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Submission to the UN Committee on the Rights of the Child: Child Labor and Vocational School Internship Abuses in China

Network of Chinese Human Rights Defenders (CHRD) — July 28, 2026

I. Summary

> *No matter how difficult the circumstances, we must not let the children suffer, and no matter how impoverished, we must not deprive them of education.*
>
> — Xi Jinping, Chinese Communist Party General Secretary, June 2025[1]

The Network of Chinese Human Rights Defenders (CHRD) submits this report to inform the United Nations (UN) Committee on the Rights of the Child ("the Committee") about ongoing violations of children's rights in China. It focuses on two overlapping issues: abuses within mandatory vocational school internship programs affecting students under 18, and the illegal hiring of children under 16. Despite domestic legislation and the Chinese government's ratification of the Convention on the Rights of the Child (CRC) and key International Labour Organization (ILO) conventions, abuses of child labor persist across industries.

According to 2024 government statistics, about 41 million children are enrolled in secondary school, including roughly 12 million in secondary vocational schools, from which about 4 million students graduate each year.[2] CHRD reviewed 28 cases from 11 provinces between 2019 and 2025: 11 involved abuses of vocational student interns and 13 concerned the illegal hiring of children under 16; financial exploitation featured in four cases, and three students died during internships, with a fourth seriously self-harming. These findings, drawn from government penalty notices, court documents, state media, and discussions with researchers and people with direct knowledge, should be read as illustrative rather than exhaustive, given pervasive restrictions on independent documentation in China. CHRD's outreach to the three companies whose factories employed the students who died, and to several of their international clients, further found inconsistent corporate human rights due diligence. Two of the three employers did not respond at all, and client companies' awareness of their own supply-chain links to implicated suppliers varied considerably.

CHRD is an independent, nongovernmental organization that has monitored and reported on human rights in China, and advocated for human rights defenders, for over 20 years. This research was prompted by alerts from labor rights activists in China about recent deaths and injuries of minors in vocational school internships and illegal employment, and by the anticipated review of China's implementation of the Convention. It examines the extent to which

[1] "Xi's Vision," China Daily, June 1, 2025.
[2] Ministry of Education, "Statistical Bulletin on the Development of National Education in 2024," June 11, 2025.

domestic law, corporate practice, and government enforcement match China's obligations under the Convention and relevant ILO conventions.

This submission organizes findings using the Committee's cluster framework:

- **Cluster 2 – General principles** (arts. 2, 3, 6, 12): three student deaths and a serious self-harm incident illustrate failures to treat the best interests of the child as a primary consideration and to secure children's right to life, survival, and development within an institutionalized labor system.
- **Cluster 7 – Health** (arts. 6, 24, 33): warning signs of psychological distress and physical illness among student interns were ignored by teachers and factory staff across different occurrences, revealing an absence of functioning health and mental-health safeguards.
- **Cluster 9 – Children's rights and the environment** (arts. 2, 3, 6, 12, 13, 15, 17, 19, 24, 26–31): reporting channels available to student interns who experienced abuse or harassment consistently failed to produce protective intervention, reflecting a structural gap in Article 19 mechanisms.
- **Cluster 10 – Education** (arts. 28–31): mandatory internships tied to graduation, weak oversight of internship providers, and financial exploitation by schools and intermediaries show that the vocational education and training system is not being administered in the interests of students.
- **Cluster 11 – Special protection measures: economic exploitation, including child labor** (arts. 22, 30, 32–33, 35–36, 37(b)–(d), 38–40): hazardous working conditions, serious injuries, illegal employment of children under 16, and inconsistent corporate human rights due diligence demonstrate the persistence of economic exploitation of children.

Authorities have repeatedly failed to provide the comprehensive, disaggregated data on child labor that the Committee has requested since 2013, and the government's combined fifth and sixth periodic report, submitted four years late in July 2023, did not address this core request. Given the delay in China's reporting cycle and the funding constraints affecting the UN treaty body system, CHRD asks the Committee to treat these findings as factual basis to inform its official List of Issues addressing the state and engage the state during the formal review session. Detailed recommendations to Chinese authorities, international oversight bodies, businesses, and concerned governments appear in Section VIII.

II. Methodology

This report focuses on abuses experienced by vocational school students under 18 during internships and on cases in which companies hired minors under 16.[3] It draws primarily on Chinese-language media reports and legal documents covering cases since 2019,[4] supplemented by discussions with experts on child labor and vocational education, a review of the Committee's concluding observations following China's combined third and fourth periodic report, and

[3] CHRD recognizes that student interns over 18 may face similar exploitative conditions but this report examines only individuals under 18.

[4] Court verdicts, judgments and administrative decisions cited in this report were retrieved from a domestic legal database.

correspondence with three companies where student interns died and several of their international clients.

The documentation of cases is based on Chinese government penalty notices, online databases, court documents and state media reports. Authorities' imposition of penalties, and state media coverage of individual cases, can be considered limited forms of accountability.

But given that Chinese authorities often censor information, restrict independent investigations, fail to comprehensively document or publicly disclose child labor data, and punish people for reporting problems, the true magnitude of the violations described here may be considerably greater than these cases suggest. the true magnitude of the violations described here may be considerably greater than these cases suggest. The feedback from four external expert reviewers helped strengthen CHRD's findings. Individuals with direct knowledge of abuses and local labor rights advocates shared information only anonymously, fearing government reprisals — reflecting the sensitivity of speaking with international human rights organizations about children's labor rights in the current political environment. This opacity is not isolated to child labor data and reflects Beijing's broader censorship of information it views as sensitive.[5] Because reporting relies on the willingness of children or families to speak to media, or on the occasional penalty notice, the cases discussed here should be seen as illustrative, not exhaustive. Minors are identified using only partial names to protect their privacy.[6]

CHRD first published on this subject in a May 2026 report, "*Genuine Free Choice? Child Labor and Mandatory Student Internships in China*."[7]

III. Cluster 2 — General Principles: Right to Life, Survival and Development; Best Interests of the Child (arts. 2, 3, 6, 12)

Article 3 of the CRC requires that "the best interests of the child shall be a primary consideration" in all actions concerning children, and Article 6 recognizes every child's inherent right to life and requires States parties to "ensure to the maximum extent possible the child's survival and development." Article 12 further requires that children capable of forming their own views be assured of the right to express those views freely, with due weight given according to age and maturity, in all matters affecting them. CHRD's findings show that the institutional design of mandatory vocational internships — which ties a passing evaluation to graduation and discourages early withdrawal — created conditions in which four children died or seriously harmed themselves, without any discernible accompanying mechanism adequate to protect their survival, development, or right to be heard.

Between 2020 and 2023, three vocational students died — two by suicide and one from a lack of timely medical care — while on internships assigned by their schools, and a fourth swallowed batteries reportedly in an apparent attempt to escape an internship. In each case, the student or their family raised concerns beforehand: a 16-year-old surnamed Li told his parents he was

[5] CHRD, *Zero Tolerance for Human Rights Defenders in the Year of Zero COVID* (2022).
[6] Minors in this report are identified using only partial names (surnames) to protect their privacy.
[7] Access to the full report: https://www.nchrd.org/wp-content/uploads/2026/05/Genuine-Free-Choice_CHRD-May-21-2026.pdf.

exhausted from night shifts before his death by suicide in September 2020;[8] a 17-year-old surnamed Yu asked to be transferred to a day shift and was refused before his death by suicide in June 2021;[9] a 17-year-old surnamed Yang was refused sick leave three times before dying of respiratory failure in February 2022;[10] and a 17-year-old surnamed Li ingested batteries in March 2023 after a party secretary at his school instructed a teacher not to let distressed interns return home, warning it would "trigger mass resignations."[11] Full descriptions of these cases appear in Section IV, which addresses the health dimensions of these cases.

None of these children's expressed wishes were given appropriate weight, in violation of Article 12. Signed internship or "commitment" documents in at least one case pre-emptively assigned to the child and family "personal" responsibility for self-harm or suicide during the internship — language that suggests institutions anticipated such risks and sought to insulate themselves from liability rather than build protective safeguards.[12] This is inconsistent with the best-interests principle in Article 3 and with States parties' obligation under Article 6 to ensure children's survival and development, particularly given that these harms occurred within a state-sanctioned, graduation-linked internship system rather than through informal illegal employment alone.

CHRD urges the Committee to ask the government, via the Committee's List of Issues and during the formal review session, what independent, child-centered mechanisms exist to assess and act upon the best interests and expressed wishes of student interns, and what accountability has followed in the four cases above.

IV. Cluster 7 — Health: Mental Health (arts. 6, 24, 33)

Article 24 recognizes "the right of the child to the enjoyment of the highest attainable standard of health," including access to care for both physical and mental health. CHRD's cases reveal a pattern in which supervising teachers and factory management did not recognize or respond to signs of psychological distress or illness among student interns, despite repeated opportunities to intervene.

Li, a 16-year-old electrical engineering student from Shandong Province, interned at Hengyuan Machinery Manufacturing's factory in Kunshan, Jiangsu Province, from June 2020, working up to 11 hours daily on alternating day and night shifts.[13] After Li complained to his parents of exhaustion, his parents contacted a supervising teacher, who urged them to have Li persist so he could "choose a good job."[14] Li died by suicide on September 30, 2020, the same day a teacher had called his parents to say he was "throwing a tantrum" and should be picked up.[15] The school reportedly paid the family an undisclosed compensation sum and asked them not to discuss the matter publicly.[16]

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[8] Yin Hawiye, "Behind a Vocational School Student's Death from a Fall," China Youth Daily, Nov. 4, 2020.
[9] China Labor Watch, "17 Years Old Intern Fell to His Death," July 8, 2021; Lam Tsz Ying, HK01, July 7, 2021.
[10] Shen Du, Feng Xinyi, Toutiao News, March 18, 2022; Shi Wei, Cover News/The Paper, March 19, 2022.
[11] Wang Xin, "Student Ingests Two Batteries After Internship Stress," The Paper, March 23, 2023.
[12] Shi Wei, Cover News/The Paper, March 19, 2022 (letter of commitment signed by student Yang and school).
[13] Yin Haiyue, China Youth Daily, Nov. 4, 2020.
[14] Yin Haiyue, China Youth Daily, Nov. 4, 2020.
[15] Yin Haiyue, China Youth Daily, Nov. 4, 2020.
[16] Yin Haiyue, China Youth Daily, Nov. 4, 2020.

Yu, a 17-year-old computer science student from Hubei Province, interned over 1,300 kilometers from home at Wellop Technology in Shenzhen, working more than 10 hours daily on consecutive night shifts.[17] Some parents had raised safety concerns before the internship began, but the school teacher warned that the students would not receive diplomas without participating in the internship.[18] Students who dozed off during shifts were publicly shamed in an online group chat;[19] when Yu's eyeglasses broke at work, his supervisor taped the frame to his head and told him to continue, and Yu was later marked absent without permission for seeking a replacement, prompting a warning that he could be expelled.[20] He died by suicide two days later, on June 25, 2021 — 15 days into his internship.[21] Yu's parents learned of his death from calls by the hospital and police the same day; after rushing to Shenzhen, they were required to take COVID-19 tests and wait for results before entering the morgue. They did not see their son's body until two days later, during which no one from the factory provided information about what had happened.[22] Police reportedly instructed factory staff and security guards to delete any photographs taken at the scene, and students were told not to discuss the death; no further investigation or disciplinary action was reported.[23]

Yang, a 17-year-old nursing student from Yunnan Province, began an internship in January 2022 at an electronics factory in Jiangxi Province alongside more than 100 fellow students from his school, and was assigned 12-hour shifts, including nights, with breaks only when approved by his line manager.[24] In late January or early February, Yang and a fellow intern asked their supervising teacher to switch to day shifts, but the teacher refused; over the following days the factory denied Yang sick leave three times, and when a manager finally took him to a clinic on February 10, it had already closed, so Yang returned to his dormitory without care.[25] The next morning, a fellow intern found Yang in bed with blood in his vomit; he was rushed to the hospital but died of respiratory failure that afternoon.[26] News coverage of Yang's death referenced two documents he had signed — a three-party internship agreement and a separate "letter of commitment" with the school — the latter including clauses stating that if the student engaged in "jumping from buildings, self-harm, or suicide" during the internship this would be considered "personal behavior" for which the student and parents were responsible, and that if the student had an undisclosed underlying health condition, "including mental illness, depression, etc.," and left the internship without informing teachers, the student and parents would bear full responsibility.[27] That the school's own paperwork explicitly anticipated suicide, self-harm and mental illness — while assigning liability to the child and family rather than

[17] China Labor Watch, July 8, 2021.
[18] Ningmeng Minqi, NetEase, July 8, 2021.
[19] Lam Tsz Ying, HK01, July 7, 2021.
[20] Lam Tsz Ying, HK01, July 7, 2021.
[21] China Labor Watch, July 8, 2021.
[22] China Digital Times, "A Migrant Worker Father's Poetic Plea After His 17-Year-Old Son's Suicide," June 29, 2021.
[23] Huang Xiaoshan/Cheng Wen, Radio Free Asia, June 29, 2021.
[24] Shen Du, Feng Xinyi, Toutiao News, March 18, 2022.
[25] Shi Wei, Cover News/The Paper, March 19, 2022.
[26] Shi Wei, Cover News/The Paper, March 19, 2022.
[27] Shi Wei, Cover News/The Paper, March 19, 2022.

establishing safeguards — suggests institutional awareness of these risks well before Yang's death, in apparent tension with Article 13 of the Internship Regulations.

A fourth student, a 17-year-old accounting major surnamed Li from Sichuan Province, began an internship in January 2023 at a data-processing company in Suzhou, Jiangsu Province, whose relevance to his studies was unclear and which imposed daily phone-call quotas, with pay deductions for missed targets or customer complaints, over a planned five-month term.[28] In early March, Li approached a supervising teacher about leaving the internship and returning to school; the teacher showed him a message the school's party secretary had sent in mid-February instructing staff: "Don't readily allow student interns to return to school, as this will make them highly unstable and trigger mass resignations with students fleeing back home." After that conversation, Li and fellow students stopped reporting to work, hoping to be dismissed from the internship; on March 7, 2023, Li swallowed two AAA batteries, which required surgery to remove part of his small intestine.[29]

It is possible that factors beyond the internships contributed to these deaths and to the self-harm described above. Yet in each of the four cases, the student or their family raised a concern — exhaustion, a request to change shifts, repeated denial of sick leave, or distress at being unable to leave — that went unaddressed by the adults responsible for the child's welfare. These four cases show that neither supervising teachers nor factory management provided or facilitated psychological support, and in each case adults minimized or dismissed clear warning signs, prioritizing the completion of the internship over the student's stated condition. Article 13 of China's Regulations on the Management of Vocational School Student Internships requires schools and internship providers to jointly establish safety protocols and emergency-response mechanisms, and Article 23 mandates daily monitoring of interns' condition and requires that significant issues be "reported immediately without delay, concealment, or omission"[30] — obligations that were not met in practice in the four cases described here.

CHRD recommends the Committee ask the government what steps it has taken to require pre-placement psychological screening, accessible and confidential channels for interns to report distress, and mandatory intervention protocols independent of the school administrations that also oversee the students' graduation.

V. Cluster 10 — Education, Leisure and Cultural Activities: Vocational Training and Guidance (arts. 28–31)

Domestic legal framework

Multiple Chinese laws regulate and prohibit child labor. Article 15 of the Labor Law and Article 61 of the Law on the Protection of Minors prohibit employing minors under 16; Article 61 also bars entertainment venues, bars, and internet cafés from hiring anyone under 18.[31] The Labor Law defines "juvenile workers" as those aged 16–18 and requires the state to protect them from

[28] Wang Xin, The Paper, March 23, 2023.
[29] Wang Xin, The Paper, March 23, 2023.
[30] Regulations on the Management of Vocational School Student Internships, arts. 13, 23 (Dec. 31, 2021revision).
[31] Labor Law, art. 15; Law on the Protection of Minors, art. 61.

"poisonous or harmful" work, such as mining or repeatedly carrying loads over 20 kg.[32] The Provisions on the Prohibition of Using Child Labor require employers to verify workers' ages before hiring and to terminate and pay fines immediately upon discovering child labor.[33] The Special Provisions on Labor Protection of Juvenile Workers separately bar exposure to toxic substances, extreme temperatures, radiation, and explosive environments, and to heavy lifting, mining, forestry, and dangerous outdoor work.[34]

Enforcement authority is dispersed: the Law on the Protection of Minors empowers culture, tourism, human resources, and market-supervision departments to issue warnings, confiscate illegal income, and fine employers up to RMB 100,000 (USD 14,037), rising to RMB 1 million for serious or repeated violations; no disaggregated data on enforcement under this law is publicly available.[35] Under the Provisions on the Prohibition of Using Child Labor, county-level and higher labor and social security departments supervise enforcement; the standard fine for employing a child under 16 is RMB 5,000 (USD 700) per person per month, and a labor dispatch agency that arranges such work risks losing its license.[36] Under the Criminal Law, employing children under 16 in physically demanding, high-risk, or hazardous environments — including underground work or toxic, explosive, or flammable materials — can carry sentences up to three years, or three to seven years in particularly serious cases.[37] In one 2019 judgment CHRD reviewed, a Beijing court sentenced two managers of a sand-washing factory to three and four years' imprisonment after a 14-year-old employee fell to his death.[38]

Mandatory internships are a core component of China's vocational education system: the Ministry of Education has for decades encouraged school-enterprise cooperation,[39] and under the Regulations on the Management of Vocational School Student Internships (Hereafter "The Internship Regulations," 2016), internship performance is recorded in students' academic evaluation and students who fail their internships are not eligible to graduate. The regulations were amended in 2021; Article 27 provides that internship performance is included in students' academic evaluation and serves as an "important basis for graduation." Although the amended wording removes the explicit rule that failing an internship precludes graduation, internships remain an integral component of the vocational curriculum. In practice, vocational schools continue to treat successful completion of internships as a necessary requirement for graduation.[40]

The Internship Regulations require the placements to align with students' fields of study, prohibit assigning only repetitive tasks, cap the length at roughly six months, and require agreements covering hours, pay (at least 80% of standard wages of equivalent roles), housing, safety and

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[32] Labor Law, arts. 58, 64.
[33] Provisions on the Prohibition of Using Child Labor, arts. 3, 4.
[34] Special Provisions on Labor Protection of Juvenile Workers, art. 3.
[35] Law on the Protection of Minors, art. 125.
[36] Provisions on the Prohibition of Using Child Labor, arts. 6, 7, 10.
[37] Criminal Law, art. 244-1.
[38] Beijing No. 2 Intermediate Court judgment, 2019, Docket (2019) Jing 02 Xing Zhong No. 151.
[39] Ministry of Education, "Opinions on Further Strengthening the Role of Industries and Enterprises in Vocational Education and Training," Dec. 2, 2002.
40 Viola Zhou and Caiwei Chen, "China's AI boom depends on an army of exploited student interns," September 14, 2023.

dispute terms.[41] Schools and companies are prohibited from using intermediary labor dispatch agencies to arrange internships and from assigning first-year students or those under 16.[42]

Education departments of governments at all levels, from township to provincial, lead the overall coordination mechanism for internship management and conduct supervision (Article 42). Market regulation departments at all local levels are responsible for incorporating internship violations into their inspection, reflecting violations on the company's compliance record (Article 44).

Article 46 describes punishment for schools that violate the regulations, though specific penalties are not clearly articulated. Instead, the Internship Regulations refer to enforcement under existing legal frameworks, including the Education Law, the Vocational Education Law, and the aforementioned Provisions on the Prohibition of Using Child Labor. The Education Law does not set out specific penalty provisions relating to vocational school internships.

Under the Vocational Education Law, competent education administrative authorities—including those at the national, provincial, municipal, and county levels—may suspend student enrollment at vocational schools or revoke a school's operating license where violations result in serious consequences (Article 65), although the threshold for such penalties is not clearly defined.[43]

Article 28 of the CRC recognizes the right of the child to education, and Article 29 requires that education be directed to the fullest development of the child's personality and abilities. The Committee's 2013 concluding observations urged China to collect and publicly release disaggregated data on hazardous child labor and working conditions and to ensure children over 16 in labor are there through "genuine free choice" with adequate safeguards.[44] China's combined fifth and sixth periodic report, submitted in 2023, did not address this central request, instead reiterating existing legal prohibitions without relevant data.[45]

Financial exploitation through school-arranged internships

CHRD documented four cases in which schools or intermediaries extracted "commissions" from internship wages, despite explicit legal prohibitions. In the case of one intern who died by suicide, Li, his family was unaware that a signed internship agreement existed, and a contract obtained from another intern at the same factory did not specify wages and lacked the school's official stamp.[46] At a factory hosting Zhengzhou Software Application Secondary Vocational School interns, the factory reportedly paid RMB 25 (USD 3.60) per hour but the school passed on only RMB 16 (USD 2.30) — withholding roughly 36 percent.[47] In Sichuan, a school's legal representative, Liu Hui, arranged internships — including for students under 16 — through labor dispatch agencies and received RMB 904,818 (USD 125,660) as "management fees" in her

[41] Internship Regulations, arts. 12, 15–18.
[42] Internship Regulations, arts. 11, 12, 16.
[43] Vocational Education Law was adopted by the National People's Congress on May 15, 1996, and the current version of the law has been in effect since May 1, 2022.
[44] Concluding Observations, 2013, CRC/C/CHN/CO/3-4, paras. 85(a), 86(b)-(c).
[45] China's Combined Fifth and Sixth Periodic Report, CRC/C/CHN/5-6, submitted July 21, 2023.
[46] Yin Haiyue, China Youth Daily, Nov. 4, 2020.
[47] Dian Keji, QQ, Oct. 30, 2023.

personal bank account since 2016 before being charged in 2020. The first-instance court sentenced Liu to three years in prison, suspended for four years, for accepting bribes as a non-state functionary, and ordered her to return the illicit income. Liu appealed, and the court overturned the ruling for insufficient evidence and ordered a retrial. It is unclear whether a retrial has taken place.[48]

In Yunnan, a school reportedly told a factory it would forward RMB 23 (USD 3.30) per hour to students but paid only RMB 14 (USD 2), retaining the balance as recorded "profit" in an internal spreadsheet; the school dismissed the report as fabricated when contacted by journalists.[49] An interviewed labor-dispatch representative described the underlying scheme: factories short on manpower pay dispatch agencies roughly RMB 25 (USD 3.60) per worker per hour; agencies pass on about RMB 22 (USD 3.20) to schools; and schools pay students only around RMB 15 (USD 2.20), retaining the RMB 7 (USD 1) difference as commission. By this account, a school sending 300 students to work 10-hour days for a month could earn roughly RMB 630,000 (USD 87,000) in commissions alone.[50] Such arrangements, if proven, would violate Articles 16 and 20 of the Internship Regulations; those bar schools and providers from using intermediary agencies to arrange internships, and from allowing internships to become a source of profit rather than education.

Inappropriate placements

Placements unrelated or poorly matched to a student's field of study also exposed children to harm outside the labor-safety context. A 17-year-old hairdressing student surnamed Tang, placed at a spa in Chongqing during a school-arranged internship in July 2023, was initially assigned to wash clients' hair but was later required to bathe and massage male customers in ways that included touching their genitals.[51] Tang made several attempts to report the assignment to her two supervising teachers and to a manager at the spa; both teachers acknowledged her complaint but did not intervene, and the manager responded, according to a screenshot Tang shared with a news outlet: "You can quit if you don't want to work here," and "Or you can choose to call the police."[52] Tang's mother subsequently filed a police report; the outcome of any investigation remains unreported. This placement — assigning a minor to duties involving physical contact with adult strangers, with no functioning reporting channel that produced protective action — also implicates the state's obligation under Article 19 to build effective mechanisms for identifying and responding to abuse of children in institutional settings, not merely the education-specific standards addressed in this cluster.[53]

CHRD asks the Committee to inquire of the government how it monitors whether internship placements genuinely serve students' vocational and educational development as required by the

[48] Verdict, Xuzhou District Court, Yibin City, Sichuan Province, June 29, 2020, Docket (2020) Chuan 1521 Xing Chu No. 53.
[49] Elephant News, Sohu, April 12, 2024.
[50] Fortnightly Talk, Zhihu, April 14, 2022.

[51] Xie Yinzong, The Paper, Sept. 20, 2023.
[52] Xie Yinzong, The Paper, Sept. 20, 2023.
[53] CRC, art. 19.

Internship Regulations, and what independent channels exist for students and parents to report financial or other misconduct without jeopardizing their progress towards graduation.

VI. Cluster 9 — Children's Rights and the Environment: Protection from Violence and Abuse (arts. 2, 3, 6, 12, 13, 15, 17, 19, 24, 26–31)

This cluster addresses the cross-cutting environment in which children exercise their rights, including protection from violence and abuse under Article 19 of the CRC, which requires States parties to take all appropriate measures to "protect children from physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse," while in the care of any person responsible for them, and to build effective procedures for "identification, reporting, referral, investigation, treatment and follow-up."[54]

The case of Tang, the 17-year-old hairdressing student required to bathe and massage male clients in ways that included inappropriate touching (detailed in Section V), illustrates a broader gap in this protective architecture. Tang raised her concerns through the channels available to her — two supervising teachers and the spa's manager — and all three failed to act. This is precisely the kind of institutional failure Article 19 is meant to prevent: the existence of a reporting channel is not, by itself, a "procedure for identification, reporting, referral, investigation, treatment and follow-up" if the adults receiving reports have neither the authority nor the incentive to intervene. The same pattern occurs in the internship deaths discussed in Sections III and IV: teachers and factory staff who received direct complaints or observed clear distress did not escalate them to anyone capable of changing the child's circumstances.

CHRD did not find any independent body in China empowered to receive and act on reports of abuse or exploitation of vocational student interns without involving the same school administration responsible for the placement — a structural gap that Article 19 obligations would require the government to close. CHRD encourages the Committee to ask the government what independent, child-accessible reporting and referral mechanisms exist for interns experiencing abuse, harassment, or exploitation during a placement, and what training and mandate supervising teachers and school officials receive to identify and refer such reports rather than manage them internally.

VII. Cluster 11 — Special Protection Measures: Economic Exploitation, Including Child Labor (arts. 22, 30, 32–33, 35–36, 37(b)–(d), 38–40)

Article 32 recognizes a child's right to protection from economic exploitation and from work likely to be hazardous, to interfere with education, or to harm health or development, and requires States parties to set minimum ages, regulate hours and conditions, and establish effective penalties.[55] Read together with Article 19's requirement that states build functioning systems to identify, report, investigate, and follow up on child maltreatment,[56] these provisions require not merely legislating against exploitation but also building and enforcing comprehensive monitoring and remedy systems.

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[54] CRC, art. 19.
[55] CRC, art. 32.
[56] CRC, art. 19.

China ratified the Convention in 1992 and, as a State party, is required to submit an initial report within two years of ratification and periodic reports every five years thereafter; it submitted reports in 1996, 2005, and a combined third and fourth report in 2013, before its combined fifth and sixth report submitted in July 2023 —a deviation from the five-year schedule.[57] Following its 2013 review of China's combined third and fourth periodic report, the Committee urged the government to review its state secrecy laws to ensure transparency of information concerning children, to collect and publicly release data on hazardous child labor and working conditions disaggregated by age, sex, location and socioeconomic background, to identify and prohibit employment of 16–18 year-olds in arduous work, and to ensure that children over 16 who work do so through "genuine free choice," with adequate safeguards against forced recruitment.[58] China's combined fifth and sixth periodic report did not address the core request for disaggregated data; it pointed only to the existence of the Law on the Protection of Minors, asserted without supporting evidence that inspections and penalties had been strengthened, and referenced a complaints hotline without disclosing complaint numbers or outcomes.[59] China has not extended an invitation to the Committee to conduct a country visit.[60] China's four-year delay in reporting, compounded by funding constraints across the UN human rights system, has pushed back the timing of the next review.[61]

China has separately ratified 28 International Organization conventions.[62] The ILO defines child labor as work that deprives children of their childhood, potential, and dignity, and is harmful to physical and mental development — including work that deprives children of schooling, forces them to leave school prematurely, or requires combining school with excessively long or heavy work.[63] Convention No. 138 on Minimum Age, ratified in 1999, requires states to set a national minimum working age, identify and prohibit hazardous occupations for under-18s, and enforce these limits through inspection and updated legislation.[64] Convention No. 182, ratified in 2002, obliges states to eliminate the worst forms of child labor, including slavery, debt bondage, forced labor, and work likely to harm a child's health, safety or morals, and specifically to provide direct assistance for removing children from such labor and for their rehabilitation.[65] In June 2025, the ILO Committee of Experts (CEACR) again reported that China had not disclosed statistical data on the number, nature, or trends of child labor, and "noted with regret" that the government again did not provide requested information on inspections of schools and internship entities or their findings — a continuation of gaps first flagged in the CEACR's 2021 observations on China's compliance.[66] The ILO has maintained a presence in China since 1985; its current Decent Work Country Programme (2023–2027) itself acknowledges "gaps remaining in laws and enforcement" compared with international labor conventions, despite the pre-existing

[57] CRC, adopted by UN General Assembly resolution 44/25, Nov. 20, 1989; China signed 1990, ratified 1992.
[58] Concluding Observations, Committee on the Rights of the Child, 2013, CRC/C/CHN/CO/3-4, paras. 85(a), 86(b)-(c).
[59] China's Combined Fifth and Sixth Periodic Report, CRC/C/CHN/5-6, submitted July 21, 2023.
[60] Committee on the Rights of the Child, standard working methods on country engagement.
[61] *Budget battles at the UN*, International Service for Human Rights, October 2025.
[62] ILO NORMLEX, China country profile.
[63] ILO, "What is child labour."
[64] ILO, "Convention 138 – Minimum Age," NORMLEX.
[65] ILO, "Convention 182 – Worst Forms of Child Labour," NORMLEX, art. 7(b).
[66] CEACR, Report of the Committee of Experts (2025), pp. 508–510.

domestic prohibitions on child labor and other abuses described above.[67] The persistence of these acknowledged gaps, across both the CRC and ILO reporting tracks, underscores that the shortfall lies less in the text of China's domestic law than in its enforcement, data disclosure, and independent verification.

Hazardous conditions and injuries

Beyond the health and education dimensions addressed above, several cases illustrate direct physical harm from hazardous work. A 13-year-old surnamed Shan, tasked with moving goods and cutting thread ends at a garment factory in Yutian County, Hebei Province in July 2022, earned RMB 6 (under USD 1) per hour across shifts from 7:30 a.m. to 7:00 p.m. A fall at the factory left him with fractured toes requiring skin-graft surgery, and his family's civil suit resulted in a court ruling that the factory's employment of an underage worker was illegal, though the documents CHRD reviewed did not specify any accompanying penalty.[68] A 17-year-old surnamed Hu, studying electromechanical equipment maintenance, interned at a Dongguan electronics factory over 1,200 km from his Guizhou school, where he was assigned to operate a hydraulic press on the production line; the machine crushed his right hand, severely injuring three fingers, and he spent 93 days in hospital followed by two further months of rest and ongoing rehabilitation. A court ordered the factory and his school jointly liable for damages covering medical and nursing costs, disability compensation, emotional distress, and lost internship income.[69] Two Henan students, 16-year-old Liu and 17-year-old Wang, began an internship at a medical equipment company in November 2021; Wang, despite holding no forklift license, was tasked with driving one daily. In December 2021, the forklift struck a cement block while Liu stood on its front, throwing him off and crushing him; he suffered severe lacerations, open fractures, and nerve and vascular damage to his left foot, requiring 124 days of hospitalization in 2022 and a further 34 days of treatment the following year. A court again ordered the company and school jointly liable for medical, nursing, disability, and emotional-distress damages.[70]

Excessive hours appear to be common. In November 2019, a group of 17-year-old students from a Chongqing vocational school began an internship over 1,300 km away in Shenzhen, working from 8:30 a.m. until 10–11 p.m. for over two weeks without days off; students were reportedly told that returning to school before completing the internship would mean expulsion and termination.[71] The internship continued into February 2020, when, amid the Lunar New Year holiday and the height of the COVID-19 outbreak, the student interns and several hundred other workers were gathered in a parking lot and pressed to sign a "voluntary return to work" waiver, with a factory representative warning: "If you don't sign, don't expect to be able to enter your dorms or get anything handled later." A signed agreement showed a monthly wage of RMB 3,500 (USD 495), while a handwritten note from an intern recorded varying, lower monthly

[67] ILO, "Decent Work Country Programme for China 2023–2027" (2023), p. 16.
[68] Verdict, Yutian County Court, Hebei Province, Feb. 28, 2023, Docket (2022) Ji 0229 Min Chu No. 4161.
[69] Verdict, Chenzhou City Intermediate Court, Hunan Province, June 23, 2021, Docket 2021 Xiang 10 Min Zhong No. 1340.

[70] Verdict, Xinxiang Intermediate Court, Henan Province, Aug. 27, 2024, Docket (2024) Yu 07 Min Zhong No. 3412.
[71] Spicy Pepper Tribe, Ifeng News, Feb. 1, 2020.

payments of RMB 1,026–2,455 (USD 170–347).[72] Over 200 early-childhood-education students, some under 18, from a Henan vocational school were sent to assemble laptops at a Jiangsu factory nearly 1,000 km away in 2023, working shifts from 8 p.m. to 8 a.m.; students said their supervising teacher confiscated their identification cards in the name of safekeeping, complicating any attempt to leave.[73] The same year, over 180 students from a different Henan school interned at a Guangdong electronics factory over 1,300 km away, working 11-hour days on assembly lines.[74]

Illegal employment of children under 16

Administrative penalty records document continued illegal hiring of children under 16 across manufacturing, entertainment, hospitality, and service sectors. The information below should be considered illustrative, not exhaustive, as violations typically surface only when penalties happen to be disclosed.

Employer	Province	Sector	Fine	Year
Jinjiang Wuli Chungeng Sole Processing Factory[75]	Fujian	Shoe sole processing	RMB 50,000 (USD 6,960)	2019
Penglaigong Entertainment; No. 1 Mansion Entertainment[76]	Anhui	Entertainment	RMB 5,000 (USD 700) each	2023
Shenzhen Qianxin Labor Dispatch[77]	Guangdong	Labor dispatch	RMB 5,000 (USD 700)	2024
Liangxin Electronics; Changfu Labor Dispatch; Hongtu Enterprise Management[78]	Guangdong	Electronics; labor dispatch	RMB 20,000–25,000 (USD 2,810–3,510)	2024
Xinle Entertainment Center[79]	Guangdong	Entertainment	RMB 15,000 (USD 2,110)	2024
Nanning Xinglianhe Human Resources Service[80]	Guangdong	Labor dispatch	RMB 20,000 (USD 2,810)	2024
Muxing Culture and Communication[81]	Liaoning	Culture	RMB 5,000 (USD 700)	2024
Godzilla Song and Dance Entertainment Hall[82]	Yunnan	Entertainment	RMB 5,000 (USD 700)	2025

[72] Spicy Pepper Tribe, Ifeng News, Feb. 1, 2020.
[73] Nan'er Loves Traveling, Sohu, July 3, 2023.
[74] Dian Keji, QQ, Oct. 30, 2023.
[75] Administrative decision, Jinjiang City Court, Fujian Province, Sept. 23, 2020, Docket (2020) Min 0582 Xing Shen No. 230.
[76] Beijing Youth Paper, QQ, April 22, 2023.
[77] Bao'an District Government website (baoan.gov.cn), archived screenshot.
[78] Huang Fangfang, Southern Metropolis Daily, May 15, 2024.
[79] Li Xiumin, Sohu, Oct. 10, 2024.
[80] Huang Jingkui, Southern Metropolis Daily/QQ, Feb. 26, 2025.
[81] Shenyang City Government notice, April 8, 2025.
[82] Fugong County Government website (fugong.gov.cn), archived screenshot.

Employer	Province	Sector	Fine	Year
Xiangyang Jichen Fengjia Barbecue Restaurant[83]	Hubei	Restaurant	RMB 10,000 (USD 1,400)	2025
Shenyang Likun Media[84]	Liaoning	Culture	RMB 5,000 (USD 700)	2025
Lebei Foot Bath Center[85]	Guangdong	Massage parlor	RMB 20,000 (USD 2,930)	2025
Hongsen Processing Factory (unlicensed)[86]	Guangdong	Manufacturing	RMB 30,000 (USD 4,400)	2025

In July 2024 alone, authorities in Dongguan, Guangdong Province, issued 59 administrative penalties, 39 of which concerned child labor, with fines of RMB 5,000–40,000 (USD 700–5,500), primarily in labor-intensive manufacturing such as electronics processing, plastics, and paper packaging; 13 of the 39 penalized entities were labor dispatch agencies.[87] Many violations involved short-term employment lasting only days or weeks, suggesting reliance on temporary or informal hiring that is harder to detect, and the recurrence of labor dispatch agencies across cases highlights how intermediaries facilitate underage recruitment within fragmented subcontracting arrangements. Penalty notices often disclose little about the nature of the work performed or the circumstances of hiring, limiting assessment of the broader conditions involved.

A 2016 academic paper analyzing 2010 government survey data found that 7.8% of children aged 10–15 were engaged in child labor — defined as paid work outside the household, agricultural work for the household, or work in family businesses — concentrated in poorer households, rural areas, and less developed regions, reflecting structural economic inequalities across the country.[88] Working children spent an average of 6.75 hours daily on economic activity, often while still attending school; the 2010 wave remains the only one with comparable time-use data, since later waves did not include equivalent questions, making it difficult to determine whether children's working time has since increased or decreased.[89] The ILO and UNICEF note that most child labor occurs in the informal economy, particularly small enterprises and family-based activities where regulation is limited,[90] and research on migrant informal workers in China similarly finds child labor concentrated in micro-enterprises and subcontracted arrangements with limited regulatory compliance, complicating efforts to track its full extent.[91] Taken together with the administrative penalty patterns above, this suggests that

[83] Xiangyang City Government website (rsj.xiangyang.gov.cn), archived screenshot.
[84] Shenyang City Government notice, Nov. 6, 2025.
[85] Kaiping City Government notice, July 31, 2025.
[86] Dongguan City Government notice, Dec. 26, 2025.
[87] Huang Fangfang, Xue Rubin, Southern Metropolis Daily/QQ, July 25, 2024.
[88] Can Tang, Liqiu Zhao, and Zhong Zhao, Child Labor in China, IZA Discussion Paper No. 9976 (Bonn: Institute for the Study of Labor, 2016), pp. 1–2.
[89] Can Tang, Liqiu Zhao, Zhong Zhao, *Child Labor in China*, IZA Discussion Paper No. 9976 (2016), pp. 1–2; Can Tang and Zhong Zhao, *Informal Institution Meets Child Development: Clan Culture and Child Labor in China*, China Economic Review, Vol. 77 (2023), p. 7.
[90] ILO and UNICEF, *Child Labour: Global Estimates 2020, Trends and the Road Forward* (2021), p. 38.
[91] Gengzhi Huang, Bowei Cai, Shuyi Liu, Desheng Xue, "Analyzing the Heterogeneity in Working Conditions of Migrant Informal Workers in China," *Humanities and Social Sciences Communications* 11 (2024).

formal enforcement actions capture only a fraction of the child labor that structural and informal economic pressures—and poor legal enforcement—continue to generate.

Corporate human rights due diligence

Companies operating in China face growing pressure from consumers, investors and regulators to adopt Environmental, Social and Governance (ESG) commitments.[92] Under the 2011 UN Guiding Principles on Business and Human Rights, businesses should seek to prevent or mitigate adverse human rights impacts that are directly linked to their operations — including through suppliers — even where they have not contributed to those impacts, and should conduct regular human rights due diligence across their operations and supply chains.[93] In January 2026, CHRD wrote to the three companies at whose factories the students described in this submission died, and copied a number of their listed international clients, asking about internal investigations, working conditions and supervision for the interns involved, disciplinary or corrective action taken, subsequent policy changes, and current auditing and due-diligence practices regarding minors.[94]

Hengyuan Machinery Manufacturing, the automotive-parts and hydraulic-components manufacturer where Li died in September 2020, publishes no labor policies on its website and did not respond to CHRD's letter.[95] Of the foreign clients listed on its website, Thyssenkrupp replied that the circumstances described were, irrespective of their specific classification, "deeply concerning," and that it had established the referenced company was or is part of its supply chain and had initiated an internal, risk-based review.[96] ZF's first reply said its compliance team took the report seriously and would review the facts, with feedback expected within three months; a second reply a month later stated that its assessment had confirmed ZF "does not maintain any direct or active business relationship with the supplier referenced" and that it was closing the case.[97]

Wong's International Holdings, the Hong Kong-listed parent company of Wellop Technology, where Yu died in June 2021, lists a range of major international brands as customers across industrial equipment, imaging technology, and household appliances sectors on its website.[98] It states in an undated ESG statement that occupational safety and employee health are its foremost consideration and that its labor regulations adhere to local laws "against employment of children and forced labor," overseen by an unspecified "Environment, Health and Safety Committee."[99] In its reply, the company did not name Yu but referred to "the tragic incident in 2021," stated that press reports "were not accurate" without identifying the inaccuracies, said PRC privacy law prevented it from sharing further information, and stated only that "appropriate measures" were

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[92] UN Environment Programme Finance Initiative, "China embarks on a journey of ESG disclosure: 2024 progress and focus for 2025," Jan. 7, 2025.
[93] OHCHR, UN Guiding Principles on Business and Human Rights, endorsed by Human Rights Council resolution 17/4, June 16, 2011.
[94] Letters from CHRD to Hengyuan Machinery Manufacturing, Wong's International Holdings, and Longcheer Technology, Jan. 12, 2026 (correspondence in Appendixes A, B and C).
[95] Hengyuan Machinery Manufacturing, "Our Customers," retrieved Nov. 1, 2025.
[96] Thyssenkrupp reply to CHRD, Jan. 29, 2026.
[97] ZF replies to CHRD, Jan. 15 and Feb. 16, 2026.
[98] Wong's International Holdings, "Our Customers," undated, retrieved Nov. 1, 2025.
[99] Wong's International Holdings, "ESG Statement," undated, retrieved Dec. 3, 2025.

taken "in accordance with the opinions of the relevant local authorities," without elaborating.[100] On ESG policy, the company said it complies with requirements applicable to Hong Kong-listed companies generally, without specifying what policies apply at its mainland facilities.[101] Of the foreign clients CHRD copied, GE Appliances first stated it did "not conduct business with Wellop" and had no record of doing so; when CHRD pointed to GE's listing as a "customer" on Wong's International's own website, GE Appliances clarified that it does business with a different Wong's subsidiary, which it said had passed an on-site ethical-sourcing audit in 2025, and that its supplier agreements prohibit subcontracting without consent.[102] Bosch and ABB each replied that they took the matter seriously and would look into it, with ABB detailing its adherence to the UN Guiding Principles, the OECD Guidelines, and ILO core conventions;[103] Centrica sent an automated acknowledgment.[104]

Longcheer Technology, the Shanghai-listed electronics supplier where Yang died in February 2022, reported revenue of RMB 11.42 billion (USD 1.58 billion) for the quarter ending September 30, 2025, and sells components to major domestic and international smartphone and electronics brands.[105] It did not respond to CHRD's letter.[106] Its 2023 ESG report states that it follows the Provisions on Prohibition of Child Labor and conducts "daily management" under related internal rules, and that in the event of inadvertent child-labor recruitment it would immediately stop the work, return the child to guardians, and investigate responsible staff; the report states no child-labor incidents were found that year.[107] Its 2024 report and an August 2024 human rights policy add references to remediation procedures and a recruitment-stage compliance system, again reporting no incidents found.[108] No equivalent public policy exists for the period before 2023 — it remains uncertain whether any policy was in place when Yang died in 2022.

Taken together, these responses show inconsistent corporate diligence: two of the three primary employers did not respond at all; one replied without specifics; and clients' awareness of supply-chain links to the implicated factories varied. None of the three primary employers provided the operational safeguards, investigation findings, or policy changes CHRD inquired. Where ESG or human-rights policies exist at all, they were in each case adopted or substantially elaborated only after the death in question, and none of the three companies' public disclosures specify what independent verification, if any, confirms that their stated commitments are implemented at the factory level.

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[100] Wong's International Holdings reply to CHRD, Feb. 6, 2026.
[101] Wong's International Holdings reply to CHRD, Feb. 6, 2026.
[102] GE Appliances replies to CHRD, Jan. 27 and Feb. 2, 2026.
[103] Bosch reply to CHRD, Jan. 29, 2026; ABB reply to CHRD, Jan. 30, 2026.
[104] Centrica automated reply to CHRD, Jan. 12, 2026.
[105] Stock Analysis, "Shanghai Longcheer Technology revenue, quarter ending September 30, 2025," retrieved Dec. 3, 2025.
[106] CHRD letter to Longcheer Technology, Jan. 12, 2026; no reply received as of publication.
[107] Longcheer, "2023 Environmental, Social and Governance Reports," retrieved Nov. 1, 2025, p. 42.
[108] Longcheer, "2024 Environmental, Social and Governance Reports," retrieved Nov. 1, 2025, pp. 49–50; Longcheer Human Rights Policy, Aug. 8, 2024.

VIII. Recommendations

The findings in Sections III–VII point to a structural problem: an internship system formally embedded in vocational education, but administered with graduation leverage over students, weak independent oversight, fragmented enforcement across agencies, and no accessible reporting channel outside the institutions responsible for the placement. Correcting this requires action at each level — legal design, school administration, corporate due diligence, and international monitoring — set out below.

Without sustained international scrutiny and enforcement of China's existing obligations under domestic and international law, children across the country remain at risk of the harms documented in this submission — a gap between rhetoric and practice that runs contrary to the aspirations for children's welfare that Chinese leadership itself has articulated.

In line with these obligations and aspirations, CHRD urges the Committee on the Rights of the Child to:

- During its upcoming review of China's combined fifth and sixth periodic report, ensure the List of Issues requests updated, disaggregated statistics on incidences of hazardous child labor, to enable effective monitoring of the government's obligations under the Convention.
  - As part of the same review, request that the government detail its strategy and framework for implementing the National Program for Child Development (NPCD) 2021–2030 at provincial, city and county levels, including priorities, objectives, assigned responsibilities, and monitoring and evaluation mechanisms, consistent with the Committee's 2013 recommendations on the preceding 2011–2020 NPCD.
  - During the interactive dialogue and in preparing Concluding Observations, publicly note if such information has not been provided.

CHRD also puts forward the following recommendations to other relevant stakeholders for the Committee's reference in preparing its List of Issues and Concluding Observations:

To the Chinese government (State Council):

- Direct the Ministry of Education and relevant authorities to instruct vocational schools to immediately suspend internships as a graduation or diploma requirement until children's rights protections in these programs can be guaranteed; in the interim, ensure internships serve students' educational benefit, are genuinely voluntary, and that alternative pathways to graduation exist for students who do not participate.
- Make information and data on child labor across the country publicly available, consistent with the Committee's 2013 recommendations, including by publicizing the methodologies used for data collection and ensuring the data are released on a regular basis.
- Make public the data on child labor complaints received through the national hotline 12333, as referenced in China's combined fifth and sixth report on CRC implementation, to increase transparency around how complaints are handled.

- Direct the Ministry of Human Resources and Social Security to systematically publish inspection findings on hazardous child labor and working conditions from labor inspections conducted at county, city, and provincial levels.
- Direct the Ministry of Human Resources and Social Security to investigate labor dispatch agencies that unlawfully broker student interns to companies, in violation of the Internship Regulations, and assess stronger measures, including larger fines.
- Engage the Committee and the ILO through formal country visits to swiftly ensure full implementation of China's obligations under the international conventions to which it is a party.

To the Ministry of Education:

- Enhance supervision of vocational schools' enforcement of the Internship Regulations' provisions establishing shared school and provider responsibility for interns' physical and mental health, and strengthen preventive measures to include health and psychological assessment before placement.
- Improve redress mechanisms for school-arranged internships by establishing reporting channels independent of school administrations; students currently have reason to fear that reporting abuse, or withdrawing from an internship, will jeopardize their ability to graduate, while teachers face institutional pressure to prioritize internship management over student wellbeing.
- Ensure vocational schools raise awareness among students and parents or legal guardians of their rights under domestic law, the Internship Regulations, and international children's rights standards, including through workshops involving legal experts and labor inspectors that use real cases to explain students' rights and how to report abuse; schools should report back to education authorities and to families on implementation and any challenges encountered.

To the International Labour Organization:

- Use Committee of Experts on the Application of Conventions and Recommendations (CEACR) observations to intensify scrutiny of China's compliance with ratified conventions, including by drawing attention to deficiencies in reporting, continued hazardous working conditions, and violations in vocational internship programs, while issuing targeted requests for information and increasing pressure where non-compliance persists.
- Incorporate concrete, measurable objectives for eliminating child labor violations into the ongoing Decent Work Country Programme, using administrative penalty records as one basis for monitoring and accountability, and coordinate with the Committee on the Rights of the Child to avoid duplicative but uncoordinated requests for the same underlying data.

To domestic and foreign companies operating in China:

- Using the UN Guiding Principles as the standard, map operations and supply chains to identify child labor risks, adopt clear policies prohibiting child labor, and regularly monitor suppliers; companies with existing processes should strengthen them and publicize their findings.

- Conduct an internal audit of internship recruitment practices to identify any involvement of labor dispatch agencies, and promptly terminate arrangements inconsistent with the Regulations on the Management of Vocational School Student Internships.
- Seek direct partnerships with vocational schools to provide substantial, relevant internship opportunities, and explore alternative approaches to manpower needs that do not rely on unlawful dispatch arrangements.

To concerned governments:

- Review whether companies based in their jurisdiction have links, through investment or partnership, to facilities that employ children under 16 or run abusive internship programs, and urge those firms to suspend commercial engagement until abuses are fully remedied and safeguards implemented.
- Include child labor protection clauses in future trade and bilateral agreements with China, requiring regular compliance reporting on the implementation of child labor laws and CRC/ILO obligations, with clear enforcement mechanisms and penalties for systematic violations.
- Call on the Chinese government to allow independent monitoring mechanisms — including UN bodies, labor organizations, and civil society groups — to rigorously assess child labor practices and the implementation of child protection commitments.
- Support a special session at the UN Human Rights Council and a standing mandate to address the Chinese government's human rights record, including abuses connected to child labor, consistent with the calls made by dozens of UN human rights experts in June 2020 and June 2022.

Appendixes

The emails below are presented in edited form, with personal contact details removed for privacy reasons. The timestamps and content of the emails remain unchanged.

Appendix A: CHRD's inquiry to Hengyuan Machinery Manufacturing

Subject: CHRD 关于李某在恒源昆山工厂死亡的查询
Date: 2026-01-12 14:43
From: CHRD
To: Hengyuan Machinery Manufacturing

January 12, 2026

Mr. Wu Jianhua
Legal representative and Executive Director
No. 666 Jiande Road, Zhangpu Town, Kunshan City, Suzhou, Jiangsu Province, China

Re: Circumstances surrounding the death of student intern Li at Hengyuan Machinery Manufacturing's factory in Kunshan
Dear Mr. Wu,

A Chinese-language translation of this letter follows the English version. (本信后附中文译本，供参考。)

The Network of Chinese Human Rights Defenders (CHRD) is an independent, nongovernmental organization that monitors human rights in China. We have been reporting on and advocating for human rights defenders for 20 years.

We are currently researching labor practices involving underage workers, including vocational school students under 18 years old at factories or in other work environments, in China. The research includes gathering and assessing information on whether and how companies have complied with domestic law and their own policies, including safeguards related to student internships, and fulfilled their obligations to protect workers' rights according to international human rights standards.

CHRD understands from Chinese-language news coverage that in June 2020, Li Zhicai, a 16-year-old vocational school student from Shandong Province, interned at Hengyuan Machinery Manufacturing's factory in Kunshan City, Suzhou, Jiangsu Province. Li died by suicide at his dormitory at the factory on September 30, 2020.

We further understand from the same sources that Li and fellow student interns worked over 11 hours a day, including night shifts, and that Li's complaints in July and August 2020 about the poor conditions and exhaustion from work were not addressed.

In the interest of thorough and accurate reporting, we are writing to request further information

and other perspectives you may have about Li's internship and death, and your company's policies. We would appreciate your response to the following questions:

Can you confirm these facts about Li's death in 2020 at your factory? If so, can you provide details about any internal investigations conducted regarding his internship and his death?

Can you provide documentation of working conditions, hours, and supervision for Li and other underage interns at your factory in Kunshan?

What, if any disciplinary or corrective actions were taken against relevant personnel in your company regarding Li's death?

Have there been any policy changes or operational reforms regarding student internships implemented at Hengyuan Machinery Manufacturing and its factories following Li's death?

What auditing and monitoring systems are currently in place to ensure compliance with child labor prohibitions and working-hour limitations?

Do you have any policies and procedures in place to evaluate your labor practices in light of human rights standards, including International Labour Organization standards and the Convention on the Rights of the Child? If so, can you provide details?

Does your company conduct regular due diligence to determine whether there might be any adverse human rights impacts for workers under 18 years old at your factories? If so, can you provide details? Does your company continue to accept students through vocational internship programs?

To be able to reflect your response in our forthcoming publication, we would welcome a response to these questions and any other comments you may have by January 30, 2026. Thank you for your assistance in these matters.

Sincerely,

Dr. Sophie Richardson
Co-Executive Director
Network of Chinese Human Rights Defenders

Cc: Beijing West Industries; Chassis Brakes International (Hitachi Astemo); Continental AG; GF Casting Solutions (Georg Fischer AG); Magna International; ThyssenKrupp Group; Wandu Korea Automotive Parts; Wanxiang; ZF Friedrichshafen AG.

2026 年 1 月 12 日

吴建华先生 法定代表人兼执行董事

中国江苏省苏州市昆山市张浦镇建德路 666 号

关于学生实习生李某在恒源精密机械制造昆山工厂死亡的相关情况

尊敬的吴先生:

中国人权捍卫者网络(CHRD)是一个独立的非政府组织,致力于监督中国的人权状况。二十年来,我们一直在报道和倡导人权捍卫者的权益。

我们目前正在研究涉及未成年工人的劳动实践,包括中国工厂或其他工作环境中 18 岁以下的职业学校学生。该研究包括收集和评估信息,以了解企业是否以及如何遵守国内法律和自身政策(包括关于学生实习的保障措施),并根据国际人权标准履行保护工人权利的义务。

根据中文新闻报道,CHRD 了解到,2020 年 6 月,来自山东省的 16 岁职业学校学生李致材在江苏省昆山市恒源精密机械制造工厂实习。2020 年 9 月 30 日,李某在该工厂宿舍自杀身亡。

我们从相同来源了解到,李某和其他学生实习生每天工作超过 11 小时,包括夜班,而且李某在 2020 年 7 月和 8 月对恶劣的工作条件和工作疲惫的投诉未得到处理。

为了进行全面准确的报道,我们致函贵公司,希望获取有关李某实习和死亡以及贵公司政策的进一步信息。我们希望您能回答以下问题:

您能否确认关于李某 2020 年在贵厂死亡的事实?如果可以,您能否提供有关其实习和死亡的任何内部调查的详细信息?

您能否提供李某和其他未成年实习生在昆山工厂的工作条件、工作时间和监督管理的文件记录?

针对李某的死亡,贵公司是否对相关人员采取了任何纪律或纠正措施?

李某死亡后,恒源精密机械制造及其工厂是否实施了关于学生实习的任何政策变更或运营改革?

目前有哪些查核和监督系统来确保遵守童工禁令和工作时间限制?

贵公司是否制定了任何政策和程序,以根据人权标准(包括国际劳工组织标准和《儿童权利公约》)评估劳动实践?如果有,能否提供详细信息?

贵公司是否定期进行尽职调查,以识别和评估 18 岁以下工人可能面临的人权风险? 如有,能否提供详细信息?另外,贵公司是否继续通过职业学校实习计划接收学生到厂内工作?

为了能够在我们即将发布的出版物中反映您的回复,我们希望在 2026 年 1 月 30 日之前收到您对这些问题的答复以及您可能提供的任何其他意见。感谢您在这些事务上提供的协助。

此致 敬礼

副本：京西重工、德国蒂森克虏伯集团、万向钱潮股份有限公司、采埃孚天合、泛博制动部件有限公司、万都韩国汽车零部件有限公司、德国大陆集团、乔治费歇尔金属成型科技、麦格纳汽车系统。

Thyssenkrupp's reply to CHRD inquiry

Subject: AW: Your message to us | AW: CHRD 关于李某在恒源昆山工厂死亡的查询
Date: 2026-01-29 04:28
From: Thyssenkrupp
To: CHRD

Dear Dr. Richardson,

Thank you for your letter of 12 January 2026 and for the information you have shared.

The circumstances described in your letter are, irrespective of their specific classification, deeply concerning. We regret when people come to harm and we take indications of potential misconduct seriously.

At this stage, we do not have any reliable information beyond what is set out in your letter. We are therefore not in a position to verify the assertions made or to comment on individual circumstances. We have, however, established that the company you refer to is/was part of our supply chain, and we are reviewing the matter accordingly.

Independently of this, we expect our business partners to comply with applicable laws and with recognized international labour and human rights standards. This expectation is reflected in our Supplier Code of Conduct.

We have initiated an internal, risk-based review and will assess the situation further and will consider any appropriate next steps as further verifiable information becomes available.

Yours sincerely,
thyssenkrupp Automotive Technology

ZF's first reply to CHRD inquiry

Subject: AW: CHRD 关于李某在恒源昆山工厂死亡的查询
Date: 2026-01-15 08:37
From: ZF
To: CHRD

Dear reporter,

Thank you for your report. ZF Compliance takes all incoming reports seriously and examines them carefully. The facts you have described will be reviewed. You will receive feedback from us within 3 months. In the course of review, we may ask you further questions should we need additional information. Therefore, please check your protected mailbox/emails for any messages. Thank you very much for your support.

Yours sincerely
Your ZF Compliance Team

ZF's second reply to CHRD inquiry

Subject: Case No. 3322 - AW: CHRD 关于李某在恒源昆山工厂死亡的查询
Date: 2026-02-16 04:42
From: ZF
To: CHRD; Hengyuan Machinery Manufacturing
Cc: ZF

Dear Sophie Richardson,

Thank you for your report. The assessment confirmed that ZF does not maintain any direct or active business relationship with the supplier referenced in the alert.

Therefore, we will close the case.

Beste regards,
ZF Corporate Compliance

Appendix B: CHRD's inquiry to Wong's International Holdings

CHRD wrote to Wong's International Holdings, the parent company of Wellop Technology (Shenzhen) Limited, for this inquiry, as Wellop does not appear to have a dedicated website or available email address.

Subject: CHRD requests for information regarding June 2021 intern fatality at Wellop Technology (Shenzhen) Limited
Date: 2026-01-12 14:47
From: CHRD
To: Wong's International Holdings

January 12, 2026
Mr. Wong Chung Mat
Chairman and CEO, Wong's International Holdings Limited

17/F, C-Bons International Center, No. 108 Wai Yip Street, Kwun Tong, Kowloon, Hong Kong

Re: Circumstances surrounding the death of student intern Yu at Wellop Technology (Shenzhen) Limited

Dear Chairman Wong,

The Network of Chinese Human Rights Defenders (CHRD) is an independent, nongovernmental organization that monitors human rights in China. We have been reporting on and advocating for human rights defenders for 20 years.

We are currently researching labor practices involving underage workers, including vocational school students under 18 years old at factories or in other work environments, in China. The research includes gathering and assessing information on whether and how companies have complied with domestic law and their own ESG commitments, including human rights policies, and fulfilled their obligations to protect workers' rights according to international human rights standards.

CHRD understands from Chinese-language news coverage that in June 2021, Yu Ming, a 17-year-old vocational school student from Hubei Province, interned at Wellop Technology (Shenzhen) Limited, a subsidiary of Wong's International Holdings. Yu died by suicide at his dormitory at Wellop's factory in Shenzhen on June 25, 2021.

We further understand from the same sources that Yu and fellow student interns worked over 10 hours a day, including night shifts, and that when Yu's eyeglasses broke during work, his supervisor required him to continue working rather than permitting him to leave to replace them.

In the interest of thorough and accurate reporting, we are writing to request further information and other perspectives you may have about Yu's internship and death, and your company's policies. We would appreciate your response to the following questions:

Can you confirm these facts about Yu's death in 2021 at Wellop Technology (Shenzhen) Limited? If so, can you provide details about any internal investigation conducted regarding his internship and his death?

Can you provide documentation of working conditions, hours, and supervision for Yu and other underage interns at Wellop Technology in 2021?

What, if any disciplinary or corrective actions were taken against personnel in your company regarding Yu's death?

Yu's internship appears to contradict the stated commitments in your company's Environmental, Social and Governance (ESG) statement, which emphasizes a priority on occupational safety and employee health, and labor laws including those against employment of children. How does your company reconcile these obligations with vocational internships?

Have there been any policy changes or operational reforms regarding student internships implemented at Wellop Technology and other subsidiaries following Yu's death?

What auditing and monitoring systems are currently in place to ensure compliance with child labor prohibitions and working hour limitations?

Do you have any policies and procedures in place to evaluate your labor practices in light of human rights standards, including International labor Organization standards and the Convention on the Rights of the Child? If so, can you provide details?

Does your company conduct regular due diligence to determine whether there might be any adverse human rights impacts for workers under 18 years old at your factories? If so, can you provide details? Additionally, does your company continue to accept students through vocational internship programs?

To be able to reflect your response in our forthcoming publication, we would welcome a response to these questions and any other comments you may have by January 30, 2026. Thank you for your assistance in these matters.

Sincerely,
Dr. Sophie Richardson
Co-Executive Director
Network of Chinese Human Rights Defenders

Cc: ABB Motion; Centrica Hive; Envision Energy; Bosch Global; General Electric Appliances; Honeywell International.

Wong's International Holdings' reply to CHRD inquiry

Subject: RE: CHRD requests for information regarding June 2021 intern fatality at Wellop Technology (Shenzhen) Limited

Date: 2026-02-06 07:33
From: Wong's International Holdings
To: CHRD

Dear Dr. Richardson

We refer to your email of 12 January 2026 which has been passed to the undersigned.

With regard to your first question, the facts set out in your email are similar to press reports published shortly after the tragic incident in 2021. Those press reports were not accurate. After the incident, the local police and labor administrative departments launched an investigation immediately. We suggest you get in touch with them if you wish to know more.

We are advised that the issues involve the privacy of the employee and his family and therefore we cannot disclose to you according to PRC law.
As for the follow-up handling of the incident, the company involved took appropriate measures in response to the incident in accordance with the opinions of the relevant local authorities.

With regard to your other questions, we are listed in Hong Kong and, in that capacity, comply with regulations regarding our ESG and other policies applicable to all companies listed in Hong Kong. To the extent required, these are available on our website or on the website of the Hong Kong Stock Exchange and are covered in our Annual Reports available on those websites.

Best regards,
Wong's International Holdings Ltd.

GE Appliances' first response to CHRD inquiry:

Subject: RE: [EXT] CHRD requests for information regarding June 2021 > intern fatality at Wellop Technology (Shenzhen) Limited
Date: 2026-01-27 09:10
From: GE Appliances
To: CHRD

Dr. Sophie Richardson,

GE Appliances was copied on the information request regarding Wellop Technology (Shenzhen) Limited. Please note that GE Appliances does not conduct business with Wellop Technology Limited, and we have no record of ever having done so.

Regards,
GE Appliances Ombuds Team

CHRD replied to GE Appliances:

From: CHRD
Sent: Wednesday, January 28, 2026 8:08 AM
To: GE Appliances
Subject: Re: [EXT] CHRD requests for information regarding June 2021 intern fatality at Wellop Technology (Shenzhen) Limited

Dear GE Appliances Ombuds Team,

Thank you for your response.

We copied you on our email regarding Wellop Technology (Shenzhen) Limited because, on the website (https://www.wih.com.hk/customers.html) of its parent company, Wong's International, GE Appliances is listed as a customer. This creates a discrepancy between your position and the supplier's own public representations.

Given the seriousness of the student intern's death as described in our letter, we would appreciate clarification on the following:

- Whether any steps will be taken to verify that there has been no direct or indirect business relationship (including through subsidiaries, intermediaries, or subcontracting arrangements); and

- Whether your company will contact Wong's International to request the removal or correction of this reference.

We raise this in the interest of accuracy and responsible due diligence, and we would welcome any further information you are able to share.

Sincerely,
Sophie Richardson

GE Appliances' second response to CHRD inquiry:

Subject: RE: [EXT] CHRD requests for information regarding June 2021 intern fatality at Wellop Technology (Shenzhen) Limited
Date: 2026-02-02 15:44
From: GE Appliances Ombuds Team
To: CHRD

Dr. Sophie Richardson,

Thank you for your reply. To clarify, there is no discrepancy between the company's position and Wong International's public representations. We do not conduct business with Wellop Technology (Shenzhen) Limited, the subject of your inquiry. GE Appliances does conduct business with Wong's International through a different subsidiary. Our supplier agreements prohibit subcontracting without prior written consent. We have no record of ever having done business with Wellop Technology, either directly or indirectly through subcontracting.

For the Wong's International subsidiary with which we conduct business, they are contractually required to comply with GE Appliances' Supplier Integrity Guidelines, including standards related to fair employment practices, safety, and human rights (attached). Our suppliers are subject to periodic audits conducted by our Ethical Sourcing team to confirm compliance with these standards. The Wong's International subsidiary with which we conduct business successfully passed an on-site Ethical Sourcing audit in 2025.
GE Appliances is committed to the highest standards of integrity and ethical sourcing. Because the incident CHRD is investigating did not occur at a facility operated by one of our suppliers, we do not have a basis to provide further information regarding this matter.

Regards,
GE Appliances Ombuds Team

Bosch's response to CHRD Inquiry

Subject: RE: CHRD requests for information regarding June 2021 intern fatality at Wellop Technology (Shenzhen) Limited
Date: 2026-01-29 05:08
From: Bosch
To: CHRD

Dear Mrs. Richardson,

Thank you for your email.
We take the information seriously and will take it up.
With kind regards,

Your Sustainability Team at Bosch

ABB's response to CHRD Inquiry

Subject: Re: CHRD requests for information regarding June 2021 intern fatality at Wellop Technology (Shenzhen) Limited
Date: 2026-01-30 13:02
From: ABB
To: CHRD
Dear Dr. Richardson,

Thank you for including us in your correspondence with Wong's

International Holdings Limited.

ABB is committed to the highest standards of business ethics and integrity. We support and respect the principles contained within:

1. the International Bill of Human Rights
2. the United Nations' Guiding Principles on Business and Human Rights
3. the OECD Guidelines for Multinational Enterprises
4. the International Labor Organization (ILO) Core Conventions on Labor Standards
5. and other applicable laws and principles

ABB's ambition is for human rights to be well understood, managed along the entire value chain, and integrated into ABB's daily business.

Alongside the ABB Code of Conduct [1] and the ABB Supplier Code of Conduct [2] and its implementation Guidance, the ABB Human Rights Policy [3] formalizes ABB's commitment and expectations to respecting human rights and describes ABB's approach to human rights due diligence. We expect our suppliers to respect the same international human rights principles and standards: this includes specific restrictions on child labor, modern slavery, human trafficking and fair labor conditions (including overtime), requirements for human rights due diligence, and traceability systems to monitor risks related to human rights and labor rights.

We appreciate being notified of this matter, which we are considering as part of our human rights due diligence approach.

Best regards,
ABB

Auto-reply from Centrica

Subject: Email Confirmation from Centrica GBS Operations
Date: 2026-01-12 14:49
From: Centrica
To: CHRD

Thank you for your email. We will respond to your query shortly.

If you are a former employee (or referencing agent) and wish to contact Centrica Human Resources for any of the specific reasons below, please select from the following email options to raise a case with the relevant team […].

Appendix C: CHRD's inquiry to Longcheer Technology

Subject: CHRD request for information regarding 2022 intern fatality at Nanchang Longcheer Technology
Date: 2026-01-12 14:52
From: CHRD
To: Longcheer Technology

January 12, 2026
Mr. Du Junhong
Founder and Chairman of the Board, Longcheer Technology Co., Ltd.
Building 1, 401 Cabio Road, Xuhui District, Shanghai, People's Republic of China

Re: Circumstances surrounding the death of student intern Yang at Longcheer Technology factory in Nanchang

Dear Chairman Du,

The Network of Chinese Human Rights Defenders (CHRD) is an independent, nongovernmental organization that monitors human rights in China. We have been reporting on and advocating for human rights defenders for over 20 years.

We are currently researching labor practices involving underage workers, including vocational school students under 18 years old at factories or in other work environments, in China. The research includes gathering and assessing information on whether and how companies have complied with domestic law and their own ESG commitments, including human rights policies, and fulfilled their obligations to protect workers' rights according to international human rights standards.

CHRD understands from Chinese-language news coverage that a 17-year-old vocational school student surnamed Yang, from Yunnan Province, began an internship at your company's factory in Nanchang, Jiangxi Province in January 2022. During the internship, Yang fell ill and could not get prompt medical care; he died on February 11, 2022.

We further understand from the same sources that Yang and fellow student interns were working 12-hour shifts on an assembly line, including night shifts, and could only take breaks when those were approved by their line manager.

In the interest of thorough and accurate reporting, we are writing to request further information and other perspectives you may have about Yang's internship and death, and your company's policies. We would appreciate your response to the following questions:

Can you confirm these facts regarding Yang's internship and death in 2022 at your Nanchang facility? If so, can you provide details about any internal investigation conducted?

Can you provide a timeline of events leading to Yang's death, including when medical

intervention was requested and when it was provided?

Can you provide documentation of working conditions, hours, and supervision for Yang and other student interns at your Jiangxi factory in 2022?

What disciplinary or corrective actions were taken in your company in relation to Yang's internship or death?

Have there been any policy changes or operational reforms implemented at Longcheer Technology and its factories following Yang's death?

Your company website provides ESG reports for 2023 and 2024, and a Human Rights Policy dated August 8, 2024. Can you please clarify your pre-2023 policies to evaluate your labor practices in light of local labor laws and regulations and international human rights standards? How does your company reconcile these obligations with vocational internships?

Do you have any policies and procedures in place to evaluate your labor practices in light of human rights standards, including International Laboure Organization standards and the Convention on the Rights of the Child? If so, can you provide details of those policies?

Did your company conduct any due diligence to determine whether there might be any adverse human rights impacts from employing workers under 18 years old at your factories? If so, can you provide details? Additionally, does your company continue to accept students through vocational internship programs?

To be able to reflect your response in our forthcoming publication, we would welcome a response to these questions and any other comments you may have by January 30, 2026. Thank you for your assistance in these matters.

Sincerely,
Dr. Sophie Richardson
Co-Executive Director
Network of Chinese Human Rights Defenders

Cc: Honor; Lenovo; Oppo; Samsung; Vivo; Xiaomi.