



WALT DISNEY Studios Motion Picture Production

Sean Bailey
President

Mr. Darren Jones, MP
Ms. Nusrat Ghani, MP
Business, Energy and Industrial Strategy Select Committee
House of Commons
London SW1A 0AA

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Letter sent via email to: LECZNARM@parliament.uk

Dear Mr. Jones and Ms. Ghani,

Your letter dated 26 March 2021 to my colleague, Jan Koeppen, was referred to me, as he was not involved in the production of Mulan.

I will respond to your follow-up questions in the order that you presented them in your most recent letter.

- We respect the role and views of the Committee. Accordingly, we provided robust and comprehensive written testimony on 23 October 2020 that fully addressed the questions and the broader concerns posed by the Committee, thereby mitigating the need for in-person representation. I am attaching that written testimony here, for reference.
- Global businesses have a strong presence in China – hundreds of global companies, including dozens of Fortune 500 firms, operate throughout the country, and all are required to comply with relevant Chinese laws and regulations. In relation to film production, Chinese regulations prohibit foreign producers from operating independently and require them to partner with a Chinese production company. The Chinese partner is responsible for securing all filming permits. In this case, we hired Beijing Shadow Times Culture Co. Ltd. ("Beijing Shadow Times"), a private company that has worked extensively with U.S.-based film studios, to provide production related services in China, and the company began submitting requests for permits with state and local government entities in 2017. During this period, neither the EU, nor the U.S. Government had issued a risk advisory for businesses nor made any relevant policy rulings specific to the region. Our business was conducted solely through Beijing Shadow Times and it was the only entity that we paid, not authorities in XUAR.
- It is standard practice across the film industry worldwide to acknowledge in a film's credits the cooperation, approvals and assistance provided by various entities and

individuals over the course of a film's production. In this case, the production company Beijing Shadow Times provided our production team with the list of acknowledgements to be included in the credits for Mulan. The Walt Disney Company has no separate, independent or ongoing relationship with government authorities in the XUAR Province.

In any motion picture production, several factors are considered when making decisions about where to produce the film, including: economics, logistics, accessibility, availability of actors, and authenticity, to name just a few. Although Mulan was filmed almost entirely in New Zealand, in order to accurately depict the unique geography and landscape of China for this period drama, the producers chose to film some scenery in 20 locations throughout the country, including the Kumtag Desert in Xinjiang Province, home to an important passageway along the historic Silk Road. The decision to film in each of these locations was made by the film's producers in the interest of authenticity, and was in no way dictated or influenced by state or local Chinese officials. It also bears noting that the filming of the desert scenery occurred over a brief four-day period – compared to 143 days of filming in New Zealand, and the footage comprises 78 seconds of the one-hour and 55 minute film.

- The Walt Disney Company (TWDC) has a longstanding commitment to respecting human rights, which is embodied in our [Human Rights Policy Statement](#) and addressed in our corporate-wide [Standards of Business Conduct](#) which is provided to employees who are regularly trained on topics covered in the Standards. In order to give life to this commitment, we have extensive risk-based preventative and due diligence processes and resources in place. Our requirements and practices apply globally, including in China, and we have no direct relationships with facilities in Xinjiang. Finally, we did conduct a due diligence review of the Beijing Shadow Times Culture Co. Ltd. which is the only entity in China with which we had a commercial relationship for the production of Mulan.

I hope this further clarification is helpful to put the issue in the proper perspective.

Sincerely,



Sean Bailey

Enclosure: The Walt Disney Company Response to BEIS Inquiry, 23 October 2020