Speed Up!

Addressing forced labor risks in Taiwan's car, bicycle and electronics industries

Purpose

Taiwan is one of the world's 25 largest economies, known for its sizable electronics industry, while other manufacturing industries - including car parts and bicycles - also contribute to exports.

Majority of Taiwan's 750,000 registered migrant workers are employed in manufacturing, where risking debt bondage is the rule and not the exception, as many incur high debt to pay recruiters exorbitant fees to get jobs. For decades, Taiwanese civil society groups have campaigned against punitive migrant worker conditions, including recruitment fees, but next to no factory cases have reached the international public domain.

This report is a compilation of such factory cases. Its purpose to illustrate how migrant's conditions in Taiwan are directly connected to companies and consumers worldwide. And to illustrate that change-making is possible, even on a shoestring budget. So far, worker reimbursement (\$5m) and fee exemptions (\$2m) add up to estimatedly \$7 million and is expected to reach \$10 million in 2025.

The cases are extracted from investigations done between 2022 and 2025 by investigative journalist Peter Bengtsen and team, including around 200 migrant worker interviews.

Some of the cases have already been published in a dozen articles from The Vietnamese Debt Bondage Gamble (2022) to The Bicycle Industry's Dirty Secret (2025), but are now for easy reference - gathered in one place. The report covers work in progress. New cases are opened continuously, as workers from more factories speak up. So far, four import ban petitions have been filed to the US Customs and Border Protection (CBP) based on results from these cases.

Migrant workers' conditions at Taiwanese manufacturers lack proper attention by foreign buyers, consumers, investors and international civil society organizations.

Encouragingly, foreign buyers and Taiwanese suppliers engaged and remedied migrant workers in several of the report's cases.

Momentum might be increasing, but avoiding debt bondage and other abuses require proper prevention, not just remediation after the damage is done. The report urges everyone to speed up.

The author

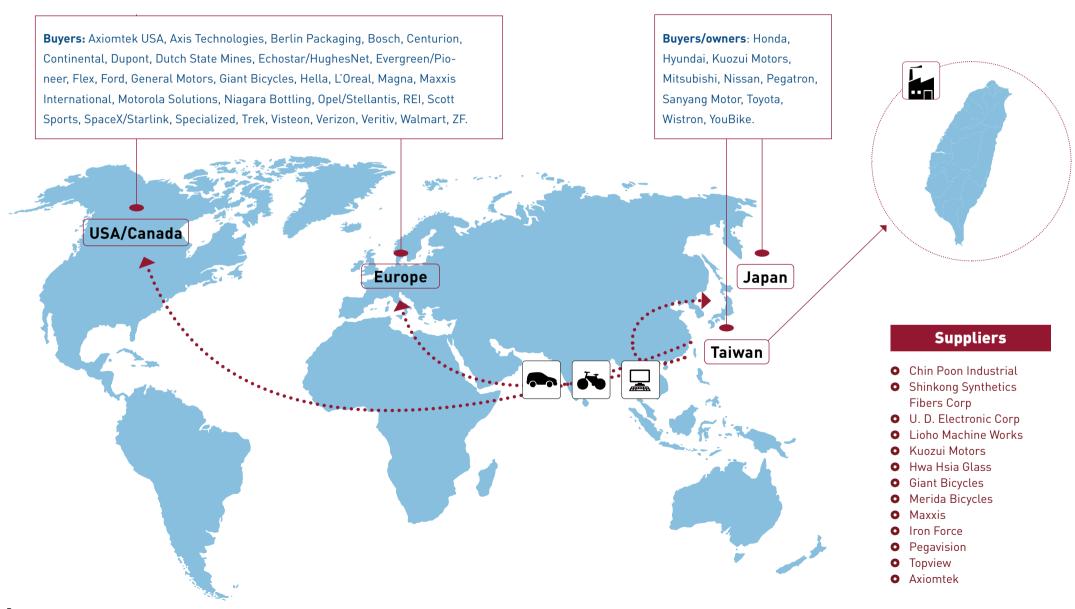
Peter Bengtsen is an investigative journalist and historian of ideas from Denmark. He continuously leads on-theground investigations based on his 15 years of field experience in Asia, Africa and the Middle-East.

His work on global supply chains contributes to financial compensations for workers, corporate sanctions, human rights litigation, exposés of flawed audits, improved supply chain due diligence and public procurement.

The US Department of Labor, the US Department of Homeland Security, the UN's labor agency ILO, the Global Slavery Index and other authorities on forced labour use his work. So do human rights lawyers, ESG investors, auditors and academics.

Peter's investigations are published in 15 languages and 20 countries by media such as The Guardian, Le Monde diplomatique, Der Spiegel, The Diplomat, and more.

Supply chain cases out of Taiwan



Forced labor risks

Taiwan's around 750,000 registered migrant workers arrive from four main countries
- Indonesia, Vietnam, The Philippines and Thailand. The majority, around 480,000, are employed in manufacturing industries, where Vietnamese account for almost 50% of migrant employees. Most are employed in industries, where suppliers of car and bike parts - including fabricated metal products, electronics parts, electrical equipment, motor vehicles and parts - are found, according to detailed statistics by Taiwan's Ministry of Labor.

Taiwan has one of the world's lowest birth rates and is expected to increase its intake of migrant workers, potentially from other countries such as India.

Migrant workers are vulnerable to forced labor due to several factors of which high recruitment fees and related costs, as well as limited freedom to change employers, are key. For decades, workers hired from abroad have paid exorbitant fees to home-country recruiters and Taiwanese labor brokers for jobs and services. As a result, workers borrow significantly from banks and money lenders, often at excessive

interest rates, and thereby risk debt bondage while working in Taiwan to pay off loans.

Debt bondage risks vary across migrant nationalities. Vietnamese workers pay the most to recruiters, often up to \$6,500 which equals around three years of Vietnam's minimum wages and often results in mortgaging family land to obtain a bank loan to finance the fees. Filipino workers pay less, but are often tricked into paying off double the borrowed amount due to high interest rates.

Other migrant vulnerabilities include language barriers, lack of knowledge of laws and rights, lack of support measures or knowledge hereof, lack of organization and representation. Fear of repatriation for speaking up adds to the vulnerabilities.

These issues have been covered for years in reports by e.g. the International Labor Organization (ILO) and the US State Department and are well known to Taiwan's government. However, public attention on supply chain cases connecting foreign buyers to exploitative practices at Taiwanese suppliers is missing.

Indicators of forced labor

ILO's indicators of forced labor are useful to identify and investigate cases. The indicators are based on the definition of forced labor specified in the ILO Forced Labor Convention 1930 (No. 29).

The 11 indicators are: Abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, excessive overtime.

More information: ILO indicators of forced labor.



In most cases the costs incurred before arriving in Taiwan are covered by taking out a loan and if that is too large individuals can easily find themselves in debt bondage".

Taiwan's Ministry of Labor on recruitment fees (2024).

Recommendations

Avoiding forced labor altogether requires proper prevention and workplace monitoring, not just remediation after the damage is done. Excellent research and recommendations are already publicly available, which should be an integral part of due diligence for any company sourcing from Taiwan or elsewhere, where exploitative migrant worker recruitment practices are commonplace.

Highlighting:

- Industry guidance on how to overcome responsible recruitment challenges, by the Fair Labor Association (FLA) and Andy Hall.
- Industry guidance on repaying worker-borne recruitment fees and related costs, by
 The Consumer Goods Forum and Impactt.
- Global framework agreements to respect workers' rights, particularly the right to organize, by multinational corporations and IndustryAll.

Encouraging:

- Taiwan's government to change laws to prohibit all worker-borne fees, paid in Taiwan or elsewhere, including monthly service fees paid to Taiwanese brokers, and that Taiwan's government protect and promote migrant workers' freedom of association.
- European and other countries to adopt or to properly implement import ban legislation prohibiting products made with forced labor to enter. The US Tariff Act of 1930 (2015) and the EU Forced Labor Regulation of 2024 are starting points.
- European and other countries to increase transparency of customs data. In the US, Mexico, India and several South American countries, information on imports and exports by individual companies has been public for years.
- Companies to increase transparency by publicly disclosing supply chain companies and supply chain audit reports.



Foreign workers in Taiwan would be less vulnerable to coercive situations if they didn't become indebted for obtaining their job and a visa. It is important to pay attention to migrant workers' multiple risks of falling into debt bondage or forced labour.

Tomoya Obokata, the United Nations Special Rapporteur on Modern Slavery (2024).

Industries



Cars

Taiwan's automotive industry is highly integrated in global supply chains. Around 90 percent of car components made in Taiwan are exported, with USA followed by Europe as top destinations accounting for around three quarters of exports, according to data by Taiwan's Transportation Vehicle Manufacturers Association (TTVMA).

Taiwan is the third biggest exporter of auto parts to the US, surpassed only by German and Chinese exports. Many US based importers are affiliates or subsidiaries of European, Japanese or Taiwanese firms. US imports by some of the world's largest automotive suppliers, as well as the biggest auto part retailers, include headlamps, car roofs, bumpers, hoods, fenders, and windshields, according to US customs data.

The increased electronification of cars has resulted in a booming electric vehicle (EV) industry in Taiwan, benefitting from Taiwan's pivotal role in global electronics. Audi, BMW, Chrysler, Daimler, Ferrari, Ford, General Motors, Honda, Jaguar, Mazda, Mercedes, Mitsubishi, Nissan, Porsche, Renault, Suzuki, Tesla, Toyota, Volkswagen, Volvo, Yamaha cooperate with Taiwanese firms on components such as battery cells, charging stations, communication chips, printed circuit boards, power and optical components, motor modules, lenses, LEDs, and more, according to Taiwan's External Trade Development Council (TAITRA).

Final car assembly takes place in Taiwan, though domestic sales are relatively small. Around 400,000 new cars are purchased annually by its around 23 million citizens. The six biggest automakers - Kuozui Motors, China Motor Corporation, Honda Taiwan, Yulon, Ford Lioho and Sanyang Motor - account for almost all car production. Kuozui Motors is the biggest manufacturer and the only one with significant exports.

A substantial part of Taiwan-made cars is manufactured by affiliates or subsidiaries of Japanese car companies. Honda Taiwan is a wholly-owned subsidiary of Honda. Kuozui Motors is majority-owned by Toyota, Japan's biggest firm. Yulon Nissan is minority-owned by Nissan. Mitsubishi owns a minority of China Motor Corporation (CMC). Ford Lioho is minority-owned by Ford. Sanyang Motor makes Hyundai vehicles as Hyundai partner.



Bicycles

Taiwan is the biggest exporter of bikes to Europe – around 40% of all bicycles imported into Europe with the Netherlands, Germany and the UK as major destinations. More bikes sold in Europe contain Taiwan-made components though they may be marketed under a local brand with assembly in Europe.

The US is the top destination for Taiwan-made bicycles. American consumers, together with Dutch, German and British, account for two-thirds of bikes annually exported from Taiwan.

Taiwan's bicycle industry is clustered around Taichung in the centre of the island, with the world's biggest manufacturer, Giant, to its north and the second biggest, Merida, to the south. In between, hundreds of factories employ thousands of migrant workers especially from Vietnam, Thailand and The Philippines, who produce components (frames, brakes, chains, gears, lights, saddles, tyres, etc.). The world's largest manufacturer of bike tyres, Maxxis, has factories here too.

Bikes and parts are exported worldwide from Taichung's factories. Specialized and Centurion buy from Merida; Giant supplies Trek, Scott, and previously REI; Bianchi, Canyon and Pinarello source from Fritz Jou among others; Cannondale and Cervelo from Kenstone Metal. Cycleurope – behind brands like Crescent, Kildemoes, Monark and Puch – also sources from Taiwanese firms. Merida and Giant bikes are sold under their own names in tens of thousands of stores worldwide, too.



Electronics

The electronics industry is Taiwan's biggest and employs more than a million people. Around 10 % are migrant employees, especially of Filipino nationality but also Vietnamese and Thai. Taiwanese manufacturers are key to global electronics supply chains, many with significant manufacturing subsidiaries abroad such as in China.

Major Taiwanese companies include Taiwan Semiconductor Manufacturing Company (TSCM), Foxconn, Pegatron, Quanta Computer, Wistron, ASUStek, Compal Electronics, several of which are among the world's biggest contract manufacturers and comprise a major share of the global market.

Among Taiwanese manufacturing industries, electronics has probably received the most human rights and labor rights attention by civil society groups.

Major Taiwanese electronics manufacturers including ASUStek, Pegatron and Wistron publicly commit to no-fee recruitment policies due to debt bondage risks, though my and others' cases demonstrate that policies are not always translated into practice.



Industry: Electronics, car electronics.

Facilities investigated: Two factories in Luzhou district, Taoyuan.

Buyers identified: Bosch, Continental, General Motors, Hella, Magna, Visteon.

Investors identified: BlackRock, Vanguard, SSGA, Norge's Bank Investment Management.

Migrant workforce: Around 900. Including 550+ Thai, 250+ Vietnamese, 40+ Filipino.

Interviewees: 10+ Vietnamese women; few Thai and Filipino.

Manufacturer:

Chin Poon Industrial (CPI)

Issues identified: Debt bondage risks due to recruitment fees and deposits to home-country recruiters (Vietnamese paid up to \$6,500, Thai up to \$4,100); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); intimidation and threats; discipline by fines; restricted movement under the Covid-19 pandemic.

Issues remedied: Debt bondage; zero-fee policy implemented in December 2022; partial, flatrate, reimbursement of current employees' recruitment fees in two tranches in December 2022 and March 2023 (Vietnamese received \$2,100; Thai and Filipino \$1,250); deposits returned by Vietnamese recruiters to workers by November 2023; partial, flat-rate, reimbursement of further fees in December 2023 to 100+ workers, whom recruiters charged fees for more than one contractual term (Vietnamese received \$2,100; Thai and Filipino \$1,250).

Company responsiveness: Transparent and continuous communication with CPI; all identified buyers committed to look into issues following the investigation except Magna and Visteon. Despite years of imports, none of the buyers said they had previously checked for debt bondage risks due to high recruitment fees.

I was surprised.
I never imagined
getting my money
back, although it
is far from my
total fees.

Vietnamese employee after reimbursement took place, spring 2023.

Timeline

2022, Q1

Worker interviews begun

2022, Q2

Company engagement begun, first **media piece** 2022, Q4

Partial recruitment fee reimbursement, first tranch 2023, Q1

Partial recruitment fee reimbursement, second tranch 2023, Q1

Second and third **media piece** 2023, Q2

Expanding minimal reimbursements to former employees

2023, Q3

Fourth media piece

2023, Q4

Partial recruitment fee reimbursement, new tranch









Industry: Plastics and synthetic fibers.

Facilities investigated: Two factories in Pingzhen and Guanyin districts, Taoyuan.

Buyers identified: Continental, Dupont, Dutch State Mines (DSM), Niagara Bottling, Walmart.

Investors identified: BlackRock, Vanguard, SSGA, Norge's Bank Investment Management.

Migrant workforce: Around 400. Over 80% Vietnamese, over 10% Thai.

Interviewees: 20+ Vietnamese men.

Manufacturer:

Shinkong Synthetic Fibers Corporation (SSFC)

Issues identified: Debt bondage risks due to recruitment fees and deposits to Vietnamese recruiters (up to \$6,500); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); deceptive recruitment; retention of identity documents; intimidation and threats; discipline by fines; restricted movement during Covid-19 pandemic.

Issues remedied: Debt bondage; retention of identity documents; restricted movement; discipline by fines; zero-fee policy implemented in December 2022; reimbursement of current employees' recruitment

fees in April 2023 (amount individually calculated based on legal fees paid to recruiters in home countries, i.e. no reimbursement of illegally charged fees); workers who paid recruitment fees for more than one contractual term reimbursed for each contract.

Company responsiveness: Transparent and continuous communication with SSFC; all identified buyers committed to look into issues following the investigation. Despite years of imports, none of the buyers said they had previously checked for debt bondage risks due to high recruitment fees.

We feel caged.
We haven't been
allowed out at
all the past two
months. And we
weren't allowed out
at all for months in
mid-2021.

Vietnamese employee (May 2022).

Timeline

2022, Q1 Worker

Worker interviews begun



2022, Q2

Company engagement begun, first **media piece**



2022, Q3

US Tariff Act petition, second **media piece**



2022. Q4

2023, Q1

Third and fourth **media piece**





Recruitment fee reimbursements





Industry: Electronics.

Facilities investigated: One.

Buyers identified: Flex, Wistron, Pegatron, HughesNet (subsidiary of Echostar).

Migrant workforce: 25-30 Vietnamese.

Interviewees: 5 or less Vietnamese.

Manufacturer:

U. D. Electronic Corp.

Issues identified: Debt bondage risks due to recruitment fees to Vietnamese recruiters (over \$6,000); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); retention of identity documents.

Issues remedied: Debt bondage; reimbursements to current and recently fired Vietnamese workers in late 2023 (laid-offs received \$5,000-5,300).

Company responsiveness: Following buyer engagement, U. D. Electronic Corp reimbursed workers.

l al

I almost just arrived, and now they fired us. I haven't even repaid my debt. It is inconsistent with reality to hire us on three-year contracts and fire us shortly after.

Fired Vietnamese worker (September 2023)

Timeline

2023, Q3
Worker interviews

2023, Q3

Company engagement begun

U3 ny t beaun re

2023, Q4 Media piece, reimbursements







Industry: Metal parts, car parts.

Facilities investigated: Two factories in Zhongli and Guanyin districts, Taoyuan.

Buyers identified: SpaceX, Ford, General Motors, Toyota, Honda, Nissan, Mitsubishi, Kuozui Motors, Sanyang Motor (manufacturer of Hyundai).

Migrant workforce: 200-300 estimatedly. Including Vietnamese, Filipino, Indonesian, Thai.

Interviewees: 10+ Vietnamese, Filipino and Indonesian men.

Manufacturer:

Lioho Machine Works (LMW)

Issues identified: Debt bondage risks due to recruitment fees to home-country recruiters (Vietnamese paid over \$5,000, Filipino and Indonesian \$1,300-4,000); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); intimidation and threats; discipline by fines; retention of identity documents when violating dorm rules.

Issues remedied: None or some; no reimbursements as of early 2025.

Company responsiveness: Ford and GM committing and communicative; Toyota, Honda, Nissan, Mitsubishi, Sanyang, Kuozui provided uncommitting replies; SpaceX and LMW unresponsive.



Back home, I paid recruiters for this job with borrowed money. I am still paying off my debt. On top of that, labor brokers here in Taiwan charge me monthly fees. Everybody pays.

Migrant employee (mid-2023)



If we make mistakes of any kind, they call our labor broker and summon us to the office to account for our mistake in front of managers and the broker.

Migrant employee (mid-2023)

Timelin

2023, Q2 Worker interviews



2023, Q3 Company

Company engagement begun



2023, Q4

First media piece



2024, Q1

Second media piece



2024, Q2

US Tariff Act petition, third **media piece**

2024, Q3

Feefocused audit



2024, Q4







Industry: Cars.

Facilities investigated: Two factories in Zhongli and Guanyin districts, Taoyuan.

Owners identified: Toyota (65%), Hotai Motor (30%), Hino Motors (5%).

Investors of Toyota identified: Nissay Asset Management, JP Morgan, Vanguard, Denso, Mitsubishi UFJ, BlackRock, Norge's Bank Investment Management, Dimensional.

Migrant workforce: Around 150 Vietnamese.

Interviewees: 5 or less Vietnamese.

Manufacturer: Kuozui Motors (Toyota)

Issues identified: Debt bondage risks due to recruitment fees to Vietnamese recruiters (around \$4,500); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract).

Issues remedied: None known.

Company responsiveness: Toyota and Kuozui Motors communicative, uninformative, uncommitting replies; migrant employees said that Kuozui Motors told them not to discuss recruitment issues with anyone outside the company.



Suppliers should not exploit employees with high recruitment fees and other costs that are considered unreasonable by international norms.

Toyota's Supplier Guidelines. Suppliers should follow international norms



We have confirmed that there are no unreasonable fees being imposed on migrant workers at Kuozui Motors, in alignment with local laws and societal norms.

Toyota (April 2024). Subsidiaries/affiliates should not follow international norms.

Timelin

2023, Q4 Worker interviews

begun

2023, Q4

Company engagement begun



2023, Q4

First media piece



2024, Q1

Second

media

piece

2024, Q2

Third media piece





Industry: Glass containers, bottles.

Facilities investigated: One factory in Hsinchu, Taiwan.

Buyers identified: L'Oreal, Veritiv, Evergreen Resources (subsidiary of Pioneer), Berlin Packaging.

Migrant workforce: Vietnamese.

Interviewees: 5 or less Vietnamese.

Manufacturer: Hwa Hsia Glass

Issues identified: Debt bondage risks due to recruitment fees to Vietnamese recruiters (up to \$6,500); monthly service fees to Taiwanese labor brokers (two month's base wage per three-year contract); retention of workers' passports; excessive and unpaid overtime; withholding of wages; intimidation and threats; discipline by fines; abusive working and living conditions; restricted movement during Covid-19 pandemic.

Issues remedied: Passports returned to workers; withholding of wages.

Company responsiveness: Hwa
Hsia Glass denied that overtime was
unpaid, did not commit to addressing debt bondage risks and more;
L'Oreal immediately cut ties with
its sub-supplier but promised to
help affected workers; other buyers
unresponsive.

We will continue to monitor the findings from these audits and ensuring that remediation action plan and potential mitigation measures are applied for the potentially affected workers.

L'Oreal (January 2023).

Timeline

2022, Q2 Worker outreach



2022, Q4 Company engagement



2023, Q1

First media piece



2024, Q4 Second media piece



Industry: Bicycles.

Facilities investigated: Factories and dormitories in Dajian district, Taichung.

Buyers identified: Scott, Trek, Team Jayco AlUla, YouBike (bike rental partnership with Taiwanese city authorities). REI until mid-2024.

Investors identified: BlackRock, Vanguard, Dimensional, JP Morgan, BNP Paribas, HSBC, Schroder, Royal Bank of Canada, Norge's Bank Investment Management, Chunghwa Post (Taiwan government-owned). Federated Hermes until mid-2024. Sweden's Pension Fund AP2 until mid-late 2024.

Migrant workforce: 652 Vietnamese and

Thai workers.

Interviewees: 20+ Vietnamese and

Thai men.

Manufacturer: Giant

Issues identified: Debt bondage risks due to recruitment fees and deposits to home-country recruiters (Vietnamese up to \$6,700 including deposits, Thai up to \$3,200); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); withholding of wages; abusive living conditions; intimidation and threats.

Issues remedied: Withholding of wages; dorms being renovated; zero-fee policy to be implemented in January 2025.

Company responsiveness: Giant communicative and partially committing, rejects fee reimbursements hence debt bondage risk still real; Scott responsive and committing; REI responsive, uncommitting replies; Trek and YouBike unresponsive; majority of investors communicative.

It is very expensive. We get no service, but we cannot avoid paying.

Vietnamese employee on the monthly broker fees (spring 2024)

Imelin

2024, Q1

Worker interviews begun

2024, Q2

Company and government engagement begun, first **media piece**

2024, Q3

US Tariff Act petition, second **media piece**, third **media coverage** 2024, Q3

Workers informed about access to withheld wages, dorm renovation begun

2025, Q1

Fourth and fifth media pieces

2025, Q1

Zero-fee policy to be implemented







Industry: Bicycles.

Facilities investigated: Manufacturing and accommodations in Changhua county.

Buyers identified: Specialized, Centurion.

Investors identified: Cathay, Schroder, Vanguard, BlackRock, Norge's Bank Investment Management, Dimensional.

Migrant workforce: 200-300 Thai according to workers.

Interviewees: 5+ Thai men

Manufacturer: Merida Bikes

Issues identified: Debt bondage risks due to recruitment fees to Thai recruiters (up to \$3,500); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); contract renewal fees; retention of workers' passports; deceptive recruitment; intimidation and threats; discipline by fines.

Issues remedied: None known.

Company responsiveness: Merida, Specialized and Centurion unresponsive.

Merida has yet to adopt the Responsible Business Alliance Code of Conduct [that includes practising no-fee recruitment and reimbursing employees who paid fees] and relevant human rights policies, hence [it] has not implemented the Human Rights Due Diligence.

Merida's President said on its website (2024).

imeline

2024, Q3 Worker

Worker interviews begun



2024, Q4

Company engagement begun



2025, Q1

US Tariff Act petition



2025, Q1

First media piece and second media piece







Industry: Bicycle and car tires.

Facilities investigated: Manufacturing and accommodations in Changhua county.

Buyers identified: Maxxis International.

Investors identified: Cathay, Vanguard, BlackRock, Dimensional, Norge's Bank Investment Management, Sweden's Pension Fund AP2.

Migrant workforce: Around 700, from Vietnam, Thailand and Indonesia.

Interviewees: 5 or less Vietnamese.

Manufacturer: Maxxis

Issues identified: Debt bondage risks due to recruitment fees and deposits to home-country recruiters (Vietnamese up to \$6,000); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); intimidation and threats.

Issues remedied: None known.

Company responsiveness: ZF communicative; Iron Force unresponsive.

Of course I paid to work.
New workers pay. Old
workers paid. I paid
recruiters \$5,000 in fees
and another \$1,000 as
anti-escape deposit.

Vietnamese employee (2024)

imeline

2024, Q4 Worker interviews begun



2024, Q4 Company

Company engagement begun



2025, Q1 First media piece and second media piece





Industry: Car parts.

Facilities investigated: One factory in

Nantou county.

Buyers identified: ZF.

Investors identified: Vanguard,

Dimensional, Norges Bank Investment

Management.

Migrant workforce: Filipino.

Interviewees: 5 or less Filipino.

Manufacturer: Iron Force Industrial

Issues identified: Debt bondage risks due to recruitment fees to recruiters in The Philippines (up to \$1,700); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract).

Issues remedied: None known.

Company responsiveness: ZF communicative; Iron Force unresponsive.

The allegations you raised have been internally recorded as a report, and we will investigate them thoroughly. (...) Once the internal review is complete, we will report the findings in our public reports. (...) We are aware of the risks associated with forced labor, including debt bondage, and take them very seriously.

ZF (2024)

imeline

2024, Q1 Worker

Worker interviews begun

2024, Q4 Company engagement



Cases

Facts ↓





Industry: Medical optics, contact lenses, electronics.

Facilities investigated: Manufacturing and accommodations in Taoyuan.

Owners identified: Pegatron.

Investors of Pegatron identified:

ASUStek, Vanguard, BlackRock, Morgan Stanley, Dimensional, Norges Bank Investment Management.

Migrant workforce: Around 500 Vietnamese and Filipino.

Interviewees: 5+ Vietnamese and Filipino.

Manufacturer: Pegavision

Issues identified: Debt bondage risks due to recruitment fees to home-country recruiters (Vietnamese up to \$6,000); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); intimidation and threats; discipline by fines.

Issues remedied: None known.

Company responsiveness: Pegavision and Pegatron unresponsive.

Pegatron complies with the requirements of the RBA Code of Conduct.

Pegatron's Sustainability Report (2023).

Pegatron's membership category of RBA requires companies to ensure that workers do not pay recruitment fees and that they are reimbursed, if fees have been paid.

imeline

2024, Q4 Worker interviews



2024, Q4

Company engagement begun



Cases

Facts ↓



Industry: Electronics.

Facilities investigated: One factory.

Buyers identified: Motorola Solutions.

Migrant workforce: Around 60

Vietnamese.

Interviewees: 5 or less Vietnamese.

Manufacturer: Topview

Issues identified: Debt bondage risks due to recruitment fees and deposits to home-country recruiters (Vietnamese up to \$5,700); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); intimidation and threats.

Issues remedied: None known.

Company responsiveness:

Topview unresponsive; Motorola communicative.

Suppliers must (...) prohibit charging any recruitment f ees to workers.

Motorola's supplier code of conduct.

Motorola's membership category of RBA requires it to ensure that workers do not pay recruitment fees and that they are reimbursed, if fees have been paid.

imeline

2024, Q4 Worker interviews begun

2024, Q4

Company engagement begun



Cases

Facts ↓



Industry: Electronics.

Facilities investigated: One factory in Xishie district, New Taipei City.

Buyers identified: Axiomtek USA, Axis

Technologies, Alltronix.

Investors identified: Advantech, Weide,

Dimensional.

Migrant workforce: 50-60 Vietnamese.

Interviewees: 5 or less Vietnamese.

Manufacturer: Axiomtek

Issues identified: Debt bondage risks due to recruitment fees to Vietnamese recruiters (up to \$6,500); deceptive recruitment; intimidation and threats; abusive living conditions.

Issues remedied: None known.

Company responsiveness: Axiomtek unresponsive.

Life is stressful. My family borrowed a lot of money to pay for the job. When we make mistakes, the factory punishes us and gives no overtime work. How can we make repayments without overtime salary?

Vietnamese employee (2025).

Timeline

2024, Q4
Worker
interviews

begun

2024, Q4 Company engagement begun



Manufacturer JCI-Hitachi

Issues identified: Debt bondage risks due to recruitment fees to home-country recruiters (Vietnamese up to \$5,500); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract).

Issues remedied: Debt bondage; recruitment fees; monthly service fees; JCI-Hitachi reimbursed recruitment fees and monthly broker fees to all current migrant workers; several former workers were reimbursed too; Vietnamese workers reported reimbursements between \$8,300 and \$12,000.

Company responsiveness: Johnson Controls and Hitachi reacted immediately.

Facts ↓



Owners identified: Johnson Controls (60%) and

Hitachi (40%).

Migrant workforce: 20-30 Vietnamese and 300-

350 Filipino.

Interviewees: 5 Vietnamese.

Manufacturer-

Hantic Precision Technology

Issues identified: Debt bondage risks due to recruitment fees and deposits to home-country recruiters (Vietnamese up to \$5,500); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract).

Issues remedied: Monthly service fees; zero-fee policy implemented in September 2024; Hantic committed to reimburse workers their recruitment fees and related costs in mid-2025

Company responsiveness: Hantic, Meiko Electronics, Bosch and Denso Group communicative and committed; ASE, Continental and Panasonic unresponsive.

Facts **↓**

Industry: Electronics.

Buyers identified: ASE, Bosch, Meiko Electronics,

Continental, Denso Group, Panasonic. Migrant workforce: 68 Vietnamese.

Interviewees: 2 Vietnamese.

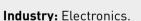
Manufacturer Gianta

Issues identified: Debt bondage risks due to recruitment fees to home-country recruiters (up to \$6,600); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); passport retention: restricted freedom of movement: abusive living conditions; withholding of wages; discipline by fines.

Issues remedied: Restricted movement; discipline by fines; passport retention; withholding of wages; dormitory to be renovated within a year; zero-fee policy to be implemented.

Company responsiveness: Gianta, Accton Technology and Amazon communicative. Broadcom. Promise Technology, Sony and Festool unresponsive.

Facts ↓



Buyers identified: Amazon, Accton Technology, Broadcom, Promise Technologies, Sony, Festool.

Migrant workforce: 50-60 Vietnamese.

Interviewees: 12 Vietnamese.

2024. Q2 Worker

interviews begun

2024. Q3 Company

Transparentem engagement report begun published

2025. Q1

2024. Q1

Worker interviews begun

2024. Q2

Company engagement begun

2025. Q1

Transparentem report published

2024, Q2

Worker interviews begun

2024. Q3

Company engagement begun

2025. Q1 Transparentem

report published









Companies: Samsung C&T, RSEA Engineering (subsidiary of L&K Engineering), Taoyuan International Airport Corporation (Taiwan governmentowned).

Industry: Construction, airports.
Facilities investigated: Terminal 3,
Taoyan international airport.

Investors identified: BlackRock.

Vanguard, Dimensional, Norge's Bank Investment Management, Korea's

National Pension Fund, Veteran's Affairs

Council (Taiwanese government agency).

Migrant workforce: Around 1,500 Thai and Vietnamese. Also 500+ runaways. Interviewees: 10+ Vietnamese men.

Taiwan's international airport in Taoyuan is being expanded due to a \$3 billion government budget for a new terminal. The airport project is the millennium's largest single investment by Taiwan's government. Since construction kicked off in 2021, several thousand workers have been imported from Vietnam and Thailand to expand the airport. Over 500 migrants have fled the site, becoming undocumented workers.

Issues identified: Debt bondage due to recruitment fees to home-country recruiters (up to \$5,700); monthly service fees to Taiwanese labor brokers (two months' base wage per three-year contract); deceptive recruitment; intimidation and threats; discipline by fines.

Issues remedied: None known.

Company responsiveness: Samsung C&T little communicative, uncommitted; RSEA and L&K Engineering unresponsive; majority of investors communicative. No one explained why the migrants' recruitment fees didn't make it into the \$3 billion budget.

I My family didn't have a single dong. I borrowed everything from the bank and others.

Vietnamese worker, (spring 2024) paying over \$5,000 for his job, equivalent to 2.5 years of Vietnam's minimum wage.

Timeline

2024, Q1

Worker interviews begun

2024, Q2

Company and government engagement begun

2024, Q3
First media piece, second media coverage

