Hikvision, Xinjiang, Uyghurs & Human Rights Abuses

WHITE PAPER

HIKVISION

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IPVM

Author's Note

This white paper provides an in-depth examination of Hikvision's role in human rights abuses in a single 32-page document. Our goal is to assist the public in assessing the facts of Hikvision's actions. Recent reporting by *The Financial Times* states that the US may place Hikvision on the Specially Designated National (SDN) list. If enacted, this may represent an historic development in US-China relations. Per the US Treasury Department, listed entities' "assets are blocked and U.S. persons are generally prohibited from dealing with them," potentially impacting access to financial services or business relationships globally. As such, a unified resource on the case against Hikvision has increased importance.

We detail and contextualize Hikvision's role in mosque and concentration camp surveillance, Xinjiang's enormous mass surveillance networks, and Uyghur ethnicity detection 'AI.' Additionally, we detail Hikvision's background, responses to allegations of human rights abuses, and other salient issues. Primary source evidence is included or linked, in particular Hikvision's own documents where available.

Please do not hesitate to reach out to IPVM with any questions or comments.

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1. Why Hikvision?

Hikvision's addition to the SDN list would be consistent with existing US policy on Xinjiang, which has focused on sanctioning PRC entities supplying surveillance hardware and software for public security forces in the region, reflecting the key role of such technology surveillance in rights abuses. For example:

- In 2019, the US Department of Commerce sanctioned several PRC surveillance entities, including Hikvision, to impede their access to US technology over fears it would contribute to human rights violations.
- In June 2021, President Biden signed an executive order prohibiting US investments "in Chinese defense and surveillance technology firms", including Hikvision, in order to counter "repression and serious human rights abuses."
- In December, 2021, the US sanctioned SenseTime over its work on surveillance technology targeting Uyghurs, "highlighting the human rights abuse enabled by the malign use of technology."

The deployment of surveillance networks with extensive coverage of public areas and advanced analytic capabilities has been a signature element of China's campaign of repression against Uyghurs, with numerous reports on Xinjiang emphasizing how surveillance is strategically fundamental to the region's harsh security regime. Millions of Uyghurs are monitored constantly, providing authorities with detailed, automatically-processed data on each individual's behavior. These systems come with built-in functionality to enable harassment and privacy violations by local authorities, and even to flag individuals for detention in concentration camps.

Surveillance in Xinjiang also provides the critical ability for small numbers of public security forces to control large groups of individuals, particularly in concentration camps. Ovalbek Turdakun, a witness from the camps who recently arrived in the United States, said Hikvision devices were like virtual prison guards in his cell, and a recent book explains how cameras "allowed

1-3 guards to manage an entire floor of the camps, so thousands of people."

For these reasons, US officials looking to counter abuses in Xinjiang with sanctions have naturally gravitated towards entities involved in surveillance. Hikvision is easily the PRC's most notable, and the world's largest, surveillance company, with 53,000+ employees, $12B USD in 2021 revenue, and market share in 150+ countries.

Hikvision further sets itself apart due to the involved nature of its work in Xinjiang. In many known instances, Hikvision is not simply a passive supplier but is also contracted to design, implement, and directly operate Xinjiang surveillance as far in the future as 2040. The company has even collaborated with the government as a co-author on national/provincial standards for surveillance which mandate the targeting of Uyghurs.

Hikvision's origins and ownership may be an additional factor in its selection for sanctions, since Hikvision is functionally an extension of the state. It was created by the PRC government in 2001, and remains a state-controlled enterprise per its own financial filings. Specifically, Hikvision originated from the No. 52 Research Institute of the China Electronics Technology Group Corporation (CETC), its state-owned parent company, which was created to develop military applications for consumer technologies. Per the NYTimes, "CETC traces its roots to the military research labs that helped build China's first nuclear bomb, satellite and guided missile.

Hikvision's Chairman, Chen Zongnian, holds a dual role as Director of the No. 52 Research Institute, as well as being a member of the National People's Congress. Hikvision has also touted its "substantial fiscal subsidies", having received $6 billion USD in PRC government loans and its financial filings note that the PRC government may "exert significant influence over our business and other matters of significance to us."

2. Hikvision in Xinjiang

Hikvision's is a major provider of surveillance technology in Xinjiang, and its operations have expanded considerably since 2017 in tandem with high demand for surveillance by government authorities. This includes several large, ongoing projects in regions with high Uyghur populations, deployment of surveillance systems in mosques and concentration camps, and a People's Armed Police (PAP) camp research center in the provincial capital, Urumqi.

2.1. Xinjiang 'Private-Public' Projects

In 2017, Hikvision entered into 5 'private-public partnerships' with Xinjiang public security authorities based on the 'Design-Build-Finance-Operate-Transfer' (DBFOT) model, meaning Hikvision not only supplies and constructs the projects, but is contracted to directly operate them for a period of several years. The projects, worth a combined total of ~$275 M USD (1.86 B RMB), include mass surveillance and face recognition installations across Xinjiang.

Each Hikvision project is detailed below, including links to original contract documents; the projects are also listed in Hikvision's own financial filings (p.g. 288).

Pishan Security Protection and Prevention Control System - *Pishan County, Xinjiang*

Size: $53 M USD

- Regional mass facial recognition system
- Surveillance system for Pishan concentration camp
- Mosques surveillance and video conferencing systems
- Hikvision to operate thru 2040

MoYu Security Protection and Prevention Control System/Social Defense System – *MoYu County, Xinjiang*

Size: $46 M USD

- Face recognition and surveillance cameras at all 967 mosques in MoYu County
- Mosque video lecture systems for remotely-delivered sermons.
- Regional mass surveillance system of ~35,000 cameras
- Surveillance system for Moyu concentration camp
- Hikvision to operate thru 2035

YuTian Safe City Project – *Yutian County, Xinjiang*

Size: $58 M USD

- 'Safe city' smart policing system
- Mosques surveillance and video lecture systems
- Hikvision to operate thru 2034

Urumqi High-tech Zone (New Urban Area) Safe City & Surveillance system for Social Comprehensive Management - Urumqi, Xinjiang

Size: $73 M USD

- Regional mass surveillance system of ~30,000 cameras
- Video analytics hub, intelligent monitoring system, and big data centers
- Police checkpoints
- Drones
- Hikvision to operate thru 2028

Lop Social Prevention and Control System – Lop County, Xinjiang

Size: $55 M USD

- Regional mass surveillance system
- New video monitoring and analysis center

2.2. Mosque Surveillance

Several of Hikvision's aforementioned private-public projects specify surveillance and face recognition cameras in mosques. In the Moyu County project alone, Hikvision agreed to build and operate installations at all 967 mosques in the County thru 2035. Mosque surveillance is also included in the Pishan County, and Yutian County projects.

Hikvision's mosque surveillance in these counties gives public security officials the power to track every person attending sermons. In addition to the chilling effect of such monitoring by any government on the free exercise of religious freedom, these installations raise serious concerns in the context of Xinjiang's abuses against Muslims. Simply by attending a mosque, individuals may be tagged as having "terrorist inclinations", leading to their involuntary detention in a concentration camp. Put differently, a direct consequence of Hikvision's mosque surveillance systems is that individuals are placed in camps under appalling conditions. It is difficult to imagine that Hikvision is unaware of how, and upon whom, its systems are used given that Hikvision mosques were explicitly specified in Hikvision's contract, and the company continues to directly operate these systems.
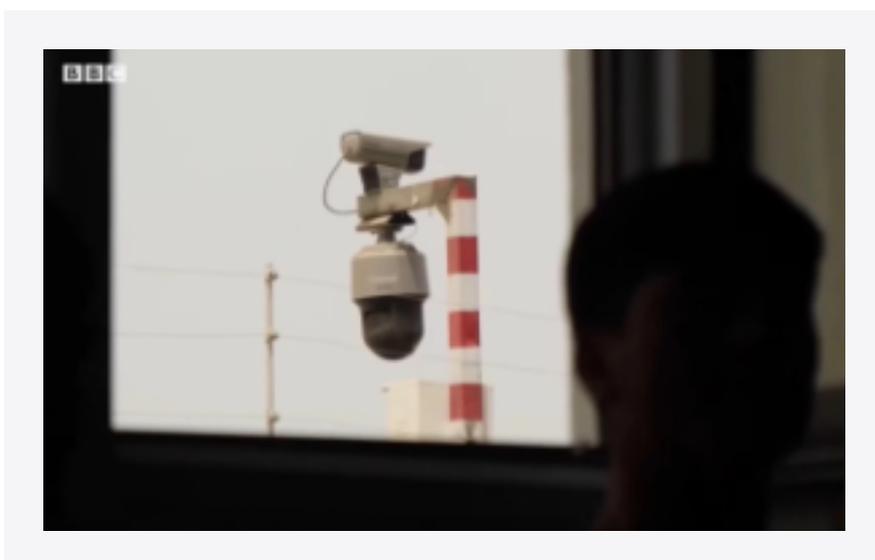
Hikvision's mosque installations also enable authorities to control the speech of Imams, further undermining religious freedom. The Moyu, Pishan, and YuTian projects all specify video lecture systems for mosques, which are used to centrally-deliver pre-vetted sermons filmed in a studio run by the PRC's Ethnic Affairs Commission.

2.3. Concentration Camp Surveillance

Hikvision has been tied in various ways to Xinjiang's infamous concentration camps, in which Uyghurs and other minorities are detained for months without trial, and subjected them to gross human rights violations. According to reports and eyewitness accounts, detainees face abuses including forced labor, indoctrination, rape, torture, medical experiments, and involuntary organ harvesting.

Hikvision's private-public partnerships detail how the company agreed to install and directly operate surveillance systems for concentration camps in the Pishan, Moyu, and YuTian county projects. Hikvision's cameras have also repeatedly appeared in investigations of Xinjiang concentration camps.

In 2019, a BBC investigation showed Hikvision equipment monitoring a concentration camp.

Specifically, IPVM identified the bottom camera as Hikvision's DarkfighterX PTZ:

In November 2021, a travel blogger visited several sites identified as concentration camps by Buzzfeed's Pulitzer-prize winning investigation using satellite imagery. The video shows numerous Hikvision cameras at various camps.

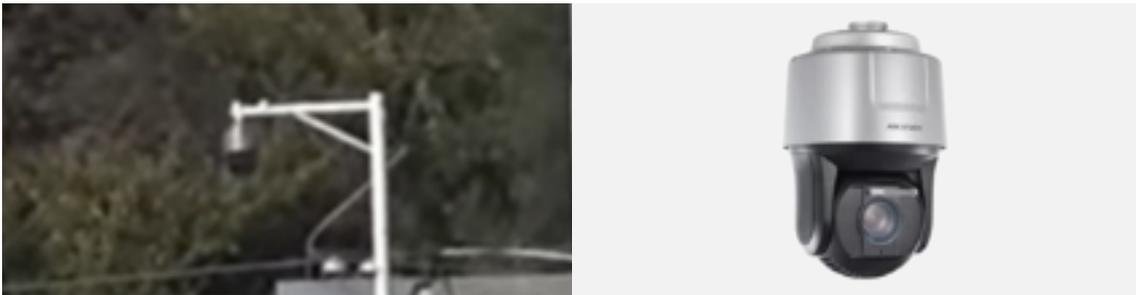In a Mori County camp, one observes two Hikvision DarkFighterX PTZs (left) and one PanoVu series (right):

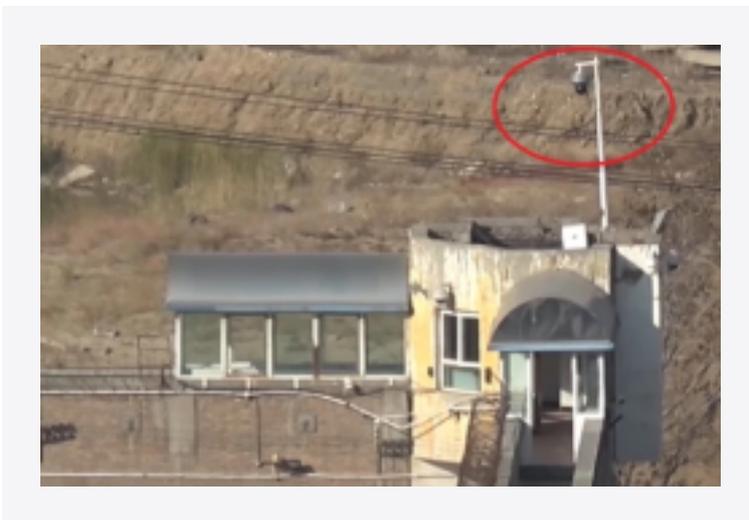Another two DarkFighterX PTZs are visible on the Mori Camp's guard towers:

PanoVu Series 360°

DarkFighterX PTZs

In Urumqi's Saybagh district prison, another Hikvision PanoVu series can be seen:

In the Yanqi County detention center, another Darkfighter PTZ:

In the Jimsar County Detention Center, a bullet camera in typical Hikvision casing can be seen:

According to reports, Hikvision's surveillance systems in Xinjiang camps are not merely used for conventional monitoring as in Western-style prisons. Ovalbek Turdakun, a witness from the camps, said Hikvision cameras acted as virtual prison guards in his cell. He and his 22 cellmates were monitored 24/7, with a speaker attached to the cameras used to enforce rules such as preventing inmates from conversing with each other. Inmates were even required to ask guards through the surveillance cameras for permission to use the toilet. Consistent with this account, a recent book explains how cameras "allowed 1-3 guards to manage an entire floor of the camps, so thousands of people."

2.4. Dominant Provider of Xinjiang Command Centers

Hikvision's role in Xinjiang surveillance may extend far beyond the 5 known public-private projects given the company's large market share and popularity in China, and given that the actual amount of surveillance installed in Xinjiang in recent years is far more extensive. This cannot be definitively proven since details such as tender documents for most surveillance projects are not available.

However, documents for a project in the Asku region of Xinjiang - discovered by IPVM just prior to publishing this white paper - indicate that Hikvision is widely used across the region. As a sole-source project bypassing the open bidding process, the tender included a justification for excluding other potential awardees in which officials emphasized that "most of" Xinjiang's county and city "Stability Maintenance Command Centers [维稳指挥中心] use the Hikvision platform":

> When the Emergency Command Center and the Stability Maintenance Command Center are connected to the monitoring video **and, at the same time, most of the [Xinjiang] County and City Stability Maintenance Command Centers use the Hikvision platform**, so this can ensure a stable connection.

> 在打通应急指挥中心与维稳指挥中心监控视频互联互通时，同时大部分县市维稳指挥中心使用海康威视平台，可保障稳定对接

The tender also noted that "in the Aksu region, in terms of other video-related applications, from front-end collections to back-end platforms, Hikvision accounts for a very large share."

The project was performed for the 45th Regiment of the 3rd Division of the Xinjiang Production and Construction Corps (XJPCC), an infamous paramilitary entity that is sanctioned by the US government. It was for "digitalization" of its Stability Maintenance and Comprehensive Management Center which mandated Hikvision gear end-to-end, including Hikvision's "iMMS-8700" platform and 18 55-inch Hikvision LCD display screens, indicating the center is used to centralize camera feeds for surveilling the local population of 2.7 million, ~80% of which are Uyghur.

In Xinjiang, "stability maintenance" is closely tied to "anti-terrorism" and often mentioned in the same breath (Anti-Terrorism Stability Maintenance/反恐维稳). "Anti-terrorism" is euphemistic for operations targeting Uyghurs.

2.5. Urumqi AI Research Institute at People's Armed Police Base

At an "Armed Police Force camp" in Urumqi, Hikvision runs an R&D center called the Hangzhou Hikvision Xinjiang Research Institute focused on developing mass surveillance and AI.

IPVM discovered this in 2020 after finding a map of R&D centers on Hikvision's own China website:

Hikvision Lists Xinjiang R&D Center

IPVM also found numerous Hikvision R&D job postings in Urumqi, showing the firm was working on large-scale government security projects in Xinjiang. For example:

Senior System Integration Design Engineer (Safe City Track)

Host the integrated design of **large-scale safe city projects**, organize project professional design engineers, and output the overall integrated design files of the project. Job requirements: 5 years or above experience in **designing large-scale integrated projects in the public security**, transportation or government industries. Pay 15-20,000 RMB per month ($2,100-$2,800). [emphasis added]
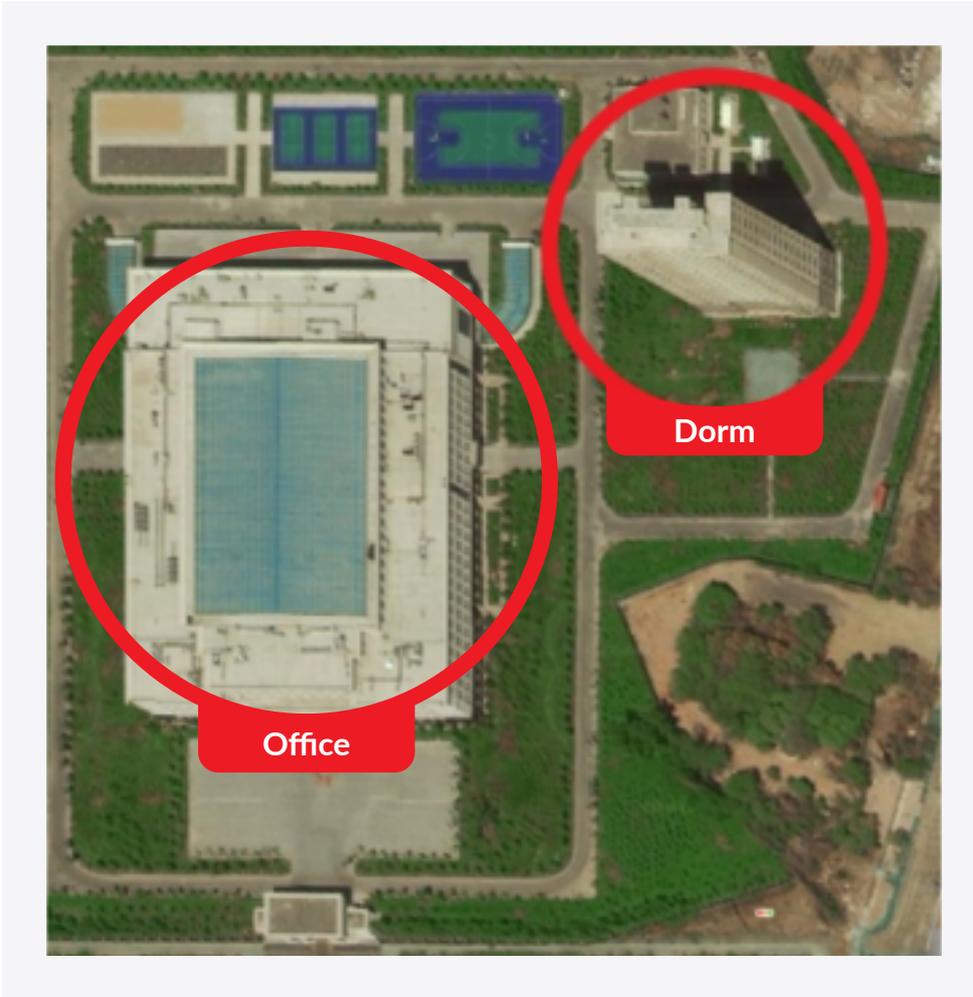
Another posting said workers are "mainly responsible for labeling image or video samples in an office working environment with computers"

The postings specified "Han nationality" as a "recruitment condition", meaning no Uyghurs could apply:

Recruitment on behalf of Hikvision

1. Recruitment conditions: Han nationality , 18-35 years old, no academic qualifications required.

Those hired would live and work in a People's Armed Police (PAP) camp "500 meters behind the Fuqian Road Chinese Medicine Hospital." IPVM used this information to locate the camp via satellite.

Aerial Overview of Base With Hikvision Workers

Here is the full list of job postings for the PAP base found by IPVM:

- December 5, 2019 (local university reposts May 19 ad)
- May 19, 2019 (urgently recruiting 5 people, Han only)
- May 15, 2019 (urgently recruiting 5 people, Han only)
- November 21, 2018 (urgently recruiting 5 people, Han only)
- October 16, 2018 (urgently recruiting 5 people, Han only)
- June 17, 2018 (urgently recruiting 5 people, Han only)
- June 9, 2018 (urgently recruiting 6 people, Han only)
- April 16, 2018 (urgently recruiting 5 people, Han only)
- February 27, 2018 (urgently recruiting 5 people, Han only)
- November 5, 2017 (urgently recruiting 6 people, Han only)

- October 26, 2017 (urgently recruiting 10 people, Han only)
- August 27, 2017 (urgently recruiting 10 people, Han only)
- July 15, 2017 (two positions, Han only)
- July 7, 2017 (two positions, Han only)
- April 22, 2017 (two positions, Han nationality)

IPVM asked Hikvision about the institute. The map of R&D centers was deleted from Hikvision's site, and they responded:

> Hikvision does not have a research institute in Xinjiang, and has corrected any information to the contrary on its website.

We confronted Hikvision about the numerous job postings, many of which listed the location as the "Hikvision Xinjiang Research Institute." All the job ads were then deleted, and Hikvision provided an updated statement:

> Hikvision has not at any time retained the external staffing services of Mai Bang Nuo Human Resources Co.,. Ltd. As such, Hikvision did not approve the release of these job ads. Furthermore, Hikvision does not have a research institute in Xinjiang, and has corrected any information to the contrary on its website.
>
> The Hikvision job ads in Urumqi were intended for our Enterprise Business Group to service commercial enterprises and not work on government projects. We have since removed the job ads to remove any confusion about their intent and will update them accordingly.

Hikvision respects all human rights as outlined in the Universal Declaration of Human Rights and other international covenants, and we integrate these provisions into our daily work processes and policies. Regarding Hikvision's recruitment policy, we are committed to providing equal job opportunities to every gender, age, nationality, religion and other protected classes, per common non-discrimination policies.

2.6. Integrated Joint Operations Platform (IJOP)

The Integrated Joint Operations Platform (IJOP) is a big-data based surveillance program used to extensively spy on Uyghurs and other minorities in Xinjiang. Human Rights Watch has reported that individuals flagged in IJOP are sent to concentration camps.

IJOP was constructed by Hikvision's parent company, the state-owned CETC. Surveillance cameras such as Hikvision's across the region are an integral part of how IJOP functions. There is some evidence specifically linking Hikvision to directly to IJOP's construction. Human Rights Watch reported that Hikvision won a contract for the construction of IJOP. And in 2018, a technology company based in Urumqi, Xinjiang called Xinjiang Yuanjian Communication Technology posted a job advertisement for a technician and project manager with the job description:

Our company cooperates with China Electronics Technology Group Corporation and Hangzhou **Hikvision** Technology Co., Ltd. to be responsible for the construction, implementation and operation and maintenance of the overall project. [emphasis added]

The company references the IJOP directly, writing:

> In 2016, according to the requirements of the Party Committee of the Xinjiang Autonomous Region, the maintenance of social stability in Xinjiang required the accelerated construction of the 'integrated joint operational platform' in 60 pilot counties in Xinjiang. [emphasis added]

3. Uyghur Detection AI Cameras

In 2018, Hikvision inadvertently showcased "ethnic minority" detection technology at the AI Cloud World Summit. The demonstration did not specify which ethnic minority was being detected (as discussed in the following section, "ethnic minority" typically refers to Uyghurs in the context of PRC surveillance).

In November, 2019, IPVM discovered a camera on Hikvision's China website marketed as automatically identifying Uyghurs. Previously in 2019, Hikvision told the New York Times that it "began phasing [minority analytics] out in 2018." As this 2019 Hikvision product shows, that was not the case. Below is the text of the product description in Chinese and translated English:

支持分析人员目标的性别属性（男、女），支持分析人员目标的种族属性（如维族、汉族）以及人种肤色属性（如白人、黄种人、黑人）；支持分析人员是否戴眼镜、是否戴口罩、是否戴帽子、是否蓄胡子，识别准确率均不低于90%

Capable of analysis on target personnel's sex (male, female), **ethnicity (such as Uyghurs, Han)** and color of skin (such as white, yellow, or black), whether the target person wears glasses, masks, caps, or whether he has beard, with an accuracy rate of no less than 90%. [emphasis added]

A third example of Hikvision ethnicity detection was recently discovered in the product description for Hikvision's DeepinMind data server, which included minority and beard detection. The webpage was first posted in 2020, further indicating that Hikvision has not phased out minority analytics.

是否少数民族：未知、是、否(协议文档不体现)
是否大胡子：未知、是、否

Whether it is a minority group: unknown, yes, no (not shown in the agreement document)

Bearded or not: unknown, yes, no

Face Attribute	年龄段:未知、少年、青年、中年、老年
	性别:未知、男、女
	是否微笑：未知、是、否
	是否戴眼镜：未知、是、否、戴墨镜
	是否少数民族：未知、是、否(协议文档不体现)
	是否大胡子：未知、是、否
	是否戴口罩：未知、是、否

4. Hikvision Co-Authorship of PRC National Policy Mandating Ethnicity Detection

Evidence indicates that Hikvision created Uyghur face detection at the direction of PRC officials, and with full knowledge that authorities would use the technology against Uyghurs. The proliferation of Uyghur face detection in China is an outcome of official state policy expressed in national standards and tenders, and Hikvision collaborated as a co-author on these policies.

In China, authorities issue detailed standards for public security projects, which govern tender specifications and dictate to whom they can be awarded. This includes numerous standards for surveillance and face recognition which specifically require ethnicity detection.

Hikvision is listed as a co-author on at least 3 of these standards, alongside such government entities as the First Research Institute of the Ministry of Public Security:

GA/T1400.3—2017 is a national standard for "public security video image information application systems" which includes "skin color" and ethnicity detection as "personal attributes" that police can search databases for ("Ethic" is a misspelling for Ethnic, per the Chinese-language column).

17	性别代码	GenderCode	GenderType
18	年龄上限	AgeUpLimit	int
19	年龄下限	AgeLowerLimit	int
20	民族代码 **Ethnicity Code!**	EthicCode	EthicCodeType
21	国籍代码	NationalityCode	NationalityCodeType
22	籍贯省市县 代码	NativeCityCode	PlaceCodeType
23	居住地行政 区划	ResidenceAdminDivision	PlaceCodeType
24	汉语口音代码	ChineseAccentCode	ChineseAccentCode
25	单位名称	PersonOrg	OrgType
26	职业类别代码	JobCategory	JobCategoryType
27	同行人数	AccompanyNumber	int
28	身高上限	HeightUpLimit	int
29	身高下限	HeightLowerLimit	int
30	体型	BodyType	BodyType
31	肤色	SkinColor	SkinColorType
32	发型	HairStyle	HairStyleType
33	发色	HairColor	ColorType

DB41/T 1514—2017 is a provincial standard for Henan police detailing "technical specifications for security system in residential districts" which tracks skin color and ethnicity ('ethic code'):

14	民族代码	EthicCode	EthicCodeType
15	国籍代码	NationalityCode	NationalityCodeType
16	籍贯省市 县代码	NativeCityCode	PlaceCodeType
17	居住地 行政区划	ResidenceAdminDivision	PlaceCodeType
18	汉语口音 代码	ChineseAccentCode	ChineseAccentCode
19	职业类别 代码	JobCategory	JobCategoryType
20	同行人数	AccompanyNumber	int
21	身高上限	HeightUpLimit	int
22	身高下限	HeightLowerLimit	int
23	体型	BodyType	BodyType
24	肤色	SkinColor	SkinColorType

DB41/T 1514—2017 mandates that residential communities have security cameras "clearly recording facial features of people entering and exiting" buildings:

> 6.4.1 [cameras are installed at] entrances and exits of residential buildings, as well as the entrances and exits of shops and clubs in the community [...] should **clearly record the facial features of the people entering and exiting** and stored in the system in image format [emphasis added]

DB4403/T 43—2020 is a local standard for Shenzhen police for security camera networks in 'Smart Parks' (industrial areas) and includes skin color and ethnicity tracking as part of "face information data for video surveillance":

15	民族代码	EthnicCode	EthnicCodeType
16	国籍代码	NationalityCode	NationalityCodeType
17	肤色	SkinColor	SkinColorType

Evidence indicates that "ethnicity" in these standards refers specifically to Uyghurs rather than generally to China's 56 officially-recognized ethnic groups. In tenders for mass surveillance projects, public security bureaus often explicitly ask for Uyghur detection rather than just ethnicity detection, and often refer back to the national standards as source material for project specifications.

Example tender from Jinyun County project

One example is a project to install "face recognition and analysis systems" in Yulin City, Guangxi, which required the systems to "support the facial attributes of the analyst's objectives (Uyghur, Han)." A similar project in Suqian City, Jiangsu, required face recognition to "Analyze the age, ethnicity, gender, whether you wear glasses, or Uyghurs" for "captured passerby pictures." Yet another project in Gangsu Province required "automatic labeling of captured faces or portrait images, including age, gender, ethnicity (Han and Uyghur)." (See: China Government Spreads Uyghur Analytics Across China)

That ethnicity detection is a pseudonym for Uyghur detection is also apparent from resources on China's internet. A Chinese facial recognition company, Bresee, which is owned by Uniview's parent company TransInfo, once uploaded an explainer to its website that "EthicCode" is meant for tracking Uyghurs specifically.

Taken together, Hikvision's co-authorship on these standards show it not only built Uyghur face detection but participated at the policy formation stage which ultimately saw the technology deployed across China.

5. Hikvision Responses to Rights Abuses Allegations

Hikvision disputes claims of human rights abuses. It has maintained that it does not know and cannot control how its products are used, for example in 2019 responding to a Reuters report on its Xinjiang private-public projects, "We don't know where and how our products being sold or being used."

Hikvision has refused, on several occasions, to disclose further information on its Xinjiang activities, efforts if any to reduce its contributions to human rights abuses, or even acknowledge that rights abuses are occurring in Xinjiang. [find and insert that other quote about different perceptions of human rights in different places]

In 2019, Hikvision hired former US Ambassador for War Crimes Issues, Pierre-Richard Prosper, to investigate and produce a report on its Xinjiang human rights compliance. He concluded:

> In the end, we do not find that Hikvision entered into the five projects in Xinjiang with the intent to knowingly engage in human rights abuses or find that Hikvision knowingly or intentionally committed human rights abuses itself or that it acted in willful disregard

Ambassador Prosper's report has never been released publicly, except for this single excerpt, which Hikvision has used numerous times in response to media investigations, or questions from government authorities, on its human rights record.

In 2021, UK Biometrics and Surveillance Camera Commissioner Professor Fraser Sampson engaged in a months-long exchange with Hikvision's UK & Ireland Marketing Director, Justin Hollis, questioning Hikvision over its

operations in Xinjiang. Hikvision explained, "we do not oversee and control our devices once they are passed to installers and we have no access to our devices without users' authorization. Operational matters are not within our remit," while also citing Ambassador Prosper's report. This represents a typical response by Hikvision.

Professor Sampson did not accept Hikvision's claim that it does not have oversight of its products given the private-public nature of its projects in Xinjiang, saying:

> This is very clearly a joint enterprise arrangement under which operational matters are expressly within the company's contractual remit, intended to last for two decades.

Hikvision would not address Sampson's general question on whether rights abuses are being committed in Xinjiang, noting it "is not a competent arbiter to decide on this matter," and citing "clashing geopolitical views" on the issue. Hikvision offered to arrange a private meeting, but refused to discuss its Xinjiang operations in an open meeting with the UK Surveillance Camera Commissioner, alleging such information was "commercially confidential."

6. Council on Ethics for Norway Government Pension Fund Global (GPFG)

Hikvision's role in rights abuses in Xinjiang has provoked condemnation and restrictions on its activities around the world. Norway's $1.35 trillion sovereign wealth fund's Council of Ethics produced a detailed report recommending divestiture from Hikvision, which found that Hikvision is involved in "serious human rights abuse" which is "ongoing." The Council emphasized Hikvision's 5 private-public projects:

> The Council attaches importance to the fact that the company has undertaken to operate and maintain the projects for periods ranging from 11 to 21 years. The Council therefore finds that there is an unacceptable risk that the company will continue to contribute to human rights abuse in the future.

The Council of Ethics also detailed its interactions with Hikvision, saying Hikvision "emphasized that the US sanctions are politically motivated," "declared that the notion that Hikvision knew what was going on in the detention camps to be a misunderstanding," and that "Hikvision was also critical of the emphasis the Council has placed on reports from 'outside news and media.'"

The Council's report further added that Hikvision "did not respond to the Council's specific questions, but explained that it had engaged an American human rights lawyer to carry out an independent investigation."

Addendum:
IPVM Background, Funding,
Conflicts of Interest

In the interests of transparency, this section provides background information on IPVM, key details such as funding sources, and past interactions with Hikvision.

IPVM is an independent, US-based research and media organization focused on surveillance technologies and businesses. We do not accept any advertising or sponsorship. IPVM is primarily funded by subscription fees from a diverse group of 15,000+ subscribers. Except to the extent that some of IPVM's subscribers work at government entities, IPVM is not funded, aligned, or otherwise formally associated with any government. It is 100% owned by its founder.

Hikvision has accused IPVM of bias and cyberbullying on various occasions. These instances are detailed below given the subject of this report.

In February 2017, Hikvision North America President Jeffrey He gave an interview to Security Sales & Integration which stated, "The online blogging site must be sensing its demise because its National Enquirer-style lies and misrepresentations get more ridiculous every day."

In June 2017, Hikvision published an article about IPVM on its US site titled "Blogger's Cyberbullying Mission Tiresome, Destined to Fail." The article accused IPVM of stoking controversy "in pursuit of blogger clicks", saying that "Hikvision has become the blogger's target of choice."

In July 2021, Hikvision resigned from the Security Industry Association (SIA) in a letter levying various accusations at IPVM, including bullying, lobbying, and having "Opaque financial motives." Hikvision said it "reached the point where it no longer wants to share membership in the organization alongside security industry publication IPVM."

In January 2022, it was revealed by Axios that Hikvision filed a complaint with Congress accusing IPVM of lobbying without properly disclosing lobbying activities to officials. IPVM received this complaint without knowledge of its source in August, 2021, and determined we are not required to register after a review of interactions with government officials.