

INTERNATIONAL CORPORATE BAD ACTORS IN HONG KONG, 2019 TO 2022

Table 01. International businesses that have violated the UN Guiding Principles of Business and Human Rights (UNGPs) in Hong Kong, as of October 18, 2022

The entries are listed in roughly chronological order, from most recent to oldest.

(Sources listed in Appendix I)

Business / corporate headquarters	Action	Violation of principle
Brookfield Asset Management Canada	Vice-chair Mark Carney will participate in the Hong Kong government finance summit.	
JPMorgan Chase USA	President and COO Daniel Pinto will participate in the Hong Kong government finance summit.	
BlackRock USA	President Rob Kapito will participate in the Hong Kong government finance summit.	The summit is used by the Hong Kong government to legitimize its authoritarian regime and cover up its systematic human rights abuses. Participation constitutes support for the regime and collusion with it.
Citigroup USA	CEO Jane Fraser will participate in the Hong Kong government finance summit.	
Amundi France	CEO Valérie Baudson will participate in the Hong Kong government finance summit.	
KKR USA	Co-CEO Joseph Bae will participate in the Hong Kong government finance summit.	

Business / corporate headquarters	Action	Violation of principle
Goldman Sachs USA	Chair and CEO David Solomon will participate in the Hong Kong government finance summit.	
UBS Switzerland	Chair Colm Kelleher will participate in the Hong Kong government finance summit.	
Blackstone USA	President and COO Jonathan Gray will participate in the Hong Kong government finance summit.	
Morgan Stanley USA	Chair and CEO James Gorman will participate in the Hong Kong government finance summit.	
Carlyle USA	Co-chair William Conway Jr will participate in day 3 of the Hong Kong government finance summit.	The summit is used by the Hong Kong government to legitimize its authoritarian regime and cover up its systematic human rights abuses. Participation constitutes support for the regime and collusion with it.
Man Group UK	CEO Luke Ellis will participate in day 3 of the Hong Kong government finance summit.	
Apollo Asset Management USA	Co-president Jim Zelter will participate in day 3 of the Hong Kong government finance summit.	
BNY Mellon Investment Management USA	CEO Hanneke Smits will participate in day 3 of the Hong Kong government finance summit.	
State Street Global Advisors USA	President and CEO Cyrus Taraporevala will participate in day 3 of the Hong Kong government finance summit.	

Business / corporate headquarters	Action	Violation of principle
Stripe Ireland and US	Terminated services to three Hong Kong protesters crowdfunding to pay legal costs for a protest-related court case on grounds that they were “too high-risk” though they were acting lawfully and within their rights.	Stripe appears to have terminated services because it feared government opprobrium or may have even been warned by the government against providing services to dissidents; thus, its action appears politically motivated and has the effect of furthering the regime’s repression.
PayPal USA	Terminated the account of pro-democracy political party League of Social Democrats due to “excessive risks,” even though LSD is registered in Hong Kong as a legal entity in good standing.	LSD is the only pro-democracy political party still active in Hong Kong, and its members have been targeted by the government with repressive actions of various kinds such as arrests, imprisonments, and incessant harassment. Thus, PayPal’s action appears politically motivated and has the effect of furthering the regime’s repression.
Mercedes-Benz* Germany	50 extra-large police vans with state-of-the-art crowd control equipment are reported to have been sold to the Hong Kong Police Force (HKPF). The first two were displayed publicly on June 19, 2022.	HKPF has been widely criticized by Hong Kong citizens and international human rights organizations for indiscriminate use of violence against protesters and its prominent role in enforcing the national security law. In 2019, the U.S. banned export licenses for certain crowd control equipment to HKPF, the UK suspended them, and the EU parliament called for such export controls in the EU.

*Mercedes-Benz has not publicly acknowledged the sale of police vans to HKPF, nor are there any notices of sales of police vans by Mercedes-Benz to HKPF in publicly available Hong Kong government procurement records. There are two reports from two different Hong Kong news organizations on the arrival and first public display of two police vans said to be made by Mercedes-Benz and prominently displaying the well-known Mercedes-Benz logo on the front of both. The same reports also mention that these two are part of a group of 50 which has been sold, but there are few other details.

Business / corporate headquarters	Action	Violation of principle
<p>Mayer Brown USA</p>	<p>Assisted its client, University of Hong Kong, in efforts to remove the Pillar of Shame statue from campus. Under pressure, eventually said it would cease doing so.</p>	<p>The Pillar of Shame was one of several monuments on Hong Kong university campuses commemorating the Tiananmen Massacre. Its removal was part of coordinated efforts by universities to remove all signs of this history in order, supposedly, to avoid the risk of violating the national security law.</p>
<p>HSBC UK</p>	<ol style="list-style-type: none"> 1. CEO of HSBC Asia Pacific Peter Wong expressed support for the national security law. 2. HSBC has frozen the accounts of protester aid group Spark Alliance, pro-democracy Good Neighbour North District Church, and former pro-democracy Legislative Council member Ted Hui. 3. CE Noel Quinn will participate in the Hong Kong government finance summit. 	<ol style="list-style-type: none"> 1. The UN Human Rights Committee has advised repeal of the national security law because it is intrinsically rights-abusing. 2. HSBC froze the accounts though the account holders in question were not convicted of any crime in relation to the accounts. 3. The summit is used by the Hong Kong government to legitimize its authoritarian regime and cover up its systematic human rights abuses. Participation constitutes support for the regime and collusion with it.
<p>Standard Chartered UK</p>	<ol style="list-style-type: none"> 1. Issued statement in June 2020 in support of the national security law while it was being drafted and before anyone outside of the CCP, including the bank, had seen a draft. 2. CE Bill Winters will participate in the Hong Kong government finance summit. 	<ol style="list-style-type: none"> 1. The UN Human Rights Committee has advised repeal of the national security law because it is intrinsically rights-abusing. 2. The summit is used by the Hong Kong government to legitimize its authoritarian regime and cover up its systematic human rights abuses. Participation constitutes support for the regime and collusion with it.

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Deloitte USA	Published ads in CCP-owned newspapers Ta Kung Pao & Wen Wei Po congratulating John Lee on becoming Chief Executive.	John Lee is sanctioned by the U.S. for his role in stripping HK of autonomy and political freedoms. As Secretary for Security, he led the crackdown on protests, political opposition and civil society. He was appointed to CE by the CCP without competition at a time when elections are not free and fair.
Ernst & Young USA	Published ads in CCP-owned newspapers Ta Kung Pao & Wen Wei Po congratulating John Lee on becoming Chief Executive.	John Lee is sanctioned by the U.S. for his role in stripping HK of autonomy and political freedoms. As Secretary for Security, he led the crackdown on protests, political opposition and civil society. He was appointed to CE by the CCP without competition at a time when elections are not free and fair.
KPMG USA	Published ads in CCP-owned newspapers Ta Kung Pao & Wen Wei Po congratulating John Lee on becoming Chief Executive.	John Lee is sanctioned by the U.S. for his role in stripping HK of autonomy and political freedoms. As Secretary for Security, he led the crackdown on protests, political opposition and civil society. He was appointed to CE by the CCP without competition at a time when elections are not free and fair.
PwC USA	Published ads in CCP-owned newspapers Ta Kung Pao & Wen Wei Po congratulating John Lee on becoming Chief Executive.	John Lee is sanctioned by the U.S. for his role in stripping HK of autonomy and political freedoms. As Secretary for Security, he led the crackdown on protests, political opposition and civil society. He was appointed to CE by the CCP without competition at a time when elections are not free and fair.
Davis Polk & Wardwell USA	Asia chairperson Martin Rogers, is an enthusiastic supporter of the national security law and has attended Hong Kong government-organized events promoting it. He decided not to attend one such event after criticism.	The UN Human Rights Committee has advised repeal of the national security law because it is intrinsically rights-abusing.

Business / corporate headquarters	Action	Violation of principle
<p>American Chamber of Commerce Hong Kong</p>	<p>Launched a series of events to promote Hong Kong, including a series of events called Onward Hong Kong, for which Meta is listed as a “presenting sponsor,” and AllianceBernstein, Citibank, Colgate, Google, Otis, Pfizer and Uber as “corporate champions.” Does not advertise participants or speakers at the events.</p>	<p>Its campaign echoes and complements a similar campaign by the Hong Kong government, which is widely regarded as propaganda intended to whitewash the regime’s crackdown and rights abuses and runs counter to many recent statements by the U.S. government condemning same crackdown and rights abuses. Instead of encouraging U.S. companies to develop Hong Kong-specific policies to guard against complicity in rights abuses, it appears to be encouraging companies to align with the government.</p>
<p>Wix Israel</p>	<p>Took down the website of Hong Kong Charter 2021 after receiving a letter from HKPF demanding the site be removed as it is “likely to constitute offences endangering national security.” When the matter went public, Wix apologized for the “error” and the website went back up.</p>	<p>This was the first known example of Hong Kong police invoking the “national security law” to threaten a company and also the first example of the police attempting to apply the law extraterritorially.</p>
<p>Piexon Switzerland</p>	<p>Accused of selling new pepper spray gun JPX6 to HKPF. Denies the allegation. The gun is manufactured by Piexon but was possibly acquired through China without Piexon’s authorization.</p>	<p>HKPF has been widely criticized by Hong Kong citizens and international human rights organizations for indiscriminate use of violence against protesters and its prominent role in enforcing the national security law. In 2019, the U.S. banned export licenses for such equipment to HKPF, the UK suspended them, and the EU parliament called for such export controls in the EU.</p>

Business / corporate headquarters	Action	Violation of principle
<p>Cellebrite Israel</p>	<p>Sold technology to HKPF which was used to hack arrested protesters' mobile phones. Announced in Oct 2020 it stopped due to "changes in U.S. regulations."</p>	
<p>NonLethal Technologies USA</p>	<p>Sold tear gas to HKPF. Spent tear gas canisters with company info were found at protest sites. After passage of PROTECT Hong Kong Act in November 2019, it became no longer possible to get an export license for such sales, but that prohibition expired in late 2020.</p>	<p>HKPF has been widely criticized by Hong Kong citizens and international human rights organizations for indiscriminate use of violence against protesters and its prominent role in enforcing the national security law. In 2019, the U.S. banned export licenses for such equipment to HKPF, the UK suspended them, and the EU parliament called for such export controls in the EU.</p>

APPENDIX I: Sources for Entries in the Table 01

- For **Brookfield Asset Management, JPMorgan Chase, BlackRock, Citigroup, Amundi, KKR, Goldman Sachs, UBS, Blackstone, Morgan Stanley, HSBC, and Standard Chartered**, see: Hong Kong Monetary Authority schedule of Global Financial Leaders' Investment Summit, <https://www.hkma.gov.hk/media/eng/doc/key-information/insight/inSight-on-Investment-Summit-Summit-Programme.pdf>.
- For **Carlyle, Man Group, Apollo Asset Management, BNY Mellon Investment Management, and State Street Global Advisors**, see “Carlyle, Apollo, BNY Mellon and State Street executives to take part in HKMA seminar at Hong Kong finance summit,” *South China Morning Post*, October 18, 2022, <https://www.scmp.com/business/article/3196418/carlyle-apollo-bny-mellon-and-state-street-executives-take-part-hkma-seminar-hong-kong-finance>.
- For **HSBC CEO's** support for national security law, see: “HSBC's Top Asia Banker Backs China's Hong Kong Security Law,” *Bloomberg*, June 3, 2020, <https://www.bloomberg.com/news/articles/2020-06-03/hsbc-s-top-asia-executive-backs-china-s-hong-kong-security-law?leadSource=verify%20wall>.
- For **HSBC's** freezing of the accounts of those persecuted by the Hong Kong government, see: “Hong Kong Police Freeze \$9M in Protest Fund,” *VOA*, December 19, 2020, <https://www.voanews.com/a/east-asia-pacific-hong-kong-police-freeze-9m-protest-fund/6181330.html>; “Explainer: HSBC, Spark Alliance, and the law behind the latest fury in Hong Kong protests,” *South China Morning Post*, January 8, 2020, <https://www.yahoo.com/video/explainer-hsbc-spark-alliance-law-093000268.html>; “Hong Kong bank account freezes rekindle asset safety fears,” *Reuters*, December 8, 2020, <https://www.reuters.com/article/hongkong-security-banks-idUKKBN28I1ZK>.
- For **Standard Chartered's** support for national security law, see: “StanChart says it supports national security law for Hong Kong,” *Reuters*, June 3, 2020, <https://www.reuters.com/article/hongkong-protests-stanchart/stanchart-says-it-supports-national-security-law-for-hong-kong-idUSL8N2DG5MS>.
- For **Stripe**, see: “指遭警毆打索償敗訴 反東北發展示威者眾籌訟費遭禁,” *InMedia*, October 14, 2022, <https://tinyurl.com/yempu2ae>
- For **PayPal**, see: “PayPal halts payments to Hong Kong pro-democracy group, citing unspecified ‘excessive risks’,” *Hong Kong Free Press*, October 12, 2022, <https://hongkongfp.com/2022/10/12/paypal-hk-halts-payments-to-hong-kong-pro-democracy-group-citing-unspecified-excessive-risks/>.
- For **Mercedes Benz**, see: “警隊戰術巴士首曝光 設360度監視鏡頭 6隻小窗口可發射催淚彈,” *HK01*, June 19, 2022, <https://tinyurl.com/yckrban6> and “Police get two new tactical vehicles,” *The Standard*, January 16, 2022, <https://www.thestandard.com.hk/breaking-news/section/4/186008/Police-get-two-new-tactical-coaches>.
- For **Mayer Brown**, see: “U.S. law firm Mayer Brown to cease work for University of Hong Kong in dispute over Tiananmen memorial's removal,” *Washington Post*, October 15, 2021, <https://www.washingtonpost.com/world/2021/10/15/mayer-brown-hku/>.
- For **Deloitte, Ernst & Young, KPMG and PwC**, see: “KPMG, Deloitte, PwC among western firms congratulating Hong Kong's new leader,” *AFP*, May 11, 2022.

- For **Davis Polk & Wardwell**, see: “Martin Rogers of U.S. law firm Davis Polk withdraws from Hong Kong national security law forum following criticism,” *Hong Kong Free Press*, May 23, 2022.
- For **American Chamber of Commerce in Hong Kong, Meta, AllianceBernstein, Citibank, Colgate, Google, Otis, Pfizer and Uber**, see: “AmCham promotes HK amid rising US-China tensions,” *Asia Times*, August 18, 2022, <https://asiatimes.com/2022/08/amcham-promotes-hk-amid-rising-us-china-tensions/> and “Onward Hong Kong: The Next 25 Years: Resilience, Rebound, Renewal: Writing a New Chapter for Hong Kong,” American Chamber of Commerce in Hong Kong, <https://amchamhk.glueup.com/event/onward-hong-kong-60393/>.
- For **Wix**, see: “Hong Kong democracy site pulled ‘by mistake’,” *Hong Kong Free Press*, June 4, 2021, <https://hongkongfp.com/2021/06/04/hong-kong-democracy-site-pulled-by-mistake/>.
- For **Piexon**, see: “Explainer: Piexon JPX6—the new hi-tech pepper spray tool for Hong Kong riot police,” *Hong Kong Free Press*, June 6, 2020, <https://hongkongfp.com/2020/06/06/explainer-piexon-jpx6-the-new-hi-tech-pepper-spray-tool-for-hong-kong-riot-police/>.
- For **Cellebrite**, see: “Israeli Phone-hacking Firm Cellebrite Halts Hong Kong Deal with China,” *Haaretz*, Oct 8, 2020, <https://www.haaretz.com/israel-news/tech-news/2020-10-08/ty-article/.premium/israeli-phone-hacking-firm-cellebrite-halts-hong-kong-deal-with-china/0000017f-f51f-d044-adff-f7ffd8870000>.
- For **NonLethal Technologies**, see: “U.S. company supplying tear gas to Hong Kong police faces mounting criticism,” *Reuters*,

October 11, 2019, <https://www.reuters.com/article/us-hongkong-protests-usa-teargas/u-s-company-supplying-tear-gas-to-hong-kong-police-faces-mounting-criticism-idUSKBN1WQ2M1>.