

10 August 2021

Professor Fraser Sampson
Biometrics and Surveillance Camera Commissioner
2 Marsham Street, 1st Floor, Peel
London SW1P 4DF

BY EMAIL ONLY: scc@sccommissioner.gov.uk

Dear Professor Sampson

Thank you for your letter setting out your remit and how this relates to the points raised in our letter to partners. I welcome the opportunity to discuss this with you and I hope this will be the start of an ongoing dialogue.

You asked if we could from the outset explain whether we accept that crimes are being committed against Uyghurs in the Xinjiang region. As a global enterprise and manufacturer, we believe Hikvision is not a competent arbiter to decide on this matter. Moreover, it is beyond our capability to make a judgement on this matter, particularly against a backdrop where the debate surrounding the Xinjiang issue comes with clashing geopolitical views.

Addressing your corporate questions, let me reiterate that Hikvision respects human rights and takes our responsibility to protect people seriously. Hikvision fully embraces and has implemented the foundational and operational principles laid out in the U.N. Guiding Principles of Business and Human Rights.

In the company's most recent public disclosure on [Environmental, Social and Governance Report for 2020](#) published on April 28, 2021, the company confirmed the acceptance of the investigation report from world-renowned human rights expert and former US Ambassador Pierre-Richard Prosper who led an independent investigation on the company's business in Xinjiang and its human rights compliance since January 2019. **In his report, Ambassador Prosper and his team concluded that '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 wilful disregard.'**

Over the past two years, Hikvision has taken additional steps to increase transparency into our operations and governance. Since 2019, Hikvision have continuously published the ESG reports which include more information related to the company's corporate social responsibilities beyond the financial data, including a specific section on our commitments to corporate governance, compliance and human rights.

The highlights regarding our improvement on compliance program from the last reporting period also include:

- Hikvision established a Global Advisory Committee to provide the management with broader insights, independent expertise and suggestions.

- Hikvision's human rights governance and compliance system was optimized from three dimensions – product, labour, and supply chain.
- Hikvision appointed compliance liaisons in its headquarters' functional departments, businesses and branch operations at home and abroad.
- A new Technical Ethics Committee was established to put into practice the Company's understanding of "Tech for Good."
- Hikvision inserted compliance review into the APP launch process, and integrated compliance management into the key control nodes in business processes, to strengthen prior risk management and control.
- As of December 31, 2020, Hikvision had established cooperative relations with more than 1,000 suppliers worldwide, subject to the ISO 14001 Environmental Management System, the ISO 45001 International Standard for Occupational Health and Safety (OH&S) Management, and the SA8000 Social Accountability International Standard.

It is also worth stating that we do not oversee and control our devices once they are passed to installers and we have no access to our devices without users' authorisation. Operational matters are not within our remit.

Our collaboration with your predecessor was in large part about fostering trust in the surveillance industry, including Secure by Default – an initiative driven by the customer and their security. We very much look forward to building on this work and elevating cybersecurity standards across the whole industry.

We are also keen to engage in the revised code that is forthcoming. There are many challenges ahead with new technologies also presenting new issues, as well as opportunities.

It is very difficult for international corporations to publicly answer narrow pointed questions on paper. This usually leads to more questions and a kangaroo trial by media. As they say, it is better to look at all the evidence and come to a verdict rather than come to a verdict and then look for evidence.

I am sure there are many more questions resulting from our communications. So in order to answer more deeply we would be pleased to arrange a meeting with the well-known and highly respected human rights lawyer, Ambassador Pierre-Richard Prosper, the former US Ambassador at Large for War Crimes, for an in-person meeting with you, at your earliest convenience, to answer your questions and so that he can present to you his findings.

Yours sincerely,



Justin Hollis
Marketing Director – UK & Ireland