IT DOES MATTER WHERE YOU STAY

UHRP

Chains in East Turkistan

By Peter Irwin, Henryk Szadziewski, and Ben Carrdus

About the Uyghur Human Rights Project

The Uyghur Human Rights Project (UHRP) promotes the rights of the Uyghur people through research-based advocacy. We publish reports and analysis in English and Chinese to defend Uyghurs' civil, political, social, cultural, and economic rights according to international human rights standards.

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I. Key Takeaways

- Five international hotel chains—Accor, Hilton, InterContinental (IHG), Marriott, and Wyndham—currently operate in the Uyghur Region amidst ongoing crimes against humanity and genocide.¹
- International hotel chains have significantly expanded their presence in the Uyghur Region, with at least 115 hotels operational as of April 2025. At least another 74 hotels are in various stages of planning or construction from Accor, Hilton, Hyatt, IHG, Marriott, Minor Hotels, and Wyndham. A total of 189 hotels from international chains are either open, or are planned to open, in the Uyghur Region.
- Three international hotel chains—Hilton, IHG, and Wyndham—are located in areas administered by the Xinjiang Production and Construction Corps (XPCC) (新疆生产建设兵团), an entity under targeted sanctions by the United States, Canada, the United Kingdom, and the European Union, for its grave and systematic human rights violations.
- Hilton, through a franchisee, built a Hampton by Hilton hotel on the site of a demolished mosque in Khotan, following an extensive government campaign that left more than 10,000 mosques destroyed throughout the region. Despite international scrutiny, including an inquiry from the US Congress in 2021, the hotel opened for visitors in 2024.
- Accor has been exposed to Uyghur forced labor in two ways: (1) through a franchisee's participation in a "labor transfer" program called the Hundred Project (百名工程); and (2) through its strategic partner in China, H World Group Limited (华住酒店集团), which has benefitted from "Xinjiang Aid" (对口援疆) programs, identified by experts as a high-risk indicator of Uyghur forced labor.
- Ownership structures and management partnerships between international hotel chains and Chinese companies link international chains to state-owned companies, creating ties that financially benefit and advance the interests of a government responsible for crimes against humanity.
- Hilton Hotels in the Uyghur Region host state propaganda events and promote tourism sites that erase a non-state version of Uyghur culture and history.
- International hotel chains' operations in the Uyghur Region may be in violation international standards, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and the International Labour Organization's Forced Labour Convention (C29) and Abolition of Forced Labour Convention (C105).²

¹ The full names of the listed hotels are: Accor S.A., Hilton Hotels & Resorts (owned by Hilton Worldwide Holdings Inc.), InterContinental Hotels Group (IHG), Marriott International Inc., and Wyndham Hotels & Resorts Inc. The toponyms "East Turkistan" and "Uyghur Region" are used in this report, which are preferred by Uyghurs in the diaspora over "Xinjiang" and the "Xinjiang Uyghur Autonomous Region," which are seen as offensive colonial terms. In cases where we cite particular publications or refer to government offices and apparatuses, we do use "Xinjiang Uyghur Autonomous Region" or related forms such as "the XUAR" or "Xinjiang."

² See Table 3.

II. Introduction: Operational Risks Amid Genocide

Searching for a hotel in Xinjiang? With 2 in Xinjiang, IHG Hotels & Resorts has the perfect hotel for your upcoming trip to Xinjiang. Our hotels are dedicated to providing exceptional service and a memorable stay for every guest. Whether you're seeking luxury, boutique, or budget-friendly accommodations in Xinjiang, we have a hotel brand that will exceed your expectations.

Discover the perfect IHG hotel in Xinjiang and create unforgettable memories during your visit. Book your stay with us today and let us make your trip exceptional.

- IHG Hotel and Resorts³

Dozens of hotels under Accor, Hilton, InterContinental (IHG), Marriott, and Wyndham brands can be found across the Uyghur region, 23 of which are reviewed in this report.⁴ These hotels, through ownership structures, management partnerships, or franchising agreements, benefit from a presence in the Uyghur Region.⁵ The presence alone of international hotel chains in a region undergoing crimes against humanity and genocide is morally indefensible. Promotional materials from these hotels ignore this context, implying that business can be conducted amid genocide.

The presence alone of international hotel chains in a region undergoing crimes against humanity and genocide is morally indefensible.

These hotels continue to operate and expand business in a region in which Uyghur families have been torn apart by internment, imprisonment, forced labor programs, and enforced disappearances.⁶ Uyghur communities in the Uyghur Region have been decimated by the destruction of their religion, language, and cultural heritage.⁷

Between 2017 and 2021, as arbitrary detention in the Uyghur Region reached its peak, Accor, Hilton, IHG, and Wyndham collectively opened 44 new hotels,⁸ embedding themselves further in a region where crimes against humanity were unfolding.⁹ The Uyghur Tribunal ruled in December 2021 that China was

³ "Xinjiang, Mainland China," InterContinental Hotels Group, accessed February 6, 2025, <u>https://archive.ph/xfV3Y</u>.

⁴ 166 additional hotels were located across the Uyghur Region at the end stages of research for this report, and were not included in a full analysis. These hotels can be found listed in Tables 2 and 4.

⁵ See Appendix II. (Table 5) for a list of local management companies operating hotels on the ground in the Uyghur Region. Hilton, IHG, Accor, Marriott, and Wyndham operate globally under both franchise and management models. Under the franchise model, local hotel owners operate a hotel under a brand's name, paying fees for brand use and marketing, but retaining control over operations. Under the hotel management agreement model, hotel brands or operators are responsible for managing hotels. In China, these hotel chains utilize a mix of the two models. See: "Hilton Begins Large-Scale Franchise Model in Asia Pacific," Hilton, September 28, 2021, https://stories. hilton.com/apac/releases/hilton-begins-large-asia-pacific-franchisemodel; "IHG Extends Franchise Model to Crowne Plaza and Holiday Inn Brands in China, " IHG, November 27, 2017, https://www.ihgplc.com/ en/news-and-media/news-releases/2017/ihg-extends-franchise-modelto-crowne-plaza-and-holiday-inn-brands-in-china; "Accor Celebrates the Opening of Its 700th Hotel in Greater China with Sofitel Shanghai North Bund," Accor, March 8, 2024, https://press.accor.com/accorcelebrates-the-opening-of-its-700th-hotel-in-greater-china-with-

sofitel-shanghai-north-bund-63996; "Record China Pace at Marriott," TopHotelNews, February 12, 2024, <u>https://tophotel.news/record-chinapace-at-marriott</u>; and "Wyndham Grows Direct Franchising Business in China, Signs Nearly 600 Hotels Over Five Years," Wyndham Hotels & Resorts, November 16, 2023, <u>https://corporate.wyndhamhotels.com/</u> <u>news-releases/wyndham-grows-direct-franchising-business-in-chinasigns-nearly-600-hotels-over-five-years</u>.

⁶ "2023 Country Reports on Human Rights Practices: China (Includes Hong Kong, Macau, and Tibet)," US Department of State, April 22, 2024, <u>www.state.gov/reports/2023-country-reports-on-human-rights-</u> <u>practices/china/</u>.

⁷ Ibid.

⁸ See hotel opening years in Chart 1.

⁹ "'Break Their Lineage, Break Their Roots': China's Crimes Against Humanity Targeting Uyghurs and Other Turkic Muslims," Human Rights Watch, April 19, 2021, <u>https://www.hrw.org/report/2021</u> /04/19/break-their-lineage-break-their-roots/chinas-crimes-againsthumanity-targeting. For prison sentences, see: Ben Carrdus and Peter Irwin, "UHRP Analysis Finds 1 in 26 Uyghurs Imprisoned in Region With World's Highest Prison Rate," Uyghur Human Rights Project (UHRP), December 6, 2023, <u>https://uhrp.org/report/uhrp-analysisfinds-1-in-26-uyghurs-imprisoned-in-region-with-worlds-highest-</u>

responsible for genocide, crimes against humanity, and torture, citing birth control and sterilisation as the primary reason for reaching its conclusion of genocide.¹⁰ Parliaments in the UK¹¹ and France¹² voted to recognize the Chinese government's treatment of Uyghurs as genocide and a crime against humanity in 2021 and 2022, respectively.¹³ The US government made a determination of genocide and crimes against humanity in 2021.¹⁴

The Office of the United Nations High Commissioner for Human Rights issued a report in August 2022 detailing widespread and systematic repression, including arbitrary detention, forced labor, and cultural erasure, finding that the Chinese government's treatment of Uyghurs and other Turkic peoples may constitute crimes against humanity.¹⁵

¹² "Condamnation des crimes perpétrés contre les Ouïghours: Discussion d'une proposition de résolution [Condemnation of Crimes Committed Against the Uyghurs: Discussion of a Proposed Resolution]," Assemblée Nationale [French National Assembly], ordinary session of 2021–2022, first session of Thursday, January 20, 2022, <u>https://www.assemblee-nationale.fr/dyn/15/comptes-</u> rendus/seance/session-ordinaire-de-2021-2022/premiere-seance-dujeudi-20-janvier-2022#2763412. The report warned that conditions remain in place for serious violations to continue and recur.

The US Holocaust Museum's Simon-Skjodt Center for the Prevention of Genocide released a report in January 2025 finding that "[a]ll of the state policies that have led to accusations of atrocity crimes in the Uyghur Region either continue or are currently expanding."¹⁶

Besides a presence in the Uyghur Region, international hotel chains operate within areas controlled by the Xinjiang Production and Construction Corps (XPCC) (新疆生产建设兵团),¹⁷ a paramilitary entity under targeted sanctions for its grave and systematic human rights violations.

Accor's Grand Mercure Urumqi¹⁸ Hualing hotel has conducted training and recruitment through a staterun "labor transfer" program.¹⁹ Furthermore, Accor's

prison-rate; and "China: Xinjiang Official Figures Reveal Higher Prisoner Count," Human Rights Watch, September 14, 2022, https://www.hrw.org/news/2022/09/14/china-xinjiang-official-figuresreveal-higher-prisoner-count.

¹⁰ "Uyghur Tribunal Judgment," Uyghur Tribunal, December 9, 2021, <u>https://uyghurtribunal.com/wp-content/uploads/2021/12/Uyghur-</u><u>Tribunal-Summary-Iudgment-9th-Dec-21.pdf</u>.

¹¹ "Human Rights: Xinjiang," Hansard, HC Deb 22 April 2021, vol. 692, cols. 1211–1235, <u>https://hansard.parliament.uk/Commons/2021-04-22/debates/6FA4F300-D244-443E-A48C-57378876DE54/Human RightsXinjiang</u>.

¹³ Other parliaments, including those in Belgium, Canada, Czechia, Lithuania, the Netherlands, the EU, and Taiwan have also recognized genocide in the Uyghur Region. See "China," Global Responsibility to Protect, December 1, 2024, <u>www.globalr2p.org/countries/china</u>.

¹⁴ "Determination of the Secretary of State on Atrocities in Xinjiang," US Department of State, January 19, 2021, <u>https://2017-2021.state.gov/</u> <u>determination-of-the-secretary-of-state-on-atrocities-in-xinjiang</u>.

¹⁵ "OHCHR Assessment of Human Rights Concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China," Office of the UN High Commissioner for Human Rights, 2022, <u>www.ohchr.org/en/doc</u> <u>uments/country-reports/ohchr-assessment-human-rights-concerns-</u> <u>xinjiang-uyghur-autonomous-region</u>.

¹⁶ Rian Thum, "Eight Years On, China's Repression of the Uyghurs Remains Dire," Simon-Skjodt Center for the Prevention of Genocide, US Holocaust Memorial Museum," March 2024, <u>https://vault.ushmm.org/</u> <u>adaptivemedia/rendition/id_f36afdaa9fbc0c6c7443b2a5c71025f8b51f45</u> <u>9d</u>.

¹⁷ Greg Fay, "The *Bingtuan*: China's Paramilitary Colonizing Force in East Turkestan," UHRP, April 26, 2018, <u>https://uhrp.org/report/thebingtuan-chinas-paramilitary-colonizing-force-in-east-turkestan/;</u> see also: Laura T. Murphy, Nyrola Elimä, and David Tobin "'Until Nothing is Left': China's Settler Corporation and its Human Rights Violations in the Uyghur Region," Helena Kennedy Centre for International Justice, July 2022, <u>https://www.shu.ac.uk/-/media/home/research/helena-</u> kennedy-centre/projects/until-nothing-is-left-docs/murphy-elimatobin----until-nothing-is-left.pdf.

¹⁸ Ürümchi and Urumqi refer to the capital city of the Uyghur Region. UHRP prefers the Uyghur Latin Yëziqi Ürümchi. For a fuller discussion on matters of toponyms and other naming practices, see: Mustafa Aksu, Dr. Elise Anderson, and Dr. Henryk Szadziewski, "Decolonizing the Discussion of Uyghurs: Recommendations for Journalists and Researchers," Uyghur Human Rights Project, December 21, 2022, https://uhrp.org/report/decolonizing-the-discussion-of-uyghursrecommendations-for-journalists-and-researchers.

¹⁹ Researchers and experts have identified that labor transfer programs amount to mechanisms for a massive program of forced labor, and are deeply intertwined with state-led strategies of control, assimilation, and securitization. See: Adrian Zenz, "The Conceptual Evolution of Poverty Alleviation through Labor Transfer in the Xinjiang Uyghur Autonomous Region," *Central Asian Survey*, October 2023, <u>https://ssrn.com/abstract=4612801</u>; Laura Murphy, "Forced Labor in the Uyghur Region: The Evidence," Sheffield Hallam Helena Kennedy Centre, <u>https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/evidence-briefs</u>; and Amy Lehr and Mariefaye Bechrakis, "Connecting the dots in Xinjiang,"

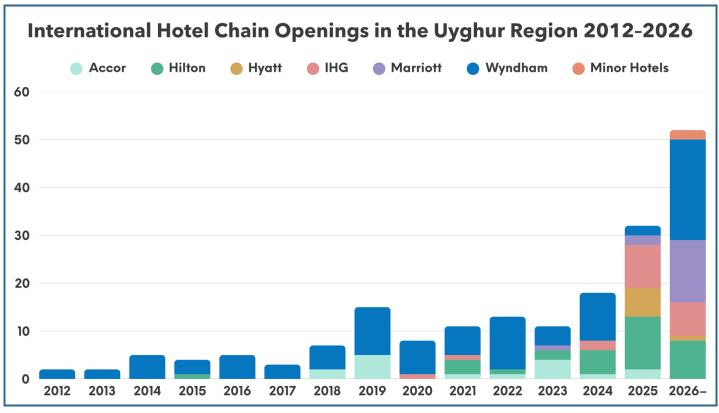


Chart 1: At the time of this report's publication (April 2025), ten hotels have opened—and another 22 are scheduled to open—in 2025. Outside the time-scale of this chart is the Grand Mercure Urumqi Hualing which opened in 2003.

strategic partner in China, H World Group Limited (华 住酒店集团) (H World), has used "Xinjiang Aid" (对口 援疆) programs for recruitment and training in its hotels.²⁰ Xinjiang Aid is a government labor transfer program identified by experts as a high-risk indicator of Uyghur forced labor.²¹

Ownership structures and management partnerships link Accor and Hilton to state-owned companies. State-owned enterprises (SOEs) are profit driven; however, SOEs are also leveraged to advance the interests of the Chinese government over marketdriven decisions.²² Hilton and IHG hotels have either hosted state propaganda events or promoted state narratives of Uyghur identity, traditions, and culture.

International hotel chains' presence in the Uyghur Region and in XPCC-administered areas, as well as links to forced labor programs and SOEs should initiate an immediate review of operations in the region. All five of the hotel chains analyzed in this report have pledged to adopt international human

Center for Strategic and International Studies, October 2019, https://www.csis.org/analysis/connecting-dots-xinjiang-forced-laborforced-assimilation-and-western-supply-chains.

²⁰ "援疆风采 吕煜文: 真情奉献青色草原 [Aid-Xinjiang Style, Lü Yuwen: Sincerely dedicated to the green grassland]," 微信 [Weixin], October 6, 2023, <u>https://archive.ph/LWrnA</u>.

²¹ Also known as "Pairing Assistance" or "Mutual Pairing Assistance," Xinjiang Aid is a Chinese government policy framed as a poverty alleviation program, but widely documented as a mechanism for forced labor, mass displacement, and ideological indoctrination targeting Uyghurs and other Turkic peoples in the Uyghur Region. See "Human Trafficking," Congressional-Executive Commission on China, 2021 Annual Report, <u>www.cecc.gov/sites/evo-subsites/cecc.house.gov/files/</u>

documents/2021%20AR%20Human%20Trafficking.pdf; see also: Adrian Zenz, "Coercive Labor and Forced Displacement in Xinjiang's Cross-Regional Labor Transfer Program," Jamestown Foundation, March 2021, https://jamestown.org/product /coercive-labor-and-forceddisplacement-in-xinjiangs-cross-regional-labor-transfer-program.

²² Wendy Leutert, "Challenges Ahead in China's Reform of State-Owned Enterprises," *Asia Policy*, 21, (2016), <u>https://dx.doi.org/10.1353/as</u> <u>p.2016.0013</u>; and Adrian Zenz, "Forced Labor in the Xinjiang Uyghur Autonomous Region: Assessing the Continuation of Coercive Labor Transfers in 2023 and Early 2024," Jamestown Foundation *China Brief*, 24, no. 5 (2024), <u>https://james_town.org/program/forced-labor-in-thexinjiang-uyghur-autonomous-region-assessing-the-continuation-ofcoercive-labor-transfers-in-2023-and-early-2024.</u>

rights standards through corporate social responsibility commitments and policies.²³ Only Accor, Hilton, and Marriott explicitly reference the prohibition of forced labor.

Far from simply maintaining a presence in the Uyghur Region, international hotel chains are actively expanding their operations, deepening their entanglement in a landscape of ongoing atrocities.

Far from simply maintaining a presence in the Uyghur Region, international hotel chains are actively expanding their operations, deepening their entanglement in a landscape of ongoing atrocities. This expansion stands in direct contradiction to these companies' own commitments to international human rights standards.²⁴ Hotel chains must abide by the UN Guiding Principles on Business and Human Rights, which outline the corporate responsibility to respect human rights, including the duty to avoid causing, contributing to, or being directly linked to human rights abuses through business operations. The aforementioned hotel chains' links to forced labor may also be in contravention of the International Labour Organization (ILO) Forced Labour Convention, first adopted in 1930 and ratified by 181 countries, including China, which prohibits all forms of forced or compulsory labor, and obligates ratifying states to suppress the use of forced labor in all forms.

This entanglement extends beyond hotel chains to the third-party booking platforms that profit from listings in the Uyghur Region. Websites including Booking.com, Priceline, Agoda, and Kayak (all owned by Booking Holdings, headquartered in the United States), Expedia.com, Hotels.com, Orbitz, Travelocity, and Trivago²⁵ (all owned by Expedia Group, headquartered in the United States), and Tripadvisor promote dozens of hotel listings across the region without reference to ongoing atrocities, further enabling hotel expansion.²⁶

This report demonstrates that international hotel chains are at high risk of contributing to human rights violations in the Uyghur Region. Operational presence, links to forced labor, and promotion of tourism that erases Uyghur culture and perpetuates revisionist narratives of atrocities reinforces the Chinese government's efforts to normalize repression and obscure ongoing abuses. This allows the Chinese government to continue to present the region as a benign travel destination detached from the realities of state-sponsored persecution.

III. Methodology

This report uses publicly available information. Initially, international hotel chains operating in East Turkistan were identified through an open search on Google and Baidu in August 2023. The physical presence and continuing operations of these hotels were confirmed through one or more of the following methods: (a) satellite imagery (b) inquiries submitted to popular travel websites, such as Agoda, Booking.com, CTrip, Hotels.com, and Tripadvisor (c) searches of hotel chains' main websites, and (d) direct calls to hotels. Through these methods, five international hotel chains were identified, operating a total of 23 hotels across the Uyghur Region.

²³ See Section VI.

²⁴ See Section VI.

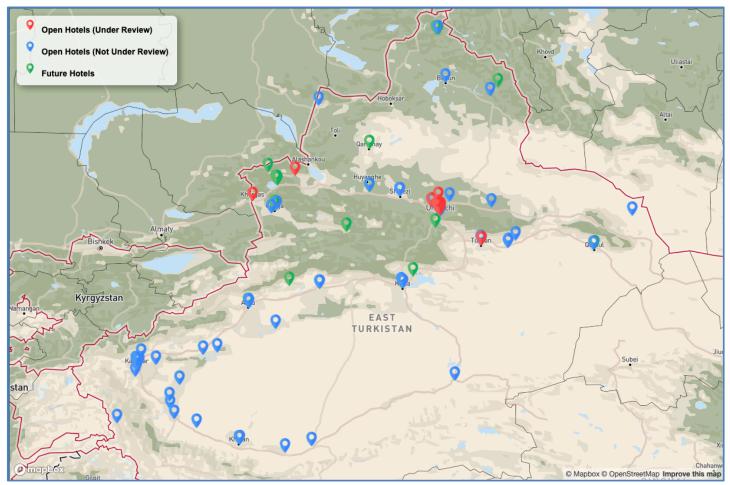
²⁵ Expedia Group holds a majority-stake in Trivago. See: Expedia, Inc. "Expedia Completes Acquisition of Majority Interest in trivago," March 12, 2013, <u>https://www.prnewswire.com/news-releases/expedia-completes-acquisition-of-majority-interest-in-trivago-197283431.html.</u>

²⁶ Priceline and Kayak are headquartered in the United States, while Booking.com is headquartered in the Netherlands, and Agoda in Singapore. Expedia.com, Hotels.com, Orbitz, and Travelocity are headquartered in the United States, and Trivago in Germany.

UHRP researchers examined Chinese government records, media articles, and corporate records to assess hotel chains' links to a set of risk indicators. These risks include ownership structures and franchise agreements between Chinese companies and international hotel chains, participation in state-led programs such as Xinjiang Aid and labor transfers, and hotel presence in areas administered by the XPCC. The scope of the research was limited to international hotel chains; however, Chinese-owned hotel chains are also active in the Uyghur Region. Further avenues for research include investigating hotels currently operating in the Uyghur Region outside the scope of UHRP's present analysis as well as hotels planned for opening in 2025 and beyond.

IV. International Hotel Chains: Risks of Presence in a Region Undergoing Atrocities

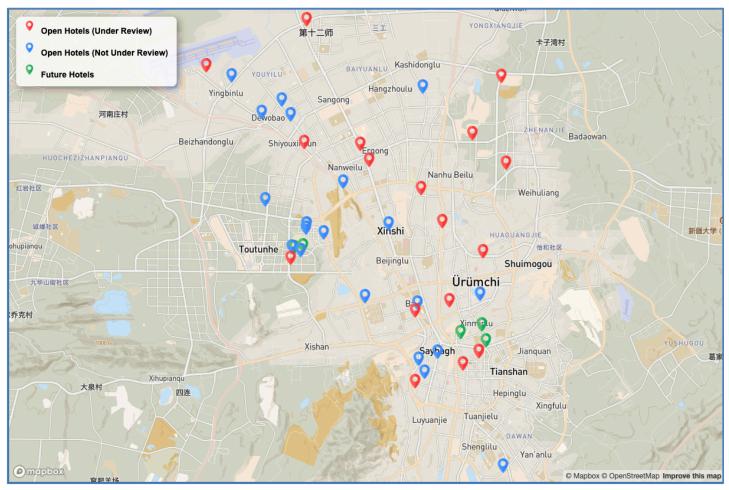
International hotel chains continue to entrench themselves in East Turkistan despite overwhelming evidence of widespread human rights abuses, including crimes against humanity and genocide.²⁷ These hotels do not operate in isolation from these



Map 1: International Hotel Chains' Presence in the Uyghur Region.

Judgment," Uyghur Tribunal, December 9, 2021, <u>https://uyghur</u> <u>tribunal.com/wp-content/uploads/2021/12/Uyghur-Tribunal-Summary-</u> Judgment-9th-Dec-21.pdf.

²⁷ "OHCHR Assessment of Human Rights Concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China," Office of the UN High Commissioner for Human Rights, August 2022, www.ohchr.org /en/documents/country-reports/ohchr-assessment-human-rightsconcerns-xinjiang-uyghur-autonomous-region; "Uyghur Tribunal



Map 2: International hotel chains' Presence in the Uyghur Region (Ürümchi).

abuses, but function within a system of state control that weaponizes the tourism industry in order to present the region as "normal" and open for international business and investment.²⁸ By offering high-end accommodations and leisure spaces, international hotel chains contribute to a sanitized image of the region, one that directly serves Beijing's propaganda objectives. The presence and expansion of these hotel chains aligns with state-driven efforts to normalize repression and obscure the reality of atrocities. Despite these risks, international hotel chains have not only maintained their presence in the region, but actively expanded operations. In addition to the 23 hotels reviewed in this report, 37 hotels opened between 2023 and April 2025, including a Hilton hotel in Khotan built on the site of a demolished mosque. The project garnered significant backlash in 2021,²⁹ but the hotel was completed and opened to guests in 2024.³⁰ In the final stages of research for this report, the authors found another 74 hotels in various stages of investment, planning, and construction from Accor,

²⁸ Henryk Szadziewski, "Genocide Tours: International Travel Companies in East Turkistan," UHRP, August 30, 2023, <u>https://uhrp.org</u> /<u>report/genocide-tours-international-travel-companies-in-east-</u> <u>turkistan</u>; and Henryk Szadziewski, "Genocide Tours: European Travel Companies in East Turkistan," UHRP, Janaury 17, 2024, <u>https://uhrp.org</u> /<u>report/genocide-tours-european-travel-companies-in-east-turkistan</u>.

²⁹ Sophia Yan, "Hilton hotel to be built in Xinjiang after China bulldozes mosque," *The Telegraph*, June 12, 2021, <u>https://archive.is/nHsnq</u>.
³⁰ "Hampton by Hilton Hotan," Hilton, accessed March 19, 2025, <u>https://www.hilton.com/en/hotels/htnhahx-hampton-hotan</u>.

Hilton, Hyatt, IHG, Marriott, Minor Hotels, and Wyndham.³¹

Many of the newly opened and planned hotels in East Turkistan are not only standard business accommodations located in major cities, but large luxury resorts designed to attract high-end travelers. Luxury hotel projects and high-end resorts stand in stark contrast to the lived reality of local Uyghur communities. These include resort projects in the mountains north of Altay City, where the Chinese government has substantially invested in ski resorts and winter sports facilities, particularly since the Beijing Winter Olympics in 2022.³² Other projects include a slew of at least eight hotels and resorts surrounding Sayram Lake in



Image 1: Rendering of the dual-branded Ritz-Carlton Urumqi, Westin Urumqi, and Aloft Urumqi under construction and set for opening in 2026.

³¹ See Table 4. The total number of hotels includes dual-branded hotels as separate entities.

³² "抓住北京冬奥契机 发挥得天独厚优势 把阿勒泰打造成为冰雪旅游胜地 促进全疆冰雪运动和冰雪旅游快速发展的调研报告 [Research report: Seize the opportunity of the Beijing Winter Olympics, give full play to unique advantages, build Altay into an ice and snow tourist destination, and promote the rapid development of ice and snow sports and ice and snow tourism in Xinjiang]," 新疆维吾尔自治区文化和旅游厅 [XUAR Department of Culture and Tourism], May 30, 2019, <u>https://wlt.xinjiang</u> .gov.cn/wlt/wltyw/201905/7003c45374114959835d96ff956c426e.shtml.

³³ CN: Sailimu Lake (赛里木湖).

³⁴ CN: Keketuohai National Geological Park (可可托海国家地质公园).



Image 2: Rendering of the dual-branded Conrad Altay Hemu Ski Resort, Canopy by Hilton Altay Hemu Ski Resort, and Hilton Hemu Ski Resort under construction and set for opening in 2026.

Bortala,³³ and a Sheraton hotel outside of Koktokay National Geopark in Altay.³⁴

Marriott plans to open a Ritz-Carlton hotel in Ürümchi in 2026, an opulent rendering of which shows the hotel standing in proximity to the Xinjiang International Convention and Exhibition Center.³⁵ Similarly, IHG plans to open an InterContinental Hotel in Ghulja City, the "InterContinental Yining" in the third quarter of 2025.³⁶ InterContinental is one of IHG's many sub-brands, and is touted as the "world's first international luxury hotel brand."³⁷ Renderings by the architectural firm designing the hotel categorize the project as a "luxury resort" attached to a convention center.³⁸

The hotel industry in the Uyghur Region is scheduled for significant growth, with the region's tourism

 ³⁵ "Ritz-Carlton Urumqi," Top Hotel Projects (paywall), accessed April
 3, 2025, <u>https://app.tophotelprojects.com/constructions/45087</u>.

³⁶ "InterContinental Yining," Top Hotel Projects (paywall), accessed April 3, 2025, <u>https://app.tophotelprojects.com/constructions/45090</u>.

³⁷ "InterContinental Hotels & Resorts," InterContinental Hotels Group, accessed March 24, 2025, <u>https://www.ihgplc.com/en/our-brands/inter continental</u>.

³⁸ "CGDG Xinjiang Beautiful China Resort Tourism Yining Hotel," HKS Architects, accessed March 24, 2025, <u>https://www.hksinc.com/what-we-do/projects/cgdg-xinjiang-beautiful-china-resort-tourism-yining-hotel/</u>.



Image 3: Rendering of the "InterContinental Yining" set for opening in the third quarter of 2025.

bureau set to spend over US\$97 million on luxury hotels and other accommodations.³⁹ From 2024 to 2026, the central Ministry of Culture and Tourism plans to boost the tourism industry in the Uyghur Region. Announced at the 2024 Xinjiang Tourism Development Conference, a central government initiative aims to increase investment in sectors including infrastructure and services.⁴⁰ In addition to their operational presence in the Uyghur Region, several hotels operate within areas controlled by the XPCC,⁴¹ or "*Bingtuan*," a paramilitary government entity and corporate conglomerate responsible for suppressing Uyghur life, culture, and identity through forced labor, land expropriation, and religious persecution.⁴² The XPCC is under targeted sanctions by the US, Canada, the UK, and the EU for grave and systematic human rights violations,⁴³ and three senior XPCC officials are subject to US sanctions due to their involvement in these human rights abuses.⁴⁴

IHG's Holiday Inn Express Urumqi Station is situated within the Ürümchi Economic and Technical Development Zone, which is run by the XPCC 12th Division.⁴⁵ Similarly, the Wyndham Urumqi North is located in Wujiaqu City, within the Bingtuan's 6th Division.⁴⁶

The Holiday Inn Express Horgos is located within the XPCC 4th Division.⁴⁷ Corporate data from the Chinese company which appears to manage the Wyndham Urumqi North states that its "registration authority" is

³⁹ "China: How Is Beijing Whitewashing Its Xinjiang Policy?" *Deutsche Welle*, January 24, 2024, <u>https://www.dw.com/en/china-how-is-beijing-whitewashing-its-xinjiang-policy/a-66779242</u>.

⁴⁰ "Xinjiang maps plan to welcome more domestic and intl travelers," *Global Times*, May 27, 2024, <u>https://www.globaltimes.cn/page/202405</u> /<u>1313106.shtml</u> and "2024 年自治区旅游发展大会召开 [2024 Autonomous Region Tourism Development Conference Held]," 天山网 [Tianshan.net], May 27, 2024, <u>https://www.ts.cn/xwzx/szxw/202405/</u> <u>t20240527_21549563.shtml</u>.

⁴¹ Greg Fay, "The *Bingtuan*: China's Paramilitary Colonizing Force in East Turkestan," UHRP, April 26, 2018, <u>https://uhrp.org/report/thebingtuan-chinas-paramilitary-colonizing-force-in-east-turkestan/</u>; see also Laura T. Murphy, Nyrola Elimä, and David Tobin "'Until Nothing is Left': China's Settler Corporation and its Human Rights Violations in the Uyghur Region," Helena Kennedy Centre for International Justice, July 2022, <u>https://www.shu.ac.uk/-/media/home/research/helena-</u> kennedy-centre/projects/until-nothing-is-left-docs/murphy-elimatobin----until-nothing-is-left.

⁴² Laura T. Murphy, Nyrola Elimä, and David Tobin "'Until Nothing is Left': China's Settler Corporation and its Human Rights Violations in the Uyghur Region," Helena Kennedy Centre for International Justice, July 2022, <u>https://www.shu.ac.uk/-/media/home/research/helenakennedy-centre/projects/until-nothing-is-left-docs/murphy-elima-</u>

tobin----until-nothing-is-left.pdf; Greg Fay, "The *Bingtuan*: China's Paramilitary Colonizing Force in East Turkestan," UHRP, April 26, 2018, https://uhrp.org/report/the-bingtuan-chinas-paramilitary-colonizing-force-in-east-turkestan/.

⁴³ "UK Sanctions Perpetrators of Gross Human Rights Violations in Xinjiang, alongside EU, Canada, and US," Gov.uk, March 22, 2021, <u>https://www.gov.uk/government/news/uk-sanctions-perpetrators-of-gross-human-rights-violations-in-xinjiang-alongside-eu-canada-and-us</u>.

⁴⁴ See: UHRP Sanctions Tracker, <u>https://uhrp.org/sanctions-tracker</u>.

⁴⁵ "聚焦自贸区 | 兵团乌鲁木齐经济技术开发区: 阔步新征程 奋力闯创干 [Free Trade Zone Focus - Corps Ürümchi Economic and Technological Development Zone: Stride forward on a new journey and strive to create new achievements]," 兵团新闻网 [Bingtuan News Network], November 22, 2023, <u>https://archive.ph/nxPIM</u>.

⁴⁶ "第六师五家渠市人民政府 [The 6th Division Wujiaqu Municipal People's Government], accessed on March 24, 2025, <u>http://www.wjq.go</u> <u>v.cn/</u>.

⁴⁷ "第四师可克达拉市概况 [Overview of Kokdala City, Fourth Division]," 第四师可克达拉市 [Fourth Division Kokdala City], February 17, 2025, <u>https://archive.ph/oYvxe</u>.

the XPCC 6th Division Market Supervision and Administration Bureau (新疆生产建设兵团第六师市场 监督管理局).48 Additionally, the Chinese company that appears to manage the Hampton by Hilton Urumqi International Airport, although not operating in an area administered by the XPCC, states in corporate records that its "registration authority" is the XPCC 12th Division Market Supervision and Administration Bureau (新疆生产建设兵团第十二师市场监督管理局).49

In addition to the hotels under review in this report, seven other hotels appear to be situated in XPCC-

administered areas, including the Mercure Urumqi High-speed Railway Station, Super 8 Hotel (Urumqi Economic Development Zone High-speed Railway Station South Square), Super 8 International Hotel (Urumqi High-speed Railway Station North Square), Super 8 Select Hotel (Urumqi High-speed Railway Station Passenger Terminal), Super 8 Hotel Beitun, Super 8 Select Hotel (Alar), and Super 8 Select Hotel (Tumushuke Municipal Government).⁵⁰

The following table lists the 23 hotels analyzed by UHRP for human rights and labor rights risks:

	Table 1: Hotels Operating in East Turkistan (Analyzed by UHRP)										
Hotel Chain	Hotel Brand	Hotel in East Turkistan	Open Year	Location	Risks						
Accor (France)	Grand Mercure	<u>Grand Mercure</u> <u>Urumqi Hualing</u>	2003	43°48'55"N 87°36'03"E	Presence in the Uyghur Region amid an ongoing genocide; exposure to Uyghur forced labor through participation in a poverty alleviation program (see Section V (ii)); ownership by Jin Jiang, a Chinese state- owned enterprise (see Section V (i)).						
	Mercure ⁵¹	<u>Mercure Urumqi</u> <u>South Lake</u>	2022	43°48'57"N 87°37'09"E							
		<u>Mercure Urumqi</u> <u>Doowin Wanda</u> <u>Plaza</u>	2021	43°47'11"N 87°35'02"E	Presence in the Uyghur Region amid an ongoing genocide; ownership by Jin Jiang, a Chinese state- owned enterprise (see Section V (i)); in cooperation						
		<u>Mercure Urumqi</u> <u>Downtown</u>	2019	43°52'15"N 87°33'24"E	with H World, a commercial entity benefitting from forced labor programs (see Section V (i)).						
		<u>Mercure Turpan</u> <u>Downtown</u>	2019	42°56'33"N 89°11'29"E							
	ibis ⁵²	<u>ibis Urumqi</u>	2019	43°52'18"N							

⁵¹ UHRP found one additional hotel operating under the Mercure brand in Ürümchi, the Mercure Urumqi High-speed Railway Station. The hotel is bookable via CTrip, but not on Accor's website. For this reason, the hotel has been excluded from the present analysis, but appears in Table 2 for completeness.

 $^{\rm 52}$ UHRP found two additional hotels operating under the ibis brand in Ürümchi. The first is the ibis Urumqi Nanhu Plaza, which first appeared on Accor's website for booking only in early 2025 but with reviews stretching back to 2022. The second is the ibis Hotel (Urumqi Youhao Mingyuan), which is bookable via CTrip but not on Accor's website. For

⁴⁸ Xinjiang Junhao Hotel Co., Ltd. shares its corporate address with the hotel. See: "Xinjiang Junhao Hotel Co., Ltd.," Riscern (paywall), accessed March 24, 2025, https://riscern.com/company-info?key= <u>K250331350045842040</u>.

⁴⁹ Xinjiang Silk Road Huanqiu Hotel Management Co., Ltd. shares its corporate address with the hotel. See: "Xinjiang Silk Road Huanqiu Hotel Management Co., Ltd.," Riscern (paywall), accessed March 24, 2025, https://riscern.com/company-info?key=K250328239932776780.

		<u>Weixing Square</u> <u>Hotel</u>		87°31'45"E	
		<u>ibis Changji</u> <u>Jianshe Road</u> <u>Snack Street</u>	2018	44°01'29"N 87°18'51"E	
		<u>ibis Urumqi</u> <u>Railway Station</u>	2018	43°51'55"N 87°33'40"E	
	Conrad	<u>Conrad Urumqi</u>	2021	43°49'11"N 87°35'11"E	
	Hilton	<u>Hilton Urumqi</u>	2015	43°52'29"N 87°36'44"E	Presence in the Uyghur Region amid an ongoing genocide; managed by the Plateno Hotel Group owned
		<u>Hampton by</u> <u>Hilton Turpan</u>	2023	42°56'51"N 89°10'38"E	by Jin Jiang International, a Shanghai-based corporation majority-owned by the Chinese state (see Section V (i)); promotes Chinese state propaganda (see
Hilton (USA)	Hampton	<u>Hampton by</u> <u>Hilton Urumqi</u> <u>Exhibition</u> <u>Center</u>	2021	43°51'51"N 87°37'44"E	Section V (iii)). *Xinjiang Silk Road Huanqiu Hotel Management Co., Ltd., which appears to manage the Hampton by Hilton Urumqi International Airport, states in corporate
		<u>Hampton by</u> <u>Hilton Urumqi</u> <u>International</u> <u>Airport</u> *	2021	43°54'55"N 87°31'49"E	records that its "registration authority" is the XPCC 12 th Division Market Supervision and Administration Bureau (新疆生产建设兵团第十二师市场监督管理局). The Hampton by Hilton Urumqi International Airport is not operating in an XPCC-administered area.
	Home2 Suites	<u>Home2 Suites by</u> <u>Hilton Xinjiang</u> <u>Bole</u>	2022	44°52'06"N 82°03'22"E	
	Holiday Inn	<u>Holiday Inn</u> Express Horgos	2021	44°10'26"N 80°25'19"E	Presence in the Uyghur Region amid an ongoing genocide; located in area administered by the XPCC (see Section IV).
IHG (UK)	Holiday Inn Express	<u>Holiday Inn</u> <u>Express Urumqi</u> <u>Station</u>	2020	43°49'49"N 87°31'21"E	Presence in the Uyghur Region amid an ongoing genocide; located in area administered by the XPCC (see Section IV); promotes Chinese state propaganda (see Section V (iii)).
Marriott (USA)	Sheraton Hotels and Resorts/ Four Points by Sheraton	<u>Four Points by</u> <u>Sheraton Urumqi</u>	2023	43°53'42"N 87°37'35"E	Presence in the Uyghur Region amid an ongoing genocide.
Wyndham (USA)	Wyndham	<u>Wyndham</u> <u>Urumqi North</u>	2015	44°10'30"N 87°32'31"E	Presence in the Uyghur Region amid an ongoing genocide; located in area administered by the XPCC (see Section IV).

this reason, these hotels are not under analysis in the present report, but are included in Table 2 for completeness.

		<u>Super 8 Hotel</u> (Urumqi People's <u>Cinema</u>)	2019	43°47'50"N 87°36'55"E	Presence in the Uyghur Region amid an ongoing genocide.
		<u>Super 8 Hotel</u> (<u>Urumqi Museum</u> <u>Hami Road)</u>	2014	43°48'42"N 87°35'02"E	Presence in the Uyghur Region amid an ongoing genocide.
	Super 8 ⁵³	<u>Super 8 Hotel</u> (<u>Urumqi</u> Liyushan Branch)	2013	43°51'19"N 87°35'12"E	Presence in the Uyghur Region amid an ongoing genocide.
		<u>Super 8 Hotel</u> (<u>Urumqi</u> <u>Daximen</u> <u>People's Square)</u>	2012	43°47'34"N 87°36'27"E	Presence in the Uyghur Region amid an ongoing genocide.
	Super 8 Select	<u>Super 8 Select</u> <u>Hotel (Urumqi</u> <u>Airport)</u>	2014	43°53'56"N 87°28'50"E	Presence in the Uyghur Region amid an ongoing genocide.

Since research for this report began in 2023, UHRP researchers have discovered 27 additional hotels that opened between mid-2023 and April 2025, demonstrating a significant increase in the number of hotels from international chains in the Uyghur Region. An additional 74 hotels were found in various stages of investment, planning, and construction, 22 of which are planned for openings in 2025.⁵⁴

In one problematic case involving Hilton, *The Telegraph* reported in June 2021 that Huan Peng Hotel Management, a Hampton by Hilton franchisee, was constructing a hotel on the site of a demolished mosque in Khotan.⁵⁵ In a follow up report in September 2023, *The Telegraph* highlighted a boycott of Hilton Worldwide by a coalition of 40 organizations, including UHRP, as well as a letter from the US Congressional-Executive Commission on China (CECC) urging an end to the hotel's construction.⁵⁶ In response, Hilton distanced itself from its role in the selection of the site, stating that its corporate franchise model "limits Hilton's involvement in the development and management of properties."⁵⁷

Building a hotel on the site of a demolished mosque is particularly egregious given that the Chinese

⁵³ Wyndham <u>licences</u> the Super 8 brand to Tian Rui Hotel Group (天瑞酒店集团), which manages the brand's operations across China with bookings made through Super 8's website at <u>www.super8.com.cn</u>. In March 2025, UHRP found an additional 67 Super 8 hotels bookable on <u>super8.com.cn</u>, as well as one Super 8 bookable via CTrip, which appears open and can be found in Table 2. UHRP found a further five Super 8 hotels visible on Ctrip, but could not confirm whether the hotels remained open (<u>Super 8 Hotel (International Grand Bazaar</u>), <u>Super 8 Select Hotel (Kashgar Ancient City</u> <u>Hengchang Branch</u>), <u>Super 8 Hotel (Qiemo Yucheng Branch</u>), <u>Super 8 Hotel (Farmer's Market</u>), and <u>Super 8 Hotel (Shanshan Kumtag Mukam Road Branch</u>). The first Super 8 hotel in the Uyghur region opened in Urümchi in 2007. See: "速8中国八月再添三家新酒店 [Super 8 China adds three new hotels in August]," *环球旅讯* [*Travel Daily*], August 8, 2007, <u>https://m.traveldaily.cn/article/14877</u>).

⁵⁴ See Table 4.

⁵⁵ Sophia Yan, "Hilton hotel to be built in Xinjiang after China bulldozes mosque," *The Telegraph*, June 12, 2021, <u>https://archive.is/nHsnq</u>.

⁵⁶ Sophia Yan, "Calls for global boycott of Hilton over hotel built on bulldozed mosque in Xinjiang," *The Telegraph*, September 16, 2024, <u>https://archive.is/qaena</u>; and Brooke Anderson, "Hilton boycott launched as firm presses on with hotel on Uighur mosque site," *The New Arab*, September 16, 2024, <u>https://www.newarab.com/news/hilton-boycott-launched-over-plan-hotel-uighur-site</u>.

⁵⁷ "Muslim groups call for Hilton boycott over project in China," Associated Press, September 16, 2024, <u>https://www.seattletimes.com</u> /business/muslim-groups-call-for-hilton-boycott-over-project-in-china/.



Top left: Khotan mosque (October 2017). Top right: Mosque demolished and site prepared (September 2018). Bottom left: Hotel construction begins (May 2021). Bottom right: Construction nears completion (October 2022). Source: Google Earth.

authorities have undertaken a broad campaign to drastically reduce the number of mosques and other religious sites across the Uyghur Region since 2017.⁵⁸ Experts estimate that between 2017 and 2020, the Chinese authorities destroyed or damaged approximately 16,000 mosques in the region (65 percent of the total), with around 8,500 completely razed.⁵⁹ This program to demolish mosques ran parallel to other programs targeting graveyards and shrines within a broader effort of cultural erasure.⁶⁰

In the final stages of compiling this report, UHRP researchers found that beginning around February 2025, Hilton began advertising the hotel built on the ruins of the mosque in Khotan on its website, describing it as a "new hotel."⁶¹ The hotel can be found on the Chinese booking site CTrip, with reviews dating back to the middle of 2024, but as of March 2025 the hotel was not visible on Google Maps or any English-language travel booking sites.⁶²

⁵⁸ Nathan Ruser, James Leibold, Kelsey Munro, and Tilla Hoja, "Cultural Erasure: Tracing the Destruction of Uyghur and Islamic Spaces in Xinjiang," ASPI International Cyber Policy Centre, September 2020, <u>https://www.aspi.org.au/report/cultural-erasure</u>; see also: Bahram K. Sintash, "Demolishing Faith: The Destruction and Desecration of Uyghur Mosques and Shrines," UHRP, October 2019, <u>https://uhrp.org</u> /report/demolishing-faith-the-destruction-and-desecration-of-uyghurmosques-and-shrines.

⁶⁰ Chris Buckley and Austin Ramzy, "China Is Erasing Mosques and Precious Shrines in Xinjiang," *New York Times*, September 25, 2020, <u>https://www.nytimes.com/interactive/2020/09/25/world/asia/xinjiangchina-religious-site.html</u>.

⁶¹ "Hampton Inn by Hilton Hotan," Hilton, Accessed March 18, 2025, <u>https://www.hilton.com/en/hotels/htnhahx-hampton-hotan/</u>.

⁶² "和田希尔顿欢朋酒店 [Hampton by Hilton Hotan]," 携程旅行 [CTrip], Accessed March 18, 2025, <u>https://hotels.ctrip.com/hotels/120265273</u>..<u>html</u>.

Table 2: Hotels Opened in East Turkistan, 2012 to 2025 (Outside UHRP's Analysis)						
Hotel Chain	Hotel Brand	Hotel in East Turkistan	Opening Year	Location		
		Mercure Hotan Downtown	2025	37°06'33"N 79°55'43"E		
		Mercure Urumqi Airport	2024	43°53'12"N 87°31'05"E (approximate location)		
	Mercure	Mercure Urumqi Beijing Road	2023	43°51'15"N 87°34'09"E		
Accor		Mercure Kashgar Ancient City	2023	39°28'03"N 75°59'49"E		
(France)		Mercure Kashgar Downtown (Wanda Plaza)	2023	39°28'01"N 75°59'39"E		
		Mercure Urumqi High-speed Railway Station ⁶³	2023	43°50'22"N 87°32'19"E		
		<u>ibis Urumqi Nanhu Plaza</u>	2019	43°48'55"N 87°36'47"E		
	ibis	ibis Hotel (Urumqi Youhao Mingyuan)	2019	43°48'52"N 87°35'06"E		
		Home2 Suites by Hilton Kashi Ancient City	2025	39°27'06"N 75°58'10"E		
	Home2 Suites	Home2 Suites by Hilton Xinjiang Kuche	2023	41°42'28"N 82°58'53"E		
	Hampton by Hilton Hilton Garden Inn	Hampton by Hilton Urumqi High-speed Railway Station	2025	43°51'04"N 87°30'35"E (approximate location)		
		Hampton by Hilton Urumqi Innovation Plaza	2025	43°53'29"N 87°35'16"E		
Hilton (USA)		Hampton by Hilton Tacheng	2025	46°44'03"N 82°58'02"E		
		Hampton by Hilton Kashgar	2024	39°27'00"N 76°03'20"E		
		Hampton by Hilton Hami	2024	42°49'10"N 93°29'13"E		
		Hampton by Hilton Hotan	2024	37°06'07"N 79°55'55"E		
		Hilton Garden Inn Aksu Downtown	2024	41°10'01"N 80°16'21"E		
	DoubleTree by Hilton	DoubleTree by Hilton Altay Fuyun	2024	46°59'03"N 89°31'22"E		
		UrCove Kashgar Ancient City Kunlun Tower Resort	2025	39°28'41"N 75°59'25"E		
Hyatt (USA)	UrCove	UrCove Kashgar Ancient City	2025	39°28'41"N 75°59'25"E		
1.jutt (00/1)	UICOVE	UrCove Aksu Century Square	2025	41°10'47"N 80°16'36"E (approximate location)		
IHG (UK)	Holiday Inn	Holiday Inn Resort Hotel Kanas Hemu ⁶⁴	2024	48°34'18"N 87°31'14"E (approximate location)		
		Holiday Inn Express Turpan	2024	42°56'59"N 89°09'55"E		

⁶³ The Mercure Urumqi High-speed Railway Station appears to be operating in an area administered by the XPCC.

⁶⁴ The Holiday Inn Resort Hotel Kanas Hemu is dual-branded with the Indigo Kom-Kanas. The Indigo Kom-Kanas is scheduled to open in late 2025 (see Table 4).

	Wingate By Wyndham	Wingate by Wyndham Urumqi Railway Station	2024	43°50'04"N 87°31'23"E
		<u>Super 8 International Hotel (Children's Village</u> <u>Beisheng Square Branch)</u>	2025	43°49'00"N 87°33'33"E
		Super 8 International Hotel (Urumqi High-speed Railway Station North Square) ⁶⁵	2024	43°50'33"N 87°31'49"E
		<u>Super 8 Hotel (Urumqi Economic Development Zone</u> <u>High-speed Railway Station South Square)</u> ⁶⁶	2024	43°49'59"N 87°31'38"E
		<u>Super 8 Hotel (Urumqi Airport Dadiwopu Subway</u> <u>Station)</u>	2024	43°53'43"N 87°29'36"E
		Super 8 Hotel (Yutian New Era Pedestrian Street)	2024	36°51'32"N 81°40'30"E
		<u>Super8 Hotel Kashgar Ancient City Kunlun Tower</u> <u>Branch</u>	2024	39°28'28"N 75°59'55"E
		Super 8 Hotel Beitun ⁶⁷	2023	47°19'54"N 87°48'57"E
		Super 8 Hotel (Aksu Central Bus Station)	2022	41°09'28"N 80°17'07"E
	Super 8	<u>Super 8 Hotel Caohu Town Chang'an North Road</u> <u>Branch</u>	2022	39°17'18"N 76°00'56"E
Wyndham (USA)		<u>Super 8 Hotel (Hotan Tuanjie Square)</u>	2021	37°06'37"N 79°55'06"E
(03A)		Super 8 Hotel (Pishan)	2021	37°36'29"N 78°16'50"E
		<u>Super 8 Hotel (Kashgar Ancient City Jiefang South</u> <u>Road)</u>	2021	39°27'40"N 75°59'15"E
		Super 8 Hotel Akto Pedestrian Street Branch	2021	39°08'56"N 75°56'23"E
		Super 8 Hotel (Oitai Tuanjie South Road)	2020	43°59'12"N 89°34'18"E
		Super 8 Hotel (Urumqi Wuyi Road)	2019	43°47'23"N 87°35'19"E
		<u>Super 8 Hotel (Kuqa Railway Station Tianshan Road</u> <u>Branch)</u>	2019	41°42'36"N 83°00'27"E
		Super 8 Hotel (Hejing Swan Lake Road)	2019	42°19'08"N 86°23'04"E
		Super 8 Hotel (Shanshan Xincheng East Road)	2019	42°53'36"N 90°14'12"E
		Super 8 Hotel (Turpan Wenhua West Road)	2019	42°56'43"N 89°10'22"E
		<u>Super 8 Hotel Turpan Gaochang District Xinzhan</u> <u>Branch</u>	2019	42°58'40"N 89°10'31"E
		Super 8 Hotel (Toksun Shengyuan Branch)	2019	42°47'11"N 88°37'22"E
		Super 8 Hotel (Super 8 Hotel Kuitun Beijing West Road)	2018	44°25'29"N 84°53'46"E
		Super 8 Hotel (Korla Tianshan West Road)	2018	41°47'03"N 86°07'47"E

⁶⁵ The Super 8 International Hotel (Urumqi High-speed Railway Station North Square) appears to be operating in an area administered by the XPCC.

⁶⁶ The Super 8 Hotel (Urumqi Economic Development Zone High-speed Railway Station South Square) appears to be operating in an area administered by the XPCC.

⁶⁷ The Super 8 Hotel Beitun is operating in an area administered by the XPCC.

	Super 8 Hotel (Fukang City Zhungar Road)	2018	44°08'58"N 87°58'24"E
	<u>Super 8 Hotel (Shanshan Railway Station Town Tuha</u> <u>Oilfield Branch)</u>	2017	43°04'40"N 90°29'46"E
	Super 8 Hotel (Shanshan Kumtag Desert Branch)	2017	42°51'54"N 90°12'33"E
	Super 8 Hotel (Urumqi Nanhu Branch)	2016	43°49'03"N 87°36'57"E
	Super 8 Hotel Korla Times Garden Branch	2016	41°43'49"N 86°10'35"E
	Super 8 Hotel (Gaochang Middle Road)	2016	42°56'48"N 89°10'38"E
	Super 8 Hotel (Korla Petrochemical Avenue)	2014	41°43'14"N 86°11'37"E
	Super 8 Hotel (Shihezi University Branch)	2014	44°17'59"N 86°02'54"E
	Super 8 Hotel Urumqi (Yingbin Road)	2013	43°52'56"N 87°30'29"E
	<u>Super 8 Hotel (Xinjiang University Tianshan Vanke</u> <u>Plaza)</u>	2012	43°45'23"N 87°37'38"E
	Super 8 Select Hotel (Alar) ⁶⁸	2025	40°33'42"N 81°17'59"E
	<u>Super 8 Select Hotel (Urumqi Degang Wanda Plaza</u> <u>Diwopu Airport Branch)</u>	2024	43°52'53"N 87°31'21"E
	<u>Super 8 Select Hotel (Kashgar University Xinquan</u> <u>Campus)</u>	2024	39°26'54"N 76°06'04"E
	Super 8 Select Hotel (Kashgar Administrative Approval Bureau Xiaoyalang Wetland Park Branch)	2024	39°27'07"N 76°03'21"E
	<u>Super 8 Select Hotel (Kashgar Ancient City Xiyu</u> <u>Avenue)</u>	2024	39°27'53"N 75°57'57"E
	Super 8 Select Hotel (Yining Zhongyuan Branch)	2023	43°56'03"N 81°21'07"E
	Super 8 Select Hotel (Naomaohu Town)	2023	43°45'29"N 94°58'38"E
	Super 8 Select Hotel (Xinjiang Grand Theater)	2023	44°00'14"N 87°18'51"E
Super 8 Select	Super 8 Select Hotel (Kashgar Yingjisha Ancient Street)	2022	38°55'41"N 76°10'29"E
	Super 8 Select Hotel (Jiashi County People's Hospital)	2022	39°30'02"N 76°44'21"E
	Super 8 Select Hotel (Kashgar Ancient City Food Street)	2022	39°27'36"N 75°58'19"E
	<u>Super 8 Select Hotel (Shule County Shengli North</u> <u>Road)</u>	2022	39°24'24"N 76°02'58"E
	Super 8 Select Hotel (Kashgar Ancient City Scenic Area)	2022	39°28'08"N 75°59'36"E
	<u>Super 8 Hotel Select Bachu County Century Avenue</u> <u>Branch</u>	2022	39°47'49"N 78°32'20"E
	Super 8 Select Hotel (Ruoqiang Loulan Cultural Park)	2022	39°01'41"N 88°09'59"E
	Super 8 Select Hotel (Hami Railway Station Youyi Road)	2022	42°50'35"N 93°29'41"E
	<u>Super 8 Select Hotel (Kashgar Ancient City Yingbin</u> <u>Avenue)</u>	2022	39°29'56"N 75°59'57"E

 $^{^{\}rm 68}$ The Super 8 Select Hotel (Alar) is operating in an area administered by the XPCC.

Super 8 Select Hotel (Maigaiti)	2021	38°54'02"N 77°37'42"E
Super 8 Select Hotel (Shihezi Century Plaza)	2021	44°17'42"N 86°04'40"E
Super 8 Select Hotel (Zep Fatong Park)	2020	38°11'21"N 77°15'52"E
Super 8 Select Hotel (Kashgar Ancient City Convention and Exhibition Center)	2020	39°27'48"N 76°01'26"E
<u>Super 8 Select Hotel (Urumqi Yangzijiang Road South</u> <u>Railway Station)</u>	2020	43°47'49"N 87°35'42"E
<u>Super 8 Select Hotel (Kashgar Ancient City People's</u> <u>Square)</u>	2020	39°27'57"N 75°59'09"E
Super 8 Select Hotel (Tumushuke Municipal Government) ⁶⁹	2020	39°51'37"N 79°04'10"E
Super 8 Select Hotel Kezhou People's Hospital Pamir Road Branch	2020	39°42'43"N 76°09'47"E
Super 8 Select Hotel (Yecheng Wenhua East Road)	2019	37°52'56"N 77°25'46"E
Super 8 Select Hotel Taxkorgan County China-Pakistan Friendship Road	2019	37°45'32"N 75°13'57"E
Super 8 Hotel (Hotan Yingbin Road)	2018	37°06'22"N 79°55'35"E
Super 8 Select Hotel (Urumqi High-speed Railway Station Passenger Terminal) ⁷⁰	2018	43°50'28"N 87°31'49"E
Super 8 Select Hotel (Turpan Gaochang Grape Valley Branch)	2017	42°57'16"N 89°11'22"E
Super 8 Select Hotel Minfeng County Lanpa South Road Branch	2016	37°03'22"N 82°41'27"E
Super 8 Hotel (Chabuchaer Leye Plaza)	2016	43°49'42"N 81°09'02"E
Super 8 Select Hotel (Shache Tuanjie Road)	2015	38°24'38"N 77°14'21"E
<u>Super 8 Hotel Kashgar Ancient City Huanjiang</u> <u>Department Store</u>	2015	39°27'59"N 75°58'44"E
<u>Super 8 Select Hotel (Urumqi Nianzigou Dehui Wanda</u> <u>Branch)</u>	2014	43°47'40"N 87°35'08"E

V. Other Risks Identified

International hotel chains operating in the Uyghur Region have varying levels of connection to Chinese entities responsible for carrying out widespread human rights abuses. These relationships involve ownership stakes by Chinese state-owned enterprises, participation in government labor transfer programs that amount to forced labor, and complicity in state propaganda efforts that erase Uyghur identity, which are part of cultural genocide, and are identified in more detail below.

⁶⁹ The Super 8 Select Hotel (Urumqi High-speed Railway Station Passenger Terminal) appears to be operating in an area administered by the XPCC.

⁷⁰ The Super 8 Select Hotel (Tumushuke Municipal Government) is operating in an area administered by the XPCC.

(i) Ownership Structures and Management Partnerships

Accor, Hilton, and Jin Jiang International: One of Accor's largest shareholders is the Shanghai-based corporation Jin Jiang International (Holdings) Co., Ltd. (锦江国际 (集团) 有限公司), a hospitality company listed on the Shanghai stock exchange and majorityowned by the Chinese state.⁷¹ Ownership ties between international corporations and Chinese state-owned enterprises pose several risks, including opacity, exploitative labor practices, and reliance on statebacked capital. In the case of the Uyghur Region, international hotel chains' financial engagements with Chinese state-owned enterprises not only generate profit for a government implicated in crimes against humanity, but also support the normalization of its policies which directly target the Uyghur community.

Jin Jiang raised its stake in Accor to 5.5 percent in January 2016, in the process becoming its secondlargest shareholder.⁷² Jin Jiang then raised its stake to 15.06 percent in May 2016 and was reportedly considering increasing its shares by up to 29 percent.⁷³ Following public pressure from the French government, the purchase did not go ahead.⁷⁴ As of March 12, 2024, it holds 5.33 percent ownership, making it one of Accor's largest shareholders.⁷⁵

Jin Jiang's investment in Accor was part of its strategy to expand globally and strengthen its position to compete with H World, Jin Jiang's main competitor in China's hospitality sector. As of 2023, Jin Jiang International Hotels had 12,448 hotels in operation across China. In contrast, H World had around 9,394 hotels in operation.⁷⁶ By the end of 2024, the number of hotels invested and managed by Jin Jiang International exceeded 14,120, distributed across more than 100 countries, ranking Jin Jiang as the second-largest hotel company in the world.⁷⁷

The Shanghai State-owned Assets Supervision and Administration Commission (SASAC) (上海市国有资产 管理委员会) holds a direct and indirect ownership stake of 90 percent in Jin Jiang, with the remaining 10 percent owned by the Shanghai Municipal Bureau of Finance.⁷⁸ Under state ownership, Jin Jiang closely aligns its business interests with central government policies, such as the Belt and Road Initiative and "Going Out," which encourages commercial entities to invest overseas.⁷⁹ Beginning in 2023, Jin Jiang has been pursuing a three to five year business strategy of "bringing in" overseas brands into the China market

⁷¹ "Accor and Jin Jiang International Sign an Agreement to Strengthen Their Partnership," Accor, July 19, 2016, <u>https://group.accor.com/api/</u> <u>accorhotels/PressRelease/GetFile/?id=750a2d6a-346c-4d32-934b-</u> <u>e1c572f83202</u>.

⁷² "China's Jin Jiang Raises AccorHotels Stake to 5.5 Pct.," Reuters, February 2, 2016, <u>https://www.reuters.com/article/business/chinas-jin-jiang-raises-accorhotels-stake-to-55-pct-idUSL8N15G2C6</u>.

⁷³ Vinicy Chan, Manuel Baigorri, and Dinesh Nair, "China's Jin Jiang Said to Weigh Boosting Stake in Hotelier Accor," Bloomberg, April 12, 2016, <u>https://www.bloomberg.com/news/articles/2016-04-12/china-s-jin-jiang-said-to-weigh-boosting-stake-in-hotelier-accor</u>.

⁷⁴ "AccorHotels Staves off Takeover Bid by Shanghai's Jin Jiang," *Hotel Management*, November 10, 2015, <u>https://www.hotelmanagement.net/</u><u>legal/accorhotels-staves-off-takeover-bid-by-shanghai-s-iin-jiang</u>.

⁷⁵ "AccorHotels and Jin Jiang International Announce a Strategic Partnership," Accor, December 14, 2015, <u>https://group.accor.com/api/</u> <u>accorhotels/PressRelease/GetFile/?id=750a2d6a-346c-4d32-934b-</u> <u>e1c572f83202</u>.

⁷⁶ "Leading chain-branded hotel companies in China as of 2023, based on number of hotels," Statista, accessed March 24, 2025,

https://www.statista.com/statistics/1188362/china-leading-chainhotels-by-number-of-hotels/.

⁷⁷ "关于我们 [About Us]," 锦江国际集团 [Jin Jiang International Group], Jin Jiang International, accessed March 24, 2025, www.jinjiang.com. ⁷⁸ "Jin Jiang International Holdings Co., Ltd. - Business Profile," S&P Global Ratings, March 2021, https://disclosure.spglobal.com/ratings/en/ regulatory/article/-/view/sourceId/12798229; "HNA Sells Radisson Holdings to Jin Jiang-Led Consortium," Reuters, April 19, 2018, https://www.reuters.com/article/us-hna-radisson-hotel-sale/hna-sellsradisson-holdings-to-jin-jiang-led-consortium-idUSKBN1KV0U7; and "Radisson Hospitality Inc. Issues Statement Following Completion of Acquisition by Jin Jiang International Holdings Co., Ltd.," Radisson Hotel Group, January 19, 2019, https://web.archive.org/web/20190 119121245/https://www.radissonhotelgroup.com/media_pressreleases&article=radisson-hospitality-inc-issues-statement-followingcompletion-of-acquisition-by-jin-jiang-international-holdings-co-ltd. ⁷⁹ "锦江国际集团加快酒店主业深度国际化 [Jin Jiang International Group accelerates the internationalization of its hotel business]," 上海市国有 资产监督管理委员会 [Shanghai State-owned Assets Supervision and Administration Commission], October 26, 2023, www.gzw.sh.gov.cn/s hgzw zxzx gqdt/20231026/0b58efcedf884441be0245388b57f94c.html and https://archive.ph/aligG.

and expanding the number of rooms available.⁸⁰ Since 2015, Jin Jiang has successively purchased the domestic Vienna Hotel Group, Plateno Hotel Group, the international Louvre Hotel Group, and the Radisson Hotel Group, while also making other smaller acquisitions, at a cumulative cost of over US\$5.6 billion.⁸¹

Given these ownership and licensing arrangements with a Chinese statecontrolled enterprise, Accor and Hilton financially benefit and advance the interests of a government responsible for crimes against humanity.

Jin Jiang oversees a portfolio of more than 40 brands, of which two are located in the Uyghur Region. The first is the Hampton by Hilton brand, licensed to the Plateno Group, which, as noted above, is also owned by Jin Jiang.⁸² In an agreement between Jin Jiang and Plateno, Plateno is "fully responsible" for the development and operation of Hampton by Hilton

https://finance.sina.cn/2020-12-10/detail-iiznctke5645665.d.html.

hotels from October 2014 through 2034.⁸³ Three Hampton by Hilton hotels are located in the Uyghur Region—two in Ürümchi (Urumqi Exhibition Center and Urumqi International Airport) and one in Turpan (Hampton by Hilton Turpan).⁸⁴

The second brand is Radisson Blu. The Radisson Blu Kashgar opened in 2014.⁸⁵ The hotel was originally part of the Carlson Rezidor Hotel Group, based in Belgium, which managed Radisson-branded hotels globally until the company was bought by HNA Group, a Chinese conglomerate, in 2016.⁸⁶ In 2018, Carlson Rezidor Hotel Group was rebranded as the Radisson Hotel Group, and in 2019 it was acquired by Jin Jiang.⁸⁷ Today, the Radisson Blu Hotel Kashgar remains part of Radisson Hotel Group under Jin Jiang's ownership.⁸⁸

Given these ownership and licensing arrangements with a Chinese state-controlled enterprise, Accor and Hilton financially benefit and advance the interests of a government responsible for crimes against humanity.

Accor and H World Group Limited (华住酒店集团): In December 2014, Accor signed a long-term agreement to form a strategic alliance with Huazhu

⁸⁰ Ibid.

⁸¹ "Hotel conglomerate Jin Jiang consolidates China units," China Travel News, May 26, 2020, <u>https://www.chinatravelnews.com</u> /article/138049.

⁸² "希尔顿与锦江国际集团续签欢朋合作协议 延长至2034年 [Hilton and Jin Jiang International Group Renew Hampton Partnership Agreement to 2034],"新浪财经 [Sina Finance], December 9, 2020,

⁸³ "Hampton by Hilton Launches New Chapter in China," *Hilton Stories*, March 12, 2024, <u>https://stories.hilton.com/apac/releases/hampton-by-hilton-launches-new-chapter-in-china</u>; "3年了,希尔顿欢朋酒店在国内的发展怎么样? [After 3 years, how is Hampton by Hilton in China developing?]" 搜狐 [Sohu], January 15, 2018, <u>https://www.sohu.com/a/214832606_99993847</u>; and "中国富有创新影响力的企业之一 [One of China's most innovative and influential companies]," Plateno Group, accessed on March 24, 2025, <u>https://www.plateno.cc/pages/group/</u>.

⁸⁴ The Hampton by Hilton Turpan hotel is included in a notice posted on February 18, 2024 to a WeChat page of the Daheyan Town Party Committee (大河沿镇党委宣) to recruit ten workers for the hotel. The preface to the recruitment listings includes information from the Gaochang District Human Resources and Social Security Bureau (高昌区 人力资源与社会保障局) with explicit reference to "solving the employment of surplus urban and rural labor," signalling a high-risk indicator of forced labor. See "吐鲁番市高昌区2月份就业招聘信息

[[]Turpan Gaochang District February employment recruitment information]," 大河沿镇党委宣 大河沿日记 [Daheyan Town Party Committee, Daheyan Diary], February 18, 2024, <u>https://archive.is</u>/LNASB.

⁸⁵ "Radisson Blu Kashgar," Radisson Hotels, accessed March 19, 2025, <u>https://www.radissonhotels.com/en-us/hotels/radisson-blu-kashgar</u>.

⁸⁶ "China's HNA Group Agrees to Buy Carlson Hotels," Reuters, April 27, 2016, <u>https://www.reuters.com/article/business/chinas-hna-group-agrees-to-buy-carlson-hotels-idUSKCN0XP010</u>.

⁸⁷ "Jin Jiang Buys Radisson," S&P Global, November 8, 2018, <u>https://archive.ph/aXgTZ</u>; "HNA Sells Radisson Holdings to Jin Jiang-Led Consortium," Reuters, December 20, 2018, <u>https://www.reu</u> <u>ters.com/article/us-hna-radisson-hotel-sale/hna-sells-radissonholdings-to-jin-jiang-led-consortium-idUSKBN1KV0U7</u>; and "Radisson Hospitality Inc. Issues Statement Following Completion of Acquisition by Jin Jiang International Holdings Co., Ltd.," Radisson Hotel Group, January 19, 2019, <u>https://web.archive.org/web/20190119121245/</u> https://www.radissonhotelgroup.com/media_press-releases%26 article%3Dradisson-hospitality-inc-issues-statement-followingcompletion-of-acquisition-by-jin-jiang-international-holdings-co-ltd.

⁸⁸ UHRP did not include the Radisson Blu Kashgar in the current analysis given that Radisson is wholly owned by Jin Jiang, although Radisson Hotel Group continues to bear responsibility for its brand in Kashgar.

Hotels Group (now H World Group Limited, or "H World").⁸⁹ H World has benefitted from training and labor provided under "Xinjiang Aid," a government labor transfer program identified by experts as a highrisk indicator of Uyghur forced labor.⁹⁰ The alliance designated H World (then Huazhu) as Accor's exclusive master-franchisee for the operation and development of five of Accor's brands—Grand Mercure, Novotel, Mercure, ibis Styles, and ibis—in China and Mongolia.⁹¹ Of which, Grand Mercure, Mercure, and ibis are present in the Uyghur Region.

The alliance also entailed mutual investments with Accor and H World (then Huazhu) entering a crossshareholding relationship, further deepening their cooperation.⁹² However, in January 2023, Accor sold its remaining shares in H World,⁹³ and in March 2023, H World divested its ownership stake in Accor.⁹⁴ Although Accor and H World have ended crossshareholding, the two companies maintain a strategic business relationship aiming to expand the hospitality market and develop Accor brands in China.⁹⁵ As of March 2023, the partnership included more than 470 hotels in operation and another 120 hotels planned or under construction. 96

Accor's strategic partner in China, H World, has sourced labor and training for its hotels through Xinjiang Aid programs, which operate under a framework of coercion, surveillance, and ideological transformation, amounting to a forced labor program under international law.⁹⁷ The Xinjiang Aid program encourages governments and companies in other parts of China to either invest in factories, industrial parks, or other commercial entities in the Uyghur Region or recruit Uyghur or other Turkic workers from the region to work in factories in other parts of China.⁹⁸ Chinese companies receive government subsidies by opening factories inside the Uyghur Region or hiring Uyghur workers for their factories outside the Uyghur Region.⁹⁹

The Saihu Tourism College at Bortala Vocational and Technical College, located in Bortala Mongolian Autonomous Prefecture, relies on Xinjiang Aid from Hubei Province in a partnership between the

⁸⁹ "Accor and Huazhu Hotels Group Sign Strategic Alliance for China, Taiwan, and Mongolia," Accor, December 14, 2014, <u>https://webzine-actionnaires.accor.com/12_2014/pdf/20141214_pr_accor_huazhu.pdf</u>.

⁹⁰ Xinjiang Aid is a Chinese government policy framed as a poverty alleviation program, but widely documented as a mechanism for forced labor, mass displacement, and ideological indoctrination targeting Uyghurs and other Turkic peoples in the Uyghur Region. See: "Human Trafficking," Congressional-Executive Commission on China 2021 Annual Report, March 21, 2022, www.cecc.gov/sites/evosubsites/cecc.house.gov/files/documents/2021%20AR%20Human%20Tr afficking.pdf; see also: Adrian Zenz, "Coercive Labor and Forced Displacement in Xinjiang's Cross-Regional Labor Transfer Program," March 2021, Jamestown Foundation, https://jamestown.org/product /coercive-labor-and-forced-displacement-in-xinjiangs-cross-regionallabor-transfer-program.

⁹¹ "Accor and Huazhu Hotels Group Sign Strategic Alliance for China, Taiwan, and Mongolia," December 14, 2014, <u>https://webzine-</u> actionnaires.accor.com/12 2014/pdf/20141214 pr accor huazhu.pdf.

⁹² "AccorHotels Completes Buy of 10.8% Stake in Huazhu," *MarketWatch*, January 27, 2016, <u>https://www.marketwatch.com/story</u> /accorhotels-completes-buy-of-108-stake-in-huazhu-2016-01-27; and "AccorHotels and Huazhu finalize their strategic alliance," Accor Group, January 14, 2016, <u>https://group.accor.com/api/accorhotels</u> /<u>PressRelease/GetFile/?id=%7B54D82AEC-4D35-42B2-80FE-E25205F32CDB%7D</u>.

⁹³ "Disposal of 3.3% in H World Group Limited for a Total Amount of USD 460M," January 18, 2023, <u>https://group.accor.com</u>.

⁹⁴ "H World Group Limited Reports Fourth Quarter and Full Year 2022 Financial Results," H World Group Investor Relations, March 28, 2023, <u>https://ir.hworld.com/news-releases/news-release-details/h-world-group-limited-reports-fourth-quarter-and-full-year-2022</u>.

 ⁹⁵ "Accor and H World Group Continue to Lead Hospitality Development Across China," Accor, January 18, 2023, <u>https://press.accor.com/greater-china/accor-and-h-world-groupcontinue-to-lead-hospitality-development-across-china</u>.
 ⁹⁶ Ibid.

⁹⁷ Adrian Zenz, "Coercive Labor and Forced Displacement in Xinjiang's Cross-Regional Labor Transfer Program," Jamestown Foundation, March 2021, <u>https://jamestown.org/product/coercive-labor-and-forceddisplacement-in-xinjiangs-cross-regional-labor-transfer-program.</u>

⁹⁸ Adrian Zenz, "Beyond the Camps: Beijing's Long-Term Scheme of Coercive Labor, Poverty Alleviation and Social Control in Xinjiang," *Journal of Political Risk*, 7, no. 12 (2019), <u>https://www.jpolrisk.com/ beyond-the-camps-beijings-long-term-scheme-of-coercive-laborpoverty-alleviation-and-social-control-in-xinjiang</u>.

⁹⁹ "Against Their Will: The Situation in Xinjiang," US Department of Labor, 2024, <u>https://www.dol.gov/agencies/ilab/against-their-will-the-situation-in-xinjiang</u>.



Image 5: Participants at the May 2017 "Hundred Project" symposium held at Ürümchi Vocational University. <u>Source</u>: Urumqi Municipal Government Website.

education sector and the tourism industry.¹⁰⁰ Since it started in 2021, Saihu Tourism College has signed cooperation agreements with numerous commercial enterprises in the tourism and hospitality sector, including H World, for order-based training and employment.¹⁰¹ Order-based training (订单式培训) refers to a system in which employers submit employment details—such as job types, number of positions, and technical requirements—to local labor departments and vocational training facilities.¹⁰² H World has benefitted from Xinjiang Aid through its cooperation with Qiao Jun, an employee of Shandong Commercial Vocational and Technical College in eastern China, who transferred to Kashgar Vocational and Technical College in September 2021. While he was posted in Kashgar, Qiao established the "Huazhu Group Store Manager Order Class," under the Xinjiang Aid program, to provide training and labor for H World's operations in mainland China.¹⁰³

As such, H World is the direct beneficiary of forced labor programs under Xinjiang Aid. Accor's long-term strategic relationship with a company exposed to the coerced labor of Uyghurs is problematic given H World's role in "growing multiple Accor brands in the Chinese market" under the partnership agreement.¹⁰⁴

(ii) Labor Transfer Programs

The Chinese government has placed millions of Uyghurs and other Turkic peoples in the Uyghur Region into "poverty alleviation," "surplus labour," and "labour transfer" programs.¹⁰⁵ Researchers and experts have concluded that these initiatives amount to mechanisms of a massive program of forced labor, and are deeply intertwined with state-led strategies of control, assimilation, and securitization.¹⁰⁶

¹⁰⁰ "援疆风采 吕煜文: 真情奉献青色草原 [Aid-Xinjiang Style, Lü Yuwen: Sincerely dedicated to the green grassland]," 微信 [Weixin], October 6, 2023, <u>https://archive.ph/LWrnA</u>.

¹⁰¹ Ibid.

¹⁰² "贫困退出背景下南疆深度贫困地区防返贫机制研究 [Research on the prevention of poverty relapse in the deep poverty-stricken areas of southern Xinjiang in the context of poverty exit mechanisms]," 记录小 康工程 [Recording the Xiaokang Project], n.d., <u>https://xjxk.xjmty.com/jl</u> xkgc/c100031/202012/2ca5e4dc2bd44d50af31cb70768bfe65/files/16266 68334488_91580.pdf.

¹⁰³ "山东援疆教师风采 乔骏:用党建'红心'引领'匠心'为受援地培养新时代'新工匠' [Shandong Teachers' Xinjiang-Aid Style - Qiao Jun: Use the 'red heart' of party building to lead 'craftsmanship' and cultivate 'new craftsmen' in the new era for the aided areas],"山东援疆 [Shandong Xinjiang Aid], September 5, 2022, <u>https://archive.ph/DTwOx</u>.

¹⁰⁴ "Accor and H World Group Continue to Lead Hospitality Development Across China," Accor, January 18, 2023,

https://press.accor.com/greater-china/accor-and-h-world-groupcontinue-to-lead-hospitality-development-across-china.

¹⁰⁵ Adrian Zenz, "Beyond the Camps: Beijing's Long-Term Scheme of Coercive Labor, Poverty Alleviation and Social Control in Xinjiang," *Journal of Political Risk*, 7, no. 12 (2019), <u>https://www.jpolrisk.com/</u> <u>beyond-the-camps-beijings-long-term-scheme-of-coercive-labor-</u> <u>poverty-alleviation-and-social-control-in-xinjiang</u>.

¹⁰⁶ Adrian Zenz, "The Conceptual Evolution of Poverty Alleviation through Labor Transfer in the Xinjiang Uyghur Autonomous Region," *Central Asian Survey*, 2023, <u>https://ssrn.com/abstract=4612801</u>; Laura Murphy, Forced Labour Lab, Sheffield Hallam Helena Kennedy Centre, Forced Labor in the Uyghur Region: The Evidence, Sheffield Hallam Helena Kennedy Centre, <u>https://www.shu.ac.uk/helena-kennedycentre-international-justice/research-and-projects/all-</u>

projects/evidence-briefs; and Amy Lehr and Mariefaye Bechrakis, "Connecting the dots in Xinjiang," Center for Strategic and International Studies, October 16, 2019, <u>https://www.csis.org/</u> analysis/connecting-dots-xinjiang-forced-labor-forced-assimilationand-western-supply-chains.

A significant aspect of China's "poverty alleviation" efforts in the region involves relocating individuals from internment camps, as well as compelling rural inhabitants to participate in labor within state-run agricultural and industrial sectors.¹⁰⁷ The Xinjiang government's 14th Five-Year Plan for Employment Promotion (2021–25) stipulates "that not just one person per household but 'every single person who is able to work is to realize employment.'"¹⁰⁸

As documented by researcher Adrian Zenz, "labor transfers reached a record 3.17 million persontimes in 2021 before leveling off at above 3 million in 2022."¹⁰⁹ In 2023, transfers "exceeded those from the previous year and surpassed state-mandated quotas."¹¹⁰ Zenz noted that "[r]esistance to poverty alleviation and wage labor is akin to resistance to modernization, which in turn is a sign of extremism. Refusing to cooperate with this scheme is likely reason enough to be sent to a re-education facility."¹¹¹

Labor transfer schemes are interwoven with the tourism industry in East Turkistan.¹¹² On November 15, 2018, 10 regional tourism companies signed assistance agreements with 10 villages to promote the development of rural tourism, noting "we will promote the targeted poverty alleviation action of '100 Enterprises Helping 100 Villages' to ensure that assistance activities achieve effective results."¹¹³ In January 2019, at a Xinjiang Tourism Association



Image 6: Participants at the May 2017 "Hundred Project" symposium held at Ürümchi Vocational University listen to Yu Huan (fifth from left in the row facing participants), Secretary of the Party Leadership Group of the Autonomous Region Tourism Development Committee. <u>Source</u>: Ürümchi Municipal Government Website.

awards ceremony, these 10 companies were praised for their role in poverty alleviation efforts.¹¹⁴

Sun Li, the Human Resources Director of the Grand Mercure Urumqi Hualing hotel, announced at a publicity event in May 2017 that the hotel signed employment agreements with several students from the 110 who participated in a training symposium called the Hundred Project (百名工程),¹¹⁵ held at the Ürümchi Vocational Training University (乌鲁木齐职业

¹¹³ Ibid.

¹⁰⁷ "Uyghurs for Sale: 'Re-education', Forced Labour and Surveillance Beyond Xinjiang," Australian Strategic Policy Institute, March 2020, <u>https://www.aspi.org.au/report/uyghurs-sale</u>.

 ¹⁰⁸ Adrian Zenz, "The Conceptual Evolution of Poverty Alleviation through Labor Transfer in the Xinjiang Uyghur Autonomous Region," *Central Asian Survey*, 2023, <u>https://ssrn.com/abstract=4612801</u>.
 ¹⁰⁹ Ibid.

¹¹⁰ Adrian Zenz, "Forced Labor in the Xinjiang Uyghur Autonomous Region: Assessing the Continuation of Coercive Labor Transfers in 2023 and Early 2024," *China Brief*, 24, no. 5 (2024), <u>https://jamestown.org/</u> <u>program/forced-labor-in-the-xinjiang-uyghur-autonomous-regionassessing-the-continuation-of-coercive-labor-transfers-in-2023-andearly-2024</u>.

¹¹¹ Adrian Zenz, "Beyond the Camps: Beijing's Long-Term Scheme of Coercive Labor, Poverty Alleviation and Social Control in Xinjiang," *Journal of Political Risk*, 7, no. 12 (2019), <u>https://www.jpolrisk.com</u>

[/]beyond-the-camps-beijings-long-term-scheme-of-coercive-laborpoverty-alleviation-and-social-control-in-xinjiang.

¹¹² "阿克苏地区10家旅游企业结对帮扶10个贫困村 [10 tourism enterprises in Aksu Prefecture paired up to help 10 impoverished villages]," 天山网 [Tianshan Net], November 20, 2018, <u>https://archive.ph/b6lpi</u>.

¹¹⁴ "文旅融合大发展 2018年全疆旅游业热点评选结果出炉 [The results of the selection of hot spots in Xinjiang's tourism industry in 2018 are released]," 新疆旅游协会 [Xinjiang Tourism Association], January 25, 2019, <u>https://archive.ph/Tw7iw</u>.

¹¹⁵ Formally known as the "Xinjiang Tourism Poverty Alleviation Training and Employment Project for Ten Thousand People 2017 -Hundreds of Ethnic Minority Youth Tourism Training and Employment Action." See: "于欢:像介绍自己的家一样介绍家乡 [Yu Huan: Introducing my hometown like my own home],"晨报旅游 [Morning Travel News], May 11, 2017, <u>https://archive.ph/LssUt</u>.

大学).¹¹⁶ An article posted to the Ürümchi Municipal Government website claimed the symposium would help meet demand for workers in the tourism sector by providing "order-based" training of "ethnic minority" youths in the four prefectures of southern East Turkistan.¹¹⁷ The Hundred Project focuses on unemployed "ethnic minority" high school graduates from Kashgar, Khotan, Kezhou, and Qizilsu, as well as labor from poor families, and "surplus rural labor" from these prefectures, strongly indicating a high risk of forced labor.¹¹⁸

Labor transfer schemes are interwoven with the tourism industry in East Turkistan.

Yu Huan, the Secretary of the Party Leadership Group of the Autonomous Region Tourism Development Committee (新疆维吾尔自治区旅游发展委员会), explained that "order-based" training means students can be directly "employed" after training.¹¹⁹ Yu added that the Hundred Project was undertaken as part of the central government's "Xinjiang governance strategy," adding "young students should be grateful to the party and the motherland from the bottom of their hearts, ...and cultivate their responsibility to society and loyalty to the country."¹²⁰

¹¹⁹ "于欢:像介绍自己的家一样介绍家乡 [Yu Huan: Introducing my hometown like my own home]," 晨报旅游 [Morning Travel News], May 11, 2017, <u>https://archive.ph/LssUt</u>.

¹²⁰ Ibid.

Seen against a backdrop of extra-judicial mass internment and other pervasive human rights abuses, refusal to participate in labor transfer and poverty alleviation programs is treated as a sign of religious extremism, which is punishable by internment or imprisonment.¹²¹ As such, the Hundred Project amounts to a forced labor program, from which Accor's Grand Mercure Ürümchi Hualing has benefited.¹²²

In addition to connections with the Hundred Project, the parent company of Xinjiang Hualing Hotel Co., Ltd. (新疆华凌大饭店有限责任公司)—the management company which appears to manage the Grand Mercure Ürümchi Hualing—is Xinjiang Hualing Industry & Trade (Group) Co., Ltd. (新疆华凌工贸(集团)有限公 司) (Hualing Group). In June 2017, Hualing Group received 160 "surplus minority laborers" from Kashgar and Hotan as part of a government-organized "poverty alleviation" program aimed at "promoting regional stability."¹²³

(iii) Promotion of State Propaganda

Hilton Hotels in East Turkistan has hosted Chinese state propaganda events that erase Uyghur identity in the region.¹²⁴ For example on July 25, 2023, the Hilton Urumqi was the venue for a press conference sponsored by the XUAR Department of Culture and Tourism to promote a songwriting and performance

¹¹⁶ "南疆四地州百名少数民族青年旅游就业技能培训初结硕果 [The tourism employment skills training for 100 ethnic minority youths in the four prefectures of southern Xinjiang has yielded initial results]," 乌 鲁木齐市政府网站 [Ürümchi Municipal Government Website], May 12, 2017, <u>https://archive.ph/zz5VO</u>.

¹¹⁷ Ibid.

¹¹⁸ "新疆启动2017百名少数民族青年旅游培训就业行动 [Xinjiang launches 2017 tourism training and employment campaign for 100 ethnic minority youth],"中国日报网 [China Daily], February 26, 2017, <u>https://archive.ph/59gCo</u>.

 ¹²¹ "Employment and Labor Rights in Xinjiang," The State Council Information Office of the People's Republic of China, September 17, 2020, Section I, Para. 1, <u>https://english.www.gov.cn/archive</u> /whitepaper/202009/17/content_WS5f62cef6c6d0f7257693c192.html;

see also: "新疆局地组织民众识别75种宗教极端活动 [Local authorities in Xinjiang organize people to identify 75 types of religious extremist activities]," Sina, December 24, 2014, <u>https://archive.ph/V9hhA</u>. ¹²² "于欢:像介绍自己的家一样介绍家乡 [Yu Huan: Introducing my hometown like my own home]," 晨报旅游 [Morning Travel News], May 11, 2017, <u>https://archive.ph/LssUt</u>, and "南疆四地州百名少数民族青年旅 游就业技能培训初结硕果 [The tourism employment skills training for 100 ethnic minority youths in the four prefectures of southern Xinjiang has yielded initial results]," 乌鲁木齐市政府网站 [Ürümchi Municipality Government Website], May 12, 2017, <u>https://archive.ph/zz5VO</u>.

¹²³ "首批喀什和田地区富余劳 动力入职非公企业 [The first batch of surplus laborers in Kashgar and Hotan regions were employed by non-public enterprises]," 中央人民广播电台 [China National Radio], June 23, 2017, <u>https://archive.ph/DbGIE</u>.

¹²⁴ "这里是新疆'大型原创歌曲演唱会新闻发布会在乌鲁木齐举办 ['This is Xinjiang' large-scale original song concert press conference held in Urümchi]," 新疆好地方 [Xinjiang is a Good Place], July 26, 2023, <u>https://archive.ph/QhzcT</u>.

concert.¹²⁵ The event was heavily propagandized, and despite the concert theme of "This is Xinjiang," all the signage in the photographs was in Chinese.¹²⁶

By operating in the region, hotels platform tourist sites that erase the identity of Uyghurs and unintentionally become facilitators of cultural and historical loss.

Furthermore, ties between Chinese state officials and Hilton were in evidence at a 2017 Ürümchi meeting of the Hilton Hotels Group China Region Owners Association, which represents Hilton franchisees.¹²⁷ Cao Zhixin, Director of the XUAR Tourism Development Committee's Xinjiang Aid Office, a program linked to labor transfers as discussed above, attended the 2017 gathering at the invitation of the association.¹²⁸

UHRP has frequently raised the problematic nature of promoting tourism in East Turkistan amid crimes against humanity.¹²⁹ In a January 2024 report on international travel companies operating in the region, UHRP wrote that these companies "are not only facilitating visits to these destinations, but also

128 Ibid.

¹²⁹ Henryk Szadziewski, "Genocide Tours: International Travel Companies in East Turkistan," UHRP, August 30, 2023, <u>https://uhrp.org/report/genocide-tours-international-travel-</u> <u>companies-in-east-turkistan</u> and Henryk Szadziewski, "Genocide Tours: European Travel Companies in East Turkistan," UHRP, January 17, 2024, <u>https://uhrp.org/report/genocide-tours-european-travel-</u> <u>companies-in-east-turkistan</u>. perpetuating Chinese government narratives that revise Uyghur culture, identity, and traditions."¹³⁰

In promotional material, hotels under review promote tourist sites that depict a state version of Uyghur identity. For example, the Holiday Inn Express Urumqi Station lists the Xinjiang Regional Museum as a nearby attraction. The museum is a repository of state erasures of Uyghur history, culture, and identity, and scholar Anna Hayes notes that "the non-Han nationalities of Xinjiang continue to be marginalized within the official regional narrative contained within the Xinjiang Regional Museum." By operating in the region, hotels platform tourist sites that erase the identity of Uyghurs and unintentionally become facilitators of cultural and historical loss.

VI. Standards of Business Practice

International hotel chains have voluntarily agreed to human rights standards at the corporate and international levels. The five international hotel chains under review have made numerous valuesdriven public commitments through corporate social responsibility statements posted to their websites.¹³¹ Further, Accor, Hilton, IHG, Marriott, and Wyndham have human rights policies.¹³² The human rights

¹³² "Human Rights Policy," Accor, accesses on March 24, 2025, www.group.accor.com/-/media/Corporate/Group/PDF-forpages/Human-Right/Accor_HUMAN_RIGHTS_POLICY_EN_Sept-2023.pdf; "Human Rights Principles," Hilton, accessed on March 24, 2025, ir.hilton.com/~/media/Files/H/Hilton-Worldwide-IR-V3/committee-composition/hilton-human-rights-principles-2019.pdf; "IHG Human Rights Policy," InterContinental Hotels Group, 2023, www.ihgplc.com/~/media/Files/I/Ihg-Plc/responsible-business/policydocuments/english/en-ihg-human-rights-policy-september-2019.pdf; "Marriott International Inc. Human Rights Policy Statement," Marriott International, July 2017, www.marriott.com/marriottassets/Multimedia /PDF/Corporate/HumanRightsStatement.pdf; and "Human Rights

¹²⁵ Ibid.

¹²⁶ Ibid.

¹²⁷ "希尔顿酒店集团中国区酒店业主协会换届 [Hilton Hotels Group China Hotel Owners Association Renewal]," Maidian.com, June 20, 2017, <u>https://archive.ph/TT5he</u>.

¹³⁰ Henryk Szadziewski, "Genocide Tours: European Travel Companies in East Turkistan," UHRP, January 17, 2024, <u>https://uhrp.org/report/</u> <u>genocide-tours-european-travel-companies-in-east-turkistan</u>.

¹³¹ "Environment & CSR," Accor, accessed on March 24, 2025, group.accor.com/en/hotel-development/Optimise-your-

costs/Environment-and-CSR; "Travel with Purpose," Hilton, accessed on March 24, 2025, https://esg.hilton.com/; "Responsible Business," InterContinental Hotels Group, accessed on March 24, 2025, www.ihgplc.com/responsible-business; "Serve 360," Marriott International, accessed on March 24, 2025, serve 360, marriott.com; and "Committed to Doing What's Right," Wyndham Hotels & Resorts, accessed on March 24, 2025, www.corporate.wyndhamhotels.com /social-responsibility.

commitments of IHG and Wyndham do not reference forced labor; however, Accor, Hilton, and Marriott mention the prohibition of forced labor in particular.¹³³ For example, Accor states the company "rejects all forms of forced labor," and "ensures that the recruitment agencies and intermediaries it uses never engage in practices that may lead to forced or compulsory labor."¹³⁴

The international hotel chains under review draw their human rights policies from a series of key international human rights instruments, including the Universal Declaration of Human Rights (UDHR) (Hilton, IHG, Marriott), the International Covenant on Civil and Political Rights (ICCPR) (IHG), the International Covenant on Economic, Social and Cultural Rights (ICESCR) (IHG), the United Nations Guiding Principles on Business and Human Rights (Accor, IHG, Wyndham), the International Labour Organization's (ILO) Fundamental Conventions (IHG, Wyndham), and the OECD Guidelines for Multinational Enterprises (Accor, IHG).¹³⁵ Accor and IHG are are both active participants in the United Nations Global Compact, a voluntary initiative that encourages businesses worldwide to adopt sustainable and socially responsible policies aligned with ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption.¹³⁶

Table 3: International Hotel Chains'	
Human Rights Commitments	

Universal Declaration of Human Rights (UDHR)	Hilton, IHG, Marriott
International Covenant on Civil and Political Rights (ICCPR)	IHG
International Covenant on Economic, Social and Cultural Rights (ICESCR)	IHG
United Nations Guiding Principles on Business and Human Rights	Accor, IHG, Wyndham
International Labour Organization's (ILO) Fundamental Conventions	IHG, Wyndham
OECD Guidelines for Multinational Enterprises	Accor, IHG
UN Global Compact (members)	Accor, IHG

International human rights standards outlined in these documents contain provisions on protection against forced labor, for example:

Everyone has the right to work, to free choice of employment, to just and favourable conditions

social-and-cultural-rights; "Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' framework," United Nations Office of the High Commissioner for Human Rights, 2011, <u>https://www.ohchr.org/sites/default/files/</u> <u>Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf;</u> "Conventions, Protocols and Recommendations," International Labour Organization, accessed on March 24, 2025, <u>https://www.ilo.org/global/</u> <u>standards/introduction-to-international-labour-standards/conventions</u> <u>-and-recommendations/lang--en/index.htm;</u> and "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct," Organization for Economic Cooperation and Development, 2023, <u>https://read.oecd-ilibrary.org/finance-and-investment/oecd-</u> guidelines-for-multinational-enterprises-on-responsible-businessconduct_81f92357-en.

Policy Statement," Wyndham Hotels & Resorts, September 2020, www.corporate.wyndhamhotels.com/wp-content/uploads/2020/10/Hu man_Rights_Policy_Statement_FINAL_09302020.pdf. ¹³³ Ibid.

¹³⁴ "Human Rights Policy," Accor, accessed on March 24, 2025, www.group.accor.com/-/media/Corporate/Group/PDF-forpages/Human-Right/Accor_HUMAN_RIGHTS_POLICY_EN_Sept-2023.pdf.

¹³⁵ "Universal Declaration of Human Rights," United Nations, accessed on March 24, 2025, <u>www.un.org/en/about-us/universal-declaration-of-human-rights</u>; "International Covenant on Civil and Political Rights," United Nations Office of the High Commissioner for Human Rights, accessed on March 24, 2025, <u>www.ohchr.org/en/instruments-</u> <u>mechanisms/instruments/international-covenant-civil-and-politicalrights</u>; "International Covenant on Economic, Social and Cultural Rights," United Nations Office of the High Commissioner for Human Rights, accessed on March 24, 2025, <u>https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-</u>

¹³⁶ United Nations Global Compact. "AccorHotels." Last modified July
31, 2024. <u>https://unglobalcompact.org/what-is-gc/participants/125</u>.
"InterContinental Hotels Group." Last modified July 11, 2023.
<u>https://unglobalcompact.org/what-is-gc/participants/5352</u>.

of work and to protection against unemployment. (Article 23.1, UDHR).¹³⁷

No one shall be required to perform forced or compulsory labour. (Article 8.3(a), ICCPR).¹³⁸

Each Member shall ensure that all victims of forced or compulsory labour, irrespective of their presence or legal status in the national territory, have access to appropriate and effective remedies, such as compensation. (Article 4.1, ILO Protocol of 2014 to the Forced Labour Convention, 1930).¹³⁹

While these hotel chains claim to uphold human rights standards and commit to addressing forced labor, these commitments lack rigorous enforcement mechanisms. Accor-branded hotels have participated in, or are linked to, policies of state-sponsored forced labor, such as Xinjiang Aid and labor transfer programs, and as such, there are strong indications that Accor is in violation of its own policies. Further, international hotel chains should disclose how they are *not* benefitting from or participating in such programs. As publicly traded companies, these disclosures would be relevant information for shareholders as well as other stakeholders.

International hotel chains operating in a region marked by ongoing crimes against humanity and genocide have a clear responsibility to uphold human rights and ethical standards.¹⁴⁰ In light of this responsibility, the UN Guiding Principles on Business and Human Rights (UNGPs)—which sets out an authoritative global framework for preventing and addressing adverse human rights impacts linked to business activity—considers the question of whether businesses should remain or exit an environment where there may be pervasive human rights abuses occurring.¹⁴¹ While the UNGPs generally favor staying and using leverage to promote change, disengagement is advised when human rights violations cannot be mitigated. Commentary to the UNGPs notes that in situations where an enterprise lacks leverage to prevent or mitigate rights abuses, it should, "consider ending the relationship, taking into account credible assessments of potential adverse human rights impacts of doing so."¹⁴²

Because effective human rights and labor rights due diligence remains impossible in the Uyghur Region, the only responsible business decision is immediate exit.

In August 2023, the Office of the United Nations High Commissioner for Human Rights (OHCHR) published a document, grounded in the UNGPs titled, *Business and Human Rights in Challenging Contexts: Considerations for Remaining and Exiting*, examining how enterprises should think about these questions.¹⁴³ The document refers to the need for "heightened human rights due diligence" that companies should follow when operating in or investing in "conflict-affected areas," but this framework falls short of addressing a situation like the challenge in the Uyghur Region, which is state-imposed forced labor on a massive scale.

¹³⁷ "Universal Declaration of Human Rights," United Nations, accessed on March 24, 2025, <u>https://www.un.org/en/about-us/universal-</u> <u>declaration-of-human-rights</u>.

¹³⁸ "International Covenant on Civil and Political Rights," United Nations, 1966, United Nations Treaty Series, vol. 999, p. 171, <u>https://www.ohchr.org/en/instruments-mechanisms/instrument</u> <u>s/international-covenant-civil-and-political-rights</u>.

 ¹³⁹ "Protocol of 2014 to the Forced Labour Convention, 1930,"
 International Labour Organization, adopted June 11, 2014, <u>https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::</u> P12100_ILO_CODE:P029.

 ¹⁴⁰ "Determination of the Secretary of State on Atrocities in Xinjiang,"
 US Department of State, January 19, 2021, <u>https://2017-</u>

<u>2021.state.gov/determination-of-the-secretary-of-state-on-atrocities-</u> <u>in-xinjiang/index.html</u>.

¹⁴¹ "Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' framework," United Nations Office of the High Commissioner for Human Rights, 2011, <u>https://www.ohchr.org/sites/default/files/Documents/Publications/Guid</u> <u>ingPrinciplesBusinessHR_EN.pdf</u>.

¹⁴² Ibid.

¹⁴³ "Business and Human Rights in Challenging Contexts: Considerations for Remaining and Exiting," Office of the United Nations High Commissioner for Human Rights, August 1, 2023, https://www.ohchr.org/en/documents/tools-and-resources/businessand-human-rights-challenging-contexts-considerations.

Because effective human rights and labor rights due diligence remains impossible in the Uyghur Region, the only responsible business decision is immediate exit.¹⁴⁴ Reengagement should be considered only when the government has ended its persecution and when due diligence is possible. In doing so, companies should follow OHCHR recommendations to: "[clarify] the potential conditions under which reengagement would be possible to create incentives for positive change" and "[Use] public communication about the decision and reasons for it as a means of increasing leverage."¹⁴⁵

The OHCHR guidance states that "Although the UNGPs stipulate that businesses should seek to exercise leverage where they are contributing or linked to such harms, it may be the case that business enterprises have little if any leverage with governments involved in carrying out egregious violations. Where sufficient leverage is lacking, those enterprises that are at risk of being involved in gross human rights abuses will need to rapidly come to a decision about [disengagement]."¹⁴⁶

Additionally, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct notes that when it is not feasible to assess or mitigate human rights risk—particularly in situations involving severe adverse impacts—responsible disengagement is not only justified, but required.¹⁴⁷ In such cases, companies should prioritize exiting business relationships.¹⁴⁸ International hotel chains have the same responsibilities as all other businesses in ending complicity. The Coalition to End Forced Labour in the Uyghur Region, endorsed by 450+ groups around the world, calls on all businesses to exit the Uyghur Region entirely. This includes ending all operations and business relationships in the region itself, noting that: "Amidst the horror unfolding in the Uyghur Region, the only way corporations can ensure they are not unwittingly bolstering the government's repression is, therefore, to fully extricate their supply chains from the Uyghur Region."¹⁴⁹

VII. Recommendations

Any ongoing engagement in the Uyghur Region by the international tourism industry normalises atrocity crimes. Tourism companies' failure to disengage from the region in light of this therefore risks actively contributing to the ongoing harm. This is due to the purposeful actions by the Chinese government to leverage tourism to the Uyghur Region as a means of normalizing persecution.¹⁵⁰ As such:

To International Hotel Chains:

• Immediately Freeze Hotel Expansion in the Uyghur Region. International hotel chains should not proceed with planning, development, construction, or marketing in a region where genocide and crimes against humanity are ongoing.

¹⁴⁴ Eva Xiao, "Auditors to Stop Inspecting Factories in China's Xinjiang Despite Forced-Labor Concerns," *Wall Street Journal*, September 21, 2020, <u>https://www.wsj.com/articles/auditors-say-they-no-longer-willinspect-labor-conditions-at-xinjiang-factories-11600697706</u>; see also: "Factories and Fraud in the PRC: How Human Rights Violations Make Reliable Audits Impossible," Congressional Executive Commission on China, April 30, 2024, <u>https://www.govinfo.gov/content/pkg/CHRG-118jhrg55563/pdf/CHRG-118jhrg55563.pdf</u>.

¹⁴⁵ Ibid.

¹⁴⁶ Ibid.

¹⁴⁷ The OECD Guidelines for Multinational Enterprises are recognized by all 38 OECD member states, including the US (Hilton, Hyatt, Marriott, Wyndham), the UK (IHG), and France (Accor).

¹⁴⁸ "OECD Guidelines for Multinational Enterprises on Responsible Business Conduct," Organisation for Economic Cooperation and Development, June 8, 2023, <u>www.oecd.org/en/publications/oecd-</u> <u>guidelines-for-multinational-enterprises-on-responsible-business-</u> <u>conduct_81f92357-en.html</u>.

¹⁴⁹ "Call to Action: June 2022 Interim Update," End Uyghur Forced Labor, June 2022, <u>https://enduyghurforcedlabour.org/call-to-action</u>.

¹⁵⁰ Henryk Szadziewski, "Genocide Tours: International Travel Companies in East Turkistan," UHRP, August 30, 2023, <u>https://uhrp.org/report/genocide-tours-international-travel-</u> <u>companies-in-east-turkistan</u>; and Henryk Szadziewski, "Genocide Tours: European Travel Companies in East Turkistan," UHRP, Janaury 17, 2024, <u>https://uhrp.org/report/genocide-tours-european-travel-</u> <u>companies-in-east-turkistan</u>.

- End All Operations and Business Relationships in the Uyghur Region. International hotel chains should immediately disengage from the Uyghur Region, including closing franchise agreements, terminating management contracts, and severing any direct or indirect business relationships.
- Publicly Disclose Decision to Exit the Uyghur Region. Hotels should provide clear reasoning and a timeline for withdrawal, in line with the UN Guiding Principles on Business and Human Rights (UNGPs).
- Ensure Transparency and Accountability in Supply Chains and Business Relationships. Conduct and publish heightened human rights due diligence to determine whether any suppliers, contractors, or business partners are linked to state-imposed forced labor, labor transfers, or other abusive programs. Disclose any payments, taxes, or fees that directly or indirectly support entities involved in human rights abuses, including the Xinjiang Production and Construction Corps (XPCC).
- Engage with Uyghur Rights Organizations and Survivors. Consult directly with Uyghur civil society, labor rights organizations, and survivors to shape responsible corporate policies. Respond meaningfully to advocacy efforts and recommendations from independent human rights experts. Engage with Uyghur rights organizations on options for remediations to the affected community via the Coalition to End Forced Labour in the Uyghur Region.¹⁵¹

To Third-party Booking Websites:

• Remove All Hotel Listings Located in the Uyghur Region. Upon removal, conduct and publish heightened human rights due diligence in relation to prior listings in the Uyghur Region.

To the US, UK, and French Governments:

Investigate International Hotel Chains
 Operating in XPCC-administered Areas for
 Sanctions Violations. The US government should
 call on Hilton and Wyndham to immediately cease
 operations in XPCC-administered areas of the
 Uyghur Region, and require transparency
 regarding commercial ties between hotels and the
 XPCC. The UK and French governments should
 take the same steps in relation to IHG and Accor,
 respectively.

To the US, Dutch, and German Governments:

• Investigate Third-party Booking Platforms Profiting from Listings in the Uyghur Region for Sanctions Violations. The US government should investigate Tripadvisor, Priceline, Kayak, Expedia.com, Hotels.com, Orbitz, and Travelocity for listing hotels on territory administered by the XPCC, an entity sanctioned by the US government for serious human rights abuses. The Dutch and German governments should investigate Booking.com and Trivago, respectively, for listing hotels on territory administered by the XPCC, an entity sanctioned by the European Union for serious human rights abuses.

¹⁵¹ See, for example, "Remediation and Uyghur forced labour" in "Respecting Rights in Renewable Energy," AntiSlavery International, Sheffield Hallam University (Helena Kennedy Center for International Justice), and Investor Alliance for Human Rights, January 2024,

https://www.ant_islavery.org/wp-content/uploads/2024/01/ASI-HCII-IAHR-Investor-Guidance.pdf.

VIII. Appendices

Appendix I. Authors' Communications with International Hotel Chains

On January 14, 2025, the authors sent emails to Accor S.A., Inc., Hilton Hotels & Resorts, InterContinental Hotels Group, Marriott International Inc., and Wyndham Hotels & Resorts Inc. informing them that their company had been named in a forthcoming report. The email addresses of the international hotel chains are all publicly listed. We received no responses. On February 7, 2025, the authors sent a follow-up email to the same five companies. We received no responses to our communications.

Tab	Table 4: Future Hotel Openings in East Turkistan (Outside UHRP's Analysis)							
Hotel Chain	Hotel Brand	Hotel in East Turkistan	Projected Opening	Additional Notes				
Accor (France)	Mövenpick	Mövenpick by Accor Kashgar ¹⁵²	2025	Accor signed a strategic partnership agreement with Sunmei Digital Intelligence Group in July 2022; Sunmei is listed as the project developer for this hotel. ¹⁵³				
	Home? Suites	<u>Home2 Suites By Hilton</u> <u>Xinjiang Yining</u>	May 2025	43°55'13"N 81°16'29"E (approximate location)				
	Home2 Suites Hampton by Hilton	<u>Home2 Suites by Hilton</u> <u>Aksu Baicheng</u>	January 2026	41°48'07"N 81°50'18"E (approximate location)				
		<u>Hampton by Hilton</u> <u>Yining</u>	August 2025	43°56'26"N 81°17'14"E (approximate location)				
Hilton (USA)		<u>Hampton by Hilton</u> <u>Changji</u>	May 2025	44°01'06"N 87°17'45"E (approximate location)				
	Hilton Garden Inn	<u>Hilton Garden Inn</u> <u>Urumqi Railway Station</u>	November 2025	43°50'03"N 87°31'27"E				
		<u>Hilton Garden Inn Ili</u> <u>Yining</u>	May 2025	43°55'13"N 81°16'28"E (approximate location)				
		<u>Hilton Garden Inn</u> <u>Yangqi Downtown</u>	June 2025	42°03'32"N 86°33'37"E				
		N/A ¹⁵⁴	Contract stage	Located in Wenquan County.				
		Hilton Garden Inn	2025-Q2	Architect: Xinjiang Architectural Design and				

Appendix II. Future Hotel Openings

¹⁵² "Movenpick by Accor Kashgar," Top Hotel Projects (paywall), accessed on March 24, 2025, <u>https://app.tophotelprojects.com /constructions/42817</u>.

¹⁵³ "Accor and Sunmei Celebrate Mövenpick Hotel & Resorts' 50th Anniversary with Strong Development Momentum across China," Accor, March 27, 2024, <u>https://press.accor.com/greater-china/accor-and-sunmei-celebrate-movenpick-hotel-amp-resorts-50th-anniversary-with-strong-development-momentum-across-china/</u>.

¹⁵⁴ "多家高端旅游酒店将进驻新疆 签约总额超126亿元 [Many high-end tourist hotels to enter Xinjiang with a total contract value of over 12.6 billion yuan],"人民日报 [People's Daily], June 13, 2023, <u>http://xj.people.com.cn/n2/2023/0613/c186332-40455564.html</u>.

		Karamay ¹⁵⁵		Research Institute Co., Ltd.; Developer: Xinjiang Yunduo Hotel Real Estate Development Co., Ltd.; General Contractor: Xinjiang Sanlian Enterprise Development Group Co., Ltd.
	Conrad, Canopy, and Hilton (dual- branded)	Conrad Altay Hemu Ski Resort, Canopy by Hilton Altay Hemu Ski Resort, and Hilton Hemu Ski Resort (dual-branded) ¹⁵⁶	2026-Q4	Developer: Xinjiang Altay Tourism Development Group Co., Ltd.; General Contractor: Xinjiang Tairun Haohe Hotel Management Co., Ltd. 48°34'20"N 87°26'27"E (approximate location)
	Tapestry	Tapestry Collection by Hilton Turpan ¹⁵⁷	TBD	Investor: China Green Development Group.
	DoubleTree by Hilton	DoubleTree by Hilton Kuqa ¹⁵⁸	TBD	Investor: China Green Development Group.
	N/A	Hilton Hotel Turpan ¹⁵⁹	TBD	41°42'59.8"N 82°56'57.5"E (approximate location) Investor: China Green Development Group.
	UrCove	UrCove by Hyatt Sayram Lake ¹⁶⁰	2025-Q4	44°37'03"N 81°21'49"E (approximate location) Architect: ZEN Architects.
Hyatt (USA)		UrCove Urumqi High Speed Railway Station ¹⁶¹	2025-Q4	43°50'05"N 87°31'43"E
		UrCove Kashgar Wanda Plaza ¹⁶²	2025-Q3	
		UrCove Altay ¹⁶³	TBD	
		<u>Holiday Inn Downtown</u> <u>Express Kashgar</u>	2025-Q2	
IHG (UK)	Holiday Inn	<u>Holiday Inn Express</u> <u>Urumqi Silk Road Resort</u>	2025-Q2	43°26'36"N 87°25'08"E (approximate location)
		<u>Holiday Inn Express</u> <u>Nalati</u>	2025-Q3	Dual-branded with Hotel Indigo Nalati. Architect: H2 Architecture Design Group; Developer: China Green Development Group;

¹⁵⁵ "Hilton Garden Inn Karamay," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/34896</u>.

¹⁶¹ "UrCove Urumqi High Speed Railway Station," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/39728</u>.

¹⁵⁶ "Conrad Altay Hemu Ski Resort," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/45471</u>.

¹⁵⁷ "Tapestry Collection by Hilton Turpan," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/46945</u>.

¹⁵⁸ "DoubleTree by Hilton Kuqa," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/46946</u>. ¹⁵⁹ "Hilton Hotel Turpan," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/46944</u>.

¹⁶⁰ "UrCove by Hyatt Sayram Lake," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/41036</u>.

¹⁶² "Hyatt Around the World," Hyatt, accessed March 24, 2025, <u>https://www.hyupdates.com/2025-openings</u>.

¹⁶³ "Hyatt Around the World," Hyatt, accessed March 24, 2025, <u>https://www.hyatt.com/development/explore-hotels</u>.

				General Contractor: China Construction Eighth Engineering Division Corp.
		Holiday Inn Kuytun ¹⁶⁴	TBD	Developer: China Green Development Group.
	EVEN Hotel	Even Hotel Yining ¹⁶⁵	2025-Q3	Dual-branded with InterContinental Yining. Architect: HKS Architects; Developer: China Green Development Group; General Contractor: China Construction Eighth Engineering Division Corp. 43°54'09"N 81°16'44"E
	Kimpton Hotels	Kimpton Hotel Changji ¹⁶⁶	TBD	Developer: China Green Development Group.
	Crowne Plaza	Crowne Plaza Changji ¹⁶⁷	TBD	Developer: China Green Development Group.
		Crowne Plaza Sailimu Lake and Indigo Sailimu Lake (dual-branded) ¹⁶⁸	2025-Q4	44°38'47"N 81°19'19"E (approximate location)
		Urumqi Crowne Plaza Hotel ¹⁶⁹	TBD	Architect: Xinjiang Architectural Design and Research Institute Co., Ltd.; Developer: Silkroad Resort; General Contractor: Nantong Sijian Construction Group.
				43°26'36"N 87°25'07"E (approximate location)
	HUALUXE	Hualuxe Hotel Kashgar ¹⁷⁰	TBD	Developer: China Green Development Group.
	InterContinental	InterContinental Urumqi ¹⁷¹	2027	Developer: Xinjiang Jubaokun Real Estate Development Co., Ltd.
		InterContinental Kashgar ¹⁷²	TBD	Developer: China Green Development Group.
		InterContinental Yining ¹⁷³	2025-Q3	Dual-branded with EVEN Hotel Yining. The company that designed the signage for the hotel, Shenzhen Asiantime Beyond Design Consultant Co., Ltd., despite excluding Uyghur

 ¹⁶⁴ "Holiday Inn Kuytun," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47055</u>.
 ¹⁶⁵ "Even Hotel Yining," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47050</u>.
 ¹⁶⁶ "Kimpton Hotel Changji," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47050</u>.
 ¹⁶⁷ "Crowne Plaza Changji," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47051</u>.
 ¹⁶⁸ "Crowne Plaza Sailimu Lake," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/45312</u>.
 ¹⁶⁹ "Urumqi Crowne Plaza Hotel," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/43691</u>.
 ¹⁷⁰ "Hualuxe Hotel Kashgar," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47054</u>.

¹⁷¹ "InterContinental Urumqi," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47610</u>.

¹⁷² "InterContinental Kashgar," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47052</u>.

¹⁷³ "InterContinental Yining," Top Hotel Projects (paywall), accessed March 24, 2025, https://app.tophotelprojects.com/constructions/45090.

				language script from the hotel signage, <u>note</u> that their design "features bilingual labels in English and Chinese, incorporating elements of local ethnic scripts in its design, symbolizing the fusion and harmony of cultures." The company won an award for the signage. Architect: HKS Architects; Developer: China Green Development Group; General Contractor: China Construction Eighth Engineering Division Corp. 43°54'09"N 81°16'44"E
		<u>Hotel Indigo Nalati</u>	2025-Q3	Dual-branded with Holiday Inn Express Nalati.
	Indigo	Indigo Kom-Kanas ¹⁷⁴	2025-Q4	This Hotel will be located in Burqin Jikeplin International Ski Resort. Architect: Ecadi and NDA Group; Consultant: Minch International Engineering Consulting Co., Ltd.; Developer: Xinjiang Altay Tourism
				Development Group Co., Ltd.; General Contractor: Vital Stock; Interior Decorator: Stack Studio (Australia).
	Four Points by Sheraton	<u>Four Points by Sheraton</u> <u>Ghulja (Yining)</u>	Likely 2025	Appears on Marriott website but not bookable at time of writing. 43°56'39"N 81°16'32"E (approximate location)
Marriott (USA)	Fairfield by Marriott	<u>Fairfield by Marriott</u> <u>Yining</u>	Likely 2025	Appears on Marriott website but not bookable at time of writing. 43°56'50"N 81°16'22"E (approximate location)
		Fairfield by Marriott Hami ¹⁷⁵	TBD	Developer: China Green Development Group.
	Renaissance Hotel and Courtyard Hotel (dual-branded)	Renaissance Korla and Courtyard by Marriott Korla (dual-branded) ¹⁷⁶	TBD	Architect: AEDAS and China Southwest Architectural Design and Research Institute Corp. Ltd; Developer: China Green Development Group; General Contractor: China Construction Eighth Engineering Division Corp.; Interior Designer: Hirsch Bedner Associates. 41°43'44"N 86°07'50"E

¹⁷⁴ "Indigo Kom-Kanas," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/40685</u>.

¹⁷⁵ "Fairfield by Marriott Hami," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47049</u>.

¹⁷⁶ "Renaissance Korla," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/45093</u>.

	Sheraton	Keketuohai Sheraton Hotel ¹⁷⁷	TBD	
	N/A	Marriott Hotel Sailimu Lake ¹⁷⁸	TBD	44°36'23"N 81°22'34"E (approximate location)
	N/A	Marriott Hotel Aksu ¹⁷⁹	TBD	Developer: China Green Development Group. 41°11'21"N 80°14'53"E (approximate location)
	JW Marriott	JW Marriott Sailimu Lake ¹⁸⁰	TBD	Developer: China Green Development Group. 44°38'06"N 81°20'05"E (approximate location)
Autograph Collection and AC Hotel (dual- branded)		Autograph Collection Sailimu Lake and AC Hotel Sailimu Lake (dual-branded) ¹⁸¹	TBD	Developer: Xinjiang Dingshi Investment Co., Ltd. 44°37'21"N 81°21'18"E (approximate location)
	Westin, Ritz- Carlton, Aloft (dual-branded)	Westin Urumqi, Ritz- Carlton Urumqi, and Aloft Urumqi (dual- branded) ¹⁸²	2026-Q2	Architect: CITIC Central Institute of Architectural Design and Research; Developer: China Green Development Group; General Contractor: China Construction Eighth Engineering Division Corp. 43°52'40"N 87°37'21"E
	Le Meridien	Le Meridien Sailimu Lake ¹⁸³	TBD	Developer: China Green Development Group. 44°36'39"N 81°22'20"E (approximate location)
Minor Hotels (Thailand)	Hotel (dupl-		2026	In a press release announcing the hotel, Minor Hotels notes that the project will include a "cultural performance centre" that will "host regular music and dance shows, while the commercial area, inspired by the ancient Silk Road design, aims to create an exotic shopping and leisure venue." ¹⁸⁵

 ¹⁷⁷ "多家高端旅游酒店将进驻新疆 签约总额超126亿元 [Many high-end tourist hotels to enter Xinjiang with a total contract value of over 12.6 billion yuan],"人民日报 [People's Daily], June 13, 2023, <u>http://xi.people.com.cn/n2/2023/0613/c186332-40455564.html</u>.
 ¹⁷⁸ Ibid.

¹⁷⁹ "Marriott Hotel Aksu," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/46949</u>.

¹⁸⁰ "JW Marriott Sailimu Lake," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/46947</u>.

¹⁸¹ "Autograph Collection Sailimu Lake," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions</u> /<u>47069</u>.

¹⁸² "Westin Urumqi," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/45089</u>.

¹⁸³ "Le Meridien Sailimu Lake," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/47056</u>.

¹⁸⁴ "NH Hotel Yining," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/45704</u>.

¹⁸⁵ "Minor Hotels to Debut the Tivoli and NH Hotel Brands in Northwest China," Minor Hotels, July 1, 2024, <u>https://media.minorhotels.com/en-</u> <u>CEU/240701-minor-hotels-to-debut-the-tivoli-and-nh-hotel-brands-in-northwest-china</u>; Abdullah Qazanchi, Abduweli Ayup, Elise Anderson, and Henryk Szadziewski, "The Persecution of Uyghur Intellectual and Cultural Producers: Genocide Through Eliticide," *The Geopolitics*, February 11, 2022. <u>https://thegeopolitics.com/the-persecution-of-uyghur-intellectual-and-cultural-producers-genocide-through-eliticide/</u>.

	Days Inn by Wyndham Days Hotel by Wyndham Exhibition Center ¹⁸⁶		TBD	
	Wyndham Sailimu Lake ¹⁸⁷		TBD	Developer: People Electric. 44°37'41"N 81°20'42"E (approximate location)
		<u>Super 8 Hotel Yuepu</u> Lake Pearl Plaza Branch	TBD	
		<u>Super 8 Hotel Kashgar</u> <u>Tianshan South Road</u> <u>Branch</u>	TBD	
		<u>Super 8 Hotel Kashgar</u> <u>Ancient City People's</u> <u>Park Branch</u>	TBD	
	Super 8	<u>Super 8 Hotel Yecheng</u> <u>County Nanhuan Road</u> <u>Branch</u>	TBD	
		<u>Super 8 Hotel Korla</u> <u>Development Zone</u>	TBD	
Wyndham (USA)		<u>Super 8 Hotel Shufu</u> <u>County Zhanmin Road</u> <u>Branch</u>	TBD	
		<u>Super8 Yue Hotel</u> <u>Urumqi Nanhu Municipal</u> <u>Government Branch</u>	TBD	
		<u>Super 8 Hotel Yecheng</u> <u>Xueyu Avenue Branch</u>	TBD	
		<u>Super8 International</u> <u>Hotel Urumqi Xinbei</u> <u>Yuanchun Branch</u>	TBD	
		<u>Super8 Hotel Kashgar</u> <u>Shule County Shule</u> <u>Avenue Branch</u>	TBD	
	Super 8 Select	<u>Super 8 Select Hotel</u> <u>Korla Golden Triangle</u> <u>New Metropolis Branch</u>	TBD	
		<u>Super 8 Select Hotel</u> <u>Kashgar First People's</u> <u>Hospital Branch</u>	TBD	
		<u>Super 8 Select Hotel</u> <u>Xinhe County Hexie East</u>	TBD	

¹⁸⁶ "3月签约开业酒店合集:希尔顿、万豪、温德姆、丽呈... [Collection of hotels that signed contracts and opened in March: Hilton, Marriott, Wyndham, Regent...]," 环球旅讯 [Travel Daily], April 8, 2024, <u>https://traveldaily.cn/article/181145</u>.

¹⁸⁷ "Wyndham Sailimu Lake," Top Hotel Projects (paywall), accessed March 24, 2025, <u>https://app.tophotelprojects.com/constructions/46368</u>.

		Road Branch		
		<u>Super 8 Select Hotel</u> <u>Urumqi Grand Bazaar</u> <u>Tuanjie Road Branch</u>	TBD	
		<u>Super 8 Select Hotel</u> <u>Keping County Jiefang</u> <u>Road Branch</u>	TBD	
		<u>Super 8 Select Hotel</u> <u>Kashgar Wanda Plaza</u> <u>Shuguang International</u> <u>Branch</u>	TBD	
		<u>Super 8 Select Hotel</u> <u>Shanshan County</u> <u>Xincheng East Road</u> <u>Branch</u>	TBD	
	Urumqi Econo Development Haihong Brand Super 8 Select	<u>Super 8 Select Hotel</u> <u>Urumqi Economic</u> <u>Development Zone</u> <u>Haihong Branch</u>	TBD	
		<u>Super 8 Select Hotel</u> <u>Changji Shihezi West</u> <u>Road Branch</u>	TBD	

Appendix III. Local Management Partners of Hotels Under Review

Table 5: Local Management Partners in the Uyghur Region						
Hotel Chain	Hotel Brand	Hotel in East Turkistan	Local Management Partner ¹⁸⁸			
Accor (France)	Grand Mercure	<u>Grand Mercure</u> <u>Urumqi Hualing</u>	Xinjiang Hualing Hotel Co., Ltd. (新疆华凌大饭店有限责任公司). ¹⁸⁹			
	Mercure	<u>Mercure Turpan</u> <u>Downtown</u>	Turpan Huozhou Hotel Co., Ltd. (吐鲁番市火洲大酒店有限责任公司). ¹⁹⁰			
		<u>Mercure Urumqi</u> <u>Doowin Wanda</u>	Unclear.			

¹⁸⁸ None of the hotel chains list management partners at the local level. Through open sources, UHRP was able to match hotels with Chinese hotel management companies which appear to manage hotel operations at the local level. In other cases, the Chinese hotel management companies listed in this table share the same address as the corresponding hotels, indicating a likely management relationship. UHRP indicates if there is insufficient data available.

¹⁸⁹ Xinjiang Hualing Hotel Co., Ltd. shares the same address as the hotel. See: "Xinjiang Hualing Hotel Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328244995303786</u>.

¹⁹⁰ Turpan Huozhou Hotel Co., Ltd. shares its corporate address with the hotel. See: "Turpan Huozhou Hotel Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328245301489005</u>.

		<u>Plaza</u>		
		<u>Mercure Urumqi</u> <u>Downtown</u>	Xinjiang Shunshi Boye Hotel Management Co., Ltd. (新疆顺世博业酒店管理 有限公司). ¹⁹¹	
		<u>Mercure Urumqi</u> <u>South Lake</u>	Urumqi Ruitai Asset Management Co., Ltd. Shuimogou District Branch (乌鲁 木齐瑞泰资产管理有限公司水磨沟区分公司). ¹⁹²	
		<u>ibis Changji Jianshe</u> <u>Road Snack Street</u>	Unclear.	
	ibis	<u>ibis Urumqi Railway</u> <u>Station</u>	Urumqi Baoying Pinyue Hotel Management Co., Ltd. (乌鲁木齐宝盈品悦酒店 管理有限公司). ¹⁹³	
		<u>ibis Urumqi Weixing</u> <u>Square Hotel</u>	Unclear.	
	Conrad	<u>Conrad Urumqi</u>	Xinjiang Times International Hotel Management Co., Ltd. (新疆时代国际酒店 管理有限公司). ¹⁹⁴	
Hilton (USA)	Hilton	<u>Hilton Urumqi</u>	Xinjiang Hongguangshan Hotel Co., Ltd. Urumqi Hilton Hotel Branch (新疆红光山大酒店有限责任公司乌鲁木齐希尔顿酒店分公司). ¹⁹⁵	
	Hampton	<u>Hampton by Hilton</u> <u>Turpan</u>	Xinjiang Hengde Hotel Management Co., Ltd. (新疆恒得酒店管理有限公司). ¹⁹⁶	
		<u>Hampton by Hilton</u> <u>Urumqi Exhibition</u> <u>Center</u>	Xinjiang Hongguangshan Hotel Co., Ltd. Urumqi Hilton Hotel Branch (新疆红 光山大酒店有限责任公司乌鲁木齐希尔顿酒店分公司). ¹⁹⁷	
		<u>Hampton by Hilton</u> <u>Urumqi</u>	Xinjiang Silk Road Huanqiu Hotel Management Co., Ltd. (新疆丝路寰球酒店	

¹⁹¹ Xinjiang Shunshi Boye Hotel Management Co., Ltd. shares its corporate address with the hotel. See: "Xinjiang Shunshi Boye Hotel Management Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328245301489005</u>. See also: "Xinjiang Shunshiboye Hotel Management Co., Ltd.," Mercure Urumqi Railway Bureau, accessed on March 24, 2025, <u>https://archive.ph/dmMQk</u>.

¹⁹² "乌鲁木齐瑞泰资产管理有限公司水磨沟区分公司 [Urumqi Ruitai Asset Management Co., Ltd. Shuimogou District Branch (Mercure Hotel (City Hall Branch))]," 聘乌鲁木齐城市快网 [Urumqi City Express]," accessed on March 24, 2025, <u>https://archive.ph/wsOiA</u>; Urumqi Ruitai Asset Management Co., Ltd. Shuimogou District Branch shares its corporate address with the hotel. See: "Urumqi Ruitai Asset Management Co., Ltd. Shuimogou Branch," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328310409669117</u>.

¹⁹³ Urumqi Baoying Pinyue Hotel Management Co., Ltd. appears to be located in the same building as the hotel. See: "Urumqi Baoying Pinyue Hotel Management Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250331334405281373</u>; see also: "乌鲁 木齐宝盈品悦酒店管理有限公司 [Urumqi Baoying Pinyue Hotel Management Co., Ltd.]," 店长直聘 [Store Manager Direct Recruitment], accessed on March 24, 2025, <u>https://archive.ph/wInIq</u>.

¹⁹⁴ Xinjiang Times International Hotel Management Co., Ltd. shares its corporate address with the hotel. See: "Xinjiang Times International Hotel Management Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328233012177128</u>; see also: "新疆时代国际酒店管理有限公司乌鲁木齐康莱德酒店 [Xinjiang Times International Hotel Management Co., Ltd. Urumqi Conrad Hotel]," *企知道* [Enterprise Knowledge], accessed on March 24, 2025, <u>https://qiye.qizhidao.com/law/ad6eb787e84ea584716e1f72894fb6bd.html</u>.

¹⁹⁵ Xinjiang Hongguangshan Hotel Co., Ltd. Urumqi Hilton Hotel Branch shares its corporate address with the hotel, and lists <u>www.hilton.com.cn</u> in its contact information. See: "Xinjiang Hongguangshan Hotel Co., Ltd. Urumqi Hilton Hotel Branch," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328233783929079</u>; see also: "新疆红光山大酒店有限责任公司乌鲁木齐希尔顿酒店分公 [Xinjiang Hongguangshan Hotel Co., Ltd.]," accessed on March 24, 2025, <u>https://archive.ph/ljzWX</u>.

¹⁹⁶ "新疆恒得酒店管理有限公司 [Xinjiang Hengde Hotel Management Co., Ltd.]," accessed on March 24, 2025, <u>https://archive.ph/H32gW</u>; see also: "Xinjiang Hengde Hotel Management Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K2503</u> 28234287245579.

¹⁹⁷ "乌鲁木齐希尔顿酒店 [Hilton Urumqi]," 聘直 [Hire], accessed on March 24, 2025, <u>https://archive.ph/AqUED</u>.

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		<u>International</u> <u>Airport</u>	管理有限责任公司). ¹⁹⁸
	Home2 Suites	<u>Home2 Suites by</u> <u>Hilton Xinjiang Bole</u>	Bole Bao'an Hotel Management Co., Ltd. (博乐宝岸酒店管理有限公司). ¹⁹⁹
IHG (UK)	Holiday Inn Express	<u>Holiday Inn Express</u> <u>Horgos</u>	Khorgos Jiayi Hotel Management Co., Ltd. (霍尔果斯嘉逸酒店管理有限公司). ²⁰⁰
		<u>Holiday Inn Express</u> <u>Urumqi Station</u>	Unclear.
Marriott (USA)	Sheraton Hotels and Resorts/ Four Points by Sheraton	<u>Four Points by</u> <u>Sheraton Urumqi</u>	Urumqi Zhongcheng Silk Road Sports Management Co., Ltd. Zhongjian Fupeng Sheraton Hotel Branch (乌鲁木齐中城丝路体育管理有限公司中建福朋 喜来登酒店分公司). ²⁰¹
	Wyndham	<u>Wyndham Urumqi</u> <u>North</u>	Xinjiang Junhao Hotel Company, Ltd. (新疆君豪酒店有限公司). ²⁰²
	Super 8	<u>Super 8 Hotel</u> <u>(Urumqi People's</u> <u>Cinema</u>)	
Wyndham		<u>Super 8 Hotel</u> (<u>Urumqi Museum</u> <u>Hami Road)</u>	
(USA)		<u>Super 8 Hotel</u> (<u>Urumqi Liyushan</u> <u>Branch)</u>	Super 8 (Beijing) International Hotel Management Co., Ltd. (速伯艾特(北京)国际酒店管理有限公司). ²⁰³
		<u>Super 8 Hotel</u> (Urumqi Daximen People's Square)	
	Super 8 Select	<u>Super 8 Select Hotel</u> (Urumqi Airport)	

¹⁹⁸ Xinjiang Silk Road Huanqiu Hotel Management Co., Ltd. shares its corporate address with the hotel. See: "Xinjiang Silk Road Huanqiu Hotel Management Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328239932776780</u>.

¹⁹⁹ Bole Bao'an Hotel Management Co., Ltd. shares its corporate address with the hotel. See: "Bole Bao'an Hotel Management Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250331348762382947</u>.

²⁰⁰ Khorgos Jiayi Hotel Management Co., Ltd. shares its corporate address with the hotel. See: "Khorgos Jiayi Hotel Management Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328316642405952</u>.

²⁰¹ Urumqi Zhongcheng Silk Road Sports Management Co., Ltd. Zhongjian Fupeng Sheraton Hotel Branch shares its corporate address with the hotel. See: "Urumqi Zhongcheng Silk Road Sports Management Co., Ltd. Zhongjian Fupeng Sheraton Hotel Branch," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250328046323705927</u>.

²⁰² "新疆君豪酒店有限公司 [Xinjiang Junhao Hotel Co., Ltd.]," 石河子大学智慧就业服务平台 [Shihezi University Smart Employment Service], accessed on March 24, 2025, <u>https://archive.ph/P704z</u>. Xinjiang Junhao Hotel Co., Ltd. shares its corporate address with the hotel. See: "Xinjiang Junhao Hotel Co., Ltd.," Riscern (paywall), accessed on March 24, 2025, <u>https://riscern.com/company-info?key=K250331350045842040</u>.

²⁰³ Super 8 (Beijing) International Hotel Management Co., Ltd. appears to manage all Super 8 locations across China. See: "速伯艾特(北京)国际酒店 管理有限公司 [Super 8 (Beijing) International Hotel Management Co., Ltd.]," Baidu, accessed on March 24, 2025, <u>https://archive.ph/wip/D55nI</u>.