

**Company Name** Amazon.com, Inc.  
**Industry** Agricultural, Apparel & ICT Products (Supply Chain only)  
**Overall Score (\*)** 16.2 out of 100

Theme Score	Out of	For Theme
0.5	10	A. Governance and Policies
3.9	25	B. Embedding Respect and Human Rights Due Diligence
1.3	15	C. Remedies and Grievance Mechanisms
2.8	20	D. Performance: Company Human Rights Practices
6.3	20	E. Performance: Responses to Serious Allegations
1.4	10	F. Transparency

(\*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: General HRs commitment: The Company provided information to CHRB in relation to this indicator, but it was not material. [Supplier Code - Responsible Sourcing website, 04/2019: <a href="https://sustainability.aboutamazon.com">sustainability.aboutamazon.com</a>]</li> <li>Not met: UNGC principles 1 &amp; 2</li> <li>Not met: UDHR</li> <li>Not met: International Bill of Rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: UNGPs</li> <li>Not met: OECD</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: ILO Core: Its Code of Business Conduct does not cover all ILO core, it only includes a provisions with respect discrimination. [Code of Business and Ethics - Website, 04/2019: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>Not met: UNGC principles 3-6</li> <li>Not met: Explicitly list All four ILO for AG suppliers: Its Supplier Code of Conduct includes the following provisions: 'Amazon will not tolerate the use of child labor. [...] Our suppliers must not use forced labor - slave, prison, indentured, bonded, or otherwise. [...] Our suppliers must not discriminate on the basis of race, color, national origin, gender, [...] or similar factors in hiring and working practices such as job applications, promotions, job assignments, training, wages, [...] Our suppliers must respect the rights of workers to establish and join a legal organization of their</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>own selection. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.' However, CHRB could not find a provision related with collective bargaining. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</p> <ul style="list-style-type: none"> <li>• Not met: Explicitly list ALL four ILO for AP suppliers: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary &amp; Code of Business and Ethics - Website, 04/2019: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>• Not met: Explicitly list ALL four ILO for ICT suppliers: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Explicit commitment to All four ILO Core: See above [Code of Business and Ethics - Website, 04/2019: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company indicates that it 'provides a clean, safe and healthy work environment'. [Code of Business and Ethics - Website, 04/2019: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: Its Supplier Code indicates: 'Our suppliers must provide workers with a safe and healthy work environment, [...]' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Met: H&amp;S applies to AP suppliers: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: working hours for workers [Code of Business and Ethics - Website, 04/2019: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>• Not met: Working hours for AP suppliers: Its Supplier Code indicates: 'Except in unusual or emergency situations, (i) suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Met: H&amp;S applies to ICT suppliers: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: working hours for workers [Code of Business and Ethics - Website, 04/2019: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>• Not met: Working hours for ICT suppliers: Its Supplier Code indicates: 'Except in unusual or emergency situations, (i) suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.' However, no evidence found of references to standard weekly hours or the Company explicitly committing to respect ILO conventions on working hours. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul>
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Respect land ownership and natural resources</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Voluntary Guidelines on Tenure Rights</li> <li>• Not met: IFC Performance Standards</li> <li>• Not met: FPIC for all</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people’s rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights: On its website, section 'Sustainability Question Bank', the Company indicates: 'Amazon joined BSR's HERproject, a collaborative initiative that strives to empower low-income women working in global supply chains. Bringing together global brands, their suppliers, and local NGOs, HERproject drives impact for women and business via workplace-based interventions on health, financial inclusion, and gender equality. Since its inception in 2007, HERproject has worked in more than 700 workplaces across 14 countries and has increased the well-being, confidence, and economic potential of more than 800,000 women'. However, CHRB could not find a formal statement where it commits to respect women's rights. [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Not met: Children's rights</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expects suppliers to respect these rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business Principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry (AP)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's Rights: In its website section 'Sustainability Question Bank', the Company indicates: 'Amazon joined BSR's HERproject™, a collaborative initiative that strives to empower low-income women working in global supply chains. Bringing together global brands, their suppliers, and local NGOs, HERproject™ drives impact for women and business via workplace-based interventions on health, financial inclusion, and gender equality. Since its inception in 2007, HERproject™ has worked in more than 700 workplaces across 14 countries and has increased the well-being, confidence, and economic potential of more than 800,000 women.' However, CHRB could not find a statement of policy where it commits to respect women's rights. [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Children's Rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.ICT.a	Commitment to responsible sourcing of minerals	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Responsible mineral sourcing in conflict areas: The Company states in its Conflict Minerals Report 2017: 'We are committed to avoiding the use of minerals that have fuelled conflict, and we expect our suppliers to support our efforts to identify the origin of gold, tin, tungsten, and tantalum used in products that we manufacture or contract to manufacture.' However, CHRB could not find a reference to high-risk areas in the Company's commitment to responsible sourcing. [Conflict Mineral Report 2017, 2018: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>• Met: Based on OECD Guidance: See above. In addition, the Company indicates: 'Pursuant to the Securities and Exchange Commission's conflict minerals rules, we designed our due diligence on the source and chain of custody of the gold, tin, tungsten, and tantalum in our in-scope products in accordance with the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas Third Edition, and the related Supplements on Tin, Tantalum and Tungsten and on Gold.' [Conflict Mineral Report 2017, 2018: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Requires responsible mineral sourcing from suppliers: In its Supplier Code of Conduct, the Company states: 'Amazon is committed to avoiding the use of minerals that have fuelled conflict in the Democratic Republic of the Congo or an adjoining country. We expect suppliers to support our effort to identify the origin of designated minerals used in our products.' However, CHRB could not find in the Supplier Code a reference to the OECD Due Diligence Guidance or a requirement to responsible sourcing from high risk areas. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul>
A.1.3.ICT.b	Commitment to respect human rights particularly relevant to the industry (ICT)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's Rights: On its website section 'Sustainability Question Bank', the Company indicates: 'Amazon joined BSR's HERproject, a collaborative initiative that strives to empower low-income women working in global supply chains. Bringing together global brands, their suppliers, and local NGOs, HERproject drives impact for women and business via workplace-based interventions on health, financial inclusion, and gender equality'. However, CHRB could not find a formal statement where it commits to respect women's rights. [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Children's Rights</li> </ul>

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			<ul style="list-style-type: none"> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: CEDAW/Women's Empowerment Principles</li> <li>• Not met: Child Rights Convention/Business principles</li> <li>• Not met: Convention on migrant workers</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement</li> <li>• Met: Regular stakeholder engagement: As part of its Responsible Sourcing program, the Company indicates that it conducts assessments on its suppliers, including 'Confidential worker interviews or surveys conducted without site management present'. Moreover, in its Supplier Code it says: 'To ensure that our policies and programs incorporate internationally recognized human rights standards, we conduct formal benchmarking with industry and multilateral groups to design, operate, and continually improve our risk assessment and audit program.' [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]!E &amp; Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy: In its Modern Day Slavery Statement, the Company indicates: 'Audit reports and findings are reviewed regularly by senior leadership and corrective action plans are implemented as needed. Amazon tracks remediation closely and conducts follow-up audits for significant issues. Between audits, Amazon employees meet on-site with supplier managers to discuss open issues and remediation progress.' However, CHRB could not find a statement of policy where the Company commits to remedy the adverse impacts on individuals, workers and communities that it has caused or contributed to. The information included in its Modern Say Slavery Statement seems to be focused on corrective measures to face non-compliances found in audits. [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts: The Company also states that its 'Suppliers are required to remediate violations of Amazon's Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Amazon evaluates CAPs in light of the severity level of the violation.' In addition, in its website 'Sustainability Question Bank' the Company indicates: 'We have dedicated teams that work directly with suppliers and service providers in major geographies. We offer on-site and remote training to support continuous improvement. Suppliers are also encouraged to participate in external training programs, such as industry association tutorials related to recognizing and preventing forced labor, compliance with wage and working hour requirements, and implementing management systems. We are continuously exploring ways to use Amazon's expertise to expand this support and reach more suppliers.' However, it is not clear whether the remedy cover also the impacts on individuals, workers and communities. [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a> &amp; Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Not met: Work with AP suppliers to remedy impacts: The Company also states that its 'Suppliers are required to remediate violations of Amazon's Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Amazon evaluates CAPs in light of the severity level of the violation.' In addition, in its website 'Sustainability Question Bank' the Company indicates: 'We have dedicated teams that work directly with suppliers and service providers in major geographies. We offer on-site and remote training to support continuous improvement. Suppliers are also encouraged to participate in external training programs, such as industry association tutorials related to recognizing and preventing forced labor, compliance with wage and working hour requirements, and implementing management systems. We are continuously exploring ways to use Amazon's expertise to expand this support and reach more suppliers.' However, it is not clear whether the remedy cover also the impacts on individuals, workers and communities. [Modern</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Day Slavery Statement (website), 08/2019: <a href="http://amazon.co.uk">amazon.co.uk</a> & Sustainability Question Bank, 08/2019: <a href="http://amazon.com">amazon.com</a> <ul style="list-style-type: none"> <li>• Not met: Work with ICT suppliers to remedy impacts: The Company also states that its 'Suppliers are required to remediate violations of Amazon's Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Amazon evaluates CAPs in light of the severity level of the violation.' In addition, in its website 'Sustainability Question Bank' the Company indicates: 'We have dedicated teams that work directly with suppliers and service providers in major geographies. We offer on-site and remote training to support continuous improvement. Suppliers are also encouraged to participate in external training programs, such as industry association tutorials related to recognizing and preventing forced labor, compliance with wage and working hour requirements, and implementing management systems. We are continuously exploring ways to use Amazon's expertise to expand this support and reach more suppliers.' However, it is not clear whether the remedy cover also the impacts on individuals, workers and communities. [Modern Day Slavery Statement (website), 08/2019: <a href="http://amazon.co.uk">amazon.co.uk</a> &amp; Sustainability Question Bank, 08/2019: <a href="http://amazon.com">amazon.com</a>]</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments</li> <li>• Not met: Expects AP suppliers to reflect company HRD commitments</li> <li>• Not met: Expects ICT suppliers to reflect company HRD commitments</li> </ul>

### A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: CEO or Board approves policy</li> <li>• Not met: Board level responsibility for HRs</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Board/Committee review of salient HRs</li> <li>• Not met: Examples or trends re HR discussion</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions</li> <li>• Not met: Senior responsibility for HR</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: 'Amazon has global teams focusing on our key environmental and social impacts and opportunities for innovation. In addition, in 2017 we launched the Amazon Sustainability Ambassadors, a voluntary employee program to engage sustainability-minded employees in collaborative initiatives and projects that drive sustainability results, enhance the customer experience, reduce costs, and protect the environment.' However, CHRB could not find further information describing specific human rights related tasks. [Sustainability Question Bank, 08/2019: <a href="http://amazon.com">amazon.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility for AG in supply chain</li> <li>• Not met: Day-to-day responsibility for AP in supply chain</li> <li>• Not met: Day-to-day responsibility for ICT in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights: According to its Annual Report - Proxy Statement 2018, in its Executive Compensation section: 'our compensation program provides strong long-term incentives to align our employees' interests with our shareholders' interests. [...] we do not provide cash or equity incentives tied to performance criteria'. CHRHB could not find further information of its long-term incentives, or other evidence which linked human rights to the Company's incentive mechanisms. [Annual Report 2018 - Proxy Statement, 05/2018: <a href="http://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> <li>• Not met: At least one key AP HR risk, beyond employee H&amp;S</li> <li>• Not met: At least one key ICT HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: In its Annual Report 2017, the Company presents its Risks Factors, which include: 'Our Supplier Relationships Subject Us to a Number of Risks' [...] if our suppliers or other vendors violate applicable laws, regulations, our code of standards and responsibilities, or implement practices regarded as unethical, unsafe, or hazardous to the environment, it could damage our reputation, limit our growth, and negatively affect our operating results.' Its Supplier Code include human rights provisions. [Annual Report 2017, 02/2018: <a href="http://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Audit Ctte or independent risk assessment: The Company provided information to CHRHB in relation to this indicator, but it was not material.</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to ILO core conventions</li> <li>• Not met: Communicates its policy to all workers in own operations: In its Modern Day Slavery Statement, the Company states: 'Employees of Amazon take mandatory compliance training courses on the Code of Business Conduct and Ethics, Anti-Bribery Compliance, and Workplace Harassment. [...] This year, Amazon launched training at our fulfilment operations in the UK on identifying and reporting suspected instances of modern slavery'. The Code of Business Conduct, however, only cover discrimination (as material issues). However, no evidence found describing how the Company communicates its policy on human rights for own operations to all workers. It does disclose that Amazon employees in charge of supply chain, receive specific training on the supplier code. [Modern Day Slavery Statement (website), 08/2019: <a href="http://amazon.co.uk">amazon.co.uk</a> &amp; California Supply Chain Transparency Act Statement, 05/2019: <a href="http://amazon.com">amazon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions</li> <li>• Not met: Communication of policy commitments to stakeholder</li> <li>• Not met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Commits to all 4 ILO core conventions for suppliers</li> <li>• Not met: Communicating policy down the whole AG supply chain [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary!'E &amp; Conflict Mineral Report 2017, 2018: <a href="http://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>• Not met: Requiring AG suppliers to communicate policy down the chain: On its website, the Company indicates: 'We require suppliers in our manufacturing supply chain and suppliers supporting Amazon's operations to comply with our Supplier Code of Conduct ("Supplier Code"), [...]'. In addition, on the website 'Sustainability Question Bank it says: ' We train our suppliers on the standards and conduct required by our Supplier Code. [...] We train our suppliers on the standards and conduct required by our Supplier Code to clarify our expectations and to build their capacity to deliver on these expectations.' Moreover, in its Conflict Minerals Report, the Company indicates: 'Our policy is reflected in our Supplier Code of Conduct, [...], which we communicate to our suppliers through our supplier screening process, contracts with suppliers, or by sending our suppliers a copy of the Supplier Code.' It also adds: 'In order to ensure these standards are cascaded</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>throughout our supply chain, Amazon also expects our suppliers to hold their suppliers and subcontractors to the standards and practices covered by our Supplier Code. However, as indicated, it seems to be focused in manufacturing suppliers, and therefore is not clear if this is applied in the agricultural supply chain. [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary'E &amp; Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Requiring AP suppliers to communicate policy down the chain: On its website, the Company indicates: 'We require suppliers in our manufacturing supply chain and suppliers supporting Amazon's operations to comply with our Supplier Code of Conduct ("Supplier Code"), [...]' In addition, on the website 'Sustainability Question Bank it says: ' We train our suppliers on the standards and conduct required by our Supplier Code. [...] We train our suppliers on the standards and conduct required by our Supplier Code to clarify our expectations and to build their capacity to deliver on these expectations'. Moreover, in its Conflict Minerals Report, the Company indicates: 'Our policy is reflected in our Supplier Code of Conduct, [...], which we communicate to our suppliers through our supplier screening process, contracts with suppliers, or by sending our suppliers a copy of the Supplier Code.' It also adds: 'In order to ensure these standards are cascaded throughout our supply chain, Amazon also expects our suppliers to hold their suppliers and subcontractors to the standards and practices covered by our Supplier Code. [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary'E &amp; Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Met: Requiring ICT suppliers to communicate policy down the chain: On its website, the Company indicates: 'We require suppliers in our manufacturing supply chain and suppliers supporting Amazon's operations to comply with our Supplier Code of Conduct ("Supplier Code"), [...]' In addition, on the website 'Sustainability Question Bank it says: ' We train our suppliers on the standards and conduct required by our Supplier Code. [...] We train our suppliers on the standards and conduct required by our Supplier Code to clarify our expectations and to build their capacity to deliver on these expectations'. Moreover, in its Conflict Minerals Report, the Company indicates: 'Our policy is reflected in our Supplier Code of Conduct, [...], which we communicate to our suppliers through our supplier screening process, contracts with suppliers, or by sending our suppliers a copy of the Supplier Code.' It also adds: 'In order to ensure these standards are cascaded throughout our supply chain, Amazon also expects our suppliers to hold their suppliers and subcontractors to the standards and practices covered by our Supplier Code. [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary'E &amp; Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How HR commitments made binding/contractual: In its Modern Slavery Act Statement, the Company states: 'Amazon's manufacturing purchasing agreements require our suppliers to comply with supply chain standards, [...]'. However, it is not clear that the Supplier Code commitments are included in suppliers' purchasing agreement. [California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Not met: Including on AG suppliers</li> <li>• Not met: Including on AP suppliers</li> <li>• Not met: Including on ICT suppliers</li> </ul>
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Trains all workers on HR policy commitments: In its Modern Day Slavery Statement, the Company states: 'Employees of Amazon take mandatory compliance training courses on the Code of Business Conduct and Ethics, Anti-Bribery Compliance, and Workplace Harassment. Additionally, the Amazon.com Legal Department has developed and maintains reporting guidelines for employees who wish to report violations of the Business Code of Conduct and Ethics. These guidelines include information on making reports to the Legal Department and to an independent third party. This year, Amazon launched training at our fulfillment operations in the UK on identifying and reporting suspected instances of modern slavery.' The Code of Business Conduct only cover discrimination. In addition, it says in its California Supply Chain Transparency Act that 'Amazon's employees who manage our manufacturing supply chain receive training on our Supplier Code of Conduct ("Supplier Code") and audit requirements.' However, CHRb could not find evidence indicating that the Company communicates its policy for own operations to all workers. [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a> &amp; California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Trains relevant AG managers including procurement: The Company states that 'Amazon's employees who manage our manufacturing supply chain receive training on our Supplier Code of Conduct ("Supplier Code") and audit requirements.' In addition, in its website section 'Sustainability Question Bank' it indicates: 'Amazon employees who manage our manufacturing supply chain receive training on our Supplier Code and audit requirements. Amazon also has a training program for our manufacturers on our Supplier Code and supply chain standards. Amazon employees are subject to internal accountability standards, which include disciplinary measures up to and including termination, for failing to follow Amazon requirements regarding our audits. As noted in our Code of Business Conduct and Ethics, the Legal Department will designate certain employees who, based on their level of responsibility or the nature of their work, will be required to certify periodically that they have read, understand and complied with the Code of Conduct.' [California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a> &amp; Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Met: Trains relevant AP managers including procurement: See above [California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a> &amp; Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Met: Trains relevant ICT managers including procurement: See above [California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a> &amp; Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Scores at least 1 on A.1.2</li> <li>• Not met: Monitoring implementation of HR policy commitments: In its Modern Slavery Act Statement, the Company states: 'Amazon employees are subject to internal accountability standards, which include disciplinary measures up to and including termination, for failing to follow Amazon requirements regarding our audits.' However, no evidence found describing the auditing process. [California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Met: Monitoring AG suppliers: The company indicates in its Supplier Code the following: 'Suppliers' compliance with this Supplier Code is subject to Amazon's review, including third-party auditing of work and residential facilities and conducting confidential worker interviews. Suppliers must be transparent and provide prompt access to their facilities, records, and workers during any audit.' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Met: Monitoring AP suppliers: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Met: Monitoring ICT suppliers: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Score of 2 on A.1.2</li> <li>• Not met: Describes corrective action process: In addition, the Company indicates that it requires 'suppliers to promptly provide a detailed remediation plan and take corrective actions for deviations from this Supplier Code, and Amazon will track suppliers' remediation efforts. Amazon may (without liability) terminate its relationships with any supplier found to be in violation of this Supplier Code, including for denying prompt access to our auditors.' It also states in its Modern Day Slavery Statement that: 'Suppliers are required to remediate violations of Amazon's Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Amazon evaluates CAPs in light of the severity level of the violation.' However, CHRB could not find information about the number of incidents found. [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]!E &amp; Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of AG supply chain monitored</li> <li>• Not met: Discloses % of AP supply chain monitored</li> <li>• Not met: Discloses % of ICT supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: HR affects AG selection of suppliers: Although there is some information about auditing processes before Amazon begins ordering products, the information is focused on manufacturers, so it is not clear whether this process include agricultural suppliers nor how human rights performance affect selection of</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>suppliers. [California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: HR affects on-going AG supplier relationships: According to its Supplier Code: 'Amazon may (without liability) terminate its relationships with any supplier found to be in violation of this Supplier Code, including for denying prompt access to our auditors.' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary]</li> <li>• Not met: HR affects AP selection of suppliers: In its Modern Slavery Act Statement, the Company states: 'Amazon aspires to audit our manufacturers before Amazon begins ordering products, and we require all of our suppliers to meet the standards in our Supplier Code as a condition of doing business with us.' However, 'aspiring to audit' does not indicate that all suppliers are audited before ordering products. Moreover, it is not clear how human rights performance is taken into account in the identification or selection of business partners. [California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Met: HR affects on-going AP supplier relationships: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary]</li> <li>• Not met: HR affects ICT selection of suppliers: See above [California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Met: HR affects on-going ICT supplier relationships: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met: See above</li> <li>• Not met: Working with AG suppliers to improve performance</li> <li>• Not met: Working with AP suppliers to improve performance</li> <li>• Not met: Working with ICT suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Stakeholder process or systems: The Company provided information to CHRB in relation to this indicator, but it was not material.</li> <li>• Not met: Frequency and triggers for engagement</li> <li>• Not met: Workers in AG SC engaged: As part of its Responsible Sourcing program, the Company indicates that it conducts assessments on its suppliers, including 'Confidential worker interviews or surveys conducted without site management present'. However, CHRB could not find information about a stakeholder system in place to identify and engage with affected or potentially affected stakeholder including information about the frequency or triggers for engagement. [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary!E]</li> <li>• Not met: Communities in the AG SC engaged</li> <li>• Not met: Workers in AP SC engaged: See above [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary!E]</li> <li>• Not met: Communities in the AP SC engaged</li> <li>• Not met: Workers in ICT SC engaged: See above [Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary!E]</li> <li>• Not met: Communities in the ICT SC engaged</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: The Company indicates in its MDSS document that it uses 'a combination of desk-based research, supply chain mapping against existing human rights indices, as well as internal and industry audit results to analyse the risk of modern slavery in our supply chain and operations. While modern slavery can be found in all countries and industries, we acknowledge that there is a heightened risk with: domestic and international migrant labour; contract, agency, and temporary workers; vulnerable populations (e.g. refugees); and young, or student workers. In addition to the controls listed below, this year Amazon launched a process to investigate suppliers with a heightened risk of modern slavery specifically in relation to migrant workers. Our process focuses on listening to workers' perspectives about their recruitment experience and working/living conditions, and relating anonymous feedback from workers directly to management to drive improvement. In addition, we are expanding regional teams to engage with suppliers in high-risk regions, and working with industry programmes, such the Responsible Workplace Program currently operating in Malaysia.' However, evidence seems to focus in determining the level of risk related to modern slavery rather than a process to identify which are the human rights issues and impacts that it faces (the Company acknowledges modern slavery risk and explain how it assesses it). [Modern Day Slavery Statement (website), 08/2019: <a href="https://www.amazon.co.uk">amazon.co.uk</a>]</li> <li>• Not met: Identifying risks in AG suppliers: Evidence included above refers to manufacturing supply chain. [Modern Day Slavery Statement (website), 08/2019: <a href="https://www.amazon.co.uk">amazon.co.uk</a>]</li> <li>• Not met: Identifying risks in AP suppliers: As indicated above, the Company's human rights risk assessment covers its supply chain. However, evidence refers to determining modern slavery risks in its supply chains. No evidence found of a process to identify which are the human rights issues that it may face (in addition to modern slavery, which is already identified in the evidence provided). [Modern Day Slavery Statement (website), 08/2019: <a href="https://www.amazon.co.uk">amazon.co.uk</a>]</li> <li>• Not met: Identifying risks in ICT suppliers: As indicated above, the Company's human rights risk assessment covers its supply chain. However, evidence refers to determining modern slavery risks in its supply chains. No evidence found of a process to identify which are the human rights issues that it may face (in addition to modern slavery, which is already identified in the evidence provided). [Modern Day Slavery Statement (website), 08/2019: <a href="https://www.amazon.co.uk">amazon.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification: As indicated above, evidence refers to assessing modern slavery risk, rather than an ongoing process to identify which the Company's potential human rights risks and impacts. [Modern Day Slavery Statement (website), 08/2019: <a href="https://www.amazon.co.uk">amazon.co.uk</a>]</li> <li>• Met: In consultation with stakeholders: The Company states that, 'In addition to the controls listed below, this year Amazon launched a process to investigate suppliers with a heightened risk of modern slavery specifically in relation to migrant workers. Our process focuses on listening to workers' perspectives about their recruitment experience and working/living conditions, and relating anonymous feedback from workers directly to management to drive improvement. [Modern Day Slavery Statement (website), 08/2019: <a href="https://www.amazon.co.uk">amazon.co.uk</a>]</li> <li>• Not met: In consultation with HR experts: The Company indicates that 'In addition [to a process to investigate suppliers with a heightened risk of modern slavery], we are expanding regional teams to engage with suppliers in high-risk regions, and working with industry programmes, such the Responsible Workplace Program currently operating in Malaysia'. However, it no evidence found of the Company working with human rights experts in the process of identifying risks. [Modern Day Slavery Statement (website), 08/2019: <a href="https://www.amazon.co.uk">amazon.co.uk</a>]</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	and key industry risks)		
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks: The Company states that it trains its suppliers on the standards and conduct required, and that if there are any issues, supplier must provide a detailed corrective action plans. It also engages with suppliers offering training 'Amazon recognizes our responsibility to ensure the well-being of factory workers manufacturing products for Amazon. Beyond regular factory audits and assessments, we are continuously testing new ways to improve worker well-being.' However, no evidence found of a global system to take action to prevent, mitigate or remediate the salient human rights issues assessed'. Evidence seems to focus in modern slavery risks. [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a> &amp; Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> <li>• Not met: Including in AG supply chain: Evidence seems to refer to manufacturing process, no details found on agricultural supply chain.</li> <li>• Not met: Including in AP supply chain: Example of actions decided refers to manufacturing supply chain. However, no evidence found of a global system to take action to prevent or mitigate the different salient human rights issues (evidence seems to focus in slavery-related issues). This indicator only applies in case the Company meets 'Action plans to mitigate risks'.</li> <li>• Not met: Including in ICT supply chain: Example of actions decided refers to manufacturing supply chain. However, no evidence found of a global system to take action to prevent or mitigate the different salient human rights issues (evidence seems to focus in slavery-related issues). [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a> &amp; Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> <li>• Met: Example of Actions decided: The Company indicates that it trains suppliers on the standards and conduct required by the supplier code. In addition, in the context of modern slavery, it states: 'we have dedicated teams that work directly with suppliers and service providers in major geographies. We offer on-site and remote training to support continuous improvement. Suppliers are also encouraged to participate in external training programs, such as industry association tutorials related to recognizing and preventing forced labor, compliance with wage and working hours requirement and implementing management systems. We are continuously exploring ways to use Amazon's expertise to expand this support and reach more suppliers. Amazon recognizes our responsibility to ensure the well-being of factory workers manufacturing products for Amazon. Beyond regular factory audits and assessments, we are continuously testing new ways to improve worker well being. [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a> &amp; Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective: No evidence found in relation to a system for tracking actions taken in response to human rights risks and impacts assessed, in order to evaluate whether actions to prevent or mitigate risks have produced the desired results (beyond compliance monitoring, this indicator looks for evidence of broader action plans to mitigate risks, rather than specific supplier-specific corrective action plans). The Company states that sourcing teams have social responsibility goals for these conditions. However, no further details found. [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a> &amp; Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks: See B.2.1</li> <li>• Not met: Comms plan re assessing risks: See B.2.2</li> <li>• Not met: Comms plan re action plans for risks: See B.2.3</li> <li>• Not met: Comms plan re reviewing action plans: See B.2.4</li> <li>• Not met: Including AG suppliers</li> <li>• Not met: Including AP suppliers</li> <li>• Not met: Including ICT suppliers</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not met: Responding to affected stakeholders concerns: The Company provided information to CHRB in relation to this indicator, but it was not material.</li> <li>Not met: Ensuring affected stakeholders can access communications</li> </ul>

### C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Channel accessible to all workers: The Company states in its Code of Business Conduct the following: 'The Amazon.com Legal Department has developed and maintains reporting guidelines for employees who wish to report violations of the Code of Conduct. These guidelines include information on making reports to the Legal Department and to an independent third party.' [Code of Business and Ethics - Website, 04/2019: <a href="http://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Number grievances filed, addressed or resolved</li> <li>Not met: Channel is available in all appropriate languages</li> <li>Met: Expect AG supplier to have equivalent grievance systems: In its Supplier Code, the Company indicates: 'Suppliers must protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers must create a mechanism for workers to submit their grievances anonymously.' In addition, the Company indicates in its website that it 'expects our suppliers to hold their suppliers and subcontractors to the standards and practices covered by our Supplier Code.' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary &amp; Responsible Sourcing, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary!E]</li> <li>Not met: Opens own system to AG supplier workers</li> <li>Met: Expect AP supplier to have equivalent grievance systems: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>Not met: Opens own system to AP supplier workers</li> <li>Met: Expect ICT supplier to have equivalent grievance systems: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>Not met: Opens own system to ICT supplier workers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Grievance mechanism for community</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Describes accessibility and local languages</li> <li>Not met: Expects AG supplier to have community grievance systems</li> <li>Not met: AG supplier communities use global system</li> <li>Not met: Expects AP supplier to have community grievance systems</li> <li>Not met: AP supplier communities use global system</li> <li>Not met: Expects ICT supplier to have community grievance systems</li> <li>Not met: ICT supplier communities use global system</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Engages users to create or assess system</li> <li>Not met: Description of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Engages with users on system performance</li> <li>Not met: Provides user engagement example on performance</li> <li>Not met: AG suppliers consult users in creation or assessment</li> <li>Not met: AP suppliers consult users in creation or assessment</li> <li>Not met: ICT suppliers consult users in creation or assessment</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Response timescales</li> <li>Not met: How complainants will be informed</li> <li>Not met: Who is handling the complaint</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Escalation to senior/independent level</li> </ul>
C.5	Commitment to non-retaliation over	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Public statement prohibiting retaliation: The Company indicates in its Code of Business conduct that it 'will not allow retaliation against an employee for reporting misconduct by others in good faith.' However, CHRB could not find a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	complaints or concerns made		<p>provision prohibiting retaliation against other stakeholders for raising human rights related complaints or concerns. [Code of Business and Ethics - Website, 04/2019: <a href="http://ir.aboutamazon.com">ir.aboutamazon.com</a>]</p> <ul style="list-style-type: none"> <li>• Not met: Practical measures to prevent retaliation: In its Code of Business Conduct the Company indicates that employees can make reports to its Legal Department or to an independent third party. It also indicates that its Legal Department developed a reporting guideline for employees who wish to report violations of the Code of Conduct, however, CHRB could not find these guidelines to review the process and check whether anonymous reports are available, or other practical measures to prevent retaliation. [Code of Business and Ethics - Website, 04/2019: <a href="http://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has not retaliated in practice</li> <li>• Not met: Expects AG suppliers to prohibit retaliation: The Company's Supplier Code indicates: 'Suppliers must protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers must create a mechanism for workers to submit their grievances anonymously.' However, the non-retaliation policy does not include other stakeholders. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: Expects AP suppliers to prohibit retaliation: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: Expects ICT suppliers to prohibit retaliation: See above [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul>
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Won't impede state based mechanisms</li> <li>• Not met: Complainants not asked to waive rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Will work with state based or non judicial mechanisms</li> <li>• Not met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Describes how remedy has been provided</li> <li>• Not met: Says how it would remedy key sector risks</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Changes introduced to stop repetition</li> <li>• Not met: Approach to learning from incident to prevent future impacts</li> <li>• Not met: Evaluation of the channel/mechanism</li> </ul>

## D. Performance: Company Human Rights Practices (20% of Total)

### D.1 Agricultural Products

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The Company requires in its Supplier Code that 'suppliers must pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws.' However, CHRB could not find a reference to living wage. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs (purchasing practices): The Company indicates that 'Amazon's purchase and service agreements require our manufacturing suppliers and service providers (e.g. call centers, delivery and fulfilment providers) to comply with our Supplier Code of Conduct.', however CHRB could not find information about specific practices implemented in the Company to avoid requirements which could lead to undermine human rights in supplier's workers. [Sustainability Question Bank, 08/2019: <a href="http://amazon.com">amazon.com</a>]</li> <li>• Not met: Positive incentives to respect human rights (purchasing practices)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Identifies suppliers back to manufacturing sites (factories or fields)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Discloses significant parts of SP and why</li> </ul>
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Child Labour rules in codes or contracts: Its Supplier Code indicates: 'Amazon will not tolerate the use of child labor. Our suppliers must engage workers whose age is the greater of: (i) 15, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed. Furthermore, workers under the age of 18 must not perform hazardous work. Amazon supports the development of legitimate workplace apprenticeship programs that comply with applicable laws and this Supplier Code.' However, CHRB could not find information about a provision to verify the age of job applicants and workers and put in place remediation programmes. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How working with suppliers on child labour: The Company also indicates: 'We partner closely with our suppliers to drive continuous improvement in working conditions. We train our suppliers on the standards and conduct required by our Supplier Code. Where appropriate, we use independent auditors to verify compliance, including confidential worker interviews. We may also, where appropriate, use industry association audits and other mechanisms to verify information. We regularly assess suppliers to monitor continued compliance and improvement; many sites are assessed multiple times a year, including for follow-up assessments to address specific findings. Amazon may terminate its relationships with any supplier that violates our Supplier Code or does not cooperate during assessments.' However, CHRB could not find further information describing how it works with suppliers on specific child labor matters. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul>
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Debt and fees rules in codes or contracts: The Company indicates in its Supplier Code the following: 'Workers shall not be required to pay recruitment, hiring, or other similar fees related to their employment; our suppliers must bear or reimburse to their workers the cost of any such fees. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language in advance of employment.[...] Deductions from wages as a disciplinary measure are not permitted'. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: How working with suppliers on debt &amp; fees: In its Modern Day Slavery Statement, the Company states: '[...] this year Amazon launched a process to investigate suppliers with a heightened risk of modern slavery specifically in relation to migrant workers. Our process focuses on listening to workers' perspectives about their recruitment experience and working/living conditions, and relating anonymous feedback from workers directly to management to drive improvement. In addition, we are expanding regional teams to engage with suppliers in high-risk regions, and working with industry programmes, such the Responsible Workplace Program currently operating in Malaysia'. However, Modern Slavery Statement seems to focus in 'manufacturing supply chains'. [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company's Supplier Code indicates: 'Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. [...] Our suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing.' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary]</li> <li>• Not met: How working with suppliers on free movement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company indicates in its Supplier Code: 'Our suppliers must respect the rights of workers to establish and join a legal organization of their own selection. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.' However, CHRB could not find a reference to collective bargaining. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary]</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company includes health and safety requirements in its Supplier Code, including provisions with respect the following topics: Occupational Safety; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Housing. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary]</li> <li>• Not met: Injury Rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosure</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Rules on land &amp; owners in codes or contracts</li> <li>• Not met: How working with suppliers on land issues</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Rules on water stewardship in codes or contracts: Its Supplier Code indicates: 'Workers must be provided with reasonable access to clean toilet facilities and potable drinking water [...] and reasonable access to hot water for bathing [...]' However, CHRB could not find a requirement to refrain from negatively affecting access to safe water (right to water). [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">tps://aboutamazon.com</a> summary]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: How working with suppliers on water stewardship issues: The Company also indicates: 'We partner closely with our suppliers to drive continuous improvement in working conditions. We train our suppliers on the standards and conduct required by our Supplier Code. Where appropriate, we use independent auditors to verify compliance, including confidential worker interviews. We may also, where appropriate, use industry association audits and other mechanisms to verify information. We regularly assess suppliers to monitor continued compliance and improvement; many sites are assessed multiple times a year, including for follow-up assessments to address specific findings. Amazon may terminate its relationships with any supplier that violates our Supplier Code or does not cooperate during assessments.' However, CHRB could not find further information describing how it works with suppliers on specific water stewardship matters. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts</li> <li>• Met: How working with suppliers on women's rights: On its website, the Company indicates: 'Amazon joined BSR's HERproject™, a collaborative initiative that strives to empower low-income women working in global supply chains. Bringing together global brands, their suppliers, and local NGOs, HERproject™ drives impact for women and business via workplace-based interventions on health, financial inclusion, and gender equality. Since its inception in 2007, HERproject™ has worked in more than 700 workplaces across 14 countries and has increased the well-being, confidence, and economic potential of more than 800,000 women.' [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends demonstrating progress</li> </ul>

## D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The Company requires in its Supplier Code that 'suppliers must pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws.' However, CHRB could not find a reference to living wage. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Improving living wage practices of suppliers</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs: The Company indicates that 'Amazon's purchase and service agreements require our manufacturing suppliers and service providers (e.g. call centers, delivery and fulfilment providers) to comply with our Supplier Code of Conduct.', however CHRB could not find information about specific practices implemented in the Company to avoid requirements which could lead to undermine human rights in supplier's workers. [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Positive incentives to respect human rights</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.2.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not met: Child Labour rules in codes or contracts: Its Supplier Code indicates: 'Amazon will not tolerate the use of child labor. Our suppliers must engage workers whose age is the greater of: (i) 15, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed. Furthermore, workers under the age of 18 must not perform hazardous work. Amazon supports the development of legitimate workplace apprenticeship programs that comply with applicable laws and this Supplier Code.' However, CHRB could not find information about a provision to verify the age of job applicants and workers and put in place remediation programmes. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>Not met: How working with suppliers on child labour: The Company also indicates: 'We partner closely with our suppliers to drive continuous improvement in working conditions. We train our suppliers on the standards and conduct required by our Supplier Code. Where appropriate, we use independent auditors to verify compliance, including confidential worker interviews. We may also, where appropriate, use industry association audits and other mechanisms to verify information. We regularly assess suppliers to monitor continued compliance and improvement; many sites are assessed multiple times a year, including for follow-up assessments to address specific findings. Amazon may terminate its relationships with any supplier that violates our Supplier Code or does not cooperate during assessments.' However, CHRB could not find further information describing how it works with suppliers on specific child labor matters. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not met: Both requirements under score 1 met</li> <li>Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.2.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Debt and fees rules in codes or contracts: The Company indicates in its Supplier Code the following: 'Workers shall not be required to pay recruitment, hiring, or other similar fees related to their employment; our suppliers must bear or reimburse to their workers the cost of any such fees. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language in advance of employment.[...] Deductions from wages as a disciplinary measure are not permitted.' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>Met: How working with suppliers on debt &amp; fees: In its Modern Day Slavery Statement, the Company states: '[...] this year Amazon launched a process to investigate suppliers with a heightened risk of modern slavery specifically in relation to migrant workers. Our process focuses on listening to workers' perspectives about their recruitment experience and working/living conditions, and relating anonymous feedback from workers directly to management to drive improvement. In addition, we are expanding regional teams to engage with suppliers in high-risk regions, and working with industry programmes, such the Responsible Workplace Program currently operating in Malaysia.' [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Both requirements under score 1 met [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> <li>Not met: Provide analysis of trends in progress made</li> </ul>
D.2.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Free movement rules in codes or contracts: The Company's Supplier Code indicates: 'Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. [...] Our suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing.' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: In its Modern Day Slavery Statement, the Company indicates that it 'participates in [RBA] working group on forced labour, the Responsible Labor Initiative (RLI). The RLI is a multi-stakeholder initiative, which develops resources, trainings, and strategies to address modern slavery. The RLI also works with labour agents and suppliers to understand the obstacles to remediation and identify potential solutions.' However, CHRБ could not find further information describing how the Company actively works with its suppliers on freedom of movement matters. [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company indicates in its Supplier Code: 'Our suppliers must respect the rights of workers to establish and join a legal organization of their own selection. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.' However, CHRБ could not find a reference to collective bargaining. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on FoA and CB</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company includes health and safety requirements in its Supplier Code, including provisions with respect the following topics: Occupational Safety; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Housing. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.8.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts</li> <li>• Met: How working with suppliers on women's rights: On its website, the Company indicates: 'Amazon joined BSR's HERproject™, a collaborative initiative that strives to empower low-income women working in global supply chains. Bringing together global brands, their suppliers, and local NGOs, HERproject™ drives impact for women and business via workplace-based interventions on health, financial inclusion, and gender equality. Since its inception in 2007, HERproject™ has worked in more than 700 workplaces across 14 countries and has increased the well-being, confidence, and economic potential of more than 800,000 women.' [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.2.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Working hours in codes or contracts: The Company's Supplier Code indicates: 'Except in unusual or emergency situations, (i) suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.' However, no evidence found of references to international standards on standard weekly hours. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on working hours</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>



## D.4 ICT Manufacturing

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Living wage in supplier code or contracts: The Company requires in its Supplier Code that 'suppliers must pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws.' However, CHRB could not find a reference to living wage. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Avoids business model pressure on HRs: The Company indicates that 'Amazon's purchase and service agreements require our manufacturing suppliers and service providers (e.g. call centers, delivery and fulfilment providers) to comply with our Supplier Code of Conduct.', however CHRB could not find information about specific practices implemented in the Company to avoid requirements which could lead to undermine human rights in supplier's workers. [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> <li>• Not met: Positive incentives to respect human rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifies suppliers back to product source</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Discloses significant parts of supply chain and why</li> </ul>
D.4.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Child Labour rules in codes or contracts: Its Supplier Code indicates: 'Amazon will not tolerate the use of child labor. Our suppliers must engage workers whose age is the greater of: (i) 15, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed. Furthermore, workers under the age of 18 must not perform hazardous work. Amazon supports the development of legitimate workplace apprenticeship programs that comply with applicable laws and this Supplier Code.' However, CHRB could not find information about a provision to verify the age of job applicants and workers and put in place remediation programmes. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: How working with suppliers on child labour: The Company also indicates: 'We partner closely with our suppliers to drive continuous improvement in working conditions. We train our suppliers on the standards and conduct required by our Supplier Code. Where appropriate, we use independent auditors to verify compliance, including confidential worker interviews. We may also, where appropriate, use industry association audits and other mechanisms to verify information. We regularly assess suppliers to monitor continued compliance and improvement; many sites are assessed multiple times a year, including for follow-up assessments to address specific findings. Amazon may terminate its relationships with any supplier that violates our Supplier Code or does not cooperate during assessments.' However, CHRB could not find further information describing how it works with suppliers on specific child labor matters. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends demonstrating progress</li> </ul>
D.4.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The Company indicates in its Supplier Code the following: 'Workers shall not be required to pay recruitment, hiring, or other similar fees related to their employment; our suppliers must bear or reimburse to their workers the cost of any such fees. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language in advance of employment.[...] Deductions from wages as a disciplinary measure are not permitted.' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How working with suppliers on debt &amp; fees: In its Modern Day Slavery Statement, the Company states: '[...] this year Amazon launched a process to investigate suppliers with a heightened risk of modern slavery specifically in relation to migrant workers. Our process focuses on listening to workers' perspectives about their recruitment experience and working/living conditions, and relating anonymous feedback from workers directly to management to drive improvement. In addition, we are expanding regional teams to engage with suppliers in high-risk regions, and working with industry programmes, such the Responsible Workplace Program currently operating in Malaysia.' [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The Company's Supplier Code indicates: 'Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. [...] Our suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing.' [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: How these practices are implemented and monitored for agencies, labour brokers or recruiters: In its Modern Day Slavery Statement, the Company indicates that it 'participates in [RBA] working group on forced labour, the Responsible Labor Initiative (RLI). The RLI is a multi-stakeholder initiative, which develops resources, trainings, and strategies to address modern slavery. The RLI also works with labour agents and suppliers to understand the obstacles to remediation and identify potential solutions.' However, CHRБ could not find further information describing how the Company actively works with its suppliers on freedom of movement matters. [Modern Day Slavery Statement (website), 08/2019: <a href="https://amazon.co.uk">amazon.co.uk</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: FoA &amp; CB rules in codes or contracts: The Company indicates in its Supplier Code: 'Our suppliers must respect the rights of workers to establish and join a legal organization of their own selection. Workers must not be penalized or subjected to harassment or intimidation for the non-violent exercise of their right to join or refrain from joining such legal organizations.' However, CHRБ could not find a reference to collective bargaining. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on FoA and CB</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company includes health and safety requirements in its Supplier Code, including provisions with respect the following topics: Occupational Safety; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Housing. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: Injury rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosures</li> <li>• Not met: Occupational disease rates</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.8.b	Women's rights (in the supply chain)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's rights in codes or contracts</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How working with suppliers on women's rights: On its website, the Company indicates: 'Amazon joined BSR's HERproject™, a collaborative initiative that strives to empower low-income women working in global supply chains. Bringing together global brands, their suppliers, and local NGOs, HERproject™ drives impact for women and business via workplace-based interventions on health, financial inclusion, and gender equality. Since its inception in 2007, HERproject™ has worked in more than 700 workplaces across 14 countries and has increased the well-being, confidence, and economic potential of more than 800,000 women.' [Sustainability Question Bank, 08/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.9.b	Working hours (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Working hours in codes or contracts: The Company's Supplier Code indicates: 'Except in unusual or emergency situations, (i) suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.' However, no evidence found of references to international standards on standard weekly hours. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on working hours</li> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible Mineral Sourcing: Arrangements with Suppliers and Smelters/Refiners in the Mineral Resource Supply Chains	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Responsible mineral sourcing due diligence in supplier contracts: The Company's Supplier Code indicates: 'Amazon is committed to avoiding the use of minerals that have fuelled conflict in the Democratic Republic of the Congo or an adjoining country. We expect suppliers to support our effort to identify the origin of designated minerals used in our products.' In addition, the Company states in its Modern Slavery Act Statement that 'Amazon's manufacturing purchasing agreements require our suppliers to comply with supply chain standards, [...]'. However, Supplier Code does not include a reference to high-risks areas and to OECD Guidance. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary &amp; California Supply Chain Transparency Act Statement, 05/2019: <a href="https://amazon.com">amazon.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Builds capacity with smelters/refiners</li> <li>• Not met: Disclosure of smelter information in supplier requirements [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>
D.4.10.b	Responsible Mineral Sourcing: Risk Identification in Mineral Supply Chain	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Risk identification and disclosure in line with OECD Guidance: The Company refers to the survey process carried out through the Conflict Minerals Reporting Template. No further details found on steps taken to identify risks and disclosing the risks identified.</li> <li>• Met: Identification of smelter/refiners and OECD due diligence: In its Conflict Minerals Report 2017, the Company indicates: 'Our conflict minerals due diligence is based on a survey process in which we request information from our in-scope product suppliers through the Conflict Minerals Reporting Template prepared by the Responsible Minerals Initiative. In addition, we communicated with each of our suppliers to confirm the accuracy of the information provided in their most recent template. [...] If we became aware that a supplier was sourcing gold, tin, tungsten, or tantalum from the DRC region, we then reviewed the smelters or refiners identified by the supplier against lists of certified conflict-free facilities in order to determine whether the smelter or refiner that processed those minerals had been audited and certified as conflict-free by a reputable independent third party.' [Conflict Mineral Report 2017, 2018: <a href="https://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Not met: Discloses smelters/refiners judged in line with OECD due diligence: Although the Company provides a list of smelters/refiners, it does not clarify which have been independently judged to conform to the due diligence processes covered by the OECD Guidance. The Company states that suppliers provided information for their entire supply chain without identifying which in fact processed minerals used in the in-scope products. [Conflict Mineral Report 2017, 2018: <a href="http://ir.aboutamazon.com">ir.aboutamazon.com</a>]</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>
D.4.10.c	Responsible Mineral Sourcing: Risk Management in the Mineral Supply Chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Describes mineral risk management plan for supply chain</li> <li>Not met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Supplier and stakeholders engaged in risk management strategy</li> <li>Not met: Responsible conflict mineral sourcing covers all minerals</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>Headline: Foxconn accused by China Labour Watch of non-respect of working conditions</li> <li>Area: Working hours</li> <li>Story: China Labor Watch (CLW) published the report of investigation it conducted at Hengyang Foxconn, a unit of Hon Hai Precision Industry Co., Ltd. (Foxconn). The factory manufactures Amazon's Kindle, Echo Dots and tablets. The report detailed issues of working conditions at the factory between August 2007 and April 2018. The issues identified in the report include excessive working hours (over 100 hours of overtime per month at peak production season) exceeding the legal overtime limit in China. In addition, it was claimed that some workers worked 14 days in a row with no days off.</li> <li>Sources: [The Verge, 11/06/2018: <a href="http://theverge.com">theverge.com</a>][China Labor Watch, 10/06/2018: <a href="http://chinalaborwatch.org">chinalaborwatch.org</a>][Reuters, 10/06/2018: <a href="http://reuters.com">reuters.com</a>][Reuters, 10/06/2018: <a href="http://reuters.com">reuters.com</a>]</li> </ul>
E(1).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Public response available: The Company stated that "Amazon takes reported violations of our Supplier Code of Conduct extremely seriously...which states suppliers must provide workers a safe and healthy work environment, working hours must not exceed the maximum amount permitted by law, and suppliers must pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, comply with applicable laws." [The Verge article on excessive working hours, 06/2018: <a href="http://theverge.com">theverge.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Response goes into detail: The Company does not disclose the details of the case.</li> </ul>
E(1).2	The Company has appropriate policies in place	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company policies address the general issues raised: The Company states that "Working Hours. Except in unusual or emergency situations, (i) suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law." [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>Met: Policies apply to the type of business relationships involved: See above. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Policies address the specific rights in question: See above. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul>
E(1).3	The Company has taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders.</li> <li>Met: Encourages linked business to engage affected stakeholders: The Company stated "We immediately requested a corrective action plan from Foxconn," It also said it is monitoring Foxconn's response and "compliance with our Supplier Code of Conduct."</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies.</li> <li>• Not met: Has reviewed management systems to prevent recurrence: CHRB did not find evidence of the Company reviewing the system followed by the case. Score 2</li> <li>• Not met: Remedies are satisfactory to the victims</li> <li>• Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company's improving the system or engaging with stakeholders followed by the case.</li> <li>• Not met: Denies allegations, but implements review recommendations</li> <li>• Not met: Denies allegations, and ensures systems prevent such impacts</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Headline: Twelve Tribe's Common Sense Farm linked of child labor in Cambridge, US</li> <li>• Area: Child labour</li> <li>• Story: The New York State Department of Labor found multiple violations of state child labour laws and abuse occurring at the Common Sense Farm in Washington County, New York, USA. The farm and production center location of religious sect 'Twelve Tribes' supplies soaps and skincare products to supermarkets including Walmart, Target, Amazon and Whole Foods.</li> <li>• Sources: [Times Union - 06/06/2018: <a href="https://www.timesunion.com">timesunion.com</a>][Inside Edition - 01/06/2018: <a href="https://www.insideedition.com">insideedition.com</a>]</li> </ul>
E(2).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Public response available: CHRB could not find the evidence of the Company's response in public regarding this case.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Response goes into detail</li> </ul>
E(2).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Company policies address the general issues raised: The Company states that "Amazon will not tolerate the use of child labour. Our suppliers must engage workers whose age is the greater of: (i) 15, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed." [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> <li>• Met: Policies apply to the type of business relationships involved: See above. [Supplier Code - Website, 04/2019: <a href="https://aboutamazon.com">https://aboutamazon.com</a> summary]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Policies address the specific rights in question: CHRB could not find the Company's measures to verify the age of its workers.</li> </ul>
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Engages with affected stakeholders: CHRB did not find the evidence of the Company's engagement with affected stakeholders.</li> <li>• Not met: Encourages linked business to engage affected stakeholders: CHRB could not find the evidence of the Company's encouraging its business partners to engage with the affected stakeholders.</li> <li>• Not met: Provides remedies to affected stakeholders: CHRB did not find evidence of the Company providing remedies.</li> <li>• Not met: Has reviewed management systems to prevent recurrence</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Has improved systems and engaged affected stakeholders: CHRB did not find evidence of the Company's improving the system or engaging with stakeholders followed by the case.</li> </ul>

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.41 out of 4	Out of a total of 68 indicators assessed under sections A-D of the benchmark, Amazon.com, Inc. made data public that met one or more elements of the methodology in 24 cases, leading to a disclosure score of 1.41 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Company reports on GRI</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>



Indicator Code	Indicator name	Score	Explanation
F.3	Key, High Quality Disclosures	0 out of 4	<p>Amazon.com, Inc. met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> <p>Discussing challenges openly</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2019 Key Findings report and technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.