

An aerial, high-angle photograph of a large textile factory floor. The scene is filled with rows of sewing machines and workers. The workers are seen from above, some standing and some sitting at their workstations. The floor is a light-colored, polished surface. The overall atmosphere is one of a busy, industrial environment. The text 'ANNUAL REPORT 2025' is overlaid in the top left corner, and 'II TRANSPARENTEM' is overlaid in the bottom left corner.

ANNUAL REPORT 2025

II TRANSPARENTEM

LETTER FROM THE EXECUTIVE DIRECTOR

As I marked 25 years working on labor rights in global supply chains last year, I found myself reflecting on what has changed—and what has not. There has been progress, but it has been incremental, uneven, and usually not sustained. Remedy too often addresses the symptoms of exploitation rather than the root causes of poverty wages, lack of freedom of association, and widespread discrimination. For workers facing exploitation, that is simply not good enough.

My commitment to ensure we don't settle for anything less than real change is what brought me to Transparentem.

My connection to this work is deeply personal. I began my career as a community-based journalist reporting on unfair working conditions faced by migrant workers along the Northern California coastline. Those investigations exposed abuses that ultimately led to regulatory reforms for agricultural workers and stronger protections for seasonal employees. The experience grounded my belief that bringing injustices to light can catalyze change. Transparentem carries that same principle forward on a global scale.

I am honored to lead Transparentem, taking the baton from founder E. Benjamin Skinner. Over the past decade, Ben has built an organization defined by rigor, independence, and courage—one that investigates labor abuses with depth and precision, calls them out, and engages companies and other actors to drive meaningful reform. Transparentem has shown that irrefutable evidence based on direct worker testimony, combined with strategic corporate engagement, can in fact move systems that appeared intractable.

From the outside, I had long admired the organization's influence. What I did not fully appreciate until I arrived was the remarkable community behind it: an exceptional team, an

engaged board, and partners and supporters around the world with whom we work every day.

The impacts Transparentem had just this last year are outlined in this 2025 annual report—millions of dollars of returned recruitment fees to workers, systems change in Taiwan, industry-level efforts in India, new depths of engagement with investors, and our first work in critical minerals.

It is clear that I have joined Transparentem at a pivotal moment. There is both more headwind than ever before and yet also windows of opportunity that we must not let pass.

In many countries, governments are unable—or unwilling—to enforce the law. As a result, corporate exploitation continues without consequence while worker organizations and civil society are marginalized. At the same time, we are seeing an increase in global attention on forced labor. Enforcement of US forced labor import bans is increasing, the European Union's Forced Labor Regulation will take effect in 2027, and there is greater attention on forced labor in global trade agreements. For companies and their investors, allowing human and environmental abuses to persist in the making of their products creates not only reputational risks, but increasingly financial and legal risks. It is up to organizations like Transparentem to ensure we use these levers of power to drive measurable change in workers' lives.

As we enter our second decade, we are developing a strategic plan that will guide our work through 2030. Our focus is clear: where can we have the greatest impact on the most entrenched forms of labor exploitation—and how do we scale that impact? The real measure is not what we reveal, but what changes because of it.

That is the standard Transparentem has set over its first decade—and the one I intend to raise in the years ahead.

Thank you for your ongoing partnership in this essential work,



Tara Winter
Executive Director



ABOUT US

Transparentem transforms industries by allying with workers and communities to uncover abuses in global supply chains and drive labor and environmental justice. We envision a sustainable world that is just and equitable for all workers and their communities.

Around the world, millions of workers, children, and communities face serious harm in the making of everyday consumer goods. Abuse persists even where companies pledge to act responsibly, because the mechanisms meant to catch problems too often miss what's actually happening in factories and on farms.

Transparentem partners directly with workers and communities to uncover abuses that otherwise rarely come to light. We bring first-hand testimony and actionable evidence into boardrooms and turn it into accountability. By engaging companies, investors, governments, and media, we create pressure from multiple directions: companies face financial, regulatory, and reputational incentives to clean up their supply chains; governments face pressure to enforce existing laws or pass new ones. The result is direct relief for workers, children, and their communities—and lasting change across industries.

OUR WORK IN 2025

2025 was a year of impact. Investigations that began with worker testimony translated into millions of dollars of recruitment fees returned, children back in school, formal government probes, and trade-level consequences for companies that ignored forced labor risks. Our work this year proved what's possible when evidence meets sustained pressure.

Each project follows the same logic: go where oversight ends, document what's happening, and use that evidence to compel action—from the factory floor to corporate offices to the halls of government.

TRANSLATING WORKER TESTIMONY INTO REFORM IN TAIWAN

When migrant workers arrived in Taiwan to work in factories supplying global brands, many reported paying thousands of dollars to secure their jobs. In addition, many described paying labor brokers ongoing “service fees” and, in certain cases, reported that their passports were retained and their movements restricted. These practices often lead to debt bondage and extreme vulnerability.

In 2024, Transparentem investigated Taiwan’s textile, appliance, and electronics manufacturing sectors and translated worker testimony into evidence and recommendations for global buyers and policymakers.

In 2025, we publicly disclosed our work via two reports, [Following the Thread: Abuses in Taiwan’s Textile Industry](#) and [The Price of Work: A Brief on Widespread Migrant](#)

[Worker Recruitment Fees in Taiwan’s Manufacturing Sectors](#), moving further toward worker remedy and structural reform.

What we found. Across both projects, we documented how migrant workers paid fees of up to \$6,000 to secure their jobs, along with ongoing “service fees” to labor brokers worth two to three months’ wages. Workers also reported indicators of forced labor including passport confiscation, restrictions on movement, excessive overtime, and abusive living and working conditions. These abuses were occurring at manufacturers supplying major global brands across the apparel, technology, appliance, electronics, and beverage industries.

What followed. Using worker testimony and evidence gathered at worksites, Transparentem engaged more than 60 connected companies. This led to companies conducting independent audits, which found that workers were owed more than \$8 million. To date, this work has catalyzed \$7.8 million in recruitment fee reimbursements paid out or committed to migrant workers, addressing potential debt bondage and increasing workers’ financial security. Three of four manufacturers where migrant workers were paying ongoing fees to labor brokers have eliminated that practice.

Several suppliers have committed to repay by specific dates and have begun doing so with contributions from major brands. At least three suppliers and their buyers have yet to commit to full repayment and the repayment schedule outlined by other suppliers is much too long. We continue to press for complete and swift repayment for all eligible workers.

IMPACT AT A GLANCE

\$7.8M returned or committed to migrant workers in Taiwan

67 documented abuses addressed at the supplier level

30 companies signed on to an industry-wide initiative

52 companies and 32 investors taking action on forced labor

20 civil society organizations engaged across projects

What's changing. More than 50 brands and 21 civil society organizations **issued joint letters** to the Taiwanese government urging them to strengthen legal protections for migrant workers. A multi stakeholder group of investors reinforced those calls **in a separate letter**, increasing pressure for reform across corporate and financial actors. The Taiwan Textile Federation (TTF) **released recommendations** urging Taiwanese textile mills to adopt responsible recruitment and employment practices, a significant step toward industry-wide reform.

Patagonia noted that our “research has made it clear that **collective action is necessary** and has mobilized the industry in the right direction.”

The Taiwanese government has since indicated that new regulatory measures to better protect migrant workers are forthcoming and has taken steps to incorporate these new protections into law and trade agreements. And in a significant step toward institutional accountability, Taiwan's top government watchdog, Control Yuan, **launched a formal probe** into forced labor in the textile industry following our report.

The implications of this work now extend to global trade. In early 2026, Taiwan and the United States advanced a new trade framework that includes commitments related to combating forced labor

and addressing practices such as worker-paid recruitment fees and the retention of identity documents. These commitments address the types of abuses documented in our investigations.

At the same time, the United States has stepped up enforcement of Section 307 of the Tariff Act, a longstanding U.S. law that prohibits the import of goods made with forced labor. Under this authority, U.S. Customs can detain or block shipments at the border. Section 307 was enforced in Taiwan in 2025, against a bicycle manufacturer, underscoring that forced labor risks now carry real trade consequences for companies operating there.

Taken together, these developments mark a broader shift: exploitative labor practices are no longer treated solely as workplace compliance issues, but as risks that can trigger regulatory action, trade disruption, and national-level reform.

The Taiwan case reflects our theory of change in action: pairing direct worker testimony and evidence with a balance of pressure, partnership, and technical assistance can advance lasting protections and economic justice for workers.

What's needed. All textile suppliers in Taiwan must commit to TTF's Employer Pays Principle, which holds that no worker should ever bear the cost of getting a job. That principle must also become Taiwanese law, adopted and enforced across all manufacturing sectors, not just textiles. Global buyers have a parallel obligation: due diligence cannot stop at tier one. Companies must ensure the Employer Pays Principle runs through their full supply chains—and that the suppliers and labor brokers they work with are held to the same standard.





PARTNER HIGHLIGHT: SERVE THE PEOPLE ASSOCIATION

When migrant workers in Taiwan face crushing recruitment fees, withheld wages, and other labor abuses, local advocates are often their first and only line of support. One of the most trusted among them is **Serve the People Association (SPA)**, a Taoyuan City-based labor rights organization that has stood alongside migrant workers for more than 15 years.

Founded in 2008, SPA provides critical support to migrant workers, many from Vietnam, Thailand, Indonesia, and the Philippines. The organization operates three emergency shelters and offers legal assistance, help filing complaints, medical referrals, emergency resettlement services, and support in collecting unpaid wages.

During Transparentem's investigation into labor abuses affecting foreign migrant workers in Taiwan, SPA and its Director of Migrant Worker Policy, Lennon Wang, were essential partners. With more than 14 years at SPA and a

background in union organizing, Lennon brought deep expertise on the systemic challenges migrant workers face. His guidance helped shape our investigative approach and informed our recommendations to government and industry actors.

SPA and Lennon remained a close partner throughout the advocacy phase of the project. SPA was among the civil society organizations that joined Transparentem in meetings with Taiwan's National Human Rights Commission and Ministry of Labor, calling for stronger legislative protections and enforcement actions to protect migrant workers in Taiwan. In November 2025, Lennon participated in a virtual roundtable hosted by Transparentem, the Fair Labor Association, the American Apparel and Footwear Association, and the Taiwan Textile Federation, where he spoke to Taiwanese textile companies about best practices for the ethical hiring of foreign migrant workers.

EXPOSING CHILD LABOR AND FORCED LABOR ON COTTON FARMS IN INDIA

In Madhya Pradesh, India, Transparentem traced cotton from 90 farms with evidence of abuse to over 60 consumer-facing global apparel brands. Through more than 250 worker interviews, we uncovered conditions that are still all too common at the raw material level of global supply chains. In early 2025, we published a report with our findings, **From Field to Fabric: Enhancing Due Diligence in Cotton Supply Chains**.

What we found. Workers were earning wages well below both the legal minimum and a living wage. We documented debt bondage and other forced labor indicators, alongside abusive working conditions. Children as young as six years old were working in the fields, in some cases not attending school at all. Both adults and children were handling or exposed to toxic pesticides.

What followed. We engaged three major Indian cotton suppliers and more than 50 global brands connected to the investigated farms. Most companies had not previously traced their supply chains to the cotton farm level. More than half of the brands joined collaborative working groups to deepen their understanding of those supply chains and support remediation.

What's changing. A community-based development and human rights project has been launched across 32 villages in Madhya Pradesh, covering approximately 7,500 farms. Twenty-seven companies have come together to support **Harvesting the Future—Cotton in India** (HTF), a Fair Labor Association-led initiative to address child labor, strengthen worker protections, and build community-level support systems across the cotton supply chain.

One and a half years into a planned three-year program, measurable progress is visible. MV Foundation, an Indian organization, is implementing child-labor-free zones in the project area. So far, more than 120 children have been re-

enrolled in school, with systems in place to sustain attendance. The project is also working to activate local government to provide workers with access to entitlements and protections, which addresses the economic conditions underlying the root cause of child labor. Key district-level government agencies agreed to join a government compact to coordinate with the project stakeholders.



120+ children re-enrolled in school

What's needed. The HTF initiative is producing real results and needs to grow. More companies sourcing cotton from India must join the program, and those already committed must extend their funding beyond the current two-year horizon. The program's reach is directly tied to the number of buyers participating; more companies mean more farms covered, more workers protected, and more children back in school.

Every company sourcing cotton from India must trace their supply chains all the way to the raw material level, to the farms where cotton is harvested. Traceability must be paired with accountability: buyers must ensure that every worker harvesting cotton in their supply chain is earning a living wage. Poverty wages are not a footnote to the abuses we documented. They are the condition that makes those abuses possible.

Several companies are already exploring how the HTF community-level model could be applied to other farms in their supply chains. And this model can and should be extended to other sectors. That is exactly the kind of systemic change this work is designed to produce, and we urge companies to move in this direction.



DRIVING CORPORATE ACCOUNTABILITY IN CRITICAL MINERALS

The global push for clean energy depends on critical minerals—but the communities living closest to where those minerals are extracted often bear the heaviest costs.

In 2025, Transparentem completed its first investigation into critical mineral mining, uncovering evidence of land dispossession, loss of livelihoods, severe water and air pollution, threats to health and life, and harm to indigenous groups. Many of these communities have raised concerns for years. Our investigation examines the disconnects between corporate accounts and community experience—and what companies must do to close them. Our full findings will be released in spring 2026.

EXPANDING THE CIRCLE OF ACCOUNTABILITY

FROM EVIDENCE TO ENFORCEMENT

In November, U.S. Customs and Border Protection (CBP) issued a Withhold Release Order (WRO) on garments, apparel, and textiles from the Firemount Group, a manufacturer included in our [investigation](#) into forced labor in apparel manufacturing in Mauritius. A WRO freezes goods suspected of being made with forced labor from entering the U.S. market. CBP cited four forced labor indicators: debt bondage, deception, intimidation and threats, and abuse of vulnerability.

Transparentem had engaged the Firemount Group and eight connected buyers for three years without receiving confirmation that abuses had been remedied, including that migrant workers had been reimbursed for the recruitment fees they paid to secure their jobs.

The resulting WRO is a reminder that for companies unwilling to act in the face of clear evidence, the consequences are real and the tools to enforce them exist. We expect the number of WROs issued by CBP to continue to rise.

THE INVESTOR DIMENSION

In late 2025, Transparentem published [Material Risk, Minimal Response: How Investment Firms Assess Unethical Labor Recruitment](#), an analysis of how 12 major investment firms are addressing recruitment-related forced labor risks in their portfolios. We examined those risks through the lens of Malaysia's electronics sector, which has a documented history of forced labor.

The findings are striking. None of the 12 firms had comprehensive policies on the ethical recruitment of workers. Only one third analyzed recruitment-related risks at all. Many still rely on social audits that routinely fail to detect deception and debt bondage. Unethical recruitment, including when workers pay to secure their jobs, is a primary driver of forced labor. It traps people in debt and exposes investors and companies to financial, legal, and reputational damage.

Investors should treat unethical recruitment not as a peripheral social concern, but as a core compliance issue that demands proactive oversight across portfolio companies and their supply chains. Transparentem is bringing direct, credible evidence to conversations with investors: we show them, with specificity, where their exposure is and what responsible companies are doing to address it.

We are also in the midst of a substantial project to identify gaps in the labor safeguards and test Grievance Redress and Accountability Mechanisms (GRAMs) of development finance institutions, drive remedy for impacted workers, and use the learnings to develop and socialize the concept for an international, private sector GRAM for investors.



THE ROAD AHEAD

The work doesn't stop. Our first project on critical mineral supply chains will be released this spring, investigations are ongoing in two new countries, and a five-year strategy is in development. A decade in, we know that holding corporations accountable transforms the lives of workers, children, and communities—and is a critical check on impunity, wherever it persists.

OUR SUPPORTERS & PARTNERS

None of this work happens without people who are willing to invest in transformative accountability. We are grateful to our supporters and partners for their trust, their resources, and their belief in what's possible.

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We also gratefully acknowledge the generous contributions of our major funders, whose support fuels our programs and amplifies our reach. **Transparentem receives funding from a range of donors, both public and private. Those include but are not limited to the following:**

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Transparentem's [2024 Form 990](#) and [2024 Audited Financial Statements](#) are available on our website.

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