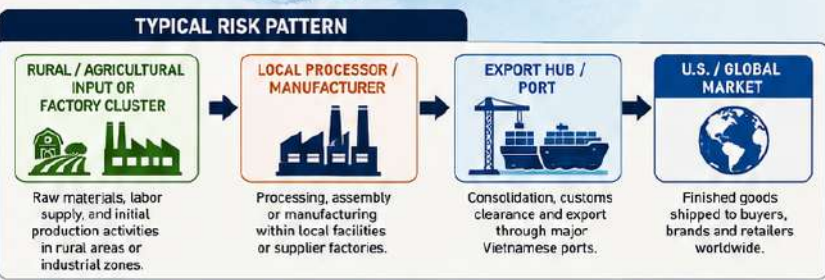
Date: May 2024

VIETNAM LABOR SECTOR RISK & SUPPLY CORRIDOR MAP

FROM INLAND PRODUCTION ZONES TO EXPORT GATEWAYS



MAIN SECTORS	
	GARMENTS Ready-made clothing for domestic brands and export markets.
	TEXTILES Fabric production including yarn, weaving, knitting and finishing.
	LEATHER Leather tanning and leather goods for footwear, bags, belts, and accessories.
	RICE Staple grain grown in Mekong Delta and Northern plains for global export.
	RUBBER Natural rubber latex and rubber products for industrial use.
	SUGARCANE Grown for sugar production and related by-products.
	TEA Cultivated in highland regions for domestic use and export.
	TIMBER Sawnwood, veneers and wood products for construction and furniture.
	TOBACCO Cultivated leaf for cigarettes and related tobacco products.
	SEAFOOD Farmed and wild-caught seafood including shrimp, fish, and marine products.



LEGEND

	KEY CITY / PRODUCTION NODE
	EXPORT PORT / GATEWAY
	PRIMARY SUPPLY FLOW CORRIDOR
	SECONDARY / FEEDER FLOW
	MARITIME EXPORT ROUTE
	HIGHLAND PRODUCTION AREA
	INDUSTRIAL ZONE / CLUSTER
	AGRICULTURAL PRODUCTION AREA
	AQUACULTURE / FISHERIES AREA

DISCLAIMER: This map is for risk assessment and due diligence purposes only and does not constitute or imply any definitive accusation of labor violations or illegal activities.

CHINA → VIETNAM COMPONENT-ORIGIN & TRANSSHIPMENT MAP

TRACE THE INPUT. FOLLOW THE FLOW. VERIFY THE ORIGIN.

- ### CORE TRACING QUESTIONS
- 1 What is the upstream Chinese input?
 - 2 Where was final assembly?
 - 3 Which Vietnam node handled integration?
 - 4 What port exported it?
 - 5 What documents identify the component origin?

CHINA SOURCE REGIONS & SECTOR CLUSTERS

Key manufacturing bases supplying inputs to Vietnam

- LCD / DISPLAY INPUTS**
Examples: Panels, backlights, glass substrates, drivers
Key hubs: Shenzhen, Guangzhou, Hefei, Suzhou
- ELECTRONICS COMPONENTS**
Examples: ICs, resistors, capacitors, PCBs, connectors
Key hubs: Shenzhen, Dongguan, Suzhou, Shanghai
- SOLAR INPUTS**
Examples: Cells, wafers, glass, EVA/PVB, junction boxes
Key hubs: Wuxi, Changzhou, Jiangsu, Hefei, Anhui
- TEXTILE / FABRIC INPUTS**
Examples: Yarn, fabric, trims, dyes, zippers
Key hubs: Keqiao (Shaoxing), Foshan, Guangzhou
- AUTO-PART INPUTS**
Examples: Wiring harnesses, plastic parts, sensors, seats
Key hubs: Guangzhou, Ningbo, Wuhan, Changchun
- ALUMINUM INPUTS**
Examples: Ingots, billets, sheets, extrusions, foil
Key hubs: Nanhai (Foshan), Wuxi, Chongqing

CROSS-BORDER CORRIDORS TO VIETNAM

Inputs consolidated in China, routed into Vietnam via multi-modal corridors

- LCD / DISPLAY**
Shenzhen / Guangzhou → Hanoi / Hai Phong
- ELECTRONICS COMPONENTS**
Shenzhen / Dongguan → Bac Ninh / Thai Nguyen
- SOLAR INPUTS**
Jiangsu / Anhui → Hai Phong / Da Nang
- TEXTILE / FABRIC INPUTS**
Zhejiang / Guangdong → Central & Southern Vietnam
- AUTO-PART INPUTS**
Guangdong / Hubei → Binh Duong / Dong Nai
- ALUMINUM INPUTS**
Guangdong / Chongqing → Vietnam-wide Industrial Zones

VIETNAM RECEIVING, ASSEMBLY & EXPORT NODES

Key industrial / assembly zones that integrate inputs and prepare goods for export

- HANOI - BAC NINH - THAI NGUYEN ELECTRONICS CORRIDOR**
Electronics, components, precision parts, ICT devices
- HAI PHONG EXPORT GATEWAY**
Major seaport for containers from North Vietnam and China corridors
- DA NANG / CHU LAI CENTRAL ASSEMBLY NODE**
Assembly, fabrication, and value-add integration for central region
- HO CHI MINH CITY - BINH DUONG - DONG NAI SOUTHERN MANUFACTURING BELT**
Broad manufacturing base across electronics, textiles, auto parts, machinery

EXPORT OUTBOUND

From Vietnam to U.S. Ports & Global Markets

- HAI PHONG PORT**
- DA NANG / CHU LAI PORT**
- CAT LAI PORT (HO CHI MINH CITY)**
- CAI MEP-THI VAI PORT (BA RIA-VUNG TAU)**

U.S. PORTS & GLOBAL MARKETS



SECTOR LEGEND (COLOR = CORRIDOR LANE)

- LCD / Display
- Electronics Components
- Solar Inputs
- Textile / Fabrics
- Auto-Part Inputs
- Aluminum Inputs

DISCLAIMER: This map is an indicative risk assessment based on public reporting, sector exposure, and routing patterns — not a definitive legal finding for every site.

Sources: U.S. Customs and Border Protection (CBP) | Forced Labor Enforcement Task Force (FLETF)
Public reports & industry sources | Map not to scale | For risk assessment, due diligence, and enforcement support.

VIETNAM-CHINA ROUTING DOCTRINE MAP

Routing Framework for Concealment, Transformation & Transshipment Risk



SECTOR ROUTING PATTERNS (6 KEY SECTORS)				
1	LCD PANELS / DISPLAY MODULES (TVs, Monitors, Laptops)	Chinese input (LCD cells, drivers, backlights)	Vietnam assembly / integration (module + bezel + test)	Final product label may show Vietnam.
2	ELECTRONICS / COMPONENTS (PCBs, ICs, Capacitors, Connectors)	Chinese input (components, semiconductors, passives)	Vietnam assembly / integration (SMT, board build, subassembly)	Final product label may show Vietnam.
3	SOLAR COMPONENTS (Solar Cells, Modules, Inverters)	Chinese input (wafers, cells, glass, frames)	Vietnam assembly / integration (lamination, framing, testing)	Final product label may show Vietnam.
4	TEXTILES WITH CHINESE COTTON INPUTS (Yarn, Fabric, Apparel)	Chinese input (cotton, yarn, fabric)	Vietnam assembly / integration (cutting, sewing, finishing)	Final product label may show Vietnam.
5	AUTO PARTS (Critical Components)	Chinese input (molds, castings, electrical parts)	Vietnam assembly / integration (machining, subassembly, QA)	Final product label may show Vietnam.
6	ALUMINUM-CONTAINING COMPONENTS (Frames, Housings, Heat Sinks, Enclosures)	Chinese input (aluminum, extrusions, extruded profiles)	Vietnam assembly / integration (CNC, finishing, subassembly)	Final product label may show Vietnam.

KEY DOCTRINE POINTS

- Final assembly country may conceal component origin.**
A Vietnam label does not prove that inputs are non-Chinese.
- Identical products may cycle through new SKUs or suppliers.**
Frequent SKU changes or supplier rotations can be used to obscure lineage.
- Downstream goods can hide upstream Chinese parts.**
Complex bills of materials and subassemblies make visibility difficult.
- Route verification and port tracing matter.**
Look at the full path: input origin → Vietnam processing → export port.

KEY THESIS Vietnam should be treated as a component-origin and transshipment-risk jurisdiction, not merely a final assembly country.

i Indicative risk map based on public reporting, sector exposure, and routing patterns — not a definitive legal finding for every site.

CHINA UPSTREAM FORCED LABOR RISK MAP & SUPPLY ROUTES

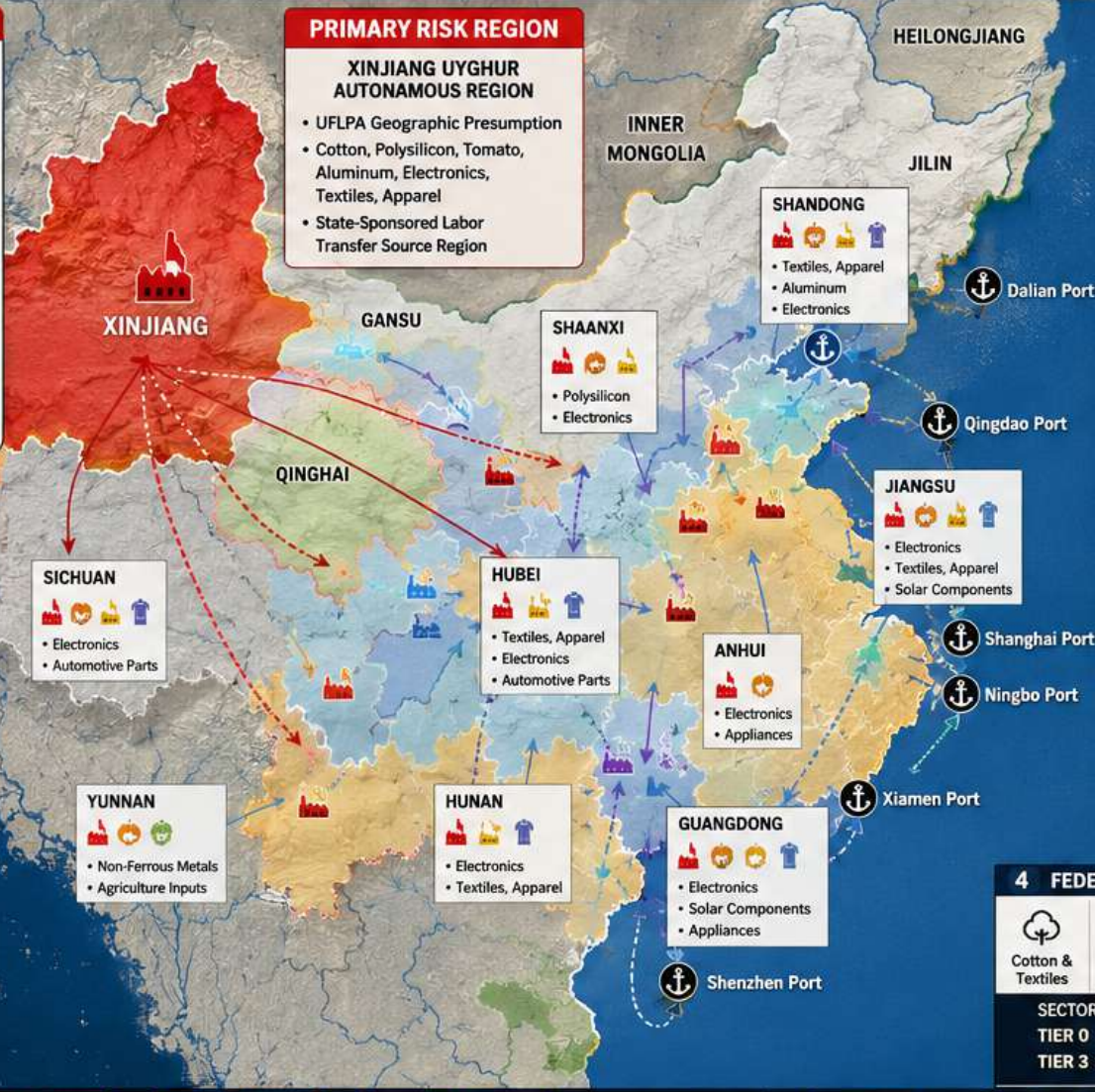
FEDERAL RECORD SOURCES • RISK ASSESSMENT • INDICATIVE ONLY

RISK LEGEND

- EXTREME RISK**
UFLPA Geographic Presumption Xinjiang Region
- VERY HIGH RISK**
UFLPA Entity List Designations High Priority Sectors
- HIGH RISK**
BIS Entity List / FLETF Priority Documented Facilities
- ELEVATED RISK**
Pairing Assistance / Labor Transfer Regions
- MONITORING**
Other Relevant Provinces / Sectors

MAP ICON LEGEND

- UFLPA Entity List Facility
- BIS Entity List Facility
- Pairing Assistance Facility (ASPI Documented)
- Key Industrial Cluster
- Major Port / Export Hub
- Primary Supply Route
- Secondary Supply Route



PRIMARY RISK REGION

XINJIANG UYGHUR AUTONOMOUS REGION

- UFLPA Geographic Presumption
- Cotton, Polysilicon, Tomato, Aluminum, Electronics, Textiles, Apparel
- State-Sponsored Labor Transfer Source Region

SHANDONG

- Textiles, Apparel
- Aluminum
- Electronics

SHAANXI

- Polysilicon
- Electronics

JIANGSU

- Electronics
- Textiles, Apparel
- Solar Components

SICHUAN

- Electronics
- Automotive Parts

HUBEI

- Textiles, Apparel
- Electronics
- Automotive Parts

ANHUI

- Electronics
- Appliances

YUNNAN

- Non-Ferrous Metals
- Agriculture Inputs

HUNAN

- Electronics
- Textiles, Apparel

GUANGDONG

- Electronics
- Solar Components
- Appliances

1 UFLPA ENTITY LIST (19 U.S.C. 1307)

SECTOR	NAMED ENTITIES (EXAMPLES)	LOCATION
Polysilicon	Hoshine Silicon Industry Co., Ltd.	Xinjiang
	Daqo New Energy Corp.	Xinjiang
	GCL-Poly Energy Holdings Ltd. & Subsidiaries	Xinjiang
Cotton / Textiles	Xinjiang Production & Construction Corps (XPCC)	Xinjiang
	Esquel Group (Xinjiang) Co., Ltd.	Xinjiang
Tomato Products	Xinjiang Zhongtai Chemical Co., Ltd.	Xinjiang
	Xinjiang Luwei Tomato Products Co., Ltd.	Xinjiang
Aluminum	Xinjiang East Hope Nonferrous Metals Co., Ltd.	Xinjiang
	Xinjiang East Hope Mg Co., Ltd.	Xinjiang
Other (Electronics, etc.)	(See current UFLPA Entity List in Federal Register)	Various

2 BIS ENTITY LIST (15 CFR PART 744, SUPP. 4)

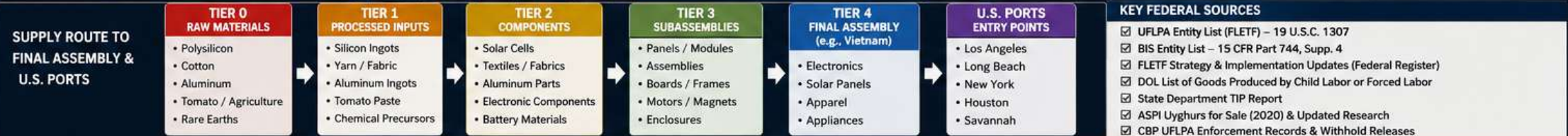
SECTOR	NAMED ENTITIES (EXAMPLES)	LOCATION
Surveillance / Technology / AI	Hikvision Digital Technology Co., Ltd.	Hangzhou
	Dahua Technology Co., Ltd.	Hangzhou
	iFlytek Co., Ltd.	Hefei, Anhui
	SenseTime Group Ltd.	Beijing
	Megvii Technology Ltd.	Beijing
Other Entities (Human Rights / FL Concerns)	(See current BIS Entity List in Federal Register)	Various

3 PAIRING ASSISTANCE PROGRAM (ASPI "UYGHURS FOR SALE" 2020) ~83 Factories Documented Accepting Xinjiang Labor Transfers

PROVINCE / REGION	SECTORS (EXAMPLES)	FACILITY COUNT (ASPI)
Anhui	Electronics, Textiles, Automotive Parts	11+
Hubei	Textiles, Electronics, Automotive Parts	10+
Hunan	Electronics, Textiles, Other Manufacturing	9+
Jiangsu	Electronics, Apparel, Machinery	12+
Shandong	Textiles, Apparel, Electronics	10+
Sichuan	Electronics, Automotive Parts	8+
Zhejiang	Textiles, Electronics, Appliances	11+
Other Provinces	Various Manufacturing Sectors	12+

4 FEDERAL PRIORITY SECTORS (FLETF STRATEGY)

SECTOR FLOWS INTO TIER STACKED FRAMEWORK
 TIER 0 Raw Materials → TIER 1 Processed Inputs → TIER 2 Components →
 TIER 3 Subassemblies → TIER 4 Final Assembly (e.g., Vietnam) → U.S. Ports



KEY FEDERAL SOURCES

- ☑ UFLPA Entity List (FLETF) – 19 U.S.C. 1307
- ☑ BIS Entity List – 15 CFR Part 744, Supp. 4
- ☑ FLETF Strategy & Implementation Updates (Federal Register)
- ☑ DOL List of Goods Produced by Child Labor or Forced Labor
- ☑ State Department TIP Report
- ☑ ASPI Uyghurs for Sale (2020) & Updated Research
- ☑ CBP UFLPA Enforcement Records & Withhold Releases

DISCLAIMER: INDICATIVE RISK ASSESSMENT BASED ON PUBLIC REPORTING AND FEDERAL RECORDS.

This map is for risk assessment and supply chain transparency purposes only. Inclusion of any facility, region, or sector does not constitute a definitive finding of forced labor in any specific facility and subject to change based on updates to federal records and further information.

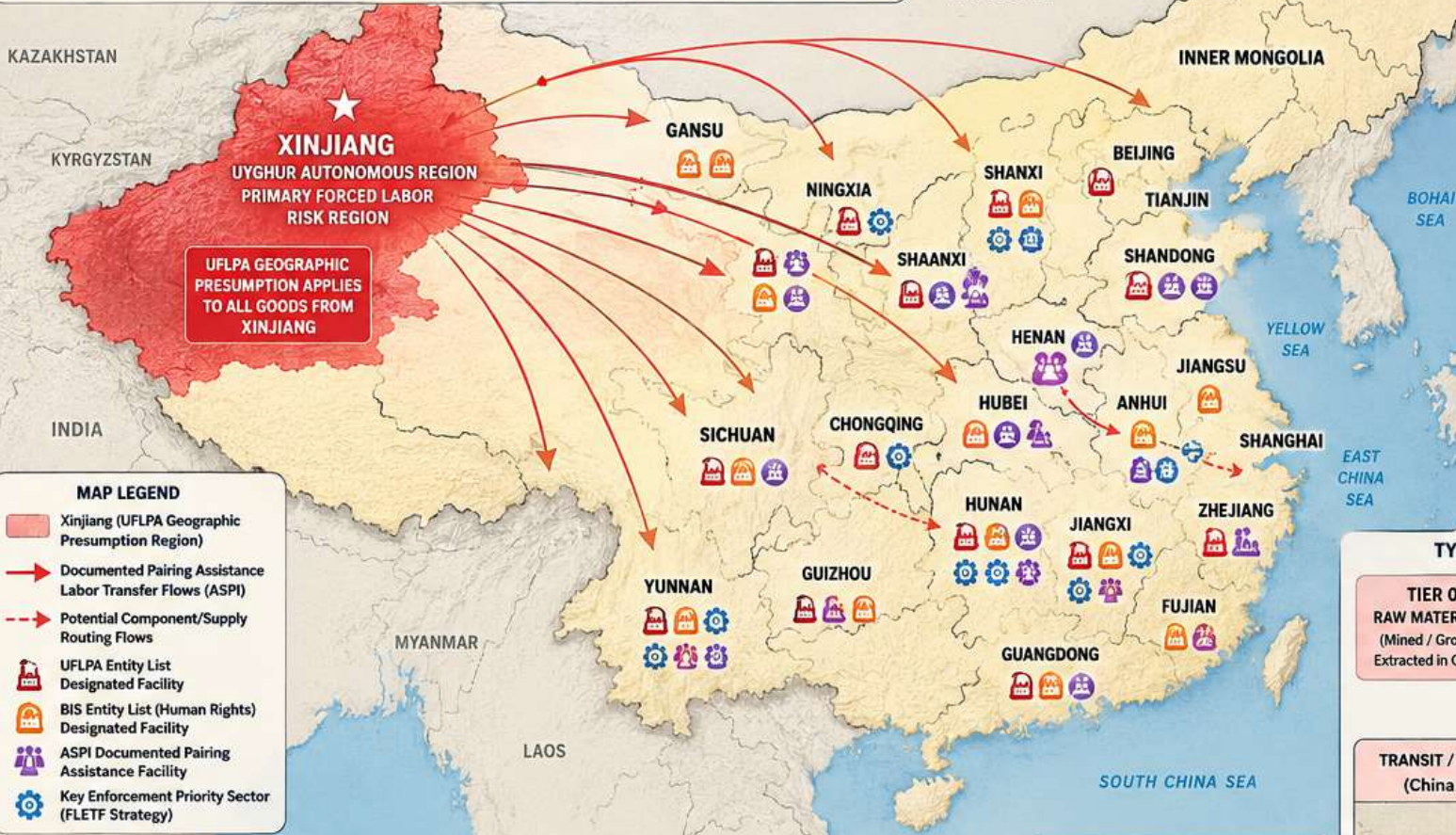
LAST UPDATED: MAY 2025

CHINA UPSTREAM FORCED LABOR RISK MAP

SOURCE FACILITIES, SECTORS & SUPPLY ROUTES INTO VIETNAM AND GLOBAL MARKETS

INDICATIVE RISK ASSESSMENT BASED ON PUBLIC FEDERAL RECORD & RESEARCH

- UFLPA ENTITY LIST Designated Entity
- BIS ENTITY LIST (Human Rights)
- ASPI DOCUMENTED PAIRING ASSISTANCE FACILITIES
- KEY SECTORS OF U.S. ENFORCEMENT PRIORITY (FLETF)



MAP LEGEND

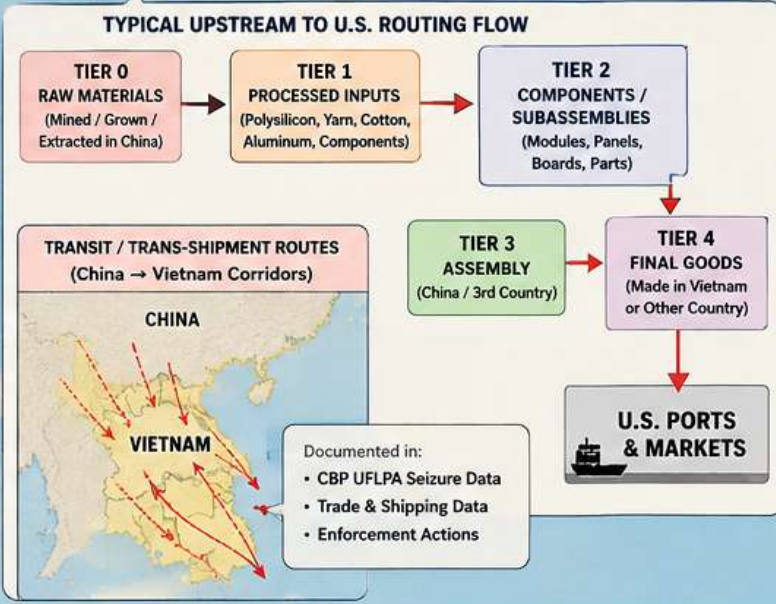
- Xinjiang (UFLPA Geographic Presumption Region)
- Documented Pairing Assistance Labor Transfer Flows (ASPI)
- Potential Component/Supply Routing Flows
- UFLPA Entity List Designated Facility
- BIS Entity List (Human Rights) Designated Facility
- ASPI Documented Pairing Assistance Facility
- Key Enforcement Priority Sector (FLETF Strategy)

- ### EXAMPLES: UFLPA ENTITY LIST (AS OF LATEST PUBLIC UPDATE)*
- Hoshine Silicon Industry Co., Ltd.
 - Daqo New Energy Corp.
 - GCL-Poly Energy Holdings Ltd. & Subsidiaries
 - East Hope Group Co., Ltd. & Related Entities
 - Xinjiang Production and Construction Corps (XPCC) & Subsidiaries
 - Esquel Group Entities (Xinjiang)
 - Other Entities Added Through FLETF Determinations
- *See current Federal Register notices for complete, updated list.

- ### ASPI "UYGHURS FOR SALE" (2020) - PAIRING ASSISTANCE PROGRAM*
- Documented ~83 Chinese & Foreign Factories Accepting Xinjiang Labor Transfers
 - Provinces Include: Anhui, Hubei, Hunan, Jiangsu, Shandong, Sichuan, Zhejiang and Others
 - Sectors: Electronics, Automotive, Apparel, Footwear, Textiles, Home Goods, Food Processing, Others

- ### OTHER KEY PUBLIC RECORD SOURCES
- BIS Entity List (15 CFR Part 744, Supp. 4)
 - FLETF Strategy & Implementation Updates (Federal Register)
 - DOL List of Goods Produced by Child Labor or Forced Labor
 - State Department TIP Report (Tier 3: China)
 - CBP UFLPA Enforcement Statistics

HIGH-RISK SECTORS & FEDERAL RECORD SOURCES		
	POLYSILICON & SOLAR INPUTS (Polysilicon, Silicon Wafers) Examples: Hoshine, Daqo, GCL-Poly, East Hope Group Entities	Source: UFLPA Entity List FLETF Strategy (Polysilicon Priority)
	COTTON, TEXTILES & APPARAL INPUTS (Xinjiang Cotton, Yarn, Fabric) Examples: XPCC & Subsidiaries, Esquel Group Entities	Source: UFLPA Entity List FLETF Strategy (Cotton Priority)
	TOMATO PRODUCTS (Tomato Paste, Processing) Examples: Xinjiang Production & Processing Facilities	Source: UFLPA Entity List FLETF Strategy (Tomato Priority)
	ALUMINUM & DOWNSTREAM PRODUCTS (Aluminum, Extrusions, Foil) Examples: Xinjiang Smelters & Processing Facilities	Source: FLETF Strategy (Expanding Priority)
	ELECTRONICS & COMPONENTS (Assembly, Circuit Boards, Surveillance Tech) Examples: Facilities in ASPI Report, BIS Entity List Entities	Source: ASPI Uyghurs for Sale BIS Entity List (Human Rights)
	AUTOMOTIVE, MACHINERY & OTHER GOODS (Motors, Parts, Industrial Components) Examples: ASPI Documented Facilities in Multiple Provinces	Source: ASPI Uyghurs for Sale FLETF Sector Expansions



DISCLAIMER: This map is an indicative risk assessment based on public federal record, academic research, and published reporting. It does not constitute a definitive legal finding of forced labor for any facility not designated on the UFLPA Entity List or other official federal lists. Use for risk assessment, due diligence, and enforcement support.

Sources: U.S. Customs and Border Protection (CBP) Forced Labor Enforcement Task Force (FLETF) Federal Register | BIS | DOL | ASPI | State Dept. | Academic Research

VIETNAM-CHINA ROUTING DOCTRINE MAP

Routing Framework for Concealment, Transformation & Transshipment Risk



SECTOR ROUTING PATTERNS (6 KEY SECTORS)						
1	LCD PANELS / DISPLAY MODULES (TVs, Monitors, Laptops)	Chinese input (LCD cells, drivers, backlights)	→	Vietnam assembly / integration (module + bezel + test)	→	Final product label may show Vietnam.
2	ELECTRONICS / COMPONENTS (PCBs, ICs, Capacitors, Connectors)	Chinese input (components, semiconductors, passives)	→	Vietnam assembly / integration (SMT, board build, subassembly)	→	Final product label may show Vietnam.
3	SOLAR COMPONENTS (Solar Cells, Modules, Inverters)	Chinese input (wafers, cells, glass, frames)	→	Vietnam assembly / integration (lamination, framing, testing)	→	Final product label may show Vietnam.
4	TEXTILES WITH CHINESE COTTON INPUTS (Yarn, Fabric, Apparel)	Chinese input (cotton, yarn, fabric)	→	Vietnam assembly / integration (cutting, sewing, finishing)	→	Final product label may show Vietnam.
5	AUTO PARTS (Critical Components)	Chinese input (molds, castings, electrical parts)	→	Vietnam assembly / integration (machining, subassembly, QA)	→	Final product label may show Vietnam.
6	ALUMINUM-CONTAINING COMPONENTS (Frames, Housings, Heat Sinks, Enclosures)	Chinese input (aluminum, extrusions, extruded profiles)	→	Vietnam assembly / integration (CNC, finishing, subassembly)	→	Final product label may show Vietnam.

KEY DOCTRINE POINTS

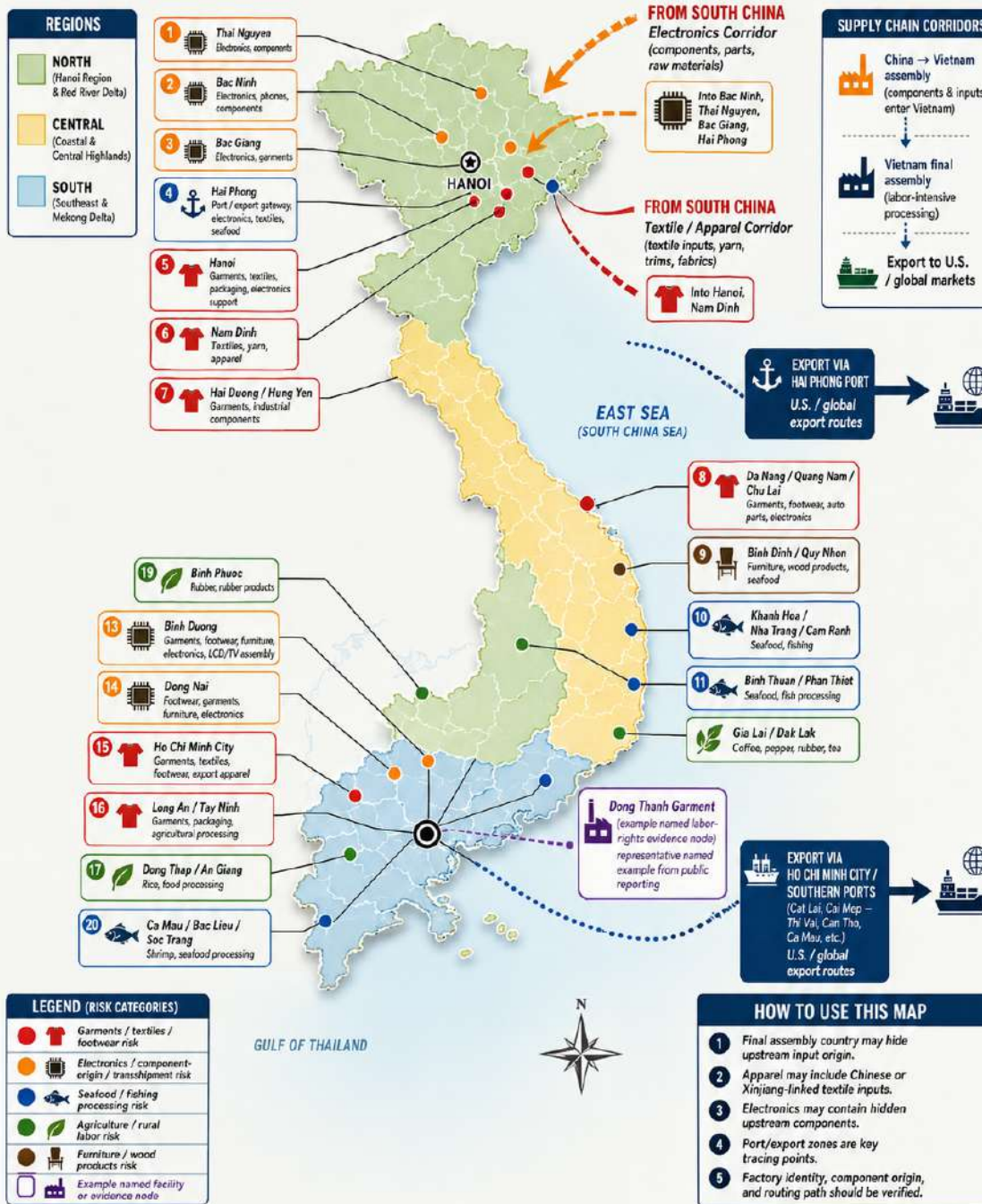
- Final assembly country may conceal component origin.**
A Vietnam label does not prove that inputs are non-Chinese.
- Identical products may cycle through new SKUs or suppliers.**
Frequent SKU changes or supplier rotations can be used to obscure lineage.
- Downstream goods can hide upstream Chinese parts.**
Complex bills of materials and subassemblies make visibility difficult.
- Route verification and port tracing matter.**
Look at the full path: input origin → Vietnam processing → export port.

KEY THESIS Vietnam should be treated as a component-origin and transshipment-risk jurisdiction, not merely a final assembly country.

i Indicative risk map based on public reporting, sector exposure, and routing patterns — not a definitive legal finding for every site.

VIETNAM SUPPLY-CHAIN RISK ASSESSMENT MAP

Forced-labor / child-labor / transshipment-risk nodes and supply routes



Indicative risk map based on public reporting, sector exposure, and routing patterns — not a definitive legal finding for every site.