



► D5.2 Corporate Network mapping availability

Finding company connections: An investigation into public sources of corporate relationship information

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Abstract

Company relationships are a core underlying dataset for understanding the corporate world, yet the data on such relationships is siloed in different sources, in a variety of different forms (structured, unstructured, semi-structured), and with a range of formats (web pages, PDFs, XML, TIFFs, CSV etc). This report surveys the landscape for such data, specifically examining sources for data on corporate structures, the relationship between corporate entities and brands, and supplier chain data. This report examines company registers, company self-disclosure, other open information projects

and government data. The international push towards beneficial ownership transparency has been a game changer for access to more data on corporate structures. Most countries in EU do not make corporate structure information available publicly, let alone as public data despite good case studies of UK, New Zealand, Bulgaria and Czech Republic are the surprising exception to this. With several countries such as Nigeria, Australia, South Africa, Norway and Netherlands pledging to release this information in the future, there will be more information available about corporate structures.

We found that, despite positive trends of more industry and media focus on supply chain transparency and the presence of self-disclosure by leading companies, the availability of supply chain data remains sparse.

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1 Executive Summary

Company relationships are a core underlying dataset for understanding the corporate world, yet the data on such relationships is siloed in different sources, in a variety of different forms (structured, unstructured, semi-structured), and with a range of formats (web pages, PDFs, XML, TIFFs, CSV etc). This report surveys the landscape for such data, specifically examining sources for data on corporate structures, the relationship between corporate entities and brands, and supplier chain data.

No such survey can be entirely comprehensive – even after 5 years in this field, OpenCorporates is discovering new datasets, and the landscape is changing rapidly, as the realisation of the importance of open company data becomes more widely accepted, with the consequent opening up of previously closed datasets. The focus for this report is on EU sources, or sources that contain significant amounts of data on EU companies, or on companies with a significant presence in the EU. The international push towards beneficial ownership transparency has been a game changer for access to more data on corporate structures. Most countries in EU do not make corporate structure information available publicly, let alone as public data despite good case studies of UK, New Zealand. Bulgaria and Czech Republic are the surprising exception to this. With several countries such as Nigeria, Australia, South Africa, Norway and Netherlands pledging to release this information in the future, there will be more information available about corporate structures.

We found that, despite positive trends of more industry and media focus on supply chain transparency and the presence of self-disclosure by leading companies, the availability of supply chain data remains sparse. European countries themselves have been relatively slow at transparency about spending and contracts, and in addition have rather different supply chains compared with, say, manufacturing, FMCGs, retailers or extractives.

2 Introduction

Company relationships are a core underlying dataset for understanding the corporate world, yet the data on such relationships is siloed in different sources, in a variety of different forms (structured, unstructured, semi-structured), and with a range of formats (web pages, PDFs, XML, TIFFs, CSV etc). This report surveys the landscape for such data, specifically examining sources for data on corporate structures, the relationship between corporate entities and brands, and supplier chain data.

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3 Corporate network information in EU and beyond

3.1 Registers

While we are focusing on EU scope here, the global nature of corporations means there is a wealth of information in non-EU sources either about EU corporations, or non-EU corporations with EU operations – for example the US Federal Reserve database of Bank Holding Companies includes information for both US bank operations in Europe, and some European bank operations in and outside the US. Similarly, a number of large European companies that fall within the remit of the SEC's EDGAR database, and consequently report their subsidiaries as part of their 20-F filings.

We have listed just those company registers where corporate structure information is freely available. We expect this list to increase over the course of this project, as the trends towards opening up company data increases, and we will be keeping watch for such changes.

3.2 What the data looks like

Example of parent company information in XBRL filings (for [Veolia ES MRC](#)) available from Belgian national bank.

```

<pfs:InformationParentCompanies>
    <pfs:ParentEntityName contextRef="CurrentDuration">VEOLIA PROPRETE SA</pfs:ParentEntityName>
    <pfs:ParentEntityAddress>
        <pfs-gcd:AddressType>
            <pfs-vl:XCode_AddressTypeCode_001
contextRef="CurrentDuration">001</pfs-vl:XCode_AddressTypeCode_001>
        </pfs-gcd:AddressType>
        <pfs-gcd:Street contextRef="CurrentDuration">Av. Georges Clémenceau</pfs-gcd:Street>
        <pfs-gcd:Number contextRef="CurrentDuration">129</pfs-gcd:Number>
        <pfs-gcd:PostalCodeCity>
            <pfs-gcd:PostalCodeCityOther>
                <pfs-gcd:PostalCodeOther contextRef="CurrentDuration">92735</pfs-gcd:PostalCodeOther>
                <pfs-gcd:City contextRef="CurrentDuration">Nanterre</pfs-gcd:City>
            </pfs-gcd:PostalCodeCityOther>
        </pfs-gcd:PostalCodeCity>
        <pfs-gcd:CountryCode>
            <pfs-vl:XCode_CountryCode_FR contextRef="CurrentDuration">FR</pfs-vl:XCode_CountryCode_FR>
        </pfs-gcd:CountryCode>
    </pfs:ParentEntityAddress>
    <pfs:IntegrationEntityAccountConsolidatedParentAccount
contextRef="CurrentDuration">true</pfs:IntegrationEntityAccountConsolidatedParentAccount>

```

Czech Republic

Accessed 1/07/2016

An example of how corporate network information can be found in the ‘Other facts’ section of the Czech Republic register. There is diversity in how countries require this data to be reported. In the UK for instance, it is often included in the form of a list or paragraph in the Annual Return (AR01).

 Veřejný rejstřík a Sbírka listin

Certificate of Incorporation
GOLDMAN SACHS INTERNATIONAL, branch and 74851 [Print](#)
 registered at the Municipal Court in Prague

[Back to search results](#)

Date of registration: December 5, 2011

File number: A 74851 registered at the Municipal Court in Prague

Designation GOLDMAN SACHS INTERNATIONAL, organizational unit
branch:

Punch: Praha 1, Na Příkopě / 19, ZIP code 11719

Identification number: 241 85 621

Legal form: Branch office of foreign legal entities

Scope of business: electricity trade

Branch Manager:

EMMANUEL CLAIR, data. b. 24th January 1970
 EC4A2BB London, 120 Fleet Street, United Kingdom of Great Britain and Northern Ireland

Founder - a foreign person:

GOLDMAN SACHS INTERNATIONAL
 Registration number: 2263951

Statutory body of the founder - foreign persons:

RICHARD J GNODE, data. b. 31st March 1960
 EC4A 2BB London, 133 Fleet Street, United Kingdom of Great Britain and Northern Ireland

LORD BRIAN GRIFFITHS, data. b. 27th December 1941
 EC4A 2BB London, 133 Fleet Street, United Kingdom of Great Britain and Northern Ireland

MICHAEL SIDNEY SHERWOOD, data. b. 29th July 1965
 EC4A 2BB London, 133 Fleet Street, United Kingdom of Great Britain and Northern Ireland

ROBIN ANTONY VINCE, data. b. 12th March 1971
 EC4A 2BB London, Fleet Street 133 United Kingdom of Great Britain and Northern Ireland

CLAES AKE GUSTAF Dahlback, data. b. 6th June 1947
 EC4A2BB London, 133 Fleet Street, United Kingdom of Great Britain and Northern Ireland

Other facts:

Goldman Sachs International (a company with unlimited liability) are governed by English law and is registered with the Registrar of Companies for England and Wales under registration number 2,263,951th

This listing is [unmarketable](#) and was taken to the Internet (<http://www.justice.cz>).

Date: July 1, 2016 12:46

3.3 Corporate Control Information

Category	Source	Description	URL	Structured?	Candidate?
Company Registers	UK Beneficial Ownership (PSC) Register	In July 2016, UK started publishing the world's first public beneficial ownership register (technically a register of Persons of Significant Control), including not just the natural persons who ultimately control companies, but also UK companies controlled by other UK companies. As part of this project, OpenCorporates has already created a data model for this and is ingesting into OpenCorporates. While much of the information is about beneficial owners, there is key information about companies controlled by other companies, for example Diageo PLC controlling Guinness Ltdⁱⁱ	<a href="http://www.companieshouse.gov.uk<sup>iii</sup>">http://www.companieshouse.gov.ukⁱⁱⁱ	Yes	Yes. Already importing
	Other EU Beneficial Ownership registers	Other EU countries will also be creating Beneficial Ownership registers under the 4th Anti-Money Laundering Directive, and while only a minority of countries have committed to making them public, still less open data, the clear trend is towards transparency in this area	tbc	Unknown	Unknown
	Denmark	Denmark now makes shareholder information available as part of its official API. This is not strictly speaking open data (users must get a specific API from the Danish register), but the terms of use are not too restrictive, and OpenCorporates is now importing shareholder data (and inferring corporate relationships from them) as part of this project.	<a href="https://datacvr.virk.dk/data/?language=en-gb<sup>iv</sup>">https://datacvr.virk.dk/data/?language=en-gb^{iv}	Yes	Yes. Already importing
	Belgium	Basic company information is made available as open data, and while neither this, nor the companies register, includes information on subsidiaries or parent companies, parent company information is included in the Annual Accounts filed at the Belgian National Bank. In many cases this is available as XBRL, see below	<a href="https://cri.nbb.be<sup>v</sup>">https://cri.nbb.be^v	Some	Yes
	Croatia	Although information on subsidiaries or parent companies is not available, the register provides basic information for free, including ID and registration numbers, year established and registration date, type of organisation, address and contact details. Detailed filings such as annual accounts/returns, or balance sheets are not available.	<a href="http://www1.biznet.hr/HgkWeb/do/fullSearch<sup>vi</sup>">http://www1.biznet.hr/HgkWeb/do/fullSearch^{vi}	Semi	

	Republic of Cyprus	Basic company information is provided on the website. Key filings that might contain corporate relationship information (e.g. accounts, annual reports, or annual returns are not available) and no information about corporate network was found.	http://www.mcit.gov.cy/mcit/drcor/drcor.nsf/index_en/index_en ^{vii} https://efiling.drcor.mcit.gov.cy/DrcorPublic/SearchForm.aspx?sc=0&lang=EN ^{viii}	Semi	
	Estonia	The filings contain no information about subsidiaries, but do include lists of shareholders. All filings are behind a paywall of 1 to 2 euros per document. "Annual reports" and "documents in the business file" are at 2 euros each, however they cannot be purchased. An overview of what is contained in each document is provided, while "The printout of the history of registry card information" is available in both English and Estonian.	https://ariregister.riki.ee/index?lang=en ^{ix}	Semi	
	Finland	Finland makes a considerable amount of company information available as open data, however there is no shareholding information, nor information about subsidiaries/parent companies. XBRL filings will be available later this year under a pilot programme, although it isn't yet decided whether this will be available for free or as open data	http://avoindata.prh.fi/ ^x	Some	
	Latvia	Full company reports as well as access to the "submitted annual accounts in industry" is available upon connecting to Lursoft databases by creating an account, paid via Mastercard. Among the potential paid information is a "Relationship GRAPH" document . The Company Register company offers daily updated basic company information as open data in CSV for all registered business entities.	https://www.lursoft.lv/en/data-bases-of-companies ^{xi} http://dati.ur.gov.lv/register ^{xii}	Varies	
	Lithuania	Detail data on the registration of legal entities are provided only to registered users and are accessible for a fee. Among the filings available are shareholder documents	http://www.registrucentras.lt/jar/p_en/ ^{xiii}	No	

	Luxembourg	<p>Excerpts can be bought via credit card at the Registre de Commerce et des Societes for 10,43 euros (12,20 euros with VAT) each in electronic form upon creating a user account. Archives with a filing date prior to June 1, 2016 can be found on Legilux where research on public information is available. Filings including balance sheets in pdf are available, however they do not include information on subsidiaries or parent companies.</p>	<p>http://supervisedentities.cssf.lu/index.html?language=en#Home^{xiv}</p> <p>http://www.legilux.public.lu/entr/search/index.php^{xv}</p> <p>https://www.rcsl.lu/mjrcs/isp/IndexActionNotSecured.action?time=1467733810018&loop=1^{xvi}</p>	No	
	Malta	<p>The Malta Financial Services Authority - Registry of Companies system requires registration approved by the MFSA system administrator, as well as prepayment on the account via Credit Card or the Registry Cash Office in order to access the system. Basic company information however is available for free at The Registry of Companies Supporting Services but no information about corporate network was found.</p>	<p>https://registry.mfsa.com.mt/generic.do?action=about^{xvii}</p> <p>http://roesupport.mfsa.com.mt/pages/Default.aspx^{xviii}</p>	No	
	Poland	<p>Register provides basic entity information publicly which does not include information on subsidiaries or parent companies.</p>	<p>https://ems.ms.gov.pl/^{xix}</p>	Semi	

	Portugal	<p>There are two portals for access to company data – https://www.portaldocidadao.pt/ and http://publicacoes.mj.pt/Pesquisa.aspx. The latter contains filings, in image format and with access restricted with a capcha. Although filings containing corporate relationship information were found, no annual accounts nor lists of subsidiaries were found, and the filings are image-based PDFs making extraction of data automatically (or automatic translation) effectively impossible</p>	https://bde.portaldocidadao.pt/evo/services/Online/Pedidos.aspx?service=PN_Sxx http://publicacoes.mj.pt/Pesquisa.aspxxxi	No	
	Romania	Provides basic company information publicly which does not include corporate network information.	http://www.mfinant.ro/agentinume.html?pagina=domeniixxii	Semi	
	Slovakia	Contains basic company information for free as well as basic shareholding information.	http://orsr.sk/search_subjekt.asp?lan=enxxiii	Semi	Yes
	Slovenia	Requires a free registration in order to search and view online, or download in pdf basic information about the entity which is available publicly. However, this information is stated in a very summarised manner and not in much detail. Information on subsidiaries or parent companies was not included.	http://www.ajpes.si/prsxxiv	Semi	
	Sweden	The filings contain little to no information about corporate networks and are behind a paywall. Available documents include Annual Reports, Articles of Association (both at £4.50), and Interim Reports. Annual Report did not contain information on subsidiaries or parent companies.	http://www.bolagsverket.se/en/info/buy/e-services/company-informationxxv	No	
	Norway	Norway does publish open data on companies, but does not publish officers, nor shareholders. However, corporate structure filings are freely available, but in an unstructured form, and with a complex process that requires a user account, a request for the corporate structure for a specific company, before a link to the PDF is emailed to you	https://www.brreg.no/produkter-og-tjenesterxxvi	No	

	Netherlands	To access records, an account must be created and a pre-payment must be made. Filings are expensive. The 'top corporate relationships' and 'direct subsidiary' filings contain parent and child company names, register identifiers, jurisdictions, share percentage (if 100%) and liability/director icons (the meaning of which was not clear). Only entities registered in the Netherlands were included in the filings.	http://www.kvk.nl/ <small>xxvii</small>	No	
	Czech Republic Registrar	Czech Republic publishes company information on their public register including officers/directors, the parent company, and shareholders. There is no captcha, and so it appears to be possible to screen scrape the data	Verejný rejstřík sbírka listin <i>Public register and the collection of documents</i> https://or.justice.cz/ <small>xxxviii</small>	Semi	Yes
	France	There are two sources for company information in France: Insee (French statistical agency) and Infogreff (which combines chamber of commerce data). The latter does contain annual accounts filings (as PDFs, not data) which list subsidiaries, however these are paid for, and it's not clear that these list all subsidiaries. France is gradually opening up its company data, but has not committed to opening up all data, nor are we aware of any plans to collect the accounts filings as XBRL.	https://avis-situation-sirene.insee.fr <small>xxxx</small>	No	
	Hungary	Some corporate structure is retained, particularly for companies that are being dissolved. It is worthy to note that while this information is public, the documents are in PDF and there is a Captcha which means it cannot be scraped.	Igazságügyi Minisztérium http://e-beszamolo.im.gov.hu/oldal/kezdolap <small>xxxii</small>	Semi	

	Ireland	Annual Return (B1 forms) asks companies to report subsidiaries. No captcha is required but filings must be bought.	https://search.cro.ie/company/CompanySearch.aspx ^{xxxiii}	No	
	Bulgaria	The open data portal is published as an XML (although the online register is behind a captcha). Shareholder information is part of this open data.	https://opendata.government.bg/dataset/tbprobekn-pernetbp/resource/27934ef-b9c2-45dc-ac68-39112898eb53 ^{xxxiv}	Yes	
	Italy	All filings are behind a paywall, and while there are XBRL filings, this isn't considered a viable source for information due to the fee restrictions. Information is available in bulk (for a fee), but there are restrictive licence conditions put on it	http://www регистраzione imprese.it/ ^{xxxv}	N/A	
	Austria	Offers "financial statements" for 9.13 euros and "current companies deeds" (an overview of all valid entries for the selected date) for 13.22 euros in German, in pdf, available for purchase. Current companies deeds does not contain corporate network information. Financial statements are in scanned pdf form and contain a list of shareholding and liabilities information.	http://www.firmenbuch.at/ ^{xxxvi}	No	
	Germany	The Unternehmensregister contains some the most detailed information about company's including financials, some of which do contain corporate relationship data. However, other relevant documents are 5 euros each. None is in the form of structured data.	https://www.hanelsregister.de/rp_web/mask.do?Typ=n https://www.unternehmensregister.de/reg/?submitaction=language&language=en	No	

	Greece	The Greek registry does provide financial filings, which includes some subsidiary information, but this is in the form of image-based PDFs, meaning that not only is it not possible to extract data from it, but that it also does not allow automatic translation services, making crowdsourcing difficult.	https://www.businessregistry.gr/publicity/index http://www.et.gr/index.php/2013-01-28-14-06-23/search-ae-epe-issue-with-publisher-criteria ^{xxxviii}	No	
	Spain	Registradores.org requires registration but the quality of data remains poor. You have to ask for a specific file and can't browse them. Neither the 'annual accounts' or 'consolidated accounts' for 2013-2015 requested were available. Only available option was 'mercantile information' which cost 3 euros and contained no information about corporate network. Comisión Nacional de Mercado de Valores (Spanish markets regulator) provides annual financial reports for some entities in pdf form and in Spanish.	http://www.cnmv.es/portal/Consultas/BusquedaPorEntidad.aspx https://www.registadores.org/registroonline/home.seam ^{xxxix}	No	

Stock markets	US SEC filings	The annual reports submitted to the US Securities and Exchange Commission by companies required to file (broadly, listed US companies, and companies issuing securities in the US) include information of significant subsidiaries, although as unstructured text. OpenCorporates has been extracting information from this for some time, and as part of this project is making significant improvements to the quality and number of subsidiaries extracted from the filings.	https://www.sec.gov/everythingedgar ^{xl}	No	Yes – in progress
	Other stock market information	Stock market disclosures and filings frequently contain some corporate structure information, although perhaps surprisingly it is usually in a free-text format, making it problematic to convert into structured data . In addition there are questions about the licence associated with the data, with it often only being available from the Stock market, or from proprietary sources. While there is a requirement for this to be made available at ‘Officially Appointed Mechanisms’ under the EU “Transparency Directive”, access remains poor and inconsistent. Ironically, this has led to a situation where data on private companies is sometimes more available and more structured than on listed companies (for example, listed companies are exempt from reporting on their beneficial owners in the UK PSC register). It is to be hoped that when the European Electronic Access Point ^{xli} is introduced to make this available at a single point, it will be available as freely available, openly licensed data, as it is at the US SEC		No	Possibly (more investigation needed)
Other sources	XBRL filings	There are a few sources which both allow filings of annual accounts or reports and publish them freely and openly, including the US SEC, the company registers for the UK and Denmark, and the Belgian national bank. This information sometimes contains corporate structure information not available in subsidiary reports, including disclosures of related parties, inter-company loans or guarantees, and accounting consolidation information			Yes
	Global Legal Entity Identifier System	The Global LEI system was set up by the Financial Stability Board at the behest of the G20 to provide stable, unique identifiers for entities involved in financial transactions for the public good. Later this year, corporate relationship information will start to be collected and published, initially based on accounting consolidation principles. Like the core entity data, the relationship data will be freely available for all to use	https://www.leiroc.org/publications/gls/lou_20161003-1.pdf https://www.gleif.org/ ^{xlii}	Structured	Yes, when available

	Companies self-reporting corporate structures as data	OpenCorporates is working with the B-Team to provide a methodology and structure for companies to self-report their corporate structures as open data. In May, to coincide with the global Anti-Corruption Summit held in London, two multinational companies – Unilever and Natura – published corporate structure information as part of this work. Work still needs to be done on this data, but we expect to import it as part of this project later this year		Structured	Yes
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3.4 Brand Information

The relationship between brands, companies and suppliers is complex and often opaque. A well-known brand, for example Coca-Cola, is a trademark, a name of a corporation, and a product (in fact a collection of products). Ordinary users will frequently conflate these things together, considering not just all of these things to be ‘Coca-Cola’ at different times, but also assuming the corporation’s partners to be ‘Coca-Cola’ too, for example the Coca-Cola local bottling companies. Similarly many would assume McDonald’s franchised restaurants to be part of the McDonald’s brand. Finally, it’s not uncommon for the trademark not to be owned by the ultimate parent

corporation, but by a subsidiary (for example see [https://opencorporates.com/data/2061655^{xliii}](https://opencorporates.com/data/2061655)), sometimes in a jurisdiction where there are favourable tax treatments for IP revenue.

Source	List of suppliers	URL	Structured?
Wikipedia	Being a human-curated and contributed resource, Wikipedia (and the sister site Wikidata) is actually quite a good proxy for what ‘ordinary people’ consider brands, and to an extent connects them to the corporations. The downside is that both the concept of a brand, and the associations with corporations are informal ones, rather than, for example, the legal associations of trademark registers. In addition, clearly the brands in Wikipedia are limited to the most significant ones (‘notable ones’ in Wikipedia parlance) – however this does include many of the leading brands ordinary users are familiar with.	https://en.wikipedia.org/wiki/Category:Brands_by_company^{xlv} https://en.wikipedia.org/wiki/Category:High_fashion_brands^{xlv}	HTML - semi
Open Product Data	The goal of this project is to build the largest open product database in the world, allowing consumers to get information about a given product in real time by simply scanning its barcode with their mobile phone. There is a downloadable database; however it is not clear that it is being kept up-to-date	http://product-open-data.com/^{xlvii}	Structured
World Intellectual Property Organisation	WIPO has a significant database of trademarks, under the Madrid System^{xlviii} , a one-stop solution for registering and managing marks worldwide. This dataset is freely available as a download from their FTP servers. OpenCorporates is already importing data from this source, but will be improvement the matching of these records to companies as part of this project	http://www.wipo.int/madrid/en/romarin/	Structured
US Patent & Trademark Office	The USPTO has a huge database of trademarks which is freely available for download, featuring the largest brands and products in the world. OpenCorporates is not yet collecting this information but will look at doing so, as part of this project	http://www.uspto.gov/learning-and-resources/electronic-data-products/trademark-data-products^{xlviii}	Structured
Other trademark registers	There are multiple other trademark registers, both national (e.g. UK, Germany), and subnational (e.g. US States). However, given the importance of the US market, and the importance of WIPO, we believe most important trademarks will be available from the above sources, particularly as only a small proportion make the information available as open data		Structured, semi-structured, unstructured

Domain registration	There is a link between brands and domains, and it is sometimes possible to infer brand-to-company associations from the domains, and the domain registrations, particular with the increasing use of SSL for websites, and the use among larger companies of EV certificates. This is not trivial, but something OpenCorporates is exploring as part of this project		Semi-structured
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4 Open supply chain information

"More than a century later, companies continue to face scrutiny of their supply chain practices, including workers' rights, product safety and integrity, and environmental responsibility. Evidence of this scrutiny in recent years is visible through a number of high-profile global events. Brands have been exposed. Coalitions have formed. And more stringent laws have been passed. Yet many companies struggle to achieve supply chain transparency. A recent study conducted at Stanford's Graduate School of Business revealed that while most respondent companies have social and environmental systems in place for internal operations, less than a third have similar structures to monitor the practices of their immediate and extended supplier network." - Deloitte, Path to Supply Chain Transparency (2013)

Supply chain transparency has been at the core of labour rights and ethical trading debates, but incidents like the Rana Plaza disaster and iPhone scandal has brought the murky issue of complex supply chains into the political landscape. As the Deloitte report suggests, despite having focus on social and environmental responsibility plans, less than a third of firms have appropriate monitoring and tracking of their supply chains. Research conducted by OpenCorporates, shows that much of the work in this area is still confined to a few torch bearing companies and closed industry networks. This research involved speaking to civil society organisations such as Amnesty International and Global Witness doing groundbreaking investigations into conflict minerals, contacting NGOs such as Business & Human Rights Resource Centre, Labour Behind the Label, Ethical Fashion Forum, Clean Clothes, OpenOil, examining watchdogs database solution providers such as Know The Chain, Verite, Accountability Hub and doing a literature scan of reports from Deloitte, OECD, Global Witness, Amnesty International, Fashion Revolution, and Business & Human Rights Resource Centre.

The **torch bearers** in this space are those companies such as [Apple](#)^{xlix}, [Dell](#)^l, [Adidas](#)^{li}, [H & M](#)^{lii} and [Levi Strauss](#)^{liii} that are publishing supplier lists. Some of these lists are structured; some are not. The format can range from CSV, XML to PDFs and interactive maps. Most only disclose factory name or company name, and at most, an address. Where factory name is mentioned and company name

is not, as in the case of Adidas, it would need to be matched to a source where companies disclose their factory names as they may not be the same.

A. CFSI Compliant Smelters

METAL	SMELTER NAME	SMELTER ID	COUNTRY
GOLD	AIDA CHEMICAL INDUSTRIES CO., LTD.	CID000019	JAPAN
GOLD	ALLGEMEINE GOLD-UND SILBERSCHEIDENSTALT A.G.	CID000035	GERMANY
GOLD	ANGLOGOLD ASHANTI CÓRREGO DO SÍTIO MINERAÇÃO	CID000058	BRAZIL
GOLD	ARGOR-HERAEUS S.A.	CID000077	SWITZERLAND
GOLD	ASAHI PRETEC CORP.	CID000082	JAPAN
GOLD	ASAHI REFINING CANADA LTD.	CID000924	CANADA
GOLD	ASAHI REFINING USA INC.	CID000920	UNITED STATES
GOLD	ASAKA RIKEN CO., LTD.	CID000090	JAPAN
GOLD	AURUBIS AG	CID000113	GERMANY
GOLD	BANGKO SENTRAL NG PILIPINAS (CENTRAL BANK OF THE PHILIPPINE	CID000128	PHILIPPINES
GOLD	BOLIDEN AB	CID000157	SWEDEN
GOLD	C. HAFNER GMBH + CO. KG	CID000176	GERMANY
GOLD	CCR REFINERY - GLENCORE CANADA CORPORATION	CID000185	CANADA
GOLD	CHIMET S.P.A.	CID000233	ITALY
GOLD	DODUCO GMBH	CID000362	GERMANY
GOLD	DOWA	CID000401	JAPAN
GOLD	ECO-SYSTEM RECYCLING CO., LTD.	CID000425	JAPAN
GOLD	ELEMENTAL REFINING, LLC	CID001322	UNITED STATES
GOLD	EMIRATES GOLD DMCC	CID002561	UNITED ARAB EMIRATES
GOLD	HEIMERLE + MEULE GMBH	CID000694	GERMANY
GOLD	HERAEUS LTD. HONG KONG	CID000707	CHINA
GOLD	HERAEUS PRECIOUS METALS GMBH & CO. KG	CID000711	GERMANY
GOLD	INNER MONGOLIA QIANKUN GOLD AND SILVER REFINERY SHARE CO	CID000801	CHINA
GOLD	ISHIFUKU METAL INDUSTRY CO., LTD.	CID000807	JAPAN
GOLD	ISTANBUL GOLD REFINERY	CID000814	TURKEY
GOLD	JAPAN MINT	CID000823	JAPAN
GOLD	JIANGXI COPPER CO., LTD.	CID000855	CHINA
GOLD	JSC EKATERINBURG NON-FERROUS METAL PROCESSING PLANT	CID000927	RUSSIAN FEDERATION
GOLD	JSC URALELECTROMED	CID000929	RUSSIAN FEDERATION
GOLD	JX NIPPON MINING & METALS CO., LTD.	CID000937	JAPAN

The Dell Smelters List (June 2016), as part of the CSFI initiative.

<http://i.dell.com/sites/doccontent/corporate/corp-comm/en/Documents/smelter-list.pdf>^{div}

Supplier Name	Address
Alps Electric Co. Ltd.	6-3-36 Furukawa Nakazato, Sendai, Miyagi, Japan
Alps Electric Co. Ltd.	230, Shibue, Wakuya, Tohda-gun, Japan
Alps Electric Co. Ltd.	P.T. 10643, Nilai Industrial Estate, Nilai, Negeri Sembilan, Malaysia
Amphenol Corp.	No. 98-5, Road 19, Hangzhou Economic and Technological Development Zone, Hangzhou, Zhejiang, China
Amphenol Corp.	No. 689 Shennan Road, Xinzhuang Industry Park, Shanghai, China
Amphenol Corp.	Block A3/A4, The 4th Industrial District of Industrial Headquarters, Dongkeng Road, Gongming Town, Shenzhen, Guangdong, China
Analog Devices Inc.	Bay F-1, Raheen Industrial Estate, Limerick, Ireland
Analog Devices Inc.	Gateway Business Park, Javalera, Gen. Trias, Cavite, Philippines
Analog Devices Inc.	NW Parker St, Camas, Washington, United States
Artesyn Embedded Technologies	1st Building, Emerson Industrial Park, FengTang Road, Fuyong, Bao'an District, Shenzhen, Guangdong, China
Artesyn Embedded Technologies	No. 68, Baocheng East Road, Fucheng Town, Luoding, YunFu, Guangdong, China
Artesyn Embedded Technologies	Main Avenue Corner Road J, PEZA Complex, Rosario, Cavite, Philippines
Asahi Glass Co., Ltd.	3583-5 Kawashiri, Yoshida-cho, Haibara-gun, Shizuoka, Japan
Asahi Glass Co., Ltd.	1-8 Machikikedai, Koriyama, Fukushima, Japan
Asahi Glass Co., Ltd.	5-6-1, Umeda, Takasago, Hyogo, Japan
Asahi Glass Co., Ltd.	SAHA Group Industrial Park Lamphun 99/39 Moo 5, Pasak, Muang Lamphun, Lamphun, Thailand
Asia Vital Components Ltd.	No. 5, Lane 8, Rongjiang Road, Songjiang Export Processing Zone, Shanghai, China
Asia Vital Components Ltd.	West Industry Park, Xinyang Industrial Zone, Shajing Town, Bao'an District, Shenzhen, Guangdong, China
AU Optronics Corp.	No. 398 Suhong Middle Road, Suzhou Industrial Park, Suzhou, Jiangsu, China
AU Optronics Corp.	No. 1 Li Hsin Road 2, Hsinchu Science Park, Hsinchu, Taiwan
Austria Microsystems (AMS AG)	Tobelbadestrasse 30, Unterpremstätten, Styria, Austria
Austria Microsystems (AMS AG)	B2-1D Carmelray Industrial Park II, Barangay Tula, Calamba, Laguna, Philippines
Austria Technologie and Systemtechnik AG	No. 5000 Jin Du Road, Shanghai, China
Avago Technologies Ltd.	110 America Parkway NE, Allentown, Pennsylvania, United States
Avago Technologies Ltd.	4380 Ziegler Road, Ft. Collins, Colorado, United States

Apple Top 200 Suppliers List (February 2016)

[http://images.apple.com/supplier-responsibility/pdf/Suppliers.pdf^{lv}](http://images.apple.com/supplier-responsibility/pdf/Suppliers.pdf)

This practise is yet to become a trend for other global businesses, who may put plans in place internally (see [Intel's statement^{lvi}](#)) but not share their supply list publicly for the fear of loss of competitive advantage and reputation. There are however, **industry schemes and service providers** that act as gatekeepers and knowledge hub where companies are able to share supply chain concerns and lists such as the [CDP^{lvii}](#), [Conflict-Free Smelter Program^{lviii}](#), [London Bullion Market Association^{lix}](#), and [The Centre for the Study of Financial Innovation^{lx}](#).

The California Transparency in Supply Chains Act, which was signed into law in October 2010 and went into effect in January 2012, requires certain companies to report on their specific actions to eradicate slavery and human trafficking in their supply chains. Aimed at mid-size and large retailers and manufacturing companies with worldwide annual revenues of \$100 million or more, the law's chief goal is to ensure companies provide consumers with information that enables them to understand which ones manage their supply chains responsibly. It is estimated that the reporting requirement will impact about 3,200 companies headquartered in California or doing business in the state. However, despite this, and similar legislation in the UK, there currently appears to be governmental pressure on increasing the transparency of supply chains.

In absence of self-disclosure, investigators and journalists rely on conventional means of researching supply chains by looking at **regulatory filings**, which may contain information about corporate structure. IPO documents from China was used by [Amnesty International for their report^{lxii}](#) on cobalt mined by child labourer, ultimately becoming a component of electronic products made by Apple, Samsung and Sony.

It's worth noting that by far the single largest group of entities publishing supplier data is that of governments – both national and subnational, who through transparency and open data initiatives are publishing one or more of:

- Supplier lists (e.g. the [SAM data^{lxii}](#) from the US)
- Transactional Spending Data (which includes the supplier), such as that published by the UK Government, or [Checkbook NYC^{lxiii}](#)
- Contract Data (e.g. under schemes such as Open Contracting)

To date, European countries have been relatively slow at transparency about spending and contracts, and in addition have rather different supply chains compared with, say, manufacturing, FMCGs, retailers or extractives.

4.1 A selection of companies publishing supplier information

Source	List of suppliers	URL	Structured?
Apple	This list contains the 'Name' and 'Address' of the top 200 suppliers.	http://www.apple.com/supplier-responsibility/progress-report/	PDF - unstructured
HP	In addition to Name, address and product type, HP discloses whether their suppliers have published sustainability report using the Global Reporting Initiative (GRI) framework.	http://www8.hp.com/us/en/hp-information/global-citizenship/society/supplychain.html ^{lxiv}	PDF - unstructured
Nike	List of supplier names, and the products/brands they supplier. No country or address information is given	http://manufacturingmap.nikeinc.com/ ^{lxv}	Structured (JSON)
Marks & Spencer	The interactive map shows suppliers and their addresses categorised by countries and type on a map. Names of suppliers are not disclosed and there is no way to scrape this information.	http://interactivemap.marksandspencer.com/ ^{lxvi}	No - Interactive map
Network Rail	The list of suppliers, though in xls form, contains only names.	http://www.networkrail.co.uk/transparency/datasets/ ^{lxvii}	Yes - xls
Dell	Names of suppliers, hyperlinked with web urls and country. They also share their Smelters list which contains type of mineral, Smelter's name, ID and Country. No addresses are published.	http://www.dell.com/learn/us/en/uscorp1/cr-social-responsibility Smelters: http://i.dell.com/sites/doccontent/corporate/corp-comm/en/Documents/smelter-list.pdf	HTML - semi
Microsoft	Similar to Apple, Microsoft produces a list of top 100 Production Suppliers but this list only contains names.	https://www.microsoft.com/about/csr/transparencyhub/ ^{lxviii}	Word document
Levis Strauss	The document contains country, factory name, alternate factory name, address, city, and state.	http://www.levistrauss.com/suppliers-operations/	PDF - unstructured
H & M	H & M published a list on their web page with factory name, address, supplier name and supplier grading.	http://sustainability.hm.com/en/sustainability/downloads-resources/resources/supplier-list.html	HTML - semi structured
Adidas	Adidas produces the following lists: Group Global Factory, Primary Suppliers, Group Global Factory, and Group Licensee Factory List. These documents contain country name, factory name and city.	http://www.adidas-group.com/en/sustainability/supply-chain/supply-chain-structure/	PDF - unstructured

4.2 Databases and other sources

Source	Description	URL	Structured?
Accountability Hub	A database of legal mechanisms for individual and corporate accountability for human trafficking, forced labour and slavery around the world.	accountabilityhub.org ^{lxix}	
Know the Chain	KnowTheChain is a resource for businesses and investors who need to understand and address forced labor abuses within their supply chains. The site is led by Humanity United, and maintained through partnerships with the Business & Human Rights Resource Centre, Sustainalytics, and Verité.	www.knowthechain.org ^{lxx}	Unknown
BOMCheck.net	Centralised web database saves time and cost for suppliers to keep up-to-date with new substance regulations around the world. Suppliers can manage their data securely in the database and download declarations in industry standard IPC 1752A XML, PDF or Excel Formats.	https://www.bomcheck.net ^{lxxi}	Various
Various regulatory and stock market filings including IPO documents	Sometimes supplier information appears in regulatory filings, or filings to stock markets, usually because it is considered material, for example if the company is dependent on suppliers, or if there are competition issues. However, this information is almost always in an unstructured form, making it very difficult to find consistently, still less convert into structured data. There are a few sources which collect and freely publish annual accounts as XBRL (see also sources for corporate structure information), including the US SEC, the company registers for the UK and Denmark, and the Belgian national bank. At least in the case of SEC XBRL filings, information about key suppliers is sometimes included, although unfortunately the tags are not consistent, making parsing tricky. A comprehensive analysis of other XBRL filings has not yet surfaced similar information		Semi-structured

5 Conclusion

Company relationships are a core underlying dataset for understanding the corporate world, yet the data on such relationships is siloed in different sources, in a variety of different forms (structured, unstructured, semi-structured), and with a range of formats (web pages, PDFs, XML, TIFFs, CSV etc). This report examined the landscape for such data, specifically the relationship between corporate entities and brands, and supplier chain data with a focus on EU sources. The international push towards beneficial ownership transparency has been a game changer for access to more data on corporate structures. Most countries in EU do not make corporate structure information available publicly, let alone as public data despite good case studies of UK, New Zealand, Bulgaria and Czech Republic are the surprising exception to this. With several countries such as Nigeria, Australia, South

Africa, Norway and Netherlands pledging to release this information in the future, there will be more information available about corporate structures.

We found that, despite positive trends of more industry and media focus on supply chain transparency and the presence of self-disclosure by leading companies, the availability of supply chain data remains sparse. European countries themselves have been relatively slow at transparency about spending and contracts, and in addition have rather different supply chains compared with, say, manufacturing, FMCGs, retailers or extractives.

6 References

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ⁱⁱⁱUK Companies House <http://www.companieshouse.gov.uk>

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^vBelgium registry <https://cri.nbb.be>

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^li Adidas <http://www.adidas-group.com/en/sustainability/supply-chain/supply-chain-structure/>

^lii H & M <http://sustainability.hm.com/en/sustainability/downloads-resources/resources/supplier-list.html>

^liii Levi Strauss <http://www.levistrauss.com/suppliers-operations/>

^liv The Dell Smelters List (June 2016), as part of the CSFI initiative.

<http://i.dell.com/sites/doccontent/corporate/corp-comm/en/Documents/smelter-list.pdf>

^lv Apple Top 200 Suppliers List (February 2016)

<http://images.apple.com/supplier-responsibility/pdf/Suppliers.pdf>

^lvi Intel's policy: <http://www.intel.com/content/www/us/en/policy/policy-human-trafficking-and-slavery.html>

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^{lx}The Centre for the Study of Financial Innovation <http://www.csfi.org/>

^{lxii}Amnesty International's Child labour and smart phones report
<https://www.amnesty.org/en/latest/news/2016/01/Child-labour-behind-smart-phone-and-electric-car-batteries/>

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^{lxxii}BOM Check <https://www.bomcheck.net/>

Appendix

CORPORATE NETWORK INFORMATION

UK

RIVER ISLAND CLOTHING CO. LIMITED

[File for this company](#)Company number **00636095**[Overview](#) [Filing history](#) [People](#) [Charges](#)

Registered office address
Chelsea House, West Gate, London, W5 1DR

Company status
Active

Company type
Private limited Company

Incorporated on
31 August 1959

Accounts

Next accounts made up to **31 December 2015**
due by **30 September 2016**

Last accounts made up to **27 December 2014**

Confirmation statement

First statement date **30 November 2016**
due by **14 December 2016**

Annual return

Last annual return made up to **30 November 2015**

RIVER ISLAND CLOTHING CO. LIMITED

[File for this company](#)Company number **00636095**[Overview](#) [Filing history](#) [People](#) [Charges](#)**Filter by category** Show filing type

- Accounts
- Confirmation statements / Annual returns
- Capital
- Incorporation
- Charges
- Officers

Date	Description	View / Download
01 Dec 2015	Annual return made up to 30 November 2015 with full list of shareholders Statement of capital on 2015-12-01 GBP 3,400,010	View PDF (8 pages)
30 Sep 2015	Full accounts made up to 27 December 2014	View PDF (18 pages)
01 Dec 2014	Annual return made up to 30 November 2014 with full list of shareholders Statement of capital on 2014-12-01 GBP 3,400,010	View PDF (8 pages)
23 Sep 2014	Full accounts made up to 28 December 2013	View PDF (18 pages)
03 Dec 2013	Annual return made up to 30 November 2013 with full list of shareholders Statement of capital on 2013-12-03 GBP 3,400,010	View PDF (8 pages)
23 Sep 2013	Accounts made up to 29 December 2012	View PDF (18 pages)