

Manifest Risk: New “Air Silk Road” Cargo Flights Carry Risk of Uyghur Forced Labor into Europe

Appendix II. (Corporate responses)

On July 14, 2025, the authors sent emails to Alpha Sky, Camex Airlines, European Cargo, Geo-Sky, MNG Airlines, My Freightier, MyWay Airlines, SF Airlines, Silk Way Airlines, Titan Airways, and Uzbekistan Airways informing them that their company had been named in a forthcoming report. The email addresses or contacts of the cargo companies are all publicly listed. We received responses from three companies, which can be found online.

Last Updated: July 22, 2025

European Cargo

July 18, 2025

Hi Peter,

On behalf of European Cargo Limited, thank you for the opportunity to comment on your research report. Below is the company’s response.

As a small business that strives to operate ethically, European Cargo Ltd continues to review and update our practices in accordance with legal guidance and external regulatory developments. Global supply chains are dynamic and complex, but we have made clear to our clients our expectations of ethical behaviour as well as compliance with relevant laws across the supply chain at all times.

European Cargo Ltd recognises the importance of this issue to the Uyghur people, to the principles contained in the Universal Declaration of Human Rights and to the sustainability of our own business. We remain vigilant about the challenges of managing this risk. An example of this is our careful consideration of the World Uyghur Council v National Crime Agency court case, leading to updates to our business practices.

In addition to adhering to the UK Modern Slavery Act, the Proceeds of Crime Act and other applicable laws we have put in place enhanced due diligence requirements, in particular for suppliers operating in higher risk jurisdictions. We have also implemented a whistleblower process, a code of conduct for employees and suppliers and an ongoing dialogue with our clients.

I hope this is helpful. Do let me know if you have any further questions.

Best,

*Dan Baxter
Coast to Coast Consultancy*

Geo-Sky

July 16, 2025

Dear Mr. Irwin,

We acknowledge receipt of your email dated July 14, 2025, concerning our operations and the human rights concerns you have raised regarding forced labor in the Xinjiang Uyghur Autonomous Region (XUAR). We understand the gravity of the issues presented in your forthcoming report and appreciate you bringing these matters to our attention.

We are a dedicated cargo airline whose primary business model is the provision of air transport capacity. Our operations are strictly limited to flying cargo from one airport to another. We do not directly engage in cargo collection, freight forwarding, or the procurement and sourcing of goods. Our role is confined to providing air transport services, often through wet lease agreements, to other companies such as freight forwarders, logistics providers, or other airlines, who are responsible for booking and managing the specific cargo.

In line with our commitment to legitimate and compliant operations, we implement robust Know Your Customer (KYC) procedures for all companies with whom we enter into direct contractual agreements for flight services. These procedures are designed to ensure the legitimacy and compliance of our business partners. However, as an air carrier providing capacity, we do not have direct visibility into, nor knowledge of, the specific contents, precise origin (beyond the airport of loading), or the production methods of the individual consignments of cargo transported by our customers.

Therefore, we firmly state that we have no knowledge of or involvement in the alleged issues raised by UHRP regarding forced labor-tainted goods.

Airline GEO SKY LLC is committed to operating ethically and in full compliance with all applicable international laws and regulations. We take human rights concerns seriously and are committed to upholding human rights across our operations.

Finally, as you know, your email references cargo flights from Ürümqi between June 2024 and May 2025. We wish to note that, due to commercial considerations, we ceased operating

flights to Ürümchi in April 2025 and have no plans to start operating flights to Ürümchi in the near future.

We trust this clarifies our position and operational scope. We remain open to further dialogue within the scope of our operational remit.

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Best regards,

*Tamar Bekauri
Office Manager
Administration Department*

CAMEX Airlines

July 17, 2025

Dear Peter,

Thanks a lot for your email.

We will look into this information and get back to you asap.

As preliminary feedback, Camex is just a charterer, transporter of goods, we are not selling the cargo or are in contact with the shippers or manufacturers, we are flying for Charter companies. Also, you mentioned that we are taking goods manufactured in Urumqi, which is also not accurate, our goods are delivered to Urumqi by trucks and other means of transportation from western and southern China, maybe this information helps you a little bit, although we will send more thorough information till 21 July.

Thanks again and let's keep in touch.

*Sincerely,
Shako
Shako Seturidze
COO*

July 22, 2025

Dear Peter,

As discussed previously, please see our response to your request.

Camex Airlines LLC opposes forced labour.

To the best of our knowledge, we do not carry any goods produced by forced labour.

If you have specific grounds to believe that Camex Airlines LLC have been, as a matter of fact, involved in the carriage of goods tainted by force labour, we encourage you to provide the underlying evidence (other than the mere fact that we perform flights to a specific region of China) so that we can assess the claim on its merits based on specific evidence.

At the same time, please note that as any other air carrier, we are unable to investigate the full supply chain up to the manufacturer of the raw materials, and largely rely on our local counterparts and their contractual representations that the goods brought to us for carriage comply with the relevant laws and regulations, including those prohibiting the use of forced labour.

We are open to cooperate on this matter, looking forward to your response.

*Sincerely,
Shako Seturidze
COO*